

Operational Environmental Management Plan

Visy Pulp & Paper Tumut Mill

Issued By: HSE Manager
Issued Date 28 February 2023
Document no. PLANS-VPP-TUM-HSE-001-5
This is a controlled document



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1.0 Introduction

1.1 Background

Visy Pulp and Paper Tumut (VPP) is a fully integrated unbleached Kraft Pulp and Paper Mill, located approximately 8 km West of Tumut and 7 km east of Adelong in the South West Slopes region of New South Wales. Unbleached Kraft paper is produced from softwood chips and recycled paper, it is used both within Australia and exported overseas to be used in the construction of cardboard boxes and other packaging. The main source of fibre for paper manufacturing is from *Pinus radiata* delivered to the mill in the form of pulpwood logs from softwood plantations located in the local Hume region as well as other outside regions and sawmill/residue chip, a waste product from local sawmilling operations located mainly at Tumut and Tumbarumba, but also some from outside the region. Recycled wastepaper is collected by Visy's Recycling division as well as other suppliers and comes from mainly New South Wales, Victoria, South Australia and the ACT. The site has recently commenced WTL (White Top Liner) paper manufacturing, using purchased BKP (Bleached Kraft Pulp) which is delivered to site in bales.

Development Approval for the project was obtained on 29 November 1998 pursuant to the provisions of the *Environmental Planning and Assessment Act 1979*. This consent, subject to over 105 individual conditions, was issued for existing operations with capacity of up to 300,000 tonnes per year (tpy) and increase of up to 450,000 tpy for the future mill expansion.

In May 2006, Visy wrote to the Minister for Planning seeking a further increase to the future Mill expansion of up to 700,000 tpy. As this increase was substantially greater than the 450,000 tpy that was originally approved, Visy was required to prepare an Environmental Assessment for the proposed expansion. The subsequent Visy Tumut Mill Expansion Development was granted under Part 3A in May 2007. This approval was granted subject to meeting the Concept and Project Approval Conditions under approval 06_0159.

In December 2016, Visy submitted a development modification application accompanied by an Environmental Assessment for the maximum production tonnage limit increase. Approval was granted on the 7 July 2017 by the NSW Department of Planning & Environment for the maximum production tonnage limit increase to 800,000 tonnes per year (tpy).

The mill at full production will employ approximately 300 people, the majority who will be living within less than an hour's drive from the site. Operations are 24 hours a day seven days a week, with over 1.8 million tonnes of raw resources used within the process.

The Visy property occupies an area of approximately 2,124ha located in the Gilmore Valley, approximately 8km directly west of Tumut Figure 1. The property which was all former farmland is located on both sides of the Snowy Mountains Highway. The actual mill site occupies some 60ha of the property closest to Tabletop Mountain range and wastewater from the mill is irrigated onto the dedicated irrigation area for crops and cereals on Gadara Park, the main Visy property, an area of approximately 110ha which equates to 5.2% of the total property area. This area along with the mill is shown in Figure 2, which captures the scope of the management system.

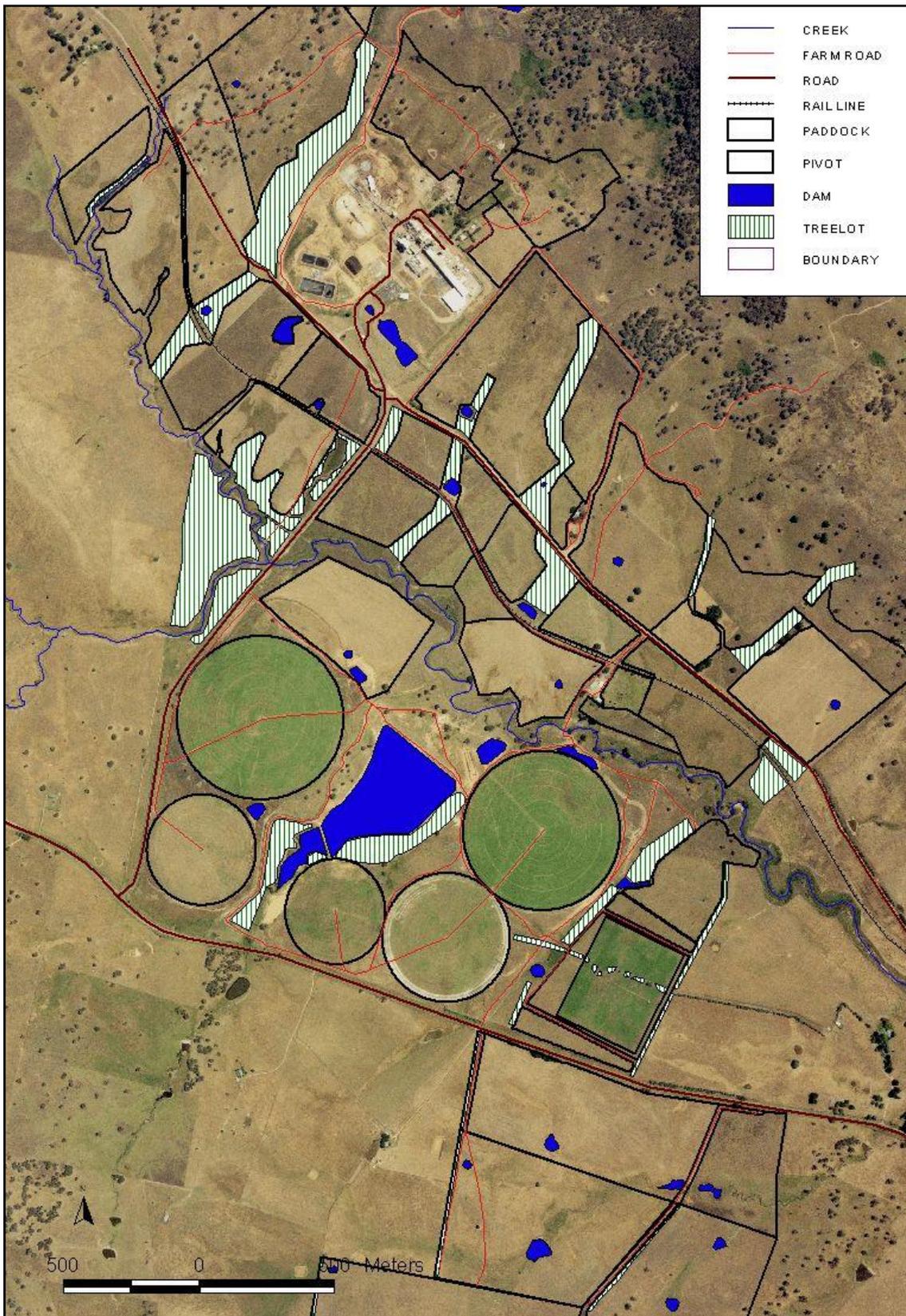


Figure 2.0 Aerial Map of Site

Gadara Park is an established farming enterprise focused on prime beef and lamb production, which is usually running approximately 700 to 800 head of cattle and 3000 to 4000 ewes and lambs depending on seasonal conditions. The irrigation areas produce hay, silage and fodder crops that are fed to the livestock as part of the prime beef and lamb production.

