

Port of Geraldton Environmental Management Plan

Prepared by: Mid West Ports Authority

2025 - 2030

ENVIRONMENTAL MANAGEMENT PLAN 2025-2030

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Definitions

AACR	Annual Audit Compliance Report
AEP	Annual Environmental Plan
AER	Annual Environmental Report
CAMMS	MWPA enterprise resource planning software for managing Incidents, Hazards, Audits, Inspections, Observations, Risks, Strategy, Compliance and Project Management
Customers	Includes Port Users, Leaseholders, Shipping Agents and Stevedores
Contractor	Individuals contracted by MWPA under a ' <i>contract of employment</i> ' to undertake specific functions and tasks as detailed within a Contract of Employment
DAFF	Commonwealth Department of Agriculture, Fisheries and Forestry
DWER	Western Australian Department of Water and Environmental Regulation
DPIRD	Western Australian Department of Primary Industries and Regional Development
EMP	Environmental Management Plan
FBH	Fishing Boat Harbour
FPOE	First Point of Entry as defined and regulated under the <i>Australian Biosecurity Act 2015</i>
GTE	A Government Trading Enterprise is a publicly (State) owned commercial corporation
Interested Parties	A person or organisation that can affect, be affected by, or perceive itself to be affected by a decision made by MWPA, or an activity undertaken by MWPA
IMS	MWPA Integrated Management System certified to the International Standards: ISO 14001, ISO 45001 and ISO 9001
IMO	The <i>International Maritime Organisation</i> – is the United Nations specialised agency with responsibility for the safety and security of shipping and the prevention of marine and atmospheric pollution by ships
MARPOL	International Convention for the Prevention of Pollution from Ships
MWPA	Mid West Ports Authority
mtpa	million tonnes per annum
Scorecard	MWPA Balanced Scorecard is a corporate performance dashboard
SOE	Statement of Expectations
SDP	Strategic Development Plan which is implemented via the SOE
Operational Control	A person or entity that exercises the authority over initiating, conducting, managing, or terminating an operation
Operations	A series of actions, motions, or occurrences; a method, mode, or operation, whereby a result or effect is produced; tasks, activities or services
WA	Western Australia
Workers	Individuals employed by MWPA to undertake specific functions and tasks as detailed within the employee's individual Position Description and Terms of Employment

1 Introduction

The Mid West Ports Authority (**MWPA**) is strategically located at Geraldton in the Mid West Region of Western Australia. MWPA is responsible for the efficient, safe and effective operation of the Port of Geraldton (**the Port**). MWPA plays an essential role in planning and facilitating trade, developing and maintaining facilities whilst operating in balance with the environment.

The Geraldton Port Authority, established in 1969, was renamed Mid West Ports Authority on 1 July 2014 as part of the Western Australian Ports Reform. MWPA is a Government Trading Enterprise (**GTE**), regulated under the *GTE Act 2022* (**GTE Act**) and the *Port Authorities Act 1999* (**PA Act**). These Acts clearly define the roles of all port authorities and outline accountability and reporting requirements to the State Government.

This Environmental Management Plan (**EMP**) is a key component of MWPA's strategic planning framework. It outlines MWPA's environmental management and continuous improvement programs, structured in accordance with ISO14001:2015 Environmental Management System standard. The EMP demonstrates how MWPA complies with its obligations and enterprise priorities, ensuring port services and activities are managed to prevent and mitigate environmental impacts on the community and environment.

1.1 THE ROLE OF A PORT AUTHORITY

The PA Act confers exclusive control of the Port to MWPA, subject to any direction by the Minister for Ports. The PA Act provides MWPA Board with the powers necessary to perform its functions which include the responsibility to:

- facilitate trade within and through the Port and plan for future growth and development of the Port;
- undertake or arrange for activities that will encourage and facilitate the development of trade and commerce, generally for the economic benefit of the State, using the Port and related facilities;
- control business and other activities in the Port or connection with the operation of the Port;
- be responsible for the safe and efficient operation of the Port;
- be responsible for maintaining the Port property;
- be responsible for Port security; and
- protect the environment of the Port and minimise the impact of Port operations on that environment.

Crown land has been vested in MWPA under the PA Act for Port purposes. MWPA is responsible for the management and planning control on land designated for Port infrastructure and facilities including wharves, jetties, maritime structures, buildings, railway lines, roads, machinery, equipment, vessels, vehicles, and any other associated infrastructure.

1.2 THE PORT OF GERALDTON

The Port of Geraldton is located to the northwest of the city centre of Geraldton, approximately 430km north of Perth in the Mid West region of Western Australia. The Port has been operating in its current location since 1924, with vessels visiting Champion Bay since 1840 and the first export of lead ore occurring in 1849. Significant growth and development of the Port has continued with its current configuration being constructed and commissioned in 2012.

The Port is one of WA's most diverse port operations, catering for the export of grain, iron-ore, mineral sands, metal concentrates, livestock and imports of fuel, fertiliser and general cargo. MWPA holds an Environmental Licence (L4275/1982/15), regulated by the Department of Water and Environmental Regulation (**DWER**), for some of these commodities exported or imported through Geraldton Port. The Port also facilitates cruise ships and other specialist craft.

A total of 87 hectares of land is vested with MWPA, known as the Port Precinct (Lots shaded green in **Figure 2**). The *Port Authorities (Description of Port of Geraldton) Order 2017*¹ provides the following definition of the **Port of Geraldton**:

The Port of Geraldton consists of —

- *the area of water, land and seabed depicted as the Port Area on Deposited Plan 410027 Sheet 1; and*
- *the area of land depicted as the Land Area of Midwest Ports on Deposited Plan 410027 Sheet 2*².

MWPA is currently the manager of all land and waters contained within Reserve 25300 and several freehold title lots immediately south of the Port. The PA Act provides MWPA with the power to authorise the development of land that it owns and/or manages. MWPA Development Guidelines provide further details on land owned and how development activities are managed by MWPA.

MWPA owns and maintains the roads and walkways as well as the infrastructure used to supply utilities within this precinct. These utilities include power, water, sewerage, stormwater and communications.

Assets and infrastructure within the port precinct include:

- Seven commercial berths
- Marine assets including the harbour basin and navigational channel
- Rail corridor equipped with three train unloading facilities
- Storage sheds and a single open stockpile
- Bulk material handling infrastructure
- Tug pen
- Offices, warehouse and workshop facilities
- Cargo container storage and staging area
- Grain terminal
- Maritime and fishing related industries within the Fishing Boat Harbour (FBH)

MWPA leases land to private asset owners who are responsible for managing those assets and operations. Other prescribed activities occurring within the port precinct, such as boatbuilding and seafood processing, are regulated through separate DWER instruments held by the occupiers of these premises. Additionally, the Port facilitates trade, light industry, aquaculture and tourism activities at the Port through its Lease and Port Access and Services Agreements (**PASAs**).

1.2.1 Future Ports

The area defined within the Port Reserve 25300 (**Figure 1**) includes land reserved for the future development of a deep-water port at Oakajee, approximately 23km north of Geraldton. This landholding consists of 180 hectares which has yet to be developed for Port purposes.

The *Ports Legislation Amendment Bill, 2016* was passed to enable the progressive implementation of the 'Tranche 2 Port Governance Reforms' which, once fully implemented, will result in MWPA overseeing the ports of Geraldton, Cape Cuvier and Useless Loop.

¹ As published in Government Gazette No. 34 of 2017

² Figures 1 and 2 are copies of the Deposition Plan 410027



2 Environmental Management Overview

MWPA integrates its regulatory obligations with strategic objectives through its Integrated Management System (IMS), which provides a structured framework to ensure compliance with safety and environmental legislation, safeguarding Port activities and protecting the surrounding environment.

This EMP is a key component of the IMS designed to identify the various legislative requirements and compliance obligations applicable to its operations and services.

2.1 ENVIRONMENTAL MANAGEMENT FRAMEWORK

The MWPA Environmental Management Framework is shaped by legislative and regulatory requirements, relevant standards, and MWPA's strategic objectives. It guides the design and implementation of environmental management programs. **Figure 3** below illustrates the key elements of this framework.

