

Environmental Management Plan for Transporting Waste in the Northern Territory

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1. ENVIRONMENTAL MANAGEMENT PLAN

Northline is committed to understanding the aspects of our transport and warehousing operations and controlling any safety hazards and preventing any adverse environmental impacts.

This is achieved by providing a safe working environment for employees and contractors and protecting the natural environment whilst continuing to meet the quality and service expectations of our customers. Northline's environmental management system consists of:

- ▣ Policy
- ▣ Plan
- ▣ Programs
- ▣ Site specific Operational Environmental Procedures

This Environmental Management Plan for transporting listed waste in the Northern Territory addresses how Northline will manage environmental aspects to ensure the environment and the community are not impacted by our transport activities.

2. PURPOSE AND SCOPE

The purpose of this plan is to ensure that all transportation of wastes is undertaken in accordance with our policy and to meet the requirements of waste management legislation and EPA licence EPL216. Northline's Environmental Management System has a process for:

- ▣ Maintaining compliance to internal and external standards
- ▣ Assessing the risk to the environment from Northline's activities, and
- ▣ Meeting the waste transport requirements of the Northern Territory department of Environment and Natural Resources

This plan has been developed to ensure that appropriate environmental management practices are identified and implemented to manage risks to an acceptable level and achieve sound environmental outcomes and provide the basis for the Northern Territory Environmental Protection Authority (NT EPA) to conduct an assessment in relation to new transport activities.

The EMP applies to all Northline employees and contractors who are involved in waste transport activities in the Northern Territory and provides the framework for all Northline transport operations to:

- ▣ Manage environmental aspects
- ▣ Achieve continuous improvement in environmental management
- ▣ Check, review, inspect and audit
- ▣ Report on performance
- ▣ Consult and communicate internally and externally with our stakeholders
- ▣ Carry out works and activities in accordance with the requirements contained in the EPA waste transport licence.

3. REFERENCES / RECORDS

- ▣ PRC-07 Incident Management
- ▣ PLN-08 Transport Emergency Response Plan NT Waste
- ▣ PLN-19 Crisis Management Plan
- ▣ GDE-03 Drivers Operations Guide
- ▣ FOR-70 Risk Assessment - HS
- ▣ FOR-71 Risk Assessment Environment NT Waste
- ▣ FOR-75 Risk Matrix – Environment
- ▣ FOR-97 Journey Management Plan
- ▣ FOR 132 Witness Statement Form
- ▣ FOR-203 Consultation & Communication Plan NT Waste
- ▣ SWI-815 Spill Response
- ▣ SWI-758 Road Accidents
- ▣ SWI-765 Road Incidents

4. NORTHLINE'S EPA LICENCE REQUIREMENTS

All Northline employees, contractors and others associated with the Company have an important role to play in meeting the organisations environmental responsibilities. Northline meets its obligations for transporting waste listed in the Northern Territory Environmental Protection Authority (EPA) licence EPL216-03 as per the following requirements:

- ▣ National Compliance Officer ensures the contact details recorded in NT EPA Online for this licence are correct.
- ▣ The Regional Manager West is the 24-hour emergency contact (08) 9281 7425, and support is available from the Darwin Depot Manager (08) 8901 7036, and Alice Springs Depot Manager (08) 8952 9777.
- ▣ The annual fee is paid within 50 business days of the anniversary of the commencement date of the licence.
- ▣ Copies of any document, monitoring data or other information in relation to the activity are provided either within 10 business days of a request or by the date specified, in the format requested by the NT EPA. Information is provided in electronic form by uploading the document via NT EPA Online (or by emailing waste@nt.gov.au).
- ▣ Northline maintains and follows a Consultation and Communication Plan which includes a strategy for communicating with persons who are likely to have a real interest in, or be affected by, the activity.
- ▣ Northline has a Complaints Log and process for managing all complaints received in relation to the activity, which includes the following information:
 - the person to whom the complaint was made;
 - the person responsible for managing the complaint;
 - the date and time the complaint was reported;
 - the date and time of the event(s) that led to the complaint;
 - the contact details of the complainant if known, or where no details are provided a note to that effect;