The Visy property is bound to the northeast by the Tabletop Mountain range, to the southwest by “Deep Creek”, to the south by the “Windowie” and “Electro” properties and to the east by “The Lagoon” property.

Sandy Creek flows through the property from the northwest to the southeast, with numerous existing natural drainage lines flowing from the Tabletop Mountain range to Sandy Creek. Sandy Creek flows into Gilmore Creek approximately 2.5 kms downstream of the property boundary and Gilmore Creek flows into the Tumut River a further 5km downstream.

1.2 Project Description

Construction of the existing mill commenced in January 2000 and was completed in May 2001. The official Commissioning period ended on 15 May 2002 and the mill has been operating at full production since that date. The company sought to increase paper production from the originally approved 300,000 tonnes per year (tpy) to 700,000 tpy. While the existing Development Consent permitted an increase in paper production to 450,000 tpy, a new approval was required to increase paper production to 700,000 tpy.

On 24 July 2006, the Minister for Planning authorised Visy to submit a Concept Plan for the expansion of the existing pulp mill to increase production of Kraft liner to 700,000 tpy. The expansion was to be phased, as determined by production requirements, and included the installation of an additional paper machine and pulping capacity including a new recovery boiler and lime kiln.

An Environmental Assessment was prepared to satisfy the requirements for the concurrent assessment and granting of a Concept Approval and an Approval for the project to commence immediately upon granting of the approval. The approval granted for the project applies to all aspects of the project except for the use of non-standard fuels in the multi fuel boiler. A Concept Approval was sought only for the multi fuel boiler and full approval may be sought for this at a later date.

In December 2016, Visy submitted a development modification application accompanied by an Environmental Assessment for the maximum production tonnage limit increase. Approval was granted on the 7 July 2017 by the NSW Department of Planning & Environment for the maximum production tonnage limit increase to 800,000 tpy.

1.3 Operational Environmental Management Plan

The Visy Tumut Operational Environmental Management Plan (OEMP) provides the roadmap for the Environmental Management System at Visy Tumut. The purpose of establishing the environmental management system is to:

- Achieve and maintain compliance with all relevant laws, regulations and standards as well as companies voluntary commitments;
- Identify and manage environmental risks;
- Ensure all personnel understand environmental standards and obligations to the work they perform;
- Plan, document, measure and monitor environmental performance;

- Set and achieve targets for improving performance; and
- Achieve compliance with Visy Environment Policy.

The sites Environmental Management System (EMS), is certified to ISO 14,001:2015 and has been integrated with the site’s Safety and Quality management systems which are both certified to the relevant standards (i.e. AS/ZS 45001:2018, ISO 9,001:2015).

An overview of the Sites EMS is shown in Figure 3 below and the overall document structure is provided in Section 9.

