



**KIMBERLEY
PORTS**
AUTHORITY

**ENVIRONMENTAL MANAGEMENT
PLAN**

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VARIATION RECORD:

Version No.	Version Date:	Brief Description of Change:
	March 2004	Revision
	May 2008	Revision
	June 2009	Revision (supplementary EMP)
6.0	December 2010	Revision
7.0	September 2013	Revision incorporating new EMS and 2009 Supplementary EMP
7.1	November 2014	Revision incorporating KPA name and logo change, and minor edits.
8	December 2015	Full revision of document. Aligning the EMP as a strategic document within KPA's EMS.
8.1	December 2016	Review of document, inclusion of abbreviations page, updates made to risk table and minor changes throughout document.

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LIST OF ABBREVIATIONS

EMP:	Environmental Management Plan
EMS:	Environmental Management System
ERP:	Emergency Response Plan
KPA:	Kimberley Ports Authority
MOPCP:	Marine Oil Pollution Contingency Plan
MSP:	Marine Safety Plan
OHSMS:	Occupational Health and Safety Management System
PMA	Port Management Area
SWASP:	State Wide Array Surveillance Program
TEMR's:	Tenant Environmental Management Requirements

1. INTRODUCTION

Following a review of Western Australian ports in 2012, the Broome Port Authority became the Kimberley Ports Authority (**KPA**) on 1 July 2014. KPA currently has responsibility for the Port of Broome and the Port of Browse. KPA may have responsibility for the Ports of Derby and Yampi Sound in 2017, and the Port of Wyndham in 2017 at the earliest and 2019 at the latest.

Under the *Port Authorities Act 1999* (the **Act**), KPA has a duty to act on commercial principles and perform defined functions, including the:

- facilitation of trade and planning for future growth and development of the port for the economic benefit of the State;
- control of operations and business of the port and the power to hold and dispose of assets and enter into commercial arrangements;
- safe and efficient operation of the port;
- maintenance and preservation of property vested in the port; and
- protection of the port environment and minimisation of the impact of port activities on that environment.

KPA has an Environmental Management System (**EMS**) and this Environmental Management Plan (**EMP**) is a key component as it outlines the scope of KPA's environmental management for its current port and links with other KPA systems and processes. In addition, the EMP provides a framework for future ports to be included in the plan as they are amalgamated into KPA.

A port authority must annually prepare and submit to the responsible Minister a strategic development plan for the port authority and any subsidiary documentation. The strategic development plan requires an EMP for the port authority. The EMP is a "live" document that will address new activities that may arise and incorporate any legislative changes or best practice conditions which may evolve from time to time.

The purpose of this EMP is to:

- define the scope of KPA's environmental management role and responsibilities;
- outline how KPA identifies and manages the risks associated with its activities and serves to minimise the impact to the surrounding port environment;
- provide an overview of the significant environmental risks and key treatment plans that will address these risks;
- outline KPA's environmental objectives and targets;
- provide a framework for ensuring KPA's environmental performance is continuously and systematically improved; and

- provide an overview of how environmental management at KPA is undertaken, how it integrates with other KPA systems and process, and provide references to relevant documentation where required.

1.1. KPA Ports

With the port reform process, KPA inherits extended responsibilities for environmental management in a region that is internationally recognised as having significant environmental values. KPA has carried out a due diligence on the Ports of Wyndham, Derby and Yampi Sound to gain an understanding of the specific ecological, heritage and biodiversity values at these Ports, as well as ascertain the environmental management systems that are in place. When these ports are amalgamated with KPA they will be addressed in KPA's EMS and this EMP.

