



NT Transport of Waste - Environmental Management Procedure

QUDOS- 101886

Purpose

Neil Mansell Group (NMG) is committed to ensuring a safe and healthy working environment within all areas of NMG operations. As this can be only achieved by a shared responsibility process and aim, the full commitment and involvement of the persons involved or who come into contact shall support and abide by this Procedure for all operations.

Scope

NMG has developed an Environmental Management System (EMS) that meets the international standard AS/NZS ISO 14001. In accordance with the EMS and Section 4.4.6 of AS/NZS ISO 14001, key operations and activities associated with significant environmental aspects must be controlled to:

- Minimise environmental risk;
- Comply with legal and other requirements; and
- Continually improve.

Neil Mansell Transport will be engaged by third party companies for the transportation of specified wastes, according to Licencing conditions, from sites to approved waste facilities. This will be predominantly, but is not limited to, mining sites and mining camps.

Referenced Documents

- AS/NZS ISO 14001 Standards
- Environmental Protection Act
- Environmental Protection Regulation
- NMG Environmental Protection SWP
- NMG Health, Safety and Environment Policy
- NT Waste Management and Pollution Control Act (WMPC) Act
- NMG Incident Reporting and Investigation Procedure

Definitions

Environment	The social, economic, aesthetic and cultural conditions that are effected by a combination of ecosystems and their constituent parts, all natural and physical resources, as well as the qualities and characteristics of locations, places and areas that contribute to their biological diversity and integrity
Notifiable Event	An incident, no matter how minor (or whether accidental or deliberate) that has the potential to cause damage or harm to the environment due to contamination
Employee	An employee, contractor, subcontractor or agent of NMG (for simplicity will be referred to as an employee or operator)
Administering Authority	Department of Environment and Heritage Protection



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1.0 Roles and Responsibilities

The following responsibilities apply to all personnel undertaking activities covered by this document.

Roles	Responsibilities
Directors	<ul style="list-style-type: none"> Overall accountability for activities and infrastructure within the group. Provide adequate resources to ensure this procedure is adhered to.
Senior Management	<ul style="list-style-type: none"> Ensure the environmental controls are implemented in accordance with this procedure; Ensure all environmental incidents are notified to the Directors as soon as practical (within 4 hrs.) to enable appropriate reporting to the regulator/ authorities; Assist with incident investigations and identification and close out of any corrective and preventative actions; Ensure actions and non-conformances are closed out; Provide adequate resources to ensure this procedure is adhered to;
Supervisory Personnel	<ul style="list-style-type: none"> Ensure the environmental controls are implemented in accordance with this procedure; Ensure all environmental incidents are notified to Senior Management as soon as practical (within 4 hrs.) to enable appropriate reporting time frame. Assist with incident investigations and identification and close out of any corrective and preventative actions; Compile all approvals required for operations; Drive a culture of compliance.
HSEQ Manager	<ul style="list-style-type: none"> Notification of environmental incidents to the regulator, as required. Notification of potentially regulator notifiable incidents to the Directors; Assist with incident investigations and identify corrective and preventative actions; Assist with environmental complaints Provide direction and overview for NMG environmental performance; Support team with environmental advice and feedback; Provide environmental team resources to ensure requirements are adhered to. Ensure this procedure is incorporated into the EMS internal audit program. Ensure all required Environmental Licences are obtained and maintained.



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Role	Responsibilities
HSE Advisors	<ul style="list-style-type: none">• Communicate and provide suitable environmental awareness training programs to ensure all personnel are aware and understand the requirements of this procedure;• Keep up to date with scheduled works and progress• Proactively inspect works to identify and help rectify any potential non-compliances and always strive to minimise environmental impacts;• Undertake scheduled audits providing feedback and following up all actions until closed;• Assist with incident investigations, and manage individual cases until corrective and preventative actions have been closed out;• Assist with environmental complaints• Review contractor's Environmental Management Plans and supporting documents;• Provide advice and help to achieve solutions on environmental issues;• Drive a culture of environmental performance and improvement through various mediums including Safety meetings, TBT and Training
Contractor	<ul style="list-style-type: none">• Adhere to all relevant requirements of this procedure;• Ensure suitable environmental training programs are implemented.
All Staff (employees and contractors)	<ul style="list-style-type: none">• Encourage all personnel to raise any environmental concerns, promote best practices, and drive continual improvement;• Follow procedures as outlined in this document to ensure the environmental impacts of their work are minimised;• Participate in any relevant training programs;• Seek advice and direction from the HSE team about environmental requirements and issues; and• Report environmental incidents and participate in incident investigations.



