



ENVIRONMENTAL MANAGEMENT PLAN

JANUNARY 2026

**AAT
APPLETON DOCK**

Signed:

Managing Director - AAT

Date:

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CONTACT NAMES AND PHONE NUMBERS

KEY PERSONNEL AND REGULATORY AUTHORITIES

ORGANISATION	POSITION	PHONE (BH)	PHONE (AH)	FAX
AAT	Managing Director	02 8346 2304	0418 534 897	02 8346 2350
AAT	Terminal Manager	03 8698 6936	0457 617 446	03 8698 6950
AAT	OH&S & HR Coordinator	03 8698 6930	0409 743 147	03 8698 6950
POM	Port of Melbourne Emergency Contact	03 9689 0224		
POM	Emergency Services Operational Line to Melbourne VTS	03 9644 9778		
VIC EPA	Environmental Protection Authority Victoria	1300 372 842 03 9695 2777		
Fire and Rescue Services	Hazardous Materials Response	03 9662 2311		
AMSA (Australian Marine Safety Authority)	Safety Coordinator	1800 641 792		
Melbourne Water	Water Difficulties & Emergencies	131 722		
Work Safe VIC	Inspector	03 9223 6888		
Police		000		
Ambulance		000		

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1. Introduction

1.1 Purpose of this Document

This Site Environmental Management Plan (EMP) has been prepared in order to provide all personnel from the AAT Appleton Dock with sufficient knowledge and appreciation of environmental issues to:

- ensure that the environmental impacts associated with our activities are minimised;
- ensure compliance with environmental laws, policies and procedures;
- provide adequate training on environmental awareness at all levels;
- establish a formal reporting and document control system; and
- to continually improve our environmental performance within the Port of Melbourne and to strive for best practice environmental management.

The Site EMP is designed to ensure compliance with Commonwealth, State and Local Council requirements pertaining to the management of environmental issues such as waste management, emissions and other environmental impacts.

1.2 Scope

The plan provides details of environmental commitments associated with onsite operations. The plan identifies potential environmental impacts during the operations phase, and specifies details of proposed pollution control measures and strategies adopted to minimise any detrimental effects to the environment. The plan also includes information on incident/risk management procedures, and highlights individual responsibilities for plan implementation and methods for performance monitoring and EMP review.

The Site EMP is a dynamic document which provides a central reference for environmentally related matters.

1.3 EMP Objectives

In line with AAT Environmental Sustainability Policy, the main objectives of the EMP is to:

- Identify AAT's Environmental Objectives and Policies.
- Ensure compliance with applicable environmental legislation and existing Corporate and Government guidelines;
- Identify existing and potential risks to the environment from operations.
- Analyse details of environmental aspects and impacts associated with our activities and management strategies for ensuring that these impacts are minimised;
- Summarise existing emergency procedures and outline further incident management requirements.
- Outline procedures for dealing with site modifications, such as new capital projects and the appointment of new contractors;
- Analyse requirements for training regarding site environmental issues;

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- Outline procedures for internal and external communications and reporting regarding environmental issues; and
- Identify those responsible for plan implementation and management.
- Update and maintain records, performance monitoring procedures.

The Environmental Management Plan is to be used as a “tool” by all personnel who have duties at Appleton Dock which have the potential to impact on the environment, or which are controlled by environmental statutes/regulations.

