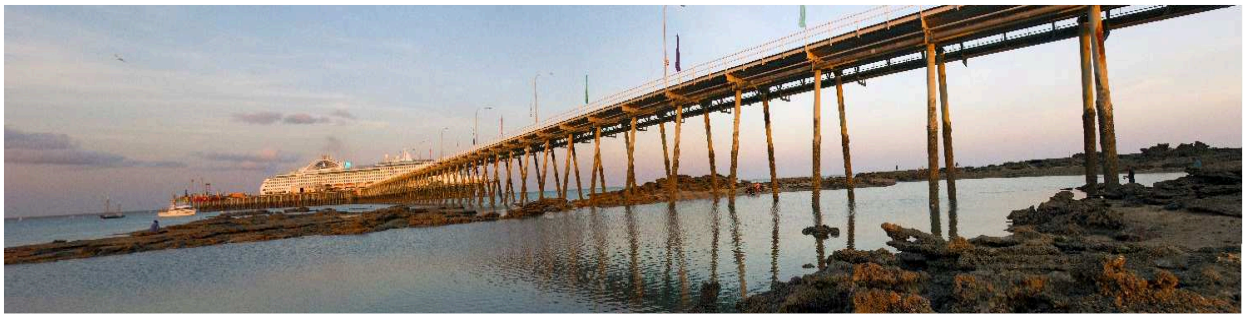
KIMBERLEY PORTS AUTHORITY

ENVIRONMENTAL MANAGEMENT PLAN 2023



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LIST OF ABBREVIATIONS

CGL: Cambridge Gulf Limited

DBCA: Department of Biodiversity Conservation and Attraction

DOT: Department of Transport

EMP: Environmental Management Plan

EMS: Environmental Management System

ERP: Emergency Response Plan

HSER: Health Safety Environment & Risk

KPA: Kimberley Ports Authority

MOPCP: Marine Oil Pollution Contingency Plan

MOU: Memorandum of understanding

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

Kimberley Ports Authority (**KPA**) is a Government Trading Enterprise under the *Port Authorities Act 1999* (the **Act**), which defines a clear role for all port authorities and establishes lines of accountability and reporting requirements to the State Government. KPA directly manages the Port of Broome and has regulatory responsibility for the Ports of Derby, Wyndham and Yampi Sound.

Under the Act, KPA has a duty to act on commercial principles and perform defined functions, including to:

- facilitate trade within and through the port and plan for future growth and development of the port
- undertake or arrange for activities that will encourage and facilitate the development of trade and commerce generally for the economic benefit of the State through the use of the port and related facilities
- control business and other activities in the port or in connection with the operation of the port
- be responsible for the safe and efficient operation of the port
- be responsible for maintaining port property
- be responsible for port security and
- protect the environment of the port and minimise the impact of port operations on that environment.

KPA's Environmental Management Plan (this document) (**EMP**) outlines how environmental management is undertaken under the various management frameworks at each of the ports. The EMP is required by KPA under the Act and is a "live" document. The EMP will address new activities that may arise and incorporate any legislative changes or best practice conditions which may evolve from time to time.

This EMP follows the structure of AS/NZS ISO 14001: 2015 to demonstrate how KPA manages its operations to minimise risk to the environment. 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 key environmental risks and 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
- highlight reference documents, systems, and processes central to environmental management at KPA.

1.1. KPA Ports

KPA directly manages the Port of Broome and in July 2021 the Ports of Derby, Wyndham and Yampi Sound were amalgamated into the KPA. For these ports KPA operates under the auspices of the *Port Authorities Act 1999* which covers vestment of the port land and waters and a range of obligations including trade development, infrastructure planning and maintenance, caring for the environment and ensuring safe port operations. KPA has a regional Harbourmaster who is responsible for marine safety and security.

1.1.1.Port of Broome

The Port of Broome is a deep water port that is located at the southern tip of the Dampier Peninsula. A steel pile jetty extends from the peninsula in an easterly direction, reaching the deeper waters of the Inner Anchorage within Roebuck Bay. The Yawara Nagulagun / Roebuck Bay Marine Park is adjacent to port waters. Roebuck Bay is also a Ramsar 'Wetland of International Importance'.