1.1.1. Port of Broome

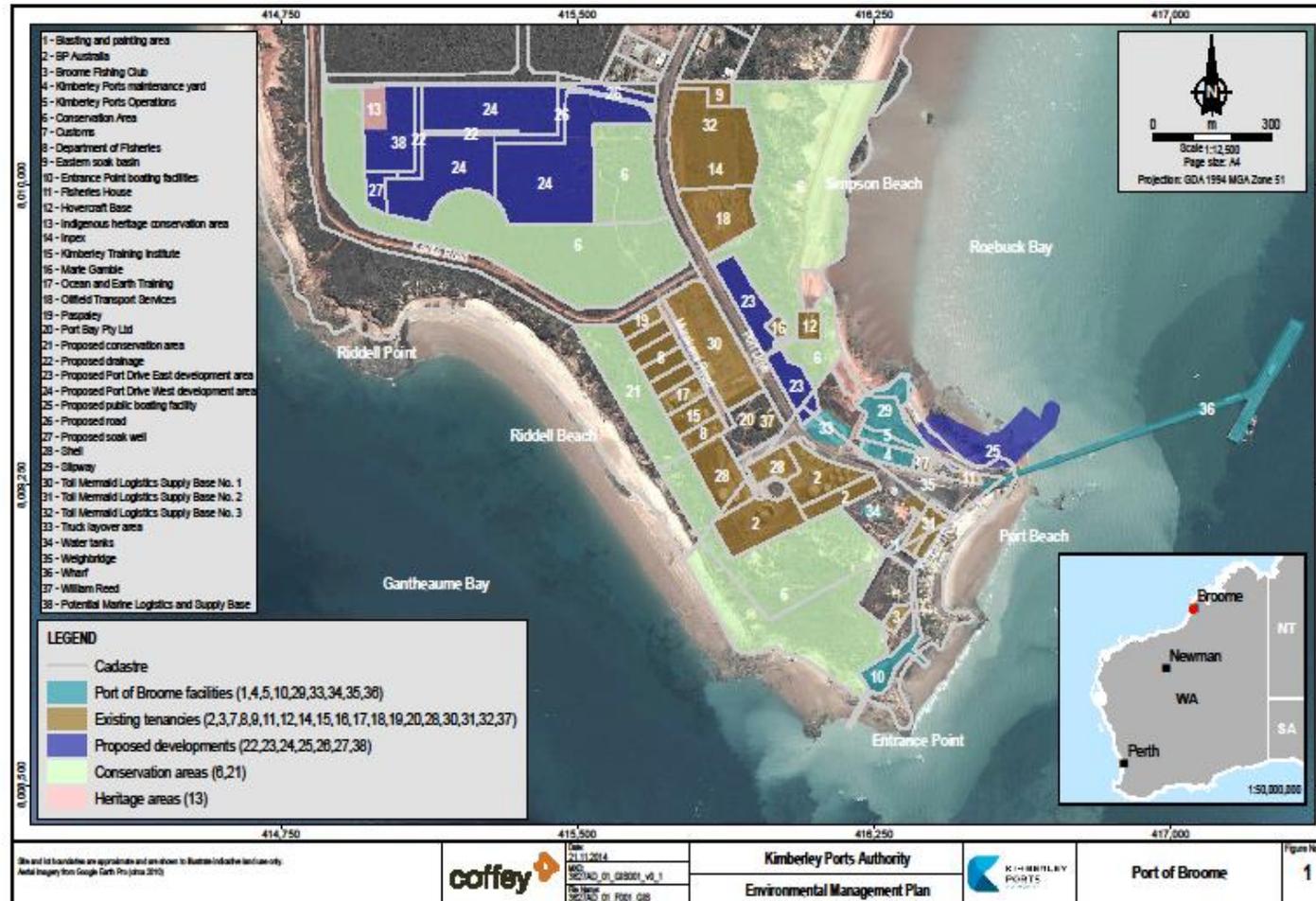
The Port of Broome is a busy deepwater port that has serviced the Kimberley region since 1889 and is located at the southern tip of the Dampier Peninsula. The port supports Broome's pearling fleet as well as offshore oil and gas exploration supply vessels, oil tankers, livestock carriers, breakbulk or general cargo vessels, fishing vessels, charter boats, cruise liners, private vessels and Navy and Customs patrol vessels. The port is the main fuel and container hub port for the Kimberley region, and in recent years its principal exports have been livestock and offshore drilling rig equipment and materials. A steel pile jetty extends from the peninsula in an easterly direction, reaching the deeper waters of the Inner Anchorage within Roebuck Bay. This jetty is the main berthing facility for the region.

