

WORK HEALTH AND SAFETY, AND ENVIRONMENT APPROVALS PROCESS FOR NEW CARGOES

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1 Purpose

The purpose of this Procedure is to provide potential importers or exporters at the Geraldton Port with a detailed guide as to the process required to assess Work Health and Safety, and Environmental (**WHSE**) risks associated with new cargo.

This Procedure should be read in conjunction with the New Cargo Checklist Form. Additional details with respect to commercial agreements will be provided by MWPA's Trade and Commercial Services representative.

2 Scope

This Procedure supports the Mid West Ports Authority (**MWPA**) to perform its functions under the *Port Authority Act 1999* including:

- *facilitate trade within and through the Port and plan for future growth and development of the Port;*
- *be responsible for the safe and efficient operation of the Port; and*
- *protect the environment of the Port and minimise the impact of Port operations on that environment.*

This Procedure ensures MWPA remains compliant with relevant legislation and the conditions of any approval instruments granted under the following.

- *Biosecurity Act 2015*
- *Dangerous Goods Safety Act 2004*
- *Environmental Protection Act 1986*
- *Work Health and Safety Act 2020*

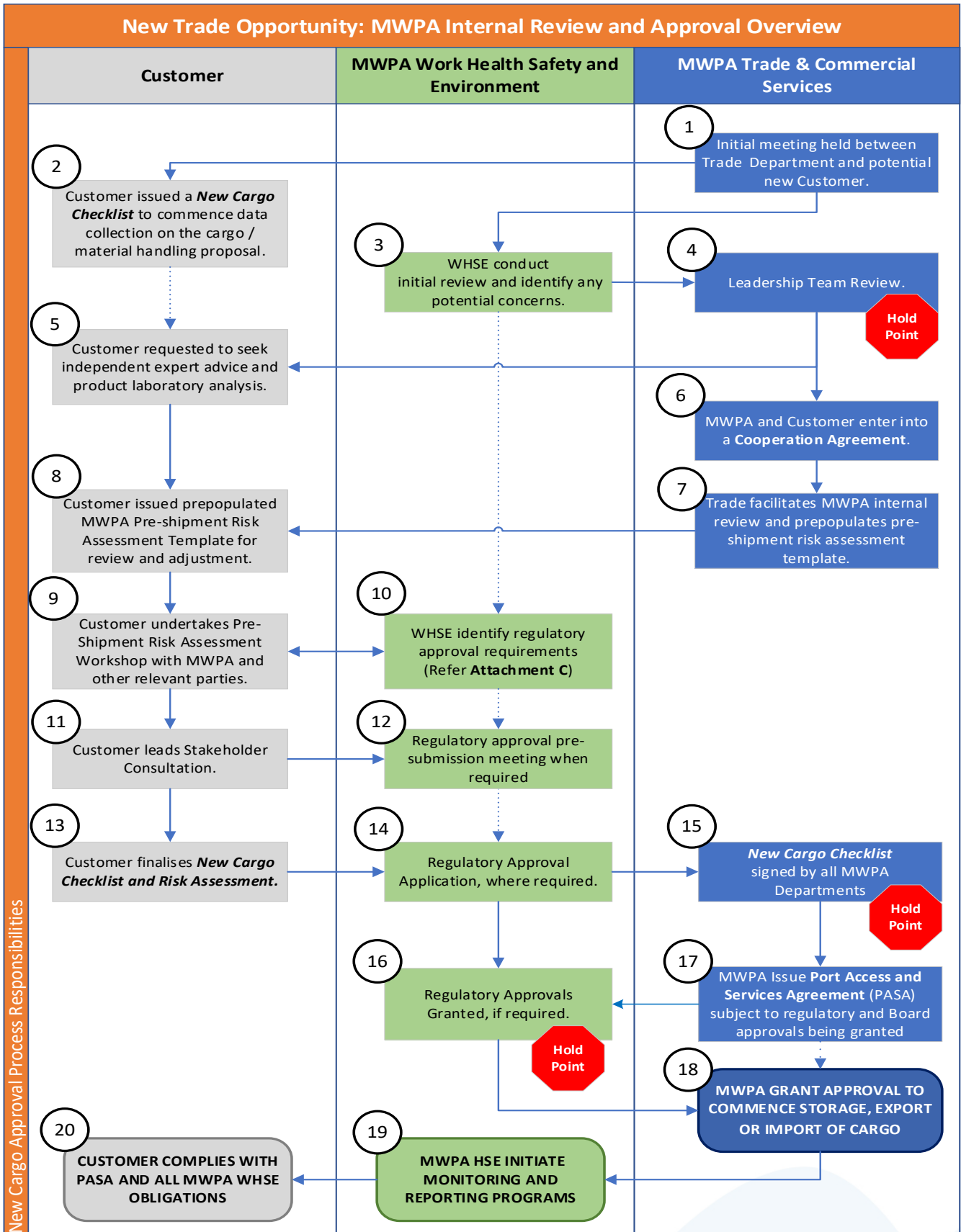
This Procedure is to be applied when assessing all new trade and commercial agreements associated with the import or export of cargo through the Geraldton Port.

3 Roles and Responsibilities

Department / Function	Responsibility
Customer (Project Owner / Proponent)	<ul style="list-style-type: none"> • Provide all information requested within the New Cargo Checklist Form, including product laboratory analysis specified in <i>Table 2 – Recommended Laboratory Analysis</i> and customer product specific Safety Data Sheet (SDS). • Provide a 5kg to 10kg sample of bulk granular products, as advised. • Facilitate pre-shipment approval risk assessment. • Seek expert advice on Ecotoxicity, Public Health or Workforce exposure risks, as required. • Develop a Dust Management Plan for Port operations. • Develop a waste management plan for spillage and wash water, where relevant. • Provide Safety and Environmental Management Plans including a Radiation Management Plan, if applicable. • Provide an Emergency Response Procedure and key company contacts. • Develop a Traffic Management Plan and obtain permits as required. • Undertake stakeholder consultation to support regulatory approvals, as required. • Apply for environmental Works Approvals if relevant. • Review and provide input to regulatory approval submissions.
Trade and Corporate Services	<ul style="list-style-type: none"> • Request the completion of the New Cargo Checklist Form. • Liaise with new Customers to ensure the requirements of this Procedure are met. • Liaise with the Department of Agriculture, Fisheries and Forestry on <i>Biosecurity First Point of Entry Determination</i> matters. • Assist in the coordination of MWPA involvement in the pre-shipment approval risk assessment to ensure all relevant internal stakeholders are consulted and informed. • Ensure commercial agreements are adequate for the control and management of specific WHSE risks. • Ensure the MWPA Board, CEO and Minister for Ports are informed of all new trade opportunities and the outcomes of WHSE risk assessments, as required. • Execute a Port Access and Services Agreement (PASA) and approve the commencement of storage, export or import of new cargos.

