



Sims Metal Pinelands NT Site Environmental Management Plan



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Appendix A Environment Policy

01 Description

Sims Metal (Sims) is the global leader in metals and electronics recycling. Our leadership position has been built through an uncompromising commitment to safety, customer service and the expertise and loyalty of our extraordinary people.

Sims Metal today has over 230 locations on 4 continents, and over 5,500 employees.

This Environmental Management Plan is for operations carried out in at our site in the Northern Territory at the Pinelands yard.

02 Introduction

2.1 Purpose

Sims has developed this Environmental Management Plan (EMP) for the pickup and delivery of scrap metal recycling activities.

The main purpose of this EMP is to describe the Environmental Management System (EMS) which is designed to be consistent with:

- the requirements of ISO14001:2004; and
- other applicable legislation.

The EMP describes Sims EMS, which also comprises a suite of environmental planning and management instruments that will guide the delivery of daily site activities.

This EMP provides the overview of how the Sims proposes to manage and control the environmental aspects of the daily site activities.

The EMP will identify specific impacts and required management measures and controls relevant to defined areas within the site alignment. This EMP will be applicable to all relevant Sims staff and subcontractors.

2.2 Scope

This EMP provides the framework to manage the environmental issues that may arise throughout the operational process. The key functions of this EMP include:

- Defining the Environmental Policy for the company;
- Identifying the aspects of operational activities that may have environmental impacts;
- Summarising the legislative and regulatory obligations applicable to the site operations;
- Providing a framework for monitoring, auditing, reporting, reviewing and improving; and
- Procedures for investigating and resolving any non-conformances and initiating corrective and preventative measures.

03 Legislative and Other Requirements

This topic identifies legislative and other requirements with which the company's operations are required to comply.

Sims operates according to a range of obligations defining how it is required and expected to perform. This includes various approvals, permits and licenses and outlines how compliance obligations are captured and monitored throughout the life of the site and associated off site contracts. Also identified are other requirements to which SIMS subscribes, such as selected guidelines, standards, Codes of Practice and any EMS obligations.

3.1 Legislation

The General Manager SA/NT, Operations Manager SA/NT, SHEC Manager SA/NT and the NT Manager are responsible for ensuring that all relevant statutory requirements in relation to the management of environmental risks and performance are identified and accessible.

3.2 Codes/Guidelines

In addition to the requirements discussed above, Sims shall comply with standards and codes of practice that may be implemented or referenced by the Sims for the delivery of on and off site operations. Other requirements may also be applicable to Sims' operations.

3.3 Relationship Environmental Management System to ISO14001:2004

Description

This topic identifies how this EMP has been developed to ensure the EMS is in accordance with the requirements of ISO14001:2004.

Process

The EMS applied through this EMP is based on the implementation of the EMS 'Plan-Do-Check-Act' methodology.

The Sims Environmental policy and this EMP's relationship to the EMS 'Plan-Do-Check-Act' methodology is further outlined below.

- **Environment Policy** – commitment and overall goals of Sims
 - Sims Environmental Policy (Appendix 1)
- **Planning** – Identifying and assessing issues and designing appropriate measures to minimise the associated risks. The following topics in this EMP cover the 'Plan' stage of the EMS 'Plan-Do-Check-Act' cycle:
 - Environmental Risks
 - Environmental Objectives and Targets
- **Implementation and Operation** – Implementing the risk management measures. The following topics in this EMP cover the 'Do' stage of the Plan-Do-Check-Act cycle.
Reference/Topic within this EMP:
 - Roles and Responsibility
 - Induct Site Personnel
 - Communication of Environmental Requirements.
 - Emergency Planning and Response.
- **Checking and Corrective Action** – assessing the effectiveness of risk management measures. The following topics in this EMP cover the 'Check' stage of the Plan-Do-Check-Act cycle:
 - Environmental Non-Conformance, Corrective and Preventative Actions; and
 - Inspect Site.
- **Management Review** – reviewing performance to identify areas to improve the system and the environmental outcomes. The following EMP topic covers the 'Act' stage of the EMS Plan-Do-Check-Act cycle:
 - Conduct Management Review.