- the nature of the complaint;
- the nature of event(s) giving rise to the complaint;
 - prevailing weather conditions at the time (where relevant to the complaint);
 - the action taken in relation to the complaint, including any follow-up contact with the complainant; and
 - if no action was taken, why no action was taken.
- ▣ An Emergency Response Plan is implemented and maintained that addresses procedures for responding to emergencies associated with the activity that may cause environmental harm.
- ▣ Only waste specified in table 1 of the EPA licence EPL216-03 is collected, transported and disposed
- ▣ Northline ensures all plant and equipment used in the waste collection, transport and disposal activity:
 - is reasonably fit for the purpose and use;
 - is maintained;
 - is operated by a person trained to use the plant and equipment; and
 - is operated by, or operated by a person accompanied by, a person trained to handle, store or dispose of listed waste in connection with the activity.
- ▣ Accurate information about all vehicles used in conducting the activity is maintained on the NT EPA Online Vehicle Register.
- ▣ Vehicles used to transport listed waste will carry:
 - a legible copy of the EPA licence;
 - a legible manifest of the load being carried;
 - spill response equipment; and
 - for interstate transport, a waste transport certificate.
- ▣ Listed waste is transported in a manner that ensures listed wastes do not escape, spill or leak from the transport vehicle at any time.
- ▣ Wastewater generated from washing plant and equipment associated with the activity does not cause pollution.
- ▣ All listed waste is delivered to a premise licenced under section 30 of the WMPC Act to receive that listed waste.
- ▣ Northline does not transport Controlled Wastes between States and Territories.

5. ROLES AND RESPONSIBILITIES

All employees and contractors have a responsibility to promote Northline’s environmental performance and help contribute to the management and control of the environmental risks associated with transporting waste in the Northern Territory.

The Northline’s Chief Executive Officer has overall responsibility for environmental management. The Chief Executive Officer is supported by the General Manager Operations.

Northline operations are managed at the site level by:

- ▣ Regional Managers
- ▣ National Linehaul & PUD Manager
- ▣ Branch and/or Depot Managers
- ▣ Warehouse Managers

Northline has defined environmental management responsibilities in its Environmental Responsibilities Matrix which is part of the overall EMP.

ROLE	RESPONSIBILITY	AUTHORITY	REPORTING RELATIONSHIP
Workers (includes all employees, drivers, contractors, sub-contractors, labour hire, apprentice)	<p>Follow Northline’s standards, procedures, work instructions and associated forms.</p> <p>Take responsibility for the safety and the prevention of pollution by yourself or other workers.</p> <p>Don’t misuse equipment which may render environmental risk controls obsolete.</p> <p>Don’t deliberately create a risk (or the appearance of a risk) to disrupt others.</p> <p>Identify and report environmental hazards, injuries, illnesses and incidents to a Northline manager as soon as possible. Use the Northline Opportunity For Improvement (OFI) register to record hazards / Incidents / Injuries and near miss</p> <p>Complete mandatory environmental training.</p> <p>Comply with the safety and emergency procedures when you visit customer sites</p> <p>Use equipment effectively and safely and report any faults you identify in line with procedures.</p>	<p>Report non-compliance.</p> <p>Report misuse of equipment.</p> <p>Report anyone deliberately creating a risk or polluting the environment</p> <p>Report equipment faults to the relevant area.</p> <p>Use emergency equipment in line with your training.</p> <p>Report unsafe work undertaken by a contractor and if necessary ask them to stop work until a Northline manager is aware of the situation.</p>	<p>Warden for emergencies if available and emergency service personnel where involved.</p> <p>Relevant government inspector.</p> <p>Relevant agency, employer, organisation.</p> <p>Manager</p> <p>Senior Management</p>
Managers and Supervisors	<p>Demonstrate visible and proactive leadership and commitment to achieving environmental excellence by being roles models.</p>	<p>Monitor your team's environmental training records for compliance and supervise</p>	<p>Northline General Manager of Operations</p>