1.4 Objectives and Performance Outcomes

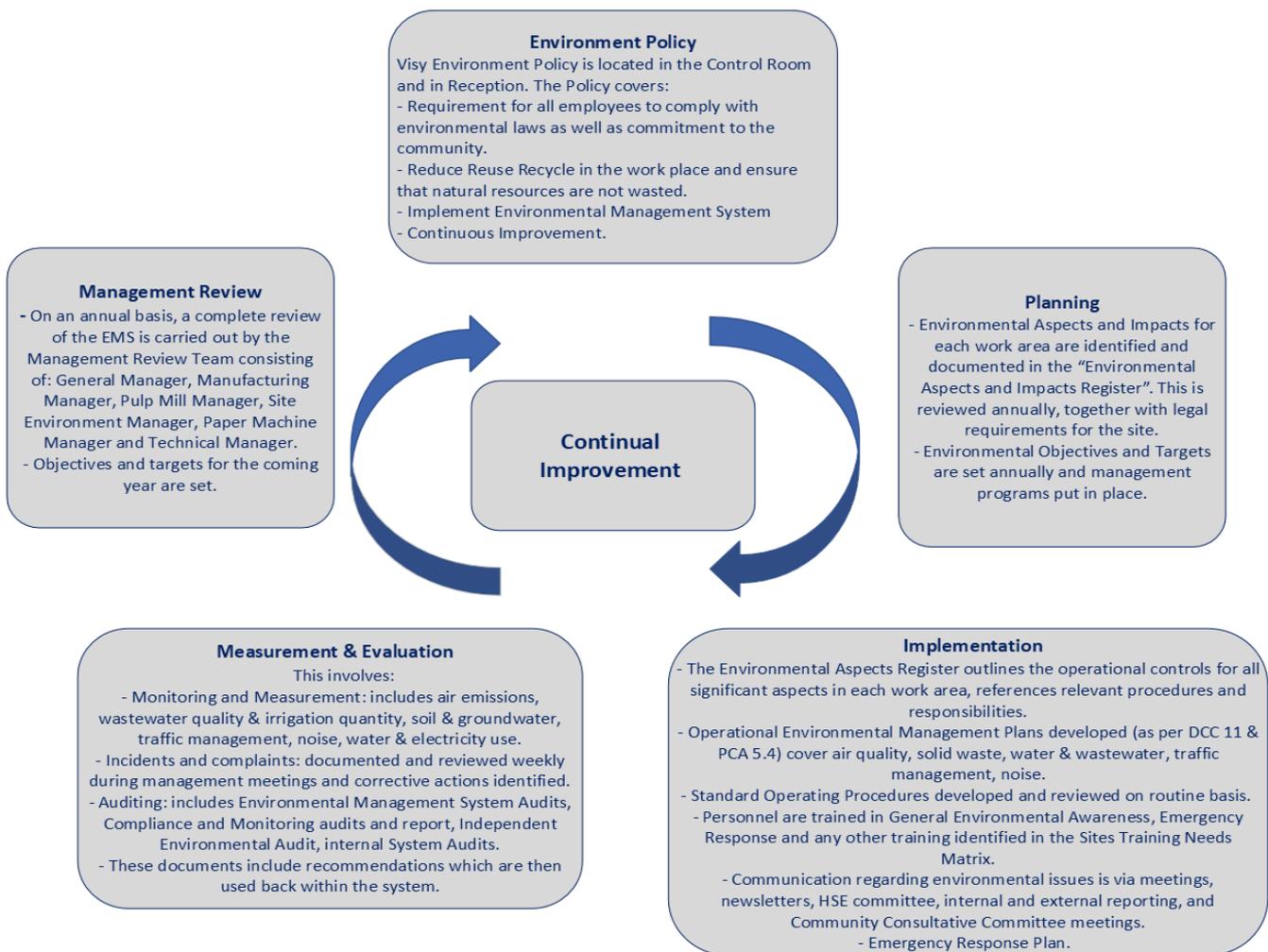


Figure 3.0 Overview of site Environmental Management System (EMS)

Objectives and performance outcomes have been set in each of the updated environmental management plans. Previously objectives and targets had been set yearly, stemming from the annual EMS management review, audit findings and corporate directed items. The Environmental Management objectives and targets are stated in the Bi-annual Visy HSE Plan and site specific objectives and targets are included in the annual Environmental Compliance and Monitoring Report.

2.0 Environment Policy

2.1 Description

Visy has an Environment Policy that states Visy's intentions, commitment and principles in the area of environmental management; a copy is attached in the front of the Management Plans folder. The policy has been developed and approved by Visy's senior management team and is made available to the general public via Visy's web site www.visy.com.au. The policies are reviewed by Visy senior management annually and re-issued if changes are made.

The environment policy covers Visy's principles and commitments in the areas of sustainable development, product stewardship and operational environmental management.

2.2 Site Requirements

The Environmental Representative of Visy Pulp and Paper Tumut, is to ensure current copies of the Visy Environment Policy are clearly posted at reception in the Administration building and the Main Control Room and the requirements are communicated through Site Inductions to all persons working on site.

All Site Senior Management, employees and contractors are required to comply with the requirements of the Visy Environment Policy.

3.0 Aspect/Hazard Identification

3.1 Description

The environmental aspects of Visy's activities, products and services which the organisation can control and those that it can influence must be clearly identified and their level of risk/significance assessed according to the consequence to people, the environment and company exposure.

The assessment should consider current and relevant past activities, products and services, planned or new developments, new or modified activities, products and services and normal, abnormal and emergency conditions. The findings of the assessment must be documented and communicated to relevant personnel.

The assessment is to be conducted with relevant site personnel, i.e. area managers, senior production engineers, site environmental representatives etc, and all findings and controls are to be communicated to those personnel and all those affected.

The environmental management system is to prioritise management of aspects that have been assessed as significant and take these into account in establishing, implementing and maintaining the management system.

Further risk assessments will be required when changes are made to activities, products and services. The risks must be assessed prior to changes proceeding. The Aspects Register is to be updated to reflect the changes.

3.2 Environmental Aspects and Impacts Register

The sites Aspects & Impacts Register has now been incorporated into the Tumut Visy Corporate HSE Risk Register, which has been developed and is maintained by the Site Environmental Representative in accordance with Visy Corporate *Risk Management How To*.

The HSE Risk Register is reviewed at least every 2 years or after any changes made to activities, products or services.

It is the responsibility of the General Manager to ensure that all environmental risks at the site are reduced to levels acceptable to the company, and that impacts are reduced or minimised in accordance with the Visy Environmental Policy.

4.0 Legal and Other Requirements

4.1 Description

Visy legal and other requirements that are applicable to the activities, products and services are to be identified, accessed and communicated in accordance with Visy Environmental Procedure 1001 – *Managing Legal Compliance*.

The legislative or other requirements are to be documented against the relevant aspect in the Aspects and Impacts Register.

Resources made available to sites include:

- Access to legislation, standards, codes of practice and guidelines through the internet or Visy Information Resource Centre.
- Technical support from Visy National Environment Manager, Site Environmental Representatives, and Managers;
- Subscriptions to trade and industry journals, newsletters, etc.; and
- Subscriptions to Environment Essentials (EnviroLaw) updates.

4.2 Visy Tumut – Legal and Other Requirements

Approval of the staged development of the Visy Kraft Pulp and Paper mill (Stage 1) was granted in November 1998 under section 91AB (2) of the *Environment Planning and Assessment Act 1979*. This was granted subject to meeting the Development Consent Conditions under approval S96/00598. The subsequent Visy Tumut Mill Expansion Development (Stage 2) was granted under Part 3A in May 2007. This approval was granted subject to meeting the Concept and Project Approval Conditions under approval 06_0159.

The Visy Tumut Expansion Environmental Assessment for 700,000 (tpy) production was prepared and submitted to the Minister for Planning in February 2007 and approval was granted by the Minister in May 2007 pursuant to the provisions of Section 75J of the *Environmental Planning and Assessment Act 1979*. This approval was granted subject to Concept and Project Approval Conditions issued in Schedule 2 of the

approval dated 1 May 2007. Visy sought further modification to this approval in June 2007 (ref. Mod 2007) that considered Project Component Phasing Changes to Emission sources. The Project Component Phasing was approved under the Modification to the Instrument of Approval (06_0159 Mod 1) in August 2007.

Visy submitted a development modification application accompanied by an Environmental Assessment for the maximum production tonnage limit increase to the NSW Department of Planning & Environment in December 2016. Approval was granted on the 7 July 2017 subject to meeting conditions issued in Schedule 2 of PA 06_0159 Mod 3 and CP 06_0159 Mod 1 for the maximum production tonnage limit increase to 800,000 tonnes per year.