04 Environmental Risks

Risk management, in accordance with the requirements of the AS/NZS 4360:2004 is an integral component of the Sims Management System. Risk management for any facility involves a systematic method of identifying, analysing and controlling the risks and activities associated with the operation of the facility activities, to minimise loss and maximise opportunities.

Risk analysis for any Sims facility involves a qualitative assessment of the risks that could significantly impact upon the site objectives and targets and strategies to control or minimize them. By monitoring the implementation of the established controls, Sims will ensure that desired outcomes are achieved.

The risk analysis will be reviewed periodically during the operation of any Sims facility, to determine opportunities to improve this plan and the accompanying processes and tools. In addition, if there are any significant incidents or operational changes, the risk analysis will be reviewed.

05 Environmental Management Framework

5.1 Policies

Sims endorses environmental practices within the company and have developed a Sims Environmental Policy (See Appendix 1). This policy can be found on the Sims Intranet and in facility offices.

5.2 Roles and Responsibilities

Description

This topic details the environmental responsibilities and accountabilities of Sims personnel in ensuring the site operations are delivered in accordance with all legal and obligatory requirements and that environmental best practice is applied throughout.

General Manager SA/NT

Overall responsibility for the management of general business and trading across the business unit.

Operations Manager SA/NT

Overall responsibility for operations activities at all Sims SA/NT sites.

NT Manager

Responsible for the day to day operation of the site including the installation and maintenance of environmental controls. Conducts daily visual and weekly inspections. Responsible for reporting any on-site environmental issues to the Operations Manager.

SHEC Manager SA/NT

The SHEC Manager SA/NT is responsible for providing support and advice to the Operations Manager SA/NT and the NT Manager, undertaking periodic inspections and completing reporting requirements.

Subcontractor Management

All subcontractors are required to operate within the overall requirements of this EMP.

5.3 Environmental Management System

This topic provides an overview of the of the key operational and control documents that form the EMS.

Environmental management strategies and measures for site-wide and site-specific risks are documented in the following environmental control documents:

- Environmental Management Plan (EMP)

- Environmental Forms, Checklists and Databases; and
- Safe Work Plans (SWP's)

The scope and interactions between these operational and control documents are provided in a schematic in the topic environmental due diligence in this EMP.

5.3.1 Environmental Management Plan (EMP)

This EMP describes the Sims system for environmental management and provides guidance to minimise and manage environmental risks associated with the operations at the Darwin yard the Pinelands. The key objectives of this EMP are to:

- implement a system of compliance with applicable legislative and non-legislative requirements and objectives;
- ensure that the implementation of the operational work procedures minimise the potential for impacts to the environment; and
- develop, implement and monitor measures that minimise pollution and optimise resource use.

5.3.2 Environmental Due Diligence

Due diligence will be exercised on all Sims sites, specifically in relation to preventing pollution and careful waste management. Due diligence is demonstrated through development and implementation of an effective EMS and supporting environmental management plans and documents.

Environmental due diligence principles are applied to the development of environmental documentation, Environmental Management tools and Environmental Monitoring tools as follows:

- Identification and application of legal and environmental policy requirements to on and off site activities
- Identification and management of environmental risks
- Inclusion of environmental management responsibility for all personnel and staff working on the site
- Development of procedures, guidelines and "on the job" instructions for all activities to protect the environment
- Inclusion of communication and action procedures for response to environmental and planning issues associated with requirements and operations; and
- Emergency response procedures for any incidents that that may result in environmental harm will be prepared and training undertaken.

5.4 Checklists, Forms and Databases

In addition to the environmental management plans, Sims has developed a suite of tools, checklists, forms and databases.

Site Environmental Inspection Checklists

Environmental inspection checklists will be developed and tailored specifically to the requirements of activities on site. These form the basis for thorough on and off site inspections carried out on a weekly basis, however recorded monthly to monitor the extent of the entire site to ensure it is operating against best practice and to the set environmental obligations and commitments. They play a key role in identifying areas for improvement and actual or potential non-conformances.

Where there is need for improvement or further mitigation, these are identified and recorded on inspection checklists along with the required action, person(s) responsible and a timeframe for closeout. Should a non-conformance be identified by a site inspection, initial reference and indication will be made on the site environment Inspection checklists prior to raising a Non-Conformance Report (NCR).

