

# **ENVIRONMENTAL MANAGEMENT**

# HANDBOOK

**DARWIN OPERATIONS** 





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HEALTH SAFETY ENVIRONMENTAL MANAGEMENT AUSTRALIA PTY LTD

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## 2 INTRODUCTION

The Environmental Management Handbook was prepared in accordance with AS ISO 14004:2018 Environmental Management Systems. The purpose of this handbook is to provide a structured approach to the management of environmental issues as part of Altus Logistics Darwin Operations, ensuring regulatory and policy requirements are met.

## **3 ORGANISATIONAL CONTEXT**

Altus Logistics provides integrated and customise logistics services by managing and optimising supply chains for leading oil and gas industries. This includes:

- Supply Base Management
- Marine Services
- Supply Chain Management
- Oilfield Support Services

## 3.1 MEETING STAKEHOLDERS' NEEDS AND EXPECTATIONS

Altus Environmental Management System is driven by the aim to meet our client's current and future needs, and ensuring there is a robust platform to deliver merging environmental regulatory and procedural requirements which meet broader community standards.

#### **Table 1 Interested parties needs and expectations**

RELATIONSHIP	INTERESTED PARTY	NEEDS AND EXPECTATIONS
By responsibility	Investors	Expect the organization to manage its risks and opportunities that can affect an investment
By influence	Non-governmental organizations (NGOs)	Need the organization's cooperation to achieve the NGO's environmental goals
By proximity	Neighbours,	the community Expect socially acceptable performance, honesty and integrity
By dependency	Employees	Expect to work in a safe and healthy environment
By representation	Industry membership organization	Need collaboration on environmental issues
By authority	Regulatory or statutory agencies	Expect demonstration of legal compliance





## **3.2** COMPLIANCE OBLIGATIONS

## Table 2. Environmental legislation

	1
NORTHERN TERRITORY LEGISLATION	ADMINISTERED BY
Petroleum Act 2014 and associated Regulations and Schedule of Requirements Regulates the exploration for, and production of petroleum, including environmental protection measures which should be employed during exploration and production activities, including protection of parks and reserves and rehabilitation.	Department of Mines and Energy
Northern Territory Aboriginal Sacred Sites Act 2013 and associated Regulations Provides for the protection of sacred sites, through establishing procedures for entering such sites and procedures for avoidance of such sites when developing and using land. Generally refers to land other than Aboriginal land.	Aboriginal Areas Protection Authority (AAPA)
<ul> <li>Heritage Act 2012 and associated Regulations 2012</li> <li>Protects both natural and cultural heritage. The Act:</li> <li>Establishes the Heritage Council (consisting of eleven members)</li> <li>Establishes the NT Heritage Register</li> <li>Sets the process by which places become heritage places</li> <li>Allows for interim protection of places</li> <li>Sets out the process for getting permission to do work to heritage places</li> <li>Allows for fines and imprisonment for offences against the Act.</li> </ul>	Department of Lands, Planning and Environment
Soil Conservation and Land Utilisation Act 2013 Provides for the prevention of soil erosion and for the conservation and reclamation of soil	Soil Branch - Department of Land Resource Management
<ul> <li>Environmental Assessment Act 2013 and associated Regulations</li> <li>Provides for the assessment of the environmental effects of development proposals and for the protection of the environment</li> <li>Defines environment as being "all aspects of the surroundings of man including the physical, biological, economic, cultural and social aspects</li> </ul>	Northern Territory Environmental Protection Authority
<ul> <li>Public and Environment Health Act 2013 and associated Regulations</li> <li>This Act provides a framework for regulations to be prescribed for all public health matters.</li> <li>This Act also provides to monitor, assess and control environmental conditions, factors and agents, facilities and equipment and activities, services and products that impact on or may impact on public and environmental health</li> </ul>	Department of Health
<ul> <li>Bushfires Act 2013 and associated Regulations</li> <li>This Act outlines regulations and established penalties for certain acts relating to lighting fires</li> </ul>	Bushfires NT, Department of Land Resource Management
<ul> <li>Territory Parks and Wildlife Conservation Act 2013 and associated Regulations</li> <li>Provides for the protection, conservation and sustainable utilisation of wildlife</li> <li>Flora and Fauna Division of the Department of Land</li> </ul>	Flora and Fauna Division-Department of Land Resource Management