The statutory requirements and obligations which apply to the Tumut site are:

1. Documents as listed under Condition 1 of Development Consent Conditions for the initial development (S96/00598 DCC);
2. Additional documents as listed under Condition 2 of Development Consent Conditions for the modified development (S96/00598 DCC_ MOD -45-5-2003-1);
3. Environment Protection Licence (Licence No. 10232);
4. Documents as listed under Condition 1.1 of Project Approval Conditions for the Expansion (06_0159 PA);
5. Documents as listed under Condition 1.1 Concept Approval Conditions for the Expansion (06_0159 CA);
6. Statement of Commitment Stage 2 (April 2007); and
7. Documents as listed under Condition 1.1 Modification Approval for the Expansion (06_0159 Mod 1).

The main Environmental legislation governing operations at the site are listed below, and in addition specific legislation, regulations and standards relevant to the various environmental management plans are listed within the Environmental Management plans.

- *Environmental Planning and Assessment Amendment Act, 2017;*
- *Protection of the Environment Operations Act, 1997;*
- *Protection of the Environment Legislation Amendment Act, 2014;*
- *Waste Avoidance and Resource Recovery Act, 2001;*
- *Occupational Health and Safety (Dangerous Goods) Amendment Act, 2003;*
- *Threatened Species Conservation Act, 1995;*
- *Local Land services Act, 2013;*
- *Biodiversity Conservation Act, 2016;*
- *Visy Mill Facilitation Act, 1997;*
- *Water Management Act, 2000; and*
- *Water Act, 2007.*

The *Protection of the Environment Operations Act 1997* is the key piece of environmental protection legislation administered by the EPA to authorise the carrying out of scheduled activities at Visy Tumut. Under this legislation Visy are issued with an Environment Protection Licence (EP Licence No. 10232) to operate

subject to satisfying the various conditions of this Licence that includes air and water emission limits, waste received and disposal and requirements for monitoring and reporting.

The EP licence contains the requirements for monitoring, reporting and notification in the event of any incidents on site that may impact on the environment.

Specific Development and Project approval conditions detail obligations in relation to documentation of environmental management plans and associated reporting and auditing requirements.

5.0 Objectives, Targets and Management Program

5.1 Description

Corporate and site management programs involve defining overall objectives along with defined roles and responsibilities, necessary resources and timeframes by which they are achieved.

The objectives, targets and management programs must be measurable where practicable, and achievable and consistent with the Environment Policy. In setting the objectives and target, the following must be taken into account:

- Legal and other requirements;
- Significant environmental aspects and associated environmental impacts;
- Age and condition of plant and equipment;
- Prevention of pollution;
- Available technology and resources;
- Opportunity for cost savings through minimising environmental impacts;
- Overall business objectives; and
- The views of interested parties.

Each year, as part of business planning (i.e. April/May) and in conjunction with Divisional Managers, the Visy Corporate, Group Manager Safety and Environment develops a Bi-annual HSE Action Plan outlining the company's objective and targets. The Action Plan is set following Management Review and a summary of progress against them is communicated to the company through regular scorecards.

5.2 Site Objectives and Targets

The Site's Environmental Representative in consultation with the General Manager and other members of the management team will establish and document objectives, targets and an implementation program consistent with:

- The company Environment Policy;

- The Corporate and Divisional Objectives.

Targets should be specific, measurable, and achievable and have defined responsibilities and timeframes. Targets are to be included in the annual Environmental Compliance and Monitoring Report. Targets for 2022-23 are shown in Table 1 below.

Targets should be integrated with Performance Incentive programs and other business planning processes wherever possible.

The Site Environmental Representative is to report progress on objectives and targets to the Visy Corporate, Group Manager Safety and Environment and the Site General Manager on a monthly/quarterly basis for inclusion in regular scorecards.

Table 1.0 Visy Tumut Environmental Management Targets 2022-23

Environmental Performance Area		Key Result Areas	Target	Measure
1	Compliance	Ensure compliance with Development Consent Conditions	Reduction in non-compliances with Development Consent Conditions compared to the previous reporting period	Number of non-compliant Consent conditions as reported in Annual Report
		Ensure compliance with EPA Licence	Decrease in non-compliances with EPA licence conditions compared to the previous reporting period	Number of non-compliant Licence conditions and exceedance events in Annual Compliance Return submitted to EPA
		No fines, no prosecutions	No fines, no prosecutions	Number of fines and prosecutions
2	Production Efficiencies (Environmental)	Energy Use (Electricity)	Reduction	Kwh/tonne paper
		Natural Gas	Reduction	GJ/tonne paper
		Waste to landfill	Maintain or reduce rate	kg/tonne paper
		Water Use	Reduction	kL/tonne paper
3	Management System	Internal ISO14001 EMS Audit	Complete 1 internal EMS Audit	Internal EMS Audit completed
4	Air emissions	Minimise odour impacts off site	Reduce odour emissions and events that give rise to odour impacts	Number of odour complaints
5	Environmental Monitoring	Ensure all Monitoring is undertaken in accordance with EPA licence	No non-compliances related to CEMS data capture and analyser uptime	CEMS data capture and analyser uptime meets requirements
			Ensure sampling is undertaken as per schedule	% of monitoring intervals completed (of total number of intervals)

6.0 Resources, Roles, Responsibilities and Authority

6.1 Description

The Executive Chairman and Chief Executive Officer have ultimate responsibility for environmental management within Visy. They are responsible for establishing and maintaining effective environmental management systems which will ensure legal compliance, control of risks and demonstration of due diligence with regard to the environmental management.

The Corporate managers for Environment have been appointed by the Chief Executive Officer to:

- Work with site co-ordinators/ managers to ensure the environmental management systems are established, implemented, maintained and improved in accordance with the requirements of the relevant management plans and procedures.
- Report to top management on the performance of the management systems for review, including recommendations for improvement.

Divisional, Site and Functional Managers have a responsibility to ensure availability of resources for the management system to be effective at all times. Resources include human resources and specialised skills organisational structure, technology and financial resources.

6.2 Site Resources

The organisation chart for Visy Tumut can be found on the Visy People Connect system, under the Org Chart section. The General Manager at the site is responsible for the overall environment performance of the Tumut site. The management system must meet the requirements of the Visy Environment Policy, the site OEMP and associated procedures, standards and guidelines.

