

Port of Geraldton Environmental Management Plan

Prepared by: Mid West Ports Authority

2022-2024

ENVIRONMENTAL MANAGEMENT PLAN 2022-2024

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Definitions

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, Environment and 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: ISO14001, 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
Minister for Transport	The nominated Minister for Ports
mtpa	million tonnes per annum
Scorecard	MWPA Balance Scorecard is a corporate performance dashboard.
SCI	Statement of Corporate Intent
SOE	Statement of Expectations
SDP	Strategic Development Plan which is implemented via the SOE
Staff Member	Individuals employed by MWPA to undertake specific functions and tasks as detailed within the employee's individual Position Description and Terms of Employment.
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.

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 was established in 1969 and on 1 July 2014 was renamed Mid West Ports Authority, as part of the Western Australian Ports Reform. MWPA is a Government Trading Enterprise (**GTE**) and operates under the *Port Authorities Act 1999* (**the Act**) and associated regulations.

MWPA maintains this Environmental Management Plan (**EMP**) as part of achieving its obligations under the Act and commitments as defined in the MWPA Strategic Development Plan (**SDP**) and Environmental Policy. The EMP describes MWPA environmental management and continual improvement programs in a structure aligned to the *ISO14001:2015 Environmental Management System* standard. It is designed to demonstrate how MWPA complies with obligations and enterprise priorities that have been aligned to sustain and manage Port services and activities in a manner that prevents and mitigates impacts on the environment and community in which it operates.

1.1 THE ROLE OF A PORT AUTHORITY

The *Port Authorities Act 1999*, confers exclusive control of the Port to MWPA, subject to any direction by the Minister for Ports. The 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.

MWPA is required to deliver its functions following its SDP which takes the form of a 5 year Statement of Expectations (**SOE**), and is implemented via the annual Statement of Corporate Intent (**SCI**), in compliance with its capital expenditure limits and in a manner that will achieve the financial outcomes as approved by Government.

Crown land has been vested in MWPA under the 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 approximately 430km north of Perth in the Mid West region of Western Australia. MWPA maintains its head office in Geraldton with some corporate services being managed from its Perth Office.

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 Act provides MWPA with the power to authorise the development of land that it owns and/or manages. **MWPA Development Guidelines** (A1337614) provide further details on land owned and how development activities are managed by MWPA.

1.2.1 Activities

The trade facilitated via the Port of Geraldton include operation of an import and export facility and ancillary operations catering for exports of grain, construction sands, mineral sands and mineral concentrates, metal concentrates, livestock, and imports of mineral sands, fertiliser and fuels.

The Port facilitates trade, light industry, aquaculture and tourism activities at the Port through its Lease and Port Services Agreements.

1.2.2 Infrastructure

Port infrastructure and facilities consist of a shipping channel, a seven-berth inner harbour, a large fishing boat harbour, a work boat harbour, land-based infrastructure and associated businesses. Critical infrastructure which relates to Environmental Licence Premises Categories 58 and 58A are described in Attachment 1.

1.2.3 Services

MWPA services include the provision of pilotage, berthing facilities, maintenance, waste disposal, contractor management, security, trade development and emergency services within both the commercial shipping and fishing boat harbours.

¹ As published in Government Gazette No. 34 of 2017

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

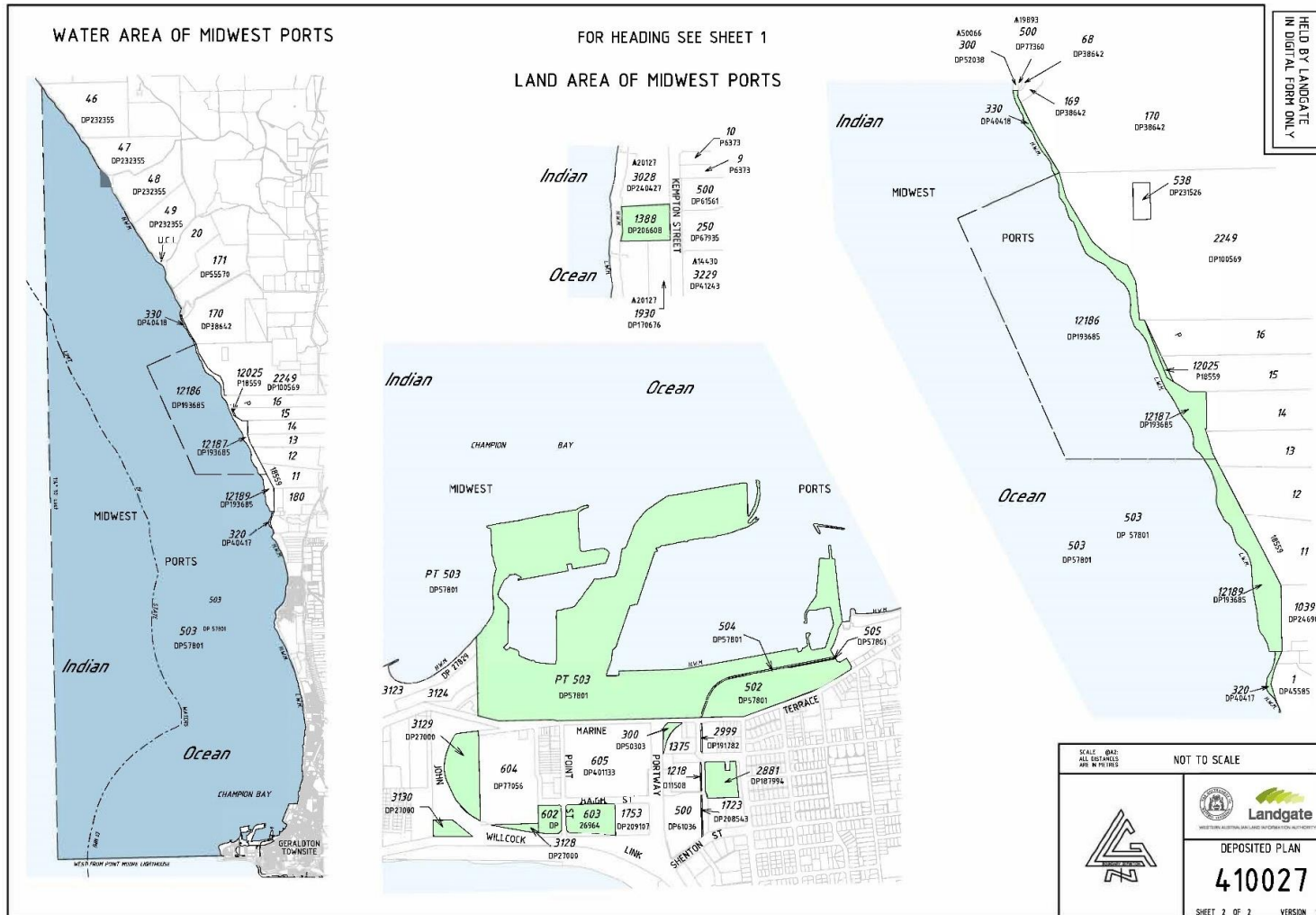


Figure 2 – Water and Land Area of Mid West Ports Authority



Figure 3 – Mid West Ports Authority Environmental Licence Prescribed Premise Boundary

1.3 COMMERCIAL HARBOUR AND BULK HANDLING FACILITIES

The Port of Geraldton is a **Prescribed Premises**³ as defined in *Schedule 1, of the Environmental Protection Regulations 1987*. MWPA is therefore required to hold a Licence issued under *Part V of the Environmental Protection Act 1986*. MWPA Environmental Licence Number is L4275/1982/15 (**the Licence**) with the assigned premises categories included as follows:

Table 1 – Prescribed Premises Categories

Prescribed Premises Category Description	Premises Production Capacity
Category 58 – Bulk material loading or unloading on which clinker, coal, ore, ore concentrate or any other bulk granular material (other than salt) is loaded onto or unloaded from vessels by an open material loading system.	160,000 tonnes per day (cumulative); and 16,000,000 tonnes per annual period (cumulative).
Category 58A – Bulk material loading or unloading premises on which salt is loaded onto or unloaded from vessels by an open material loading system.	

The approved bulk materials are listed within the Licence and summarised in **Table 4** (refer Section 8: Operations, of this Plan).

The current throughput is up to 16 million tonnes per annum (**mtpa**) and anticipated that it may increase up to 50 mtpa over the next 15 years through the implementation of the **Port Master Plan** (A1582831).