KPA has a strategically located land holding that is set aside for port related developments. Land is leased to tenants for a variety of purposes including an oil tank farm, aquaculture industries, training facilities, offshore supply bases, fishing club, hovercraft base and residential use. A portion of land within the PMA is utilised for port related uses by the KPA, a portion is leased to tenants, whilst the greater remainder is vacant. Port of Broome lands are shown in Figure 1.

KPA is currently charged with the role of overall management of the Port of Broome. This involves financial aspects, strategic planning, forecasting and development. In addition, the Port of Broome differs from many other Western Australian Ports in that the majority of day-to-day port activities (such as pilotage, stevedoring, navigation aid maintenance, anchorages, moorings, communications, channel maintenance, towage, cargo loading and discharge) are conducted in-house or otherwise arranged by KPA.

KPA is also responsible for strategically planning and coordinating the optimum overall development of the Port of Broome. This function involves identifying suitable physical resources (e.g. land, deep water) available for future use and forecasting marine traffic, trade and future land use requirements.

Figure 1 Port of Broome



2. ENVIRONMENTAL MANAGEMENT

2.1. KPA Environmental Management System

KPA has an Environmental Management System (**EMS**) in accordance with the requirements of ISO 14001:2004. With the release of AS/NZS ISO 14001: 2016, KPA will be reviewing and updating its EMS to ensure compliance with this new standard.

KPA's EMS incorporates policies, planning, procedures, practices, responsibilities, training, monitoring, review and audits that together define the framework for managing the impact of KPA's activities, products and services on the environment. The EMS is currently focussed on Port of Broome. The elements of the EMS discussed in this EMP are primarily for Port of Broome and will be updated and expanded to include other ports as these become amalgamated with KPA.

In addition to KPA's EMS and supporting suite of documents, KPA has other systems, plans and procedures which support environmental management, including:

- Port of Broome Occupational Health and Safety Management System (**OHSMS**);
- Port of Broome Marine Safety Plan (**MSP**);
- Port of Broome Emergency Response Plan (**ERP**);
- Port of Broome Cyclone Contingency Plan; and
- Port of Broome Marine Oil Pollution Contingency Plan (**MOPCP**).

2.2. KPA Environmental Policy

The Port recognises that the protection of the environment is a key business performance objective. The key principles of KPA's environmental policy are to:

- a) comply fully with all laws, regulations and standards with respect to the environment, apply responsible standards where legislation and regulations do not exist and require similar performance by all parties active on KPA lands and the wharf;
- b) integrate environmental management requirements into our business objectives and provide adequate resources to support our environmental strategies;
- c) continually improve our environmental performance and minimise environmental impacts across our operations, both land and marine side;
- d) ensure that our employees, contractors and port users are aware of their responsibilities relating to the environment and comply with KPA's procedures;
- e) work with KPA tenants to identify and manage environmental aspects associated with their operation;
- f) implement appropriate environmental monitoring programs to assist in minimising environmental impact from Port activities;
- g) incorporate pollution prevention practices into our operating procedures and processes; and
- h) respect ecological, heritage and biodiversity values.

2.3. Scope of Environmental Management

KPA's Port of Broome port management area (**PMA**) incorporates both marine and landside areas and includes port and non-port related activities. These activities are undertaken by a range of

different parties including KPA, contractors, agents, port users, tenants and members of the public. KPA site activities can be categorised into three general areas:

- a) activities and services that are managed by KPA;
- b) port related activities that are undertaken by other parties; and
- c) activities undertaken by tenants or contractors.