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1.1 Background Information

Operating hours for all sites are to comply with the hours specified on the relevant environmental license, other than when special approval has been obtained.

A brief summary of operations to be carried out are as follows:-

- (a) Pick up of approved Waste Products in suitable containers/ packaging
- (b) Restraining and Transportation of Waste to approved sites/ facilities
- (c) Unloading of Waste Products at approved sites/ facilities.

It must be noted that this document does not constitute in any way, or impact upon, safety instructions and issues. If any requirement of this Procedure contradicts safe working practices, this must be brought to the attention of WHS Manager.

1.2 Report Structure

To address each activity that may have relevance to the environment, Section 2 of this report contains several elements that cover the specific issues. The specific elements are as follows:

<u>Element #</u>	<u>Description</u>
OP1	Water quality
OP2	Air Quality/Dust Control
OP3	Noise
OP4	Waste Management
OP5	Hazardous Substances
OP6	Emergency Response – Spillage
OP7	Staff Training

Each element will generally be assessed by addressing the following criteria:

- **Policy:** The operation Policy that applies to the element;
- **Objectives:** The performance requirements for the element of the operation;
- **Management Strategy:** The strategies that will be implemented to achieve the objectives;
- **Monitoring:** The monitoring requirements that will measure actual performance of Management Strategies;
- **Reporting:** The format, timing and responsibility for reporting and auditing of the results of monitoring; and



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- **Corrective Action:** The action to be implemented if the performance objectives are not reached and the person/organization responsible for that action.

1.3 Consultancy Team

This Procedure was prepared by the NMG HSE Team in consultation with Management.

1.4 Glossary of Terms and Definitions

The following details the use of industry terms and states definitions in the context of this report:

- **EPA** - Queensland Environmental Protection Act 1994
- **EPR** - Queensland Environment Regulation 2008
- **EPA** - Environmental Protection Agency
- **WMPC Act** - NT Waste Management and Pollution Control Act 1998

In accordance with the WMPC Act 1998:

Environment

- means air, water, organisms and ecosystems and includes
 - (a) the well-being of humans;
 - (b) structures made or modified by humans;
 - (c) the amenity values of an area; and
 - (d) economic, cultural and social conditions.

Contaminant

- “Contamination” of the environment is the release (whether by act or omission) of a contaminant into the environment.

Contaminant means a solid, liquid or gas or any combination of such substances and includes:

- (a) noise, odour, heat and electromagnetic radiation;
- (b) a prescribed substance or prescribed class of substances; and
- (c) a substance having a prescribed property or prescribed class of properties.

Noise

- means a vibration of a frequency in the range of 0 to 20,000 Hertz.

Waste

- means:
 - (a) a solid, a liquid or a gas; or
 - (b) a mixture of such substances, that is or are left over, surplus or an unwanted by-product from any activity (whether or not the substance is of value) and includes a prescribed substance or class of substances.



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Environmental Harm

- means:
 - (a) any harm to or adverse effect on the environment; or
 - (b) any potential harm (including the risk of harm and future harm) to or potential adverse effect on the environment, of any degree or duration and includes environmental nuisance.

Environmental Nuisance

- means:
 - (a) an adverse effect on the amenity of an area that:
 - (i) is caused by noise, smoke, dust, fumes or odour; and
 - (ii) unreasonably interferes with or is likely to unreasonably interfere with the enjoyment of the area by persons who occupy a place within the area or are otherwise lawfully in the area; or
 - (b) an unsightly or offensive condition caused by contaminants or waste

1.5 Environmental Duties

The following is from the **WMPC Act**- NT Waste Management and Pollution Control Act 1998.