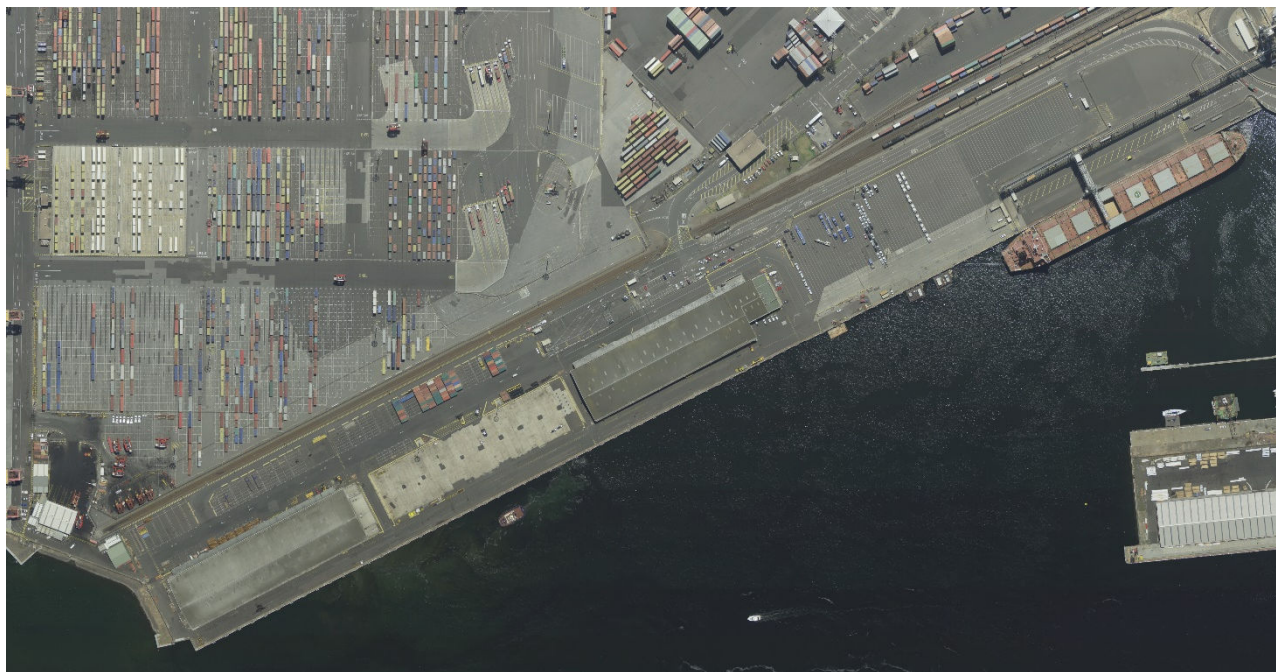
1.4 Description of Operations

AAT has entered into an agreement with the Port of Melbourne Corporation (PoMC) to manage facilities for the stevedoring of general cargo. Stevedoring operations are carried out by stevedoring companies on site.

The area is owned by the Port of Melbourne Corporation and leased by AAT, and terms of the lease requires compliance with the Environmental Management Plan (EMP) developed for the facility and approved by the PoMC.

1.5 Site Location

AAT facility is located at Appleton Dock, a river berth upstream from the mouth of the Yarra River, which flows into Port Phillip Bay.



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2. OPERATIONAL ACTIVITIES

AAT manage facilities for the operation of an automotive and general cargo handling terminal.

The terminals major activities include the following;

2.1 General Cargo

General cargo is imported and exported to and from the site via ship. Ships dock at Appleton Dock and cargo is loaded / unloaded onto the wharf apron by ship's crane and/or Roll on Roll Off (RO/RO).

Imported cargo discharged from the ship is transferred to onsite storage areas by forklift. All weather sensitive cargo is stored inside cargo sheds for protection against weather.

Cargo is collected and transported offsite by road transport. Truck loading is carried out by forklifts directly adjacent to the onsite storage areas.

Cargo for export is transported to site by road transport, unloaded and transferred to the onsite storage areas by forklift. At the time of export, cargo is transferred to the wharf front by forklift for loading onto the ship.

2.2 Ancillary Operations & Facilities

Security Gatehouse

The security gatehouse located at the site entry is manned by security personnel between hours 06:00 and 18:00, Monday to Friday or 24-hours a day when vessel is alongside. Security personnel control all movement in and out of the site.

Administration Offices & Amenities

AAT staff manages the overall operation of the site. All AAT staff are accommodated in office /amenities buildings located within shed D.

R&D staff manages the receipt and delivery of all cargo. All R&D staff are accommodated in office building, adjacent to Enterprise Road.

Amenities buildings for stevedoring staff are located inside Shed D. Maintenance work out of defined fenced Maintenance area also located inside Shed D.

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2.3 Appleton Dock Site Layout Plan



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3. Responsibility for Maintaining this EMP

3.1 Environmental Co-ordination

The maintenance and review of this Site EMP is the responsibility of the Managing Director and the Appleton Terminal Manager. More specifically, it is the responsibility of the Terminal Manager to:

- Ensure the Site EMP remains current by implementing any changes required and provide relevant personnel with a copy of updated pages;
- Ensure changes in laws and regulations which may affect the operations of the facility are promptly reflected in the master copy of the Site EMP and that the revised pages are distributed accordingly; and
- Review the Site EMP at least annually in consultation with senior management and other stakeholders as appropriate. Any changes which may be required due to changed operating procedures, changed processes or materials and the like will be implemented immediately.

3.2 Terminal Manager

It is also the responsibility of the Terminal Manager to provide each relevant personnel with a copy of the Site EMP; and

- Identify work areas or defined areas of responsibility which have the potential to generate emissions which may not comply with consents, licenses, permits or regulatory standards issued by regulatory authorities, and provide personnel with copies of these documents for ready reference
- familiarise themselves with the content of the Site EMP; and
- ensure that the employees who report to them understand the contents of the Site EMP which applies to their work area.

3.3 All Personnel

All personnel employed at the AAT Appleton Dock facility have a responsibility to assist in minimising the impact of the facility on the environment and in maintaining compliance with regulatory requirements. By conduct activities in accordance with relevant EMP Procedures, being aware of Environmental Sustainability Policy and reporting environmental incidents.

3.4 Reference Documents

AAT Environmental Sustainability Policy 2022
Lease Agreement with Port of Melbourne Corporation

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4. Environmental Sustainability Policy

Australian Amalgamated Terminals (AAT) operates multi-user shipping terminals in various major ports across Australia. AAT recognises the importance of environmental sustainability and is committed to conduct its operations in consideration of its environmental and social responsibilities.