The port has serviced the Kimberley region since 1889 and supports Broome's pearling fleet, offshore oil and gas exploration supply vessels, oil tankers, livestock carriers, breakbulk and general cargo vessels, fishing vessels, charter boats, cruise liners, private vessels and Navy and Customs patrol vessels. The port is the main fuel and cargo hub port for the Kimberley region, and in recent years its principal exports have been livestock and offshore drilling rig equipment and materials.

Port of Broome

KPA has strategically located land holdings that are used for port related activities and developments. A portion of land is used by KPA and a portion is leased to tenants for a variety of purposes including hydrocarbon tank farms, offshore supply bases, oil and gas drilling fluid storage, road transport providers, fishing club, hovercraft base and limited residential use.

KPA is charged with the role of overall management of the Port of Broome. This involves financial aspects, strategic planning, forecasting and development. In addition, 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.

1.1.2. Port of Derby

The original Derby jetty was built in 1885 and replaced in 1964 by the current steel and concrete structure. Historically the Port of Derby has exported a range of products including wool, pearl shell, high-grade zine and lead ore, live cattle and fuel.

The Shire of Derby West Kimberley has held the lease and management agreements for the Port of Derby area since 1997, inclusive of the wharf and boat ramp and marine surrounds. The current lease and management agreements expire in 2040.

Port of Derby

The main activities at Derby Port include:

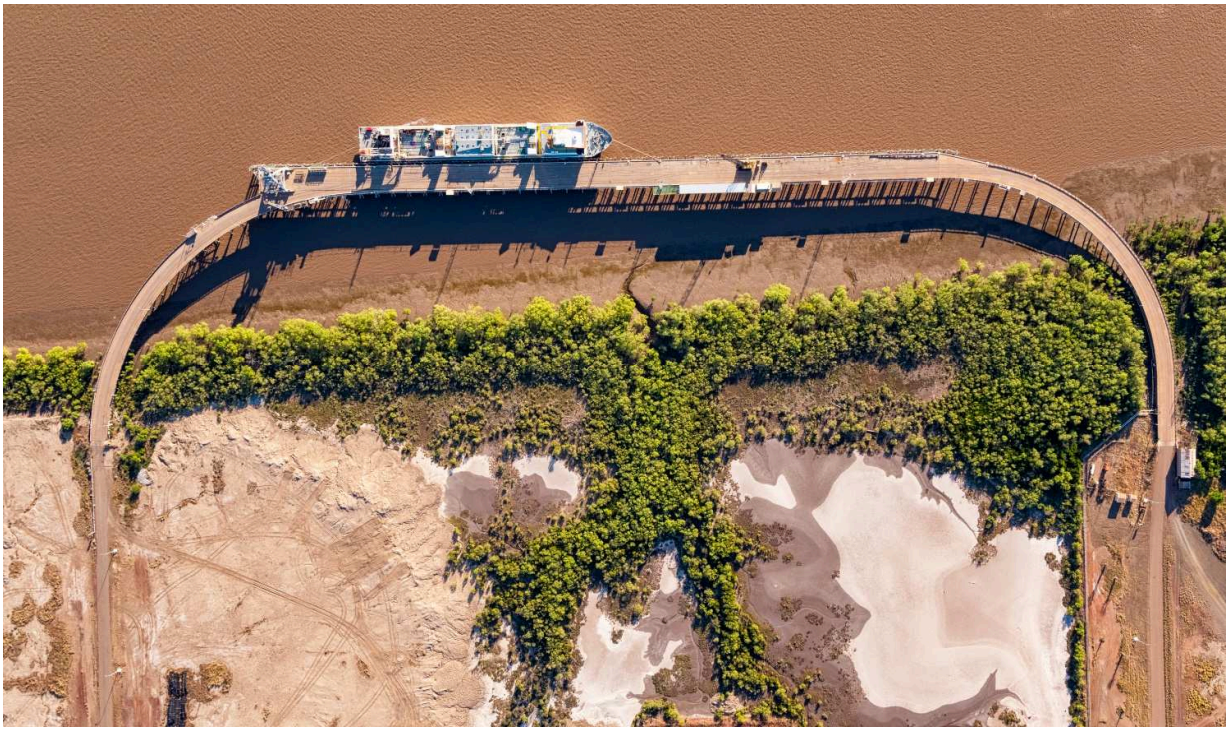
- provision of barging facilities associated with offshore mining ventures at Cockatoo and Koolan Islands;
- servicing shipping activity in relation to the movement of farmed Barramundi;
- vessel fuelling and
- use as a recreational facility by the local community.