Taking into consideration the types of activities undertaken in KPA's PMA, the environmental management control KPA has is one of three types:

- **Operational Control** – where KPA has full operational control of an activity, facility or project and the environmental responsibility lies with KPA;
- **Commercial Control** – where KPA has a commercial agreement allowing another party to carry out activities on KPA lands, facilities, sea bed or water areas, for example a lease, contract, permit or licence; and
- **Regulatory Control:** this applies to port users and members of the public accessing port lands where KPA has a regulatory role to fulfil its obligations under the *Port Authorities Act*.

2.4. Environmental Management Plan

This EMP forms part of the EMS and follows the structure of ISO 14001 to demonstrate how KPA manages its operations to minimise risk to the environment.

3. PLANNING

3.1. Regulatory Obligations

A key policy objective of KPA is to comply with environmental legislation. KPA has obligations under various State and Commonwealth legislation, plus a duty of care under common law to protect the PMA environment from foreseeable risks.

KPA has a register of legal and other requirements containing primary environmental laws, regulations and standards relevant to its operations. KPA's *Legal and Other Requirements Procedure* outlines processes to ensure KPA takes account of legislative changes and amendments that occur from time to time so that KPA can continue to achieve its compliance policy objective. The procedure also outlines the review and audit of the legislation register.

Some of the key legislation relating to KPA's operations include, but are not limited to:

State

- *Environmental Protection Act 1986*
- *Environmental Protection Regulations 1987*
- *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*
- *Environmental Protection (Unauthorised Discharge) Regulations 2004*

Commonwealth

- *Environmental Protection and Biodiversity Conservation Act 1999*
- *Environment Protection (Sea Dumping) Act 1981*

3.2. Environmental Risk Management

Port operations and activities, by their nature, have the potential to impact upon one or more aspects of the natural or social environment. KPA has a *Risk Management Policy* and *Risk Management Procedure* which outlines how it identifies, assesses and controls risks, including environment risks.

KPA has three risk assessment levels:

- Strategic Level;
- Operational Level; and
- Project Level.

As outlined in KPA's *Risk Management Procedure*, KPA records its risks in an online risk management system.

The identification of environmental and heritage risks carries some additional requirements as part of the EMS. The EMS standard, AS/NZS ISO 14001:2004, requires the systematic identification and assessment of environmental **aspects** and **impacts** – i.e., activities under the control or influence of KPA that could have an effect on the environment as well as those potential environmental effects. Accordingly, the *Environmental Aspects and Impacts Procedure* prescribes how KPA's

environmental aspects and impacts are to be identified, with the results being recorded in the *Environmental Aspects and Impacts Register* as well as being reflected in KPA's online management system. The register demonstrates that all environmental aspects and impacts have been identified and captured. Information from the register can then be used to inform KPA's risk identification process and be included in KPA's online risk management system. In line with the *Environmental Aspects and Impacts Procedure*, significant environmental risks are those which are rated with a risk score high or greater, or are otherwise a management concern for KPA. The significant environmental risks are identified in Table 1.

3.2.1. Methodology

As described in the *Risk Management Procedure*, the method used for prioritising environmental impacts is based on the concept that the significance of the environmental issue is a combination of the negative consequence and the likelihood of that negative consequence occurring: Hence the relationship: Risk = Consequence x Likelihood.

Key environmental issues have been analysed and ranked to provide a mechanism for identifying and managing high priority environmental issues before attention is given to issues of a lower priority. Current policies and procedures for environmental management are taken into account when assessing likelihood and consequence of possible adverse outcome.

Evaluation of the significance of an environmental issue can be facilitated by consideration of a number of factors (AS/NZS ISO 14004:1996):

- a) duration of impact;
- b) long-term sustainability;
- c) probability of occurrence;
- d) cost of changing the impact;
- e) scale and severity of impact;
- f) concerns of interested parties;
- g) potential regulatory and legal exposure;
- h) difficulty of changing or removing the impact;
- i) effects on the public perception of the Authority; and
- j) effect of change on other activities and processes.