AAT's commitment to sustainability is based on an understanding that environmental impact must be assessed regarding all operational and development activities, and extends this understanding to:

- Providing Terminal users world class services of sustainable performance
- Enhance communities with operations that improve operational efficiencies whilst considering environmental impact
- Minimise environmental impact through efficient resource allocation
- Pursue continual process improvement with Business Process Management initiatives aimed at improving efficiency and reducing environmental impact
- Appoint experienced consultants to assist with current and future terminal development planning in consideration of environmental impact and long-term sustainability
- Regularly review AAT's sustainability policies and procedures to ensure they continually adhere to relevant legislation

All AAT business units are accountable for the implementation of the AAT Sustainability Policy in addition to driving continual improved sustainability initiatives.

AAT's Managing Director is responsible for the review and approval of AAT's Sustainability Policy and ensuring the policies for sustainability are being considered and met.

5. Legislation, Regulations, Policies and Procedures

The following regulations, policies and procedures apply to our organisation's activities within the Port of Melbourne. Management Issues and Strategies section of this document outlines the strategies that our organisation will implement to ensure that all relevant statutory requirements are fulfilled.

INTERNATIONAL	
International Maritime Dangerous Goods Code 2020 (IMDG Code)	Transit of DG through AD site
FEDERAL	
Environmental Protection Regulations 2021	Waste water management – wash bay
Biosecurity (Reportable Biosecurity Incidents) Determination 2016 (Commonwealth)	Applies to cargo requiring AQIS approval
Ozone Protection and Synthetic Greenhouse Gas Management Act 1989	Replace ozone depleting substances if possible
Ozone Protection and Synthetic Greenhouse Gas Management Regulations 1995	As above
Hazardous Waste (Regulation of Exports and Imports) Act 1989	Review the quarantine waste removal contractors
Biosecurity (Consequential Amendments and Transitional Provisions) Act 2015	AD needs to obey biosecurity directions
Road Transport Reform (Dangerous Goods) Act 1995	Applies to DG transiting AD

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STATE	
Climate Change Act 2017	Need to adhere to reduction targets set by Vic state government
Dangerous Goods Act 1985	Applicable for DG transit through AD site
Victorian Energy Efficiency Target Act 2007	Encourages reduction of gas and electricity
Water Act 1989	Promote the equitable and efficient use of our (Victoria) water resources. make sure our water resources are conserved and properly managed for the benefit of all Victorians. Increase community involvement in conserving and managing our water resources AD needs to aim to reduce water consumption
VIC REGULATIONS	
Dangerous Goods (Storage and Handling) Regulations 2012	Parts 4&5 Duties of Occupier
Dangerous Goods (Transport by Road or Rail) Regulations 2018	Applicable for DG transit through AD site
Dangerous Goods (Explosives) Regulations 2022	Applies to DG explosives transiting through AD Site
Environment Protection (Vehicle Emissions) Regulations 2013	<i>Applies to vehicle standards</i>

Full text copies of legislation can be found on the Australian Legal Information Institute Web Site www.austlii.edu.au.

5.1 Site Specific Procedures

Our organisation AAT Pty Ltd has developed site-specific procedures to ensure a high level of environmental performance within the Port of Melbourne. Appleton Dock is committed to applying all environmentally-related guidelines and procedures that have application to the site's operations.

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6. Summary of risks and pre-emptive actions to prevent/minimise key potential environmental pollution contaminations and risks to human health

This section details environmental issues associated with terminal operations and requirements for environmental protection.

6.1 Risk Assessment of Main Hazards to Contamination of the Environment and Human Health.

POTENTIAL RISKS	POTENTIAL CONSEQUENCES	RISK LEVEL TO ENVIRONMENT	RISK LEVEL TO HUMAN HEALTH
Fuel Storage Leaks	Land Contamination Storm water Contamination		
Diesel storage		Medium	Low
Unleaded storage		Medium	Low
Stored Chemical Leak	Land Contamination Storm water Contamination	High	Medium
Refuelling Leak	Land Contamination Storm water Contamination	Medium	Low
Broken Machinery Hydraulic Hoses Leaking Oil	Land Contamination Storm water Contamination	Medium	Low
General Waste and litter	Storm water Contamination	Low	Low
Workshop Waste	Land Contamination Storm water Contamination	Low	Low
Machinery Exhaust Emissions	Air Contamination	Low	Medium
Bulk Cargo Operations	Land Contamination Storm water Contamination Air contamination	Low	Low
Emission from a Fire Event	Land Contamination Storm water Contamination Air contamination	High	High

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6.2 Summary of Key Environmental Issues

This section details environmental issues associated with terminal operations and requirements for environmental protection.

6.2.1 Stormwater Quality

Operations on site have the potential to impact the water quality of the river through the discharge of pollutants through the stormwater system.