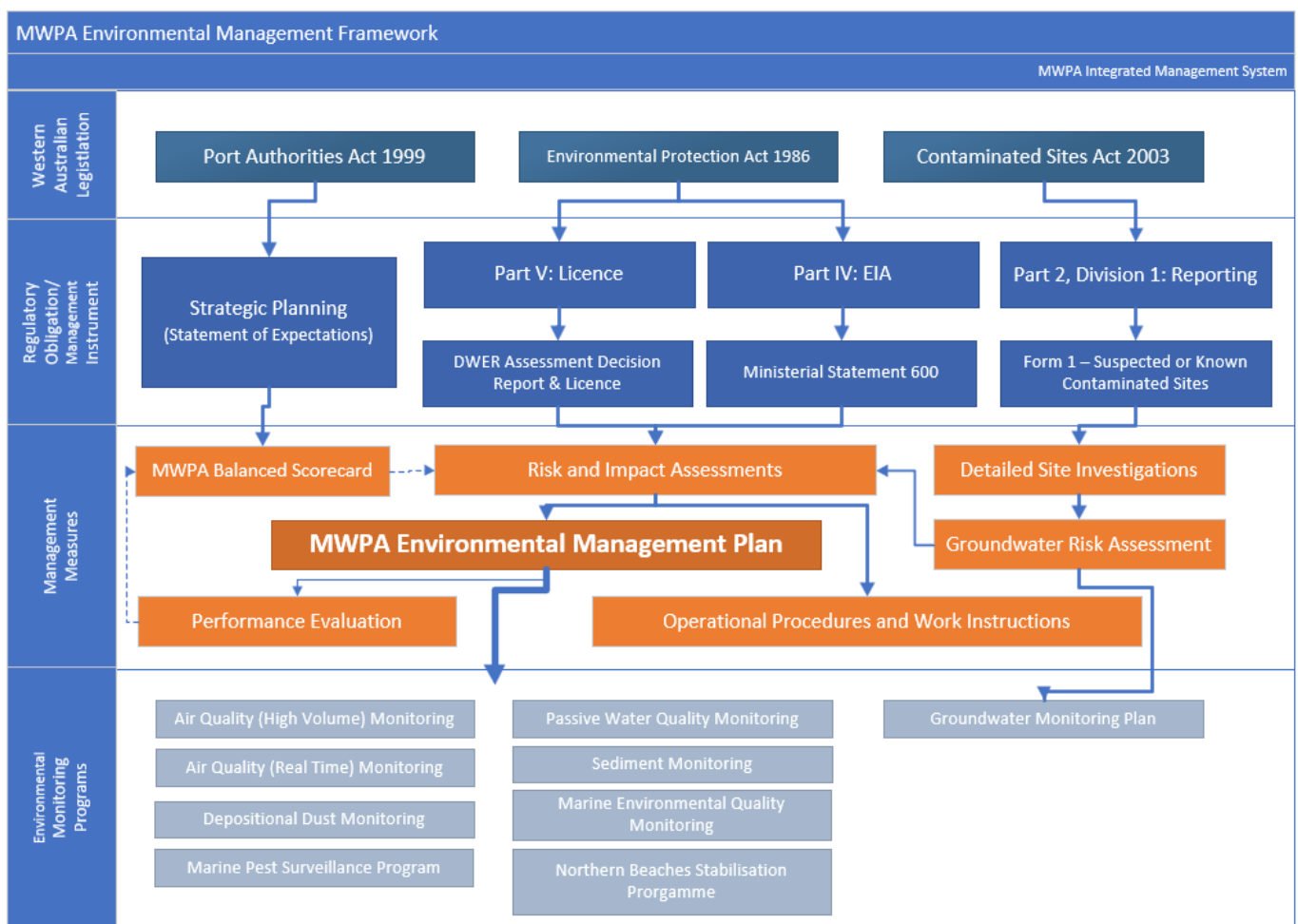


Figure 3– MWPA Environmental Management Framework

2.2 EMP PURPOSE AND OBJECTIVES

This EMP defines MWPA's approach to environmental management within the IMS, aligning with ISO14001:2015 principles. It outlines how MWPA ensures compliance with environmental legislation and standards, manages risks and opportunities and supports continual improvement in environmental performance.

The EMP serves as both a strategic and operational tool to guide MWPA in achieving its environmental and sustainability objectives while meeting regulatory and stakeholder expectations. It is a key component of MWPA's strategic planning framework (refer to Section 5 - Planning). The EMP aims to:

- describe the role and responsibility of the Port Authority;
- identify the environmental risks associated with the Port activities;
- outline how these risks are managed or mitigated by the Port Authority with minimal impact to the surrounding Port environment;
- underline the Port Authority's environment objectives and targets for the current financial year and subsequent years;
- provide a framework for ensuring environmental performance is continuously and systematically monitored and where necessary changes are made to improve performance;
- provide an overview of how the EMP facilitates or ensures compliance and meets requirements under the *Environment Protection Act 1986*; and,
- capture the Port's significant environmental aspects, performance goals, and processes for meeting these goals (refer to Section 5.1).

The present statutory framework requires that Port Authorities submit an EMP annually along with its Statement of Expectations (SOE) for approval by the Minister for Ports. The SOE meets the intent of the Strategic Development Plan required under the GTE Act.

3 Organisational Context

MWPA's purpose is '*to provide a sustainable gateway for trade and tourism*'; facilitating trade by being a profitable, cost effective and an efficient logistics provider based in Geraldton, in Western Australia's Mid West servicing regional Australia.

WA Port Authorities are governed under the PA Act and operate as corporatised entities, each with a board of directors that reports to the Minister for Ports.

Port Authorities are both landlords and strategic managers of the ports under their control. It is the Port Authorities' obligation to ensure efficient operational management of its ports and development of trade for the economic benefit of the State. When performing their functions, Port Authorities are expected to operate in a manner that is commercially focussed, transparent and accountable.

3.1 UNDERSTANDING THE CONTEXT

The function and duties of a Port Authority regarding environmental protection include:

- to control maritime transport;
- to control the loading and discharging of goods;
- to exercise regulatory functions for the protection of the environment;

- to discharge or facilitate the discharge of international obligations of the Port Authority with respect to marine safety and protection of the environment; and
- to act as the incident management team for emergencies within the Port or on its land or waters.

MWPA achieves its duty to protect the environment by aligning its strategic objectives with sustainability principles and integrating management actions into its business processes via the IMS (refer to Section 5).

3.2 UNDERSTANDING THE NEEDS AND EXPECTATIONS OF INTERESTED PARTIES

MWPA identifies relevant external and internal environmental management and sustainability issues that are of interest to, or are a concern of, interested parties through a range of mechanisms including stakeholder surveys, engagement activities, and via community and customer feedback.

The needs and expectations of these interested parties are assessed and incorporated within the MWPA CAMMS database as compliance obligations.

MWPA categorises its Interested Parties as follows.

- MWPA Board of Directors
- MWPA Workers
- Regulators and Government agencies
- Certification Bodies
- Stakeholders

‘Stakeholders’ is a broad category that includes interested parties of a commercial, lease, community and not-for-profit nature.

The **IMS Plan** provides further details on how MWPA identifies and maps its interested parties, their needs and expectations.

3.3 THE SCOPE OF THE ENVIRONMENTAL MANAGEMENT PLAN

This EMP applies to all MWPA workers, its localities, facilities, operated vessels and business activities.

MWPA leases land to export customers, issues licenses to stevedoring companies to facilitate the provision of services within the Port and enters into PASAs to allow access to common user facilities and berths. As part of entering into these agreements, each customer is required to develop the necessary environmental management plans and procedures to demonstrate compliance with their legal requirements and MWPA’s Environmental Licence.

3.3.1 Exclusions

Activities and services within the FBH and leased areas, that MWPA does not have direct operational control over, are excluded from the scope of the MWPA IMS (and this EMP). These activities must be carried out by the Occupier / Leaseholder in accordance with any relevant lease arrangements and in compliance with all relevant state legislation.

3.4 INTEGRATED MANAGEMENT SYSTEM

MWPA operates under an Integrated Management System certified to three international standards:

- ISO 9001:2015: Quality Management System
- ISO 45001: Work Health and Safety Management System

- ISO 14001:2015 Environmental Management System

The IMS is described in detail in MWPA's Integrated Management System Plan (**IMS Plan**). The IMS provides the framework through which MWPA demonstrates leadership and fulfils its management commitments to achieving its objectives, goals and targets. This EMP supports MWPA in maintaining ISO 14001 certification by detailing how:

- environmental aspects are managed;
- compliance obligations are fulfilled; and
- risk and opportunities are identified and addressed.

All plans, procedures and other controlled documents that pertain to environmental management activities will be referenced within this EMP.

4 Leadership and Commitment

4.1 ENVIRONMENTAL POLICY

MWPA has established an [Environmental Policy](#) that demonstrates the organisation's commitment to minimising environmental impacts associated with Port operations and emphasises continual improvement in environmental management.

The Environmental Policy commits MWPA to:

- planning and outcome-based decision making that is underpinned by environmental management and sustainability principles that:
 - ensure resources are used efficiently, particularly energy, water and raw materials;
 - minimise waste and emissions to prevent pollution;
 - protect public health and improve social amenities;
 - identify and manage environmental risks, to minimise impacts; and
 - provide stewardship of Champion Bay through environmental leadership.
- protecting and improving air, land, water and habitat quality within its boundary of control, and where practical and feasible, influence beyond these boundaries;
- ensuring that commercial arrangements with customers include strong environmental awareness, management actions and performance measures;
- identifying and managing legacy contamination, including remediation where practical and warranted to minimise impact;
- complying with all applicable environmental legislative requirements as a minimum standard, and the guiding principles of ISO 14001, 'Environmental Management Systems';
- establishing, monitoring, reporting and auditing performance against environmental objectives and targets to ensure MWPA environmental commitments are met; and
- developing and implementing innovative programs and initiatives to advance environmental stewardship, mitigate impacts, and drive continuous improvement.

The Environmental Policy is reviewed periodically by the Executive Leadership Team, and requires approval from the Board of Directors, to ensure its relevance, effectiveness and alignment with current legislation. Following each review, the updated policy is communicated within the organisation and made available on MWPA's intranet and public website.

As part of management review cycles, policies are updated to reflect MWPA's commitment to environmental management, meeting customer and stakeholder expectations while upholding high standards of service quality.