Table 1 Overview of KPA's Significant Environmental Risks

Risk Description	Cause	Resulting In	Consequence Category	Inherent Risk			Controls (already in place)	TAPS (to be implemented)	Residual Risk		
				C	L	R			C	L	R
Release of product to the environment	Uncontrolled release of a product within the PMA that enters the marine or terrestrial environment.	<ul style="list-style-type: none"> Toxicity and smothering of marine biota from spilled product; Damage destruction of marine habitat; Reduction in water quality from nutrients and suspended solids. Contamination of soil and potentially groundwater. Reduction in air quality. 	Environment	5	3	15	<ul style="list-style-type: none"> Port and Terminal Handbook Commercial leases Formalised procedure in place for port user bunkering of low flash point fuels Contractors Handbook KPA HSE and Security Induction KPA EMS including SOP's, JHA's and Permit to Work System. CCTV Audits and inspection program Maintenance program 	<ul style="list-style-type: none"> Ongoing audit and inspection program 	5	2	10
Cumulative loss of environmental values	Failure to adequately monitor the environment.	Degradation of environmental values (eg water quality, sediment quality, seagrass health)	Environment	4	3	12	<ul style="list-style-type: none"> Groundwater monitoring Marine Baseline Program completed in 2016 Invasive Marine Pest Species monitoring 	<ul style="list-style-type: none"> Ongoing marine monitoring program for the Port of Broome 	4	2	8

Risk Description	Cause	Resulting In	Consequence Category	Inherent Risk			Controls (already in place)	TAPS (to be implemented)	Residual Risk		
				C	L	R			C	L	R
							<ul style="list-style-type: none"> Workplace inspections 				
Failure to manage existing contaminated sites	Unknown extent of contamination or ongoing contamination of a site.	Adverse impact on land or marine environments.	Environment	5	3	15	<ul style="list-style-type: none"> Tenant Environmental Management Requirements Slipway Terms and Conditions Slipway Contaminated Sites Management Plan HSE Slipway Guidelines Commercial Leases Permit to Work System Regular inspections of the Slipway 	<ul style="list-style-type: none"> Ongoing inspections of the site 	5	2	10
Failure to ensure tenants effectively manage their environmental impacts	Tenant activities not carried out with environmental management plans, appropriate licences, emergency response plans or approvals, or	Adverse impact on land or marine environments	Environment	4	3	12	<ul style="list-style-type: none"> Commercial Lease Tenant environmental Management Requirements Tenant Inspections 	<ul style="list-style-type: none"> Ongoing audits and inspections 	4	2	8

Risk Description	Cause	Resulting In	Consequence Category	Inherent Risk			Controls (already in place)	TAPS (to be implemented)	Residual Risk		
				C	L	R			C	L	R
	by appropriately trained and qualified personnel.										
Failure to ensure contractors manage their environmental impacts when undertaking the work within the PMA	Use of contractors with poor site knowledge and lack of understanding of the potential adverse environmental outcomes of their operations.	Adverse impact on land or marine environments	Environment	4	3	12	<ul style="list-style-type: none"> • Contracts with KPA contractors • Contractor Handbook • KPA HSE and Security Induction • Port Standards and Conditions 	<ul style="list-style-type: none"> • Ongoing inspection and monitoring. 	4	2	8
Failure to ensure port users manage their environmental impacts on port lands.	Port users undertaking unauthorised activities or undertaking activities without an adequate environmental risk assessment	Adverse impact on land or marine environments	Environment	5	3	15	<ul style="list-style-type: none"> • Port Standards and Conditions • Slipway Terms and Conditions • Port user obligations to undertake activities in compliance with relevant environmental legislation. 	<ul style="list-style-type: none"> • Ongoing inspection and monitoring. 	5	2	10

Notes: L = likelihood, C = consequence and R = risk.