Department / Function	Responsibility
Environment	<ul style="list-style-type: none"> • Review product specifications and laboratory data. • Review proposed handling and storage methods. • Advise on environmental approval requirements. • Participate in pre-shipment approval risk assessment. • Review Customer Dust, Waste and Environmental Management Plan. • Compile approval submission documents. • Liaise with the Department of Water and Environmental Regulation with respect to <i>Environmental Licence L4275/1982/15</i>. • Liaise with workforce Health and Safety Representatives and communicate new cargo and customer information to the workforce. • Implement additional environmental monitoring programs as required.
Safety	<ul style="list-style-type: none"> • Review product specifications and laboratory data. • Review proposed handling and storage methods. • Advise on work health and safety requirements. • Advise on dangerous goods licensing requirements. • Participate in pre-shipment approval risk assessment. • Liaise with workforce Health and Safety Representatives and communicate new cargo and customer information to the workforce. • Revise safe work procedure with MWPA Operations. • Revise and implement additional occupational exposure monitoring programs as required.
Operations, Marine and Maintenance	<ul style="list-style-type: none"> • Review product specifications and laboratory data. • Review proposed handling and storage methods. • Advise on operability of proposed handling methods: <ul style="list-style-type: none"> • flowrates; • conveyor and shiploader configuration; • housekeeping and washdown requirements; and • dust extraction and suppression systems. • Participate in pre-shipment approval risk assessment. • Revise and update operating procedures and job safety analysis. • Confirm pre-shipment meeting and pre-shipment form requirements.

4 Process Overview



Refer to flowcharts in **Attachment B** for guidance on WHSE requirements and **Attachment C** for external approvals.

5 WHSE Risk Assessment (Steps 1 to 5)

5.1 INITIAL MEETING

Customers looking to direct a new cargo type through Geraldton Port, shall in the first instance meet with MWPA Trade and Commercial Services.

The purpose of the meeting is to ensure all communication and information regarding the new cargo is channelled through one point of contact at MWPA within the Trade and Commercial Services team. Following the initial meeting, the Trade and Commercial Services representative will consult with all relevant sections of MWPA regarding how the cargo can be accommodated.

Such considerations are:

- what berth would be most appropriate;
- which facilities are available and can provide the requested services;
- will new infrastructure be required to facilitate the trade; and
- aspects that require further risk assessment.

This will also allow the Customer to become familiar with the Port's processes and key staff who will assist with facilitating all aspects of the project from initial enquiry through to product loading.

5.2 NEW CARGO CHECKLIST

To facilitate the assessment of the trade opportunity and potential WHSE risks, Customers are provided with a **New Cargo Checklist**. This form specifies all the information required to enable MWPA to complete its internal due diligence and meet its legal obligations.

The checklist requires details of the proposal and details provided may be used in regulatory approval submissions including how products are processed, transported, stored, and handled between the Customers premises and within the Geraldton Port. Specific details are required on volumes, frequency and timing of shiploading activities.

Cargo specifications are requested to facilitate an assessment of where and how a product might be handled within the Port. Specific types of cargos may require more detailed information such as:

- Bulk Granular Products;
- International Imports; and
- Dangerous Goods.

The Trade and Commercial Services will liaise with the Customer to clarify the required information subject to the details of the proposal.

5.3 WHSE REQUIRED INFORMATION

The New Cargo Checklist is specifically designed to collect information to assist the MWPA in determining if there are any risks to:

- public health and amenity;
- workforce health and safety; and
- the environment (terrestrial, groundwater and marine).

To accurately assess the potential for emissions, discharges or exposure pathways present, detailed laboratory analysis is requested to enable the following risks to be understood.

- Human harm, illness, or disease.
- Property damage or nuisance capability.
- Toxicological and ecotoxicity.
- Physical and operational hazards.

Refer to **Attachment A** for details on laboratory analysis and criteria used by Department of Water and Environmental Regulation (**DWER**) to determine the severity of the above risks. If the product does not meet the Trial Notification criteria (DWER 2018) further detailed analysis or subject matter expert advice may be requested as part of undertaking a WHSE Risk Assessment for the proposed activities.

Whether it is a new cargo requiring external approvals or a cargo currently able to be handled under existing approvals, MWPA will conduct an internal review of all information submitted within the New Cargo Checklist and will advise if there are any areas of concern or if additional information is required.

5.4 SEEKING EXPERT ADVICE

It is recommended that the Customer seeks expert advice to assist in the understanding of the WHSE aspects of their proposal. If regulatory approvals are triggered a consultant with suitable Port operations experience is recommended to assist in risk assessments or review of approval submissions. Suitable subject matter experts may include:

- Toxicologist or Occupational Hygienist;
- Risk Engineer or Dangerous Goods Storage and Handling Assessment Consultant; and
- Commercial Importer or Customs Broker.

Expert advice will be requested when dangerous goods, hazardous materials or highly soluble cargos are proposed for export or import. Such goods can pose an unreasonable risk to health, safety and property during transport or storage. Any proposals involving the transport of dangerous goods by sea, road or rail, or the storage, and handling of dangerous goods within the Port's maritime security boundary will require the Customer to engage an expert to provide advice and assist in the facilitation of risk assessments.

Bulk granular products that have soluble metals or nutrients identified during laboratory testing and are determined to be above ANZECC Default Guideline Values (**DGVs**) will require further information to be provided on the potential toxicity to marine environments and public health.

Products derived from waste materials will also require additional toxicity assessments. MWPA recommends Customers seek an independent assessment from a toxicologist to determine if their product is 'harmful to marine environments' in accordance with the MARPOL Annex V criteria and using ecotoxicity reference values for marine organism based on the criteria in the International Maritime Dangerous Goods Code (IMO2010). These assessments will also assist Customers when developing a Safety Data Sheet for their product.

If toxicity assessments identify a risk to human health, there may also be a requirement to consult the Department of Health to advise on the required personal protective controls, public consultation, and implementation of additional monitoring programs.

Regulatory approvals will be required for such products and independent assessments by suitably qualified consultants will assist in ensuring approvals progress smoothly and in a timely manner.

6 Operational Risk Assessment (Steps 6 to 9)

Once MWPA and the Customer have entered into a Cooperation Agreement, MWPA will work with the Customer to assess operational health and safety risks associated with the transport, storage, loading or unloading of the cargo. MWPA Trade and Commercial Services will prepopulate a Pre-shipment Risk Assessment Template to guide the customer in developing a detailed assessment of all aspects of material handling within the Port of Geraldton.

6.1 PRE-SHIPMENT APPROVAL RISK ASSESSMENT

The Customer is responsible for organising and facilitating a risk assessment in conjunction with MWPA and all involved parties, covering the transport, in-loading, storage, and out-loading of products at the Geraldton Port. The purpose of the risk assessment is to review the operations to understand general WHSE risks such as:

- traffic management;
- operability and materials handling;
- maintenance and asset management;
- noise;
- dust;
- occupational exposures;
- radiation management;
- chemical and fuel management;
- housekeeping and waste management; and
- emergency management and incident response.

It is recommended that the customer completes a site visit to understand the Port operations and key risk areas, prior to arranging the risk assessment.

MWPA Trade and Commercial Services will ensure representation from the MWPA's Production, Marine, Safety, Environment and Maintenance functions are represented at the risk assessment so that physical characteristics of new products, occupational exposures, environmental emissions and logistical aspects of material handling and shipping operations are understood.

Attachment B provides examples of infrastructure related control measures required by MWPA. Specialist information on any WHSE risk identified during the compilation of the New Cargo Checklist can be tabled and discussed during the risk assessment. Any additional monitoring requirements will be identified, and an agreement reached around roles and responsibilities.

