



***ENVIRONMENTAL
MANAGEMENT PLAN***

IMS-SWI-011.2

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SECTION ONE

ENVIRONMENTAL MANAGEMENT PLAN

1. Introduction

Sea Swift's policy is to manage its operations in a pro-active manner to minimise any impacts from shipping and freight management that includes dangerous goods storage and management practices at the Cairns, Horn Island, Seisia, Weipa, Thursday Island and Northern Territory depots. The organisation has a well-structured environmental program that involves environmental assessment, monitoring, protection and rehabilitation. It strives for continual improvement in the control of its marine and land base operations and encourages all its officers, employees, subcontractors and customers to maintain a healthy operating environment.

The Environmental Management Plan (EMP) provides management strategies and control measures for protecting the environment and minimising the adverse impacts during the organisation's day to day maritime and shore side operations. The EMP will be reviewed and updated as needed to ensure that they reflect any significant changes that may occur within the organisation's operations, and to reflect on changes made to regulatory and advisory rulings from time to time. Sea Swift will seek community, industry and relevant government agency feedback on any major changes to the EMP where appropriate.

Minor changes to the EMP will be carried out throughout the life of the organisation's operations, and these minor revisions will not necessarily be subject to external consultation. Examples of minor changes not requiring consultation are changes in the description or volumes of goods handled by the operation, vessel interchanges, changes to Queensland and Northern Territory Transport Legislation affecting vessel compliance or the incorporation of new environmental information as it becomes available.

Major changes to this document that would be externally consulted include any changes to the Great Barrier Reef Marine Park Legislation, Marine Parks Permit conditions, dangerous goods management and site environmental planning and infrastructure.

2. EMP Objectives

The overall objectives of the EMP are to:

- a. Meet the requirements of all relevant legislation.
- b. Identify potential adverse environmental impacts resulting from operational activities.
- c. Establish procedures, control measures and strategies to minimize adverse environmental impacts and maintain operations to agreed environmental standards.
- d. Provide a system to document that the operational activities are being carried out in an environmentally responsible and sustainable manner.
- e. Provide systems to effectively monitor environmental management throughout the organisation.

3. Definitions

Definitions of terms used in the EMP have been adopted from ANZ ISO 14001:2015 and ANZ ISO14004:2015, and the terms of reference from other legislative and regulative publications.

Terminology	Definition
Environmental Aspect / Element	The activities, processes, products or services of an operation which can interact with the environment and can be controlled.
Potential Environmental Impact	Any change to the environment, wholly or partially resulting from operational activities, products or services.
Environmental Incident	Event(s) that result in direct or indirect adverse impacts to one or more environmental media (e.g. land, air, water), wildlife, or human communities. Such incidents require immediate response to correct and may result in enforcement actions by regulatory authorities or others.
Performance Objective	The target or strategy to be achieved by management.
Management Actions	The actions to be undertaken to achieve the performance objective, including any necessary approvals, applications and consultation.
Performance Indicators	The criteria against which the implementation of the actions and the level of achievement of the performance objectives will be measured.
Monitoring	The process of measuring actual performance.
Responsibility	The assigned responsibility for carrying out each action to a relevant person or organisation, including a process for dealing with complaints about the activity.
Reporting	The process and responsibility for reporting monitored results, including the identification of the agency receiving such reports.
Corrective Action	The action to be implemented in the case of non-compliance and the person or organisation responsible for action.

4. HSEQ Policy

Sea Swift has implemented the Integrated Management System (IMS) Health Safety Environment Quality (HSEQ) policies, which are the overarching document to the system. The policies shall be reviewed every 12 months and reflect on Sea Swift senior management's commitment to safe environmental and other safety and compliance work practices. The HSEQ policies are communicated to all Sea Swift employees and displayed in prominent positions at work sites and on vessels.

OH&S Policy

At Sea Swift, we are committed to a safe place of work, care for our employees and contractors, and good standing in the communities that we operate in. This policy sets out Sea Swift's obligation to Occupational Health and Safety (OH&S), where zero harm is our overall goal.

To accomplish this Sea Swift shall:

- Integrate the IMS OH&S policies, procedures and their principles into our daily operations.
- Regard IMS OH&S management as critical to business success and hold each individual within our business accountable to maintaining the required work ethics and safety standard.
- Maintain the OH&S protection policy with the objective of safety at sea and on shore, prevention of human injury, loss of life and the avoidance of damage to property and equipment.
- Provide the means by which all employees can freely identify and eliminate obstacles to improving the safety of our work, and to the communities in which they operate.
- Train and support all employees in the principles and methods of OH&S management, and continuous improvement in safe work and compliance obligations.
- Ensure that all work standards and practices meet the requirements of legislative and regulative rulings that have an impact on our business.
- Identify our OH&S risk exposures and implement managing systems and controls to mitigate if not eliminate those risks.
- Continue to improve the safety management skills of personnel ashore and aboard marine vessels, including preparation for all emergencies that may arise.
- Ensure all injured or ill employees are managed through our workplace rehabilitation and return to work program.

Fred White

Chief Executive Officer

Environmental Policy

Sea Swift shall conduct its business in a manner that will minimise harm to the environment and the communities in which we operate. Compliance with all environmental laws and regulations is the foundation on which we will build and improve on our environmental performance.

To maintain a responsible approach to managing environmental issues, Sea Swift management shall ensure to:

- Monitor and comply with all environmental laws and relevant industry standards and practices.
- Manage our diverse activities to prevent or minimise pollution and impacts on water, land, flora, fauna, cultural and heritage values.
- Ensure understanding of environmental requirements and implementation of standards among our employees, suppliers and contractors.
- Respond to the environmental concerns of our customers and the communities in which we operate.
- Set and review environmental objectives and targets as part of our business planning activities.
- Monitor and report our environmental progress to our employees and others who are concerned.
- Through the continuous planning cycle, improve our environmental management performance.

Fred White
Chief Executive Officer

Quality Policy

Sea Swift Pty Ltd is committed to meeting with and exceeding the needs and expectations of our clients and customers, by including the principles and objectives of our quality management system within our daily work routines.

The organisation's mission is to deliver a high standard of service to our clients and customers every time and on time.

Our commitment to our quality statements is demonstrated by:

- Complying with legislative obligations, standards and codes of practice applicable to quality and systems management.
- The continual review and improvement to quality management throughout the organisation.
- Ensuring that human and financial resources are available for quality and the Integrated Management System maintenance and support.
- The continual improvement of quality skills and knowledge throughout the Sea Swift work environments.
- Monitoring and evaluating the quality performance of employees and contractors and maintaining a high standard of work.

Fred White

Chief Executive Officer

Customer Service Policy

Sea Swift Pty Ltd is committed to meeting and exceeding the needs and expectations of our customers, by embedding the principles and objectives of our Customer Service system within our daily work routines.

The organisation's mission is to value each and every one of our Customers and to deliver a high standard of service to our clients and customers every time and on time.

In particular, our commitment to Customer Service shall be demonstrated by all staff that have interactions with Customers by doing the following:

- Complying with legislative obligations, standards and codes of practice applicable to customer interaction and freight delivery.
- Having polite and professional interaction with all Customers.
- Having empathy for our Customers and working with them to resolve any disputes or issues in a professional, courteous and timely manner.
- Understanding any specific contractual obligations that relate to Customers and ensuring these are delivered as agreed.
- Reporting and recording deficient deliveries, then analysing and improving the delivery process so as to enhance the Customer experience.
- Key staff meeting with or contacting Customers on a regular basis to monitor accounts and ensure Sea Swift are meeting their obligations, while also seeking feedback on service levels.
- Working with Customers to promote further business opportunities that enhance their business.
- The continual review and improvement to Customer Service throughout the organisation.
- Ensuring that human, IT, and financial resources are available for effective Customer Service and support.
- Monitoring and evaluating the Customer Service performance of employees who interact with our Customers and maintaining a high standard of work.

Fred White
Chief Executive Officer

5. Roles and Responsibilities

To ensure the effectiveness of the EMP, the following roles and responsibilities have been assigned to the nominated Sea Swift positions.

5.1 Chief Executive Officer / General Managers

- Incorporate the operation's environmental management objectives in the organisation's financial planning process.
- Ensure Sea Swift maintains compliance with current environmental legislation and relevant permits and licences.
- Promote overall environmental ethics throughout the organisation.
- Ensure that the EMP is properly and effectively implemented throughout the organisation.
- Report all major environmental incidents to the relevant government agency as soon as practical after the event has occurred.
- Ensure the continual review and improvement of the EMP and approve all its changes.
- Liaise with the community on environmental matters where required.

5.2 Operations Managers

- Promote overall environmental ethics throughout all operations.
- Promote and monitor environmental awareness and its effectiveness within the workgroups under their control.
- Liaise with appropriate internal / external personnel in the event of an environmental incident.
- Implement sound corrective actions to mitigate the risk of unwanted environmental events from reoccurring in the future.
- Assist in environmental audits and inspections for their area of responsibility.
- Ensure appropriate environmental awareness training of staff is completed.
- Ensure environmental risk planning is included in all daily risk and work plans.
- Ensure appropriate environmental monitoring activities are carried out in accordance with the EMP.
- Report all breaches of EMP to the HSEQ Manager and the executive management team as soon as practical after the breach has occurred.

5.3 Ship's Masters / Depot Managers

- Immediately respond to all environmental incidents utilising the appropriate spill response and clean up equipment.
- Periodically review the EMP and assure that the objectives are understood and can be achieved.
- Promote EMP and work instructions to existing and new crew members.
- Report all breaches of EMP to the HSEQ and Marine Manager as soon as practical after the breach has occurred.
- Ensure that activities carried out during operations are conducted in accordance with the EMP, HSEQ procedures and relevant legislative requirements.
- Implement all changes to procedures as they are developed.
- Identify areas of improvement to EMP procedures and instructions and liaise with the HSEQ and Marine Manager to implement improvements.

5.4 Employees and Subcontractors

- Immediately respond to all environmental incidents utilising the appropriate spill response and clean up equipment.
- Follow all work practices in accordance with EMP and relevant legislation, Sea Swift HSEQ policies and procedures at all times.
- Report all breaches to the EMP to the respective Supervisor, Mate, Manager or Master immediately.
- Promote the EMP to others in the workplace.
- Adhere to all changes to HSEQ procedures as they are introduced in the workplace.

5. Communication and Consultation

Environmental issues and the aspects register will be communicated to employees at all levels, through daily and other scheduled HSEQ meetings. Sea Swift management promote the 'top down bottom up' approach to communications management, where employees are given every opportunity to contribute to issues concerning environmental management within the organisation.

The following HSEQ communications methods shall be considered and practiced throughout all Sea Swift operations.

- IMS-FRM-009.3 Employee Suggestion Sheet – employees written suggestions and feedback on all issues concerning HSEQ.
- IMS-FRM-009.5 Daily Communications Form – daily job planning and HSEQ communications sheet.
- IMS-FRM-009.1 Toolbox Talk Template – documented process for verifying toolbox talks with employees on HSEQ and other matters.

- IMS-FRM-009.2 Meeting Minutes Template – documented process for verifying all levels of HSEQ meetings held at Sea Swift.

6. Duty of Care

Under the Environmental Protection Act 1994, all persons have an environmental duty of care. No person must undertake an activity that causes or is likely to cause environmental harm unless they take all reasonable and practicable measures to prevent or minimise that harm. Sea Swift employees are reminded about their duty of care to the environment through the Sea Swift Corporate Induction Process, and regular toolbox talk sessions held at each depot / vessel.

Sea Swift shall comply with all environmental licence, permits and regulations that have been issued in relation to the work tasks or services performed at each site. Compliance to legislative and regulative requirements shall be checked at nominated intervals, through the Sea Swift HSEQ audit process. All non-conformances that are recorded following an audit shall be entered onto the C-Safe database system and have assigned personnel to each action item who will be responsible to manage those actions through to completion. The C-Safe incident and non-conformance database is located on the Sea Swift computer home pages.

7. Training and Competence

Environmental awareness information will be provided to Sea Swift personnel through the corporate and site induction programs and incorporated through other awareness training delivered on and off the sites.

Records of training and inductions will be kept in the Sea Swift C-Safe training database, including details of the training conducted, dates, names and details of the trainer.

Employees engaged in projects where the client has specific environmental procedures in place will participate in all additional training to comply with the project's requirements.