Environmental Forms, Record Sheets and Databases

Environmental forms, record sheets and databases are referenced in Environment Management tools and Environmental Monitoring tools. These are developed in the specific format required for the appropriate recording of monitoring data such as noise, vibration, water quality and air quality. Where relevant, Environmental forms will include the criteria or objective for any results, allowing for easy, initial recognition of any potential non-conformance.

06 Environments

6.1 Identify and Assess

6.1.1 Environmental Objectives

Description

Identifies the environmental aspects that could potentially be impacted upon during site operations.

Objectives	Target
Comply with EPA-NT regulations, all relevant legislative or non-legislative requirements and Sims procedures	Meet all regulator notices, penalties or formal warning letters will be addressed
Reduce community complaints	Respond to all community complaints
Demonstrate a robust environmental management approach	Environmental issues are addressed through the Environmental Management Plans and Environmental procedures
To achieve an environmentally sustainable site - maximise energy efficiency and minimise energy wastage	Review energy consumption costs to a level without compromising site efficiency or schedule
To achieve an environmentally sustainable site - reduce water consumption	Review water consumption costs to a level without compromising site efficiency or schedule
To control noise within statutory requirements	Ensure noise emissions do not exceed legislative requirements detailed in the noise assessment report
To ensure no spillage or leakage of dangerous chemicals	Minimise spill incidents. Review and action environmental non-conformances arising from audits.

6.2 Consult and Communicate

6.2.1 Communication of Environmental Requirements

Description

This topic covers environment related internal and external communications of Sims.

This includes meetings, correspondence and liaison with other Sims personnel and external stakeholders, regulators and the community.

Meetings and Correspondence

A program of internal communication networks and regular meetings has been established and coordinated by the SHEC Manager SA/NT. At these meetings, environmental management is a mandatory agenda item. Meetings where environmental issues are identified and actioned include the following:

- SHEC Manager SA/NT to provide monthly assessment to SA/NT Management
- NT Manager to chair Tool Box and/or Pre-Start meeting including subcontractors, attended by all required site personnel
- As required meetings with stakeholders or community.

Minutes of meetings are recorded, with attendees and distributed to record issues raised and actions required, with action status established at subsequent meetings.

All relevant internal correspondence and correspondence with subcontractors or consultants on environmental issues will be copied to the SHEC Manager SA/NT.

Subcontractors

Subcontractors will maintain open communication with Sims, other subcontractors and their own personnel. The Sims site contact officer or respective delegate will hold a subcontractor's kick-off meeting with each contractor before the contractor starts any work on-site, including confirmation of inductions.

Subcontractors must provide a signed "Permit to Work" authorisation prior to any commencement along with the necessary support documentation.

Alerts and Environmental Improvement Notices

Alerts, bulletins and Environmental Improvement Notices are issued for Environment, Safety, Community and Quality to relevant personnel as required.

Alerts/Bulletins

In the event of receiving external alerts/bulletins, the SHEC Manager SA/NT or delegate will inform and advise the General Manager SA/NT / Operations Manager SA/NT of the nature of the alert and any required corrective action.

Where considered necessary, the site may also create and distribute internal alerts specific to the site, industry or State.

Upon receipt of an alert, the SHEC Manager SA/NT or delegate will:

1. Through toolbox talks/meetings, inform relevant site personnel, including contractors, of its content, even if the alert is not relevant to the site
2. Display the alert on notice boards
3. Raise the matter of alert at required meetings; and
4. Keep a record describing how and to whom the alert was communicated. Also record any action required and taken as a result of the alert.

Environmental Improvement Notices (EIN)

An Environmental Improvement Notice (EIN) will be issued in instances where site personnel have not met their responsibilities despite prior directions from an SHEC Manager SA/NT. This may include actions stipulated in a weekly environmental site inspection that have not been followed through (e.g. installation of specific controls) and hence remain 'open' presenting unnecessary prolonged environmental and site risk. These EINs will be discussed in toolbox talks and other meetings and will be displayed on notice boards.

Community and Stakeholder Management

Sims will deliver site operations through ongoing efficient management of all interactions with the community and stakeholders.