The port area also provides recreational boat launching facilities (two ramps, one adjacent to the barge ramp/wharf, and another into a creek to the south of the port area) and a barge loading ramp.

The wharf infrastructure is on tidal mudflats and mangroves are established in the intertidal zone along the shore surrounding the wharf and barge loading facilities.

1.1.3.Port of Wyndham

Wyndham Port is located on the Cambridge Gulf, approximately 4km northwest of Wyndham township and immediately north of the Wyndham Port township. Wyndham is about 100km northwest of Kununurra and is situated at the confluence of the Durack, Kink, Pentecost, Forrest and Ord Rivers. Bastion Range is immediately to the east of the port.



Port of Wyndham

Gazetted in 1886, Wyndham Port services the East Kimberley region and is the nearest port to Kununurra. The next nearest ports are to the east (Darwin) and west (Derby and Broome). Recent exports through the port include nickel-copper-cobalt concentrates, crude oil, iron ore, containerised freight, livestock and mahogany. The port has historically handled other cargoes including frozen meat from the former meatworks, sugar cane, cotton, grain, lead concentrate, zinc concentrate, general cargo and other bulk commodities. The current concrete and steel wharf was built in the 1970s, replacing an earlier timber structure.

The port's landholdings are situated on tidal mudflats that have been partially reclaimed using fill to establish a ground level above the high tide mark. Mangroves are established in the intertidal zone along the shore of the western mudflats and in associated runnels.

Cambridge Gulf Ltd (**CGL**) currently lease and manage the port.

1.1.4. Port of Yampi Sound

The Port of Yampi Sound includes Cockatoo, Koolan and Irvine Islands.

Kimberley Ports Authority (KPA) is responsible for the jetty licenses on Koolan and Cockatoo Islands, as well as the maritime security and shipping safety in port waters surrounding the islands within the Buccaneer Archipelago.

The Mayala and Maiyalam marine parks surround the Yampi Sound port waters.

Cockatoo Island

Koolan Island

2. CONTEXT OF THE ORGANISATION

2.1. Understanding the organisation and its context – Strategic Planning

KPA conducts annual strategic planning workshops to set strategic business direction in the short, medium and long-term context. As part of KPA's annual strategic planning process, KPA assesses the internal and external environmental issues that may have a direct influence on the effectiveness of KPA's strategic goals and the potential for KPA to impact on local, regional and national environmental and sustainability issues. For example:

- Internal issues, which may include organisation culture, services, resourcing, activities and processes and
- External issues, which may include commodity market and economic conditions, meeting government objectives and new legislative obligations, maintaining cost competitive operations, stakeholder expectations and environmental conditions.

2.2. Understanding the needs and expectation of stakeholders

KPA interacts with a range of stakeholders including government agencies, customers, port users, community, business / industrial, media and KPA employees. KPA's Communication plan identifies KPA's stakeholders and outlines an engagement approach. Outcomes from the implementation of this plan are considered in the development of KPA's strategic objectives.

2.3. KPA's role in environmental management

In delivering this EMP, KPA aims to achieve best practice standards in environmental management across all its port services and activities. It provides a framework that effectively manages risks to minimise impacts to the environment of KPA's ports.

Overarching environmental management of KPA's ports is determined by a range of State and Commonwealth legislation, including the *Environmental Protection Act 1986*, which is administered by the Western Australian Environmental Protection Authority (EPA). KPA and its lessees, licensees, service providers, contractors and other port users are all required to comply with the *Environmental Protection Act 1986* (WA).

This is recognised within the *Port Authorities Act 1999*, which states: "Nothing in this Act limits or otherwise affects the operation of the *Environmental Protection Act 1986* in relation to a port, a port authority or port operations."