At this point, MWPA will also advise what regulatory approvals may be required, such as amendments to the Port's Environmental or Dangerous Goods Licences. For general (break-bulk) cargo, biosecurity controls will be a key focus of the risk assessment (Refer to Approval Decision Trees in **Attachment C**).

7 Regulatory Approvals (STEP 10 & 12)

7.1 DANGEROUS GOODS (DG)

MWPA considers a substance to be a dangerous and/or hazardous cargo if it is listed in the *Australian Dangerous Goods Code (ADG)* and is within any of the hazard classes 1 to 9 or their associated divisions. Consistent with DEMIRS, MWPA also considers sulphur in any form and substances named or described in Schedule 1 of the *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* to be Dangerous Goods (DG).

Part 8A of the *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* specifically deals with DG in Ports which present a risk of explosion. Vessels carrying more than 1,030 tonnes of a Class 5.1 DG, such as ammonium nitrate and calcium hypochlorite, cannot berth unless the berth has been declared a 'Special Berth' by the Chief Dangerous Goods Officer. If the quantity is below this volume, the vessel can enter the Port of Geraldton if the goods are accompanied by the designated ADG and *International Maritime Dangerous Goods (IMDG) Code* documents, demonstrating the goods are **IMDG Code** compliant and are not discharged from the vessel.

When DGs are brought into a port there are certain duties under the regulations that must be met by the Consigner, Berth Operator and Vessel Master, such as:

- berth operator's duties to have an appropriate emergency plan for the berth;
- berth operator's duty to minimise time DG are kept at berth;
- consideration of incompatible operations such as fuel tankering and hot works; and
- safety and security considerations.

These requirements will be assessed by MWPA Marine team as part of the berthing application process.

MWPA holds a *Dangerous Goods Site Licence (DGS021891)* for Class 9 environmentally hazardous substances covering the interim storage of HPM (lead), copper and copper oxide concentrates within the BHF conveyor system. Customers must hold their own DG Licence for bulk storage of metal concentrates associated with any lease they hold within the Port.

MWPA has two Dangerous Goods Pipelines, registered under Division 81 of the *Dangerous Goods Safety Act 2004*. Registration numbers DPL001104 and DPL001105 are for a 150mm Petrol and a 300mm Diesel Fuel import pipeline, both running between BP and Shell Storage terminals through to Berth 5 and 6.

The tankering, bunkering, or bulk liquid transfer of chemicals that are classified as a dangerous good or hazardous substance, must be subject to a detailed risk assessment facilitated by a suitably qualified person to determine if any licenses or registrations are required under the *Dangerous Goods Safety Act 2004*. The risk assessment must cover emergency preparedness, response, and containment to prevent and mitigate impacts on the Port, community, and environment.

7.2 RADIATION SAFETY

The leases within the bulk material handling facilities, at the Port of Geraldton, are registered mine sites under the *Work Health and Safety (Mines) Regulations 2022*, and as such, the management of radioactive material as prescribed in the regulation are triggered when the activity concentration in any material being stored or handled within these leases exceeds 1 Bqg^{-1} .

Any products classified as radioactive under the *Radiation Safety Act 1975* or regulations, must be managed in accordance with a Radiation Safety Management Plan approved by the Radiological Council of Australia. The monitoring and management of such products remains the responsibility of the Customer and therefore Radiation Management Plans must cover the transport to, storage within, and shiplading activities in the Port of Geraldton.

Customers must provide MWPA with evidence that Radiation Safety Management Plans have been approved by the Radiological Council and endorsed by DEMIRS where appropriate. Any Port specific controls should be discussed and documented in the Pre-Shipment Risk Assessment. The key management requirements within the Port include minimising occupational exposure, prevention of dust, spillage or contamination of the wharf, or lease areas.

7.3 BIOSECURITY DETERMINATION

Australian Ports must hold a biosecurity determination for specified international vessels and imported goods. *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 2015* allowing for the following vessels and goods to enter the Port.

- Commercial international cargo and passenger vessels.
- Passenger baggage carried on a passenger vessel (but cannot disembark the vessel).
- Inorganic Bulk Goods.
- Waste.

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. The Port of Geraldton is a 'Non-First Point of Entry' for the following.

- Freight Containers
- General Goods
- International non-commercial vessel (for example, private, recreational)
- Non-commercial vessel waste
- Non-commercial vessel baggage

Vessels or goods arriving at a port that is not designated a first point of entry must apply and get permission from *Department of Agriculture Fisheries and Forestry (DAFF)* using the *Australian Maritime and Aircraft Reporting System (MARS)*. Any Port specific biosecurity controls should be discussed and documented in the pre-shipment risk assessment.

7.4 WORK HEALTH AND SAFETY

This Procedure ensures that MWPA fulfil its work health and safety duties as defined within the *Work Health and Safety Act 2020*, specifically in the management and control of workplaces to protect the health and safety of all Port users and the broader community.

A detailed review of the Safety Data Sheet (SDS) and laboratory analysis should be completed for all new bulk granular products. SDS 'hazard phrases' should be reviewed to identify the potential for workplace injuries or illness. Toxins and carcinogens should be reviewed against workplace exposure standards for airborne contaminants to identify the need for occupational exposure monitoring requirements and additional PPE controls.

If potential occupational hygiene or public health impacts are identified associated with the product or the product contains hazardous materials a full risk assessment undertaken by a third-party specialist may be appropriate. Advice should be sought from the *Department of Health* in relation to the scope and requirements of health risk assessments.

7.5 ENVIRONMENTAL APPROVALS

In accordance with Part V, Division 3 of the *Environmental Protection Act 1986*, Geraldton Port is a Prescribed Premises (*Environmental Protection Act Regulations, Schedule 1, Category 58*) and as such, is required to operate in accordance with its environmental licence. The environmental licence, **L4275/1982/15**, is regulated by DWER.

The scope of the environmental licence includes the loading or unloading of vessels (ships) with bulk granular materials by open material loading systems. Open material loading systems include the use of front-end loaders, conveyors, shiploaders, open containers, grab buckets and hoppers. The material loading system is considered by DWER to include the in-loading, storage, and transfer of materials anywhere within the Port's licence boundary.

Handling new cargo or handling licenced products via a new method or in a location not previously used may trigger the requirement for MWPA to submit a Trial Notification and/or a Licence Amendment request to DWER (refer to **Attachment C: Approval Decision Trees**). The storage or handling of any new product identified as requiring a licence amendment may not be conducted until DWER approvals are obtained. To do so is considered an environmental licence breach and would result in prosecution under the regulations.

A works approval will be required when any new infrastructure is to be constructed or installed within the MWPA environmental licence prescribed premises boundary that is directly linked to the loading, handling, or storage of bulk granular materials, or may alter emissions, or generate new waste discharge points within the premises.

A pre-submission scoping meeting is recommended to be held between the Customer, MWPA and DWER to discuss likely requirements for amendments to MWPA Environmental Licence or Works Approvals. This meeting will be facilitated by MWPA and should be held once there is a good understanding of how the cargo will be handled and stored, along with a thorough and documented risk assessment with appropriate controls identified to mitigate any identified risks.