Table 2: Potential Stormwater Pollution Issues and Pre-emptive measures

ISSUE	PRE-EMTIVE MEASURE
Catchment Area: Terminal Potential pollutants: Debris / general litter Suspended solids Fuel / hydrocarbons from operational fleet and/or refuelling activities	Stormwater is captured within the facility by a series of grated storm drains and directed through pipes and pits. Spill response kits, are stored in strategic locations. In the event of a spill trained staff will deploy the appropriate equipment.

6.2.2 Land Contamination

Operational activities may potentially cause land contamination, particularly in the event of a fluid spill from operational equipment. Table 3 summarises potential land contamination issues during operations, and methods to prevent detrimental effects.

Table 3: Potential land contamination issues and Pre-emptive measures

ISSUE	PRE-EMTIVE MEASURE
Fuel / Fluid leaks from storage, operations or during refuelling; Fleet whilst refuelling Fleet in maintenance area during maintenance procedures	The majority of the site surfaces are asphalt and concrete. The risk of land contamination in the event of a spill is low as all pavements are impervious and prompt spill response will prevent fuel / fluids penetrating the pavement to significant depth. Any fuel spill event during refuelling of operational fleet is addressed in accordance with procedures detailed in the AAT Emergency Response Procedure Manual. Plant / equipment used onsite is regularly maintained to prevent leaking fuel, oil or chemicals. Spill Response Kits including absorbent material are kept on site for use in the event of product spills. Spill response kits, spill response trailer are stored in strategic locations. In the event of a spill trained staff will deploy the appropriate equipment.

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6.2.3 Air Contamination

Operational activities may potentially generate dust and vehicle emissions that may have a detrimental effect on the environment and neighbouring properties, and the adjacent inner river waterway. Table 4 summarises potential air quality issues during operations, and management measures methods to prevent detrimental effects.

Table 4: Potential air quality issues and Pre-emptive Measures

ISSUE	PRE-EMTIVE MEASURE
Exhaust emissions from plant and equipment	Plant / equipment used onsite is regularly maintained to prevent excessive exhaust emissions. Plant / equipment will not be left idling when operations permit.
Emission from a fire event. Areas of concern include: Cargo storage (break bulk) Mobile fleet and fuelling equipment Building infrastructure	Firefighting equipment located in various locations in accordance with the BCA. Details of equipment are specified in the AAT Emergency Response Plan. Rapid containment and extinguishing of fires prevent air pollution events. The possibility of electrical system malfunction may lead to localized equipment fires. Equipment is maintained regularly to prevent malfunction. Rapid response measures to fire situations are set out in the Emergency Response Plan.

6.2.4 Waste Management

Operation of the site generates some waste, which if not properly managed, may escape into the environment and cause detrimental effects. Waste generated from site operations includes: -

- Maintenance Workshop waste
- General Office / Amenities waste
- General garbage / litter

Details of waste types generated and management procedures are summarised in Table 5.

Table 5: Potential waste management issues and Pre-emptive Measures

ISSUE	PRE-EMTIVE MEASURE
Maintenance Workshop Waste	Waste products from equipment and vehicle maintenance operations will generally include: –Damaged and replaced parts and tools –Discarded fluids and lubricants –Empty containers and packaging –General garbage Discarded fluids and lubricants are stored in sealed storage tanks located within a bunded area at the maintenance workshop. The storage tanks are regularly removed by a licensed waste contractor. General garbage is disposed in general waste bins to be removed by Licensed Contractor.
Fuel Spill Waste	Any fuel spill event during refuelling of operational fleet is addressed in accordance with procedures detailed in the AAT Emergency Procedures Manual. Any products used in the containment / cleaning of a fuel spill are stored in sealed chemical waste drums and promptly removed by licensed waste contractor.
General Office / Amenities waste	General office waste generation is minimised through the use of office and amenities product refills where possible. General waste bins are provided in all office, amenities and recreational areas.
Quarantine /Waste Disposal	All waste is removed from site by licensed waste contractors on a regular basis, and disposed offsite and relevant tracking evidence and record evidence of approved disposal.

6.2.5 Noise Management

The site is not in close proximity to any sensitive noise receptors. Noise emissions created by operations onsite are not excessive in relation to the existing port environment.



Details of noise emission issues and management controls are summarised in Table 6

ISSUE	PRE-EMPTIVE MEASURES
Noise from various operational activities, equipment and plant	Equipment and plant are regularly maintained to ensure efficient operation.

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7. Radiation Risk Management (NORM: Uranium/Thorium in Mineral Sands)

Objective

Manage radiological risks from Naturally Occurring Radioactive Materials (NORM) in processed mineral sands to protect workers, the public, and the environment, consistent with ISO 14001:2015 and Victorian legislation.