The Manufacturing Manager, Pulp and Paper Machine Managers have a responsibility for environmental performance of their respective areas and the implementation of specific items in the Environmental Management Plans. They are to also ensure Operational Personnel are trained in their responsibilities for implementing the environmental management plans.

The site's Environmental Representative(s) main role is to:

- Provide guidance on how the site is to meet the requirements of the Environment Policy and OEMP;
- Prepare reports on the site's environmental performance;
- Ensure all environmental monitoring and regulatory reporting requirements are undertaken;
- Attend periodic HSE and VCCC meetings;
- Communicate environmental management requirements to the site;
- Ensure EMS, management plans and procedures are reviewed and updated as required;
- Liaise on site issues with relevant regulatory authorities (i.e. Environment Protection Authority (EPA), Snowy Valleys Council (SVC) and Department of Planning & Environment (DPE)); and

- Follow up on Environmental Incidents and Complaints until closed out.

All employees and contractors have a responsibility to uphold the Visy Environment Policy. This is written into employee contracts, job descriptions, communicated to them through training, and inductions and assessed during performance reviews.

7.0 Competence, Training and Awareness

7.1 Description

Visy management is to ensure that all personnel involved in any operation, or providing services and products are competent to meet their environmental responsibilities.

The Corporate Managers for Environment and site Environmental representative are responsible for the implementation of a training program aimed at enhancing the awareness of Visy employees of environmental issues. The training program is to be developed in conjunction with the Divisional and General Managers and Human Resources.

7.2 Site Requirements

7.2.1 General Requirements

All employees, contractors and visitors are to be aware of relevant safety, health, environment and quality (SHEQ) requirements, hazards, risks and controls. They are to be competent to conduct their activities and behave in an appropriate manner without undue risk to the health and safety of people or to the environment.

All employees and permanent contractors must undergo induction in Visy corporate commitments to safety and the environment. Refresher training is to be undertaken every two years.

All employees, contractors and visitors are to undergo site general environmental and safety awareness training prior to commencing any work on site.

Area and task specific training is to be undertaken by all employees and contractors prior to work commencing.

7.2.2 Training Needs Analysis

A training needs analysis is to be undertaken by Pulp and Paper Mill Managers in consultation with the Human Resources, Environment and Safety representatives and is to be entered into the site's training matrix. Training is to be planned, documented and monitored and includes training in:

- Visy environment policy;
- Legal and other requirements;
- Significant environmental aspects;
- Environmental management plans;
- Pollution Incident Response Management (PIRM) Plan; and
- Emergency response plans.

The environmental and safety representatives are to ensure the training matrix is reviewed and updated as necessary. The Human resources representative is to ensure copies of actual training records are maintained.

8.0 Communication, Consultation and Motivation

8.1 Description

Environmental performance is a high priority across the company. Executive, Divisional and Site Management are responsible to communicate the importance of good environmental management as an integral component of Visy's core business.

A communication program has been developed to ensure and facilitate the involvement of all employees in the management of environmental issues and to provide information on Visy's environmental performance.

8.2 Internal Communication

The General Manager at Tumut is responsible for ensuring processes are in place for communicating the company's environmental expectations and performance to site employees, contractors and sub-contractors.

Senior Operators on each shift are to report any environmental incidents or complaints in accordance with *HOWTO-VPP-TUM-HSE-041 Environmental Incident Reporting HowTo* and *PROC-TUM-ENV-003 Environmental Complaint Response Procedure* in their shift logs. The Pulp and Paper Machine Operational Managers are to include Environment as an agenda item in the daily production meetings where environmental issues from previous shift/day are raised.

The Health, Safety and Environment (HSE) committee are to meet on a monthly basis and are responsible for communication of environmental and safety issues or initiatives to management, employees and contractors.

Senior site management are to meet with the Safety and Environmental representatives on a routine basis to review changes in legal or other requirements, safety and environmental performance and plan further actions/ initiatives to further enhance environmental and safety management.

Environmental communications that include alerts, HSE meeting minutes, scorecards, and other environmental communications are to be communicated via email and on the site's notice boards.

The environmental representative is to be consulted and updated on any changes to plant, equipment and processes through involvement in risk assessments and recording actions at Production or HSE Committee meetings.

8.3 External Communication

8.3.1 Visy Community Consultative Committee

The General Manager is responsible for ensuring support to the ongoing Visy participation in the Visy Community Consultative Committee.

The site's Environmental representative is responsible for ensuring:

- The Visy Community Consultative Committee is updated on the site's environmental performance;
- Issues raised by committee members are communicated back to Visy Divisional and site senior management; and
- Minutes of meetings recorded and distributed according to distribution list.

8.3.2 Regulators/Authorities

The site's Environmental Representative in consultation with the site's General Manager and the Visy Corporate, Group Manager Safety and Environment are responsible for the communication and reporting to the relevant regulators/authorities of the following:

- Significant environmental incidents and complaints in accordance with Visy Corporate Environmental Procedure 401 – *Incident and Near Miss Investigation and Reporting*;
- Site's Environment Protection Licence Annual Return;
- Annual Environmental Compliance and Monitoring Report;
- Quarterly Complaints Audit and Register;
- Annual National Pollutant Inventory;
- Annual Environmental Compliance Audit;
- 3 yearly Hazard Audits;
- Planned activities that may result in some impacts to local community; and
- Proposed changes to equipment, plant or operations that may require modifications to Development Approvals or EP Licence.

8.3.3 Other Stakeholders

Nearby Neighbours and Local Community Members - The site's Environmental Representative is responsible for communicating with nearby neighbours and local community members through emails, newsletters, mail-outs or verbally of issues or planned activities that may result in some impacts.

Snowy Valleys Council – The General Manager and/or site Environmental Representative is responsible for communicating the site's environmental performance to the Snowy Valleys Council.

Media – The site's General Manager in consultation with the Visy Corporate Public Affairs Manager and in accordance with the Visy Media Policy is responsible for all communications with the media.

9.0 Documentation

9.1 Description

The Visy Operational Environmental Management Plan provides the framework for environmental management at Tumut. The Tumut OEMP is consistent with the Visy Corporate Environmental Policy.

The documentation is maintained on Visy's IQMS server and the system co-ordinator is the Site Environmental Representative.