External Stakeholders

Appropriate communication and, where required, consultation and with sites key external stakeholders is an essential element in obtaining the necessary approvals, licences and permits for works as well as in establishing constructive communication lines to ensure issues are dealt with efficiently and amicably.

- Stakeholders include Government Departments, Authorities, Organisations and Local Government Councils, including, but not limited to EPA–NT
- NT Work Safe
- NT Fire Brigade
- Work Cover Authority
- NTNT Police
- NTNT Ambulance and
- Utility and Service Providers

6.2.2 Hours of Work

Description

This topic states the standard hours of site operation and the procedure and approval process for works that are required to undertaken outside of the standard site hours.

Standard hours of work

The standard site hours for works are set out in the table below.

	Monday	Tuesday to Friday	Saturday, Sunday and Public Holidays
Standard hours of Work	7.30am to 4.00pm	8.00am to 4.00pm	Closed

During various stages of operation, there may be instances where additional hours of operation may be applied. These may occur when:

Shipping Operations

Out of hours Deliveries

During the various stages of the site operation, there will be instances where oversized deliveries or pickups are necessary. As oversized movements can cause disruptions to the existing traffic, it is required for these movements to occur during the off-peak hours where traffic volumes are typically at their minimum.

Transport of oversized equipment and machinery may require the occupation of more than one traffic lane. Therefore, such movements will strictly be in accordance with Department of Transport and guidelines for oversized movements.

It is undetermined where the oversized machinery / plant will originate from, however all safety precautions, in accordance with the relevant Roads Transport Authority, on oversized transport guidelines (e.g. reduced speed, vehicle convoys, lighting) will be in place to warn road users of the movements.

Prior to any oversized movements, all necessary oversize and/or over mass permits will be obtained. If deemed necessary by guidelines, liaisons between Police and relevant local authorities will be held to manage and formulate the route of the oversized vehicles and machinery.

If required by the EPL, separate approvals will be sought for any required oversize out of hour's deliveries.

6.2.3 Induct site personnel

Description

Describes the process for inducting personnel to Sims operations. Sims has a two-stage induction process.

Before any employee is permitted to commence work, including contractors, he / she will be required to complete an on-line induction that covers an environmental element with a competency assessment.

This is then followed by a Site specific induction that is relevant to the site that the employee is assigned. This Site Induction addresses the conditions of the EPA Act 1993, part 4 –

General Environmental Duty:

“All staff, contractors and visitors must not undertake any activity that pollutes, or may pollute the environment unless the person takes all reasonable and practicable measures to prevent or minimise any resulting environmental harm.”

6.2.4 Conduct toolbox talks

Description

Each site will implement a program of toolbox talks / meetings. The sessions will be of adequate duration to cover all relevant information and structured to encourage full participation.

The NT Manager is responsible for preparing and conducting toolbox talks for all personnel under their control, however, they may seek assistance in preparing and delivering the talks from time to time, e.g. SHEC Manager SA/NT and Operations Manager SA/NT.

When to hold talks

Toolbox talks will be scheduled on a regular basis, and in conjunction with pre-start meetings but no less than once per fortnight for each site.

The NT Manager may also call an additional toolbox meeting with a group of workers to discuss or highlight any aspect of the work including environment, quality or safety and health.

Topics to be covered in talks

Toolbox talks will cover topics including:

- changes in site conditions or the nature of work
- importance of personal protective equipment
- review of
 - safety issues relating to the work environment, e.g. climatic conditions, heat stress, manual handling, hazardous substances
 - environmental management, e.g. noise, dust management, water quality, waste management
 - risk management issues and controls associated with the works
 - emergency procedures and control measures
 - incident investigations;
 - environmental, safety and hazard alerts
 - stakeholder and community relations concerns and considerations and

- notices issued by the regulator

During toolbox talks, the opportunity will be provided for employees (or contractors) to raise issues and promote discussion.

Recording talks

The NT Manager will record toolbox talks using the Toolbox Talk Record and ensure all attendees print and sign their names.

If any deficiencies or remedial actions have been noted, the name of the person responsible for the action will be recorded, along with the date for completion.