Roles and Responsibilities (ISO 14001:2015 — Clauses 5.3, 7.4, 8.1)

AAT (Terminal Operator)

- Ensure Iluka and Qube Bulk operations comply with radiation safety requirements at AAT sites.
- Operate under Qube Bulk's Radiation Management Licence (Licence No. 300090210) and maintain documented communication pathways per AAT's Stakeholder Engagement & Communications Plan. Note: Victorian management licences authorise the practice, specify sites/sources, and impose conditions.
- Maintain awareness of compliance obligations and communicate relevant requirements to interested parties (e.g., contractors).
- Compliance to AAT Stakeholders Engagement & Communications Plan

Qube Bulk (Licence Holder)

- Hold and maintain a valid Radiation Management Licence for the relevant practices and sites; ensure reporting to the Victorian Department of Health, Ports Victoria, and other agencies as required by licence conditions and law.
- Provide AAT written confirmation of notifications and compliance actions following incidents

Risk Identification and Assessment

- Radiological risks associated with mineral sands operations have been identified, assessed, and documented in the site risk register.
- Regular monitoring will be conducted under the Iluka Radiation Management Plan. AAT will request confirmation of monitoring results and any additional information necessary to maintain a safe workplace.

Operational Controls & Monitoring (ISO 14001:2015 — Clause 8.1; Clause 9.1)

Operational Controls:

- Implement and maintain procedures for receiving, handling, storage, and transfer of mineral sands to minimize exposure and prevent contamination; verify contractor controls and site access rules.

Radiation Monitoring

- AAT will request and retain regular confirmation of monitoring results under the Iluka Radiation Management Plan, including personal and area monitoring where applicable.

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Victorian RMP Expectations

- Ensure the licence holder's Radiation Management Plan covers sites/sources, floor plans, training and competency matrices, PPE/dosimetry, monitoring equipment calibration, and acquisition/disposal procedures, and that it is embedded in document control and periodically reviewed.

Performance Evaluation:

- Record and review monitoring data, incidents, and corrective actions; evaluate compliance and EMS performance at defined intervals

Emergency

In a radiation-related emergency (e.g., spill, loss of control) is covered in the site Emergency Response Plan and includes:

1. Immediate Control Measures: If safe, increase distance, use available shielding/barriers, and secure the area to reduce exposure.
2. Evacuation: Move personnel away from the affected area; restrict access and implement contamination controls.
3. Notification: After immediate action, AAT will contact Qube Bulk (Licence Holder) and follow licence-holder directions for regulatory notifications. Victorian law requires licensed management of practices and timely incident reporting consistent with licence conditions.
4. Reporting & Remediation: Ensure incidents are documented; Qube Bulk to notify regulatory bodies (Department of Health, relevant port/agency) and coordinate remediation consistent with Victorian requirements and ARPANSA guidance.
5. Post-Incident Review: Record nonconformities and corrective actions; update procedures and training based on lessons learned (ISO 14001 — Clauses 9.1.2, 10.2).

Records & Evidence (ISO 14001:2015 — Clause 7.5)

Maintain controlled records for: risk assessments, licences, RMPs and revisions, monitoring results (personal/area), incident/notification logs, training/competence matrices, audits, and corrective actions.

Roles & Reporting Matrix

ROLE	KEY RESPONSIBILITIES	REPORTING / EVIDENCE
AAT (Terminal Operator)	Site controls, verification of monitoring, emergency first actions, communications	Risk register entries; monitoring confirmations; incident logs; EMS records
Qube Bulk (Licence Holder)	Maintain licence and RMP; conduct statutory	Current licence; RMP; regulator notifications; remediation plans

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	notifications; provide confirmations to AAT	
Iluka	Provide monitoring and RMP updates, SDS and transport compliance info	RMP/standard; monitoring reports; SDS; transport compliance evidence
Regulator (Vic Dept. of Health)	Licence issue/conditions; oversight of compliance; RMP requirements	Radiation Act 2005; Radiation Regulations 2017; RMP guidance

Reference Documents

- ISO 14001:2015 - Implementation and clause overviews: NQA Implementation Guide; Advisera Knowledge Base.
- Victoria - Radiation framework & licensing: Department of Health (Radiation Act 2005; Licensing; Radiation Management Plans); Radiation Regulations 2017.
- ARPANSA - Radiation Protection Series (RPS 15): Management of Naturally Occurring Radioactive Material (NORM).
- Qube Bulk - Radiation Management Licence (2025)
- Qube Bulk - Transport Radiation Management Plan (2025)
- Iluka - Radiation Management Plan (2024)
- Iluka - Naturally Occurring Radiation & Mineral Sands Fact Sheet (2017).