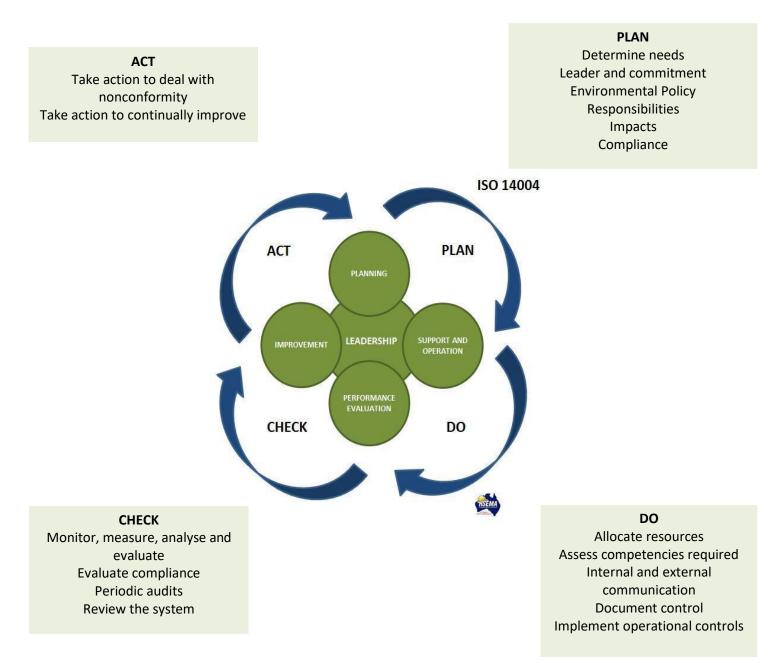


<ul> <li>Waste Management and Pollution Control Act 2013 and associated Regulations</li> <li>This Act protects and where practicable restores and enhances the quality of the NT environment. It encourages ecologically sustainable development and facilitates the implementation of National Environment Protection Measures established by the National Environment Protection Council</li> </ul>	Northern Territory Environmental Protection Authority
<ul> <li>Water Act 2013</li> <li>Provides for the investigation, allocation, use, control, protection, management and administration of water resources, including extraction of groundwater, waste management and water pollution</li> </ul>	Water Resources Division, Department of Land Resource Management
<ul> <li>Weeds Management Act 2013</li> <li>Identifies declared weeds (those which must be controlled) and provides a framework for weed management</li> </ul>	Weed Management Branch, Department of Land Resource Management
<ul> <li>Dangerous Goods Act 2012 and Regulations</li> <li>Provides for the safe storage, handling and transport of certain dangerous goods</li> </ul>	NT WorkSafe
<ul> <li>Work Health and Safety (National Uniform Legislation) Act 2011</li> <li>Provides for a balanced and nationally consistent framework to secure the health and safety of workers and workplaces</li> </ul>	NT WorkSafe

COMMONWEALTH LEGISLATION	ADMINISTERED BY
<b>Petroleum Act 2014 and associated Regulations and Schedule of Requirements</b> Regulates the exploration for, and production of petroleum, including environmental protection measures which should be employed during exploration and production activities, including protection of parks and reserves and rehabilitation.	Department of Mines and Energy
Northern Territory Aboriginal Sacred Sites Act 2013 and associated Regulations Provides for the protection of sacred sites, through establishing procedures for entering such sites and procedures for avoidance of such sites when developing and using land. Generally refers to land other than Aboriginal land.	Aboriginal Areas Protection Authority (AAPA)
<ul> <li>Heritage Act 2012 and associated Regulations 2012</li> <li>Protects both natural and cultural heritage. The Act:</li> <li>Establishes the Heritage Council (consisting of eleven members)</li> <li>Establishes the NT Heritage Register</li> <li>Sets the process by which places become heritage places</li> <li>Allows for interim protection of places</li> <li>Sets out the process for getting permission to do work to heritage places</li> <li>Allows for fines and imprisonment for offences against the Act.</li> <li>Heritage Branch,</li> </ul>	Department of Lands, Planning and Environment