The completed minutes will be distributed as follows:

- Original to be retained for filing
- Copies to designated personnel for action where required.
- Where actions are identified, these are recorded in KMI Management and actioned accordingly
- Copies of meetings are displayed on notice boards in relevant locations where applicable

6.3 Implement Controls

6.3.1 Air quality

Description

Air quality can have major impacts on human and environmental wellbeing. Management principles are designed to reduce and control the effects of air pollution generated from on and off site activities on adjacent receptors, travelling public, workers and flora and fauna.

Determine air quality impacts for site

The generation of dust on and off site is considered to be the greatest contributor to adverse air quality impacts. However, this should be limited due to works undertaken to seal access roads and surrounding areas. Potential dust sources during operation are likely to be:

- Vehicle and machinery movements;
- Exhaust emissions; and
- Dust from the general work areas.

Mitigation of air quality impacts

- Work areas, access points and driveways have been sealed. The remaining areas of the site are to be maintained to limit dust generation, i.e. stabilise surfaces
- If excessive visible dust is being generated and transported offsite by strong winds during works, works are to cease until winds have eased
- Allowances will be made for wind direction and high wind warnings during working hours
- Landscaping around the site is to be maintained to aid in the prevention of wind erosion
- General housekeeping, including sweeping, will be undertaken to limit the amount of dust in work areas
- All dust-generating activities will be inspected daily. Management strategies for controlling dust that will be employed include the use of water carts, water mist sprays, reduced speeds, signage to vehicle drivers and plant/equipment and barriers (vegetation, walls)
- Watering of sealed and unsealed roadways will be supplemented with street sweepers and water truck
- All dust-generating activities will be inspected daily
- Burning of vegetation or materials onsite is prohibited
- Allowances will be made for wind direction and high wind warnings during working hours
- Cleared areas on site will be progressively rehabilitated and stabilised to reduce air pollution, as soon as is practical

Monitoring Air Quality

Visual inspections of work areas will be undertaken daily, and any adverse dust observations are to be recorded in weekly inspection as part of normal operation.

Corrective Action

Where significant nuisance to sensitive receptors and exceedance of performance criteria occurs, the following actions will be taken:

- Cease work at the location or modify activities to correct the problem
- Consider remedial measures such as dust suppressants, wetting agents, water carts, or alternative haul and travel route to reduce or eliminate the problem

The NT Manager in consultation with the Operations Manager SA/NT who will consult the SHEC Manager SA/NT should the need for alternative measures arise.

6.3.2 Fire controls

Description

The risk of fire during operational works is a factor. Certain activities can increase the risk of fires, for example: potential ignition sources such as vehicle and equipment exhaust systems, and construction activities such as welding and grinding. Fires can cause damage to life, property and productivity and impact environmentally on flora and fauna.

Fire controls are coordinated by the NT Manager in consultation with the Operations Manager SA/NT and SHEC Manager SA/NT, with advice from local authorities.

Determine a fire impact for site

Requirements for fire controls depend on State laws and local restrictions. These can be advised by the Fire Emergency Services.

Mitigation of fire impacts

- A location risk assessment will be undertaken for fire management procedures, and risks mapped for easy reference
- Emergency response and fire fighting personnel are trained and identified
- Additional Site Personnel with fire fighting experience will be identified
- A command hierarchy will be organised to coordinate machinery when combating fires
- Designated smoking areas are identified on site. Smokers are not to dispose of cigarette butts on the ground and yards are provided with appropriate disposal utensils;
- The area around hazardous and flammable storage areas will have a suitable fire break suitable for the area, and fire fighting equipment will be kept on hand
- Any incidence of fire will be reported immediately to Operations Manager SA/NT and General Manager SA/NT and investigated.

6.3.3 Hazardous substances and dangerous goods

Description

A hazardous material is one that poses a hazard to human health or the environment when improperly handled, stored or disposed of. The hazard may arise from acute or chronic toxicity or carcinogenicity of the substance or its corrosive or flammable nature.

Prevention of receiving hazardous substances

The following sign is installed at the entrance to the site stating hazardous materials that are not accepted on site. Spot checks are also carried out randomly and on any suspicious load.



Identifying hazardous materials

Personnel on site are trained inspection and identifying hazardous and dangerous materials.