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8. Management Issues and Strategies

8.1 Identification of Environmental Aspects and Impacts

FACILITY – APPLETON DOCK								
Activity or Service	Significant Environmental Aspects Identified (Cause)	Significant Environmental Impacts Identified (Effect)	Environmental Legislation pertaining to Impact	Environmental Licenses held by the facility which relate to the Activity /Service	Is site compliant with all licence conditions and/or other environmental legislative requirements	Financial Penalty incurred for non-compliance Yes/No (include any notices served by EPA / Council and details of penalty)	Significance of Impact (refer to Appendix B for risk assessment calculation procedure)	Priority to action impact E=extreme H=high M=moderate L=low)
Mass Movement of Vehicles & Mobile Plant	Leakage/spillage of hydrocarbons	Contamination of waterways via stormwater drains	Environment Protection Act 1970 (and subordinate legislation) Pollution of Waters by Oil And Noxious Substances Act 1986 (and subordinate legislation)	No EPA Licence assessed as being currently required for this site	Not all environmental legislative requirements	No	5 + 3 = 8	E
	Fuel consumption	Oil Consumption Non Renewable Resource	EP ACT including, Environment Protection (Environment and Resource Efficiency Plans) Regulations 2007	No EPA Licence assessed as being currently required for this site	Not all environmental legislative requirements	No	5 + 3 = 8	E
	Exhaust Emissions, release of particulates/ CO2/ metals	Air Pollution – local/regional/ global – Greenhouse gas emissions	Environment Protection Act 1970 (and subordinate legislation, including Environment Protection (Vehicle Emissions) Regulations 2013)	No EPA Licence assessed as being currently required for this site	Not all environmental legislative requirements	No	5 + 2 = 7	H

	Noise generations – reverse sirens, engine noise, emergency alarm	Noise pollution	Environment Protection Act 1970 (and subordinate legislation)	No EPA Licence assessed as being currently required for this site	Not all environmental legislative requirements	No	4 + 2 = 6	M
Terminal Management	Use of scarce resources including Water Consumption Electricity Consumption & Fuel Consumption	Depletion of Natural Scarce Resource Greenhouse contribution	Environment Protection Act 1970 (and subordinate legislation including Environment Protection (Environment and Resource Efficiency Plans) Regulations 2007)	No EPA Licence assessed as being currently required for this site	Not all environmental legislative requirements	No	5 + 4 = 9	E
	Use of scarce resources including Water Consumption Electricity Consumption & Fuel Consumption	Depletion of Natural Scarce Resource Greenhouse contribution	Environment Protection Act 1970 (and subordinate legislation including Environment Protection (Environment and Resource Efficiency Plans) Regulations 2007)	No EPA Licence assessed as being currently required for this site	Not all environmental legislative requirements	No	3 + 2 = 5	M
	Litter Control Generation of Non-Recyclable Wastes & Recyclable Wastes including paper and plastic wastes	Treatment and final disposal – Landfills	As above	No EPA Licence assessed as being currently required for this site	Not all environmental legislative requirements	No	5 + 2 = 7	H

8.2 Management Strategies

The below is a summary of the Risk Control Measures required from the previous section together with additional Environmental Improvement Targets required within the compliance audit report.

SITE ENVIRONMENTAL IMPROVEMENT PROGRAM & OTHER TARGETS

NAME OF SITE: APPLETON DOCK

Activity & Aspect	Objective	Significance of Impact and Priority for Action	Action	Target Date	Person Responsible	Date Completed
Terminal Management	Reduce the use of scarce resources including Water, Electricity and Fuel	H (9)	Implement the cost-effective measures to minimise water, electricity and fuel consumption through education programs, replacement of faulty or poor performing equipment with energy/water efficient items/measures and investigation of resource conservation devices.	1 December 2023	Terminal Manager	30 January 2024

	Minimise the quantity of waste being sent to landfill by identifying and implementing effective recycling programs	H (8)	Opportunities to reduce the quantity of wastes that require landfill disposal and the potential for reducing the amount of wastes generated at the site will be undertaken. Measures to recycle paper/cardboard, plastics, timber and metal products will be implemented and opportunities for reducing the quantities of hazardous wastes and waste water effluent through treatment and re-use will also be investigated. Set target of reducing wastes to landfill by 20% per year over the next three years.	1 September 2020	Terminal Manager	1 October 2024
Activity & Aspect	Objective	Significance of Impact and Priority for Action	Action	Target Date	Person Responsible	Date Completed
Mass Movement of Vehicles & Machinery	Minimise Leakage/spillage of hydrocarbons and prevent spills from entering stormwater drains	E (8)	Develop an appropriate preventative maintenance schedule for all plant and equipment to minimise the risk of oil/fuel leaks and implement appropriate procedures for the prevention of spills from entering any stormwater drains through immediate action to arrest leaks when they are identified.	1 January 2015	Terminal Manager	Completed: 1 January 2015 Reviewed: 27 May 2022
	Reduce fuel consumption within plant and equipment used at the site and reduce air emissions	E (8)	Consideration will be given to cleaner fuel substitution where practicable and future equipment purchases will consider more fuel efficient and cleaner fuel options where available.	1 December 2023	Terminal Manager	15 December 2023
	Noise generations – reverse sirens, engine noise, emergency alarm	M (6)	Conduct a review of activities that generate high noise levels to determine whether any these give rise to complaints from surrounding residents. Develop appropriate procedures and employ best available technology to minimize the level of noise generated by site activities.	01 May 2026	Terminal Manager	01 May 2016

9. Inventory of Potential Pollutants

A list of potential site pollutants is contained within the site Safety Data Sheet Register; these lists are maintained at Security Gate House and AAT Offices.