8. External Environmental Reporting

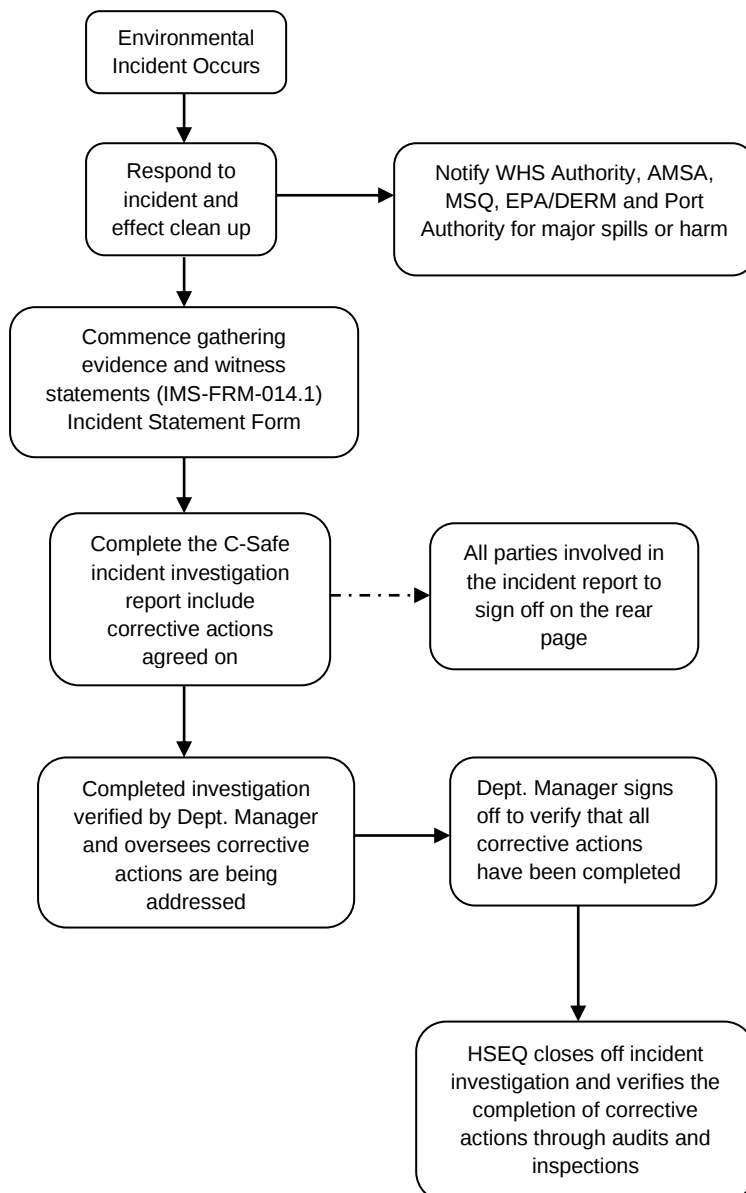
Sea Swift is a registered Controlling Corporation with the National Greenhouse and Energy Reporting scheme and provides annual reports to the government regulator on energy and emissions usage. The HSEQ department is responsible for gathering information on the company's yearly fuel usage figures, calculate and report on all greenhouse and CO₂ emissions as well as energy produced and consumed.

The HSEQ department shall also manage other environmental external reporting to satisfy regulative and legislative requirements, project client's reporting requirements, and other approved interested parties.

9. Incident Reporting and Non-Conformances

All environmental incidents shall be investigated and reported to the HSEQ department, following the requirements of IMS-SOP-014 Incident and Non-Conformance Management.

The following incident management process shall be adhered to when managing environmental incidents.



The HSEQ department shall track all corrective actions that arise from incident reporting, and issue non-conformances for incomplete or overdue corrective actions and incident closures. Managers have the responsibility to ensure their masters, mates and/or supervisors adhere to the requirements of IMS-SOP-014 Incident and Non-Conformance Management.

10. Risk Management

The identification of environmental risks associated with daily and other work tasks or planning shall be assessed and monitored using IMS-FRM-003.1 Job Safety Analysis.

Environmental risks shall be included on the Sea Swift department and organisation risk register. It is the responsibility of Sea Swift department managers to identify all HSEQ hazards that have been identified for their operations area and enter those hazards onto their C-Safe department risk register. Each hazard and its consequence shall be analysed using the risk matrix located with the register, and existing and intended controls (if required) along with responsibilities listed on the register.

Department Managers shall review their C-Safe Risk Registers regularly and ensure that the risks and their controls are communicated to all their employees and contractors. Department risk registers shall be used to populate the Sea Swift corporate risk register.

IMS-FRM-003.1 Job Safety Analysis shall be used to plan work tasks and include consideration for environmental risks that may be associated with the task or its environment. The Job Safety Analysis shall be communicated to those employees required to do the work task prior to the job commencement.

11. Emergency Preparedness and Response

In the event of an unwanted environmental event, the Sea Swift Incident and Non-Conformance Management Procedure (IMS-SOP-014) shall be followed in conjunction with the site Emergency Response Plan. Where a major catastrophe has occurred, the Sea Swift Corporate Emergency Response and Recovery team shall be initialised to control all response and recovery processes that follow the event. All major emergency situations shall be guided by referring to the Corporate Emergency Response and Recovery Plan (IMS-SWI-015.1). Marine environmental incident should be managed in accordance with the Marine Emergency Preparedness Standard Work Instruction (IMS-SWI-020.26).

12. Review

This plan shall be reviewed in accordance with the Sea Swift Document, Records and Data Control procedure (IMS-SOP-008). The current version of the document shall be shown on each page header, which can be verified to the currency listed in the Document Control Register.

SECTION TWO

SITE BASED ENVIRONMENTAL PLANS

CAIRNS DEPOT

***Sea Swift Head Office, Freezer/Chiller Area,
Lot 27 and Masons Wharf***



Hydrocarbon Management

1.1 Identified Risks

The following risks have been identified at the depot, for the storage, handling and transfers of combustible liquids.

- a) Fire causing the uncontrolled release onto the ground and/or waterways of hydrocarbons.
- b) Failure of combustible liquids storage tank or oil containers causing release of hydrocarbons to the ground and/or waterways.
- c) Diesel spills during equipment refuelling where fuel spills onto the ground and drains, where it has the potential to flow off site and into the water ways.

1.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Firefighting equipment is installed and maintained on site; regular fire and evacuation drills carried out on site; contracted fire equipment maintenance carried in accordance with the relevant Australian Standard; employees participate in spill response and clean-up process awareness drills; spill kits are located throughout the site.
- b) Diesel and oil storage area is located away from hot work / heat sources in an elevated bunded area. Smoking is banned within the confines of the Sea Swift depot and in all mobile equipment.
- c) Diesel and oil are stored in a covered section near the Engineering department, and all sits on a bunded platform that drains back into a controlled area within the engineering shed. This area is designed for wash down / oil separation tasks and is fully bunded to capture spills.
- d) Refuelling of all forklifts and vehicles is carried out in the bunded wash down area where any spillage is captured and controlled.

1.3 Monitoring

Internal HSEQ inspections are carried out by the Engineering HSR and random checks completed by the HSEQ team. Fuel / Oil storage and transfer non-conformances are reported in C-Safe, and actions are assigned to depot employees to manage through to its completion.

1.4 Emergency Response

Any uncontrolled release of hydrocarbons shall be immediately reported to the department Emergency Warden or Supervisor, and the following actions should take place.

- Attempt to stop the leak at the source (close the fuel valve or tip up leaking oil drum to stop the flow).
- Report the spill to the responsible Manager as soon as practicable, while deploying spill kits and booms. (Refer to IMS-SWI-015.2 Cairns Emergency Response Plan).
- Department or HSEQ Manager to notify external agencies if applicable (where the hydrocarbon spill has flowed off-site).
- Manage spill onsite and commence clean up after the spill is controlled. Contaminated absorbent material is collected and disposed of in accordance with local council rulings.
- Complete incident investigation and reporting after the site is controlled.

2. Waste Management

2.1 Identified Risks

The following risks have been identified at the site, for waste management.

- a) Liquid spills near surface drains in the yard areas has the potential if not controlled, to flow off site and enter the waterways near the main office and yard areas, and at the coastal area at the Freezer / Chiller area. Solid waste such as freight wrappings including plastics may drift off site if not immediately contained, and cause harm to the marine and coastal ecosystem.
- b) Many of the waste products generated during vehicle and other equipment servicing and maintenance activities are classified as "Regulated Waste" under the Environmental Protection Act and must be disposed of in an appropriate manner. A control strategy table is shown in 3.3 below and lists the disposal methods of all waste products from the Cairns depot site.
- c) The inclusion of wharf waste management transfers where vessel general refuse and liquid regulated waste are transferred shore side for removal and disposal. Liquid waste such as sewerage, bilge water and vessel engine lubricants if not controlled, have the potential to cause harm to the marine and coastal ecosystem. Solid waste being transferred off the vessel or dislodging away from freight on-board if not controlled, may reduce the aesthetic value of the wharf / landing areas as well as pollute the waterways.

2.2 Waste Management Aim

The aim of the waste management process adopted by Sea Swift is to:

- a) Maintain an aesthetic appeal of the depot area and habitat of the surrounding environment by ensuring that no wastes are disposed on or adjacent to the site.
- b) Prevent the mixing of waste streams.
- c) Identify and correctly dispose of those waste products identified as “Regulated Wastes” under schedule 7 of the Environmental Protection Regulation 2008.
- d) Implement waste tracking procedures for those products identified as “Trackable Waste” under schedule 1 of the Environmental Protection (Waste Management) Policy and Regulation 2000.
- e) Reduce the waste stream volumes across the depot by introducing innovative programs such as the ‘Reuse, Recycle, Reduce’ methodology.

2.3 Control Strategies

Waste products will be collected and disposed of as follows.

Waste Product	Regulated	Disposal Method
Waste Oil (workshop)	Yes	Collected in steel containers and decanted into bulk bunded storage container where it will be collected by a licensed regulated waste contractor.
Waste Oil (vessels)	Yes	Collected from the wharf by a licensed regulated waste contractor.
Bilge Water from Vessels	Yes	Collected in steel containers by engineering staff and brought back to the engineering workshop where it is separated in the bunded area where the oil is collected by a licensed regulated waste contractor.
Used Oil Filters	Yes	Collected in drums at the site where it will be collected by a licensed regulated waste disposal contractor. Oil is removed from the filters prior to their collection and transferred to the waste oil collection areas.
Oily Rags	Yes	Stored in bins where it will be collected by a licensed regulated waste disposal contractor.

Waste Product	Regulated	Disposal Method
Used Absorbent Material	Yes	Spills affecting small volumes with absorbent material. The contaminated soil/dirt and the absorbent material will be stored in labelled containers containing not more than 100kg of material for a minimum of 28 days. It will then be disposed of at the local council landfill dump. NOTE: Providing the maximum lot is not exceeded, absorbent material breaks oil down to a form where it is not considered "Regulated" under EP Act, in approximately 28 days.
Lead Acid Batteries	Yes	Collected and stored within a specified area for removal by a licensed regulated waste contractor in Cairns.
Sewage	Yes	Sewage will be confined in vessel sullage tanks will be pumped out by licensed regulated waste disposal contractors as required. Vessels at regulated distances at sea are able to open sullage tank valves and dispose of sewage at sea. Sewage at the site is managed through council approved waste system.
Sanitary Waste	No	Sanitary waste will be collected in containers and disposed of at approved waste site.
Empty Drums and other containers.	No	They can be reused for oily waste collection if required, or the remaining product removed from the drums and the drums collected by a contractor for recycling.
Scrap Metal	No	Scrap metals are separated and stored at the site for reuse or collection by recycling contractors.
Vehicle / Equipment Tyres	No	Tyres are recovered by tyre fitting contractors who visit the site to change out worn or repair vehicle or equipment tyres. Some tyres are recycled and used by the vessels as fenders.
Scrap Wood	No	Scrap wooden packaging will be reused where possible, otherwise it will be collected in a skip for recycling or disposal by a contractor.
Non-recyclable solid waste	No	Stored at the site for removal and disposal at the local waste site.
Waste office paper	No	All waste office paper generated will be reused where possible or collected by a contractor for recycling.

3. Stormwater Management

3.1 Identified Risks

The following risks have been identified at the site, for stormwater management.

- a) Heavy rains wash soiled (oiled / minor spillage) areas of the yard surface off site into water ways.
- b) Heavy rain washes loose freight wrappings and other refuse off site into drains and pollutes nearby waterways or blocks drains.

3.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Minor spills on yard surfaces are immediately attended to and liquids treated with absorbent material. Absorbent material is removed and disposed of once all liquids have been removed.
- b) The yard surfaces are swept with an industrial sweeper attached to a Bobcat Loader, and all surface dirt that is collected is emptied into an industrial skip and removed off site.
- c) The departments conduct regular daily / weekly yard surface clean up and dispose of all surface rubbish into skips and bins. All stormwater drains are regularly checked for debris build up and/or blockages.

3.3 Monitoring

Depot Health Safety Representatives (HSR's) conduct scheduled HSEQ inspections and audits will identify areas of concern. Corrective actions are issued as a result of non-conformances identified during the inspection, and a responsible person assigned to manage the action through to completion.

4. Air Quality (Dust)

4.1 Identified Risks

The following risk has been identified at the site, for air quality.

- a) There is potential for ground dust to be generated at the site, during hot dry periods and increased vehicle traffic movement in the yard.
- b) Increase in welding or grinding tasks in the engineering workshop areas may have an impact on the air quality in the immediate areas of the workshop.

4.2 Controls Implemented

The following controls related to the risk as detailed above have been implemented at the site.

- a) Traffic speed limits are in place at the depot; limited traffic movement around maintenance and office sites; yard and workshop areas are regularly cleaned down and all loose dirt and/or rubbish removed.
- b) Welding and grinding tasks are conducted in designated areas of the workshop which are well ventilated and have fans to move the air more in still conditions. Air quality of these areas are monitored by the engineering HSR and the employees consulted on additional controls that can be implemented if the air quality has been impacted on.

4.3 Monitoring

The department HSR with the HSEQ representatives shall monitor all air quality at the yard and in the engineering workshop and adopt the above control measures where dust is affecting work areas, customers or neighbouring properties.