9.2 Requirements

The overall EMS documentation that forms the OEMP addresses the site's significant aspects and legal requirements. This document structure is illustrated in Figure 4 and is integrated with the mill's operations.

VISY ENVIRONMENTAL POLICY

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN

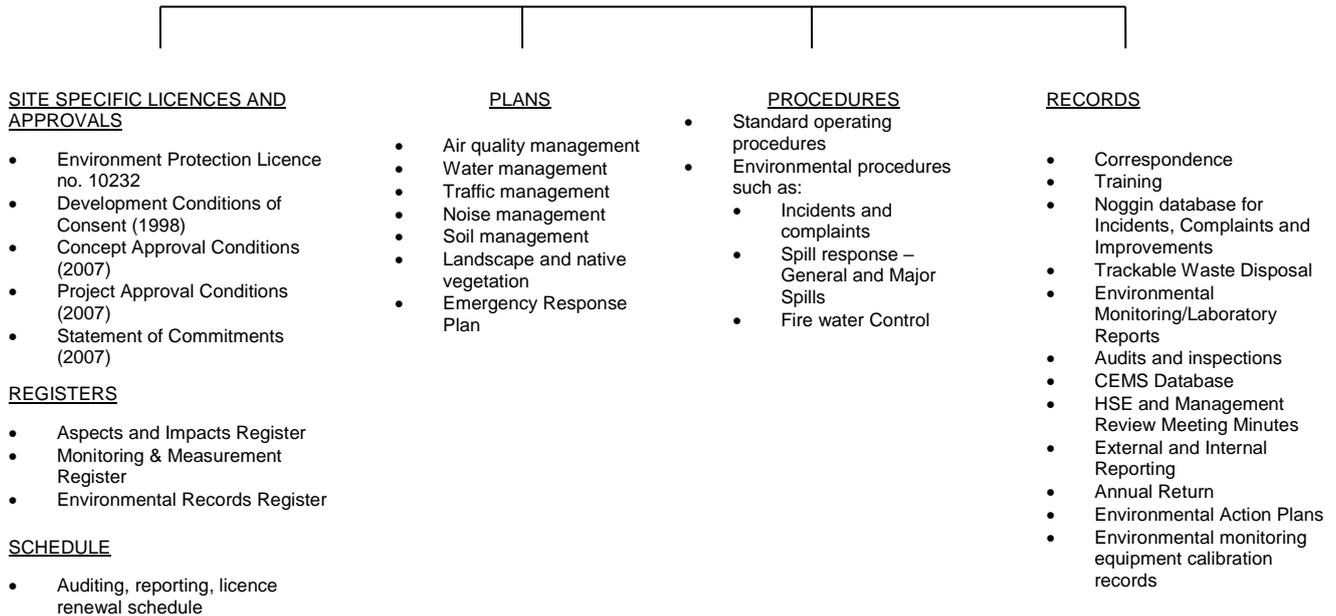


Figure 4.0 Environmental Management System Documentation Roadmap

10.0 Control of Documents

10.1 Description

Documents forming part of the OEMP are controlled in accordance with procedure *VP9-10-10.4-OP-003 Document and Data Control*. The purpose of the Document Control Procedure is to ensure that

- Documents are reviewed for adequacy prior to issue;
- Documents are reviewed, updated and re-approved prior to issuing for use;
- Changes and current revision status are identified;
- Applicable documents are available for point of use;
- Documents in use should remain legible and readily identifiable; and
- It should not be possible to use obsolete documents.

External documents (i.e. EP Licence, Development and Project Approval Conditions) are an integral part of the site's environmental management system and must be controlled.

The Site's Environmental Representative is responsible for maintaining document control.

11.0 Operational/Hazard Control

11.1 Description

Environmental risks (Aspects) can arise from activities, products, plants, equipment and services provided by Visy Tumut. Significant aspects and hazards require identification and operational controls such as engineering controls, control plans, procedures, work instructions or environmental management programs. Environmental Aspects and their impacts are assessed and prioritised in accordance with Visy Corporate Environmental Procedure 303 – *Environmental Risk Assessment*.

11.2 Requirements

The site's Environmental Aspects and Impacts including controls have been identified for each of the main process areas in consultation with the relevant Operational Engineers. These have been tabled in the site's Tumut Visy Corporate HSE Risk Register which also outlines the legal requirement, the level of risk and the control measures and emergency response measures that exist if the control measures fail.

The Environmental aspects of the relevant activities and the control measures are to be adequately and effectively communicated to all relevant personnel.

The Site HSE Manager is responsible for developing and maintaining the HSE Risk Register and to ensure it is reviewed periodically. The review shall include updating any changes to legislation, regulations, guidelines or standards and to site activities, products, plant, equipment and services. Control measures are also to be reviewed after any significant environmental incident has occurred.

12.0 Health and Hygiene

12.1 Description

The site is to be maintained in a clean and orderly manner for safety, environmental and presentation reasons.

Housekeeping and hazard audits are to be undertaken at regular intervals and issues raised/identified are to be acted upon as soon as possible.

In addition the following routine inspection programs are undertaken:

- Spill kits and trackable waste bins;
- Stormwater pits;
- Firefighting equipment (i.e. fire extinguishers, hydrants and hose reels, fire tanker);
- Fire hazard reduction; and
- Noise/hearing, hazardous substances, heat, lighting etc.

12.2 Responsibilities

The Manufacturing Manager is to ensure a housekeeping program has been implemented through-out all areas of the process.

The Shift Supervisors and Operations Personnel are to ensure the housekeeping program is being carried out and issues raised are being addressed.

The Operations Personnel are to carry out the housekeeping program.

The Environmental and Safety representatives are to ensure the additional routine inspection programs are undertaken and issues raised are being addressed.

13.0 Change Management

13.1 Description

When changes are to take place to Visy Tumut's activities, products and services the implications of these changes are to be assessed on the following:

- Environmental aspects and impacts;
- Site environmental licence and approvals;
- Development approval conditions; and
- All other relevant regulations and licences.

These considerations are to be made as part of the overall risk management approach.

In consideration of proposed changes consultation with relevant stakeholders as included below, may be required:

- Regulatory authorities (i.e. NSW DPE, NSW EPA, NSW RMS, SafeWork NSW etc);
- Council (i.e. Snowy Valleys Council);
- Community (i.e. VCCC, local Residents);
- Other stakeholder groups (i.e. State and Federal MP's, Green Groups etc).