ROLE	RESPONSIBILITY	AUTHORITY	REPORTING RELATIONSHIP
	<p>Follow the Northline Environmental Management System Standards, Procedures in your respective areas. Specifically implement the Work Instructions, associated forms in the areas of:</p> <ul style="list-style-type: none"> • Prevention of pollution • Hazard Reporting • Contractor Management • Immediate Response to Incidents • Incident Reporting • Incident Investigation • Evacuation Drills <p>Consult workers and HSE/committee members about issues that affect them such as:</p> <p>Waste management, energy & water use and prevention of waste, hazard management, consultation arrangements, relevant environmental procedures, changes to or within the workplace, incident management, corrective actions, issue resolution.</p>	<p>them according to their capabilities and risk.</p> <p>Identify hazards and put in place controls.</p> <p>Comply with Northline's environmental standards, procedures, and work instructions.</p> <p>Hold team members accountable for environmental aspects within their respective areas of responsibility</p>	<p>National HSEQ & Compliance Manager</p> <p>For critical incidents such as worksite closure and clearance to resume work you are required to report to Group Security and relevant support areas such as facilities management, H&S Team.</p> <p>Business unit and functional managers</p>

6. MONITORING, REPORTING AND REVIEW

Monitoring, reporting and review is performed at Northline as part of the Management Review process. Northline's Environmental Risk Management review process is part of the overall EMP and is designed to:

- ▣ Communicate and consult
- ▣ Establish the context
- ▣ Identify environmental risks
- ▣ Analyse environmental risks
- ▣ Manage the environmental risks
- ▣ Treat environmental risks
- ▣ Control environmental risks
- ▣ Monitor and review environmental risk management steps

Northline's Environmental Risk Management process defines how to identify, assess, control and review environmental aspects and their impacts. The table below summarises how environmental risks are managed:

ENVIRONMENTAL RISK MANAGEMENT ACTIVITY	HSE Committee	Management	Staff	Contractors
Participate in consultative or other activities to identify environmental risks	✓	✓	✓	✓
Eliminate or control environmental aspects upon observation in the workplace		✓	✓	✓
Report all aspects observed in the workplace that were not able to be eliminated or adequately controlled upon identification		✓	✓	✓
Ensure daily & monthly inspections are conducted & documented for vehicles used in the transport of waste		✓	✓	✓
Review any aspect reports and implement solutions in time frames suitable to risk level		✓		
Review preventative actions identified through aspect and incident reports and ensure they are implemented in time frames suitable to risk level	✓	✓	✓	✓
Ensure all reported environmental incidents are thoroughly investigated with a risk assessment process applied to identified aspects	✓	✓		

Using the Likelihood and Consequence descriptors found in the Environmental Risk Matrix template, each aspect and its associated impact is assessed on the mechanism of how it occurs or may occur:

7. WASTE TRANSPORT & DISPOSAL

7.1 Risk Assessment

The risk assessment process is used to identify, assess and control environmental risks associated with the activity of transporting waste. The Northline environmental aspects and impacts register is used to record the risk and associated controls required to manage impacts from transporting waste in the Northern Territory.

Refer to **FOR-71 Risk Assessment Environment NT Waste**

7.2 Waste Transport

All Northline employees in the Northern Territory perform their roles and responsibilities according to the WHS laws and the Motor Vehicle Act. The Northline Drivers perform their tasks according to the Northline **GDE-03 Drivers Operation Guide**. Waste transport activities are performed to meet the requirements of the EPA licence issued by the NT EPA. In addition to the requirements contained within the EPA licence, all transport of waste material will be conducted to comply with:

- ☒ Northern Territory Waste Management and Pollution Control Act
- ☒ Requirements specified in the Australian Dangerous Goods Code (ADGC)
- ☒ Work Health and Safety Act 2011



Waste must be transported by Northline to an appropriate EPA licensed waste treatment and recycling and disposal facility and segregated until collection and processing or disposal occurs. The waste treatment and recycling and disposal facility must be approved to accept the waste.