5. Noise

5.1 Identified Risks

The following risk has been identified at the site, for noise.

- a) Noise from maintenance activities at the workshop impacts on nearby employees in the yard or the nearest neighbouring properties.
- b) Noise from machinery operations within the site impacts on employees or the nearest neighbouring properties.

5.2 Controls Implemented

- a) Noise emitting equipment used in the workshop is either located away from main work areas or used for short periods of time; noise levels reduced due to the distance of workshop to the yard employee's work areas; noise levels are reduced to neighbouring properties due to equipment confinement in workshop and distance. Noise monitoring surveys are scheduled across high risk areas identified at the depot, or on demand where concerns are raised / identified.
- b) Mobile equipment noise is reduced by maintaining vehicles to the required Queensland traffic standards; equipment / traffic noise exposures in the depot is minimised by segregated work areas away from noise sources and the limited time traffic is in the yard.

5.3 Monitoring

Noise levels are monitored at the site, through HSEQ inspections and Supervisors / Managers observations during work hours. Equipment used on the site is maintained by the engineering department.

6. Hazardous / Dangerous Goods

6.1 Identified Risks

The following risk has been identified at the site, for hazardous and/or dangerous goods that may be held or used at the depot.

- a) Hazardous or dangerous goods freight that is received and held at the depot before being loaded onto a vessel may leak or be damaged in transit, and spill into the drains causing harm to the coastal waterways and the ecosystem.
- b) Minor hazardous liquids or solids used at the depot that is not disposed of in accordance with its Safety Data Sheet, and if disposed of in drains, causing harm to coastal waterways the ecosystem.

6.2 Controls Implemented

- a) Employees responsible for handling customer hazardous / dangerous goods attend awareness training and only deal with minor volumes of hazardous substances at the depot; bulk hazardous substances are delivered directly to the wharf and loaded onto the awaiting vessel.
- b) A bunded quarantine area has been established in the operations yard area, where leaking or unfit hazardous substance containers can be moved to and stored until their removal off site by the customer or regulated waste contractor.
- c) The chemical management program 'Chemwatch' is available in all departments within the depot to assist employees with instructions on the safe disposal of substances. The engineering department has a bunded collection point, where hazardous / dangerous goods can be decanted and stored until collection by a regulated waste contractor.

6.3 Monitoring

Department HSR's and Supervisors conduct scheduled inspections of their respective areas, and report on hazardous substance / dangerous goods non-conformances. Employees participate in toolbox talks and other information / training sessions for the safe handling of hazardous and dangerous goods.

7. Reducing the Carbon Footprint

7.1 Identified Opportunities

The following opportunities has been identified at the depot, for positively participating in reducing the company's carbon footprint.

- a) Reducing the use of paper and printed material.
- b) Recycling / reusing materials for freight management and engineering maintenance at the depot.
- c) Reduce the essential resource usage (fuels, electricity and water).

7.2 Controls Implemented

- a) Employees at the depot are encouraged to reduce the amount of printed materials by using the email system to pass on information that would have been printed; print double sided where possible to reduce paper usage; control printing outputs to only printing what is necessary.
- b) Employees are encouraged to recycle non-confidential printed paper for their notetaking; printed paper that cannot be used is placed in a recycle bin. Confidential documents are shredded and/or placed in recycle bins and collected by a recycling contractor.
- c) Freight packaging material is reused where possible; wooden pallets are repaired and returned for use; wood from unrepairable pallets is placed in a specific skip and collected by a recycling contractor.
- d) The engineering department has championed the recycle / reuse of vessel / equipment parts and metals to assist in reducing the maintenance costs for the depots. Used drums and other unusable metal is collected by a recycling contractor.
- e) Fuel burning company equipment is regularly maintained to ensure the efficient use of fuels; vessel fuel usage is monitored and reported on monthly.
- f) Employees are encouraged to turn off electrical items when not in use; lights and air-conditioners in rooms are turned off after their use or if not needed; air-conditioning temperatures are set moderately so that less electricity is used to cool areas.
- g) The reduction of water usage for cleaning purposes is encouraged at the depot; areas are swept out rather than being hosed down.

7.3 Monitoring

Each department is challenged to assist in reducing the company's carbon footprint.

HORN ISLAND



1. Hydrocarbon Management

1.1 Identified Risks

The following risks have been identified at the site, for the storage, handling and transfers of flammable and combustible liquids.

- a) Fire / Explosion causing the uncontrolled release onto the ground and/or waterways of hydrocarbons.
- b) Failure in the fixed or portable piping and hoses used to transfer fuels into tanks and machinery, causing release of hydrocarbons to the ground and/or waterways.
- c) Failure of dangerous goods storage tank or containers causing release of hydrocarbons to the ground and/or waterways.
- d) Deterioration of tank farm bunding causing release of hydrocarbons to the ground and/or waterways.
- e) Breakdown or failure of hydrocarbon pumping equipment releasing product onto the ground or in waterways.

1.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Firefighting equipment including 2x50 litre cylinders of foam installed and maintained on site; regular fire and evacuation drills carried out on site; contracted fire equipment maintenance carried in accordance with the relevant Australian Standard; employees participate in spill response and clean-up process awareness drills; spill kits are located throughout the site.
- b) Fixed and portable piping and hoses are tested and certified by NQPetro; continuing maintenance program on all hoses and pipes at the depot that show the current test tags; engineering repair and maintenance crew on site to administer the maintenance program, spill kits on site.
- c) Periodic audit and inspection of tanks and facility by regulator and/or representatives; site inspections and integrity checks, bund protection around large storage facility, spill kits on site.
- d) Maintenance program for all site equipment by internal and external specialist contracting organisation; site inspections, spill kits on site.

1.3 Monitoring

Depot staff at Horn Island are to adhere and respond to all HSEQ inspections, audits and their corrective actions.

The Operations department Manager has the overall responsibility to ensure that the requirements of regulative licence and permits at the Horn Island depot are adhered to at all times. Internal / external audit corrective actions shall be monitored through to completion.

1.4 Emergency Response

Any uncontrolled release of hydrocarbons shall be immediately reported to the Emergency Warden or Horn Island depot Manager, and the following actions should take place.

- Attempt to stop the leak at the source (shut down pumping equipment, close valves or isolate piping).
- Report the spill to the depot Manager as soon as practicable, while deploying spill kits and booms. (Refer to IMS-SWI-015.3 Horn Island Emergency Plan).
- Depot manager to notify external agencies if applicable (See IMS-SWI-015.3 Horn Island Emergency Plan).
- Manage spill onsite and commence clean up after the spill is controlled. Contaminated soil is to be removed off site and disposed of in accordance with local council rulings.
- Complete incident investigation and reporting after the scene is controlled.

2. Stormwater Management

2.1 Identified Risks

The following risks have been identified at the site, for stormwater management.

- a) Stormwater inundates the fuel farm bund area and deposits oily water around the fuel farm and/or off site.
- b) Heavy rains wash soils from yard and workshop areas off site into water ways.

2.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Oil separators are connected to the fuel farm bund area that will activate on higher water levels in the bund area, drains located outside the fuel farm to channel excess water away from the installation.
- b) Drainage system implemented onsite to control surface water; yard soil is porous and can soak in surface water.

2.3 Monitoring

Depot HSEQ inspections and audits will identify areas of concern during wet season rainfalls. Oils separators connected to the fuel farm bunded area are serviced regularly and tested against heavy rainfall.

2.4 Emergency Response

In the case of severe flooding at the site, the Sea Swift Corporate Emergency Response and Recovery Plan will be initiated, and immediate preventative and corrective actions implemented to prevent pollutants from being inundated by water washed off site. A pre-cyclone checklist has been developed for the site that includes preparation for tidal surges.

Should heavy rain inundation threaten the site, the following should occur.

- Fuel / oil storage tanks are to be checked for their integrity and stability during high waters.
- Unstable fuel / oil containers (e.g. IBC's) are to be either drained into larger more stable tanks or removed off site to higher ground or another site.
- The site cleaned of loose containers and other material that could have the potential of being shifted or pollute the surrounding area.
- Depot Manager to complete all preparation checks and remain in contact with the Department Manager.

3. Waste Management

3.1 Identified Risks

The following risks have been identified at the site, for waste management.

- a) Solid and liquid waste may detract from the amenity of the area and have the potential to contaminate land and waterways.
- b) Many of the waste products generated during servicing and maintenance activities are classified as "Regulated Waste" under the Environmental Protection Act and must be disposed of in an appropriate manner.

3.2 Waste Management Aim

The aim of the waste management process adopted by Sea Swift is to:

- a) Maintain an aesthetic appeal of the depot area and habitat of the surrounding environment by ensuring that no wastes are disposed on or adjacent to the site.
- b) Prevent the mixing of waste streams.

- c) Identify and correctly dispose of those waste products identified as “Regulated Wastes” under schedule 7 of the Environmental Protection Regulation 2008.
- d) Implement waste tracking procedures for those products identified as “Trackable Waste” under schedule 1 of the Environmental Protection (Waste Management) Regulation 2000.

3.3 Control Strategies

Waste products will be collected and disposed of as follows.

Waste Product	Regulated	Disposal Method
Waste Oil	Yes	Collected in waste oil drums and taken from the vessels / workshop and decanted into bulk bunded storage container where it will be returned to Cairns and collected by a licensed regulated waste contractor.
Used Oil Filters	Yes	Collected in drums at the site and returned to Cairns where it will be collected by a licensed regulated waste disposal contractor. NOTE: Oil is removed from the filter prior to collection in the used oil filter bin.
Oily Rags and Used Absorbent Material	Yes	Stored in bins at the site and returned to Cairns where it will be collected by a licensed regulated waste disposal contractor.
Soils contaminated by hydrocarbons	Yes	Spills affecting small volumes with absorbent material. The contaminated soil and the absorbent material will be stored in labelled containers containing not more than 100kg of material for a minimum of 28 days. It will then be disposed of at the local council landfill dump. NOTE: Providing the maximum lot is not exceeded, absorbent material breaks oil down to a form where it is not considered “Regulated” under EP Act, in approximately 28 days.
Lead Acid Batteries	Yes	Collected in a designated waste battery container for collection by a licensed regulated waste contractor in Cairns.
Sewage	Yes	Sewage will be confined in vessel sullage tanks will be pumped out by licensed regulated waste disposal contractors as required. Sewage at the site is managed through council approved waste system.

Waste Product	Regulated	Disposal Method
Sanitary Waste	No	Sanitary waste will be collected in containers and disposed of at approved waste site.
Empty Drums and other containers.	No	They will be reused for oily waste collection and removal and returned to Cairns where the product will be removed, and the drums crushed and transported off site for recycling.
Scrap Metal	No	Scrap metals are separated and stored at the site for reuse or collection by recycling contractors.
Scrap Wood	No	Scrap wooden packaging will be reused where possible, otherwise it will be segregated and disposed of at the local council waste disposal facility.
Non-recyclable solid waste	No	Stored at the site for removal and disposal at the local waste site.
Waste office paper	No	All waste office paper generated will be collected and recycled where possible.

4. Air Quality (Dust)

4.1 Identified Risks

The following risk has been identified at the site, for air quality.

- a) There is potential for ground dust to be generated at the site, during hot dry periods and increased vehicle traffic movement in the yard.

4.2 Controls Implemented

The following controls related to the risk as detailed above have been implemented at the site.

- a) Traffic speed limits are in place at the site; limited traffic movement around maintenance and office sites; water down main traffic areas.

4.3 Monitoring

The depot Manager shall monitor all air quality at the yard and adopt the above control measures where dust is affecting work areas, customers or neighbouring properties.

5. Noise

5.1 Identified Risks

The following risk has been identified at the site, for noise.

- a) Noise from maintenance activities at the workshop impacts on nearby employees in the yard or the nearest neighbouring properties.
- b) Noise from machinery operations within the site impacts on employees or the nearest neighbouring properties.

5.2 Controls Implemented

- a) Noise emitting equipment used in the workshop is either located away from main work areas or used for short periods of time; noise levels reduced due to the distance of workshop to the yard employee's work areas; noise levels are reduced to neighbouring properties due to equipment confinement in workshop and distance.
- b) Mobile equipment noise is reduced by maintaining vehicles to the required Queensland Traffic Standards, equipment traffic in the yard minimised by work area locations and vehicle usage.

5.3 Monitoring

Noise levels are monitored at the site, through HSEQ inspections and Supervisors / Managers observations during work hours. Equipment used on the site is maintained by the resident mechanics.

6. Hazardous / Dangerous Goods

6.1 Identified Risks

The following risk has been identified at the site, for hazardous and/or dangerous goods that may be held or used at the depot.

- a) Hazardous or dangerous goods freight that is received and held at the depot before being loaded onto another vessel or delivered to the customer may leak or be damaged in transit, and spill into the drains causing harm to the coastal waterways and the ecosystem.
- b) Minor hazardous liquids or solids used at the depot that is not disposed of in accordance with its Safety Data Sheet, and if disposed of in drains, causing harm to coastal waterways the ecosystem.

6.2 Controls Implemented

- a) Employees responsible for handling customer hazardous / dangerous goods attend awareness training

- b) A bunded quarantine area is located in the yard area, where leaking or unfit hazardous substance containers can be moved to and stored until their removal off site.
- c) The chemical management program 'Chemwatch' is available in all depots to assist employees with instructions on the safe disposal of substances.