4.2 ROLES, RESPONSIBILITIES AND AUTHORITIES

All workers, contractors, and other positions under the direct control of MWPA have a general duty under the WA *Environmental Protection Act 1986* to:

- *not cause or allow serious environmental harm or material environmental harm; or*
- *not intentionally or otherwise, cause pollution or an unreasonable emission from any premises.*

The IMS Plan provides specific details on roles and responsibilities within the MWPA organisational structure. The roles, responsibilities and authorities for environmental management are clearly defined to ensure accountability and effective communication at all levels of our organisation. An overview of the organisation roles, responsibilities and authorities in relation to environmental management at key levels within MWPA are displayed in **Table 1**.

Table 1 – Key Roles and their Environmental Responsibilities Within MWPA

Role	Responsibility
Board of Directors	The Board is the governing body and is charged with performing the functions, determine the policies and control the affairs of MWPA.
Chief Executive Officer and Executive Leadership Team	The CEO provides the necessary leadership and direction to the Port Authority, including shaping the values and principles by which it operates. Members of the Executive Leadership Team are responsible for ensuring environmental accountability within their specific function.
Chief Environmental, Social and Governance Officer	The Chief Environmental, Social and Governance Officer is responsible for providing strategic leadership in the areas of people, organisational capability, occupational health, safety, sustainability and environment portfolios for the Port Authority. As a member of the Executive Leadership Team, the role is key to supporting the Port Authority's Strategic Plan, sustainable development, operational functionality and to embedding the organisational values into the workforce and organisational culture.
Environment Manager	The Environment Manager's primary responsibility is to ensure compliance with all relevant legislation, the Port's Environmental Licence and compliance obligations, while ensuring that all operations and development are conducted in a sustainable and environmentally responsible manner. The role is also responsible for actively promoting sustainability and environmental initiatives in the workforce and maintaining a strong environmental focus at an operational level. The Environment Manager will support the Executive Leadership Team to implement sustainable development principles and business practices as part of the businesses commitment to developing and enhancing the Port's sustainability outcome and profile.
Harbour Master	Harbour Master is responsible for ensuring safe and efficient movement of vessels through the Port and ensuring their activities are undertaken with minimal impact to the Port's marine environment. The Harbour Master undertakes the key role as Incident Controller in the event of a marine oil pollution emergency.

Role	Responsibility
Leadership Team	The Leadership Team supported by the supervisory roles within the business are responsible for managing operations and services in compliance with this Plan, business processes and procedures.
Environment Team	The Environment Team provides tactical day-to-day advice on environmental matters, implements monitoring programs and executes compliance obligation and reporting requirements.
Integrated Management System Coordinator	The IMS Coordinator is responsible for implementing, coordinating and maintaining an efficient and effective IMS; leading quality assurance and business improvement initiatives with all teams across MWPA, to ensure that required standards are met; and assisting with the training and promotion of the IMS System, processes and procedures to all workers. The position works with the Environment Manager to prepare for and maintain IMS certification with the ISO14001 standard. The IMS Coordinator coordinates the review of policy and process documents and procedures.
Workers	Workers must comply with procedures and work instructions and the directions of their supervisors, and/or MWPA representative to ensure MWPA environmental objectives and commitments are met.
Contractors	Contractors and service providers are required to adhere to the EMP when operating on behalf of or directly for MWPA.
Lessees	Lessees must adhere to the conditions in their commercial agreements with MWPA to ensure the environmental impacts from their activities are managed.

5 Planning

5.1 ADDRESSING RISKS AND OPPORTUNITIES

MWPA identifies risks and opportunities based on its operational context, the needs and expectations of interested parties and the significant environmental aspects of its activities. This process ensures that MWPA's environmental objectives are achieved, and that potential threats or opportunities are managed effectively.

MWPA employs a structured risk management approach as outlined in the MWPA **Risk Management Procedure**. This Procedure provides guidance on applying consistent and comprehensive risk management for determining how risks and opportunities are identified, analysed, evaluated, treated, monitored and reported.

MWPA uses the CAMMS database to maintain risk registers, categorised as follows.

- **Strategic:** Being the 'significant risks' and/or opportunities, for the business to achieve strategic goals.
- **Tactical:** Being risks and/or opportunities, to effectively and efficiently deliver specific services.
- **Operational:** Being the risks that could impact goals and objectives for Health, Safety, Environment Quality and Production.
- **Project:** Being the 'significant risks' identified for specific projects or developments.

Each register considers the activities, risks, causes and impacts, with risks rated pre- and post-implementation of controls to assess their significance. Risks are classified as 'Significant' if the Risk Rating is Moderate or higher (per the MWPA *Risk and Opportunity Matrix*) and are prioritised for action.

The risk registers are regularly reviewed by senior managers, to verify the information remains current, evaluate the effectiveness of existing controls and allocate risk treatment actions to improve performance.

For project specific risks, impact assessments are documented in project records (for example, Excel workbooks). Significant project risks are integrated into the CAMMS Risk and Project modules for oversight and management.

5.1.1 Environmental Aspects

Environmental aspects refer to the elements of MWPA's activities or services that can interact with the environment, including emissions, discharges and operations processes. MWPA identifies and evaluates its significant environmental aspects through environmental impact studies, project risk assessments and management review.

Environmental impacts are changes or effects, both adverse or beneficial, that could or have resulted from MWPA activities. These impacts are assessed based on their potential to influence the environment, community and MWPA's ability to achieve its objectives.

The below table (**Table 2**) provides an *Environmental Risk Assessment Summary* for the Geraldton Port and presents risks associated with the handling of bulk mineral products which have been classified as '*Significant*'. Risks classified as *Moderate* or higher are considered 'Significant' risks for MWPA. The assigned risk rankings are based on potential social and environmental impacts as well as considering the impacts to business objectives as a result of managing and mitigating the risk to the environment.

Any project or development proposal that is identified as likely to have a significant effect on the environment is subject to rigorous assessment and referral for regulatory approval.

Table 2 – MWPA Potential Emissions, Environmental Aspect and Potential Impacts

Source – Pathway – Receptor Analysis					Management Measures		MWPA
Potential Emissions	Activity / Sources (Aspect)	Potential Receptors	Potential Pathways	Potential Impacts	Mitigation Measures / Controls	Compliance Assurance Programs	Risk Rating
Air, emissions – Particulates (dust)	Truck and rail in-loading or out-loading				Covered truck trailers and treated rail cars. Trucks discharged within sheds or via dedicated truck unloaders. Sheds and truck unloading facilities fitted with dust extraction systems and dust collectors (baghouses). Dedicated rail car dumpers / unloaders connected directly to storage sheds via covered conveyor systems. Sealed roads within mineral storage areas. Inspections of lease facilities. Routine road sweeping of common use areas.	Lease Agreements, Port Access and Services Agreements. Inspections by relevant MWPA supervisors (Rail, Operations). MWPA inspections of leases. Routine maintenance inspection of MWPA unloading facilities.	HIGH Significant [CAMMS Risk Code: SR1011, OR10054, OR10057]
	Stockpiling of bulk materials (including within storage sheds).	Residential Light Industry Fishing Boat Harbour Geraldton Inner Harbour Marine Environment	Air / wind dispersion Dust settling on infrastructure or in marine environment.	Impacts to human health through inhalation of particulates. Impacts to amenity at nearby sensitive receptors resulting in nuisance dust – visual dust emissions, dust deposition on private property, public roads users and complaints.	Bulk materials are stored within enclosed sheds (except for Talc). Negative pressure dust extraction systems installed on iron ore and metal concentrate sheds and on bulk handling transfer points. Product moisture levels (DEM). Sprays, misters or dry fogging used for dust suppression of stockpiles, conveyors and ship loaders. Shielding stockpiles from prevailing winds with fencing.	Compliance audits against Environmental Licence conditions and Lease Agreements.	
	Transfer points within the bulk handling facility, shiploaders and other supporting equipment (including hoppers and emissions from vessel hold).	Foreshore / Recreational Areas	Resuspension of particulates in high wind conditions and severe weather.	Introduction of suspended solids, nutrients or soluble metals to the marine environment.	Berth specific bulk material loading procedures. Enclosed or wind shielded conveyors systems. Integrated control systems to prevent overloading of conveyors to prevent spillages. Dust extraction systems on conveyors and suppression systems (for example, dry fogging, sprays, foam) fitted to transfer points and shiploaders. Cascade chute on shiploader for loading dry products. Operational procedures for loading concentrates including loading rates, wind and product moisture parameters. Post-shipping berth handover procedures (for example, sweeping and wash down of facilities). Prompt clean-up of spillage with road sweepers or vacuum truck. Waste mineral material collected as part of shipping campaigns are returned to product owners.	Continuous monitoring of air quality using specialised interactive software. Automated alert systems to trigger action in high dust conditions. Post shipment air quality monitoring reports provided to Customers. Quarterly and Annual reporting to DWER in accordance with Licence conditions. Licence exceedance reporting to DWER. Complaints and Incident reporting procedures. Targeted Customer and Berth User Operational Review Meetings. Pre-Shipment Forms and moisture certificates.	