General Environmental Duty

- (1) A person who:
 - (a) conducts an activity that causes or is likely to cause pollution resulting in environmental harm or that generates or is likely to generate waste; or
 - (b) performs an action that causes or is likely to cause pollution resulting in environmental harm or that generates or is likely to generate waste, must take all measures that are reasonable and practicable to:
 - (c) prevent or minimise the pollution or environmental harm; and
 - (d) reduce the amount of the waste.
- (2) Without limiting the generality of subsection (1), in determining which measures are reasonable and practicable for the purposes of subsection (1), a person is to have regard to:
 - (a) the nature of the environmental harm and the sensitivity of the environment into which a contaminant or waste is placed or may be placed;
 - (b) current technical information reasonably available to the person in relation to the activity and the likelihood that a measure proposed in the information would minimise the pollution, environmental harm or waste that the activity or action may cause; and
 - (c) the financial implications of implementing or carrying out the measures.
- (3) A failure to comply with subsection (1) does not of itself constitute an offence, but where a person has failed to comply with the subsection a pollution abatement notice may be issued to him or her.



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Duty to Notify of Incidents Causing or Threatening to Cause Pollution

(1) Where:

- (a) an incident occurs in the conduct of an activity; and
- (b) the incident causes, or is threatening or may threaten to cause, pollution resulting in material environmental harm or serious environmental harm, the person conducting the activity must notify the NT EPA in accordance with subsection (3) as soon as practicable after (and in any case within 24 hours after) first becoming aware of the incident or the time he or she ought reasonably be expected to have become aware of the incident.

Penalty: environmental offence level 4.

(2) Where:

- (a) an incident occurs in the conduct of an activity; and
- (b) the incident causes, or is threatening or may threaten to cause, pollution resulting in material environmental harm or serious environmental harm, the person must not intentionally fail to notify the NT EPA in accordance with subsection (3) as soon as practicable and in any case within 24 hours after first becoming aware of the incident.

Penalty: environmental offence level 3.

(3) A notification under subsection (1) or (2) is to specify:

- (a) the incident causing or threatening to cause pollution;
- (b) the place where the incident occurred;
- (c) the date and time of the incident;
- (d) how the pollution has occurred, is occurring or may occur;
- (e) the attempts made to prevent, reduce, control, rectify or clean up the pollution or resultant environmental harm caused or threatening to be caused by the incident; and
- (f) the identity of the person notifying.

(4) It is a defence to a charge of committing an offence against subsection (1) or (2) if the defendant establishes that he or she believed, on reasonable grounds, that the NT EPA had been notified of the incident before 24 hours after the person first became aware, or ought reasonably be expected to have become aware, of the incident.

(5) For the purposes of this section, incident includes:

- (a) an accident, emergency or malfunction; and
- (b) a deliberate action, whether or not that action was taken by the person conducting the activity in the course of which the incident occurred.

(6) Notification provided under subsection (1) or (2) is not to be used as evidence in proceedings before a court, other than proceedings for an offence against this section.

1.6 Review of this EMS

This Procedure is to be reviewed and periodically updated to reflect new knowledge gained during the course of operations and to reflect changed community standards (values). Changes to the Management system will be developed and implemented in consultation with the relevant authorities. It is recommended that such reviews be undertaken on a biennial time frame.



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2. OPERATION PHASE ELEMENTS

2.1 Element OP1 – Water Quality

2.1.1 Policy

To minimise the risk to water systems and sources

2.1.2 Objectives

1. To ensure that pollutants do not enter any water sources or systems.
2. To ensure that all containers used for transportation are suitable for the purpose of transportation and containment of wastes.
3. To ensure that the impact from any possible incident is minimised.
4. To ensure that incidents are reported and controlled according to legislative and company requirements.

2.1.3 Management Strategies

Management Strategy for Objective 1

All operators are to undergo NMG Induction training with Environmental and Incident Reporting and Investigation content.

Operators are to be trained and assessed in all of their required tasks, including load restraint.

In addition, person/s must not, (unless authorised in writing from the appropriate authorities), pollute either surface or sub-surface water sources.

Management Strategies for Objective 2

All containers are to be fit for use as per Company requirements and the NTC Load Restraint Guide. Containers and restraints are to be checked prior to travel and at intervals as per the NMG Load Restraint Procedure.

If any containers are found to be inadequate or damaged, the operator must “Stop the Job” as per NMG Stop the Job Procedure, and report the issue to HSE and Management for actioning.