1.4 FISHING BOAT HARBOUR

MWPA also supports the region’s largest fishing industry, providing berthing facilities, maintenance, and waste disposal to the commercial Fishing Boat Harbour (**FBH**). The FBH’s principal customers are fishing and aquaculture industries and its supporting trades. The FBH also houses a growing marine tourism industry.

The FBH includes 152 permanent and short-term boat pens and 26 land-based leases. The leases include seafood retail, a licensed vessel fuel facility, boat lifter and boat building and repair yards.

MWPA also manages and maintains surrounding public spaces, walkways, jetties and berths and the FBH’s provision of power, water, sewage, security and communications.

1.5 FUTURE PORTS

The area defined as the Port of Geraldton includes the Oakajee Port reserve located approximately 23km north of Geraldton. This land 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.

The Bill allows for progressive transfer of privately-operated ports from the *Department of Transport* to selected Port Authorities. MWPA will become responsible for the provision of Harbour Master and Marine Safety Services at the ports of Useless Loop and Cape Cuvier which are collectively known as the ‘Port of Carnarvon’. Once implemented, all trading ports in Western Australia will operate under the same legislation.

³ Figure 3 Prescribed Premises

2 Environmental Management Overview

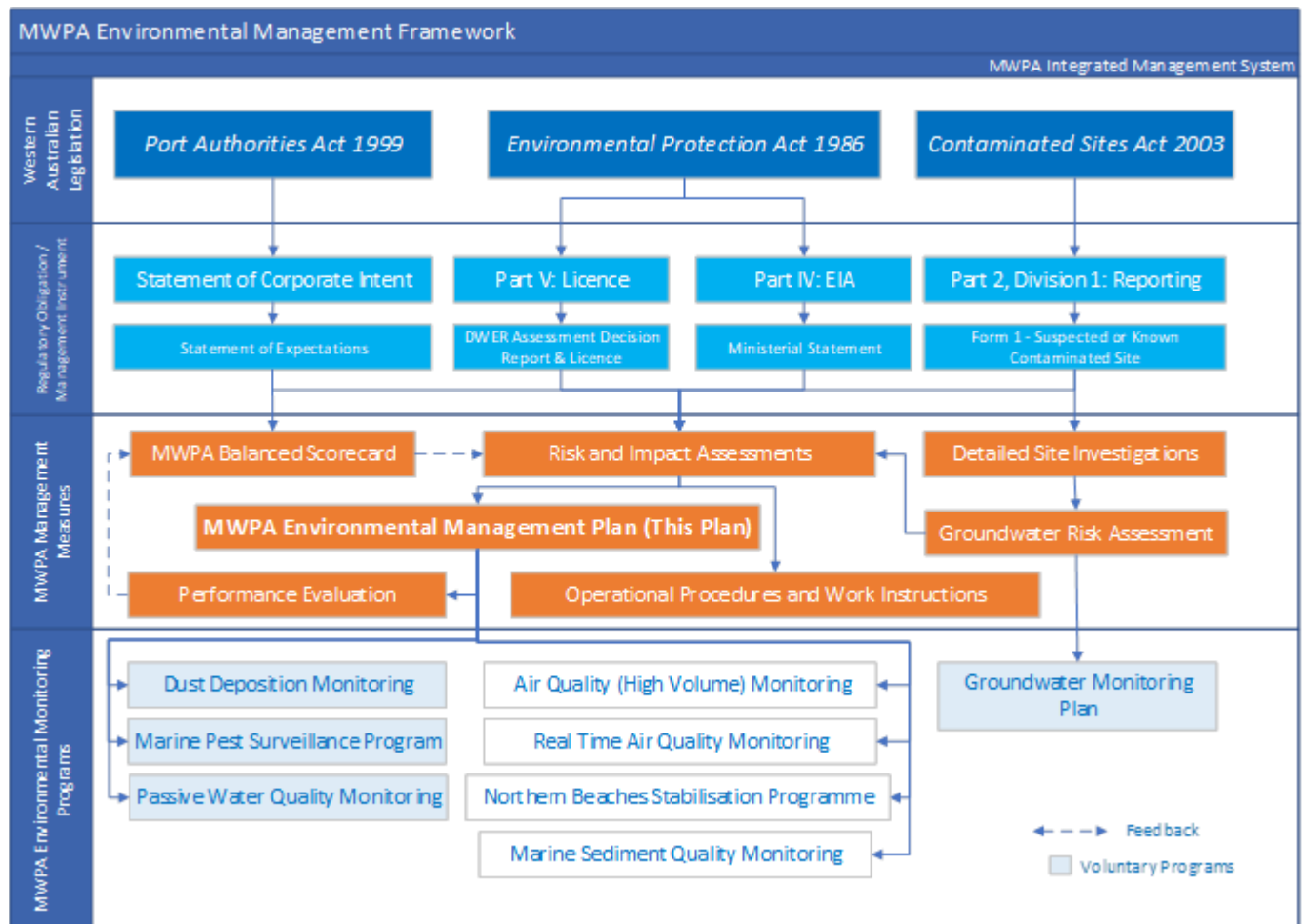
MWPA, through its Integrated Management System (IMS), provides a framework and processes to complement the regulatory requirements that already apply to Port operations and services under safety and environmental legislation (such as marine safety, workplace safety, dangerous goods, and environmental protection legislation) to ensure the safety and security of all Port activities and to help protect the Port environment.

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

2.1 ENVIRONMENTAL MANAGEMENT FRAMEWORK

This diagram outlines the legislative framework under which MWPA environmental management programs have been designed and implemented. The requirements of relevant legislation and standards have shaped the framework, this Plan, and MWPA strategic objectives.

Figure 4 – MWPA Environmental Management Framework



Note – In addition to the monitoring programs shown above, MWPA is developing a Marine Environmental Monitoring and Management Framework as outlined in Sections 6.2.2 (Table 3) and 9.1.

2.2 EMP PURPOSE

The EMP describes how the elements within the above Framework interact and inform MWPA environmental performance evaluation and compliance assurance activities.

This Plan provides a detailed description of the environmental management elements of the MWPA IMS, with a focus on identifying and referencing the various legislative requirements and expectations of associated Interested Parties including Government Agencies, Customers, and the Mid West Community.

2.2.1 Requirement for this Plan

The development and maintenance of the MWPA EMP is driven by legislation and internal policies.

2.2.2 Port Authorities Act 1999

This Plan is required under Part 5, Division 1, s.51(1)(b) of the *Port Authorities Act 1999*:

'Section 51. Matters to be included in strategic development plan

(1) A strategic development plan must set out —

- (a) the Port Authority's medium to long term objectives (including economic and financial objectives) and operational targets and how those objectives and targets will be achieved; and*
- (b) an **environmental management plan** for the Port.'*

The present statutory framework requires that Port Authorities submit an EMP annually along with its **SOE** and a **SCI** for approval by the Minister for Transport. The SOE meets the intent of the strategic development plan required under the Port Authorities Act.

The purpose of the EMP, as set out in MWPA SCI, is to:

- describe the role and responsibility of the Port Authority;
- identify the environmental risks associated with the Port activities;
- provide how best these risks can be 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; and
- provide an overview of how the EMP facilitates or ensures compliance and meets requirements under the *Environment Protection Act 1986*.

This EMP will be supported by an Annual Environmental Management Program that provides further detail on the environmental objectives, targets and key projects in alignment with the SCI.

2.3 OBJECTIVE OF THIS PLAN

The objective of this Plan is to meet the intent of the ISO14001 standard by capturing the Port's:

- significant environmental **aspects** (refer Section 6.1.1);
- **performance goals and objectives** for Environmental Management and Sustainability (refer Section 6.1.2); and
- **processes** for ensuring the goals and objectives will be met.

3 Organisational Context

MWPA purpose is *'to be 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 *Port Authorities Act 1999* and operate as corporatised entities, each with a board of directors that reports to the Minister for Transport.

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 business objectives with sustainability principles and integrating management actions into its business processes via the IMS. (Refer to Section 6. Planning.)

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 Staff Members and/or Contractors;
- Regulators and Government agencies;
- Certification Bodies; and
- Stakeholders.

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

In addition to the above information please refer to the **IMS Plan** for 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 Plan applies to all MWPA staff members and contractors, 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 Port Services Agreements (PSAs) 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 Environmental Licence. This EMP serves as an important reference to these interested parties in understanding MWPA compliance obligations.