Source – Pathway – Receptor Analysis					Management Measures		MWPA
Potential Emissions	Activity / Sources (Aspect)	Potential Receptors	Potential Pathways	Potential Impacts	Mitigation Measures / Controls	Compliance Assurance Programs	Risk Rating
	Unloading (discharging) of bulk materials from Vessels.				Operational and stevedore procedures for unloading bulk granular materials. Prompt clean-up of spillage by hand or with sweeper or vacuum truck. Product specific hoppers used.	Pre-and Post-unloading / Berth handover inspections. Maintenance Testing and inspection program. Maintenance Calibration programs. Stevedore Licenses and Audits.	As Above
Air, Emissions – gaseous (SOx, NOx, GHGs)	Vehicle, vessel and equipment use (including marine, rail and road) – Hydrocarbon based fuel, lubricant and power consumption.	Atmosphere Light Industry Fishing Boat Harbour	Direct and indirect emissions	Impacts to human health through inhalation. Impacts to amenity at nearby sensitive receptors. Contribution to global warming through Greenhouse Gas Emissions.	Routine maintenance activities to improve efficiencies. Port infrastructure upgrades. Development and implementation of Sustainability Strategies. Development of an emissions reduction strategy.	Enforce that vessels comply with IMO 2020 requirements for the use of Low Sulphur Fuel Oil and or Exhaust Gas Cleaning Systems. Prohibit vessel use of incinerators within the Commercial Harbour. Scope 3 Emissions Inventory RightShip Maritime Emissions Portal	HIGH Significant [CAMMS Risk Code: SR1011, OR10072, OR10074]
Noise	Rail and truck Movements, Machinery and Port operations, Shipping Operations.	Residential Light Industry Fishing Boat Harbour Marine Habitats Foreshore / Recreational Areas	Air / wind dispersion Vibration	Noise emissions reaching nuisance levels at adjacent residential and light industry areas. Noise impact to marine fauna (for example, sea birds and sea lions).	Truck haulage via Main Roads WA approved heavy vehicle transport routes. Bulk load out operations from trucks occurs within contained sheds. Traffic management plans and speed restrictions in place. Procurement procedures. Change Management Procedures.	Development based noise assessments. Occupational health noise monitoring. Noise surveys of designated mineral storage areas. Noise modelling studies.	MODERATE Significant [CAMMS Risk Code: OR10015, CR1035]
Discharges of Surface or Waste Waters	Shipping operations (de-ballasting, maintenance activities) Equipment Washdown (material loading and unloading) Surface water (rainwater) runoff Chemical, oil or bulk material spills and uncontrolled discharges Maintenance activities (including sand blasting) Maintenance dredging and seabed levelling	Marine environment Geraldton Inner Harbour Sensitive marine environments or biota and benthic habitats including seagrass communities of Champion Bay. Surface water (storm water) Groundwater	Spill or water discharged from vessels. Direct spills of pollutants or contaminated stormwater or washdown water. Discharge from drains during rainfall. Seepage of contaminants into and through groundwater systems. Migration of sediments containing potential contaminants.	Introduction of marine pests. Temporary and localised increase in suspended solids. Impact to marine water quality and ecotoxicity. Impacts to marine fauna (for example; seabirds, marine mammals, fish, invertebrates, crustaceans) and marine flora (seagrasses). Localised contamination of marine sediments. Contamination of shallow groundwater systems.	Port waste reception facilities and vessel berth applications. Berth design includes dedicated wash down areas to minimise runoff to marine environment. Stormwater treatment (sediment and pollutant traps). Berth specific operational loading, unloading and clean down procedures. Spill plates installed on berths during unloading operations. Spill containment measures (for example, bunding, curbing) and spill clean-up procedures. Hydrocarbon spill kits and spill response procedures. Storage of export products in sheds (except for talc). Road sweeping and vacuum trucks in operation in common use areas. Washdown water from handling equipment is captured within kibbles and Humeceptors prior to treatment.	Project specific environmental monitoring and management plans (for example, site development, construction or dredging activities). Housekeeping standards and inspections. Confirm compliance with IMO and AMSA ballast water management and marine pollution prevention requirements. Asset Management Plans. Maintenance Inspection programs. DPIRD and DAFF vessel risk assessments (via Vessel Check and MARS online assessment tools). Emergency Response drills and exercises (including hosting or participating in the DoT lead State Oil Spill Exercises).	HIGH Significant [CAMMS Risk Code: SR1011, TR1031, OR10054]

Source – Pathway – Receptor Analysis					Management Measures		MWPA
Potential Emissions	Activity / Sources (Aspect)	Potential Receptors	Potential Pathways	Potential Impacts	Mitigation Measures / Controls	Compliance Assurance Programs	Risk Rating
	Sand bypassing (placement of material for beach nourishment)				Vacuum trucks used to recover contaminated water and sediments for offsite disposal at an approved location or returned to mine sites.		
Discharges to Land	Material Loading and Unloading Hydrocarbon and chemical storage areas Reclamation or historical contamination Waste Management	Soil Groundwater Regional Landfill	Direct spills, stormwater or washdown water released to land. Leaching from stockpiles or storage areas into groundwater. Uncontrolled discharges of solid and liquid waste.	Soil Contamination Groundwater Quality Secondary discharge of leachates to marine environment Contribution to landfill	Contaminated Sites Classifications. Groundwater Risk Assessment. Shed containment systems including bunding, sealed and or compacted floors. Minimise storage holding times to minimise need to add additional moisture to product. Routine sweeping and recovery of spilled material. Operational procedures to prevent material being trafficked outside of sheds and storage areas. Designated bunded chemical storage areas. Hydrocarbon spill kits and spill response procedures. Berths sealed with concrete or bitumen to prevent contamination. Waste Management Procedures. Designated waste storage and collection areas.	HSE review of excavation procedures and permits. Hazard Inspection programs. Development Application guideline and procedures. Pre-and Post-unloading / Berth handover inspections. Detailed Site Investigations and submission of Contaminated Sites Voluntary Audit Reports.	HIGH Significant [CAMMS Risk Code: SR1011, TR1031, OR10043, OR10054]

5.2 COMPLIANCE OBLIGATIONS

Identified compliance requirements are captured, monitored and measured within the 'Compliance' module within the CAMMS database. Additionally, MWPA maintains a dedicated *Environmental Compliance Register* to track and document adherence to environmental obligations, conditions and approvals, including historical commitments.

MWPA subscribes to *Workplace Safety Australia Pty Ltd*, a web-based program that provides a database of most legal and other requirements relating to Work Health, Safety and Environment. A link to the program and password details is provided on the MWPA intranet. A regular update email is sent to MWPA Workers registered to receive updates on changes in legal and other requirements.

Maritime industry changes are also monitored through *Workplace Safety Australia Pty Ltd*, industry news and working groups, membership in Ports WA and Ports Australia, subscription to State Government Gazette and/or through subscribing to the State Government legislation notification services.

On a day-to-day basis MWPA manages and monitors its operations to achieve its obligations under the following environmental laws, and regulations.

5.2.1.1 Port Authorities Act 1999

Section 3 and Section 4.2 of this Plan outline MWPA environmental roles and responsibilities under the *Port Authorities Act*. Part 4, Division 1, s.31 of the PA Act states: '*Nothing in this Act limits or otherwise affects the operation of the Environmental Protection Act 1986 in relation to a port, a Port Authority or Port operations.*' Therefore, the Environmental Protection Act and its subsidiary legislation remain the key environmental laws and regulations applicable to the Port operations.

5.2.1.2 Environmental Protection Act 1986

The *Environmental Protection Act 1986* (EP Act) is administered by DWER. Under the EP Act, MWPA becomes the 'Proponent' or 'person taking action' for development proposals under the relevant State (and Commonwealth) environmental assessment and approval instruments including:

- Part IV: Division 1 and 2 of the Environmental Protection Act 1986 – Environmental Impact Assessment
 - MWPA is obligated to implement Ministerial Conditions issued under Part IV of the EP Act within [Ministerial Statement 600](#) (Geraldton Port Enhancement Project and Preparatory works for Town Beach Foreshore Redevelopment).
- Part V: Division 3 of Environmental Protection Act 1986 – Environmental regulation MWPA holds the following Part V Environmental Licence:
 - **Environmental Protection Act 1986 Licence:** [L4275/1982/15](#).

The implementation of this EMP satisfies the requirements of the licence conditions related to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

In addition to the MWPA Environmental Licence, all activities and services provided by MWPA are subject to environmental protections regulations designed to control specific emissions and discharges within WA. Refer to Section 13. *References*, of this Plan.

Section 5.1.1 *Environmental Aspects* describes MWPA potential emissions and discharges and the Ports environmental management controls, performance monitoring and reporting programs.

- **Environmental Protection (Clearing of Native Vegetation) Regulations 2004, Permit:** [CPS 10011-1](#).

Clearing permit CPS 1011/1 was granted 19 August 2023 under section 51E (5) of the EP Act for the establishment of the Tourism Jetty approach channel. The permit is valid to 19 August 2028 and allows for clearing of no more than 0.62 hectares of seagrass (native vegetation), during seabed leveling activities required to maintain declared depths.

5.2.1.3 Contaminated Sites Act 2003

The *Contaminated Sites Act 2003 (CS Act)* sets out the obligations for landowners in regards to monitoring and management of contamination.

MWPA manages the potential impacts of contaminated land through its *Development Application* and *Permit to Work and Authority to Work* processes and monitors impacts to groundwater as part of its annual groundwater monitoring program.

As a development authority MWPA has a statutory role regarding land use planning within Port land and waters. MWPA provides advice under its development application process, specific to proposals that may impact water and soil resources, the environment or public amenity.

MWPA has a statutory obligation under the CS Act to advise DWER of plans to subdivide or develop Port land, where a memorial has been registered on the land title due to the presence of confirmed or possible contamination.