6.3 Monitoring

Depot Manager / Supervisor conduct scheduled inspections of the depot, and report on hazardous substance / dangerous goods non-conformances. Employees participate in toolbox talks and other information / training sessions for the safe handling of hazardous and dangerous goods.

7. Reducing the Carbon Footprint

7.1 Identified Opportunities

The following opportunities has been identified at the depot, for positively participating in reducing the company's carbon footprint.

- a) Reducing the use of paper and printed material.
- b) Recycling / reusing materials for freight management and engineering maintenance at the depot.
- c) Reduce the essential resource usage (fuels, electricity and water).

7.2 Controls Implemented

- a) Employees at the depot are encouraged to reduce the amount of printed materials by using the email system to pass on information that would have been printed; print double sided where possible to reduce paper usage; control printing outputs to only printing what is necessary.
- b) Employees are encouraged to recycle non-confidential printed paper for their notetaking. Confidential documents are shredded and recycled.
- c) Freight packaging material is reused where possible; wooden pallets are repaired and returned for use.
- d) The engineering section at the depot recycle / reuse equipment parts and metals to assist in reducing the maintenance costs. Oil and other product drums are reused where possible.
- e) Fuel burning company equipment is regularly maintained so as to ensure the efficient use of fuels.

- f) Employees are encouraged to turn off electrical items when not in use; lights and air-conditioners in rooms are turned off after their use or if not needed.
- g) The reduction of water usage for cleaning purposes is encouraged at the depot.

7.3 Monitoring

Each department is challenged to assist in reducing the company's carbon footprint.

THURSDAY ISLAND / SEISIA DEPOTS



1. Hydrocarbon Management

1.1 Identified Risks

The following risks have been identified at both sites, where the hydrocarbon storage area is off-site and there is only minor storage of combustible liquids at each site. The bulk storage of combustible liquids is located in yard areas away from the depots and are included in this risk setting.

- a) Failure of combustible liquid storage tank or containers causing release of hydrocarbons to the ground and/or waterways.
- b) Spills by employees responsible for the transfer of combustible liquids at the storage yard or depots, causing the release of hydrocarbons on the ground or in nearby waterways.
- c) Fire at the storage or refuelling points, causing damage to structures and equipment and the release of hydrocarbons into the nearby waterways.

1.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Day fill tanks are fully bunded in both depot locations and located in an area away from main traffic flow to prevent damage.
- b) All fuel storage tanks, and vehicle transfer tanks comply with the relevant Australian Standards and local council / inspectorate requirements and are maintained.
- c) Employees participate in spill response and clean-up process awareness drills; spill kits are located throughout the sites.
- d) Employees responsible for combustible fuel transfers hold relevant license for dangerous goods management.
- e) Regular HSEQ inspections are being conducted at the depots that includes fuel storage areas.
- f) No smoking rule applies at all depots in and around fuel storage and transfer areas. Equipment is switched off whilst refuelling, and any hot work that is planned near the areas must be risk assessed and permit to work issued prior to work commencing.

1.3 Monitoring

Depot staff at Thursday Island and Seisia are to adhere and respond to all HSEQ inspections, audits and their corrective actions.

The Operations department Manager has the overall responsibility to ensure that the requirements of regulative licence and permits at the Thursday Island and Seisia depots are adhered to at all times. Internal / external audit corrective actions shall be monitored through to completion.

1.4 Emergency Response

Any uncontrolled release of hydrocarbons shall be immediately reported to the Emergency Warden or depot Manager's at both sites, and the following actions should take place.

- Attempt to stop the leak at the source (shut down pumping equipment or close valves).
- Report the spill to the depot Manager as soon as practicable, while deploying spill kits and booms. (Refer to IMS-SWI-015.4 Seisia Emergency Plan and the Thursday Island Ports North Emergency Plan).
- Depot manager to notify external agencies if applicable.
- Manage spill onsite and commence clean up after the spill is controlled. Contaminated soil is to be removed off site and disposed of in accordance with local council rulings.
- Complete incident investigation and reporting after the scene is controlled.

2. Stormwater Management

2.1 Identified Risks

The following risks have been identified at the Thursday Island and Seisia depots for stormwater management.

- a) Stormwater inundates the fuel storage area and deposits oily water around the yard and/or off site through drain systems.
- b) Heavy rains wash soils from yard and workshop areas off site into water ways.

2.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Drainage system implemented onsite at the Thursday Island depot to control surface water. Bulk yard storage areas and the Seisia depot area has porous soils that will can soak in surface water to an extent.
- b) Depots conduct site maintenance that ensures all drains are kept free of materials that could cause blockages in storm water release.

2.3 Monitoring

Depot HSEQ inspections and audits will identify areas of concern during wet season rainfalls. Hydrocarbon spills are cleaned up and any contaminated soils are either treated or removed off site.

2.4 Emergency Response

In the case of severe flooding at the site, the Sea Swift Corporate Emergency Response and Recovery Plan will be initiated, and immediate preventative and corrective actions implemented to prevent pollutants from being inundated by water washed off site. A pre-cyclone checklist has been developed for the site that includes preparation for tidal surges.

Should heavy rain inundation threaten the site, the following should occur.

- Fuel / oil storage tanks are to be checked for their integrity and stability during high waters and/or strong winds.
- Unstable fuel / oil containers (e.g. IBC's) are to be either drained into larger more stable tanks or removed off site to higher ground or another site.
- The site cleaned of loose containers and other material that could have the potential of being shifted or pollute the surrounding area.
- Depot Manager to complete all preparation checks and remain in contact with the Department Manager.

3. Waste Management

3.1 Identified Risks

The following risks have been identified at the site, for waste management.

- a) Freight packaging materials that dislodge and litter the depot areas and can be blown or washed off-site into nearby waterways.
- b) Disused equipment left on site that affects the aesthetic outlook of the depot.
- c) Scrap material left in the depots from servicing / repair tasks that if not controlled may breakdown into the soils or be washed off site by storm waters.

3.2 Waste Management Aim

The aim of the waste management process adopted by Sea Swift is to:

- a) Maintain an aesthetic appeal of the depot area and habitat of the surrounding environment by ensuring that no wastes are disposed on or adjacent to the site.
- b) Prevent the mixing of waste streams.
- c) Identify and correctly dispose of those waste products identified as "Regulated Wastes" under schedule 7 of the Environmental Protection Regulation 2008.
- d) Implement waste tracking procedures for those products identified as "Trackable Waste" under schedule 1 of the Environmental Protection (Waste Management) Regulation 2000.

3.3 Control Strategies

Waste products will be collected and disposed of as follows.

Waste Product	Regulated	Disposal Method
Waste Oil	Yes	Collected in waste oil drums and taken from the depots and decanted into bulk bunded storage container where it will be returned to Cairns and collected by a licensed regulated waste contractor.
Used Oil Filters	Yes	Oil is drained from the filters and they are disposed of in the regulated waste area of the local landfill.
Used Absorbent Material	Yes	Stored in bins at the site and returned to Cairns where it will be collected by a licensed regulated waste disposal contractor.
Soils contaminated by hydrocarbons	Yes	Spills affecting small volumes with absorbent material. The contaminated soil and the absorbent material will be stored in labelled containers containing not more than 100kg of material for a minimum of 28 days. It will then be disposed of at the local council landfill dump. NOTE: Providing the maximum lot is not exceeded, absorbent material breaks oil down to a form where it is not considered "Regulated" under EP Act, in approximately 28 days.
Lead Acid Batteries	Yes	Deposited in the recycling section of the local council landfill sites.
Sewage	Yes	Sewage at the Seisia depot is held in storage tanks and pumped out by licensed regulated waste disposal contractors as required. Septic system in place at the Thursday Island depot and is managed by Ports North.
Sanitary Waste	No	Sanitary waste will be collected in containers and disposed of at approved waste site.
Empty Drums and other containers.	No	They will be reused for oily waste collection and removal and returned to Cairns where the product will be removed, and the drums crushed and transported off site for recycling.
Scrap Wood	No	Scrap wooden packaging will be reused where possible, otherwise it will be segregated and disposed of at the local council waste disposal facility.
Non-recyclable solid waste	No	Stored at the site for removal and disposal at the local waste site.

Waste Product	Regulated	Disposal Method
Waste office paper	No	All waste office paper generated will be collected and recycled where possible.

4. Air Quality (Dust)

4.1 Identified Risks

The following risk has been identified at the site, for air quality.

- a) There is potential for ground dust to be generated at the Seisia Depot, during hot dry periods and increased vehicle traffic movement in the yard.

4.2 Controls Implemented

The following controls related to the risk as detailed above have been implemented at the site.

- a) Traffic speed limits are in place at the site; limited traffic movement around maintenance and office sites; water down main traffic areas.

4.3 Monitoring

The depot Manager shall monitor all air quality at the yard and adopt the above control measures where dust is affecting work areas, customers or neighbouring properties.

5. Noise

5.1 Identified Risks

The following risk has been identified at the site, for noise.

- a) Noise from machinery operations within the site impacts on employees or the nearest neighbouring properties.

5.2 Controls Implemented

- a) Mobile equipment noise is reduced by maintaining vehicles to the required Queensland Traffic Standards, equipment traffic in the yard minimised by work area locations and vehicle usage.
- b) Both depots are located some distance away from neighbouring businesses and residential areas.

5.3 Monitoring

Noise levels are monitored at the site, through HSEQ inspections and Supervisors / Managers observations during work hours. Equipment used on the site is maintained by the engineering resident mechanics at Horn Island.

6. Hazardous / Dangerous Goods

6.1 Identified Risks

The following risk has been identified at the site, for hazardous and/or dangerous goods that may be held or used at the depot.

- c) Hazardous or dangerous goods freight that is received and held at the depot before being loaded onto another vessel or delivered to the customer may leak or be damaged in transit, and spill into the drains causing harm to the coastal waterways and the ecosystem.
- d) Minor hazardous liquids or solids used at the depot that is not disposed of in accordance with its Safety Data Sheet, and if disposed of in drains, causing harm to coastal waterways the ecosystem.

6.2 Controls Implemented

- d) Employees responsible for handling customer hazardous / dangerous goods attend awareness training
- e) A bunded quarantine area is located in the Thursday Island yard area, where leaking or unfit hazardous substance containers can be moved to and stored until their removal off site. Designated quarantine site located at the Seisia depot.
- f) The chemical management program 'Chemwatch' is available in all depots to assist employees with instructions on the safe disposal of substances.

6.3 Monitoring

Depot Manager / Supervisor conduct scheduled inspections of the depot, and report on hazardous substance / dangerous goods non-conformances. Employees participate in toolbox talks and other information / training sessions for the safe handling of hazardous and dangerous goods.

7. Reducing the Carbon Footprint

7.1 Identified Opportunities

The following opportunities has been identified at the depot, for positively participating in reducing the company's carbon footprint.

- a) Reducing the use of paper and printed material.
- b) Recycling / reusing materials for freight management and engineering maintenance at the depot.
- c) Reduce the essential resource usage (fuels, electricity and water).

7.2 Controls Implemented

- a) Employees at the depots are encouraged to reduce the amount of printed materials by using the email system to pass on information that would have been printed; print double sided where possible to reduce paper usage; control printing outputs to only printing what is necessary.
- b) Employees are encouraged to recycle non-confidential printed paper for their notetaking. Confidential documents are shredded and recycled.
- c) Freight packaging material is reused where possible; wooden pallets are repaired and returned for use.
- d) The engineering section working at both depots, recycle / reuse equipment parts and metals to assist in reducing the maintenance costs. Oil and other product drums are reused where possible.
- e) Fuel burning company equipment is regularly maintained so as to ensure the efficient use of fuels.
- f) Employees are encouraged to turn off electrical items when not in use; lights and air-conditioners in rooms are turned off after their use or if not needed.
- g) The reduction of water usage for cleaning purposes is encouraged at the depot.

7.3 Monitoring

Each department is challenged to assist in reducing the company's carbon footprint.

WEIPA DEPOT



1. Hydrocarbon Management

1.1 Identified Risks

The following risks have been identified at the Weipa depot where the fuelling of the depot forklift is carried out manually, with fuel containers used to refuel equipment. There is no bulk storage of fuels at the site.

- a) Spills by employees responsible for the transfer of combustible liquids at the depots, causing minor release of hydrocarbons on the ground.

1.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Employees participate in spill response and clean-up process awareness drills; spill kit is located at the sites.
- b) Fit for purpose fuel container used when refuelling the forklift.

1.3 Monitoring

The Weipa depot manager shall monitor all equipment refuelling tasks and ensure that the required controls are in place and the task is managed responsibly.

1.4 Emergency Response

Any uncontrolled release of hydrocarbons shall be immediately reported to the Emergency Warden or depot Manager, and the following actions should take place.

- Attempt to stop the leak at the source (stand the fuel container up/close lid).
- Report the spill to the depot Manager as soon as practicable, while deploying spill kits absorbent material on the spill. (Refer to IMS-SWI-015.5 Weipa Depot Emergency Plan).
- Manage spill onsite and commence clean up after the spill is controlled. Contaminated soil is to be removed off site and disposed of in accordance with local council rulings.
- Complete incident investigation and reporting after the scene is controlled.

2. Stormwater Management

2.1 Identified Risks

The following risks have been identified at the Weipa depots for stormwater management.