3.3.1 Exclusions

Activities and services within the FBH and leased areas, that MWPA does not have direct operational control over, are not included in 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 SYSTEMS

MWPA operates under an Integrated Management System (IMS) certified to three international standards. The IMS is described within MWPA **Integrated Management System Plan and Policy Manual**, to be referred to within this Plan as the '**IMS Plan**'.

To maintain ISO14001 Certification the EMP explains how:

- environmental aspects are managed (Section 6.1 and 6.2);
- compliance obligations are fulfilled (Section 6.1 and 9.1.1); and
- risk and opportunities are identified and addressed (Section 6.1 and 9.3).

The IMS Plan describes how business processes common across all functions and activities are implemented maintained and continually improved.

IMS Overview

The IMS is designed to provide a structure of management that complies with recognised international standards and Australian and Western Australian legislative Acts and Regulations.

The IMS is a 'Business Management Tool' with documented processes and procedures that reflect how MWPA manages its business in compliance with the following international and Australian recognised standards.

- ISO 9001:2015 Quality Management System
- ISO 45001 Work Health and Safety Management System
- ISO 14001:2015 Environmental Management System

The IMS is designed and constructed to integrate all elements of the above standards and thus forms the basis of certification.

All plans, procedures and other controlled documents that pertain to environmental management activities will be referenced within this EMP. The IMS describes how MWPA provides leadership and fulfils its management commitments to achieving its objectives, goals and targets.

4 Leadership

4.1 LEADERSHIP AND COMMITMENT

MWPA policies are available to the general public, demonstrating MWPA commitment to the work health and safety of its staff members and contractors, the protection of its environment and quality objectives.

MWPA promotes a strong culture of work health and safety in its day-to-day operations and promotes initiatives to conserve its resources and protect the environment.

The IMS Plan and Policy Manual outlines the principles by which MWPA delivers services to its customers while achieving commitments and meeting stakeholder expectations.

Please refer to the **IMS Plan and Policy Manual**.

4.2 ENVIRONMENTAL POLICY

MWPA has adopted an environmental policy which sets out the organisation's commitment to minimising environmental impacts associated with the Port's operations.

This Environmental Policy commits MWPA to:

- planning and outcome-based decision making that is underpinned by environmental management and sustainability principles that:
 - increase organisational understanding of best practices and environmental performance; minimise resource use;
 - eliminate waste and emissions;
 - improve social amenities;
 - minimises the impact to the environment; 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;
- complying with all applicable environmental legislation and regulations, 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 policy is reviewed every two years and requires approval by the Board at that time. A copy of the reviewed policy is published on MWPA intranet and internet sites.

MWPA *Environmental Policy* is reviewed periodically by the Executive and Leadership Teams. As part of *Management Review* cycles policies are updated to ensure their effectiveness and consistency with legislation and the quality of MWPA services as delivered to its customers while meeting interested parties' expectations for environmental management.

4.3 SUSTAINABILITY STRATEGY

MWPA is embedding sustainability into business planning with an established framework aligned to the United Nations Sustainable Development Goals (2015). Out of the 18 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.

In 2022, MWPA further developed its sustainability framework around three pillars: 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 being established across the business and intended to be reported annually in the MWPA Annual Report.

Figure 5: United Nations Sustainable Development Goals relevant to MWPA

SUSTAINABLE DEVELOPMENT GOALS





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 2022

4.4 ROLES, RESPONSIBILITIES AND AUTHORITIES

The IMS Plan provides specific details on roles and responsibilities within the MWPA organisational structure. MWPA has three distinct levels of management being:

- *Board of Directors*
- *Executive Team* – Comprising of the CEO, General Managers and General Counsel.
- *Leadership Team* – Comprising of Functional Managers and Specialists and Executive Officer.

Environmental Management specific roles within the IMS are described here.

4.4.1 Board

MWPA is governed by a Board comprising a Chair, Deputy Chair and four Directors, all appointed by the Minister. The Board of a Port Authority is its governing body and is charged with performing the functions, determine the policies and control the affairs of the Port Authority.

The Board reviews the organisations performance via a series of subcommittees:

- *Governance, People and Culture;*
- *Strategy and Risk; and*
- *Finance and Audit.*

4.4.2 Chief Executive Officer (CEO)

MWPA CEO provides the necessary leadership and direction to the Port Authority, including shaping the values and principles by which it operates.

4.4.3 General Manager Sustainability, Culture and People

Reporting directly to the CEO, the GM Sustainability, People and Culture 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.

Accountabilities

- Leadership
- Governance
- Human Resources
- Health and Safety
- Environment and Sustainability
- Quality
- Communications
- Community Engagement
- Compliance

4.4.4 Environment and Sustainability Manager

Reporting to the GM Sustainability, Culture and People, the Environment and Sustainability 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 and Sustainability 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; delivering continual value to MWPA stakeholders.

Accountabilities

- Environmental Management
- Maintaining the Environmental Licence to Operate
- Compliance with Obligations
- Regulatory Environmental Approvals
- Sustainable Development
- Stakeholder Engagement
- Continuous Improvement Programs

4.4.5 Leadership and Supervisory Staff

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.

4.4.6 Environment and Sustainability Team

The Environment and Sustainability Team reporting to the Environment and Sustainability Manager, consists of a Monitoring Technician and Environmental Advisors. The Environment and Sustainability Team provides tactical day-to-day advice on environmental matters, implements monitoring programs and executes compliance obligation and reporting requirements.

Accountabilities

- Communication and Awareness
- Environmental Monitoring and Performance Reporting Services
- Data Management and Trend Analysis
- Advice and Guidance on Environmental Aspects
- Auditing and Inspections
- Equipment Maintenance and Calibration
- Incident Reporting and Investigation

4.4.7 Integrated Management System Coordinator

Reporting to the GM Sustainability, Culture and People, 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 staff.

The position works with the Environment and Sustainability 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.

4.4.8 Staff Members and Contractors

Staff members and contractors 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.

5 Planning

5.1 ADDRESSING RISKS AND OPPORTUNITIES

MWPA Risk Management Procedure outlines the process of managing risks within MWPA operations and activities. The 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 captures all its activities, products and services as part of its risk management process. The *CAMMS Risk* module houses a series of risk registers.

- **Corporate** – Being the ‘significant risks’ and/or opportunities, for the business to achieve strategic goals.
- **Functional** – 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 associated with the operation of the business. A risk rating is applied pre and post implementation of control measures to identify the significant risks to the business within CAMMS Risk. The risk registers within CAMMS Risk facilitate formal review by senior managers, at least quarterly, to ensure the information remains current. This review includes evaluating the effectiveness of existing controls and allocating risk treatment actions to improve performance.

Additional project specific impact assessments are captured within Excel workbooks, as project records, and only significant risks are transferred to the CAMMS Project and CAMMS Risk modules.

Significant risks are defined as a risk rated as 15 or higher in accordance with the *MWPA Corporate Risk and Opportunity Risk Matrix (A148044)*.

5.1.1 Environmental Aspects

Environmental aspects are those products, services and activities or emission sources that directly interact or could interact with the environment. Significant aspects are determined by the organisation via environmental impact studies and project risk assessments and management review processes.

Environmental impacts are changes or effects, both adverse or beneficial, that could or have resulted from MWPA activities, emissions and discharges. 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 'High'. 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 subjected to rigorous assessment and referral for regulatory approval as per Section 6.1.3 Planning Actions.