Hazardous materials that may be encountered during daily site operations are quarantined and the disposed of in the appropriate manner:

- Solid hazardous materials are normally associated with activities involving scrap metal collection and processing
- Liquid hazardous materials comprise flammable and combustible liquids and toxic chemicals including pesticides, insecticides and liquefied gases, acids, solvents, lime and degreasing agents.
- Gaseous materials which may be hazardous are flammable gases, toxic gases and gaseous emissions.

Transporting

All materials moving to and from site will be tracked using dockets and receipts. Only licensed transporters will be used to move and dispose of these materials.

When transferring dangerous goods measures will be taken to control spills, overflows and transported, local authorities will be notified in case of an emergency situation or spill during transit.

6.4 Review and Monitor

6.4.1 Inspect site

Descriptions

Site inspections are used to identify workplace hazards and deficiencies and assess safety and environmental compliance against regulatory requirements and best practice processes and initiatives. Site inspections cover all aspects of site works.

Process

Daily site inspections are carried out by the NT Manager or Darwin Yard Supervisor and any hazard and / or unauthorised work practice are recorded and the appropriate documentation completed.

Daily Inspections

- All employees are to conduct a daily visual site inspection of their work area and report any hazards to the NT Manager or Darwin Yard Supervisor
- The NT Manager or Darwin Yard Supervisor will conduct visual site inspections of the work areas every day to ensure that any potential hazards and deficiencies are identified, assessed and controlled as required. The inspections will include safety and health issues, environmental issues (erosion and sediment control, hazardous substances, dust management, noise, etc.), working practices and housekeeping
- Any issues from daily visual inspection to be recorded in site diary and rectified immediately.

Weekly Inspections

Site weekly inspections will be performed by the NT Manager or Darwin Yard Supervisor. Any hazards and deficiencies identified during the inspection will be managed by the NT Manager / Darwin Yard Supervisor and reported to record accordingly in to the KMI Management System.

Monthly Inspections

Monthly inspections will be managed as follows:

- Perform a monthly inspection which details work practices, site conditions, compliance with safety and health documentation (SWP's, permits etc.), environmental compliance, emergency response, etc.
- Findings will be reported to the recorded into the HSE Management database

6.4.2 Conduct Environmental Audits

Description

Environmental audits are part of the continual improvement process used to identify opportunities and ascertain whether systems, processes and products comply with specified, agreed and / or statutory requirements.

NT Manager, Darwin Yard Supervisor, Operations Manager SA/NT and SHECS Manager SA/NT.

The NT Manager in consultation with the SHEC Manager SA/NT will establish, allocate and maintain the audit schedule, ensuring all interested parties are continually informed.

Auditing Approach

- Environmental audits will be performed to ensure compliance with legislation and the Environmental Management System, as well as identify opportunities for improvement.
- An audit schedule will be developed to cover a period of at least 12 months
- The audit schedule will be maintained and updated throughout the life of the site.
- Audit timing and frequency will be planned to suit the status, importance and risk of the activities and areas to be audited. The audit schedule will be based on the significance of risks and results of previous audits.
- Only competent, trained resources will be allocated to implement the audit schedule.

Conducting an audit

An audit involves the following stages:



- Audit checklist: the auditor will review the relevant documentation to prepare a draft audit checklist. Before the audit, the auditor will circulate this checklist to all attendees for comment. All will return comments on the checklist; these will be consolidated by the auditor who will issue a final audit checklist and audit notification to the auditee.
- Opening meeting: at the start of the audit, an opening meeting will be conducted to establish the communication protocols that will apply during the audit and to introduce and discuss the audit plan. The audit meeting attendance record will be signed off by all attendees.
- Perform audit: the auditor will record the audit findings in the audit checklist and use the following formats to record deficiencies or improvements identified during audits: Observations, Recommendations and Action items.
- Closing meeting: after collecting, verifying and reporting on findings, the auditor will conduct a closing meeting to debrief the auditee with the audit findings and action items for agreement and sign off. The audit meeting attendance record will be signed off by all attendees.
- Audit report: the auditor will prepare and issue an audit report that includes an audit action list to the auditee.