5.2.1.4 Biosecurity Act 2015 (Commonwealth)

The Commonwealth Department of Agriculture, Fisheries and Forestry (**DAFF**) administer the *Biosecurity Act 2015* and *Biosecurity Regulation 2016*. Subsection 229 (1) of the *Biosecurity Act 2015* provides for ports in the Australian territory to be determined a 'First Point of Entry' (**FPOE**) for specified international vessels and imported goods.

Biosecurity 'Determinations' ensure that vessels and goods that arrive in an Australian territory from overseas, arrive at a location that has the facilities available to assess any biosecurity risk and manage it to an acceptable level.

- **Biosecurity (First Point of Entry—Port of Geraldton) Determination 2019 ([F2019L00765](#))**

This regulatory instrument that demonstrates that the MWPA has met the requirements of the Biosecurity Act allowing for the following vessels and goods to enter the Port.

- International commercial and passenger vessels
- Passenger baggage carried on a passenger vessel (and cannot disembark the vessel)
- Inorganic Bulk Goods
- Waste

Ports that do not have a determination under Section 229 of the Biosecurity Act are classed as 'non-first points of entry'. The Port of Geraldton has not been assessed against all the relevant '*FPOE Biosecurity Standards*' and does not have the appropriate infrastructure or processes in place to manage certain biosecurity risks.

- **Port of Geraldton is a Non-First Point of Entry** for the following.
 - Freight Containers
 - General Goods
 - International non-commercial vessel (for example, private, recreational)
 - Non-commercial vessel waste
 - Non-commercial vessel baggage

Vessels or goods arriving at a port that is not a first point of entry must gain prior approval from DAFF using the Australian Maritime Arrivals System (**MARS**).

5.2.1.5 International Conventions

Port Authorities have an obligation to ensure maritime transport, the loading and discharging of goods, incidents and emergencies within the Port waters or on its land are done so in compliance with its international obligations to protect the environment and control marine transport activities safely.

- ***International Convention for the Prevention of Pollution from Ships***

The *International Convention for the Prevention of Pollution from Ships (MARPOL)* was adopted in 1973. The MARPOL Convention deals with pollution by oil, chemicals, harmful substances, garbage, sewage, air pollution and emissions from ships.

The Commonwealth legislation giving effect to MARPOL includes:

- *Protection of the Sea (Prevention of Pollution From Ships) Act 1983;*
- *Navigation Act 2012 (Chapter 4); and*
- *Protection of the Sea (Prevention of Pollution From Ships) (Orders) Regulations.*

The Western Australian legislation giving effect to MARPOL is:

- *Pollution of Waters by Oil and Noxious Substances Act 1987.*
- ***Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (London Protocol)***

The *Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, 1972* is known as the **London Convention**. The 1996 **Protocol** to the London Convention, which entered into force in 2006, will eventually supersede the 1972 Convention. The 1996 Protocol prohibits the dumping of wastes at sea, except for certain materials on an approved list within the 1972 London Convention.

The Commonwealth legislation giving effect to London Protocol includes:

- *Environment Protection (Sea Dumping) Act 1981;*
- *Seas and Submerged Lands Act 1973; and*
- *Environmental Protections and Biodiversity Conservation Act 1999.*

MWPA provides 'Port Reception Facilities' for visiting vessels including access to water, fuel, power and waste disposal facilities. MWPA provides waste management and marine discharge guidance to vessel masters and shipping agents in accordance with the above legislation, relevant *Marine Orders*, the *Biosecurity Act 2015*, the *EP (Unauthorised Discharges) Regulations 2004*, *MARPOL (Annex I, II, III) Port Authorities Regulations 2001* and the *WA Fish Resources Management Act 1994*.

MWPA also gives careful consideration to Commonwealth legislation, the London Convention and Protocol as part of its Harbour and Channel Dredging Strategy as explained further in *Section 5.1.1 Environmental Aspects*.

- ***International Convention on the Control of Harmful Anti-fouling Systems on Ships (AFS)***

International Convention on the Control of Harmful Anti-fouling Systems on Ships was agreed in 2001. It prohibits the use of harmful organotins in anti-fouling paints used on ships and will establish a mechanism to prevent the potential future use of other harmful substances in anti-fouling systems. It entered into force in 2008.

At a Commonwealth level, under the *Biosecurity Act 2015*, DAFF implements the [Anti-fouling and In-water Cleaning Guidelines 2024](#) (currently in draft review period) and the [Australian Biofouling Management Requirements 2023](#) which specifying best practice approaches to applying, maintaining, removing, and disposing of anti-fouling coatings. Additionally they provide

In Western Australia, the Department of Primary Industries and Regional Development (**DPIRD**) – Aquatic Pest Biosecurity Section, under the *Fish Resources Management Act 1994* has developed a ‘*Biofouling Biosecurity Policy 2017*’ and released a [Guidance Statement for In-water cleaning of Vessels in WA 2017](#).

As a Port Authority with jurisdiction over waters in which vessel cleaning may take place, MWPA works with DPIRD Fisheries, the lead for aquatic biosecurity in Western Australia, to implement marine pest surveillance programs and authorise any in-water cleaning and maintenance activities involving the removal of anti-fouling coatings.

- ***International Convention for the Control and Management of Ships’ Ballast Water and Sediments***

The *International Convention for the Control and Management of Ships’ Ballast Water and Sediments* was adopted in 2004, to prevent the potentially devastating effects of the spread of invasive harmful aquatic organisms carried by ships’ ballast water.

DAFF provide guidance via the [Australian Ballast Water Management Requirements 2020](#) on how vessel operators should manage ballast water when operating within Australian seas in order to comply with the *Biosecurity Act 2015*.

MWPA does not permit the disposal of high risk ballast water or ballast tank sediments within Port waters.

5.3 PLANNING ACTIONS

Environmental management and sustainability principles are integrated into the business processes that establish objectives, measure performance against goals and evaluate the effectiveness of management actions.

Figure 4 illustrates how environment and sustainability requirements are integrated within the MWPA organisational planning processes. Please refer to the IMS Plan for additional information on MWPA Business Planning and Management Review processes.

Environmental Policy

The Board and CEO set the MWPA Environmental Policy for the organisation in consultation with the Executive Leadership Team. The Policy sets overarching objectives to provide direction to the business with respect to environmental and sustainability expectations (refer to Section 5.2).

MWPA Strategic Objectives

MWPA is first and foremost focussed on meeting the needs of its customers along with fulfilling all regulatory obligations. MWPA undertakes strategic planning activities including the development of a Port Master Plan with a 15 to 30 year focus on growth and trade. These documents inform the Port’s medium to short term plans including the Port Maximisation Plan and SOE.

The strategic objectives developed within these planning documents provide the foundations for sustainable development. A long-term Sustainability Framework will be implemented through the development of business wide objectives and targets (refer to Section 5.4).

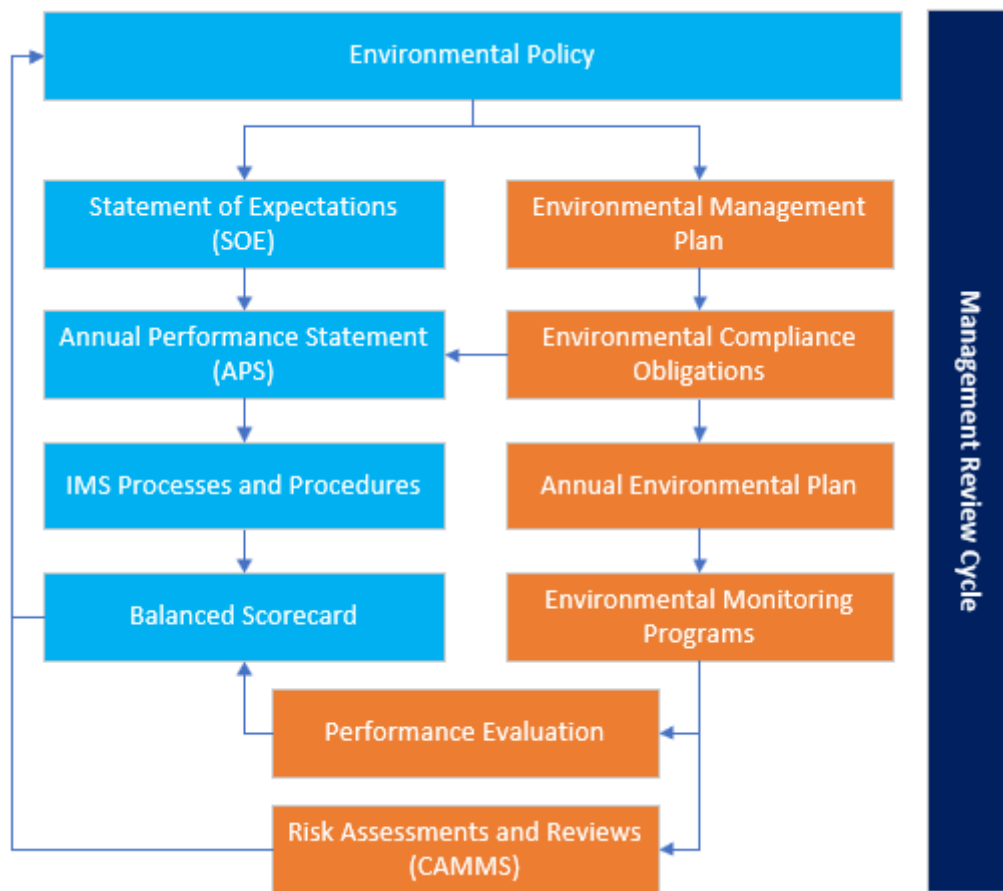


Figure 4 – Integration of Environment and Sustainability within the MWPA Organisation

Statement of Expectations (SOE)

The SOE provides the strategic framework over a five year period for the development and implementation of the MWPA Sustainability Framework and environmental management actions. The SOE meets the intent a Strategic Development Plan as required under the GTE Act.