Table 2 – MWPA Environmental Aspect and Potential Impacts

Environmental Risk Assessment Summary – Geraldton Port – Handling of Bulk Mineral Products								
Source – Pathway – Receptor Analysis					Management Measures			MWPA
Potential Emissions	Activity / Sources (Aspect)	Potential Receptors	Potential Pathways	Potential Impacts	Mitigation Measures / Controls	Compliance Assurance Programs	Performance Monitoring Programs	Risk Rating
Air, emissions – Particulates (dust)	Truck and Rail In-loading or Out-loading	Residential		Impacts to human health through inhalation of particulates.	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 and Port Services agreements. Inspections by relevant MWPA supervisor (Rail, Operations). MWPA inspections of Leases.	Real Time Air Quality Monitors (TEOMs and BAM) measuring PM ₁₀ as a 5-minute average.	HIGH – 16 [CAMMS Risk Code: OR10054, OR10057]
	Stockpiling of bulk materials (including within storage sheds).	Light Industry	Air / wind dispersion	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. Sprays and misters used for dust suppression of stockpiles, conveyors and shiploaders. Shielding stockpiles from prevailing winds with fencing.	Routine maintenance inspection of MWPA unloading facilities. Compliance audits against Environmental Licence conditions and Lease Agreements.	Dust Deposition Gauges collecting monthly data within the Fishing Boat Harbour.	
		Fishing Boat Harbour Geraldton Inner Harbour Marine Environment	Dust settling on infrastructure or in marine environment. Resuspension of particulates in high wind conditions and severe weather.	Impacts to amenity at nearby sensitive receptors resulting in nuisance dust – visual dust emissions, dust deposition on private property, public roads users and complaints. Introduction of suspended solids, nutrients or soluble metals to the marine environment.		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.	Background air quality reference site at Bluff Point. Monitoring data compared to DWER target levels, regulatory nuisance dust and World Health Organisation guidelines. Complaints Management.	
	Transfer points within the bulk handling facility, shiploaders and other supporting equipment (including hoppers and emissions from vessel hold).	Foreshore / Recreational Areas			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, sprays, foam) fitted to transfer points and shiploaders. 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.	Complaints and Incident reporting procedures. Targeted Customer and Berth User Operational Review Meetings.		

Environmental Risk Assessment Summary – Geraldton Port – Handling of Bulk Mineral Products								
Source – Pathway – Receptor Analysis					Management Measures			MWPA
Potential Emissions	Activity / Sources (Aspect)	Potential Receptors	Potential Pathways	Potential Impacts	Mitigation Measures / Controls	Compliance Assurance Programs	Performance Monitoring Programs	Risk Rating
					Waste mineral material collected as part of shipping campaigns are returned to product owners.			
Air, emissions – Particulates (dust)	Unloading (discharging) of bulk materials from Vessels.	As above	As above	As above	Operational and stevedore procedures for unloading bulk granular materials. Detailed operational procedures including PPE to be worn in accordance with SDS requirements. 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	As Above
Air, Emissions – gaseous (SOx, NOx, GHG)	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.	Estimating, modelling and tracking greenhouse gas emissions.	HIGH – 12 [CAMMS Risk Code: CR1035, FR1065, OR10013] Note: Risk not yet fully quantified.
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. New equipment is assessed against environmental noise regulations. Change Management Procedures.	Development based noise assessments. Occupational health noise monitoring. Noise surveys of designated mineral storage areas. MWPA Noise Management Plan.	Noise modelling. Complaints Management.	HIGH – 12 [CAMMS Risk Code: OR10015, CR1035]

Environmental Risk Assessment Summary – Geraldton Port – Handling of Bulk Mineral Products								
Source – Pathway – Receptor Analysis					Management Measures			MWPA
Potential Emissions	Activity / Sources (Aspect)	Potential Receptors	Potential Pathways	Potential Impacts	Mitigation Measures / Controls	Compliance Assurance Programs	Performance Monitoring Programs	Risk Rating
Discharges of Surface or Waste Waters	Shipping operations (De-ballasting, maintenance activities ⁴)	Marine Environment	Spill or water discharged from vessels.	Introduction of marine pests.	Port waste reception facilities and vessel berth applications.	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).	Annual sediment monitoring program. Passive water sampling of marine water quality. DPIRD coordinated State-wide Array Surveillance Program for the detection of marine pests. Project closeout reports.	HIGH – 16 [CAMMS Risk Code: OR10054, OR10063, OR10060, CR1035]
	Equipment Washdown (Material Loading and Unloading)	Geraldton Inner Harbour	Direct spills of pollutants or contaminated stormwater or washdown water.		Temporary and localised increase in suspended solids.			
	Surface water (rainwater) runoff	Sensitive marine environments or biota and benthic habitats including seagrass communities of Champion Bay.	Discharge from drains during rainfall.	Impact to marine water quality and ecotoxicity.	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.			
	Chemical, oil or bulk material spills and uncontrolled discharges	Surface water (storm water)	Seepage of contaminants into and through groundwater systems.	Impacts to marine fauna (for example, sea birds, sea lions and fish species). Localised contamination of marine sediments.	Storage of export products in sheds (except for talc). Road sweeping and vacuum trucks in operation in common use areas.			
	Maintenance activities (including sand blasting and dredging)	Groundwater	Migration of sediments containing potential contaminants.	Contamination of shallow groundwater systems.	Washdown water from handling equipment is captured within kibbles and Humeceptors prior to treatment. Vacuum trucks used to recover contaminated water and sediments for offsite disposal at an approved location or returned to mine sites.			

⁴ Maintenance dredging activities are covered by a separate Environmental Impact Assessments and project specific Dredge Environmental Management and Monitoring Plans, available on MWPA website.

Environmental Risk Assessment Summary – Geraldton Port – Handling of Bulk Mineral Products								
Source – Pathway – Receptor Analysis					Management Measures			MWPA
Potential Emissions	Activity / Sources (Aspect)	Potential Receptors	Potential Pathways	Potential Impacts	Mitigation Measures / Controls	Compliance Assurance Programs	Performance Monitoring Programs	Risk Rating
Discharges to Land	<p>Material Loading and Unloading</p> <p>Hydrocarbon and chemical storage areas</p> <p>Reclamation or historical contamination</p> <p>Waste Management</p>	<p>Soil</p> <p>Groundwater</p> <p>Regional Landfill</p>	<p>Direct spills, stormwater or washdown water released to land.</p> <p>Leaching from stockpiles or storage areas into groundwater.</p> <p>Uncontrolled discharges</p>	<p>Soil Contamination</p> <p>Groundwater Quality</p> <p>Discharge of leachates to marine environment</p> <p>Contribution to Landfill</p>	<p>Contaminated Sites Management Procedure.</p> <p>Shed containment systems including bunding, sealed and or compacted floors.</p> <p>Minimise storage holding times to minimise need to add additional moisture to product.</p> <p>Routine sweeping and recovery of spilled material.</p> <p>Operational procedures to prevent material being trafficked outside of sheds and storage areas.</p> <p>Designated banded chemical storage areas.</p> <p>Hydrocarbon spill kits and spill response procedures.</p> <p>Berths sealed with concrete or bitumen to prevent contamination.</p> <p>Waste Management procedure.</p> <p>Designated waste storage and collection areas.</p>	<p>HSE review of via excavation procedures and permits.</p> <p>Hazard Inspection programs.</p> <p>Development Application guideline and procedures.</p> <p>Pre-and Post-unloading / Berth handover inspections.</p> <p>Detailed Site Investigations and submission of a Contaminated Sites Voluntary Audit Report.</p>	<p>Groundwater monitoring program.</p> <p>Waste tracking and reporting data.</p>	<p>HIGH – 9 [CAMMS Risk Code: OR10010, OR10016, OR10054, OR10058]</p>

5.1.2 Compliance Obligations

The Board and CEO, via the MWPA Environmental Policy, commit the Port to identifying and complying with its obligations. MWPA IMS references compliance to Australian and Western Australian legislation. Identified compliance requirements are captured, monitored and measured within the 'Compliance' module within the business's enterprise resource planning software **CAMMS**.

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 Staff 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.

5.1.2.1 Port Authorities Act 1999

Sections 2.1 and 3.2.2 of this Plan outline MWPA environmental roles and responsibilities under the *Port Authorities Act*. Part 4, Division 1, s.31(2) of the *Port Authorities 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 pertinent to the Port operations.

5.1.2.2 Environmental Protection Act 1986

The *Environmental Protection Act 1986 (EP Act)* is administered by the Department of Water and Environmental Regulation (**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
- Currently MWPA is obligated to implement the following 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*):
- Condition 6 – Public Availability of Environmental Management Programmes and Plans.
 - Commitment 14: *Northern Beaches Stabilisation Programme (NBSP)*; and
 - Commitment 15: *Implementation of the NBSP*.
 - Condition 8 – Town Beach Management
 - Monitor stability of Town Beach consistent with Commitment 14.
 - Consult with the City of Geraldton to manage Town Beach to achieve long-term stability and or nourishment on an as need basis in accordance with Condition 10.
 - Condition 10 – Memorandum of Understanding
 - Implement matters related to environmental management which may be subject of a *Memorandum of Understanding with the City of Greater Geraldton*.

MWPA satisfies its obligations under this Ministerial Statement via annual sand bypassing and beach nourishment activities and reporting to DWER and the City of Greater Geraldton, refer to Section 9: Performance Evaluation.