#### 3.3 ALTUS ENVIRONMENTAL MANAGEMENT SYSTEM MODEL





## ENVIRONMENTAL MANAGEMENT HANDBOOK

#### 4 LEADERSHIP

Environmental Management is one of Altus highest priority, Altus is committed to operate in a manner that protects the environment and minimises environmental disturbance and complies with all the statutory requirements.

#### 4.1 ENVIRONMENTAL MANAGEMENT POLICY



ENVIRONMENTAL MANAGEMENT POLICY NEXT REVIEW BY MAR 2023

As part of our compliance processes, ALTUS Logistics is absolutely committed to the Prevention of Pollution and management of the Environment in accordance with:

- the requirements of ISO 14001 : 2015
- · our legislative, regulatory and other obligations

Throughout all of our activities, Altus Logistics will:

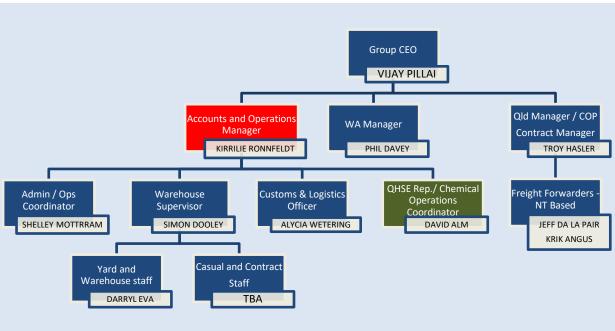
- Identify our legislative, regulatory and other obligations
- · Create systems and processes which control our environmental obligations
- Set and review environmental Objectives and Targets at relevant functions and levels
- Continually improve our environmental performance
- Communicate with stakeholders regarding our environmental obligations and our environmental performance

Engage with our customers to meet their environmental requirements and expectations.

KIRRILIE RONNFELDT ACCOUNTS AND OPERATIONS MANAGER – NT







#### 4.3 ORGANISATIONAL RESPONSIBILITIES

#### Table 3. Environmental Roles and responsibilities

RE	PERSON RESPONSIBLE					ENVIRONMENTAL MANAGEMENT RESPONSIBILITY			
					Establish Overall Direction (intended outcomes)				
					Develop Environmental Policy				
/ HSE					Develop Environmental Objectives and Processes				
GER ,					Consider Environmental aspects during the design process				
ANAG	VTOR				Monitor overall environmental performance				
IS M	S M/				Assure Fulfilment of compliance obligations				
TION	COORDINATOR			0	Promote Continual Improvement				
ACCOUNT AND OPERATIONS MANAGER	OPS C	USE	S &	SUBCONTRACTO	Identify Customers expectations				
ND O	ADMIN /	WAREHOUSE SUPERVISOR	<b>WORKERS &amp;</b>	CONT	Identify requirements for suppliers and criteria for procurement				
	ADN	WAI SUP	N0	SUB	Conform to environmental management system requirements				
					Review the operation of the environmental management system				
AC					Develop and maintain accounting processes				

## ENVIRONMENTAL MANAGEMENT HANDBOOK



#### 5.1 ADDRESSING RISK AND OPPORTUNITIES

Altus is committed to identifying risk to the environment and to controls those risks, by monitoring the effectiveness of those controls and by reviewing the way in which they perform.