The 2025-2030 SOE establishes the following Strategic Objectives and goals which are relevant to this EMP and based on MWPA sustainability framework pillars.

Table 3 – MWPA Strategic Objective Goals

Strategic Objectives	Goals
Objective 1 Facilitate, Protect and Grow Efficient Trade and Tourism	Improve Revenue Diversification and Growth Improve Underlying Profit Improve Long-Term Business Value
Objective 2 Provide Infrastructure that Enables Customers' Supply Chains	Provide Long-Term Marine Infrastructure Provide Long-Term Land Management Provide Long-Term Digital Infrastructure

Strategic Objectives	Goals
Objective 3 Operate as an Exemplary Corporate Citizen	To be an Environmentally Sustainable Port Provide a Safe Workplace Operate in Harmony with our Stakeholders Operate in Good Governance

Annual Environmental Plan (AEP)

The AEP is developed each year to inform the budget cycle and resource strategy for the following financial year. The AEP is informed by and considers the following inputs.

- Annual revisions to the Business Objectives, Goals and Deliverables.
- Government Policies and Directives.
- The Port Master Plan and associated development strategies.
- Incident and environmental monitoring trends.
- Outcomes of audits and change management processes
- Environmental impact and risk assessments.
- Benchmarking and industry best practice reviews

The AEP is submitted to the Minister for Ports along with the SOE, Strategic Asset Plan and Annual Performance Statement to satisfy the requirements of GTE Act.

MWPA Balanced Scorecard (Scorecard)

The Scorecard maps out the strategic objectives and goals and provides metrics and targets to enable the business to measure and assess its performance.

5.4 SUSTAINABILITY FRAMEWORK

MWPA has continued embedding sustainability into business planning with an established Sustainability Framework aligned to the United Nations Sustainable Development Goals (2015) and the Ports Australia Sustainability Guidelines. Out of the 17 Sustainable Development Goals adopted by the United Nations, it is considered that the 13 goals depicted in **Figure 5** align with MWPA operations and development plans.

The framework ensures a balanced approach to economic, environmental and social demands, underpinning MWPA's Strategic Plan through the three pillars of People, Planet and Prosperity (**Figure 6**). Through the sustainability framework, MWPA aims to build a sustainable Port in line with the following values.

- **People:** To invest in and engage with the community and our people, leaving a positive legacy for future generations.
- **Planet:** To operate in balance with our environment and ensure ecological values are protected.
- **Prosperity:** To build long-term resilience of the Port and enhance economic prosperity for the region and the state.

Sustainability metrics are established across the business to ensure a measurable and transparent approach to environmental, social and governance aspects. Performance against sustainability metrics is reported annually in the MWPA Annual Report.

SUSTAINABLE DEVELOPMENT GOALS



Figure 5 – United Nations Sustainable Development Goals Relevant to MWPA



PEOPLE

To invest in and engage with the community and our people, leaving a positive legacy for future generations



PLANET

To operate in balance with our environment and ensure ecological values are protected



PROSPERITY

To build long-term resilience of the Port and enhance economic prosperity for the region and the state

Figure 6 – MWPA Sustainability Framework

5.4.1 Climate Change Policy

MWPA is committed to addressing climate change as a core component of its Sustainability Framework. Guided by its [Climate Change Policy](#), MWPA seeks to decarbonise its operations, support low-carbon technologies, and engage collaboratively with stakeholders to reduce supply chain emissions. The policy aligns with the Task Force on Climate-related Financial Disclosures (TCFD) and emphasises proactive risk management, adaptation planning, and climate resilience in port operations and development. Through monitoring and reporting progress, MWPA demonstrates leadership in mitigating climate impacts while contributing to the global transition to a renewable energy economy.

The Port has established a detailed inventory of Scope 1 and Scope 2 greenhouse gas (GHG) emissions, including historical and forecasted emissions aligned with trade predictions. Calculated in accordance with the National Greenhouse and Energy Reporting Scheme and audited by a third party, MWPA emission profile, highlights electricity as the largest contributor, followed by fuel consumption in Pilot Boats and other equipment.

In 2023/2024, MWPA developed a Net Zero Transition Plan and committed to:

- a 90% reduction in Scope 1 and 2 GHG emissions by 2030; and
- Net Zero GHG emissions by 2040.

MWPA is also committed to developing an inventory of Scope 3 emissions. This includes partnering with RightShip to estimate GHG emissions from commercial vessels visiting the Port, supporting the International Maritime Organization’s ambitions to reduce GHG emissions from international shipping.

5.4.2 GRESB

MWPA’s commitment to transparency and accountability is demonstrated through participation in the Global Real Estate Sustainability Benchmark (GRESB), where the Port reports on environmental, social and governance (ESG) performance. The GRESB Infrastructure assessment collects, scores and independently benchmarks ESG data for infrastructure assets globally. The criteria, aligned with the Sustainable Development Goals, the Paris Climate Agreement and major international reporting frameworks, evolve over time to reflect changing sustainability expectations. This benchmarking provides MWPA with actionable insights and track progress against industry-leading sustainability standards.



5.5 ENVIRONMENTAL OBJECTIVES AND MANAGEMENT ACTIONS

MWPA has established environmental objectives and management actions in alignment with the WA Environmental Protection Authority ‘*Statement of environmental principles, factors, objectives and aims of EIA, 2021*’ by mapping environmental factors and protection values against the *Themes*:

- | | |
|---------|----------|
| • Sea | • Air |
| • Land | • People |
| • Water | |

Overarching operational objectives, monitoring and management actions are presented in **Table 4** below.

Table 4 – Environmental Objectives, Monitoring and Management Actions Relevant to MWPA Operations

Theme	Factors and Protection Values	Objective	Monitoring and Management
SEA	Benthic communities and habitats <ul style="list-style-type: none"> Habitats of Champion Bay Port waters 	To protect benthic communities and habitats so that biological diversity and ecological integrity are maintained.	<ul style="list-style-type: none"> Native Vegetation Clearing Permit CPS 10011-1 (Seabed clearing) Marine Environmental Management and Monitoring Plan (MEMMP) Benthic Community Habitat Mapping Seagrass Surveys Sediment Monitoring Sampling and Analysis Plan Passive Water Quality Sampling and Analysis Plan Marine Pest Management Procedure DPIRD coordinated State-wide Array Surveillance Program (SWASP) for detection of marine pests Marine project specific Environmental Management Plans, monitoring and close-out reports
	Marine environmental quality <ul style="list-style-type: none"> Recreation and tourism Fisheries 	To maintain the quality of water, marine sediments and biota so that environmental values are protected.	
	Coastal Processes <ul style="list-style-type: none"> Northern Beaches Harbours and Channels Coastal Infrastructure 	To maintain safe, navigable waters while sustaining natural processes that shape and protect the environmental values of the coast. Adapt to sea level rise as a result of climate change.	<ul style="list-style-type: none"> Ministerial Statement 600 Memorandum of Understanding with City of Greater Geraldton Northern Beaches Stabilisation Plan (NBSP) Coastal Processes Management Plan (in development, revision of NBSP) Sustainable Sediment Management Strategy (in development) Sand Bypassing Standard (in development) Seabed Levelling Standard Coastal Processes Studies and Modelling
	Marine Fauna <ul style="list-style-type: none"> Biosecurity 	Operate in balance with marine fauna so that biological diversity and ecological integrity are maintained.	<ul style="list-style-type: none"> Biosecurity Management Plan (in development) DPIRD coordinated State-wide Array Surveillance Program (SWASP) for detection of marine pests Sea Lion Management Plan Wildlife and Pest Management Procedure Project specific Marine Fauna Management Plans Underwater acoustic noise studies and modelling

Theme	Factors and Protection Values	Objective	Monitoring and Management
LAND	Terrestrial environmental quality <ul style="list-style-type: none"> Reclamation areas Legacy land uses 	To maintain the quality of land and soils so that environmental values are protected.	<ul style="list-style-type: none"> Contaminated Sites Management Plan (in development) Contaminated Site Investigations Site Remediation Plans Voluntary Audit Report (VAR) Groundwater Monitoring Plan
	Terrestrial fauna, flora and vegetation <ul style="list-style-type: none"> Beaches and public spaces Biosecurity 	To promote biological diversity and maintain ecological integrity through sound biosecurity practices (and support for community and not for profit organisations).	<ul style="list-style-type: none"> Biosecurity Management Plan (in development) Wildlife and Pest Management Procedure National Bee Pest Surveillance Program Adhoc seabird and shorebird monitoring
	Landforms <ul style="list-style-type: none"> Port leases 	Develop Port land in a manner that is sympathetic to its natural surroundings, neighbours and open public spaces.	<ul style="list-style-type: none"> Port Master Plan Port Development Guidelines FBH Development Plan
WATER	Use and treatment <ul style="list-style-type: none"> Stormwater Groundwater 	To reduce water consumption, maintain the quality of groundwater and ensure surface water discharges are managed to protect environmental values.	<ul style="list-style-type: none"> Water Efficiency Management Plan (WEMP) Groundwater Monitoring Plan
AIR	Air Quality <ul style="list-style-type: none"> Particulates Odour 	To maintain air quality and minimise emissions so that environmental and public amenity values are protected.	<ul style="list-style-type: none"> Dust Management Plan Air Quality Monitoring Sampling and Analysis Plan Depositional Dust Sampling and Analysis Plan Regulatory reporting of air quality results Dust Modelling Studies
	Greenhouse gas emissions (GHG) <ul style="list-style-type: none"> Energy use Intergenerational equity 	To reduce net greenhouse gas emissions in order to minimise the risk of environmental harm associated with climate change.	<ul style="list-style-type: none"> Net Zero Transition Plan Estimating, modelling and tracking of GHG emissions RightShip Maritime Emissions Portal GRESB Infrastructure Annual Assessment