The location of these potential pollutants are shown on the SDS register.

The inventory and location of cargo storage including Hazardous and Non hazardous can vary depending on import/export volumes. Details of inventory and location are available within the terminal cargo tracking system "JMT". This list of cargo and location is available for emergency services at AAT Security Gatehouse and offices.

10. Safety Equipment

The site maintains firefighting equipment, including hydrants, hoses and extinguishers in accordance with current regulations.

Location of this equipment is identified on the Sites Emergency Response Maps.

SDS information is maintained and available at Security Gate House and AAT Offices.

All chemical and fuel storage facilities are fully bunded to comply with current regulations.

PPE is a site requirement to meet the WHS recommendations at all times.

Spill containment kits are maintained and located at various points within the facility, their location is also shown on the Site Emergency Response Maps.

11. Contact Details and Communicating With Neighbours

Agencies which have to be notified immediately in the event of a pollution incident where there is a risk of material harm to the environment include Port of Melbourne, WorkSafe VIC and VIC Fire and Rescue.

Terminal contact details, emergency contacts and the above-mentioned agencies are included emergency contacts within AAT's emergency response procedures.

Due to the industrial location of the facility and significant distance from residential areas AAT does not believe its operations pose a pollution risk to local residential community.

AAT's industrial neighbours and relevant contact details are also included in the Emergency Contacts.

12. Minimising Harm to Persons

AAT maintains emergency response procedures including activation of evacuation alarms and gives clear directions for muster locations. Emergency evacuation drills are conducted on a periodic basis.

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13. Actions to Be Taken During or Immediately After a Pollution Incident

In the event of major oil, chemical or other fluid spill PoMC shall be contacted immediately on 03 96449777

For landside incidents AAT maintains various emergency response procedures including:

- Emergency Response Plan
- Fire Actions
- Serious Injury/Illness Actions
- Environmental/Hazardous Spill- Gas/Liquid/Solid
- Structural Fault
- Armed Hold Up
- Bomb Treat
- Civil Disorder
- Terrorist Attack

The hazardous procedure details who should be contacted in the event of a pollution incident. Terminal contact details, emergency contacts and contacts of neighbouring businesses are included emergency contacts within emergency response procedures.

14. Performance Monitoring and Record Keeping

Environmental protection control measures outlined in this document are monitored on a periodical basis by completion of a Site Safety Survey in order to ensure that EMP objectives are being met, and any problems are detected and rectified as soon as possible.

This section identifies monitoring and reporting requirements related to general activities and relevant environmental issues and links them with operational plans and schedules.

14.1 Site Safety Survey

Performance of environmental pollution control measures and general housekeeping are periodically monitored for functionality and serviceability. Results of monitoring are recorded on a Site Safety Survey. The form specifies all items monitored and allows for observation recording of any abnormalities.

In the case of non-compliance with the register, it records the date and details of non-compliance, specifies any required action and the person(s) responsible for implementing the action. Rectification works are signed off by the Terminal Manager. This process is conducted under AAT's Site Safety and Housekeeping Procedure.

Checklists and non-compliance forms are filed and kept onsite.

As required a summary report is prepared outlining:

- Date of checks/Checking personnel
- Details of problems identified
- Details of action taken to rectify problems
- Report of results of actions

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14.2 Environmental Incident Reports

All environmental incidents are to be reported to AAT Management in accordance with AAT's Incident Reporting Procedure.

In the event of an incident, details are recorded on an Incident Register Form. The form registers the date and details of the complaint/incident, and specifies any required action and the person(s) responsible for implementing the action. All completed forms are filed in a dedicated Complaint / Incident Register File kept onsite.

14.3 Record Management

All of the above mentioned report forms and documentation are stored onsite. The information is available to any authorised inquirers upon request. All records are kept in the system for a minimum of two (2) years.

14.4 Complaints Handling

All complaints in relation to the operation of the AAT Facility are received and registered by the Port of Melbourne and referred to the relevant party for action. Upon receipt of a complaint from PoMC the following action shall be taken:

1. Investigate the validity of the complaint.
2. Implement corrective actions as appropriate.
3. Advise PoMC of the outcome of the investigation and any actions taken.
4. PoMC provides feedback to the complainant.

Contact details for complaints are as follows:

Phone: Andrey Alekseev
Email: andrey.alekseev@aaterminals.com.au
Address: 59 Appleton Dock Road
West Melbourne VIC

14.5 Site Modifications

The introduction of new or modified processes or equipment provides an opportunity for well-established environmental practices and procedures to be disrupted, frequently resulting in environmental incidents or breaches of regulations. The following guidelines are designed to minimise the environmental risks associated with such developments.