The following procedure will be followed when a waste collection occurs:

1. The Northline Loading Manager must complete the Northline Journey Management Plan, see Appendix A. The Journey Management Plan contains the following information:
 - The type of waste is identified in detail
 - The area where the waste is to be collected from is identified
 - Amount of waste to be transported is identified
 - Site contact for the collection of the waste is noted for internal transportation
 - Handling requirements for the waste are identified from the Safety Data Sheet where applicable or other relevant reference such as the manufacturers advice
 - A contact for the waste destination has been identified and notified
 - Transport Specific Management Plan implemented
 - Vehicle inspections
 - Scheduled vehicle maintenance
 - Serviced fire equipment on vehicles
 - Vehicle housekeeping standards implemented and maintained
 - Flammable material and other stock are segregated from the listed waste
 - Contact details for emergency response personnel available for the driver

Refer to **FOR-97 Journey Management Plan**.
2. Northline will arrive on site, to pick up the identified waste. For listed wastes, the relevant documentation needs to be completed.
 - A legible manifest of the load being carried
 - A copy of Northline's Northern Territory EPA licence for transporting waste
 - A waste transport certificate for interstate transport
3. During the loading of waste, spill kits and fire fighting equipment must be made available as appropriate.
4. Where practical, portable bunds, drip trays, absorbent matting will be used at the loading area for liquid wastes to assist in containing any spillage during the loading process.

Refer to **SWI-815 Spill Response**.
5. If at any time during the loading and transporting process it is considered unsafe to proceed or there is an increased risk waste material may be released to the environment the activity must cease, the site supervisor must be informed of the event and an assessment of the situation must be undertaken.
6. All reasonable and practical measures must be taken to ensure the wastes are adequately secured prior to the waste being transported.

7. Northline must ensure that vehicles and equipment used for the transfer and transportation of waste are not overloaded or loaded in a manner which could lead to a loss of containment during transportation.
8. All wastes transported must be assessed for their compatibility, using a dangerous goods / hazardous substances segregation chart. The handling and management of wastes during transport must be closely monitored to ensure there is no risk of a release to the environment.

In summary, these requirements include but are not limited to:

- Vehicles transporting waste must hold a copy of the EPA licence for carrying out the waste transport for the specific waste type(s)
- The vehicle must use the appropriate placards when transporting the waste(s), as well as adhering to a dangerous goods segregation chart
- An EPA Waste Transport Certificate for interstate transportation of listed waste
- The waste(s) must only be disposed of to a site that has been specifically licenced for the acceptance of the waste(s)
- The waste will be transported with an appropriate Safety Data Sheet (SDS), for the contaminants within the waste e.g. oily water

7.3 Waste Disposal

All waste and recyclables must be disposed of at an EPA approved waste processing, recycling and disposal facility.

8. INCIDENT AND COMPLAINT MANAGEMENT

An incident is defined as any non-conformance with this management plan. All spills and incidents which occur both on site or during transit of waste material will be managed to ensure that all reasonable and practical measures are implemented to reduce potential risks to the environment.

As a minimum all emergency situations arising from Northline's activities will be dealt with in accordance with Northline's Emergency Response Plan. In support of site-based emergency response plans, Northline will ensure that the management of minor spills is conducted in accordance with the spill cleanup procedure.

Refer to:

PLN-08 Transport Emergency Response Plan NT Waste

SWI-758 Road Accidents

SWI-765 Road Incidents

8.1 Incident Reporting

Northline's incident reporting involves Hazard Card and Near Miss Notification for safety and environmental incidents, and Incident and Investigation Reporting with root cause analysis to determine appropriate corrective and preventative actions.

The more significant the incident, the more detailed reporting and investigation process will be recorded.

Northline HSEQ/Compliance Team provides guidance and will advise if further reporting and investigation is required.

Northline workers are required to report all environmental incidents.

All Incident Reports are entered, and details maintained in the Northline's web based event management system called INX InControl.

The Northline Compliance Team will report any notifiable incidents to the State Environmental Authority.

8.2 Complaints Process

If Northline receives a customer or public complaint regarding environmental management or incidents, the details will be managed through our Incident Reporting process **PRC-07 Incident Management**.

9. CORRECTIVE ACTION

Gaps and improvement opportunities identified in environmental reports, investigations, reviews, audits and observations are documented and actioned.