Theme	Factors and Protection Values	Objective	Monitoring and Management
PEOPLE	Social surroundings <ul style="list-style-type: none"> • <i>FBH, Commercial and Industry neighbours and Visual Amenity</i> 	To manage operations in a manner that minimise impact and prevents significant harm to social surroundings and the businesses they support.	<ul style="list-style-type: none"> • Community Consultation Committee • FBH Consultation Committee • Community and Industry Engagement • Community Grants Program • Not-For-Profit Partnership Program
	Human Health <ul style="list-style-type: none"> • <i>Community of Geraldton</i> • Noise 	To protect human health from significant harm.	<ul style="list-style-type: none"> • Noise Management Plan (in development) • Noise Modelling Studies • External Feedback Management
	Cultural Heritage	Advocating for the environment, community and traditional landowners (Past and Present).	<ul style="list-style-type: none"> • Reconciliation Action Plan (RAP) • Yamatji Government Standard Heritage Agreement (in development)

6 Support

The following section outlines the support system specific to the implementation of the EMP, more comprehensive details on the overall IMS are available in the IMS Plan.

6.1 RESOURCES

MWPA allocates resources to meet regulatory requirements, achieve environmental goals, and drive continuous improvement. Resource allocation is informed by aspects and impacts assessments, strategic planning, and annual environmental objectives, covering funding for capital items and environmental initiatives.

6.2 COMPETENCE

MWPA ensures key environmental management roles are filled by qualified workers and supports ongoing training. A mandatory induction, including environmental modules, is required for all workers on MWPA-controlled land and must be refreshed every three years. Environmental requirements are summarised in the Worker and Port User Handbook.

6.3 AWARENESS

MWPA promotes awareness of its policies, objectives, and IMS contributions through emails, CEO updates, team meetings, and other forums. Regular consultations and toolbox meetings foster engagement, while the business-wide Continuous Improvement Program encourages continuous improvement and collaboration.

6.4 COMMUNICATION

MWPA IMS Plan provides an overview of the key communication principles that MWPA uses to communicate and engage with workers, contractors, customers and other relevant stakeholders.

6.4.1 Internal Communication

MWPA fosters regular and open communication on environmental activities with workers and contractors through a range of means, including established forums like committee meetings, CEO updates, team meetings and the intranet.

6.4.2 External Communication

MWPA communicates key environmental performance information to external stakeholders via the Annual Report, website, fact sheets and this EMP, all of which are available on the website.

MWPA actively engages with its customers and other relevant stakeholders to ensure that environmental risks are identified and managed in a collaborative way.

6.5 DOCUMENTS AND RECORDS

MWPA manages environmental documentation and records through its Electronic Document Records Management System (Objective) and ensures internal accessibility via the Document Centre on its intranet. The Document Management Procedure governs the lifecycle of controlled documents to align with business processes, while environmental records are maintained in compliance with the Recordkeeping Plan and retained in designated Objective folders. Detailed guidance on document and records management is provided in the IMS Plan and related procedures.

7 Operation

7.1 OPERATIONAL PLANNING AND CONTROL

7.1.1 Planning and Control

MWPA has integrated environmental management and sustainability principles into the following business processes in addition to the operational processes and procedures for managing the direct impacts to the environment.

- **Design, Fabrication, Installation and Commissioning**

MWPA incorporates environmental and sustainability principles and controls in project assessment tools, engineering standards and development guidelines. Reviewing design and technology early in developing capital project scopes and risk and opportunity assessments ensures the installation of new plant and equipment continues to improve environmental performance and achieve sustainability targets.

- **Management of Change**

MWPA uses a management of change process to ensure changes to business processes are formally assessed to identify the implications of those changes on the business objectives and compliance obligations.

- **Hazard Inspections and Reporting**

MWPA uses a hazard inspection and reporting process to identify opportunities and continually improve operational controls.

- **Procurement**

MWPA has an established procurement system in place which identifies the process required for procuring goods and services in line with sustainability principles and government procurement guidelines.

- **Hazardous Substances and Dangerous Goods**

All chemicals, hazardous substances and dangerous goods are required to be managed and stored in accordance with their associated risk assessment, license and/or regulations including the control, containment and clean-up of spills.

- **Contractor Management**

Contractors to MWPA are required to have in place environmental management plans and/or JSEAs as appropriate and comply with the Port's Worker and Port User Handbook.

- **Lease and Service Agreements**

All MWPA agreements make provision for environmental management requirements and compliance with all applicable legislation.

7.1.2 Handling of Bulk Granular Products

Handling of bulk materials has the potential to generate emissions and discharges that could impact the environment, public health or amenity, *Section 5.1.1 Environmental Aspects* describes how those operational activities and potential emissions sources are identified, with Table 2 outlining the operational mitigation measures and controls implemented to prevent significant impacts. **Table 5** describes the bulk granular products currently approved for import or export through Geraldton Port, and the approval parameters for receiving and handling these bulk products.

Table 5 – Bulk Granular Products

Product Type	Product	Transport Mode	Storage	Handling Method/s
Export				
Unmodified Raw Materials	Clean fill (including non-silica sands, gravel)	Truck	Enclosed storage sheds	Bulk via Berths 5 and 4
	Clean fill (clay)		Rotainer Storage Area	Rotainers via Berth 6
Physically Treated Raw Materials – Metal Ores	Iron ore	Rail and Truck	Enclosed storage sheds	Bulk via Berth 7 and Berth 5
	Manganese ore	Truck		Rotainers via Berth 6
Physically Treated Raw Materials	Mineral sands (including zircon, ilmenite, rutile and leucoxene)	Truck	Enclosed storage sheds	Bulk via Berth 4
	Garnet			Bulk via Berth 4 Bagged via Berth 6
	Talc		Stockpile Storage Area	Bulk via Berth 4
	Mineral Sands Concentrate		No storage on site	Rotainers via Berth 6
Chemically Treated Material – Metal Concentrates	Lead sulphide concentrate (Heavy Precious Metals)	Truck	Rotainer Storage Area	Rotainers via Berth 6
	Copper concentrate			Rotainers via Berth 6
	Zinc concentrate			Rotainers via Berth 6
	Nickel concentrate			Rotainers via Berth 6
	Iron concentrate		No Storage on site	Rotainers via Berth 6
	Lithium direct shipping ore		Enclosed storage sheds	Bulk via Berth 4
	Spodumene concentrate			Bulk via Berth 4
Import				
Manufactured Products	Fertilisers (including urea, potash-, phosphate-, and potassium carbonate-based fertiliser)	Truck	No storage on site	Discharge via Berth 6 using grab bucket or self-discharging vessel, and hopper
Physically Treated Raw Materials	Coal			Discharge via Berth 6 using grab bucket or self-discharging vessel, and hopper
	Heavy Mineral Concentrate			Discharge via Berth 6 using grab bucket or self-discharging vessel, and hopper

7.2 EMERGENCY PREPAREDNESS AND RESPONSE

MWPA Emergency Response Plan has been developed which identifies Port wide emergency risks. Details are included on how emergency response is to be activated for each event type, roles and responsibilities of the emergency response team, contact numbers and emergency response equipment.

Emergency response training occurs through a range of scenarios and exercises (practical and desktop) on a regular basis.

MWPA is the first response for a marine oil spill within Port Waters and may provide assistance, upon request and under the direction of DoT, for marine oil spills along the Mid West coastline. MWPA maintains training and equipment to ensure it is well positioned to respond in the event of an oil spill on water and participates in DoT lead exercises to strengthen and grow MWPA and the states capabilities.

8 Performance Evaluation

8.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

Environmental monitoring programs have been designed to measure the effectiveness of environmental management controls and actions. Additional targeted impact assessments are conducted as required or as identified during the MWPA project risk assessment process.

Environmental monitoring programs have been developed to comply with relevant legislation and regulations and reference relevant standards and guidelines. A risk-based approach has been used to scope and design programs. The following figure provides an overview of key environmental monitoring programs conducted within the Port boundary.