- a) Stormwater inundates the yard and washes soil and surface rubbish off site through drain systems.

2.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the depot.

- a) Complex owners made aware of any drainage problems that occur during heavy rain.
- b) Depots conduct site maintenance that ensures all drains are kept free of materials that could cause blockages in storm water release.

2.3 Monitoring

Depot HSEQ inspections and audits will identify areas of concern during wet season rainfalls. Hydrocarbon spills are cleaned up and any contaminated soils are either treated or removed off site.

3. Waste Management

3.1 Identified Risks

The following risks have been identified at the site, for waste management.

- a) Freight packaging materials that dislodge and litter the depot areas and can be blown or washed off-site into nearby waterways.
- b) Disused equipment left on site that affects the aesthetic outlook of the depot.
- c) Scrap material left in the depots from servicing / repair tasks that if not controlled may breakdown into the soils or be washed off site by storm waters.

3.2 Waste Management Aim

The aim of the waste management process adopted by Sea Swift is to:

- a) Maintain an aesthetic appeal of the depot area and habitat of the surrounding environment by ensuring that no wastes are disposed on or adjacent to the site.
- b) Prevent the mixing of waste streams.

- c) Identify and correctly dispose of those waste products identified as “Regulated Wastes” under schedule 7 of the Environmental Protection Regulation 2008.
- d) Implement waste tracking procedures for those products identified as “Trackable Waste” under schedule 1 of the Environmental Protection (Waste Management) Regulation 2000.

3.3 Control Strategies

Waste products will be collected and disposed of as follows.

Waste Product	Regulated	Disposal Method
Waste Oil	Yes	No waste oil is held at the Weipa depot, all equipment servicing is carried out off site.
Soils contaminated by hydrocarbons Used Absorbent Material	Yes	Spills affecting small volumes with absorbent material. The contaminated soil and the absorbent material will be stored in labelled containers containing not more than 100kg of material for a minimum of 28 days. It will then be disposed of at the local council landfill dump. NOTE: Providing the maximum lot is not exceeded, absorbent material breaks oil down to a form where it is not considered “Regulated” under EP Act, in approximately 28 days.
Lead Acid Batteries	Yes	Deposited in the recycling section of the local council landfill sites.
Sanitary Waste	No	Sanitary waste will be collected in containers and disposed of at approved waste site.
Scrap Wood	No	Scrap wooden packaging will be reused where possible, otherwise it will be segregated and disposed of at the local council waste disposal facility.
Non-recyclable solid waste	No	Stored at the site for removal and disposal at the local waste site.
Waste office paper	No	All waste office paper generated will be collected and recycled where possible.

4. Air Quality (Dust)

4.1 Identified Risks

The following risk has been identified at the site, for air quality.

- b) There is potential for ground dust to be generated at the Weipa Depot, during hot dry periods and increased vehicle traffic movement in the yard.

4.2 Controls Implemented

The following controls related to the risk as detailed above have been implemented at the site.

- b) Traffic speed is limited at the depot; limited traffic movement around maintenance and office sites; water down main traffic areas.

4.3 Monitoring

The depot Manager shall monitor all air quality at the yard and adopt the above control measures where dust is affecting work areas, customers or neighbouring properties.

5. Noise

5.1 Identified Risks

The following risk has been identified at the site, for noise.

- a) Noise from machinery operations within the site impacts on employees or the nearest neighbouring properties.

5.2 Controls Implemented

- a) Mobile equipment noise is reduced by maintaining vehicles to the required Queensland traffic standards; forklift and truck use in the yard is intermittent.
- b) The depot is located some distance away from neighbouring businesses and residential areas.

5.3 Monitoring

Noise levels are monitored at the site, through HSEQ inspections and Supervisors / Managers observations during work hours. The forklift and loading activities are carried out away from the main customer area of the office.

6. Hazardous Substances

6.1 Identified Risks

The following risk has been identified at the site, for hazardous and/or dangerous goods that may be held or used at the depot.

- a) Minor hazardous substance freight that is received and held at the depot may leak or be damaged in transit, and spill onto the floor or depot yard. Residue if not managed properly may be washed into the drains causing harm to the coastal waterways and the ecosystem.
- b) Minor hazardous liquids or solids used at the depot that is not disposed of in accordance with its Safety Data Sheet, and if disposed of in drains, causing harm to coastal waterways the ecosystem.

6.2 Controls Implemented

- a) Employees responsible for handling the depot or customer's minor hazardous goods participate in awareness training.
- b) Identified minor spills are quarantined away from other freight. Clean up carried out in accordance with the substance Safety Data Sheet.
- c) The chemical management program 'Chemwatch' is available in all depots to assist employees with instructions on the safe disposal of substances.

6.3 Monitoring

Depot Manager / Supervisor conduct scheduled inspections of the depot, and report on hazardous substance / dangerous goods non-conformances. Employees participate in toolbox talks and other information / training sessions for the safe handling of hazardous and dangerous goods.

7. Reducing the Carbon Footprint

7.1 Identified Opportunities

The following opportunities has been identified at the depot, for positively participating in reducing the company's carbon footprint.

- a) Reducing the use of paper and printed material.
- b) Recycling / reusing materials for freight management and engineering maintenance at the depot.
- c) Reduce the essential resource usage (fuels, electricity and water).

7.2 Controls Implemented

- a) Employees at the depots are encouraged to reduce the amount of printed materials by using the email system to pass on information that would have been printed; print double sided where possible to reduce paper usage; control printing outputs to only printing what is necessary.
- b) Employees are encouraged to recycle non-confidential printed paper for their notetaking. Confidential documents are shredded and recycled.
- c) Freight packaging material is reused where possible; wooden pallets are repaired and returned for use.
- d) Fuel burning company equipment is regularly maintained so as to ensure the efficient use of fuels.
- e) Employees are encouraged to turn off electrical items when not in use; lights and air-conditioners in rooms are turned off after their use or if not needed.
- f) The reduction of water usage for cleaning purposes is encouraged at the depot.

7.3 Monitoring

Each department is challenged to assist in reducing the company's carbon footprint.

Darwin Frances Bay Depot



1. Hydrocarbon Management

1.1 Identified Risks

The following risks have been identified at the site, for the storage, handling and transfers of flammable and combustible liquids.

- a) Fire causing the uncontrolled release onto the ground and/or waterways of hydrocarbons.
- b) Failure in the fixed or portable piping and hoses used to transfer fuels into tanks, machinery, causing release of hydrocarbons to the ground and/or waterways.
- c) Failure of dangerous goods storage tank, bunds or containers causing release of hydrocarbons to the ground and/or waterways.
- d) Deterioration of fuel tanks, bunding or spill containment controls causing release of hydrocarbons to the ground and/or waterways.
- e) Breakdown or failure of hydrocarbon pumping equipment releasing product onto the ground or in waterways.

1.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Firefighting equipment including fire extinguishers installed and maintained on site; regular fire and evacuation drills carried out on site; contracted fire equipment maintenance carried in accordance with the relevant Australian Standard; employees are trained and tested on fire and evacuation skills, spill kits on site.
- b) Fixed and portable piping and hoses are tested and certified by Perrotts Engineering; continuing inspection and maintenance program on all hoses and pipes at the depot that show current test tags; engineering repair and maintenance crew on site to administer the maintenance program, spill kits on site.
- c) Periodic audit and inspection of tanks, facility and installations by approved contractors and/or specialist providers; site inspection conducted monthly using IMS-FRM-011.07 Darwin Frances Bay Depot Environmental Inspection Checklist and integrity checks, portable bund protection for larger storage pods /facility, spill kits on site.
- d) Maintenance program for all site equipment by internal and external specialist contracting providers; site inspections, spill kits on site.

1.3 Monitoring

Darwin Frances Bay Depot staff are to adhere and respond to all HSEQ inspections, audits and their corrective actions.

The NT Operations Manager has the overall responsibility to ensure that the requirements of regulative licence and permits at the Darwin Frances Bay Depot are in place and adhered to at all times. Internal / external audit corrective actions shall be monitored through to completion.

1.4 Emergency Response

Any uncontrolled release of hydrocarbons shall be immediately reported to the Emergency Warden and Depot Manager, and the following actions undertaken:

- Attempt to stop the leak at the source (shut down pumping equipment, close valves or isolate piping).
- Report the spill to the Depot Manager / Emergency Warden as soon as practicable, while deploying spill kits and booms. (Refer to IMS-SWI-015.6 Darwin Emergency Response Plan).
- Depot Manager / Emergency Warden to notify external agencies if applicable (as per IMS-SWI-015.6 Darwin Emergency Response Plan).
- Manage spill onsite and commence clean up after the spill is controlled. Contaminated soil and clean up materials are to be removed off site and disposed of by specialist licenced contractor in accordance with local waste regulatory requirements.
- Complete incident investigation and reporting after the scene is controlled as per IMS-SOP-014 Incident and Non-Conformance Management.

2. Stormwater Management

2.1 Identified Risks

The following risks have been identified at the site, for stormwater management.

- a) Stormwater inundates the depot area and washes loose surface material/debris off site into nearby waterways.
- b) Heavy storms degrade depot waterway banks and moves loose material into the nearby waters.

2.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Depot exterior surfaces are regularly inspected by staff and loose waste and other material are recovered and placed in waste bins or

stacked correctly to avoid being shifted in periods of heavy rain or wind.

- b) Drainage system that is implemented onsite to control surface water off site. All drains grates and traps kept clear of debris.

2.3 Monitoring

HSEQ inspections and audits will identify areas of concern during wet season rainfalls. Fuel farm bunded area are serviced regularly and tested against heavy rainfall.

2.4 Emergency Response

In the case of severe flooding at the site, the Sea Swift Corporate Emergency Response and Recovery Plan will be initiated, and immediate preventative and corrective actions implemented to prevent pollutants, waste material and other debris from being inundated by water washed off site. A pre-cyclone checklist has been developed for the site that includes preparation for tidal surges.

Should heavy rain inundation threaten the site, the following should occur.

- Fuel / oil storage tanks are to be checked for their integrity and stability during high waters.
- Unstable fuel / oil containers (e.g. IBC's, drums) are to be either drained into larger more stable tanks or removed off site to higher ground or another site.
- The site is to be cleaned of loose containers and other material that could have the potential of being shifted and/or pollute the surrounding area.
- Department Manager to ensure all preparation checks are completed and remain in contact with the General Manager.

3. Waste Management

3.1 Identified Risks

The following risks have been identified at the site, for waste management.

- a) Solid and liquid waste may detract from the amenity of the area and have the potential to contaminate land and waterways.
- b) Some waste products generated during servicing and maintenance activities have the potential to be classified as "Listed Waste" under NT EPA act and regulations and therefore must be stored and disposed of in an appropriate manner.
- c) Darwin Frances Bay Depot receives, prepares and may store (on a short-term basis) prescribed waste classified as "Listed Waste" under

NT EPA act and regulations. Any listed waste must be received, transported and stored as per legislation with current licences in place.

3.2 Waste Management Aim

The aim of the waste management process adopted by Sea Swift is to:

- a) Maintain an aesthetic appeal of the depot area and habitat of the surrounding environment by ensuring that no wastes are disposed on or adjacent to the site.
- b) Prevent the mixing of waste streams.
- c) Identify and correctly handle and manage prescribed waste products identified as “Listed Waste” under NT EPA act and regulations.

3.3 Control Strategies

Waste products will be managed (collected, transported, stored, disposed as relevant) as follows.

Waste Product	Regulated	Method – Collection, Transport, Storage, Disposal as relevant
Asbestos / Asbestos containing material	Yes	Asbestos waste is packaged by licensed contractors in remote ports in accordance with statutory requirements and shipped to Darwin where licensed third party collects the product and removes it from site.
Clinical and related wastes	Yes	Used syringes are packaged in accordance with statutory requirements and placed in sealed containers by the consignee and shipped to Darwin where they stored in a locked container until they are collected by an authorised licensed third party
Waste mixtures or waste emulsions - Waste Oil, Oily Water, hydrocarbon & water	Yes	Collected in waste oil drums and taken from the vessels / workshop and decanted into bulk bunded storage container and collected by a licensed regulated waste contractor.
Waste pharmaceuticals, waste drugs / medicines	Yes	Medical waste is packaged in accordance with in accordance with statutory requirements and placed in sealed containers by the consignee and shipped to Darwin where they are stored in a locked container until they are collected by an authorised licensed third party
Used Oil Filters	Yes	Stored in a designated receptacle at the Darwin Depot where it will be collected by a licensed regulated waste disposal contractor. NOTE: Oil is removed from the filter prior to collection in

Waste Product	Regulated	Method – Collection, Transport, Storage, Disposal as relevant
		the used oil filter bin.
Oily Rags and Used Absorbent Material	Yes	Stored in designated receptacles at Darwin Depot where it will be collected by a licensed regulated waste disposal contractor.
Soils contaminated by hydrocarbons	Yes	Spills affecting small volumes with absorbent material. The contaminated soil and the absorbent material are stored in designated and labelled containers. Receptacles are collected by a licensed regulated waste disposal contractor who disposes in accordance with statutory and local requirements.
Lead Acid Batteries	Yes	Collected in a designated waste battery container for collection by a licensed regulated waste contractor in Darwin.
Sewage	Yes	Sewage will be confined in vessel sullage tanks will be pumped out by licensed regulated waste disposal contractors as required. Sewage at the site is a septic waste system and waste tanks under ablution blocks which is pumped out by licensed contractors
Sanitary Waste	No	Sanitary waste will be collected in containers and disposed of at approved waste site.
Empty Drums and other containers.	No	They will be reused for oily waste collection and removal, and the product will be removed, and the drums crushed and transported off site for recycling.
Scrap Metal	No	Scrap metals are separated and stored at the site for reuse or collection by recycling contractors.
Scrap Wood	No	Scrap wooden packaging will be reused where possible, otherwise it will be placed in the general rubbish.
Non-recyclable solid waste	No	Stored at the site for removal and disposal at the local waste site.
Waste office paper	No	All waste office paper generated will be collected and recycled where possible. This includes confidential waste destruction by approved contractor.