Altus recognises the environment in which operates, and the effects and impacts associated with climate change, as they relate to its activities. Altus is committed to the protection of the environment, our practical measures include:



- Improving efficiency in the use of natural resources, by reducing the use, re-using and recycling all natural resources relative to our business.
  - Protection of biodiversity, habitats and ecosystems by protection of biodiversity, through direct on-site conservation, or indirectly through procurement decisions, such as buying materials from verified sustainable sources (when available).
- Climate change mitigation through avoiding or reducing emissions of greenhouse gases, and adopting policies to meet carbon neutrality, to reduce its net contribution to climate change.
- Improvement in air and water quality through avoidance, substitution or reduction.

**PROTECTION OF THE** 

**ENVIRONMENT** 

- Source reduction or elimination (including environmentally conscious design and development, material.
- Substitution, process, product or technology changes, and conservation of energy and material resources.
- Reuse or recycling of materials within the process or facility;
- Offsite reuse or recycling of materials;
- Recovery and treatment (recovery from waste streams on or offsite, treatment of emissions, and releases of wastes on or offsite to reduce their environmental impacts.
- Control mechanisms, such as incineration or controlled disposal, where permissible, however, the organization should use these methods only after other options have been considered.

Altus will provide appropriate training and information to all employees (and any subcontractors) to ensure that they can meet the expectations of both Altus and the Client, with regard to Environmental Management.





#### 5.2 IDENTIFYING ACTIVITIES, PRODUCTS AND SERVICE THAT CAN RESULT IN SIGNIFICANT ENVIRONMENTAL IMPACTS

## Table 4. Environmental impacts and assessment

ACTIVITY/PRODUCT /SERVICE	ENVIRONMENTAL ASPECT	ACTUAL AND POTENTIAL ENVIRONMENTAL IMPACTS	RISK AND OPPORTUNITIES THAT NEEDED TO BE ADDRESSED	PLANNING TO TAKE ACTION
Chemical handling and use	Uncontrolled released during fire and explosion (emergency situation)	Air pollution Pollution Soil & water Contamination Injury to humans	Risks <ul> <li>Clean-up-cost</li> <li>Fines</li> <li>Detrimental publicity</li> </ul>	Implement, monitor and review Emergency Management Procedures.
Fleet Operations	Fuel Use	Fuel Use Fuel Use Fuel Use Fuel Use Fuel Use Fuel Use Fuels		Establish environmental objectives to reduce fuel use
	Emission of nitrogen oxides	Air pollution Global Warming and Climate Change	<ul> <li>Risk</li> <li>Introduction of stricter fuel emission standards</li> </ul>	Research methods to reduce emissions
Emerging legal requirement	Legislative framework	Improve Environmental Management	<ul> <li>Risks</li> <li>Failure to identify and comply with new or changing compliance obligations can damage the organization's reputation and can lead to fines</li> </ul>	Develop control processes to ensure that the monitoring of the regulatory landscape is effective to improve the identification of emerging requirements
Extreme weather events	Uncontrolled release of chemicals	Air pollution Pollution Soil Contamination Injury to humans Spills into waterways	<ul> <li>Risk</li> <li>Climate change increases like-hood of extreme weather events.</li> <li>Business losses due to service disruptions</li> <li>Insurance concerns</li> <li>Opportunities</li> <li>Apply Business Continuity Management to ensure business survivability post extreme weather</li> </ul>	Implement, monitor and review Emergency Management Procedures. Develop a cyclone management plan

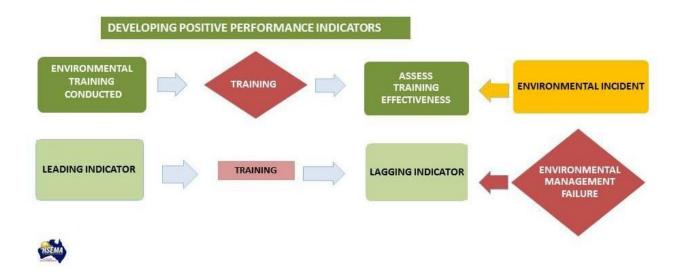




## 5.3 PERFORMANCE INDICATORS

Positive Performance Indicators (PPIs), also referred to as 'leading indicators', aim to detect and provide advance warning of latent environmental hazards. This allows Altus to implement proactive actions designed to prevent negative environmental impacts.