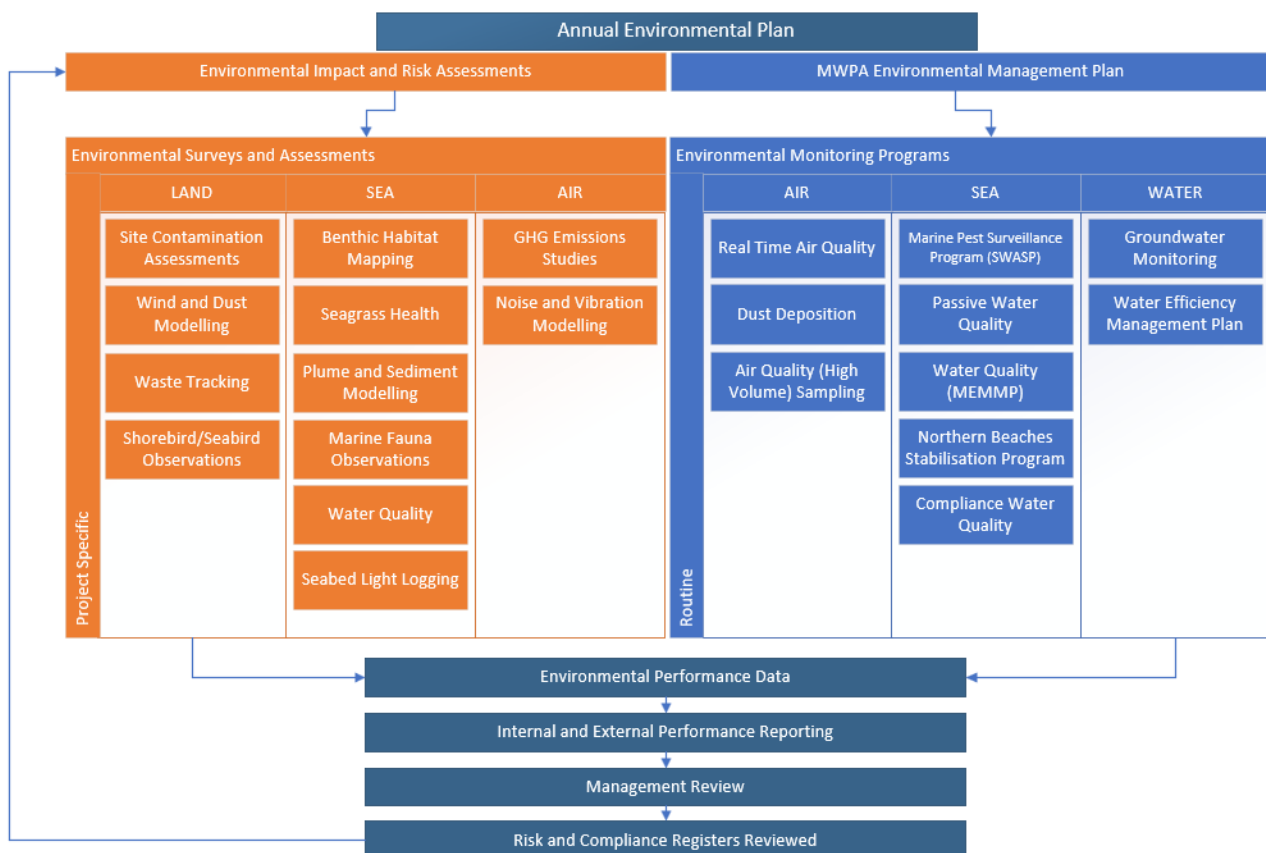


Figure 7 – MWPA Environmental Monitoring and Performance Evaluation

8.1.1 Evaluation of Compliance

MWPA ensures compliance with its Environmental Licence and regulatory commitments through routine assessments, including site inspections, monitoring data reviews, and incident responses. An Annual Audit Compliance Report (**AACR**), Annual Environmental Report (**AER**) and a Quarterly Air Quality Monitoring Reports are submitted to DWER to evaluate management measures and environmental performance. Environmental performance data is regularly reviewed by senior management, and an annual performance review supports the preparation of compliance and reporting documents, such as the MWPA Annual Report and Ministerial Statement 600 Statement of Compliance, which are publicly released.

8.2 INTERNAL AUDIT

MWPA has implemented an IMS Internal Audit Program, detailed within the IMS Plan.

8.3 MANAGEMENT REVIEW

MWPA Management reviews the effectiveness of the environmental management system in accordance with the IMS Plan. Outcomes of the management review cycle may result in the update of Policies, Strategic Development Plans and the business objectives. Environmental management improvements are incorporated into the EMP and the AEP.

9 Improvement

9.1 NONCONFORMITY AND CORRECTIVE ACTION

The **Nonconformity Procedure** describes the process for documenting nonconformity, or an opportunity for improvement (OFI), and the process for recording of corrective or preventative actions within CAMMS Audit. By following this process, MWPA can achieve continual improvement and prevent recurrence of non-conformity.

9.2 CONTINUAL IMPROVEMENT

MWPA is committed to ensuring the effectiveness and continuous improvement of the IMS to enhance environmental performance through the implementation of this EMP, and associated documentation. The annual review and auditing of this EMP ensures that MWPA upholds its commitment to driving continuous improvement through environmental management.

10 Attachments

Document	Title
1	Critical Infrastructure

11 Associated Documents

Document Title
Air Quality Monitoring Sampling and Analysis Plan [A1030106]
Biosecurity Management Plan (<i>in development</i>) [A1770797]
Coastal Processes Management Plan (<i>revision of NBSP, in development</i>)
Climate Change Policy [A1935971]
Contaminated Sites Management Plan (<i>in development</i>) [A1861941]

Document Title
Contaminated Soil and Operational Waste Management Procedure [A1039199]
Dust Deposition Sampling and Analysis Plan [A1030155]
Dust Management Plan [A1619568]
Environmental Compliance Inspection Checklist [A1928100]
Environment Policy [A1111201]
External Feedback Management Procedure [A1834333]
Fertiliser Handling Discharge Monitoring Guideline [A1474126]
Groundwater Monitoring Plan [A1872712]
Hazardous Substances and Dangerous Goods Procedure [A1038613]
HSE Contractor Management Plan [A1385119]
Integrated Management System Plan and Policy Manual [A1463844]
Loading Packaged Bulk Minerals Procedure [A1039213]
Managing Dust from Port Operations Work Instruction [A1036990]
Net Zero Transition Plan [A1936700]
Marine Environmental Management and Monitoring Plan (MEMMP) [A2018695]
Marine Pest Monitoring (SWASP) Sampling and Analysis Plan [A1790071]
Passive Water Quality Monitoring Sampling and Analysis Plan [A1030024]
Permit to Work and Authority to Work Procedure [A1039204]
Sand Bypassing Standard (<i>in development</i>) [A2014767]
Seabed Levelling Environmental Standard [A2032872]
Sediment Monitoring Sampling and Analysis Plan [A1030068]
Worker and Port User Handbook [A2145384]
Sustainable Sediment Management Strategy (<i>in development</i>) [A2002989]
Unloading Products Using Hoppers Procedure [A1032581]
Waste Management Procedure [A1039210]
Wildlife Management and Pest Control Guideline [A1038673]
Work Health and Safety and Environment Approvals Process for New Cargoes [A1702989]

Location – Mid West Ports Intranet – [Document Centre](#), Mid West Ports Electronic Document Records Management System, Objective

12 Records

Document	Title
2025-2030	Statement of Expectations (SOE)
June 2020	Port Master Plan
L427/1982/15	Environmental Licence
F2019L00765	Biosecurity (First Point of Entry—Port of Geraldton) Determination 2019

13 References

Document	Title
International Standard	AS/NZS ISO 14001:2016 Environmental Management Systems – requirements with guidance for use (ISO 14001:2015)

Location - SAI Global - [SAI Global Intertek Inform \(i2i\)](#)

Act or Regulation	Description
<i>Port Authorities Act 1999 (WA)</i>	Part 4, Division 1 Section 30(1)(f) and Section 51(1)(b).
<i>Environmental Protection Act 1986 (WA)</i>	Part IV: Division 1 and 2 – Environmental Impact Assessment Part V: Division 3 – Regulation of emissions and discharges Associated Regulations: Environmental Protection Regulations 1987 Environmental Protection (Abrasive Blasting) Regulation 1998 Environmental Protection (NEMP – NPI) Regulations 1998 Environmental Protection (Noise) Regulations 1997 Environmental Protection (Unauthorised Discharges) Regulations 2004
<i>Biosecurity Act 2015 (Cth)</i>	Division 3 Subsection 229 (1) Determination of ports
<i>Contaminated Sites Act 2003 (WA)</i>	Part 2: Division 1 – Reporting of sites Part 2: Division 2 – Classification of sites Part 3: Division 1 – Person responsible for remediation Part 6: Division 3 – Disclosure regarding contamination, and exemption certificates

Location - Western Australian - <https://www.legislation.wa.gov.au/> | Australian - <https://www.legislation.gov.au/>

Authority	Resource
International Conventions	<i>International Convention for the Prevention of Pollution from Ships (MARPOL), 1973.</i> <i>Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, 1972.</i> <i>International Convention on the Control of Harmful Anti-fouling Systems on Ships (AFS), 2001.</i> <i>International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004.</i>

Location - IMO – <https://www.imo.org>

14 Monitoring, Evaluation and Review

This document is required to be reviewed every two years from the last scheduled review date.

Minor updates made within this two-year period, will not be taken as a full review.

The Document Custodian is responsible for conducting the review in accordance with **Controlled Documents Review and Approval Process Work Instruction**.

15 Administration

Document Custodian:	Environment Manager
Document Approver:	Chief Environmental Social and Governance Officer
Approval Date:	10 February 2025
Document Review Period:	2 yrs

16 Attachment 1 – Critical Infrastructure