Common means by Northline to demonstrate implementation of environmental improvement actions include:

- ▣ Management approval of incident reports
- ▣ Updated management systems
- ▣ Management approval of environmental reviews and audit action reports
- ▣ Updates to the Northline HSE Plan
- ▣ Environmental Inspections and Audits action plans with documented close outs
- ▣ Records in minutes where action items are discussed

10. PERFORMANCE REPORT

Input to environmental management reviews shall include, but not limited to:

- ▣ Results of audits and evaluations of compliance with legal and other requirements
- ▣ Northline's Monthly HSE Reports
- ▣ Communication(s) from external interested parties, any complaints or positive communications
- ▣ Northline's actual environmental performance, including:
 - Leading indicators e.g. audits to schedule, training completed, actions implemented
 - Lagging indicators e.g. incidents, system failures, actions not completed to schedule, complaints
- ▣ The extent to which objectives and targets have been met
- ▣ Status of corrective actions
- ▣ Follow up actions from previous management reviews
- ▣ Changing circumstances, including developments in legal and other requirements related to Northline's environmental aspects
- ▣ Environmental Management Programs status
- ▣ Recommendations for improvement.

11. TRAINING, COMMUNICATION AND CONSULTATION

Northline’s environmental training provides information, instruction and guidance on the management of environmental aspects, impacts and controls.

Northline’s environmental training program ensures that all personnel working at or visiting a Northline site receives relevant training, induction and supervision when:

- ▣ Commencing their employment;
- ▣ Their work will have an above normal effect on the environment;
- ▣ There are changes to work processes that affects the environment;
- ▣ New or changed environmental programs are to be implemented;
- ▣ There are changes to any plant, equipment, materials and technology with potential environmental impact.

Northline will ensure the opportunity for communication and consultation occurs:

- ▣ Before making any changes to the workplace which may affect the environment and health and safety of workers
- ▣ Throughout the design, planning and implementation of changes which may affect the environment and health and safety of employees and contractors, stakeholders and interested parties
- ▣ When decisions are made about the adequacy of facilities for the welfare of employees and contractors
- ▣ When there are changes to legislative requirements or changes to business requirements
- ▣ When assessing items for purchase which may affect the environment and health and safety of employees and contractors
- ▣ In the event of an accident, injury or occurrence where an investigation is required
- ▣ When implementing control measures or altering procedures to manage risks associated with waste transport

Northline undertakes environmental training reviews to establish training needs and capabilities. The current environmental training is summarised in the table below:

TRAINING	MEDIUM	WHO	RECORDS
Induction	On Site Instruction	All Employees & Contractors	Maintained in Northline’s on-site IT system
Spill Control	External Training	All Employees & Contractors	Maintained in Northline’s on-site IT system
DG Awareness	On Site Instruction	All Employees & Contractors	Maintained in Northline’s on-site IT system
DG Transport	External Training	Fleet Schedulers, Operation Managers, Warehouse Staff	Maintained in Northline’s on-site IT system
Trackable Waste	On Site Instruction	All Employees & Contractors	Maintained in Northline’s on-site IT system
Environment Incident Reporting	On Site Instruction	All Employees & Contractors	Maintained in Northline’s on-site IT system
General Environmental Roles	On Site Instruction	All Employees & Contractors	Maintained in Northline’s on-site IT system



APPENDIX A: JOURNEY MANAGEMENT PLAN

Journey Management

Purpose

All Australian city to city road journeys undertaken by any driver engaged in providing services and work for Northline must be managed to ensure that action is taken to mitigate the risks.

Scope

Journey Management Planning applies to all Australian city to city heavy vehicle road journeys in the conduct of business on behalf of Northline.

Requirements

- Road journeys should only be undertaken where deemed necessary for the achievement of business objectives and after any safer journey options have been excluded, for example rail or air transport alternatives.
- Driver to complete the JMP, for Journey and for variations due to delays loading/unloading, road-works, accidents, night driving, backloads or any unforeseen circumstances.
- A contractor may use their own Journey Management Plan, however all requirements in Northline JMP must be included. If not, the Contractor must ensure Northline JMP is also completed prior to departure of the driver.

Objectives

- All vehicles will be fit for purpose and have been inspected using the Pre-Departure Checklist below
- Drivers will have been appropriately trained (which includes Northline induction) and advised of the contents of this Journey Management Plan they are about to undertake and completed plans will be readily accessible to drivers at the point of departure.
- Drivers will be rested and alert (not suffering from tiredness or fatigue) prior to the journey commencing.