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 generally one of three types:

- **Direct 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. KPA maintains a regulatory role to fulfil its obligations under the *Port Authorities Act*, however, as separate business entities these third parties have the primary individual responsibility to ensure that their activities meet KPA's and environmental regulatory requirements 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*. Members of the public have access to port waters and portions of port lands, for example where there are boat ramps. KPA has regulatory control in regards to the activities undertaken by members of the public on port lands. In addition, members of the public are required to undertake activities in compliance with environmental legislation.

In general, KPA's control at the various ports can be categorised as follows:

- Port of Broome: direct operational control, commercial control and regulatory control
- Port of Wyndham: commercial control and regulatory control
- Port of Derby: commercial control and regulatory control
- Port of Yampi Sound: commercial control and regulatory control

2.4. KPA Environmental Management Framework

KPA has a range of systems and processes in place to ensure environmental management is undertaken effectively at each of the ports.

2.4.1.Port of Broome

KPA has an Environmental Management System (EMS) which provides the framework for managing the impact of KPA's activities, products and services on the environment. In addition there are a range off supporting systems and plans as outlined below:

- 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**).

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.

2.4.2.Ports of Wyndham & Derby

- Lease and management agreements which include responsibilities for environmental management

- Environmental audit and inspection program
- Certification to ISO 14001:2015 at Port of Wyndham by CGL

2.4.3.Ports of Yampi Sound

- Jetty and seabed licences for Koolan and Cockatoo Islands

3. LEADERSHIP AND COMMITMENT

KPA is committed to deliver its services and activities in an environmentally sustainable and responsible manner. All KPA employees, contractors and other positions under the direct control of KPA have a general duty under the *Environmental Protection Act 1986 (WA)* to:

- Not cause or allow serious environmental harm or material environmental harm; or
- Intentionally or otherwise, cause pollution or an unreasonable emission from any premises.

The minimum responsibilities and accountabilities for KPA employees are documented in position descriptions, each of which will have some level of role, responsibility and authority for managing environmental aspects. This may include implementing operational controls, risk treatment plans, programs or other administrative controls. An outline of the roles, responsibilities and authorities at key levels within KPA are displayed in Table 1.

Table 1: Environmental Roles and Responsibilities

Role	Responsibility
KPA Board of Directors	Under Section 8(2) of the Act, the Board is to "perform the functions, determine the policies and control the affairs of the Port Authority". As such, the Board is responsible for determining and endorsing KPA's Environment Policy.
KPA Managers	Members of the Management Team are responsible for ensuring environmental stewardship and accountability within their specific function. Specific responsibilities include: • CEO - is responsible for leading the culture of the organisation regarding environmental management. The CEO delegates responsibility for various risk mitigation initiatives and approves resources in consultation with the Managers. • Managers - are responsible for annual workforce planning to ensure adequate resources and budget is available for the implementation of KPA's environmental plans and programs. • Regional Harbour Master - is responsible for ensuring the safe and efficient movement of vessels through KPA's ports and ensuring those vessels and their associated activities are undertaken with minimal impact to the ports. The Regional Harbour Master also undertakes a key role as Incident Controller in the event of a port marine oil pollution emergency. • HSER Manager - has overall responsibility for the coordination of environmental management, including: -the development of the EMP -reporting on environmental management system performance and -providing recommendations for continual improvement to the Management Team for review.
KPA Employees	KPA employees are required to: • report environment risks or incidents • consider environmental risks and opportunities during their tasks and • adhere to this EMP.

Contractors	Contractors and service providers are expected to adhere to their legislative obligations and this EMP when operating on behalf of or directly for KPA
Lessees / licensees	Lessees and licensees must adhere to the conditions in their commercial agreements with KPA to ensure the environmental impacts from their activities are managed. They must also abide by environment and heritage legislation.

4. PLANNING

The EMP considers:

- KPA's Vision and Mission statement
- KPA's Strategic Development Plan 2022/27
- Port of Broome Master plan
- internal and external environmental issues
- environmental themes and objectives
- the needs and expectations of internal and external stakeholders and
- the current scope of KPA's services and activities.

During the planning process, KPA also determines the risks and opportunities related to its compliance obligations, environmental aspects and other issues and requirements that need to be addressed in order to:

- give assurance the EMP will achieve its intended outcomes
- prevent or reduce undesired effects / environmental harm and
- achieve continual improvement.