13.2 Site Requirements

The General/Manufacturing Manager is to ensure a risk assessment has been completed for all new plant or equipment or changes to processes.

The Site Environmental Representative is to ensure if required, that:

- All relevant environmental and development approvals relevant to the proposed changes are obtained;
- HSE Risk Register is reviewed and updated;
- Environmental management plans and procedures are updated; and
- In collaboration with the Site's General Manager and the Visy Corporate, Group Manager Safety and Environment, consultation with the appropriate regulators, councils, and local community is undertaken.

14.0 Contractor Management

14.1 Description

All contractors prior to performing any work on the Visy Tumut site will be provided with the Visy Contractor Pack. The Contractor Pack covers many important issues and aspects of Visy's safety, environment, property, public liability, security, emergency management, human resources and quality. The contractor and their employees will also complete an online Site Specific Induction that covers Visy's Environmental and Safety Policies and site specific procedures and risk associated with the tasks to be performed.

The Contractor shall ensure that all employees engaged on the Works are competent to carry out the work required of them and that they hold all necessary certificates or licences in accordance with the appropriate State or Territory legislation and regulations.

14.2 Site Requirements

All contractors required to perform work on site must ensure that employees have appropriate training and licences to perform the work. Task specific risk assessments, Job Safety and Environmental Assessment (JSEA) in accordance with Visy Corporate Environmental Procedure 307 – *Completing a JSEA* are to be undertaken by the contractor prior to commencement of work. All employees undertaking the task are to sign the *JSEA* as acknowledgement that they are aware of the risks and have been trained in the controls. The contractor is to submit the job specific *JSEA* with the application for a Work Permit to the designated Visy representative.

VPP Management and Contractor management are to ensure appropriate supervision is provided for the work being undertaken. Supervision includes:

- All permits are completed, communicated to the contractor and operational personnel as required and signed prior to commencement of work;
- Monitoring safety and environmental performance;
- Monitoring performance of contractor to ensure legal requirements are being met;
- Ensure regular site inspections are conducted;
- Advising contractors of non-conformances (if any);
- Monitoring and follow up on corrective action;

- On completion, work area to be inspected and work permit and other relevant documents should be signed off if found to be acceptable; and
- Ensure all contractor records are maintained.

15.0 Emergency Preparedness and Response

15.1 Description

In order for Visy to effectively respond to emergency situations, plans, procedures and trained personnel need to be in place to:

- Identify potential emergency scenarios, including their environmental implications;
- To plan an appropriate response for mitigating and addressing any negative environmental impacts that may be associated with them;
- To plan an appropriate response for reducing the risk injury or illness to employees; and
- To periodically test and review response to emergency situation.

15.2 Site Requirements

The Emergency Response Plan has been prepared for the site which defines:

- Potential emergency situations and scenarios;
- Roles and responsibilities for emergency control organisation, employees and contractors;
- Procedures for dealing with various emergency scenarios;
- Requirements for internal and external communications in event of an emergency scenario occurring; and
- Emergency response drills and training requirements.

The Emergency Response Plan is to be reviewed by the site's Safety and Environmental Representatives as follows:

- Periodically every 12 months;
- After any emergency situation or; and
- After each emergency response training drill.

The Pollution Incident Response Management Plan (PIRMP) has been prepared for site and defines:

- Potential pollution incident situations and scenarios;
- Roles and responsibilities for the activation, notification and management of the PIRMP
- Requirements for the notification of relevant external authorities
- PIRMP training requirements

The Pollution Incident Response Management Plan (PIRMP) is to be reviewed by the relevant personnel on site as follows:

- Periodically every 12 months;
- After any pollution situation or; and
- After each PIRMP training drill.

16.0 Monitoring and Measurement

16.1 Description

A monitoring program has been developed to ensure Visy Pulp and Paper Tumut:

- Complies with its legal obligations;
- Complies with Visy Environment policies and corporate procedures;
- Risk controls are in place and effective and or;
- Making progress against objectives and targets; and
- Having no adverse impact on the Environment.

Visy Tumut site includes the following corporate requirements in the monitoring program:

- Recording and reporting of environmental incidents and complaints in the Visy Noggin system;
- Monthly usage of energy, water, production of solid and liquid wastes; and
- National Pollutant Inventory.

The corporate environmental monitoring program is documented in the following procedures:

- Procedure 205-0 – *Environmental Performance, Measurement and Reporting*; and
- Procedure 1102 – *HSE Audit System*.

The Visy Environmental Representative is responsible for the implementation and maintaining this program.

16.2 Site Requirements

The site monitoring and measurement program incorporates the following legal requirements:

Development Consent approval conditions (1998);

- Concept and Project Approval conditions (2007);
- Statement of Environmental Effects;
- Environment Protection Licence conditions;
- National Pollutant Inventory; and
- Load Base Licence requirements.

The monitoring program at Tumut is described in detail in the site Environmental Management Plans (air quality, water etc. and incorporated into *POLC-TUM-ENV-001 Monitoring and Measurement Procedure*. The monitoring schedule is updated by the Site Environmental Representative on an annual basis.

17.0 Evaluation of Compliance

17.1 Description

The site is to be evaluated on a periodic basis to ensure compliance with all applicable regulatory and other requirements to which the company subscribes. Records of review are to be kept on file.

The evaluation should be carried out through internal and external audits and should be incorporated into the site's environmental management system. Periodic reviews are to be done in accordance with Visy Corporate Environmental Procedure 1001 – *Managing Legal Compliance* and in accordance with VP9-10.10.3-OP-001 *Legal Compliance Review*.

17.2 Responsibilities

It is the responsibility of the site's Environmental Representative to undertake and co-ordinate the Legal Compliance Reviews. The audit program is to be included and tracked in the Noggin Audit Schedule located in the Organiser section. This is to be updated each year. Results of audits are to be communicated to Senior Managers and any agreed actions or recommendations included in Noggin system in the audit findings section.

All records of reviews and evaluations are to be maintained.