Their value lies in the avoidance of poor environmental management and the associated impact to the environment, the health and wellbeing of Altus employees and the public in general. PPIs provide important data for informing environmental management performance improvement, monitoring the effectiveness of the system inputs and processes and highlighting where prioritised efforts or increased resources are likely to add future value.



**Figure 1. Positive Performance Indicators** 





## 5.4 OBJECTIVES, TARGETS, PERFORMANCE MEASURE AND MONITORING

## Table 5 Performance measure, monitoring and reviewing

OBJECTIVE	TARGET	ACTION REQUIRED	COMPLETION DATE	PERFORMANCE MEASURE	MONITORING & REPORTING PERIOD	RESPONSIBLE PERSON
	Monitor energy usage and determine a reduction strategy	<ul> <li>Commence recording energy usage Jul 2018</li> </ul>	• Jul 2020	Hours worked VS Kwh	Quarterly	Country Manager /HSE
Reduce impact of	Percentage of budget spent on low emission	<ul> <li>Review low emission technology opportunities applicable to the organisation</li> </ul>	• Feb 2020	Identify technologies	Quarterly	Country Manager /HSE
greenhouse gas emission – energy usage	technology	<ul> <li>Determine a viable percentage of budget that can be destined to invest on emission technologies</li> </ul>	• Feb 2020	Budget allocation	Quarterly	Country Manager /HSE
	Planting of trees/shrubs to reduce carbon dioxide	• Determine number of trees/shrubs.	• By Dec 2019	• Area (acres)	Quarterly	Country Manager /HSE
	in atmosphere	<ul><li>Planting program</li><li>Ongoing review.</li></ul>	• Start Jul 2020	No of plants		
	Determine a waste reduction strategy	<ul><li>Determine types of waste</li><li>Commence recording waste</li></ul>	• By Feb 2020	Amount purchase / amount discarded	Quarterly	Country Manager /HSE
Reduce impact of landfill-waste	Suppliers – request biodegradable packaging or reduction of packaging	<ul> <li>Review list of suppliers and request better packaging or recycling options.</li> </ul>	• By Feb 2020	Completed Yes/No	Quarterly	Country Manager /HSE
reduction	Increase percentage of	<ul> <li>Review list of suppliers / seek supplier which use recycle materials</li> </ul>	• By Feb 2020	Completed Yes/No	Annually	Country Manager /HSE
	waste recycled	Determine amount of recycled     waste	• Jul 2020	Completed Yes/No	Quarterly	Country Manager /HSE



# ENVIRONMENTAL MANAGEMENT HANDBOOK

OBJECTIVE	TARGET	ACTION REQUIRED	COMPLETION DATE	PERFORMANCE MEASURE	MONITORING & REPORTING PERIOD	RESPONSIBLE PERSON
Capacity Development	100% of personnel trained	Personnel trained in     environmental aspect identification	• Jul 2020	% of personnel trained	Quarterly	Country Manager /HSE
Business Continuity	Develop a Business Continuity Plan	• Engage the service of a consultant to prepare	• Jul 2020	All foreseeable contingencies have been planned for	Annually	Country Manager /HSE
Serious Environmental Incident Frequency Rate (SEIFR)	0.00 (Frequency rates are per 1 million man-hours worked)		• Jul 2020	Serious Environmental Incident Frequency Rate (SEIFR)	Annually	Country Manager /HSE
>90% Investigations completed on time		<ul> <li>Prompt Response and Incident Investigations</li> </ul>	• Jul 2020	% Investigations completed on time	Annually	Country Manager /HSE



Table 6. Audit and Compliance Program

#### ALTUS SAFETY REPRESENTATIVE IS RESPONSIBLE TO PRODUCE WHS REPORTS AT DETERMINED INTERVALS, THIS ARE PROVIDED DIRECTLY TO MANAGEMENT FOR REVIEW AND FOR ACTION IF REQUIRED. ALL ACTIONS ARE TRACKED THROUGH THE COMPANY ACTIONS REGISTER. ALTUS MANAGEMENT DETERMINES WHS OBJECTIVES AND TARGETS AT PROJECT LEVEL.