6.4.3 Environmental Notices, Corrective and Preventative Actions

Description

This topic identifies how non-conformances will be detected and resolved through appropriate corrective and preventative actions.

All environmental notices shall be raised with the Operations Manager SA/NT and SHEC Manager SA/NT to investigate, action, recorded (HSE Management System) and resolved.

Categorisations

Environmental Non-Conformances – Identification/Detection

An environmental non-conformance can generally be defined as a failure to:

- Meet nominated environmental objectives or targets;
- Comply with environmental legislation or other requirements (e.g. EPL); and/or
- Comply with any EMS requirements.

A 'potential' or 'actual' environmental non-conformance is detected through verification processes including:

- Environmental monitoring;
- Inspections (e.g. Site Environmental Checklists);
- Incidents (Incident Reports);
- Audit programs (Audit Reports/Audit Action List); and
- Receipt of any complaints.

Reporting

All non-conformances shall be recorded into the KMI Management System within the concern log and actions assigned.

6.4.4 Report monthly Environmental performance

Description

Reporting of site data to the business units and Sims senior management is a largely automated process using the HSE Incident Management System and reporting database. Reports may be very detailed and require comprehensive input from a variety of data sources.

6.5 Manage Incident

6.5.1 Manage incidents involving hazardous substances

Description

Describes the management of incidents involving hazardous substances include fire, explosion, spillage, leakage or other escape into the environment.

Process

- Sites where hazardous substances are in use will maintain an emergency response capability and suitable number of spill kits or suitably marked area.
- In the event of an incident or near miss involving dangerous goods spill or leak:
 - Personnel will take immediate action to reduce any risk associated with the spill or leak.

- The NT Manager / Darwin Yard Supervisor will investigate the incident to determine the likely cause, record the outcome of the investigation (keep these records for the life of the facility) and take appropriate remedial actions.
- The SHEC Manager SA/NT will review the risk assessment required to meet best practice and take appropriate actions to reduce risk.
- Reporting of spills will be conducted as follows:
 - Spills will be reported through the internal HSE Management System (see section 6.5.2)

The appropriate authorities will be notified in accordance with the Emergency Response Plan and legislative requirements.

6.5.2 Report Environmental Incidents

Description

Describes how environmental incidents are classified (as low to high severity) and reported.

Process

Classify Incidents

The reporting of environmental incidents relating to harmful effects is classified into four levels of incident (see below).

Risk Matrix



Step 1 - Estimation of Impact

Level	People	Environment	Assets	Reputation
1 Minor	Minor Injury Minor Illness First Aid Required	Minor environmental damage and effect confined to private property.	Negligible production loss Losses less than 100,000 USD.	Localized concerns and no media attention. Minimal impact on public.
2 Moderate	Medical Aid Injury Restricted Work	Moderate environmental damage. Localized off site impacts. Immediate cleanup.	Short term facility/equipment outage. Losses greater than 100,000 USD.	Company wide attention. Brief local area attention. Regulatory action resulting in administrative response.
3 Major	Lost Time Injury Multiple Injuries Short term health impact	Severe reversible or short term environmental impact.	One week facility/equipment outage. Losses greater than 1 million USD.	Prolonged local area attention. Brief operating region attention. Regulatory action resulting in fines or punitive action.
4 Serious	Fatality Long term health impact. Permanent Disability	Severe irreversible or long term environmental damage	One Month facility/equipment outage. Losses greater than 10 million USD.	Widespread concerns with extensive adverse media coverage. Prolonged operating region attention. Action resulting in legal prosecution or suspension of operations.

Step 3 - Determination of Risk Potential

Impact	4 Serious				
	3 Major				
	2 Moderate				
	1 Minor				
		Remote	Unlikely	Likely	Frequent
Probability					

Step 2 - Estimation of Probability

Probability	Description	Likelihood
Remote	Could occur at some time.	Once in the lifetime of the facility.
Unlikely	Should occur at some time.	Once every 10 years.
Likely	Will probably occur at some time.	One occurrence every 1 years.
Frequent	Expected to occur in most circumstances.	More than one occurrence per year.