4.1. Legal Requirements

There are a range of State and Federal environmental laws, regulations and standards that are relevant to KPA's operations. KPA has processes in place to ensure any legislative changes and amendments are taken into account. Some of the key legislation relating to KPA's operations include, but are not limited to:

4.1.1.State

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

4.1.2.Commonwealth

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

4.2. 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.

From a strategic risk perspective, KPA has identified climate change impacts and environmental sustainability as strategic risks across its ports.

Table 2 provides a summary of the key operational environmental risks that KPA has identified across its ports.

As part of KPA's risk management process, opportunities are also identified during the risk assessment process. The following are examples of environmental initiatives KPA undertakes that were identified during the risk and opportunity process:

- Broome Community Seagrass monitoring project: KPA provides financial support for the Broome Community Seagrass monitoring project. The project includes sites in port waters and has been running for over 11 years. The regular monitoring events involve community volunteers and Indigenous rangers and provide an early warning of change in the marine ecosystem of Roebuck Bay.
- Osprey Nesting Platforms: KPA maintains 4 Osprey nesting platforms within the Port of Broome. These nesting platforms are designed to allow Ospreys to build their nest above the ports working zones and operations, away from human interactions and disturbance. KPA consults with DBCA wildlife experts on osprey matters.
- Marine Park Consultation groups: KPA has a memorandum of understanding (**MOU**) with Nyamba Buru Yawuru and Department of Biodiversity Conservation and Attraction (**DBCA**) for the Yawuru Nagulagun / Roebuck Bay Marine Park. This forum provides an opportunity for information sharing and to raise any trans-boundary issues between the marine park and port waters boundary. KPA also has an MOU with DBCA and Dambeemangardee Aboriginal Corporation for the Maiyalam Marine Park and an MOU between Mayala Inninalang Aboriginal Corporation, DBCA and KPA for the Mayala Marine Park. These marine parks have boundaries with the Yampi Sound ports.
- State Wide Array Surveillance Program: KPA is liaising with Department of Fisheries to extend the SWASP that is currently undertaken at the Port of Broome to include similar programs at the Ports of Derby, Wyndham and Yampi Sound.

Table 2: Overview of KPA's Key Environmental Risks

Risk Description	Cause	Resulting In	Consequence Category	Inherent Risk			Controls (already in place)	TAPS (to be implemented)	Post Tap 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.	• Toxicity and smothering of marine biota from spilled product • Damage or destruction of marine habitat • Reduction in water quality from nutrients and suspended solids • Contamination of soil and potentially groundwater	Environment	5	3	15	• Port of Broome HSE and Security Induction, EMS, Permit to Work System and CCTV • Emergency response plans • Audit and inspection program • Maintenance program • Commercial leases and contracts	• Ongoing audit and inspection program • Ongoing review of emergency response plans against best practice guidelines	4	2	8
Cumulative loss of environmental values	Failure to adequately manage environmental impacts.	Degradation of environmental values including (but not limited to): • water quality • sediment quality • seagrass health • mangroves	Environment	4	3	12	Environmental monitoring programs at Port of Broome including: • Groundwater monitoring • Marine monitoring • SWASP to monitor for invasive marine pest species Other controls, including ats other ports include: • Development Application process • Audit and inspection program	• Investigate options to implement SWASP at other ports	3	2	6

Risk Description	Cause	Resulting In	Consequence Category	Inherent Risk			Controls (already in place)	TAPS (to be implemented)	Post Tap Risk		
				C	L	R			C	L	R
							• Native vegetation clearing application process • Hazardous chemical management processes • Biosecurity Response Procedure (Port of Broome)				
Failure to manage existing contaminated sites	Unknown extent of contamination or ongoing contamination of a site.	Adverse impact on land or marine environments.	Environment	4	3	12	• Port of Broome Tenant Environmental Management Requirements (TEMRs) • Port of Broome Slipway HSE management systems and plans • Commercial Leases and contracts • Dept of Environment monitoring requirements at Port of Wyndham • Contaminated sites registers • Groundwater monitoring • Asbestos registers	• Ongoing audit and inspection program	4	2	8

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

4.3. Environmental Objectives

KPA's strategic environmental objective as set out in the KPA Strategic Development Plan 2022/23 – 2026/27 is to seek the balance between sustainability and economic growth.