4. Air Quality (Dust)

4.1 Identified Risks

The following risk has been identified at the site, for air quality.

- a) There is potential for ground dust to be generated at the site, during hot dry periods and increased vehicle traffic movement in the yard.
- b) Tug and barge activity at the landing may be required to load soils, gravel or other loose bulk material for outer islands that may generate dust whilst loading.

4.2 Controls Implemented

The following controls related to the risk as detailed above have been implemented at the site.

- a) Traffic speed limits are in place at the site, limited traffic movement around maintenance and office sites.
- b) Loose solid material spills or build up is cleaned up regularly and removed off site.
- c) Where dust generating material is being loaded onto tug and barge, the dust will be suppressed by water sprays or wetting the material before unloading takes place.

4.3 Monitoring

The Department Managers shall monitor all air quality at the depot, and ensure speed limits and dust is controlled, and their operational areas are kept clean.

5. Noise

5.1 Identified Risks

The following risk has been identified at the site, for noise.

- a) Noise from maintenance activities at the workshop impacts on nearby employees in the yard or the nearest neighbouring properties.
- b) Noise from machinery operations within the site impacts on employees or the nearest neighbouring properties.

5.2 Controls Implemented

- a) Noise emitting equipment used in the workshop is either located away from main work areas or used for short periods of time; noise levels reduced due to the distance of workshop to the yard employee's work

areas; noise levels are reduced to neighbouring properties due to equipment confinement in workshop and distance.

- b) Mobile equipment noise is reduced by maintaining vehicles to the required standards, equipment traffic in the yard minimised by work area locations and vehicle usage.

5.3 Monitoring

Noise levels are monitored at the site, through HSEQ inspections and Supervisors / Managers observations during work hours. Equipment used on the site is maintained by the resident mechanics.

6. Hazardous / Dangerous Goods

6.1 Identified Risks

The following risk has been identified at the site, for hazardous and/or dangerous goods that may be held or used at the depot.

- a) Hazardous or dangerous goods freight that is received and held at the depot before being loaded onto another vessel or delivered to the customer may leak or be damaged in transit, and spill into the drains causing harm to the coastal waterways and the ecosystem.
- b) Minor hazardous liquids or solids used at the depot that is not disposed of in accordance with its Safety Data Sheet, and if disposed of in drains, causing harm to coastal waterways the ecosystem.

6.2 Controls Implemented

- a) Employees responsible for handling customer hazardous / dangerous goods attend approved awareness training
- b) A bunded quarantine area is located in the yard area, where leaking or unfit hazardous substance containers can be moved to and stored until their removal off site.
- c) The chemical management program 'ChemWatch' is available in all depots to assist employees with instructions on the safe disposal of substances.

6.3 Monitoring

Depot Manager / Supervisor conduct scheduled inspections of the depot, and report on hazardous substance / dangerous goods non-conformances. Employees participate in toolbox talks and other information / training sessions for the safe handling of hazardous and dangerous goods.

7. Reducing the Carbon Footprint

7.1 Identified Opportunities

The following opportunities has been identified at the depot, for positively participating in reducing the company's carbon footprint.

- a) Reducing the use of paper and printed material.
- b) Recycling / reusing materials for freight management and engineering maintenance at the depot.
- c) Reduce the essential resource usage (fuels, electricity and water).

7.2 Controls Implemented

- a) Employees at the depot are encouraged to reduce the amount of printed materials by using the email system to pass on information that would have been printed; print double sided where possible to reduce paper usage; control printing outputs to only printing what is necessary.
- b) Employees are encouraged to recycle non-confidential printed paper for their notetaking. Confidential documents are shredded and recycled.
- c) Freight packaging material is reused where possible; wooden pallets are repaired and returned for use.
- d) The engineering section at the depot recycle / reuse equipment parts and metals to assist in reducing the maintenance costs. Oil and other product drums are reused where possible.
- e) Fuel burning company equipment is regularly maintained so as to ensure the efficient use of fuels.
- f) Employees are encouraged to turn off electrical items when not in use; lights and air-conditioners in rooms are turned off after their use or if not needed.
- g) The reduction of water usage for cleaning purposes is encouraged at the depot.

7.3 Monitoring

Each department is challenged to assist in reducing the company's carbon footprint.

8. Vermin including Cane Toad Management

Sea Swift operational and marine crews shall ensure all containerised and loose freight that is prepared for loading on vessels destined for protected areas such as Groote Eylandt are free from environmental hazards including unwanted vermin and pests including cane toads that may cause harm or infestation at the client's site.

A number of controls and process are in place and maintained specific to cane toad management as outlined in detail in IMS-SWI-011.1 and related procedures.

The Depot has a number of controls in place specific to vermin and pest control, monitored via specialist contractors and routine inspections.

9. Weed and Quarantine Management

Sea Swift is committed to preventing the introduction of invasive species that post a significant risk to the ecology of protected areas and sites such as Groote Eylandt. Darwin Frances Bay Depot has a number of controls in place, to ensure freight, vehicles and other equipment travelling to protected areas is free from contaminants (e.g. soil, weeds, seeds or other unwanted vegetation) that present a significant quarantine risk.

Controls include regular inspections; wash down activities (identified contaminated equipment, containers, vehicles, mobile plant); reporting and management of identified risks in accordance with Groote Eylandt and any other client contract quarantine requirements.

10. Conclusion

The Depot Manager in conjunction with the Operations Manager, NT shall ensure that all environmental risks at the site are managed in accordance with this plan and to a level as low as reasonably practicable. Higher risks that require capital expenditure shall be included on Operations Department Risk Register, and plans put in place to address those risks.

GOVE DEPOT



1. Hydrocarbon Management

1.1 Identified Risks

The following risks have been identified at the site, for the storage, handling and transfers of flammable and combustible liquids.

- a) Fire / Explosion causing the uncontrolled release onto the ground and/or waterways of hydrocarbons.
- b) Failure in the fixed or portable piping and hoses used to transfer fuels into tanks, machinery, causing release of hydrocarbons to the ground and/or waterways.
- c) Failure of dangerous goods storage tank, bunds or containers causing release of hydrocarbons to the ground and/or waterways.
- d) Deterioration of tank farm bunding or spill containment controls causing release of hydrocarbons to the ground and/or waterways.
- e) Breakdown or failure of hydrocarbon pumping equipment releasing product onto the ground or in waterways.

1.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Firefighting equipment including fire extinguishers installed and maintained on site; regular fire and evacuation drills carried out on site; contracted fire equipment maintenance carried in accordance with the relevant Australian Standard; employees are trained and tested on fire and evacuation skills, spill kits on site.
- b) Fixed and portable piping and hoses are tested and certified by Fire Protection Professional International Pty Ltd; scheduled maintenance program and activities on all hoses and pipes at the depot that show current test tags; engineering repair and maintenance crew on site to administer the maintenance program, spill kits on site.
- c) Periodic audit and inspection of tanks and installations by approved representatives; site inspections and integrity checks, portable and self-bund protection for larger storage pods /facility, spill kits on site.
- d) Maintenance program for all site equipment by internal and external specialist contracting providers; site inspections, spill kits on site.

1.3 Monitoring

Gove Depot staff are to adhere and respond to all HSEQ inspections, audits and their corrective actions. The NT Operations Manager has the overall responsibility to ensure that the requirements of regulative licence and permits at the Gove Depot are in place and adhered to at all times. Internal / external audit corrective actions shall be monitored through to completion.

1.4 Emergency Response

Any uncontrolled release of hydrocarbons shall be immediately reported to the Gove Depot Emergency Warden and Depot Manager, and the following actions undertaken:

- Attempt to stop the leak at the source (shut down pumping equipment, close valves or isolate piping).
- Report the spill to the Depot Manager as soon as practicable, while deploying spill kits and booms. (Refer to IMS-SWI-015.9 Gove Depot Emergency Response Plan).
- Depot Manager to notify external agencies if applicable (as per IMS-SWI-015.9 Gove Depot Emergency Response Plan).
- Manage spill onsite and commence clean up after the spill is controlled. Contaminated soil is to be removed off site by specialist contractor and on approval of NT Environmental Protection Authority (EPA).
- Complete incident investigation and after completion, the Operations Manager shall distribute the incident report and learnings to internal / external personnel.

2. Stormwater Management

2.1 Identified Risks

The following risks have been identified at the site, for stormwater management.

- a) Stormwater inundates the fuel farm bund area and deposits oily water around the fuel farm and/or off site.
- b) Heavy rains wash soils from yard and workshop areas off site into water ways.

2.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Self bunded portable fuel pod (6000L) in use at the Depot with portable spill containment material readily at hand. Fuel pod is located away from stormwater drains or inlets to minimise the risk of hydrocarbons entering waterways in the event of any spill.
- b) Drainage system implemented onsite to control surface water; yard soil is porous and can soak in surface water.

2.3 Monitoring

Depot HSEQ inspections and audits will identify areas of concern during wet season rainfalls. Oil separators connected to the fuel farm bunded area are serviced regularly and tested against heavy rainfall.

2.4 Emergency Response

In the case of severe flooding at the site, the Sea Swift Corporate Emergency Response and Recovery Plan will be initiated, and immediate preventative and corrective actions implemented to prevent pollutants from being inundated by water washed off site. A pre-cyclone checklist has been developed for the site that includes preparation for tidal surges.

Should heavy rain inundation threaten the site, the following should occur.

- Fuel / oil storage tanks are to be checked for their integrity and stability during high waters.
- Unstable fuel / oil containers (e.g. IBC's) are to be either drained into larger more stable tanks or removed off site to higher ground or another site.
- The site cleaned of loose containers and other material that could have the potential of being shifted or pollute the surrounding area.
- Depot Manager to complete all preparation checks and remain in contact with the Department Manager.

3. Waste Management

3.1 Identified Risks

The following risks have been identified at the site, for waste management.

- a) Solid and liquid waste may detract from the amenity of the area and have the potential to contaminate land and waterways.
- b) Some waste products generated during servicing and maintenance activities have the potential to be classified as "Listed Waste" under NT EPA act and regulations and therefore must be stored and disposed of in an appropriate manner.
- c) Gove Depot receives, prepares and may store (on a short-term basis) prescribed waste classified as "Listed Waste" under NT EPA act and regulations. Any listed waste must be received, transported and stored as per legislation with current licences in place.

3.2 Waste Management Aim

The aim of the waste management process adopted by Sea Swift is to:

- a) Maintain an aesthetic appeal of the depot area and habitat of the surrounding environment by ensuring that no wastes are disposed on or adjacent to the site.
- b) Prevent the mixing of waste streams.
- c) Identify and correctly handle and manage prescribed waste products identified as “Listed Waste” under NT EPA act and regulations.

3.3 Control Strategies

Waste products will be managed (collected, transported, stored, disposed as relevant) as follows.

Waste Product	Regulated	Method – Collection, Transport, Storage, Disposal as relevant
Asbestos / Asbestos containing material	Yes	Asbestos waste is packaged by licensed contractors in a secured site in accordance with statutory requirements and transported to Gove depot within a secured container or transportable device that meets the safety standards required for shipment to Darwin and all relevant paper work i.e. SDS. Then licensed third party collects the product and removes it from site.
Clinical and related wastes	Yes	Used syringes are packaged in accordance with statutory requirements and placed in sealed/Padlocked containers (Wheelie Bins) by the consignee and shipped to Darwin where they stored in a locked container until they are collected by an authorised licensed third party
Waste mixtures or waste emulsions - Waste Oil, Oily Water, hydrocarbon & water	Yes	Collected in waste oil drums and taken from the vessels / workshop and decanted into bulk bunded storage container where it will be returned to Darwin and collected by a licensed regulated waste contractor.
Waste pharmaceuticals, wast drugs / medicines	Yes	Medical waste is packaged in accordance with in accordance with statutory requirements and placed in sealed containers by the consignee and shipped to Darwin where they are stored in a locked container until they are collected by an authorised licensed third party
Used Oil Filters	Yes	Collected in drums at the site and returned to Darwin where it will be collected by a licensed regulated waste disposal contractor. NOTE: Oil is removed from the filter prior to collection in the used oil filter bin.
Oily Rags and Used Absorbent	Yes	Stored in bins at the site and returned to Darwin where it will be collected by a licensed regulated waste disposal

Waste Product	Regulated	Method – Collection, Transport, Storage, Disposal as relevant
Material		contractor.
Soils contaminated by hydrocarbons	Yes	Spills affecting small volumes with absorbent material. The contaminated soil and the absorbent material will be stored in labelled containers containing not more than 100kg of material for a minimum of 28 days. It will then be disposed of at the local council landfill dump. NOTE: Providing the maximum lot is not exceeded, absorbent material breaks oil down to a form where it is not considered “Regulated” under EP Act, in approximately 28 days.
Lead Acid Batteries	Yes	Collected in a designated waste battery container for collection by a licensed regulated waste contractor in Gove
Sewage	Yes	Sewage will be confined in vessel sullage tanks will be pumped out by licensed regulated waste disposal contractors as required. Sewage at the site is managed through council approved waste system.
Sanitary Waste	No	Sanitary waste will be collected in containers and disposed of at approved waste site.
Empty Drums and other containers.	No	They will be reused for oily waste collection and removal and returned to Darwin where the product will be removed, and the drums crushed and transported off site for recycling.
Scrap Metal	No	Scrap metals are separated and stored at the site for reuse or collection by recycling contractors.
Scrap Wood	No	Scrap wooden packaging will be reused where possible, otherwise it will be segregated and disposed of at the local council waste disposal facility.
Non-recyclable solid waste	No	Stored at the site for removal and disposal at the local waste site.
Waste office paper	No	All waste office paper generated will be collected and recycled where possible.