18.0 Incident Investigation, Non-Conformity, Corrective and Preventative Action

18.1 Description

All Environmental Incidents and Complaints are to be investigated in accordance with procedure *HOWTO-VPP-TUM-HSE-041 Environmental Incident Reporting How To*. The investigation is to be conducted to:

- identify non-conformances;
- investigate and determine causes of the non-conformance;
- implement interim preventative measures;
- identify and implement longer term corrective and preventative measures to avoid recurrence;
- allocate responsibilities and deadline dates for completion;
- review effectiveness of corrective actions;
- all incidents and complaints are to be reported to corporate through the Visy Noggin system for statistics, tracking and reporting purposes as specified in Procedure 401 – *Incident and Near Miss Investigation and Reporting*; and
- Report serious incidents/complaints to NSW EPA and DPIE in accordance with regulatory requirements and *HOWTO-VPP-TUM-HSE-041 Environmental Incident Reporting How To* and *PROC-TUM-ENV-003 Environmental Complaint Response Procedure*.

An email summarising any incident and complaint once entered into the electronic Noggin system will be automatically generated and distributed to senior site, divisional and corporate managers.

18.2 Responsibilities

It's everyone's responsibility to report any environmental incidents and complaints.

All Environmental Incidents and Complaints are to be reported to the Pulp mill or Paper Machine Shift Supervisors immediately. The Pulp mill or Paper Machine Shift Supervisors are responsible for:

- Co-ordinating any immediate response required to bring the incident under control;
- Investigation and reporting of incident onto the Noggin system;
- Chief Wardens are to activate the Pollution Incident Response Management Plan; and
- Immediately notifying the Senior Production Manager and/or Environmental Representative of any serious environmental incident or complaints.

It's the responsibility of the Senior Production Managers to:

- Ensure a thorough investigation is undertaken into the cause of the non-conformance;
- In consultation with the site's Environmental Representative identify preventative and corrective actions to prevent recurrence; and
- Ensure specific tasks are identified and entered into the work-order system, resources are allocated, timelines set for completing actions and follow up review to ensure corrective actions have been effective.

It's the Site Environmental Representative's responsibility to ensure:

- Effectiveness of the incident/complaints system through quarterly reviews;
- Incidents and complaints are properly investigated and documented in the Noggin system;
- Corrective actions are identified and implemented;
- Effectiveness of corrective actions;
- Final close out of incident and complaint;
- Activation, notification and management of the Pollution Incident Response Management Plan;
- Reporting of serious incidents and complaints to the relevant authorities;
- In consultation with the General Manager, responding to any issues/concerns raised by relevant authorities into any incident or complaint; and
- Follow up of any environmental complaints from the local community.

19.0 Control of Records

19.1 Description

Appropriate records are to be maintained in order to demonstrate compliance with requirements of the Visy Environment Policy, conformity with legal and other requirements and with minimum requirements of the Environmental Management System.

Environmental records shall include but not be limited to:

- Compliance requirements (i.e. licences, environmental impact studies/assessments, development and project approval conditions, regulations, agreements, permits, standards, guidelines, codes of practice etc.);
- Correspondence with authorities (i.e. EPA, DPE, SVC etc.);
- Environmental aspects and impacts register;
- Training register;
- Incident records;
- Complaints records;
- Emissions and waste disposal records;
- Maintenance, testing and calibration records;
- Audits and inspections; and
- Meeting minutes and management review.

19.2 Responsibilities

The site's Environmental Representative is responsible for ensuring:

- That there are procedures for the control of environmental records which demonstrate the site's compliance with its environmental standards and policy requirements and the effective operation of the management system;
- Records are maintained for specified periods depending upon contractual, legal, regulatory or commercial requirements, but not less than four years. These records may be kept electronically if permitted by relevant authorities; and
- Storage and disposal of records in accordance with procedure VP9-10-10.5-OP-004 *Records Procedure*.

20.0 Internal and External Audits

20.1 Description

Periodic system and compliance audits are conducted in order to ensure that the management system has been properly implemented and has been effective in improving environmental performance and legislative compliance.

The Internal and External Audit program are undertaken in accordance with:

- Visy Corporate Environmental Procedure 1102 – *HSE Audit System*;
- Development Approval Condition no. 71;
- Project Approval Conditions. 3.14, 3.15 and 3.16; and
- EMS certification audits in accordance with ISO 14001.

Key findings from audits are reported to Corporate, Divisional and Site Senior Management and retained as a system performance record.

20.2 Responsibilities

The Visy Corporate, Group Manager Safety and Environment is responsible for implementing the Internal Cross site audits across all sites.

The site's General Manager is responsible for ensuring the internal and external auditing program is developed and implemented to meet the objectives of the management system at Visy Tumut.

The site's Environmental Representative is responsible for:

- Co-ordinating the site's auditing program;
- Reporting of key findings;
- Developing corrective action plans in consultation with the General Manager; and
- Retention of audit records.

21.0 Management Review

21.1 Description

Management Review is undertaken in the following various forms:

- Review of environmental incidents, complaints and environmental performance at daily production meetings;
- Monthly reporting of environmental performance to senior site, divisional and corporate management;

- Annual corporate management review of companies environmental management system;
- Annual site management review of sites environmental management system;
- HSE Committee meetings;
- Visy Community Consultative Committee meetings; and
- Annual Environmental Compliance/Performance reporting and Annual Returns.

The documented Management Review of the corporate and site's environmental management systems, undertaken annually, considers as a minimum:

- Results of internal and external audits and evaluations of compliance with legal and other requirements;
- Communications from external interested parties including complaints;
- Environmental performance;
- Significant incidents that have occurred;
- The extent to which annual objectives and targets are met;
- The status of corrective and preventative actions;
- Follow up from previous management reviews;
- Changes that include plant, equipment, operations, regulations, legislation related to environmental aspects; and
- Recommendations for improvements.

21.2 Responsibilities

The Visy Corporate, Group Manager Safety and Environment is responsible for:

- Undertaking the Corporate Management Review program;
- Communicating results of Management Review to all sites;
- Developing and implementing actions plans from Management Review process; and
- Maintaining records of management review process.

The site's General Manager is responsible for:

- Ensuring management review program is developed and implemented including as a minimum a formal annual Management Review meeting involving the Senior Site Management team;
- Communicating results of management review to relevant parties; and

- Developing and implementing action plans from Management Review Program.

The site's Environmental Representative is responsible for:

- Co-ordination of management review program; and
- Maintaining records of management review process.