Management of Risk

4 EXTREME	Stop all Activities unless risk controls have been implemented and the risk is reduced to a lower level.
3 HIGH	Extensive risk controls must be immediately implemented.
MEDIUM	Represents a manageable amount of risk. Requires mitigation measures.
1 LOW	Represents an acceptable level of risk.

Recording Incidents

- Details of all incidents will be investigated and reported by the NT Manager / Operations Manager SA/NT within 2 hours;
- In the event that the Operations Manager SA/NT considers the incident “serious”, the Operations Manager SA/NT shall immediately contact the General Manager SA/NT;
- The NT Manager shall provide a report to the General Manager SA/NT and SHEC Manager SA/NT within 24 hours of the incident
- The SHEC Manager SA/NT shall record details and a copy of the report into the KMI Incident Management System as soon as possible following an incident

6.6 Manage Issues

6.6.1 Manage Enquiries and Complaints

Description

Sims will deal with enquiries/complaints in a responsive manner so that stakeholders concerns are being seriously dealt with and not dismissed. The intent is to create a relationship of trust and reliability between the community and each individual site.

Process

The Operations Manager SA/NT / SHEC Manager SA/NT will handle the enquiries and complaints that arise on a facility. The team will be available 24 hours a day, seven days a week.

All calls shall be recorded in S Drive / SHEC / Community Register.

If any member of staff is approached by someone distressed or concerned about the site operations, they will notify the Operations Manager SA/NT / SHEC Manager SA/NT immediately.

A central point of contact will be maintained – either the Operations Manager SA/NT / SHEC Manager SA/NT – for enquiries and complaints, to enable the content and distribution of information to the community to be managed and monitored.

The following protocol will be used as a basic guide used for handling enquiries and complaints.

1. The staff member who receives the enquiry or complaint will record and forward it to the NT Manager immediately, who in turn will immediately notify the Operations Manager SA/NT
2. In conjunction with site management, the enquiry/complaint will be managed until resolved.

The Operations Manager SA/NT once aware of an enquiry or complaint will:

1. Be responsible for determining if the matter should be managed as a complaint and/or classified as an enquiry or other type of call;
2. Maintain ongoing communication with the stakeholder about the investigation and outcomes of any actions;
3. Ensure details of the issue and all stakeholder contacts and associated actions are updated in the Complaints and Enquiries Register; and
4. Be responsible for identifying, advising and delegating required actions to appropriate team managers with an appropriate timeframe.
5. Ensure the complaints and enquiries register is updated with any outcomes and coordinate a follow up letter to be sent to the stakeholder within seven days of receiving the complaint (unless otherwise requested by the complainant).

AMENDMENT REGISTER

Revision	Date	Details of revision
Version 1	12/11/15	EPA NT licensing
Version 2	22/6/21	Changes throughout document, updating company name and multiple other changes

APPENDIX A – ENVIRONMENTAL POLICY

 SIMS LIMITED	SHECS Management System	SMM NAT C FORM 1.0.1 Revision: 04 Date: 21/04/2020
	Environmental Policy ANZ	

ENVIRONMENTAL POLICY

Sims Limited Australia and New Zealand (Sims ANZ) Senior Management are committed to Environmental Leadership and will ensure that protection of the environment is firmly embedded in both the company's and employees' culture.

This policy applies to all activities, products and services of Sims ANZ.

Our Environmental Aims

Sims ANZ is committed to the sustainable use of resources and operating in a manner which minimises our Environmental impact.

Our Environmental Actions

We will achieve this through to the following actions and initiatives;

- Comply with all regulatory requirements for environmental management;
- Be constantly aware of changing risks and perceptions around our environmental impacts and act as necessary;
- Include environmental issues in all business strategies and initiatives;
- Prevent pollution, reduce waste and improve resource and energy efficiency through best practice techniques;
- Educate, train and motivate our employees (including contractors) to conduct tasks in an environmentally responsible manner;
- Encourage environmental protection among our suppliers, customers and stakeholders; and
- Monitor our environmental performance, regularly review environmental objectives and targets and sustain a programme of continuous improvement;

This policy is communicated to all staff, contractors and suppliers, and is publicly available on the Sims Limited website.



JOHN GLYDE
Managing Director
Sims Limited
Australia & New Zealand