4. Air Quality (Dust)

4.1 Identified Risks

The following risk has been identified at the site, for air quality.

- a) There is potential for ground dust to be generated at the site, during hot dry periods and increased vehicle traffic movement in the yard.

4.2 Controls Implemented

The following controls related to the risk as detailed above have been implemented at the site.

- a) Use of water truck to water down main traffic areas.
- b) Traffic speed limits are in place at the site, limited traffic movement around maintenance and office sites.

4.3 Monitoring

The depot Manager shall monitor all air quality at the yard and adopt the above control measures where dust is affecting work areas, customers or neighbouring properties.

5. Noise

5.1 Identified Risks

The following risk has been identified at the site, for noise.

- a) Noise from maintenance activities at the workshop impacts on nearby employees in the yard or the nearest neighbouring properties.
- b) Noise from machinery operations within the site impacts on employees or the nearest neighbouring properties.

5.2 Controls Implemented

- a) Noise emitting equipment used in the workshop is either located away from main work areas or used for short periods of time; noise levels reduced due to the distance of workshop to the yard employee's work areas; noise levels are reduced to neighbouring properties due to equipment confinement in workshop and distance.
- b) Mobile equipment noise is reduced by maintaining vehicles to the required standards, equipment traffic in the yard minimised by work area locations and vehicle usage.

5.3 Monitoring

- a) Noise levels are monitored at the site, through HSEQ inspections and Supervisors / Managers observations during work hours. Equipment used on the site is maintained by the resident mechanics.

6. Hazardous / Dangerous Goods

6.1 Identified Risks

The following risk has been identified at the site, for hazardous and/or dangerous goods that may be held or used at the depot.

- a) Hazardous or dangerous goods freight that is received and held at the depot before being loaded onto another vessel or delivered to the customer may leak or be damaged in transit, and spill into the drains causing harm to the coastal waterways and the ecosystem.
- b) Minor hazardous liquids or solids used at the depot that is not disposed of in accordance with its Safety Data Sheet, and if disposed of in drains, causing harm to coastal waterways the ecosystem.

6.2 Controls Implemented

- a) Employees responsible for handling customer hazardous / dangerous goods attend awareness training
- b) A quarantine area is available in the yard area, where leaking or unfit hazardous substance containers can be moved to and stored until their removal off site.
- c) Dedicated DG and hazardous chemicals storage area within the Freight Shed.
- d) The chemical management program 'ChemWatch' is available in all depots to assist employees with instructions on the safe disposal of substances.

6.3 Monitoring

Depot Manager / Supervisor conduct scheduled inspections of the depot, and report on hazardous substance / dangerous goods non-conformances. Employees participate in toolbox talks and other information / training sessions for the safe handling of hazardous and dangerous goods.

7. Reducing the Carbon Footprint

7.1 Identified Opportunities

The following opportunities has been identified at the depot, for positively participating in reducing the company's carbon footprint.

- a) Reducing the use of paper and printed material.
- b) Recycling / reusing materials for freight management and engineering maintenance at the depot.
- c) Reduce the essential resource usage (fuels, electricity and water).

7.2 Controls Implemented

- a) Employees at the depot are encouraged to reduce the amount of printed materials by using the email system to pass on information that would have been printed; print double sided where possible to reduce paper usage; control printing outputs to only printing what is necessary.
- b) Employees are encouraged to recycle non-confidential printed paper for their notetaking. Confidential documents are shredded and recycled.
- c) Freight packaging material is reused where possible; wooden pallets are repaired and returned for use.
- d) The engineering section at the depot recycle / reuse equipment parts and metals to assist in reducing the maintenance costs. Oil and other product drums are reused where possible.
- e) Fuel burning company equipment is regularly maintained so as to ensure the efficient use of fuels.
- f) Employees are encouraged to turn off electrical items when not in use; lights and air-conditioners in rooms are turned off after their use or if not needed.
- g) The reduction of water usage for cleaning purposes is encouraged at the depot.

7.3 Monitoring

Each department is challenged to assist in reducing the company's carbon footprint.

8. Vermin including Cane Toad Management

Sea Swift operational and marine crews shall ensure all containerised and loose freight that is prepared for loading on vessels destined for protected areas such as Groote Eylandt are free from environmental hazards including unwanted vermin and pests including cane toads that may cause harm or infestation at the client's site.

A number of controls and process are in place and maintained specific to cane toad management as outlined in detail in IMS-SWI-011.1 and related procedures.

The Depot has a number of controls in place specific to vermin and pest control, monitored via specialist contractors and routine inspections.

9. Weed and Quarantine Management

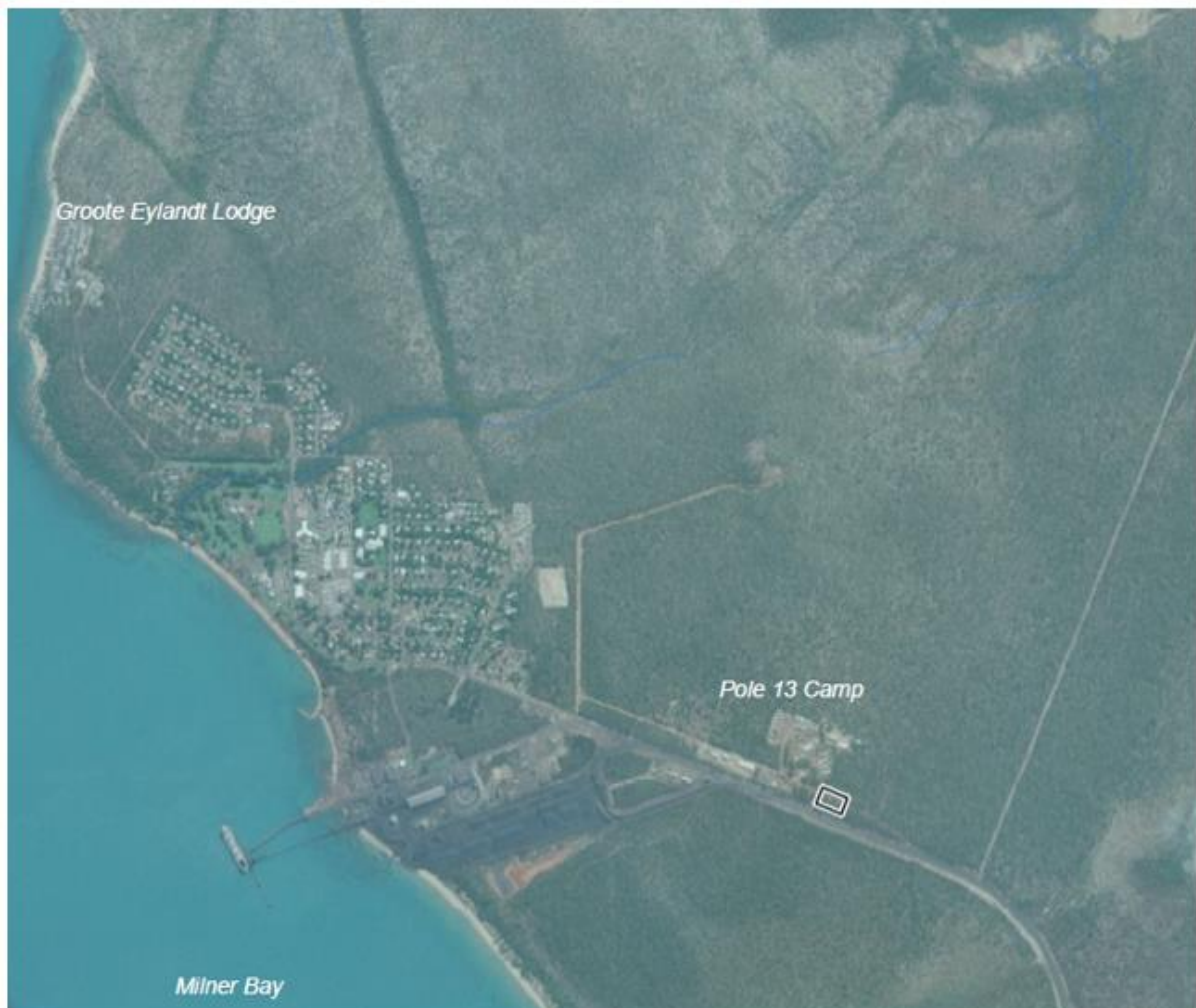
Sea Swift is committed to preventing the introduction of invasive species that post a significant risk to the ecology of protected areas and sites such as Groote Eylandt. Gove Depot have a number of controls to ensure freight, vehicles and other equipment travelling to protected areas is free from contaminants (e.g. soil, weeds, seeds or other unwanted vegetation) that present a significant quarantine risk.

Controls include regular inspections; wash down activities (identified contaminated equipment, containers, vehicles, mobile plant); reporting and management of identified risks in accordance with Groote Eylandt and any other client contract quarantine requirements.

10. Conclusion

The Gove Depot Manager in conjunction with the Operations Manager, NT shall ensure that all environmental risks at the site are managed in accordance with this plan and to a level as low as reasonably practicable. Higher risks that require capital expenditure shall be included on Operations Department Risk Register, and plans put in place to address those risks.

GROOTE EYLANDT DEPOT



1. Hydrocarbon Management

1.1 Identified Risks

The following risks have been identified at the site, for the storage, handling and transfers of flammable and combustible liquids.

- a) Fire / Explosion causing the uncontrolled release onto the ground and/or waterways of hydrocarbons.
- b) Failure of dangerous goods storage tank, bunds or containers causing release of hydrocarbons to the ground and/or waterways.
- c) Deterioration of fuel tanks, bunding or spill containment controls causing release of hydrocarbons to the ground and/or waterways.
- d) Breakdown or failure of hydrocarbon pumping equipment releasing product onto the ground or in waterways.

1.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Firefighting equipment including fire extinguishers installed and maintained on site; regular fire and evacuation drills carried out on site; contracted fire equipment maintenance carried in accordance with the relevant Australian Standard; employees are trained and tested on fire and evacuation skills, spill kits on site.
- b) Fixed and portable piping and hoses are tested and certified; continuing inspection and maintenance program on all hoses at the depot that show current test tags; engineering repair and maintenance crew on site to administer the maintenance program, spill kits on site.
- c) Periodic audit and inspection of facility and installations by approved contractors and/or specialist providers; site inspections and integrity checks, portable bund protection for larger storage pods /facility, spill kits on site.
- d) Maintenance program for all site equipment by internal and external specialist contracting providers; site inspections, spill kits on site.

1.3 Monitoring

Groote Eylandt Depot staff are to adhere and respond to all HSEQ inspections, audits and their corrective actions.

The NT Operations Manager has the overall responsibility to ensure that the requirements of regulative licence and permits at the Groote Eylandt Depot are in place and adhered to at all times. Internal / external audit corrective actions shall be monitored through to completion.

1.4 Emergency Response

Any uncontrolled release of hydrocarbons shall be immediately reported to the Groote Eylandt Depot Emergency Warden and Depot Manager, and the following actions undertaken:

- Attempt to stop the leak at the source.
- Report the spill to the Depot Manager as soon as practicable, while deploying spill kits and booms. (Refer to IMS-SWI-015.10 Groote Eylandt Depot Emergency Response Plan).
- Depot Manager to notify external agencies if applicable (as per IMS-SWI-015.10 Groote Eylandt Depot Emergency Response Plan).
- Manage spill onsite and commence clean up after the spill is controlled. Contaminated soil is to be removed off site and disposed of by specialist licenced contractor in accordance with local waste regulatory requirements.
- Complete incident investigation and reporting after the scene is controlled as per IMS-SOP-014 Incident and Non-Conformance Management.

2. Stormwater Management

2.1 Identified Risks

The following risks have been identified at the site, for stormwater management.

- a) Heavy rains wash soils from yard and workshop areas off site into water ways.

2.2 Controls Implemented

The following controls related to the risks as detailed above have been implemented at the site.

- a) Drainage system implemented onsite to control surface water; yard soil is porous and can soak in surface water.

2.3 Monitoring

Depot HSEQ inspections and audits will identify areas of concern during wet season rainfalls.

