



Australia Business Unit East
Standard Operating Procedure
Environmental Protection Code of Conduct
Implementation

ABUE-450-EN-N05-C-00002

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ABUE Environmental Protection Code of Conduct Implementation SOP

Revision History

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000	05-Jan-2016	Use	Jamie Reilly Environmental Monitoring & Compliance Specialist	Alan Hayter Environmental Lead	Jack Taylor General Manager HSE

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1. Purpose

This document provides the framework of how Conditions 4 to 12 of EPBC Approval 2009/4977 will be addressed during operation of the Australia Pacific LNG (APLNG) Facility.

2. Scope

This document applies to all personnel who conduct work at, or visit, the APLNG Facility.

3. Responsibilities

3.1. Operations Manager

- To ensure that all parties undertake their responsibilities as documented.

3.2. Supply Chain Manager

- For those contracts where work is undertaken on Curtis Island, to incorporate Environmental Protection Code of Conduct (EPCoC) requirements in contract or related documentation.

3.3. General Manager HSE

- To develop this document and EPCoC related documents.

3.4. APLNG Operations Team Leader

- To permit access to Curtis Island to those personnel undertaking work who have completed the necessary Environmental Protection Code of Conduct training;
- To ensure visitor hosts are aware of the need for visitors to complete the Visitor Induction prior to leaving the Main Control and Administration Building (MCAB).

3.5. Contract Owner

- For those contracts where work is undertaken on Curtis Island, to inform Contractors of the relevant requirements of this Standard Operating procedure (SOP).

3.6. Visitor Hosts

- To ensure their visitors complete the Visitor Induction prior to leaving MCAB.

3.7. Employees and Contractors

- To be familiar with their obligations under the EPCoC.
- To complete the required EPCoC training.
- To ask questions if clarity regarding EPCoC requirements is needed.

3.8. Training and Competency Lead

- To ensure the EPCoC is available to all personnel performing work on Curtis Island.
- To ensure all personnel training is recorded and maintain personnel records in the Competency Management System.
- To audit Contractor personnel records held elsewhere as per audit schedule.

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4. References

- ABUE Environmental Protection Code of Conduct Training Module
- ABUE Visitor Induction Training Module
- Australia Pacific LNG Project Code of Conduct Framework (APLN-000-EN-V01-D-14867)

5. Terms and Definitions

Table 5.1 below lists the abbreviations used throughout this document and their meanings.

Table 5.1. List of Abbreviations

Term	Definition
ABUE	Australia Business Unit East
COP	ConocoPhillips
DotE	Department of the Environment
EPCoC	Environmental Protection Code of Conduct
LNG	Liquefied Natural Gas
May	Indicates a permitted course of action
MCAB	Main Control and Administration Building
Must	Indicates a mandatory course of action
Should	Indicates a preferred course of action
SOP	Standard Operating procedure

6. Overview

This document provides guidance and references to supporting documentation which has been, or is currently being developed to set out the requirements to be met and standards to be achieved by those working at and visiting the APLNG Facility on Curtis Island.

6.1. Transition Arrangements

Prior to the commencement of Train 2 normal operations all operations personnel are required to complete the Environmental Protection Code of Conduct training (refer Table 6.1). The relevant EPCoC requirements for APLNG Downstream Project personnel are outlined in the Australia Pacific LNG Project Code of Conduct Framework (APLN-000-EN-V01-D-14867). The Australia Pacific LNG Project Code of Conduct Framework was previously approved by Department of the Environment (DotE) on 15 April 2013.

All new personnel undertaking activities in project controlled (i.e. construction or commissioning) areas must complete the Project Induction. In addition, COP operations personnel must also complete the ABUE Environmental Protection Code of Conduct Training Module.

6.2. ABUE EPCoC Implementation

The Implementation Framework sets out where ABUE EPCoC requirements have been incorporated into ABUE HSE documents (refer Table 6.2).

Contract documentation must include the requirement that all personnel who conduct work on the Curtis Island facility must complete the ABUE EPCoC Training Module.

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All existing COP employees and contractors undertaking work on site are required to complete the ABUE EPCoC Training Module prior to the commencement of normal operations for Train 2, even if they have previously completed the Bechtel Induction.

New ABUE employees and contractors employed after the commencement of Train 2 normal operations are required to complete the ABUE EPCoC Training Module prior to accessing site.

Visitors to site are required to complete the visitor induction (refer Table 6.1).