Management Strategies for Objective 3

All operators that transport Waste products must have an adequate spill kit in their prime mover in the event that a spillage does occur, and must have an understanding of its use.



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All prime movers are to be equipped with serviceable fire extinguishers.

Management Strategy for Objective 4

All incidents or spillages must be reported as per Legislative and NMG time frames, and all Environmental Damage must be contained and rectified in a suitable manner. Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

All reported incidents, no matter how minor, must be included in monthly statistics reporting and reported to Senior Management.

2.1.4 Monitoring

Employees will be responsible for monitoring the serviceability of the machinery/infrastructure under their charge in accordance with daily check requirements.

Rolling Yearly Frequency rates for environmental incidents are to be maintained in monthly statistics and reported to management for consideration.

2.1.5 Reporting

All incidents or spillages must be reported as per Legislative and NMG time frames, and all Environmental Damage must be contained and rectified in a suitable manner. Incidents are to be reported and investigated as per NMG Incident Reporting and Investigation Procedure.

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

All reported incidents, no matter how minor, must be included in monthly statistics reporting and reported to Senior Management.

2.1.6 Corrective Action

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

As per automated Qudos Incident Management System, all corrective actions are to be followed up by Management and only signed off and the Incident Closed Out with Managerial approval.



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2.2 Element OP2 – Air Quality/Dust Control

2.2.1 Policy

The release of dust or particulate matter should not cause environmental nuisance or risk to the environment.

2.2.2 Objectives

Maintain air quality to a suitable standard.

2.2.3 Management Strategies

All containers are to be fit for use as per Company requirements and the NTC Load Restraint Guide. Containers and restraints are to be checked prior to travel and at intervals as per the NMG Load Restraint Procedure.

If any containers are found to be inadequate or damaged, the operator must “Stop the Job” as per NMG Stop the Job Procedure, and report the issue to HSE and Management for actioning.

Operators must have any PPE that may be required to control or protect from an inadvertent release of a product to the atmosphere.

2.2.4 Monitoring

Operators are to Stop the Job immediately if Dust or other particles are observed or otherwise noticed to be entering the atmosphere.

Operators are required to refer to the relevant SDS for the substance and take appropriate action, which may include removing themselves and others from the area, watering down of the substance, or the use of PPE such as dust masks or overalls.

2.2.5 Reporting

All incidents or spillages must be reported as per Legislative and NMG time frames, and all Environmental Damage must be contained and rectified in a suitable manner. Incidents are to be reported and investigated as per NMG Incident Reporting and Investigation Procedure.

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.



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All reported incidents, no matter how minor, must be included in monthly statistics reporting and reported to Senior Management.

2.2.6 Corrective Action

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

As per automated Qudos Incident Management System, all corrective actions are to be followed up by Management and only signed off and the Incident Closed Out with Managerial approval.

2.3 *Element OP3 – Noise*

2.3.1 Policy

Noise created by the activity must not adversely affect persons or the environment in the area of operations.

2.3.2 Objectives

Noise created by the activity must be reduced to as low as reasonably practicable.

2.3.3 Management Strategies

All plant, vehicles and machinery must be maintained in good condition and comply with relevant Australian Standards. All faults are to be reported as per NMG Fault Reporting Procedure.

All plant is to be checked as per Daily Check requirements before the first use of the day.

Complaints must be immediately reported to supervisors or management.

2.3.4 Monitoring

Noise monitoring is to be complaint driven process. In the event that a complaint is received, the NMG Incident Reporting and Investigation Procedure must be followed.



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2.3.5 Reporting

Reporting is a complaint driven process. In the event of a complaint and an investigation of the complaint, a report must be prepared detailing the results of the investigation and comparing the measured noise levels with the noise limits.

All monitoring, reporting, complaints or requests received and actions taken shall be documented.

2.3.6 Corrective Action

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

As per automated Qudos Incident Management System, all corrective actions are to be followed up by Management and only signed off and the Incident Closed Out with Managerial approval.

2.4 Element OP4 - Waste Management

2.4.1 Policy

All wastes generated from operations are to be managed in an environmentally responsible manner and recycled wherever possible.

2.4.2 Objectives

1. To responsibly dispose of and manage wastes generated from operations.
2. To recycle wastes wherever possible.

2.4.3 Management Strategies

Good housekeeping is an integral part of operations and staff shall operate in an appropriate manner.