7.5.1 Trial Notification

A Trial is defined, within the DWER Guideline: *Port Authority bulk handling trials (Draft 2022)*, as a test period during which:

- the Port Authority receives and stores, loads and/or unloads a new bulk granular material, not specified in the current licence for that premises; or
- the Port Authority loads and/or unloads a bulk granular material, specified in the current licence for that premises, using a handling method which has not previously been used for that product at the premises; or
- the Port Authority loads and/or unloads a new bulk granular material, not specified in the current licence for that premises, using a handling method not stated in the current licence.

MWPA environmental licence contains Trial conditions that allow for a 12-month operational period where up to 1,000,000 tonnes of product can be handled within the Port. The Trial provides for the collection of monitoring data and the optimisation of handling processes, including variables such as shiploader head type, conveyor speed and loading rate, moisture content, and other factors which allow for the selection of optimum or new and innovative methods to minimise emissions and discharges. A Trial triggers additional reporting requirements and a need to amend the environmental licence before the end of the 12-month period to allow ongoing shipments.

MWPA must notify DWER 30 calendar days prior to the Trial commencing per the environmental licence conditions. The Trial Notification requires an assessment of the handling method and the product composition to demonstrate that there will be no unacceptable impacts to public health, amenity, or the environment. The laboratory analysis requested by MWPA is specified within the DWER Guideline and summarised in **Attachment A Table 2**.

MWPA shall notify its Board of any new products or handling methods as part of executing commercial agreements with its Customers.

Any products that have a potential to alter emissions or discharges are generally not acceptable for Trial and will require a Licence Amendment application to be submitted to and granted by DWER (refer to **Attachment C**).

7.5.2 Licence Amendment

A licence amendment is required under s.59 of the *Environmental Protection Act 1986* where a change to operations may cause an emission or alter the nature, or volume of the waste, noise, odour, or electromagnetic radiation emitted from a Prescribed Premises.

DWER assess the risks to the environment, public health, and amenity from the operation of the premises and determine how appropriate proposed controls for those risks are. DWER will assess the proposal and amend the Port's existing environmental licence to address specific hazards related to the operation of proposed storage, handling and loading systems as well as the chemical and geochemical composition and physical properties of the cargo itself. Therefore, it is critical the Customer provides all laboratory analysis and independent assessments to support licence submission to ensure the approval process occurs in a timely manner.

The Customer will be responsible for the fees associated with the Licence Amendment application and responsible for contributing to the development of the required documentation. The documentation will be submitted to DWER by MWPA.

Any amendment to MWPA Environmental Licence has the potential to change the organisation's risk profile through the introduction of new compliance obligations. Before a licence amendment submission is made to DWER, such proposals should first be endorsed by the MWPA Board; the Chief Executive Officer is to provide direction in this regard.

7.5.3 Works Approval

Section 54 of the EPA Act has provisions for works approval applications and it is an offence under Sections 53 and 56 of the Act to take certain actions on a Prescribed Premises unless actions are taken in accordance with a works approval.

If the Customer is to be responsible for the construction and operation of the new infrastructure the Customer will be responsible for the fees associated with the Works Approval application and responsible for developing the required documentation. The documentation will be required to be submitted to MWPA who will facilitate the amendment process as the licence holder.

When preparing the application, if the work is likely to be completed in stages (and therefore DWER sign-off of completed work in stages), the application should clearly outline the different stages. For example, if a project involves an in-loading circuit, storage shed and out-loading circuit, three separate stages should be identified. DWER has advised they are unlikely to sign-off the completed work in stages unless this has been clearly outlined at the application stage.

If MWPA constructs and retains ownership of the infrastructure, then the Works Approval application will be prepared and paid for by MWPA.

7.5.4 Applications to DWER

Works Approval and Licence Amendment applications shall include a risk assessment of the proposal and its emissions to air, land or water from the premises, so DWER can:

- validate the risk assessment of the emissions and discharges;
- validate the sensitive receptors identified within the risk assessment; and
- assess the controls proposed to mitigate the risks.

Environmental aspects that need to be considered in the proposal include but are not limited to the following.

- Fugitive dust emissions during handling and loading of the cargo, including consideration of cumulative dust impacts with existing Port operations.
- Handling of waste products, including washdown water, associated with the proposal.
- Housekeeping and stormwater management to prevent discharges to the marine environment.
- Potential environmental impacts associated with emergency situations (for example, a large cargo spillage).
- Containment of product and dust within storage facilities and the loading circuit.
- Noise emissions associated with the project, including cumulative impacts with existing operations at the Port.

Approval applications cannot be successfully submitted until the risk assessment and supporting product analysis has been received from the Customer.

During the assessment DWER may:

- ask for modelling or further information if required; and
- place licence conditions around what type and frequency of monitoring is required.

During the assessment of licence amendment and works approval submissions DWER will identify and evaluate the risks to the environment, public health, and amenity from the construction of the new infrastructure and its operation within the premises and condition the controls for those risks. It is critical that all parties have an opportunity to review draft instruments (Works Approval or Licence) to ensure conditions are understood and can be met.

Refer to **Attachment B: Environmental and Sustainability Requirements for Port infrastructure** for more detailed WHSE requirements at Geraldton Port.

7.5.5 Timeframes for Environmental Approvals (New Cargo)

DWER approval of new cargos may take up to six months to gain and likely timeframes determined during the pre-submission scoping meeting held with the Department. For more information on Licences and Works Approval processes please refer to the DWER Guidance for activities regulated under the EP Act 1986 and EP Regulations 1987:

- *Guideline: Industry Regulation Guide to Licensing (June 2019)*
- *Guideline: Decision making (June 2019)*
- *Guideline: Risk Assessments (December 2020)*

8 Consultation (STEP 11 & 13)

8.1 MID WEST PORT AUTHORITY

All new products, requiring an amendment to the environmental licence, introduced to the Port of Geraldton are subject to an internal review and preparation of a Decision Paper for the Board to approve.

Products that may introduce new hazards to the workforce or community will require consultation with MWPA workforce. Customers may be asked to present to, or provide information for, consideration by MWPA Health and Safety Representatives and employee consultation committees.

8.2 REGULATORY AND LOCAL GOVERNMENT AGENCIES

Consultation with the relevant regulatory bodies and local government agencies is maybe required early in the assessment of a new cargo proposal. The level of assessment required for a new cargo and the level of detail needed from the customer can vary significantly depending on how well risks associated with a particular cargo are understood.

Departments that the MWPA may consult regarding a new proposal could include:

- Department of Water and Environmental Regulation (**DWER**);
- Department of Biodiversity, Conservation and Attractions (**Parks and Wildlife**);
- Department of Energy, Mines, Industry Regulation and Safety (**DEMIRS**);
- Department of Agriculture, Fisheries and Forestry (**DAFF**);
- Department of Health (**DoH**);
- Department of Transport (**DoT**);
- Main Roads Western Australia (**MRWA**); and
- City of Greater Geraldton (**CGG**).

MWPA will invite the Customer to participate in consultation sessions and may request the customer make presentations on their project or characteristics of the cargo.