Table 6.1: ABUE EPCoC Training Requirements

	ABUE EPCoC Training Module	ABUE Visitor Induction	Notes
Project Employee or Contractor¹			
Existing and New	No	No	
Operations Employee or Contractor³			
Existing	Yes ²	No	Must complete both Project and ABUE EPCoC Training Module Versions
New	Yes ²		
Visitor	No	Yes ³	

Notes:

¹ - Includes all project personnel undertaking activities in construction and commissioning areas on-site. Project Code of Conduct Training previously completed

² - Must complete prior to commencement of Train 2 normal operations.

³ - Prior to accessing site from MCAB.

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Table 6.2: Implementation Framework

EPBC Approval 2009/4977 Condition	Minimum standard	Method	Responsibility
4. <i>The proponent must not bring private motor vehicles onto the LNG site, or private watercraft into waters within 100 metres of the LNG site boundary, except for activities directly relating to pre-clearance surveys, site clearance, and the construction and operation of the LNG plant and ancillary onshore and marine facilities.</i>	All employees, contractors and visitors will be made aware of the restrictions with regard to private motor vehicles and watercraft through the supporting documentation identified.	Included in: - Environmental Protection Code of Conduct Training Module - Contract Specifications for those contractors working on Curtis Island	Supply Chain Manager
5. <i>The proponent must not bring animals and plants (including domestic cats and dogs and other potential pests and weeds), other than for landscaping and rehabilitation purposes onto the LNG plant and ancillary onshore and marine facilities site, or onto Curtis Island.</i>	All employees, contractors and visitors will be made aware of the restrictions with regard to animals and plants through the supporting documentation identified. Monitoring of the implementation of this condition will be as specified in the supporting documentation.	Included in: - Environmental Protection Code of Conduct Training Module - Contract Specifications for those contractors working on Curtis Island	Supply Chain Manager
6. <i>Entry into the Curtis Island Environmental Management Precinct, as identified in Figure 2, must be prohibited for all the proponent's construction workers, construction contractors, and its employees, whilst they are rostered on shifts or accommodated by the proponent on Curtis Island, except with the prior consent in writing of the authority responsible for the management of this Precinct.</i>	All employees, contractors and visitors will be made aware through an appropriate site induction process of the location and restricted entry requirements to the Curtis Island Environmental Management Precinct. Monitoring of the implementation of this condition will be as specified in the supporting documentation.	Included in: - Environmental Protection Code of Conduct Training Module - Contract Specifications for those contractors working on Curtis Island	APLNG Operations Team Leader
7. <i>An induction program must be implemented for all the proponent's employees and subcontractors at the time or before they commence work on Curtis Island. The induction program must include:</i> <i>(a) an overview that clearly explains to all the proponent's employees and sub-contractors</i>	Each person undertaking work on Curtis Island (employees of Australia Pacific LNG, contractors and sub-contractors) must undertake an induction program at the commencement of work activities in accordance with the requirements of Conditions 7 to 11 of EPBC Approval 2009/4977. A visitor induction must be completed for each visitor to the	Included in: - Environmental Protection Code of Conduct Training Module - Visitor Induction Training Module	Downstream Operations Manager

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EPBC Approval 2009/4977 Condition	Minimum standard	Method	Responsibility
<i>engaged on the construction and operation of the LNG Facility that they are working in a World Heritage Area and an explanation of the environmental values of the World Heritage Area;</i> <i>(b) information on listed species and ecological communities and other native species that are found in the area, and the related responsibilities of the proponent, its employees and subcontractors;</i> <i>(c) an explanation of the Rodds Bay Dugong Protection Area, and Great Barrier Reef Marine Park zoning on the eastern side of Curtis Island, Rodds Peninsula and the Capricorn Bunker group, and the responsibilities of the proponent, its employees and subcontractors within and in relation to these areas. This explanation must include the provision of maps depicting the zones, an explanation as to what can and cannot be done in the various zones, and information about how important the terrestrial and marine environments of the Capricorn Bunker group are to conserving biodiversity within the Great Barrier Reef Marine Park; and</i> <i>(d) information that has the objective of fostering a culture of environmental awareness of the values of the area and also raises awareness among all employees and subcontractors of the compliance and enforcement programs of the Great Barrier Reef Marine Park Authority and penalties that apply for offences.</i>	Curtis Island LNG Facility, given that they are under the direction or control of Australia Pacific LNG. Environmental protection Code of Conduct Training Module and Visitor Induction Training Module will include: • An overview that clearly explains to all inductees the environmental values of Curtis Island and surrounds, with particular reference to the island's status as a World Heritage Area. • Information on listed species and ecological communities and other native species that are found in the area along with information regarding the responsibilities of workers and visitors with respect those species and communities. • Information regarding the Rodds Bay Dugong Protection Area, and the Great Barrier Reef Marine Park zoning on the eastern side of Curtis Island, Rodds Peninsula and the Capricorn Bunker Group along with information regarding the responsibilities of workers and visitors with respect those areas. • Information regarding the importance of the terrestrial and marine environments of these areas with respect to the conservation of biodiversity within the Great Barrier Reef Marine Park. • The requirements of the Curtis Island Environmental Protection Code of Conduct Training Module. • Access restrictions for entry into the Curtis		