This strategy encompasses all facets of the organisation and the environment in which it operates, including the port operations, stakeholder 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 across all the ports. This will be achieved through:

- developing a master plan for all Kimberley Ports
- maintaining the Port of Broome EMS in line with AS/NZS ISO 14001
- auditing the amalgamated ports to ensure their EMS's align with KPA's requirements
- aligning environmental monitoring programs to support commercial and operational future developments
- environmental sustainability and net zero emissions planning
- developing a climate change adaptation strategy and
- incorporating coastal vulnerability and climate change considerations into KPA development strategies.

KPA has identified environmental themes and objectives to assist as part of the risk management process. The table below outlines the environmental themes, objectives and associated programs or plans.

Table 3: Overview of KPA's key environmental themes, objectives and programs

Theme	Description	Objective	Program / Plan
Ambient Air Quality	Air quality in and around the Port	Minimise impacts on the community and surrounding environment from site sourced air emissions.	• Workplace & tenant inspections • Development application process • Risk assess new processes and tenant applications

Theme	Description	Objective	Program / Plan
			• Monitor current processes • Ambient air quality currently to be managed with administrative controls, principally change management i.e. bulk loading of product considered for KPA in the future.
Biodiversity and Habitats	Marine and terrestrial fauna within the port precinct	Minimise impacts to flora and fauna and seek opportunities to enhance native species.	• Biosecurity Management Program (First Point of Entry) • SWASP • Marine monitoring (Port of Broome) • Development application process • Emergency response drills and preparedness • Marine Park MOU consultation with DBCA, Yawuru, Dambeemangardee and Mayala
Climate Change and Environmental sustainability	Design of port infrastructure to be able to withstand the impacts associated with climate change, including rising sea levels Energy consumption and greenhouse gas emissions, carbon management and offsets.	Developing resilience against the physical and social impacts of climate change at our operations Comply with government requirements in regards to emission reduction and environmental sustainability planning	• Climate Change Adaptation Workshop completed for Port of Broome, workshops for other ports to be completed • Development of an environmental sustainability strategy for all ports • Completion of a climate change adaptation strategy for all ports • Track energy and water usage (Port of Broome) • Maintenance and replacement program for assets and mobile equipment • Emissions boundary scoped for KPA and Port of Broome
Land & Seabed	Management of contaminated lands, land use	Effectively manage Port services and activities to prevent pollution of Port land and seabed and	• Lease agreements and development application process

Theme	Description	Objective	Program / Plan
	and development of PPA's ports, and contamination of marine sediments.	ensure environmental impacts of contamination are minimised.	• Audit and inspection program • Port of Broome Slipway and Site Asbestos Management Plans • Groundwater monitoring at Ports of Broome and Wyndham • Asbestos registers
Noise	Noise emissions associated with port operations	Minimise impacts to the community from site sourced noise emissions.	• Development application process • Review of any changes or new products entering the ports • Audit and inspection program • Monitor any community feedback or concerns
Waste	Physical waste generated through the Ports operations	Reduce the volume of wastes generated by KPA services and activities that require disposal to landfill or specialised treatment.	• Local marine notice (Port of Broome) • First Point of Entry (Biosecurity Waste) • Audit and inspection program
Water	Quality of water that includes: • stormwater; • potable water; • marine water; and • ground water.	Effectively manage port services and activities to ensure water resources are: • used efficiently and protected and • maintain long-term security of marine waters for KPA activities.	• Marine monitoring program at Port of Broome • Groundwater monitoring program at Ports of Wyndham and Broome • MOU's for marine parks • Emergency response plans and preparedness • Review stormwater management processes • Track water usage and install additional remote meters (Port of Broome)

5. OPERATION

5.1. Emergency Preparedness and Response

KPA's emergency preparedness and response program has the following key elements:

- **Emergency Response** – the initial onsite response which focuses on the preservation of life, the protection of property and environment, and the prevention of escalation.
- **Incident Management** – the response to an incident by KPA.
- **Business Continuity Management** – in the event of an interruption to KPA's services and activities, a business continuity response may be required to assist in returning to business as usual.