8.3 COMMUNITY ENGAGEMENT

Dangerous Goods, new product types, or infrastructure requiring approval from DWER or DEMIRS via a licence amendment or works approval will require the Customer to demonstrate that consultation has been undertaken with key stakeholders. MWPA can assist Customers access Port stakeholders via existing consultation forums including the:

- Fishing Boat Harbour Consultation Committee;
- Stakeholder (Community) Consultation Committee; and
- Port User Group Meetings.

9 Regulatory Approval Submission (Step 14)

Customers are to provide records of any consultation undertaken with the community, regulators or local government agencies along with a finalise Pre-shipment Risk Assessment. The outcomes of all stakeholder consultation and risk assessment will be collated and support MWPA submissions to regulators as required.

10 MWPA Internal Review (STEP 15)

Prior to entering into a formal commercial agreement with a new Customer, MWPA must undertake an internal review as a form of due diligence to ensure no new risks are being introduced to the Port that could negatively impact the community, its workforce, or the organisation's reputation. This review also seeks to identify opportunities for positive impacts for growth, prosperity, and innovation.

The New Cargo Checklist must be signed by key MWPA Department representatives verifying that each department is satisfied with the information provided by the Customer and that all risks have been adequately identified.

11 Port Access and Service Agreement (Step 17 & 18)

Once all internal reviews and Board endorsement has been obtained MWPA will execute a Port Access and Services Agreement (PASA). The agreement will outline any special conditions, management plans, product specifications and compliance obligations.

The PASA is not approval to commence storage, export or imports of cargo. All regulatory approvals must be granted prior to MWPA giving permission to commence operations within the Port prescribed premises boundary.

12 Monitoring Requirements (Step 19)

MWPA maintains several emissions monitoring programs which Customers contribute to financially as part of their Port fees.

12.1 OCCUPATIONAL EXPOSURE

Customers, stevedores, and logistics companies must ensure they meet their own duty of care requirements under the *Work Health and Safety Act 2020* in terms of having suitable handling procedures, supplying appropriate PPE, and undertaking occupational hygiene monitoring programs for their direct employees and contractors.

MWPA undertakes targeted exposure monitoring programs for its employees and contractors.

MWPA may request information from Customers on exposure monitoring undertaken within the Port.

12.2 AIR QUALITY

MWPA's Dust Management Plan and ambient air quality monitoring programs assess the air quality in and around the Port against licence and air quality targets. Nuisance dust guidelines are used as a means of determining the severity of impacts to amenity. The dust collected is analysed for several metal and mineral components to assist in identifying possible sources within the Port.

Each Customer will be required to comply with the MWPA Dust Management Plan and develop operational specific plans and procedure to minimise dust impacts from products they handle within the Port of Geraldton.

Licence Trial Conditions may trigger additional air quality monitoring to be undertaken during any 12-month trial period. Associated Customers may be required to fund or coordinate additional air quality monitoring for the period of a trial.

12.3 MARINE WATER AND SEDIMENT QUALITY

MWPA has a comprehensive Marine Environmental Monitoring and Management Plan as required as a condition of the site environmental licence. This program measures the effectiveness of controls and material handling practices. Analytes have been chosen to assist in identifying the source of contaminants within the Port.

12.4 GROUNDWATER MONITORING

MWPA annual groundwater monitoring program is designed to identify any impacts of products handled or activities within the Port on soil and groundwater. When new products are introduced to the Port the groundwater monitoring program should be reviewed to ensure suitable analytes are being assessed in this program.

13 Compliance Obligations (Step 20)

Compliance with MWPA Environmental Licence is one of the Port's most important obligations. Failing to comply has significant penalties including fines, loss of environmental licence and so the right to operate the Port, and major reputational damage. Upon entering into a commercial agreement with MWPA, Customers become legally bound to comply with the conditions of the MWPA Environmental Licence and any associated Works Approvals and Port procedures.

13.1 CUSTOMER COMPLIANCE OBLIGATIONS

Commercial agreements will ensure that the Customer is obligated to provide all information and records in a timely manner to enable MWPA to comply with regulatory reporting requirements. Such information may include a product specific dust management plan, pre-shipment moisture content, updated SDS.

13.1.1 Complaints

MWPA maintains a register of all complaints received either internally from its workforce or other Port users and externally from the community or local agencies. If a complaint is determined to be associated with a specific activity or Port user (Customer) a representative of MWPA Trade and Commercial Services or WHSE Departments will contact the Customer and notify them of the complaint. Customers will be required to aid in investigating and responding to complaints.

MWPA reports all complaints received annually to DWER as part of its Annual Environmental Report.

13.1.2 Licence Limits and Target Exceedances

MWPA Environmental Licence mandates certain environmental quality monitoring programs to be maintained and reported against. Emission targets and limits have been set for air, sediment, and marine quality.

Air quality is monitored in real time for particulate matter (dust). Automated alerts allow MWPA to detect the potential for exceeding air quality targets. If dust levels become elevated and indicate a possibility for a breach in air quality targets, MWPA may suspend loading activities to allow the source of the dust to be isolated and managed.

MWPA will work with Customers to ensure bulk granular products are conditioned with moisture correctly or managed through wind and loading parameters.

13.1.3 Product Specific Operational Requirements

DWER may place product specific operational parameters on bulk products it deems to be of a higher risk. Parameters such as moisture levels, loading method, washdown water management, wind direction, timing, and frequency of shipments may be specified. Customers must ensure these requirements are understood and always complied with.

Customers are obligated to ensure any third parties engaged to handle their products (for example, logistics companies or stevedores) are aware of the Licence requirements specific to their product and that Safe Work Procedures and risk assessment tools such as Job Safety and Environmental Analysis identify these requirements and include appropriate control measures.

MWPA will confirm operational readiness via pre-shipment meetings and post shipment debriefs as required.

13.1.4 Incident Investigations

At any time, noncompliance with the regulations, licences, permits or procedures are identified MWPA will request a full investigation to be undertaken. Customers may be asked to lead the investigation if activities directly under the Customers control are deemed to be the cause of the event.

A MWPA representative should participate in the investigation and a final investigation report issued to MWPA within 21 days of the event to support MWPA meet its regulatory reporting obligations.

13.1.5 Records

Customers are expected to complete routine product analysis to demonstrate their product has not changed over the life of their operation. At any time, the Customer updates its SDS, reclassifies its products DG class or identifies a change in quality the Customer must notify MWPA as soon as possible and provide a revised risk assessment, SDS and operating procedures prior to the next scheduled shipment of the product.

14 MWPA Contacts

MWPA Trade and Commercial Manager is the Customers first point of contact. The Trade and Commercial Manager will provide Customers with key contacts within the MWPA Safety, Environment and Sustainability functions who will clarify WHSE requirements. Copies of MWPA Policies and Environmental Licence are available on the MWPA website: <https://www.midwestports.com.au/>.