SITE AUDIT & COMPLIANCE PROGRAM	FREQ	wнo	RECORD/ EVIDENCE	OUTCOMES REPORTED TO	OUTCOMES RECORDED FOR ACTION IN
COMPLIANCE – ENVIRONMENTAL SITE INSPECTION	QUARTERLY	ALTUS	ENVIRONMETAL CHECKLIST	HSE	ACTION REGISTER
WORKER ENGAGEMENT – MEETING TOOLBOX TALK – ENVIRONMENTAL	QUARTERLY	ALTUS	TOOLBOX RECORD	HSE	ACTION REGISTER
COMPLIANCE – TRAINING REQUIREMENTS	QUARTERLY / TRIGGERED BY AN EVENT	ALTUS	TRAINING REGISTER	HSE	ACTION REGISTER
MANAGEMENT REVIEW	QUARTERLY	ALTUS	INPUT: ENVIRONMENTAL CHECKLIST OUTPUT: MANAGEMENT REVIEW. AGENDA	HSE	ACTION REGISTER
			AND MINUTES		
COMPLIANCE – LEGAL REQUIREMENTS REVIEW	REQUIREMENTS		EMERGENCY DRILL RECORD MANAGEMENT REVIEW. AGENDA AND MINUTE	HSE	ACTION REGISTER
REVIEW – ENVIRONMENTAL SYSTEM REVIEW	ANNUALLY	ALTUS	WHS REVIEW DOCUMENT	HSE	ACTION REGISTER



#### **5.6 PERFORMANCE INDICATORS**

## Table 7. Environmental Key Performance Indicators

PERFOR	MANCE INDICATORS	CONTINUAL IMPROVEMENT INDICATORS				
		OCT 2021	NOV 2021	DEC 2021		
	Fuel consumption					
Emissions	Carbon dioxide reduction					
Emis	Energy usage					
	Efficiency of energy used					
acts tal	Number of environmental incidents					
Negative Impacts Environmental	Environmental accidents (unplanned releases)					
Neg En	Total Waste (% of recycled)					
Fleet and Plant Equipment	Work vehicles KMS/HRS per unit of production					
Habitat improve ments	Land area set aside for wildlife habitat					
Training	Number of personnel trained in environmental aspect identification					
Technology	Percentage of budget spent on low emission technology					





## **6** SUPPORT

#### 6.1 **RESOURCES**

To determine the necessary resources for establishing, implementing, maintaining and improving the environmental management system, Altus considers current and future needs. A cooperative strategy is adopted for resource allocation, by sharing knowledge and technologies with some of our larger clients. Altus also defines and addresses common issues, shares experiences and uses facilities jointly with other organisations within our supply chain.



#### 6.2 **DEVELOPING COMPETENCE**

Altus ensures all personnel conducting work under its control are able to fulfil their environmental compliance obligations, by offering a range of training, education and work experience options. Altus engages external services providers to ensure environmental performance and the achievement of the intended outcomes.