- Part V: Division 3 of *Environmental Protection Act 1986* – Regulation of emissions and discharges

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 a series of environmental protections regulations designed to control specific emissions and discharges within WA. Refer to Section 14. *References*, of this Plan.

Section 6.1.1 *Environmental Aspects* describes MWPA potential emissions and discharges and the Ports environmental management controls, performance monitoring and reporting programs.

5.1.2.3 Contaminated Sites Act 2003

The *Contaminated Sites Act 2003 (CS Act)* sets out the obligations for landowners, occupiers and persons who may have caused or identified contamination to report known or suspected contaminated sites to DWER. DWER, in consultation with the Department of Health, is responsible for formally classifying and recording contamination and providing direction to landowners to manage and or remediate identified sites.

MWPA has received formal notification that the following Lots have been classified under the CS Act.

MWPA Lots reported and classified as 'Possibly Contaminated':

- Lot 300 on Deposited Plan (DMO) 11953 Port Way, West End, Geraldton (classified in 2021);
- Lot 2881 DMO 187994 Augustus St, West End, Geraldton (classified in 2021); and
- Lot 1723 DMO 208543 Shenton St, West End, Geraldton (classified in 2019).

MWPA Lots classified as 'Remediated for Restricted Use':

- Lot 1218 DMO 11508 Augustus St, West End, Geraldton (classified in 2018).

DWER provides a series of guidelines that incorporate key components and or refers to the *National Environment Protection Assessment of Site Contamination) Measure 1999*, which MWPA has used to shape its procedures and plans for land management.

MWPA manages the potential impacts of contaminated land through its *Development Application and Permit 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.

5.1.2.4 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](#))

Is the 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; and
- 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; and
- Non-commercial vessel baggage.

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

5.1.2.5 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 6.1.1 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 2015](#) specifying best practice approaches to applying, maintaining, removing, and disposing of anti-fouling coatings.

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](#).

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](#) 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.

5.1.2.6 Western Australia State Government Policies and Initiatives

As a Government Trading Entity (GTE), MWPA is obligated to align with the Western Australian State Government policies and practices including but not limited to the:

- **Western Australian Climate Change Policy (2020)**

The policy commits GTE's to developing an emissions reduction strategy designed to adapt to climate change and to work towards achieving net zero greenhouse gas emissions by 2050;

- **Waste Avoidance and Resource Recovery Act 2007 (WARR Act)**

The WARR Act established the *WA Waste Authority* to provide advice to the *Minister for Environment* and develop the *WA Waste Avoidance and Resource Recovery Strategy 2030*. Government agencies were consulted as part of the development of the *WA Waste Avoidance and Resource Recovery Strategy [Action Plan](#)* and as such the Port is encouraged as a GTE to:

- implement sustainable procurement policies and guidance that encourage greater use of recycled products and support local market development;
- support recycling and 'Containers for Change' initiatives (for example, container deposit scheme);
- identify and facilitate waste avoidance and recovery initiatives; and
- improve waste data collection.

MWPA incorporates these initiatives into its compliance obligations and implements such programs via its SCI, AEMP and Sustainability Strategy.

5.1.3 Planning Actions

MWPA *Business Planning and Management Review* cycles inform and shape the organisation's plans at various levels throughout the business. 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 7 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.

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

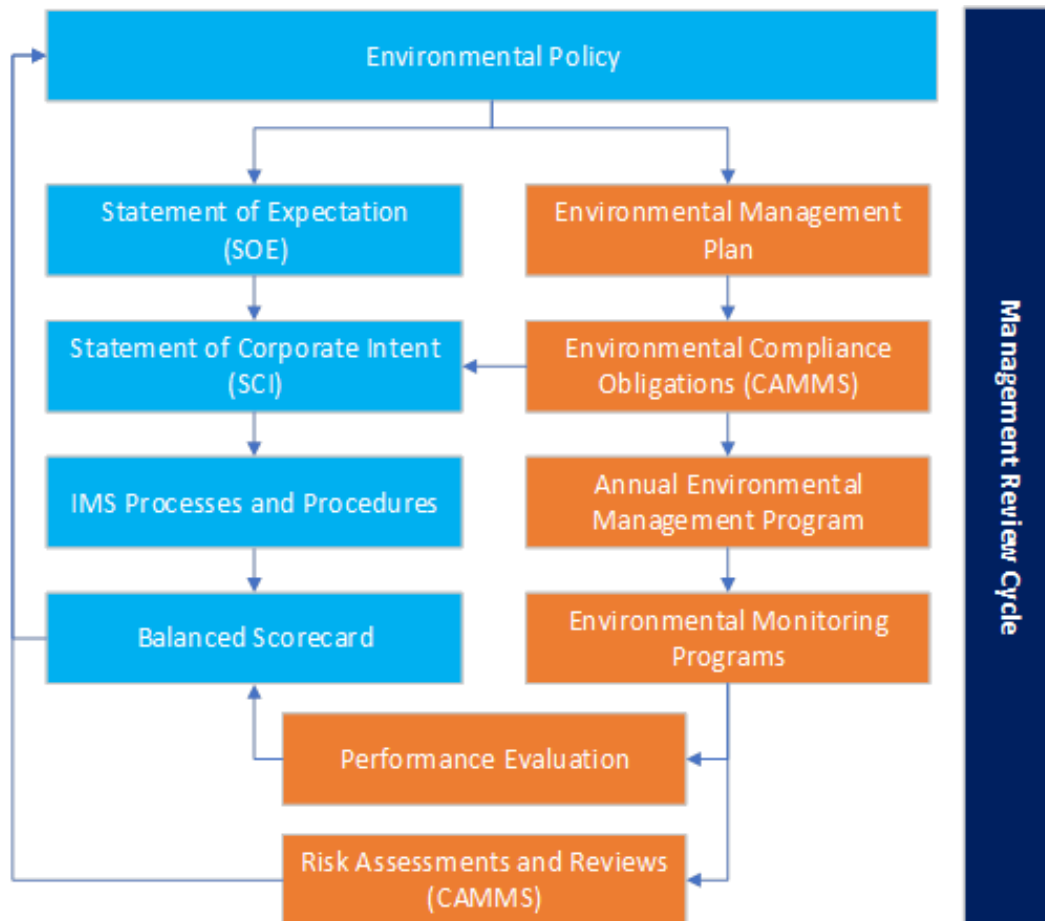
MWPA is first and foremost focussed on meeting the needs of its customers along with fulfilling all regulatory obligations. MWPA undertakes strategic planning activities including the development of a Port Master Plan and a Strategic Development Plan with a 15 to 30 year focus on growth and trade. These 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 Strategy will be implemented through the development of business wide objectives and targets.

As defined within its strategy documents and supported by its policies, MWPA strives to meet the following Strategic Objectives.

- To facilitate, protect and grow efficient trade and tourism.
- Provide infrastructure that enables customers’ supply chains.
- Operate as exemplary corporate citizens.

Figure 7 – 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 strategy and environmental management actions. The SOE meets the intent a strategic development plan as required under the Port Authorities Act.

The 2023-2028 SOE establishes the following Strategic Objectives and goals which are relevant to this EMP and based on MWPA sustainability framework pillars.

Strategic Objectives	Goals
Objective 1 – Prosperity Build Long-term resilience of MWPA and Enhance Economic Prosperity for the Region and the State	Provide Long Term Landside Infrastructure Provide Long Term Marine Infrastructure Provide Long Term Land Management Provide Long Term Digital Infrastructure
Objective 2 – People Invest in an Engage with the Community and our People Leaving a Positive Legacy for Future Generations	Provide a Safe Workplace Operate in Harmony with our Stakeholders Operate in Good Governance
Objective 3 – Planet Operate in Balance with our Environment and Ensure Ecological Values are Protected	Be an Environmentally Sustainable Port

Statement of Corporate Intent (SCI)

On an annual basis, the SCI identifies business priorities and metrics to achieve the strategic objectives and goals as identified by the SOE. The environmental and sustainability objectives and goals are informed through the development of an annual environmental program of works.

Annual Environmental Management Program (AEMP)

The AEMP will be developed in August / September each year to inform the budget cycle and resource strategy for the following financial year. The AEMP 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.

From 2022 the AEMP will be submitted to the Minister for Ports along with the SCI and SOE to satisfy the requirements of *Part 5, Division 1, s.51(1)(b) of the Port Authorities Act 1999*.