15 Associated Documents

Document Title
MWPA New Cargo Checklist
New Cargo Pre-Shipment Risk Assessment Template
MWPA Environmental Management Plan
MWPA Dust Management Plan
MWPA Work Health and Safety Management Plan
MWPA Worker and Port User Handbook
MWPA Incident Management Procedure

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

16 References

Act or Regulation
<i>Biosecurity Act 2015</i>
<i>Dangerous Goods Safety Act 2004</i>

Act or Regulation
<i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i>
<i>Environmental Protection Act 1986</i>
<i>Environmental Protection Regulations 1987</i>
<i>Port Authorities Act 1999</i>
<i>Radiation Safety Act 1975</i>
<i>Rail Safety National Law Application Act 2024</i>
<i>Rail Safety National Regulations (WA) 2025</i>
<i>Work Health and Safety Act 2020</i>
<i>Work Health and Safety (General) Regulations 2022</i>
<i>Work Health and Safety (Mines) Regulations 2022</i>
Location - Western Australian - https://www.legislation.wa.gov.au Australian - https://www.legislation.gov.au
Standards and Guidelines
Guideline: Port Authority bulk handling trials (DWER 2018)
Guideline: Odour Emission (DWER June 2019)
Guideline: Environmental Siting (DWER Dec 2020)
Globally Harmonized System of Classification and Labelling of Chemicals (GHS) (United Nations 2011)
Workplace Exposure Standards for Airborne Contaminants (Safe Work Australia 2019)
Australian Dangerous Goods Code for The Transport of Dangerous Goods by Road and Rail (ADG Code)
MARPOL International Convention for the Prevention of Pollution from Ships Annex V - Prevention of Pollution by Garbage from Ship (International Maritime Organisation 1988)
International Maritime Solid Bulk Cargoes Code (IMSBC) (International Maritime Organisation 2008)
International Maritime Dangerous Goods Code (IMDG) (International Maritime Organisation 2020 Edition)
AS4964 - 2004 Method for the qualitative identification of asbestos in bulk samples
AS1141.3.1-2012 Methods for sampling and testing aggregates
ISO 16258-1:2015 Workplace air- Analysis for respirable crystalline silica by X-ray diffraction
ISO 7708-1995: Air quality - Particle size fraction definition for health-related sampling. (International Organisation for Standardisation. 1995).
Fresh and Marine Water, Soil and Sediment Quality Guidelines (ANZG 2000) (Australian and New Zealand Environment and Conservation Council (ANZECC), and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ))

17 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**.

18 Administration

Document Custodian:	Safety Manager
Document Approver:	Environment & Safety Managers
Approval Date:	12 May 2025
Document Review Period:	2 yrs

Attachment A: WHSE Information Requirements of Customers

Table 1: Public Health, Amenity, and Environmental Risks and Hazards for Consideration in the Pre-shipment Risk Assessment.

Aspect	Assessment	Product Information	Relevant Standards / Codes / Guidelines
Workforce and Public Health	Harm, illness, or disease risks: <ul style="list-style-type: none"> • Toxicity (Carcinogens and Poisons) • Irritants (Skin, eye, lung) • Radiological components • Biological • Respiratory disease risks • Asbestos • Crystalline Silica 	Particle Size Distribution Chemical and geochemical composition Trace element analysis Natural Occurring Radioactive Materials Fibrous materials analysis Safety Data Sheet	<ul style="list-style-type: none"> • World Health Organisation Global Air Quality Guidelines • National Occupational Health and Safety Standards: <ul style="list-style-type: none"> • Workplace exposure standards for airborne contaminants • Classifying hazardous chemicals • Hazardous chemicals requiring health monitoring • Health monitoring guides for nickel, lead, asbestos, silica • <i>AS/NZS1269.1:2005 Occupational noise management— Measurement and assessment of noise emission and exposure</i> • <i>AS 4964:2004 Method for the qualitative identification of asbestos in bulk samples</i> • <i>ISO 16258-1:2015 Workplace air- Analysis for respirable crystalline silica by X-ray diffraction</i>
Amenity	Property damage or nuisance capability: <ul style="list-style-type: none"> • Fugitive Dust • Odour • Noise • Light 	Particle Size Distribution <ul style="list-style-type: none"> • PM₁₀ and P_{2.5} • PM₁₀₀ Moisture content Transport Moisture Limit Dust Extinction Moisture Level	<ul style="list-style-type: none"> • National Environmental Protection (Ambient Air Quality) Measures • DWER Guidelines for: <ul style="list-style-type: none"> • Odour Emission (June 2019) • Environmental Siting (Dec 2020) • Assessment of environmental noise emission (Draft) • Dust emissions (Draft)
Ecosystem Health (Terrestrial, groundwater and marine)	Toxicological and ecotoxicity Risks: <ul style="list-style-type: none"> • Solubility • Bioavailability • Bioaccumulation 	Leachate testing for Metal and Metalloids Nutrients pH	<ul style="list-style-type: none"> • <i>MARPOL International Convention for the Prevention of Pollution from Ships Annex V - Prevention of Pollution by Garbage from Ship</i> • <i>Fresh and Marine Water, Soil and Sediment Quality Guidelines - Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ), 2000</i>

Aspect	Assessment	Product Information	Relevant Standards / Codes / Guidelines
Safety	Physical and operating hazards: <ul style="list-style-type: none"> • Flammable • Explosive • Reactive • Corrosive 	Safety Data Sheet Classifications: <ul style="list-style-type: none"> • Dangerous Goods • Hazardous Material • Controlled Waste Physical Properties (gas, liquid, fumes, dust) PPE Requirements	<ul style="list-style-type: none"> • <i>Landfill Waste Classification and Waste Definitions</i> • <i>Globally Harmonized System of Classification and Labelling of Chemicals</i> • Australian Codes for the: <ul style="list-style-type: none"> • Transport of Dangerous Goods by Road and Rail • Storage and Handling of Dangerous Goods

Table 2: Recommended Laboratory Analysis

Component	MWPA Threshold Level	Method / Standard
Asbestos (%) <i>Determine the presence or absence of asbestiform fibres</i>	Material does not contain asbestos in concentrations $\geq 0.01\%$ w/w for non-friable asbestos or 0.01% w/w for fibrous asbestos.	Fibre characterisation by Polarised Light Microscopy (PLM) technique following AS 4964-2004 Method for the qualitative identification of asbestos in bulk samples. Using a stockpile sampling method consistent with AS 1141.3.1 Methods for sampling and testing aggregates
Respirable Silica (%) <i>DWER consider there to be a potential for crystalline silica if dust fractions include particles of 10 micron or smaller.</i> <i>Respirable is defined as PM4 in ISO 7708</i>	Material does not contain respirable silica $\geq 1\%$ w/w.	ISO 7708 to define Respirable as PM4, ISO 16258-1:2015 Workplace air- Analysis for respirable crystalline silica by X-ray diffraction Or Respirable alpha-quartz concentration analysis by X-ray diffraction (XRD) and scanning electron microscopy (SEM) using the modified size weighted respirable fraction (SWeRF) method following ISO13320:2020 Particle size analysis – Laser diffraction methods
Particle Size Distribution (%) <i>Range to include 100 to 2.5 microns</i>	Material does not contain more than 3% of total particles of 10 microns or finer.	Methods for sampling and testing aggregates fine particle size distribution (AS 1141.3.1 Methods for sampling and testing aggregates)
Dust Extinction Moisture (%)	Material will be handled at or above calculated DEM where it can be determined.	AS 4156.6-2000 Coal Preparation Part 6: Determination of Dust/Moisture Relationship for Coal
Transport Moisture Limit (%)	<i>(Not required for Trial Notification but can be useful to understand if DEM is achievable.)</i>	International Maritime Solids Bulk Cargoes (IMSBC) Code 2020 AS 1289.3.5.1. Methods of testing soils for engineering purposes
Specific Radioactivity (Bq/g)	Material does not exceed: <ul style="list-style-type: none"> the radiation transport limit of 10 Bq/g for Uranium-238 and Thorium-232 combined; or Rubidium-87 concentrations of 30 Bq/g. 	Radionuclides by Gamma Ray Spectrometry in Solid AS303/AS406 . Uranium 238 and Thorium 232 in Soil by Activity Conversion from elemental concentrations ARS-SOP-AS106
Geochemical components and Trace Elements (mg/kg or %)	Should including the following elements: aluminium, arsenic, cadmium, caesium, chromium, cobalt, copper, lead, lithium, manganese, mercury, nickel, phosphate, selenium, tin, vanadium, and zinc.	X-Ray Fluorescence (XRF)

