

# Independent Environmental Audit 2017

Orica Kurri Kurri - Ammonium Nitrate Emulsion Plant  
- Response to Recommendations – 6<sup>th</sup> February 2017

**Table 9.1 – Consolidated Audit Recommendations**

Source	Reference	Commitment	Recommendation	Orica Response:
Project Approval	Schedule 3 – Hazards, condition 4.1	Within 3 months of the approval of Modification 2. or further time agreed with SafeWork NSW, the applicant shall update the current MHF Safety Case for the facility and provide the relevant information of SafeWork NSW.	To remain compliant, Orica will need to submit the updated Safety Case to SafeWork NSW on or before 27 April 2017	Action No: 2017-AP00046848  Action Description: Submit the updated Safety Case to SafeWork NSW prior to 27 April 2017.  Due Date: 27/04/2017
Project Approval	Schedule 3 – Hazards, condition 5	Twelve months after the commencement of operations of the proposed ANE Facility and every three years thereafter, or at such intervals as the Director-General may agree, the Proponent shall carryout a comprehensive Hazard Audit of the site and within one month of each audit submit a report to the Director-General. a) The audits shall be carried out at the Proponent's expense by a qualified person or team, independent of the overall site, approved by the Director-General prior to commencement of each audit. Hazard Audits shall be consistent with the Department of Planning's Hazardous Industry Planning	To meet consent time frames, the next Hazard Audit is due to be conducted by 7 February 2019, and the report due to be submitted to the Director-General by 7 March 2019.	Accepted

Source	Reference	Commitment	Recommendation	Orica Response:
		Advisory Paper No.5, 'Hazard Audit Guidelines'. b) The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented.		
Project Approval	Schedule 3 – Independent Traffic Audit, condition 11a	Independent Traffic Audits must have the verification component of the audit undertaken without prior notice to the proponent.	As requested by DPE in their letter to Orica (23.10.16) future ITAs must clearly state that the verification component of the audit was undertaken without prior notice to the Proponent	Action No: 2017-AP00046850  Action Description: Notify independent traffic auditor of requirements.  Due Date: 30/06/2017
Project Approval	Schedule 3 – Independent Traffic Audit, condition 11f	Within 1 month of commissioning the audit, or as otherwise agreed by the Director-General, the Proponent shall submit a copy of the audit report to the Director-General, with a response to any of the recommendations contained in the audit report.	In future submissions of ITAs include a response to audit recommendations.	Accepted
Emergency Plan	1.5.1 Document control and Distribution	This plan has been submitted to the Director-General NSW Department of Planning for approval and must be resubmitted for approval when there are significant changes to the plan.	Check with DPE regarding their need to review. If not required, remove the requirement to submit to Director-General from the document. The Plan is submitted to NSW Fire and	Action No: 2017-AP00046851  Action Description: Check with DPE regarding their need to review the Emergency Plan.

Source	Reference	Commitment	Recommendation	Orica Response:
			Rescue when external review is required.	Due Date: 31/10/2017
Safety Management System	14.3.1 Specialist SH&E Training	Additionally, all principal Site Managers undergo a Site Manager's Competency Assessment, and preparation of a development plan at least every four years. The Engineering Shared Services team is responsible for scheduling the competency assessment.	We suggest that the document be updated to reflect new process.	No longer applicable. Orica to review Safety Management System and external audit checklist to be updated.
Safety Management System	17.2 Letter of Assurance	The Letter of Assurance process is used to report SH&E Assurance annually to the Chief Executive Officer (CEO) of Orica Ltd. Letters of Assurance are prepared by each Site Manager, using information gained during audits conducted during the period, the results of investigations into incidents and reviews with the Site Management Team.	We suggest report is updated to reflect updated process	No longer applicable. Orica to review Safety Management System and external audit checklist to be updated.
Road Transport Protocol	1.3.2 Truck controls	Licensing of all vehicles by the relevant regulatory authority	It is recommended that the document be revised to put the responsibility back onto the contractor as Orica can't control this.	Action No: 2017-AP00046852  Action Description: Review and update Road Transport Protocol.  Due Date: 31/10/2017

Source	Reference	Commitment	Recommendation	Orica Response:
Road Transport Protocol	3.2 Compliance	Drivers found to be non-compliant may be subjected to Orica's disciplinary process or prevented from delivering to site in the case of contract or delivery drivers.	We suggest that the document is revised to put the responsibility back onto the contractor as Orica can't control this.	Action No: 2017-AP00046853  Action Description: Review and update Road Transport Protocol.  Dues Date: 31/10/2017
Soil and Water Management Plan	Table 5.1	Maintain existing upslope diversion bunds. Maintain concentrated water channels adjacent to diversion bunds to prevent erosion and down slope sedimentation.	Undertake measures to reduce erosion in clean water diversion.	Action No: 2017-AP00046854  Action Description: Engage contractors to repair erosion. Due Date: 31/12/2017
Soil and Water Management Plan	Table 6.1	Regular inspection of clean water diversions, especially following rainfall events. Carry out repairs as required to ensure they remain in good working condition.	Undertake measures to reduce erosion in clean water diversion.	Action No: 2017-AP00046854  Action Description: Carry out inspection as per SAP PM.  Due Date: 31/12/2017
Soil and Water Management Plan	4.0 Legislative Requirements	In addition to Orica's legislative requirements detailed in Section 2.0 of the EMS-O, Orica will undertake stormwater, erosion and sediment management in accordance with: <ul style="list-style-type: none"> <li>• Project Approval (09_0090);</li> <li>• Environmental Protection Licence (number 4121);</li> <li>• Protection of the Environment Operations Act</li> </ul>	Undertake measures to reduce erosion in clean water diversion.	Action No: 2017-AP00046854  Action Description: Engage contractor to ensure legislative requirements are met.  Due Date: 31/12/2017