At the Port of Broome, KPA has an Emergency Response Plan (**ERP**) and a Marine Oil Pollution Contingency Plan (**MOPCP**).

Department of Transport is planning a maritime environmental emergency response exercise with KPA in Broome in 2023.

Port operators at the Ports of Wyndham, Derby and Yampi Sound are required to have ERP's under their respective commercial or lease agreements. KPA will continue to liaise with these ports to ensure adequate measures are in place and to provide additional support, eg through resources or equipment where appropriate and if required. In addition, KPA is reviewing its business continuity and crisis management plan to ensure potential scenarios at all ports are captured.

6. SUPPORT

6.1. Resources

At the Port of Broome, KPA maintains a management structure that supports the effective planning and execution of environmental management across Port lands/waters. Employee roles have documented responsibility in protecting environmental values.

Other resources required for the implementation of this EMP (eg monitoring programs, use of specialist environmental consultants etc) are assessed and planned for during the annual budgeting process. This includes identifying environmental resources that may be required to support activities at the Ports of Wyndham, Derby and Yampi Sound.

6.2. Training and awareness

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

Array from State Wide Array Surveillance program (SWASP) after two month soaking period under wharf (Port of Broome)

6.3. Communication

KPA has a communications plan for stakeholders which includes internal and external communication, using a range of communication methods.

KPA's main forum for information exchange with the community is through the Community Consultation Committee (**CCC**) for each port. This forum provides an opportunity to share information and provide mechanisms for feedback with the local community in which KPA operates. KPA also communicates key information on its environmental performance to port stakeholders via its Annual Report, specific project updates and website.

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 website. Environmental alerts and notices are also provided to KPA employees and discussed at toolbox talks when required.

6.4. Documents and Records

KPA has an electronic document archive system and KPA's EMP and associated records are kept in accordance with KPA's Record Keeping Procedure.

Port of Broome

7. PERFORMANCE EVALUATION

KPA has implemented a range of environmental monitoring programs, some of which have been identified in Section 4. Monitoring programs at KPA have been implemented either due to:

- Legal requirements: where KPA is bound to undertake monitoring under statutory approvals issued to the organisation under environment and/or cultural heritage legislation; and/or
- Best practice: where the aspects and impacts of delivering KPA's services and activities have been analysed through the risk management process and a monitoring program has been established to characterise and monitor the quality of the environment in response to these.

KPA communicates the key outcomes of its environmental monitoring programs through various processes and stakeholder forums established under KPA's Stakeholder Engagement and Communications Strategy (e.g. CCC).

By routinely evaluating the results of its environmental monitoring programs against its environmental objectives, KPA is able to effectively monitor, report and continually improve the overall performance and effectiveness of its EMS.

7.1. Monitoring, Measurement, Analysis and Evaluation

KPA has the following monitoring programs for the Port of Broome:

- **Marine Baseline and Ongoing Monitoring Program** – 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 is now undertaking an ongoing marine monitoring program;
- **Invasive Marine Pest Species Monitoring 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 from the wharf and shore line monitoring; and
- **Groundwater monitoring** – KPA currently undertakes six monthly monitoring of its groundwater.

7.2. Evaluation of Compliance and Auditing

KPA maintains a process for periodically evaluating its compliance with legal and other requirements (see Section 4.1).

KPA maintains an internal audit program, which includes audits on KPA's EMS. These audits can be conducted by KPA or external parties.

7.3. Hazard and incident reporting

KPA's processes for managing environmental hazards and incidents at the Port of Broome are documented in KPA's Hazard and Incident Reporting Procedure. All environmental hazards and incidents are reported and communicated via KPA's online reporting tool, with actions tracked and monitored in this system. Information on environmental hazard and incident reports are provided to

the workforce via alerts, toolbox talks or the HSE Committee meeting to ensure any lessons learned are disseminated to employees and other stakeholders where appropriate.

Port operators at the other ports are obligated under their respective management agreements to report hazards and incidents on a regular basis.

7.4. Document review

This EMP is reviewed annually to ensure KPA's environmental objectives and plans remain current.

Feather Stars (Cenolia), Port of Broome waters