Component	MWPA Threshold Level	Method / Standard
Leachate Testing <i>Metals and Metalloids (µg/L)</i> <i>Manufacture products such as fertilisers should include an assessment of nutrients: Ammonia, Total Nitrogen, Nitrates, Nitrites, Total Phosphates (µg/L)</i>	Leachate tests return results below ANZECC and ARMICANZ (2000) Derived Guideline Values (DGV), specifically for the metal and metalloid marine toxicant default guideline values for protecting aquatic ecosystems. Results above DGVs may indicate possible bioavailability. Based on results, further ecotoxicity analysis may be required by MWPA.	Australian Standard Leaching Procedure (ASLP), using deionised water and acetic acid (pH 5) in accordance with AS 4439.3-1997 Wastes, sediments, and contaminated soils: Preparation of leachates - Bottle leaching procedures.
Ecotoxicity Assessment	If soluble metals or nutrients are determined to be above ANZECC DGVs, then DWER requires further information on the potential toxicity to marine environments.	MWPA recommends customers seek an independent assessment from a toxicologist to determine if the product is 'harmful to marine environments' in accordance with the MARPOL Annex V criteria and using ecotoxicity reference values for marine organism based on the criteria in the International Maritime Dangerous Goods Code (IMO2010).
Waste Classification	Material does not comprise partially or completely of tailings; and/or are not classified as construction or demolition, or a hazardous waste.	As defined in Landfill Waste Classification and Waste Definitions 1996 (as amended 2019).

Note: DWER generally requires NATA Accredited Laboratory Methods.

Attachment B: Environmental and Sustainability Requirements

This attachment presents a summary of MWPA sustainability and environmental considerations to ensure emissions and discharges to air, land and water are minimised and to prevent pollution and long-term contamination of lease sites.

This attachment has been compiled to support customers in preparing risk assessments and identifying appropriate control measures.

OPEN STOCKPILES

- Automated sprinkler systems.
- Screening or wind fencing.
- Stormwater containment and treatment within lease.
- Site specific dust management plan.

ROAD OR RAIL UNLOADER

- Above and below ground dust extraction to prevent the escape of dust from the facility.
- Automated doors to prevent the escape of dust.
- Sprinkler system to manage moisture content – wetting may be required prior to, or after, dumping. Sprinkler systems should be automated with belt cargo sensors.
- Conveyor systems designed to prevent spillage.
- Spill containment.
- Stormwater storage and treatment.

CONVEYOR AND SHIPLoadERS

- Conveyor systems fully enclosed or fitted with wind shields to prevent wind lift-off of material.
- Conveyor spill prevention and containment (skirting, belt cleaners, catchment trays).
- Dust suppression systems (sprays, foam, or fogging systems) at transfer points.
- Dust extraction within transfer towers.
- Noise minimisation (noise attenuating enclosures, screens, and fences).
- Product specific chutes and shiploader heads.

WASTEWATER AND STORMWATER MANAGEMENT

- Stormwater containment and treatment via coarse pollution traps to remove particulates and hydrocarbons, prior to release to the environment.
- Wastewater management to ensure no material discharges to the marine environment.
- Wastewater must be managed within the lease and returned to Customer's operations. No wastewater treatment or disposal facilities are provided by MWPA.
- Sumps routinely cleaned of sludges and product build-up. No solid waste disposal facilities are provided by MWPA.

SHED DESIGN

- Concrete footings and flooring to prevent soil contamination and assist sealing of all doorways / openings.
- Concrete wall at base to prevent corrosion and loss of product.
- Sufficient room for loaders and other plant to operate without requiring shed doors to be open.
- Sealed walls and roofing to create a negative pressure environment to prevent escape of dust.
- Dust extraction systems, including independent dust extraction for internal feed hoppers.
- Conveyor loading systems designed to prevent spillage.
- Sprinkler system to allow cargo moisture content management. Depending on the nature of the product the application of a wetting agent may be required.
- Management of stormwater within lease.
- Building envelopes should be above the level of a 1/100-year flood and inundation.
- Rainwater and wash water capture and recycling where possible.
- Capacity to clean loaders and mobile plant onsite.
- Systems to prevent the tracking of product outside of the shed (washdown, rumble strips, tyre cleaners).
- Adequate internal lighting and cooling systems – sheds must have doors closed during material handling.
- Sealed access and egress area to prevent road damage and dust generation.
- Consideration of solar power and net zero emission initiatives (for example, EVs forklifts, sweepers, loaders).