3.3. Objectives, Targets and Programs

Environmental objectives are environmental goals which are consistent with KPA's Environment Policy. An environmental target is a detailed performance requirement that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives. Environmental targets are aligned with significant environmental aspects and should be quantifiable where practicable.

The process for setting and reviewing objectives and targets is detailed in the *Objectives and Targets Procedure*.

KPA's strategic environmental objective as set out in the KPA Strategic Development Plan 2017/22 is to seek the balance between Sustainability and Economic Growth.

KPA's strategy of "seeking the balance between sustainability and economic growth" encompasses all facets of the organisation and environment in which it operates, including the port operations, stakeholder (industry, government, community, traditional owners etc.) needs, planning and development needs, management and maintenance of assets, physical environment, and environment and heritage values of the Port and surrounding areas.

KPA will play an increasing role planning for the region, to ensure the growth is planned, sustainable and recognises the needs of the KPA's customers and key stakeholders. This will be achieved through:

- developing a master plan for the Port of Broome and a wider strategy for all Kimberley Ports;
- maintaining Port of Broome environmental management systems (EMS) in line with AS/NZS ISO 140001;
- establishing a program for future ports that are amalgamated into KPA to ensure their EMS's align with AS/NZS ISO 140001 and KPA's EMS;
- aligning environmental monitoring programs to support commercial and operational future developments; and
- incorporating coastal vulnerability and climate change considerations into KPA development strategies.

4. IMPLEMENTATION AND OPERATION

The key to successfully reducing environmental impact from daily port operations is proper implementation of environmental management procedures. To ensure effective implementation, KPA will:

- a) communicate relevant aspects of KPA's EMS and EMP to employees, contractors, port users and tenants;
- b) train relevant personnel on their implementation responsibilities;
- c) make environmental considerations an integral part of the port's decision making process (including development and expansion);
- d) include environmental policies in leases and contracts; and
- e) regularly inspect, review and audit port operations to ensure environmental procedures are implemented and being complied with.

4.1. Resources, Roles, Responsibility and Authority

Various positions in KPA have defined roles, responsibilities and authorities for managing environmental aspects, risk treatment action plans, programs and controls. In addition, EMS procedures define the responsibilities of certain KPA positions associated with the relevant procedure.

4.2. Training

The process for identifying induction, training and competency requirements of employees, contractors and visitors is detailed in the *Environment Induction, Training and Competency Procedure*.

General awareness of KPA's EMS is provided during inductions for Port of Broome employees, contractors and visitors. More in-depth training on the EMS or particular environmental issues may be provided to relevant personnel, e.g. for those undertaking a specific activity or who have specific EMS responsibilities.

4.3. Communication

The process for communicating KPA's EMS is detailed in the *Environment Internal and External Communications Procedure*.

Information about the EMS and this EMP is disseminated to KPA employees and contractors during Port of Broome inductions, as part of training, on noticeboards and on the KPA internet site. This EMP is available on KPA's website.

4.4. Documents and Records

Elements of the EMS are shared with other KPA management systems. For example, KPA has many Safe/Standard Operational Procedures (SOPs) and job hazard analysis (JHA), which prescribe the way that employees and contractors must carry out specific activities at the Port of Broome. While SOPs are primarily an Occupational Safety and Health (OSH) system document to

ensure a consistent and risk-assessed approach to completing certain activities in a safe manner, the SOPs may also prescribe measures relating to the environmental management of KPA activities, products and services.

4.5. Operational Control

As discussed in Section 3 of this EMP, the environmental management control KPA has is one of three types:

- **Direct Control** – where KPA has full operational control of an activity, facility or project and the environmental responsibility lies with KPA;
- **Commercial Control** – where KPA has a commercial agreement allowing another party to carry out activities on KPA lands, facilities, sea bed or water areas, for example a lease, contract, permit or licence; and
- **Regulatory Control:** this applies to port users and members of the public accessing port lands where KPA has a regulatory role to fulfil its obligations under the *Port Authorities Act*.