14.5.1 New Projects

Installation of new equipment or processes, or modifications to existing facility processes including procurement of new chemicals will require a review of current environmental permits and compliance programs. Personnel responsible for implementing process changes are to contact the Environmental Co-ordinator for a review of applicable regulations and potential licence/permit modifications.

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14.5.2 Appointment of New Contractors

The use of Contractors on the site is an established practice for many activities. However, in order to ensure the integrity of environmental management and compliance systems it is vital that all contractors are aware of the potential environmental risks that their activities may introduce.

All staff that are responsible for the supervision of contractors must ensure that the work to be undertaken is fully reviewed in terms of its potential environmental impact and that in the planning stages precautions are devised to minimise those impacts.

Prior to commencing work, contractors and their employees must be fully briefed concerning the environmental issues relevant to the work area and be familiar with the chain of command and reporting procedure to be followed in the event of an environmental incident.

All chemicals to be used by the Contractor must be reviewed by the Environmental Co-ordinator for acceptability and compliance with the approved list of Chemicals. Contractors must be specifically instructed not to dispose of used chemicals or waste products without the authority of the supervising staff member.

14.6 Emergency Preparedness

Emergency Response for environmental incidents is covered in the site Emergency Response Plan. This plan details the steps to be taken in relation to incidents that may have an adverse impact on the environment. Spill kits are maintained and located around the facility.

14.7. Training

AAT employees at all levels are provided with training in order to enhance their understanding of environmental issues and the impact which they and their work may have on the environmental performance of the facility. Such training is provided at the employee induction stage.

The training encompasses the following topics:

- Environmental Sustainability Policy
- Relevant operating procedures
- Roles and responsibilities in achieving conformance with the EMP
- Emergency preparedness and response

Additional environmental training will be identified and undertaken for employees whose tasks may have a direct impact on a significant environmental aspect.

14.8. Communication

Environmental communications shall be undertaken. The main methods of communications within the site are:

- Tool box talks
- Noticeboards
- AAT Intranet
- Incident reporting system

All media enquiries shall be directed to Managing Director.

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14.9 Records

Records maintained as part of the Environmental Management Plan include:

- Legal, regulatory and other requirements such as licences, permits and approvals
- Corporate, regulatory and government communications regarding environmental management
- Environmental Aspects and Impacts Register
- Progress reports towards meeting objectives and targets of the environmental improvement programs
- Training records
- Audit reports
- Environmental incident reports
- Maintenance Records
- Environmental Complaints
- Corrective Action Register

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APPENDIX A

Procedures for the Assessment of Environmental Risk (Management and Strategies section)

Procedure/Resources used to Assess Environmental Risk

A Risk Assessment should be carried out in consultation with employees and documented on a Risk Assessment form.

The job is broken down into steps and at each step the specific risks (“What can go wrong?”) are detailed. From experience and history, the frequency and consequence of these risks are agreed and documented. Frequency and consequence describe how often it actually does happen and how serious is it when it happens. If the risk score is unacceptably high, further controls need to be introduced (planned improvements) until, when the same questions are asked (how often and how serious now), the risk score becomes acceptably low. This is repeated for each step.

The frequency and consequence ratings are described on the form, and are reproduced below (consequences only listed for environmental consequences)

TABLE 1 MEASURES OF FREQUENCY

Level	Descriptor	Example detail description
1	Rare	May only occur in exceptional circumstances (up to once every 1000 years)
2	Unlikely	Could occur some time (up to once every 100 years)
3	Possible	Might occur some time (up to once every 10 years)
4	Likely	Will probably occur at some time (up to once every year)
5	Almost certain	Is expected to occur in many circumstances (>10 times a year)

TABLE 2 MEASURES OF CONSEQUENCES

Level	Descriptor	Example detail description
1	Low	No environmental damage, no financial or reputation loss
2	Minor	On-site release of pollutant is immediately contained, minor financial and reputation loss
3	Moderate	Off-site pollutant release causing moderate environmental damage, moderate financial and reputation loss
4	Major	Off-site pollutant release causing major environmental damage, loss of production capability, major financial and reputation loss
5	Critical	Off-site pollutant release causing severe environmental damage, huge financial and reputation loss

RISK RANKING MATRIX

LIKELIHOOD	CONSEQUENCE				
	Low 1	Minor 2	Moderate 3	Major 4	Critical 5
Almost Certain 5	M (6)	H (7)	E (8)	E (9)	E (10)
Likely 4	M (5)	M (6)	H (7)	E (8)	E (9)
Possible 3	L (4)	M (5)	M (6)	H (7)	E (8)
Unlikely 2	L (3)	L (4)	M (5)	M (6)	H (7)
Rare 1	L (2)	L (3)	L (4)	M (5)	M (6)

Legend:

L Low Risk - considered acceptable. No further action on Planned Improvements (PI) are necessary

M Moderate Risk - relatively acceptable. However, further PIs should be considered and existing PIs should be monitored

H High Risk - unacceptable level of risk. PIs must be developed and implemented in short to medium term

E Extreme Risk - unacceptable level of

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