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.

The 2023/2024 Environment and Sustainability deliverables include:

- establishing a Net Zero Plan for Greenhouse Gas Emissions;
- completing an annual sustainability benchmarking assessment (partnering with GRESB);
- developing a Business Case for Establishing a Waste Water Treatment Solution;
- developing a Business Case for Climate Change Coastal Protection at the FBH;
- submitting environmental approvals to facilitate infrastructure development and the PMAx project; and
- reducing the number of reportable environmental incidents.

5.2 ENVIRONMENTAL OBJECTIVES AND MANAGEMENT ACTIONS

MWPA sets strategic environmental and sustainability performance objectives and goals within its Environmental Policy and SOE. The SOE and Scorecard identify specific deliverables and targets to improve environmental performance and facilitate business growth and development.

MWPA aligns its operational environment objectives 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
- Land
- Water
- Air
- People

Overarching operational objectives, monitoring and management actions for 2022 to 2024 are presented in = **Table 3 – Environmental Factors and Objectives Relevant to MWPA Operations.**

Table 3 – Environmental Factors Relevant to MWPA Operations

Theme	Factors and Protection Values	Objective	Monitoring and Management Actions – In Place or Completed	Monitoring and Management Action – Planned
SEA	Benthic communities and habitats <ul style="list-style-type: none"> Habitats of Champion Bay; and Port waters. 	To protect benthic communities and habitats so that biological diversity and ecological integrity are maintained.	<p>MWPA currently assesses marine water quality and biosecurity risks via the following key programs:</p> <ul style="list-style-type: none"> Passive Water Quality Monitoring, Marine Sediment Monitoring and Marine Pest Surveillance Monitoring Program (known as SWASP coordinated by DPIRD). <p>In 2020, MWPA commissioned a Benthic Habitat Mapping exercise and Seagrass Health surveys that describes the marine habitats and seagrass health within Champion Bay, Port Grey, Geelvink Channel and Oakajee. MWPA plan to maintain these data sets via targeted benthic habitat surveys associated with marine construction and/or dredging projects.</p> <p>In 2021, MWPA completed maintenance dredging of its commercial harbour and main shipping channel to return these assets to design depth. This program used a Nearshore Dredge Material Placement Area, off the coast of Bluff Point, designed to reintroduce and supplement sediment supply to the beaches north of the Port.</p>	<p>Post dredge environmental monitoring completed in 2022 demonstrates that no negative environmental impact was sustained as part of the dredge program. The outcomes of the post dredge monitoring will be finalised and made available to stakeholders in 2023.</p> <p>MWPA continues to fulfil its obligations under the Northern Beaches Stabilisation Programme required under Ministerial Statement 600. Learnings from recent coastal studies and sediment modelling are being incorporated into a Sustainable Sediment Management Plan, which is being developed in 2022/2023.</p> <p>MWPA is currently compiling a Coastal Hazard Assessment and Risk Management Plan to address the infrastructure risks associated with sea level rise and climate change.</p> <p>In 2022 MWPA commissioned the development of a whole of Port waters <i>Marine Environmental Management and Monitoring Framework (MEMMF)</i> that will review and recommend ongoing long-term monitoring programs for assessing marine environmental health.</p>
	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; and Adapt to sea level rise as a result of climate change.		
	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.		
	Marine Fauna <ul style="list-style-type: none"> Biosecurity Including Sea birds and Sea Lions 	Operate in balance with marine fauna so that biological diversity and ecological integrity are maintained.		
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.	<p>In 2020, MWPA reported four lots, owned by MWPA, within the West End of Geraldton as Possibly Contaminated.</p> <p>In 2021, MWPA submitted an independently assessed Voluntary Audit Report to the Contaminated Sites Branch of DWER. DWER has classified three lots as ‘possibly contaminated – investigation required’.</p> <p>In 2021, MWPA released Development Guidelines that include guidance on developments including landscaping, drainage and stormwater management, waste management, lighting sustainability and environmental management.</p>	<p>In 2023, MWPA plans to review its Contaminated Site Management Procedure to address the recommendations of the VAR and associated Detailed Site Investigations.</p> <p>MWPA is developing the detailed design to support the implementation of its Port Master Plan. Key environmental impact assessments will be undertaken as part of developing scopes of work and seeking regulatory approvals including noise and dust modelling. Management and monitoring plans will be reviewed to support the increase and diversity of new trade.</p>
	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).		
	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.		
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.	MWPA maintains a Water Efficiency Management Plan with a water use target of 0.0042kL/tonne exported through the port. In 2020/21 MWPA reported a 6% reduction in water use compared to the previous reporting period but is currently using 0.0046kL/tonne.	MWPA has commissioned a Wastewater Management review seeking to find a long term solution to treat and potentially reuse industrial wastewater to continually improve the water quality and reduce water use within the Bulk Handling Facilities. A business case has been developed and pending approval, construction will be undertaken in 2023/24.
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.	<p>MWPA assesses air quality via the following monitoring methods, comparing results to World Health Guidelines and regulatory targets and limits:</p> <ul style="list-style-type: none"> High Volume Air Samplers and Dust Deposition Gauges; and Continuous PM₁₀ particulate monitoring network. <p>In 2021, MWPA commissioned the development of a 3D model of the site and infrastructure combined with wind modelling to identify those areas of the Port precinct that influence wind patterns and potentially promote fugitive dust emissions. A Dust Management Plan was developed and implemented in 2022 for all Port users.</p> <p>In 2022, MWPA established detailed inventories of electricity and fuel consumption, along with greenhouse emissions estimates.</p>	<p>A cumulative dust dispersion modelling study was initiated for the whole-of-port in 2022, including proposed dust mitigation measures to improve air quality with increasing Port throughput. A number of dust improvement actions were also initiated in 2022 including design and construction of a Wind Tamer fence on Marine Terrace, install of a dry fogging unit in the iron-ore conveyor circuit and a cascade chute on the Berth 4 shiploader.</p> <p>Further dust mitigation actions are planned for 2023 to continually improve air quality associated with Port activities.</p> <p>The development of a greenhouse emission reduction plan commenced in 2022, with the aim to achieve net zero emissions by 2050. It is expected this plan will be completed by 2023, upon which implementation will commence.</p>
	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.		

Theme	Factors and Protection Values	Objective	Monitoring and Management Actions – In Place or Completed	Monitoring and Management Action – Planned
PEOPLE	Social surroundings • <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.	MWPA continues to use its stakeholder consultation committees to provide and receive feedback on issues and concerns. These forums are a key method of informing interested parties of the changes, projects and initiatives that MWPA is championing to facilitate trade and tourism while operating in harmony with our stakeholders.	
	Human Health • <i>Community of Geraldton</i>	To protect human health from significant harm.		
	Cultural Heritage	Advocating for the environment, community and traditional landowners (Past and Present).		

6 Support

6.1 RESOURCES

MWPA provides the necessary resources for the realisation of the IMS goals, functions, and management measures.

All personnel and contractors employed at the Port have a role to play within MWPA integrated management system and the environmental requirements described within it. All Port users have a general duty under the Western Australian *Environmental Protection Act 1996* to: *'not cause or allow any serious environmental harm; or intentionally or otherwise, cause pollution or unreasonable emissions from any premises.'*

Funding for minor and major capital items and to implement specific environmental initiatives is determined as an outcome of MWPA's aspects and impacts assessments, through strategic development planning and adoption of annual environmental goals and objectives.

6.2 COMPETENCE

MWPA recruitment processes ensures personnel employed for key environmental management roles are suitably qualified. MWPA invests in ongoing training and development of its staff.

An online modular induction package includes environmental aspects has been developed and is mandatory for all persons working on MWPA controlled land. The training is valid for three years at which time a refresher induction must be completed.

A range of environmental information and requirements are summarised within the *Staff Member and Contractor Handbook* published on the MWPA website.

6.3 AWARENESS

Through regular information mediums, such as email bulletins, CEO Updates, Team Meetings and the like, MWPA ensures that its Staff Members and Contractors are familiar with MWPA Policies and Objectives and that they are aware of their contribution to the improvement of the IMS.

In order to increase awareness of Work Health and Safety, Environmental, and Quality matters, specific modes of communication and instructions are utilised with Staff Members and Contractors. As detailed in the IMS Plan, *'Consultation and Participation'* with MWPA Staff Members and Contractors occurs within the business through Team Meetings, Committee Meetings, Toolbox Meetings and Prestart / Handover Meetings. All Staff Members and Contractors receive communication on varied subjects via the *'CEO Weekly News'* email and other updates by the CEO.