AREAS OF COMPETENCE	ORGANISATIONAL ROLE	COMPETENCE / CAPABILITY NEEDED	MEANS FOR ESTABLISHING COMPETENCE		
	Environmental technicians	Proficient on environmental sampling	Training and assessment on collection requirements and practices		
Environmental Technology		Ability to operate monitoring equipment	Certification or license as required		
	Environmental program managers	Proficiency in applicable environmental regulations	Degree in environmental field Training on applicable regulations		
	Persons whose work and activities involve significant environmental aspects	Awareness of how their work affect the environment	Training on environmental impacts associated with their work		
Environmental Operations		Knowledge of operating criteria that needs to be met in order tom minimize adverse environmental impacts	Training on operation criteria to ensure processes are controlled		
	Environmental managers	Able to establish, implement and improve an environmental management system	Experience in environmental management system implementation		

#### **Table 8. Competencies requirements**





		Determines risks and opportunities that need to be addressed to achieve intended outcomes and to plan appropriate actions	Training on environmental management systems	
		Ability to act upon based on the organisation's environmental performance and compliance obligations	requirements	
Environmental Audits and Reviews	Auditors – managers	Ability to develop and manage audit programs to determine	Program Management training	
		the effectiveness of the organisation environmental management system	Experience on program implementation	
Environmental Leadership	Senior management	Knowledge and understanding of the implications of establishing and implementing an environmental policy	Training on environmental management system and establishing an environmental policy	
		Knowledge and understanding of resources availability and its application to an environmental management system – assignment of responsibilities and authorities	Experience in business management	

## 6.3 ENVIRONMENTAL AWARENESS AND COMMUNICATION

The Environmental Management Handbook is used to convey information which is relevant to the organisation environmental management system. Hard copies of these documents are available to all personnel and introductory training is conducted covering the contents of this handbook.

Altus utilizes AL-For-10 Meeting and Communication record to gather information, make enquiries; determine which information is communicated to the target audience and allocate actionable items accordingly. Actionable items are recorded in the Actions Register and are review as per Altus compliance and auditing program.

Internal communications are recorded using AL-For-10 Meeting and Communication record and can also take the form of tool talks box talks which are done quarterly as a minimum or when triggered by an event, both of this processes offer opportunities for consultation, coordination and problem solving activities.

#### 6.4 DOCUMENTS CONTROL

Documents required to implement the environmental management system, shall be approved for issue and reviewed and updated as necessary. The revision status and page numbering of documents shall be implemented to ensure that incorrect documents are not inadvertently used.



# ENVIRONMENTAL MANAGEMENT HANDBOOK

Only pertinent version of documents will be made available for use and it will be ensured that they are identifiable and legible.





## 7 OPERATIONAL PLANNING AND CONTROL

## 7.1 DETERMINING OPERATIONAL CONTROLS

When determining the necessary controls, Altus considers the Risks and Opportunities which needed to be addressed and also any unintended consequence which could result.

In consultation with relevant stakeholders and interested parties; a Risk Assessment Process is in place to ensure methods are effective in preventing and minimising negative environmental impacts. If unacceptable, risks are identified new control measures will be introduced.

When developing project specific environmental plans, Altus utilises a modular format, which permits addressing activities associated with the project that require environmental risk management.

Some of the Modules may include:

- Chemical handling and blending
- Transport and storage of hazardous substances

Each module uses the below risk matrix

## Table 9. Altus Environmental Risk Matrix

				LIKELIHOOD				
				1	2	3	4	5
	SEVERITY	PO	TENTIAL	Almost Certain	Very Likely	Possible	Unlikely	Rare
Α	Extreme	Fatality, or m	ultiple fatalities	A1	A2	A3	A4	A5
в	Major	Permanent lo amputation o hospitalisatio		B1	В2	B3	B4	B5
С	Moderate	-	jury resulting ingreater than n work; including stress	C1	C2	C3	C4	C5
D	Minor	Medical treatment – not hospitalized and less than oneshift away from work		D1	D2	D3	D4	D5
Е	Insignificant	First aid or insignificant injuryonly		E1	E2	E3	E4	E5
	Action by Risk Level Act		tion Communication Process					
	All Catastrophic Shut down job until process p		ut in place tolower risk score Management Instruction			on		
Pro	Project Manager High Project Manager authorisation		n required forwork to proceed Site Safety Meeting & Toolbox			oolbox		
Sit	Site Supervisor Medium Job may continue under const		tant sitesupervision Toolbox/Pre-startbriefing			ng		
Workers Low Worker to adhere to QHSI		Worker to adhere to QHSE me	ethods Toolbox/Pre-startbriefing			ng		





## 7.2 EMERGENCY PREPAREDNESS AND RESPONSE

When planning and preparing responses to an emergency situation, Altus considers the initial and secondary environmental impacts that could occurred resulting from such response.