2.4 Emergency Response

In the case of severe flooding at the site, the Sea Swift Corporate Emergency Response and Recovery Plan will be initiated, and immediate preventative and corrective actions implemented to prevent pollutants from being inundated by water washed off site. A pre-cyclone checklist has been developed for the site that includes preparation for tidal surges.

Should heavy rain inundation threaten the site, the following should occur.

- Unstable fuel / oil containers (e.g. IBC's) are to be either drained into larger more stable tanks or removed off site to higher ground or another site.
- The site cleaned of loose containers and other material that could have the potential of being shifted or pollute the surrounding area.
- Depot Manager to complete all preparation checks and remain in contact with the Department Manager.

3. Waste Management

3.1 Identified Risks

The following risks have been identified at the site, for waste management.

- a) Solid and liquid waste may detract from the amenity of the area and have the potential to contaminate land and waterways.
- b) Some waste products generated during servicing and maintenance activities have the potential to be classified as "Listed Waste" under NT EPA act and regulations and therefore must be stored and disposed of in an appropriate manner.
- c) Groote Eylandt Depot receives, prepares and may store (on a short-term basis) prescribed waste classified as "Listed Waste" under NT EPA act and regulations. Any listed waste must be received, transported and stored as per legislation with current licences in place.

3.2 Waste Management Aim

The aim of the waste management process adopted by Sea Swift is to:

- a) Maintain an aesthetic appeal of the depot area and habitat of the surrounding environment by ensuring that no wastes are disposed on or adjacent to the site.
- b) Prevent the mixing of waste streams.
- c) Identify and correctly handle and manage prescribed waste products identified as "Listed Waste" under NT EPA act and regulations.

3.3 Control Strategies

Waste products will be managed (collected, transported, stored, disposed as relevant) as follows.

Waste Product	Regulated	Method – Collection, Transport, Storage, Disposal as relevant
Asbestos / Asbestos containing material	Yes	Asbestos waste is packaged by licensed contractors in a secured site in accordance with statutory requirements and transported to Groote Eylandt depot within a secured container or transportable device that meets the safety standards required for shipment to Darwin and all relevant paperwork i.e. SDS. The licensed third party then collects the product from Darwin and removes it from site.
Clinical and related wastes	Yes	Used syringes are packaged in accordance with statutory requirements and placed in sealed/Padlocked containers (Wheelie Bins) by the consignee and shipped to Darwin where they stored in a locked container until they are collected by an authorised licensed third party.
Waste mixtures or waste emulsions - Waste Oil, Oily Water, hydrocarbon & water	Yes	Collected in waste oil drums and taken from the vessels / workshop and decanted into bulk bunded storage container where it will be returned to Darwin and collected by a licensed regulated waste contractor.
Waste pharmaceuticals, waste drugs / medicines	Yes	Medical waste is packaged in accordance in accordance with statutory requirements and placed in sealed containers by the consignee and shipped to Darwin where they are stored in a locked container until they are collected by an authorised licensed third party.
Used Oil Filters	Yes	Collected in drums at the site and returned to Darwin where it will be collected by a licensed regulated waste disposal contractor. NOTE: Oil is removed from the filter prior to collection in the used oil filter bin.
Oily Rags and Used Absorbent Material	Yes	Stored in bins at the site and returned to Darwin where it will be collected by a licensed regulated waste disposal contractor.
Soils contaminated by hydrocarbons	Yes	Spills affecting small volumes with absorbent material. The contaminated soil and the absorbent material will be stored in labelled containers containing not more than 100kg of material for a minimum of 28 days. It will then be disposed of at the local council landfill dump. NOTE: Providing the maximum lot is not exceeded, absorbent material breaks oil down to a form where it is not considered

Waste Product	Regulated	Method – Collection, Transport, Storage, Disposal as relevant
		“Regulated” under EP Act, in approximately 28 days.
Lead Acid Batteries	Yes	Collected in a designated waste battery container for collection by a licensed regulated waste contractor in Groote Eylandt
Sewage	Yes	Sewage will be confined in vessel sullage tanks will be pumped out by licensed regulated waste disposal contractors as required. Sewage at the site is managed through council approved waste system.
Sanitary Waste	No	Sanitary waste will be collected in containers and disposed of at approved waste site.
Empty Drums and other containers.	No	They will be reused for oily waste collection and removal and returned to Darwin where the product will be removed, and the drums crushed and transported off site for recycling.
Scrap Metal	No	Scrap metals are separated and stored at the site for reuse or collection by recycling contractors.
Scrap Wood	No	Scrap wooden packaging will be reused where possible, otherwise it will be segregated and disposed of at the local council waste disposal facility.
Non-recyclable solid waste	No	Stored at the site for removal and disposal at the local waste site.
Waste office paper	No	All waste office paper generated will be collected and recycled where possible.

4. Air Quality (Dust)

4.1 Identified Risks

The following risk has been identified at the site, for air quality.

- a) There is potential for ground dust to be generated at the site, during hot dry periods and increased vehicle traffic movement in the yard.

4.2 Controls Implemented

The following controls related to the risk as detailed above have been implemented at the site.

- a) Use of water truck to water down main traffic areas.
- b) Traffic speed limits are in place at the site, limited traffic movement around maintenance and office sites.

4.3 Monitoring

The Depot Manager shall monitor all air quality at the yard and adopt the above control measures where dust is affecting work areas, customers or neighbouring properties.

5. Noise

5.1 Identified Risks

The following risk has been identified at the site, for noise.

- a) Noise from machinery operations within the site impacts on employees or the nearest neighbouring properties.

5.2 Controls Implemented

- a) Mobile equipment noise is reduced by maintaining vehicles to the required standards, equipment traffic in the yard minimised by work area locations and vehicle usage.

5.3 Monitoring

Noise levels are monitored at the site, through HSEQ inspections and Supervisors / Managers observations during work hours. Equipment used on the site is maintained by the resident mechanics.

6. Hazardous / Dangerous Goods

6.1 Identified Risks

The following risk has been identified at the site, for hazardous and/or dangerous goods that may be held or used at the depot.

- a) Hazardous or dangerous goods freight that is received and held at the depot before being loaded onto another vessel or delivered to the customer may leak or be damaged in transit, and spill into the drains causing harm to the coastal waterways and the ecosystem.
- b) Minor hazardous liquids or solids used at the depot that is not disposed of in accordance with its Safety Data Sheet, and if disposed of in drains, causing harm to coastal waterways the ecosystem.

6.2 Controls Implemented

- a) Employees responsible for handling customer hazardous / dangerous goods attend approved awareness training

- b) Bunded pallets are available for any leaking IBC's and drums, spill equipment available for larger transport units (ISO)
- c) The chemical management program 'ChemWatch' is available in all depots to assist employees with instructions on the safe disposal of substances.

6.3 Monitoring

Depot Manager / Supervisor conduct scheduled inspections of the depot, and report on hazardous substance / dangerous goods non-conformances. Employees participate in toolbox talks and other information / training sessions for the safe handling of hazardous and dangerous goods.

7. Reducing the Carbon Footprint

7.1 Identified Opportunities

The following opportunities has been identified at the depot, for positively participating in reducing the company's carbon footprint.

- a) Reducing the use of paper and printed material.
- b) Recycling / reusing materials for freight management and engineering maintenance at the depot.
- c) Reduce the essential resource usage (fuels, electricity and water).

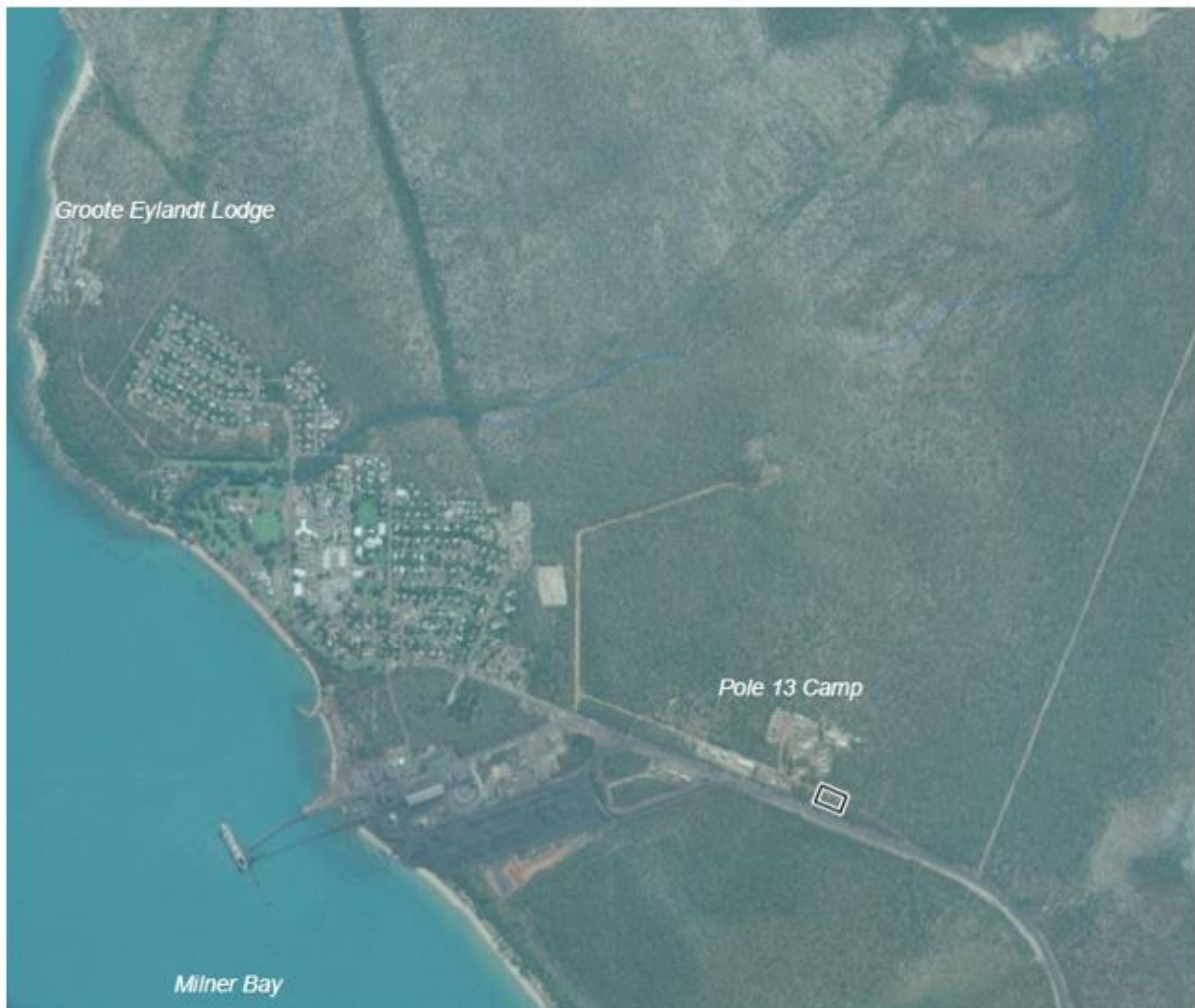
7.2 Controls Implemented

- b) Employees at the depot are encouraged to reduce the amount of printed materials by using the email system to pass on information that would have been printed; print double sided where possible to reduce paper usage; control printing outputs to only printing what is necessary.
- c) Employees are encouraged to recycle non-confidential printed paper for their notetaking. Confidential documents are shredded and recycled.
- d) Freight packaging material is reused where possible; wooden pallets are repaired and returned for use.
- e) The engineering section at the depot recycle / reuse equipment parts and metals to assist in reducing the maintenance costs. Oil and other product drums are reused where possible.
- f) Fuel burning company equipment is regularly maintained so as to ensure the efficient use of fuels.
- g) Employees are encouraged to turn off electrical items when not in use; lights and air-conditioners in rooms are turned off after their use or if not needed.

- h) The reduction of water usage for cleaning purposes is encouraged at the depot.

7.3 Monitoring

Each department is challenged to assist in reducing the company's carbon footprint.



8. Vermin including Cane Toad Management

Sea Swift operational and marine crews shall ensure all containerised and loose freight that is prepared for loading on vessels destined for protected areas such as Groote Eylandt are free from environmental hazards including unwanted vermin and pests including cane toads that may cause harm or infestation at the client's site.

A number of controls and process are in place and maintained specific to cane toad management as outlined in detail in IMS-SWI-011.1 Cane Toad Management and related procedures.

The Depot has a number of controls in place specific to vermin and pest control, monitored via specialist contractors and routine inspections.

9. Weed and Quarantine Management

Sea Swift is committed to preventing the introduction of invasive species that post a significant risk to the ecology of protected areas and sites such as Groote Eylandt. Groote Eylandt Depot have a number of controls to ensure freight, vehicles and other equipment travelling to protected areas is free from contaminants (e.g. soil, weeds, seeds or other unwanted vegetation) that present a significant quarantine risk.

Controls include regular inspections; wash down activities (identified contaminated equipment, containers, vehicles, mobile plant); reporting and management of identified risks in accordance with Groote Eylandt and any other client contract quarantine requirements.

10. Conclusion

The Groote Eylandt Depot Manager in conjunction with the Operations Manager, NT shall ensure that all environmental risks at the site are managed in accordance with this plan and to a level as low as reasonably practicable. Higher risks that require capital expenditure shall be included on Operations Department Risk Register, and plans put in place to address those risks.