The MWPA Business Improvement Program promotes the generation of continuous improvement ideas and active collaboration between Staff Members and Contractors in the improvement of quality, performance and conformance with obligations.

6.4 COMMUNICATION

MWPA IMS Plan provides an overview of the key communication principles that MWPA uses to communicate and engage with Staff Members, Contractors, Customers and other relevant Stakeholders.

6.4.1 Internal Communication

The inclusion of all MWPA Staff Members and Contractors through regular information and communication is an important component of the IMS. Internal communication forums include:

- Committee and Board Meetings
- Chief Executive Officer Updates
- Team Meetings
- Intranet News/Updates
- Special General Meetings, Presentations and the like
- Staff Member consultations
- Change Management – Implementation and Communication Plans

6.4.2 External Communication

Quarterly and annual environmental reports are presented to leaseholders, berth users and government agencies (including DWER). Port stakeholder meetings are facilitated by MWPA throughout the year where environmental incidents, management and best practice initiatives are discussed with Port users.

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 DOCUMENTED INFORMATION

6.5.1 General

Documented information associated with environmental management is compiled and controlled within MWPA Electronic Document Records Management System, being **Objective**. IMS Controlled Documents are displayed internally within the '**Document Centre**' page on MWPA's Intranet.

MWPA IFS Software is MWPA Finance, Contract and Asset Management tool. Any contractual, commercial or asset related information is held within or linked to this software.

6.5.2 Document Management

MWPA **Document Management Procedure**, defines the process for the development, consultation, approval, distribution, review, amendment and retirement of all Controlled Documents that support MWPA key business processes and operations.

Refer to the IMS Plan for further information on the control and management of information and documents.

6.5.3 Records

The control of MWPA additional Documents (its *Records*) are managed in accordance with the **Recordkeeping Plan** and **Records Management Procedure**.

The **Retention and Disposal of Digital Records Guide** provides MWPA Staff Members and Contractors with a guide and overview on how the Retention and Disposal process occurs within Objective

All environmental management records are held within the Objective Folder [Environmental Management \(fA182753\)](#) or within project specific folders.

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 Staff Member and Contractor 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 6.1.1 Environmental Aspects* describes how those operational activities and potential emissions sources are identified. *Table 2: MWPA Environmental Aspect and Potential Impacts* outlines the operational mitigation measures and controls implemented to prevent significant impacts. *Table 4 Bulk Granular Products* describes the approval parameters for receiving and handling bulk products.

The bulk granular products currently approved for import or export through Geraldton Port are outlined in **Table 4**.

Table 4 – Bulk Granular Products

Product Type	Product	Description	Moisture Content	Transport Mode	Storage	Handling Method/s
Export						
Unmodified Raw Materials	Sands	Fine sands, ranging between 0.075-2.36mm diameter	<1%	Truck	Enclosed storage sheds	Bulk via Berths 5 and 4
Physically Treated Raw Materials – Metal Ores	Iron Ore	Includes Fines products < 8 mm diameter Lumps: 6-32mm Pellets: 8-16mm	Fines: <4% Lump: <3% Pellets: <3%	Rail & Truck	Enclosed sheds with dust extraction	Bulk via Berth 7 and Berth 5
	Manganese Ore	Fines product ranging 1-7mm diameter Lump product -36mm	Fines: >= 4.9% Lumps: ND	Truck	Enclosed sheds with dust extraction Rotainer Storage Area	Bulk via Berth 5 Rotainers via Berth 6
Physically Treated Raw Materials – Non-Metallic Minerals	Heavy Mineral Concentrate	Dry, fine product, 0.45mm diameter or less	3- 5%	Truck	Enclosed storage sheds	Bulk via Berth 4
	Zircon (Inc. Zircon in Concentrate)	Dry, fine product, 0.45mm diameter or less	Zircon: <1% Zircon Cons: 6%	Truck	Enclosed storage sheds	Bulk via Berth 4
	Ilmenite	0.45mm diameter or less	<1%	Truck	Enclosed storage sheds	Bulk via Berth 4
	Rutile	0.45mm diameter or less	<1%	Truck	Enclosed storage sheds	Bulk via Berth 4
	Garnet	0.45mm diameter or less	<1%	Truck	Enclosed storage sheds Bagged	Bulk via Berth 4 Bagged via Berth 6
	Synthetic Rutile	0.45mm diameter or less	<1%	Truck	Enclosed storage sheds	Bulk via Berth 4
	Talc	Aggregate product, typically 60mm diameter or less	<1%	Truck	Stockpile Storage Area	Bulk via Berth 4
	Mineral Sands Concentrate (Monazite)	0.45mm diameter or less	3-8.5%	Truck	No storage on site	Rotainers via Berth 6
Chemically Treated Material – Metal Concentrates	Lead Sulphide Concentrate (Heavy Precious Metals)	Fine product, 0.037-0.15mm	6-10%	Truck	Enclosed Sheds with dust extraction (bulk) Rotainer Storage Area	Bulk via Berth 4 Rotainers via Berth 6
	Copper Concentrate	Fine product, 0.037-0.15mm diameter	9-10%	Truck	Enclosed Sheds with dust extraction (bulk) Rotainer Storage Area	Bulk via Berth 4 Rotainers via Berth 6
	Zinc Concentrate	Fine product, 0.053- 0.15 mm	9-10%	Truck	Enclosed Sheds with dust extraction Rotainer Storage Area	Bulk via Berth 4 Rotainers via Berth 6
	Nickel Concentrate	Fine product, 0.037-0.15mm diameter	9-11%	Truck	Rotainer Storage Area	Rotainers via Berth 6
	Iron Concentrate	Fine product, 0.05mm diameter or less	12-17%	Truck	No Storage on site	Rotainers via Berth 6
Import						
Manufactured Products	Fertilisers Inc. Urea, Soda Ash, Pot Ash, Phosphates (DAP, MAP, MOP)	Granulated products, ranging from 0.03-20mm	<1%	Truck	No storage on site	Discharge via Berth 6 and Berth 2 using hoppers and grabs
Physically Treated Raw Materials	Coal	Fine product, <18mm diameter	16%	Truck	No storage on site	Discharge via Berth 6 using electric grabs and hoppers
	Heavy Mineral Concentrate	Dry, fine product, 0.45mm diameter or less	3-5%	Truck	No Storage on site	Discharge via Berth 6 using Hoppers and self-discharging vessels (auger/ conveyor system)

7.2 EMERGENCY PREPAREDNESS AND RESPONSE

MWPA **Emergency Response Plan** (A1029434) 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 Midwest 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.