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EPBC Approval 2009/4977 Condition	Minimum standard	Method	Responsibility
	Island Environmental Management Precinct. - Mapping depicting each of the relevant zones, along with an explanation of what can and cannot be done in each area. - Restrictions on bringing private motor vehicles onto the LNG Facility or private watercraft into waters within 100 metres of the LNG site boundary. - Restrictions on bringing animals and plants (including domestic cats and dogs and other potential pests and weeds), other than for landscaping and rehabilitation purposes onto the LNG plant and ancillary onshore and marine facilities site, or onto Curtis Island. - The information will be targeted towards fostering a culture of environmental awareness with respect to the values of the area. It will also assist in raising the awareness of all workers and visitors regarding the compliance and enforcement programs of the Great Barrier Reef Marine Park Authority.		
8. The obligations under conditions 4, 5, 6 and 7 must also apply to any visitors to the LNG site, or to Curtis Island, who are under the direction or control of the proponent.	All visitors will be informed of the environmental sensitivities, protection requirements and code of conduct when attending the LNG Facility at Curtis Island.	Included in: - Environmental Protection Code of Conduct Training Module - Visitor Induction Training Module	APLNG Operations Team Leader
9. Within 20 business days of the final investment decision to proceed with the proposed action, the proponent must submit to the Minister for approval: (a) a Curtis Island Environment Protection Code	This Code of Conduct Framework will be supplied to the Minister for DotE for approval as required.	Completed by: Australia Pacific LNG Project Code of Conduct Framework (APLN-000-EN-V01-D-14867) – previously approved by DotE on 15 April 2013)	APLNG DS Project HSE Manager

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EPBC Approval 2009/4977 Condition	Minimum standard	Method	Responsibility
<i>of Conduct for the construction workforce while on site and while travelling to and from the mainland and the construction site; and (b) a code of conduct implementation strategy for enforcing compliance with the Curtis Island Environment Protection Code of Conduct</i>			
<i>10. The code of conduct shall include, but not necessarily be limited to, the requirements set out in conditions 4, 5, 6 and 7.</i>	This Environmental Protection Code of Conduct Implementation SOP documents the minimum requirements to be addressed for Conditions 4, 5, 6 and 7. The supporting documentation will outline the roles and responsibilities of operational personnel accessing the LNG Facility, restrictions on permitted activities and accessible areas and training requirements.	Included in: Environmental Protection Code of Conduct Training Module	Environmental Lead
<i>11. The approved Curtis Island Environment Protection Code of Conduct must be implemented.</i>	Monitoring of the implementation of the Environmental Code of Conduct Framework and the supporting documentation will be carried out during construction and operation of the LNG Facility. The supporting documentation will outline the types and frequency of compliance monitoring.	Included in: Environmental Protection Code of Conduct Training Module	APLNG Operations Team Leader
<i>12. At least 60 business days before the commissioning of the first LNG train, the proponent must review, and if necessary revise, the Curtis Island Environment Protection Code of Conduct and implementation strategy and provide the Minister with evidence that this review has been carried out. If the Curtis Island Environment Protection Code of Conduct and/or implementation strategy are revised, the revised document or documents must be submitted to the Minister for approval within</i>	The document (APLN-000-EN-V01-D-14867) was reviewed prior to commissioning of Train 1 for commissioning and operation phases of the project. No revision was required. However as the site a transition to Operations a new Training Module was developed for personnel undertaking Operations-related activities.	Included in: - Environmental Protection Code of Conduct Training Module - Standard Operating Procedure - Environmental Protection Code of Conduct Implementation (ABUE-450-EN-N05-C-00002) – this document	General Manager HSE

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EPBC Approval 2009/4977 Condition	Minimum standard	Method	Responsibility
<i>20 business days of the review being finalised. Once the Minister has approved in writing the revised code of conduct and/or implementation strategy, the approved code of conduct and/or implementation strategy must be implemented.</i>			

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7. Audit Requirements

The implementation of this procedure will be verified at periodical intervals, in accordance with ConocoPhillips' auditing requirements such intervals not to exceed 3 years.