4.5.1. Direct Control

KPA manages the environmental risks associated with activities under its direct control at the Port of Broome through a variety of controls including, but not limited to:

- KPA HSE and Security Induction – this is undertaken by all KPA employees, contractors and port users who require access to the wharf;
- KPA's inspection and audit program;
- SOP's and JHA's which outline specific environmental controls or guidelines specific to the activity being undertaken;
- Permit to work system;
- Marine Safety Plan;
- CCTV;
- Emergency response plans and equipment;
- Maintenance plans and schedules;
- Contractors Handbook;
- Port Standards & Procedures; and
- Port and Terminal Handbook.

4.5.2. Commercial Control -

In regards to commercial control, KPA manages the environmental risks associated with Port of Broome tenant and contractor activities in a variety of ways.

As separate business entities, tenants have the primary individual responsibility to ensure that their activities meet environmental regulatory requirements. Allocation of environmental risk is important as KPA may have to carry the cost of remediation and environmental contamination caused by tenant activities. Mechanisms available to KPA to define the environmental responsibilities of tenants include:

- a) leases – a legally binding contract to define the terms of the relationship;
- b) Port standards and procedures – requirements and guidelines developed by KPA or jointly with the tenant to incorporate into leases, i.e. the tenant environmental management requirements;
- c) environmental legislation – use of legislation to define responsibility; and
- d) economic factors – in order to retain tenants and attract new tenants, KPA may choose to assume additional environmental responsibilities.

To manage the potential environmental impacts associated with tenant activities, KPA has developed a series of Tenant Environmental Management Requirements (**TEMR's**) as part of the KPA EMS. New tenants are required to comply with the TEMR's, existing tenants are being transitioned towards a goal of full compliance. TEMRs have been produced to cover general environmental management as well as management of more specific environmental factors, including:

- flora;
- fauna;
- water;
- land management;
- heritage;
- chemical handling;
- emissions; and
- waste management.

KPA also conducts regular inspections of its tenants to ensure compliance with environmental requirements. All tenants are required to:

- manage their specific potential environmental impacts;
- comply with relevant environmental legislation and other operational legislation;
- meet the conditions of their lease;
- comply with conditions specified under their individual operating licences; and
- undertake relevant monitoring for example, groundwater testing and noise monitoring.

In regards to contractors, both those under KPA's responsibilities and port users, KPA has a range of controls in place for the Port of Broome to manage potential environmental impacts including:

- preferred contractor list;
- Contracts;
- Inspection and audit program;
- Permit to Work System;
- Contractors' Handbook;
- Port Standards and Conditions; and
- HSE and Security Induction.

4.5.3. Regulatory control

At Port of Broome members of the public have access to areas of port lands, for example Entrance Point Boat Ramp. KPA has regulatory control in regards to the activities undertaken by members of the public on port lands. KPA manages the risks associated with these activities primarily through the Port of Broome Standards and Conditions and inspections. In addition, members of the public are required to undertake activities in compliance with environmental legislation.

4.6. *Emergency Preparedness and Response*

KPA's *Environmental Aspects and Impacts Procedure* provides for the identification of potential environmental impacts resulting from emergency situations. These unplanned environmental aspects and their associated potential impacts have been captured in KPA's Port of Broome *Emergency Response Plan (ERP)*. The ERP defines the procedures to be followed in the case of any emergency. An incident control system is defined in the ERP, specifying particular roles and responsibilities for key personnel. Guidance in the steps to be taken in types of emergencies particular to port operations or KPA's operations is also provided. In addition to the ERP, KPA has developed a *Marine Oil Pollution Contingency Plan (MOPCP)*. The MOPCP aims to minimise the impact of oil spills from any source on the environment of the Port of Broome and adjacent areas. The environmental response priorities of the MOPCP are to habitat, cultural resources and rare or endangered flora/fauna, second only to human life and safety. However, it is noted that these objectives may require reprioritisation in order to maximise effectiveness of the response.