- Altus is prepared to respond to the following types of situations:
- Fire and Smoke Emergency (AL-SOP Emergency Response)
- Evacuation Procedure (AL-SOP Emergency Response)
- Internal / External Emergencies (AL-SOP Emergency Response)
- Medical Emergencies (AL-SOP Emergency Response)
- Significant Chemical Spill (AL-SOP Emergency Response)
- Suspicions or Unidentifiable Objects (AL-SOP Emergency Response)
- Various Operational Controls for Altus activities (Altus Standard Operation Procedures)

All environmental incidents and emergencies will be managed in accordance with the Emergency Response Standard Operating Procedure. The Accident and Incident Investigation form (AL-FOR-01) and Hazard Report (AL-FOR-02) will be used to record all environment incidents.

Upon consultation with the Environmental Protection Authority (EPA) Manager, and NT Fire Rescue and Emergency Services, each relevant authority will be notified immediately via the appropriate telephone number should a pollution incident occur that causes or threatens material harm to the environment.

The relevant authorities to be notified are:

- The EPA NT
- NT WorkSafe
- Palmerston City Council, and
- Fire and Rescue NT

Following the incident, Altus will conduct an internal investigation and a report will detail the purpose, outcome and actions pertaining to the incident, copies of this report will be made available to the relevant authorities as required.





## 8 PERFORMANCE EVALUATION

Quantitative and Qualitative data is gathered systematically to enable business decisions that can enable long term success and the creation of sustainable opportunities for Altus.

- Our key performance indicators include:
- Protection, prevention and reduction of negative environmental impacts.
- Implement lifecycle principles to prevent environmental impacts.
- Financial and operational benefits which result from implementing environmentally friendly alternatives, and strategically strengthen Altus market position.



## 8.1 EVALUATION OF COMPLIANCE

Altus performance against compliance obligations are evaluated periodically, taking into consideration the following:

- Legal requirements (Section 3.2; Table 2. Environmental Legislation refers)
- Interested parties needs and expectations (Section 3.1; Table 1 Interested parties' needs & expectations)
- Changes to compliance obligations (Section 3.2; Table 2. Environmental Legislation refers)
- Emerging efficiencies and technologies (Section 6.2; Competencies Requirements); (Table 7.
   Environmental Key performance Indicators).

Altus maintains records of all documented information, for compliance evidence.

#### 8.2 INTERNAL AUDIT

Altus internal auditing system is based on the nature of the organisation's operations, environmental aspects and impacts. Altus engages the services of an external auditor to maintain objectivity and impartiality.

#### Section 5.4 Objective, Targets, performance measure and Monitoring - Refers to this process

#### 8.3 MANAGEMENT REVIEW

Altus management conducts a review of its environmental management system to ensure it remains suitable, adequate and effective.

#### Section 5.5 Compliance Obligations - Refers to this process





## 9 IMPROVEMENT

Altus identifies opportunism for improvement by measuring, analysing and evaluating its environmental performance and compliance obligations. This is achieved by:

- Section 5.4 Objectives, Targets, Performance Measure and Monitoring.
- Section 5.5 Compliance Obligations



#### 9.1 NON-CONFORMITY AND CORRECTIVE ACTION

Altus has a systematic approach to identify non-conformances, by utilizing its Audit and Compliance Program, which include analysis and review of performance indicators, adequacy of emergency responses and review and measure of quantitative data.

#### 9.2 CONTINUAL IMPROVEMENT

Altus continually evaluates its environmental performance and the performance of its environmental management system, this process is document using the Management Review Environmental document and is done at intervals described under Altus Audit and Compliance Regime.