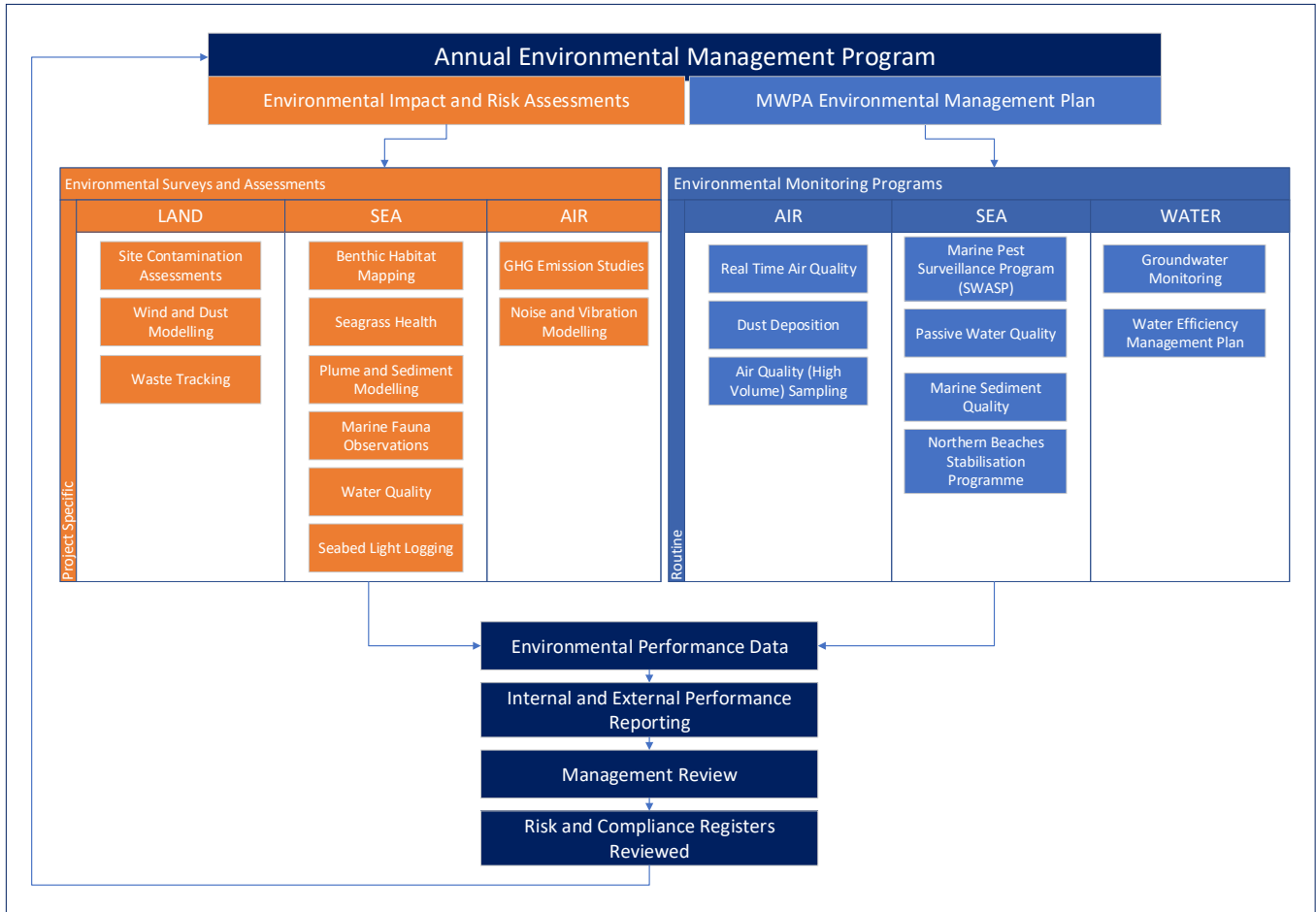
8 Performance Evaluation

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 8 – MWPA Environmental Monitoring and Performance Evaluation



8.1.1 Evaluation of Compliance

The Environment and Sustainability Team are responsible for routinely assessing compliance with regulatory commitments for environmental management as per the Environmental Licence, Acts and Regulations. This is achieved on a day-to-day basis via site inspections, review of monitoring data and the response to reported hazards, complaints, and incidents. A Quarterly Air Quality Report is submitted to DWER, evaluating the effectiveness of MWPA management measures.

Environmental performance data is presented to senior management on a regular basis for review. Data from monitoring programs assist in evaluating the effectiveness of control measures that have been put in place to safeguard the community and environment.

The Executive Leadership Team assess the compliance with SCI and Scorecard metrics on a monthly basis as part of preparing the *Monthly Board Report*.

On an annual basis, a whole of business performance review is facilitated as part of preparing the *Annual Public Report, Ministerial Statement 600 Statement of Compliance, Annual Environmental Report and Annual Audit Compliance Report (AACR)*. These reports are released externally to the public and regulators.

8.2 INTERNAL AUDIT

8.2.1 Internal Audit Programme

MWPA conducts audits via a tiered and risk-based audit program that aligns with the Enterprise Risk Management Framework.

- **Corporate Audits** – Focus on assessing the effectiveness of strategic plans and policies in delivering business goals and objectives.
- **Functional Audits** – Focus on assessing department level progress against performance metrics, budget management, project delivery and implementation of tactical management plans.
- **Operational Audits and Inspections** – Focus on assessing compliance against operational procedures, regulations, licences and agreements.
- **IMS Audits** – Focus on assessing the effectiveness of the management system in delivering all the above in accordance with the ISO Standards.

Internal audits are planned at routine intervals and are scheduled via the CAMMS Audit Register. In accordance with the DWER AACR, MWPA completes an annual audit against all conditions of its environmental licence.

External audits are planned on an as-required basis. The IMS is audited annually by a third-party independent auditor as part of maintaining certification to the ISO and AS Standards.

Noncompliances and opportunities for improvement identified via both internal and external audit programs are logged in the CAMMS Audit register and corrective actions are tracked to completion to ensure the organisation is continually improving.

8.3 MANAGEMENT REVIEW

Performance evaluation data is retained within the CAMMS Suite of registers. CAMMS Compliance is used to track obligations, CAMMS Risk evaluates the effectiveness of controls and CAMMS Audit captures assessments of the effectiveness of business processes.

MWPA Management reviews the effectiveness of the environmental management system in accordance with the *IMS Committee Terms of Reference*. The IMS Committee meets quarterly reviewing MWPA IMS, to ensure its continuing suitability, adequacy, effectiveness and alignment with MWPA strategic direction.

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 AEMP.

9 Improvement

9.1 NONCONFORMITY AND CORRECTIVE ACTION

9.1.1 Incident, Nonconformity and Corrective Action

Incident Reporting and Investigation

MWPA Incident Management process is designed to address nonconformances and drive corrective actions that prevent repeat events and improve the IMS. Reported events are investigated based on the level of potential risk to organisational goals and Health, Safety and Environment (HSE) targets.

The CAMMS Incident Register is structured to assess:

- Event Details;
- Actual and Potential Risk;
- Regulatory Reporting Obligations; and
- Root Causes.

Complaints and Noncompliance

Complaints, Customer and Community feedback received by MWPA are addressed within the *CAMMS Incident Register*. MWPA is committed to promptly replying to respondents and investigating all complaints in a timely fashion.

Noncompliances with obligations are reported to external stakeholders in accordance with incident reporting procedures. *CAMMS Incident* is used to record non-compliances with compliance obligations.

Corrective Actions

MWPA uses CAMMS Software to assign, track and closeout corrective actions.

Refer to the **IMS Plan** for further details.

9.2 CONTINUAL IMPROVEMENT

The Executive Leadership Team is committed to ensuring the effectiveness and continuous improvement of the IMS. MWPA has embarked on a business wide Continuous Improvement Program called **TEAM**. This program seeks to improve business processes, through training, communication and visual management techniques designed to establish a common understanding of the business objectives.

10 Attachments

Document	Title
1	Critical Infrastructure

11 Associated Documents

Document Title
Air Quality Monitoring Sampling and Analysis Plan [A1030106]

Document Title
Contaminated Sites Management Procedure [A1039199]
Corporate Risk and Opportunity Matrix [A148044]
Dust Deposition Sampling and Analysis Plan [A1030155]
Hazardous Substances and Dangerous Goods Procedure [A1038613]
HSE Contractor Management Plan [A1385119]
Integrated Management System Plan and Policy Manual [A1463844]
Loading Metal Concentrate Procedure [A1039206]
Loading Packaged Bulk Minerals Procedure [A1039213]
Managing Dust from Port Operations Work Instruction [A1036990]
Marine Pest Management Procedure [A1039201]
Marine Water Quality Monitoring Procedure [A1032726]
Passive Water Quality Monitoring Sampling and Analysis Plan [A1030024]
Permit to Work Procedure [A1039204]
Policy Number 7: Environment Policy [A1111201]
Sediment Quality Monitoring Sampling and Analysis Plan [A1030068]
Staff Member and Contractor Handbook [A1036953]
Unloading Products Using Hoppers Procedure [A1032581]
Waste Management Procedure [A1039210]
Wildlife Management and Pest Control Guidelines [A1038673]

Location – Mid West Ports Intranet – [Document Centre](#)

12 Records

Document	Title
2022-2027	Statement of Expectations
2022-2023	Statement of Corporate Intent
June 2020	Port Master Plan
L427/1982/15	Environmental Licence
F2019L00765	Biosecurity (First Point of Entry—Port of Geraldton) Determination 2019

Location – Mid West Ports Electronic Document Records Management System, Objective

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 - <https://www.saiglobal.com/online/>

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>	<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>
<i>Biosecurity Act 2015 (Cth)</i>	<i>Division 3 Subsection 229 (1) Determination of ports</i>
<i>Contaminated Sites Act 2003 (WA)</i>	<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</i>

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 and Sustainability Manager
 Document Approver: GM Sustainability, Culture and People
 Approval Date: 24 November 2022
 Document Review Period: 2 yrs

16 Attachment 1 – Critical Infrastructure