All emergency situations having (or with the potential to have) associated environmental impacts are treated as environmental nonconformities in accordance with the *Environmental Nonconformity Identification and Mitigation Procedure*. Adherence to this procedure will ensure that the impacts can be mitigated (or pre-empted and avoided) and the appropriate corrective actions applied.

The ERP is tested at a minimum of once per year in a scenario-type drill. A debrief is held following the test, enabling deficiencies and opportunities for improvement to be identified. The ERP and related documents are updated and revised if necessary.

Once additional ports are amalgamated with KPA, the KPA ERP will be updated to address the management structure of emergencies at these ports and refer to the relevant Port Operator response plans and procedures.

5. CHECKING

5.1. Monitoring and Measurement

The process for identifying, implementing and maintaining appropriate inspection, testing and monitoring of significant environmental aspects associated with KPA's activities, products and services is detailed in the *Environmental Monitoring and Measuring Procedure*.

KPA has the following existing and planned monitoring programs for the Port of Broome:

- Marine Baseline Monitoring – KPA completed a marine baseline monitoring program in 2016. Overall, the baseline assessment identified that the marine environments of the Port of Broome are in good condition. KPA will now be implementing an ongoing marine monitoring program;
- Invasive Marine Pest Species Program – KPA, in partnership with Department of Fisheries, runs a State Wide Array Surveillance Program (**SWASP**) to monitor for the presence of invasive marine pest species. The program includes the deployment of settlement arrays and shore line monitoring; and
- Groundwater monitoring – KPA currently undertakes six monthly monitoring of its groundwater.

5.2. Evaluation of Compliance

KPA is required to periodically evaluate its compliance with the legal and other requirements it has identified as being applicable to its activities, products and services.

KPA will annually review the *Legal and Other Requirements Register* and assess each item for compliance, recording the results of the assessment in the 'Evaluation of compliance' column in the register.

5.3. Nonconformities, Corrective Actions and Preventative Actions

The process for identifying and dealing with actual and potential nonconformities is detailed in the *Environmental Nonconformity Identification and Mitigation Procedure*.

KPA is required to identify actual and potential environmental nonconformities and take action to correct or mitigate those nonconformities. It is also required to investigate the cause of any nonconformities and take action to prevent recurrence. Nonconformities may be identified formally during audits and inspections or informally by other means (e.g. by employee observation, stakeholder feedback, etc.).

5.4. Internal Audits

KPA will conduct internal audits of the EMS and this EMP on a regular basis. Internal audits will check that:

- a) KPA's EMS meets the requirements of AS/NZS ISO 14001; and
- b) the various parts of the EMS adhere to the requirements as outlined in the EMP and other supporting documentation.

The process for scheduling, planning, conducting and reporting on internal audits is detailed in the *Environment Internal Audit Procedure*.

6. MANAGEMENT REVIEW

KPA will annually review this EMP for its continued effectiveness and suitability for KPA's operations. This review is an opportunity to consider KPA's environmental performance through consideration and assessment of the following:

- the extent to which environmental objectives and targets have been met;
- KPA's compliance with legal and other requirements;
- outcomes of any corrective and preventative actions taken;
- internal audit reports; and
- any complaints or other communication received from parties external to KPA

7. REFERENCES

AS/NZS ISO 14001:2004. *Environmental Management Systems*

AS/NZS ISO 14001: 2006 *Environmental Management Systems - Requirements with guidance for use*

AS/NZS ISO 14004:1996 *Environmental Management Systems – General guidelines on principles, systems and support techniques*

AS/NZS ISO 31000:2009 *Risk Management*

Environmental Protection Act 1986

Environmental Protection Regulations 1987

Environmental Protection (Clearing of Native Vegetation) Regulations 2004

Environmental Protection (Unauthorised Discharge) Regulations 2004

Environmental Protection and Biodiversity Conservation Act 1999

Environment Protection (Sea Dumping) Act 1981

Port Authorities Act 1999