Source	Reference	Commitment	Recommendation	Orica Response:
		1997 (POEO Act), administered by the NSW Department of Environmental and Heritage (OEH); <ul style="list-style-type: none"> <li>• Environmental Planning and Assessment Act 1979 (EP&amp;A Act), administered by the NSW Department of Planning (DoP);</li> <li>• Water Management Act 2000, administered by the NSW Office of Water (NOW);</li> <li>• Operation phase commitments of the CSWMP;</li> <li>• Managing Urban Stormwater: Soils and Construction (the Blue Book) Volume 1 (Landcom, 2004); and</li> <li>• Managing Urban Stormwater: Harvesting and Reuse (DEC, 2006).</li> </ul>		
Environmental Management Strategy	2.1 Environmental Aspects	The Register [of Environmental Aspects] will be reviewed every two years, and changes to the identification of aspects, the assessment of risk, and the identification of control measures to reduce the risk will be implemented as required.	Schedule a biennial review the register of environmental aspects.	Action No: 2017-AP00046855  Action Description: Schedule a biennial review of the register of environmental aspects.  Due Date: 30/04/2017
Environmental Management Strategy	2.2 Legal and Other Requirements	Should the scope of current operations change, or if a development application is to be lodged for alterations or	Include review of the legal register in the biennial review of the EMS.	Accepted

Source	Reference	Commitment	Recommendation	Orica Response:
		extensions to the ANE Facility or its associated lands, applicable legislation and environmental planning instruments should be investigated, and this section should be updated, to ensure currency.		
Environmental Management Strategy	2.3 Objectives and Targets	It is expected that these objectives and targets will be reviewed at least every two years to ensure they are actively achieving best practice in environmental management, and are still relevant to local conditions and the legislative framework. New objectives may be determined and new targets set over time.	Review the EMS objectives and targets during the biennial review.	Accepted
Environmental Management Strategy	3.3.2.1 General enquiries, information and visitors	The contact numbers for the site are as listed below: - Orica Technology Centre enquiry line - (02) 4939 5200; and - ERS - 1800 033 111. These phone numbers will be listed in the White Pages, advertised via signage at the Orica Richmond Vale site entrance on George Booth Drive, and noted on relevant vehicles in the case of the ERS number in accordance with the Road Transport Protocol.	Suggestion for improvement to the document. Remove the ERS number. Add the complaints number. Remove requirement to list these in the white pages. Change to webpage. Advertised number on the signage at front of Orica should be the 1300 number advertised on the website.	The enquiry lines 4939 5200 and 1300 are linked to the same telephone reception.

Source	Reference	Commitment	Recommendation	Orica Response:
Environmental Management Strategy	3.3.2.6 Community Consultation and Support	The Technical Centre site will implement a community consultative group which will include representatives from local government, emergency services and local residents. This group will provide a communication conduit between the site and the local community and provide feedback on business performance and discuss community concerns.	Establish a consultative group in line with DPE guidelines.	Action No: 2017-AP00046857  Action Description: The Technical Centre to establish a consultative group in line with DPE guidelines.  Due Date: 30/09/2017
Environmental Management Strategy	4.1 Monitoring and Evaluation	the EMPs will be formally audited on an annual basis by the Technology Centre site Manager with the SH&E team representative.	Implement annual audit process for EMPs.	Action No. 2017-AP00046883  Action Description: Implement a six monthly PM audit process for EMPs. Due Date: 31/03/2017
Environmental Management Strategy	4.4.1 Internal Audits	The EMS shall be audited on two-yearly (biennial) basis. Biennial audits will also be conducted of the site-specific Management Plans referred to in this EMS.	Schedule a biennial internal audit of the EMS.	Action No. 2017-AP00046884  Action Description: Schedule a biennial internal audit of the EMS in the Orica DMS system.  Due Date: 30/04/2017



Environmental Management Strategy	4.4.1 Internal Audits	All auditing records will be maintained by the SH&E team. A formal audit report must be prepared for each audit undertaken.	Establish and maintain a system to record audit records.	<p>Action No. 2017-AP00046884</p> <p>Action Description: All auditing records from the audit to be recorded in the Orica DMS system.</p> <p>Due Date: 30/04/2017</p>
Environmental Management Strategy	6.2 Reuse and recycling	<p>Recycling provisions in accordance with council requirements and the Waste Avoidance and Resource Recovery (WARR) Act.</p> <p>Check that any waste produced on site is taken to the appropriately labelled storage bin and taken to the appropriate licensed facility. Monthly via receipt of report from waste contractor.</p>	We suggest a periodic audit of waste vehicles is undertaken to check compliance with weight records.	Accept