GENERAL HOUSEKEEPING

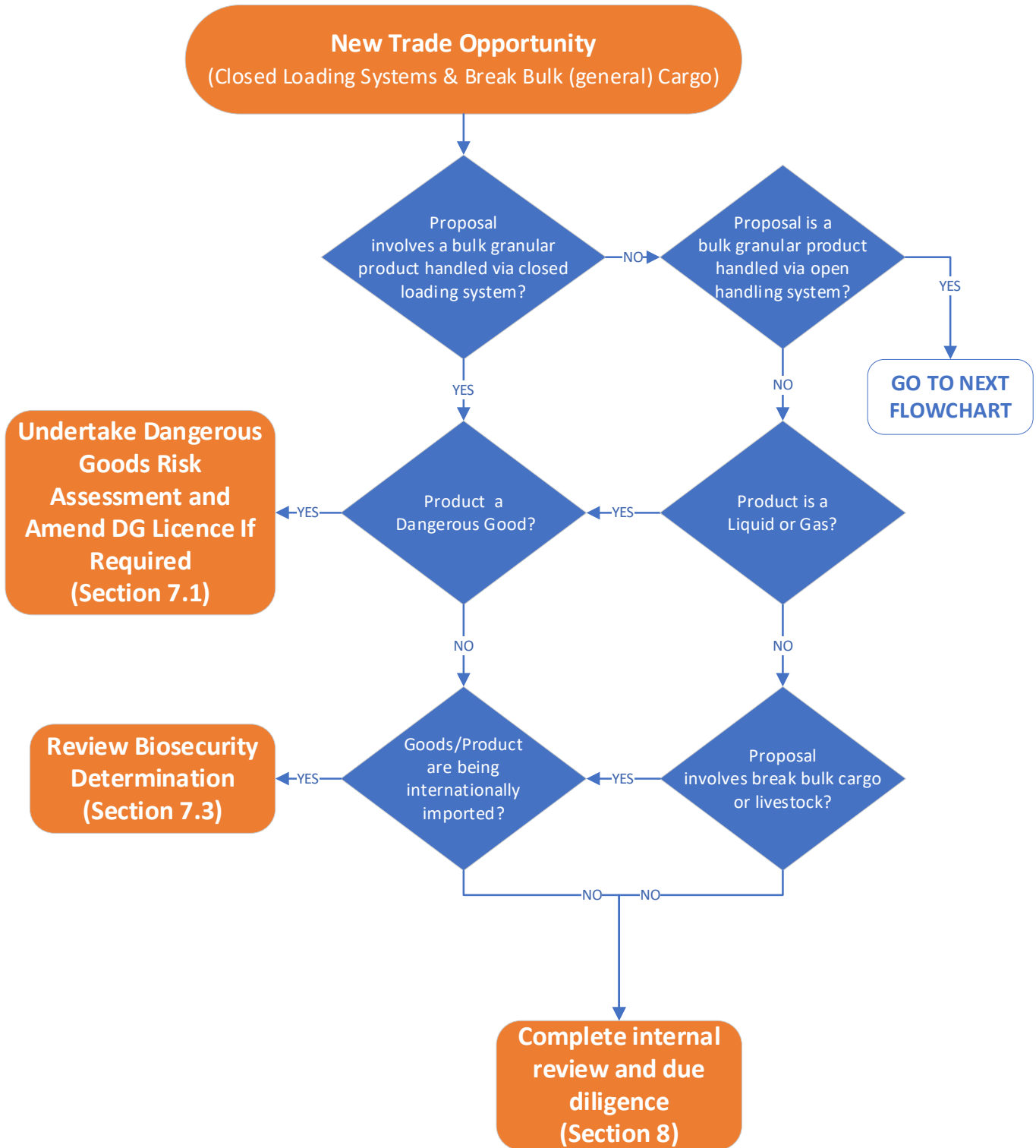
- Maintenance of facility to ensure its continued integrity of dust extraction systems.
- Prevent accumulation of material within lease – regular sweeping or other control may be required.
- Immediate response to spillages on roads or outside of sheds is required.
- Recover all materials spilled. Berths must be kept clean and free from spilt product.
- Shed doors are to be kept closed except when vehicles are exiting or entering. Shed doors are not to be open during potentially dust generating activities.
- Storage and handling of hydrocarbon or other dangerous goods within purpose-built facilities including signage, bunding and spill containment.
- Provision and maintenance of incident response equipment (for example, spill kits and fire extinguishers)

WORK HEALTH AND SAFETY CONSIDERATIONS

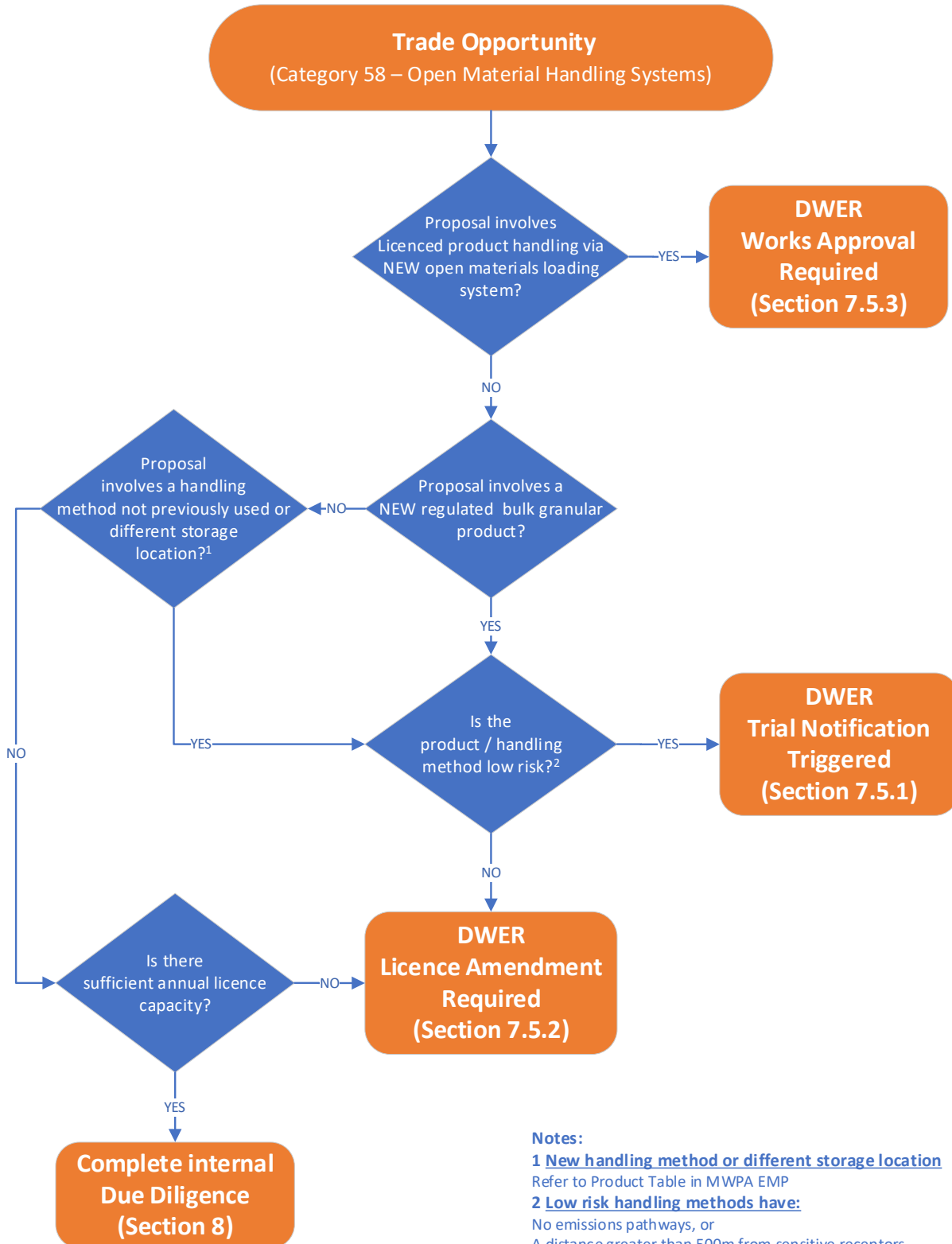
- Adequate amenities and parking for workforce.
- Waste management facilities as appropriate (for example, Controlled wastes, contaminated PPE, Biosecurity).
- Buildings have DFES Certification and conform with Building Code of Australia, including consideration of appropriate cyclone ratings.
- Permit to Work considerations.
- Traffic control considerations.
- Emergency management and contingencies.

Attachment C: Approval Decision Trees

Closed Loading Systems and Break-Bulk Cargos



Bulk Granular Products via Open Material Handling Systems



Notes:

1 New handling method or different storage location

Refer to Product Table in MWPA EMP

2 Low risk handling methods have:

No emissions pathways, or
A distance greater than 500m from sensitive receptors.

Low risk products are:

Low in solubility, and
Not toxic to marine environments, and
Not hazardous or harmful to humans.

(Refer to DWER Guideline: Port Authority Bulk Handling Trials)