All waste oil shall be disposed of by a registered waste transport company. All spills are to be cleaned up as per NMG Incident Reporting and Investigation Procedure.

2.4.4 Monitoring

Internal monitoring of waste management performance will be undertaken by the HSE Department. Waste disposal receipts are to be kept for Auditing and Monitoring purposes.



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2.4.5 Reporting

All incidents or spillages must be reported as per Legislative and NMG time frames, and all Environmental Damage must be contained and rectified in a suitable manner. Incidents are to be reported and investigated as per NMG Incident Reporting and Investigation Procedure.

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

All reported incidents, no matter how minor, must be included in monthly statistics reporting and reported to Senior Management.

2.4.6 Corrective Action

All operators and employees found not to be following company procedures relating to the correct disposal of wastes are subject to Disciplinary Action, up to and including dismissal.

2.5 Element OP5 - Hazardous Substances

2.5.1 Policy

All hazardous substances are to be transported, stored and utilised appropriately so as to ensure against spillage.

2.5.2 Objectives

1. To ensure that hazardous substances do not pose a risks to the environment during transportation, storage and use.
2. Material safety data sheets to be available for all hazardous substances being transported, stored and used.

2.5.3 Management Strategies

All hazardous substances will be transported and stored in appropriate containers and bunds, with the correct signage.

Material safety data sheets will be available for all substances.

A spill kit is to be available and spills are to be cleaned up as per NMG Procedures.

Staff will be trained in the use of hazardous substances, PPE and spill handling.

2.5.4 Monitoring

Monitoring of compliance will be undertaken by the HSE and Management.



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2.5.5 Reporting

The site manager must report any non-conformance to the HSE Department.

2.5.6 Corrective Action

Changes to operations will be implemented as required to maintain appropriate hazardous substances management practices.

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

As per automated Qudos Incident Management System, all corrective actions are to be followed up by Management and only signed off and the Incident Closed Out with Managerial approval.

2.6 *Element OP6 - Emergency Response - Spillage*

2.6.1 Policy

All spills are to be contained and cleaned up in a manner as to reduce the effect on the environment.

2.6.2 Objectives

1. To ensure that spills are contained as soon as they occur.
3. To ensure that spills are cleaned up as soon as possible.
4. To ensure that appropriate equipment and training is provided to enable appropriate action to be undertaken.

2.6.3 Management Strategies

Substances shall be stored and transported in approved and suitable containers. Loads are to be checked for adequate restraint and containment prior to and during transportation.

All operators are to be trained in Emergency Response Procedures.

A spill kit and adequate fire extinguisher will be available at all times in all trucks used to transport Waste materials.

2.6.4 Monitoring

Spill kits are to be maintained by HSE personnel and site management.



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2.6.5 Reporting

Spills are to be reported to the Site Manager as soon as they occur.

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

All reported incidents, no matter how minor, must be included in monthly statistics reporting and reported to Senior Management.

2.6.6 Corrective Action

Incidents are to be entered into the company Qudos Incident Reporting system and corrective actions assigned, reviewed and closed out as per company procedures.

As per automated Qudos Incident Management System, all corrective actions are to be followed up by Management and only signed off and the Incident Closed Out with Managerial approval.

2.7 Element OP7 – Staff Training

2.7.1 Policy

All operators are to receive training in the requirements of their required tasks.

2.7.2 Objectives

Prior to commencement of operations all required operators are to receive training in the requirements of this Procedure and any other site specific issues. Only operators that have had the required training and expertise are to undertake Waste Transportation operations.

2.7.3 Management Strategies

The site manager is responsible for providing induction and training to all staff prior to commencement of operations at each site.

All training records are to be kept within the training matrix, and any shortfalls are to be noted. Operators without the required training are not to perform the relevant task.

2.7.4 Recording

Records of all training are to be maintained by the HSE Department.



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3. Closure

The content of this Procedure is to be reviewed on a two yearly time frame. During this review, particular attention should be given to changes in legislation, work operations or work practices, and should reflect new knowledge of relevant processes.

I have read / had read to me this procedure and advise accordingly that I agree with its contents and advice.

Name		Site:
Signature		Date:
Witness		
Signature		Date:

