



# Waste Management Procedure

## Environment

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### 1 Purpose and Scope

This procedure specifies the operational environmental requirements relating to waste management at the Roy Hill Project. This procedure applies to all personnel involved in activities at the Mine, Rail and Port operations that affect waste management.


### 2 Procedure

#### 2.1 Waste Management

##### 2.1.1 General Waste

1. Comply with the requirements of the Landfill Management Procedure (OP-PRO-00049), *Environmental Protection (Rural Landfill) Regulations 2002*, Works Approval and Operating Licences to ensure waste is managed appropriately.
2. Dispose of waste that is listed in Appendix 1 of this procedure within approved onsite Operational or offsite waste disposal areas.
3. Remove waste types that are listed within Appendix 2 of this procedure from site, and dispose of in approved offsite waste disposal areas.
4. Store waste for offsite disposal temporarily in appropriate centralised storage areas until there is sufficient quantities to complete a load out. Excessive temporary storage should be avoided.
5. Reuse concrete waste wherever possible.
6. Contain concrete wastes and concrete wash out in HDPE plastic lined bunds, which shall be constructed before concrete pouring begins and allowed to dry before being broken up and either recycled or disposed of at an approved landfill.
7. Prevent littering and keep all sites free from wind-blown waste generated through storage or transport.
8. Provide lids for waste skips and bins and keep them closed to contain litter and prevent animal access.
9. Establish waste stations around Operational sites and include sufficient and appropriate bins to facilitate segregation (e.g. green waste, general rubbish, recycling, controlled waste etc.).
10. Label all bins clearly, including waste oil storage tanks.
11. Use only appropriately licensed landfills for the disposal of general domestic solid wastes.
12. Implement the waste management hierarchy (i.e. elimination, reduction, reuse, recycling, treatment and disposal) as outlined in Appendix 5.

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### 2.1.2 Controlled Waste

1. Segregate and store chemical, hydrocarbon and other hazardous waste material appropriately before being transported for final disposal at an approved offsite location.
2. Ensure all controlled waste as defined by the *Environmental Protection (Controlled Waste) Regulations 2004* (Appendix 4) is transported off site via a licensed controlled waste carrier, where the amount exceeds 200 kg or 200 L (except where it is being transported to a Class I, II or III landfill).
3. Provide accurate information to the licensed controlled waste carrier (prior to transportation) regarding the category, quantity and type (Bulk or Packaged) of controlled waste.
4. Provide packaged controlled waste (waste transported in drums etc.) to the Carrier in a container compatible with the waste being transported.
5. Obtain a receipt with a Controlled Waste tracking number from the transport driver prior to the controlled waste being transported from site as required.
6. Manage waste from toilets and crib rooms in accordance with the *Health Act 1911* and local government guidelines.
7. Collect and remove waste solvents and hazardous liquids (including oil) from site for recycling or disposal to an approved liquids disposal facility.

### 2.1.3 Bunding

1. Store chemicals, hydrocarbons or other controlled wastes in bunded areas that comply with the requirements outlined in the Bunds, Sumps, Wash downs and Oily Water Separator Management Procedure (OP-PRO-00178).

### 2.1.4 Recyclables

1. Recycle wastes listed in Appendix 3 of this procedure where practical.
2. Implement the waste management hierarchy (i.e. elimination, reduction, reuse, recycling, treatment and disposal).
3. Undertake recycling of all commercially viable materials from work areas including steel, cables, other metals and pallets where practical.
4. Provide pre-sorting facilities for domestic waste where viable, to recover recyclables, such as glass, aluminium, plastic and cardboard, for recycling offsite.
5. Implement a procurement strategy that minimises waste generation (Appendix 5) by preferentially purchasing products, where practical, that:
  - a. Are pre-assembled off site to reduce packaging of individual items;
  - b. Are delivered in bulk packages;
  - c. Have a recyclable, reusable or recycled content;
  - d. Have long life-spans in terms of performance and durability;
  - e. Are biodegradable and/or non-toxic; and
  - f. Have packaging that is able to be reused or recycled.

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### 2.2 Training and Awareness

1. Familiarise all personnel associated with waste management activities with the requirements of this procedure.
2. Include information on waste management requirements in site inductions (e.g. waste minimisation) or site communications where relevant.
3. Conduct toolbox talks and develop environmental site notices and environmental awareness posters periodically highlighting waste management requirements – this is the responsibility of the Superintendent Environment Mine or Port and Rail (or delegate where required).
4. Display relevant environmental site notices and environmental awareness posters at prominent workplace locations.
5. Update the training records of personnel in the Learning Management System once registered training has been completed (with the exception of toolbox talks).
6. Maintain records of toolbox training attendance onsite for audit and inspection purposes.

### 2.3 Monitoring Actions

1. Undertake monitoring in accordance with approval conditions and commitments, and ensure that all data required for regulatory reporting is captured.
2. Store all monitoring records within the Roy Hill Document Management System.
3. Record weights of waste recycled and waste disposed of offsite. If only volumes are known, convert volumes to weight (tonnes) and record the conversion factor used.
4. Maintain all controlled waste receipts and tracking sheets onsite at all times for audit and inspection purposes.

### 2.4 Incidents, Audits and Inspections

1. Undertake regular inspections of the active work area against the requirements of this procedure.
2. Undertake regular compliance audits against the requirements of this procedure in accordance with the 'Environmental Audit Procedure' (OP-PRO-00018).
3. Schedule inspections and audits against the requirements of this procedure in accordance with the approved HSE Integrated Inspection and Audit Schedule.
4. Store copies of all audits and inspections within the Roy Hill Document Management System.
5. Undertake an investigation into the cause(s) of incidents reportable to regulators in accordance with the 'Incident Investigation Specification' (OP-SPC-00156) and develop actions to prevent recurrence of the incident.
6. Enter corrective and preventative actions from incidents, audits and inspections into the Roy Hill Incident Management System.

### 2.5 Contingency Actions

1. Implement contingency actions in accordance with this procedure where deficiencies are identified during inspections, audits and incident reporting.
2. Implement the 'Management of External Complaints Procedure' (EA-PRO-00002), where relevant.
3. Conduct a risk assessment to determine the most effective mitigation measures should additional contingency actions be required, and follow the change management process.

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4. Contact an appropriately trained and authorised fauna handler to translocate fauna trapped within a waste storage facility.
5. Undertake cyclone preparedness measures in respective work areas prior to and during the defined cyclone season.

### 2.6 Reporting Requirements

1. Report all non-compliances with this procedure, all regulatory exceedances and all community complaints as an incident in the Roy Hill Incident Management System.
2. Close out all incidents and corrective actions in accordance with the 'Incident, Non-Conformance and Action Management Procedure' (OP-PRO-00702).
3. Complete all reporting required within the relevant EnviroSys data entry forms or in the 'Contractor Environmental Report' (CER) (OP-FRM-00305).

## 3 Accountabilities

Unless otherwise specified, the following roles are accountable or responsible for the activities outlined in this procedure.

Role	Responsibility
General Managers	Accountable for ensuring that resources are available to support the implementation of this procedure where it is relevant to their area of responsibility
Managers	Accountable for the implementation of this procedure where it is relevant to their area of responsibility
Superintendents	Responsible for the implementation of this procedure where it is relevant to their area of responsibility
Environment Team	Responsible for review and update of this procedure

Table 1: Accountabilities

## 4 Abbreviations

Abbreviation	Definition
CCA	Copper chromium arsenate
DER	Department of Environment Regulation
HDPE	High density polyethylene
HTC	High temperature creosote
LSOP	Light organic solvent preservative
PEC	Pigment emulsified creosote
TBT	Tributyl tin

Table 2: Accountabilities

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### 5 Definitions

Term	Definition
Contractor	The person(s) bound to carry out and complete works as per a contract
Controlled Waste	Wastes that cannot be disposed of at a class I, II or III landfill sites as classified under the <i>Environmental Protection (Controlled Waste) Regulations 2004</i> . Some examples are clinical waste, hydrocarbon oil and asbestos
General Waste	Materials in the waste stream which arise from construction and operation activities. Some examples are putrescible waste, packing materials and broken timber.
Inert Waste	Wastes that are largely non-biodegradable, non-flammable and not chemically reactive. Examples are plastics and tyres.
Operational Environmental Requirements	A plan, procedure or work instruction that must be complied with.
Recyclables	Waste materials which can be diverted from the waste stream, sorted and used to produce new products. Some examples are scrap metal and LV/HV batteries.
Waste Disposer	The person responsible for the disposal of waste once it has been generated.

Table 3: Definitions

### 6 References

Document number	Title
OP-PLN-00043	Operational Environmental Management Plan
OP-PRO-00049	Landfill Management Procedure
OP-PRO-00060	Tyre Storage and Disposal Management Procedure
OP-PRO-00289	Hazardous Materials Management Procedure
OP-PRO-00178	Bunds, Sumps, Wash downs and Oily Water Separator Management Procedure
OP-FRM-00305	Contractor Environmental Report
OP-PRO-00702	Incident, Non-Conformance and Action Management Procedure
100RH-1840-CI-REP-2208	Waste Management Strategy - Roy Hill Mine
	Approved Criteria for Classifying Hazardous Substances [NOHSC: 1008 (2004)]
	<i>Environmental Protection (Controlled Waste) Regulations 2004</i>
	<i>Environmental Protection (Rural Landfill) Regulations 2002</i>
	<i>Health Act 1911</i>
	Landfill Waste Classifications and Waste Definitions (DER, 2009)
	Treatment and Management of Soils and Water in Acid Sulphate Soil Landscapes (DER, 2011)

Table 4: References

Note that up-to-date environmental documents should be accessed from the e-Care Roy Hill intranet portal to ensure that the current version is being used.

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### 7 Review

This Procedure is to be reviewed as follows:

- Following the grant of or modification to relevant approvals;
- Annually; or
- As a result of findings or actions identified through inspections, audits and incident reporting.

Reviews are to examine the appropriateness of this Procedure, taking into consideration corporate, system and compliance requirement changes since the last review was undertaken.

### 8 Appendices

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### Appendix 1 – List of wastes accepted in Roy Hill Operational waste disposal facilities

Examples of wastes accepted into Operational landfill facilities (rail camps, mine) include:

- Clean fill;
- Putrescible waste (e.g. food scraps in garbage bags, green waste, sewage plant grits/screenings);
- Cardboard;
- Glass;
- Paper;
- Plastic sheeting, pipes, conduit, bottles etc.;
- Packaging waste;
- Light globes;
- Polystyrene;
- Plasterboard;
- Textiles and cloth;
- Mattresses;
- Electrical equipment / whitegoods
- Timber (untreated);
- Bricks / masonry;
- Dry, inert construction waste;
- Dry cement / concrete;
- Blasting sand or garnet (excluding that used for stripping TBT containing paints);
- Asphalt;
- Dry paint containers;
- Animal manures and carcasses;
- Drained and mechanically crushed oil filters and rags;
- Personal sanitary materials;
- Chemical containers that have been cleaned (as well as or better than the triple rinse method referred to in the *Landfill Waste Classifications and Waste Definitions*); and
- Acid sulphate soils (once they have been treated to neutralise acid-forming potential in accordance with the *Treatment and Management of Soils and Water in Acid Sulphate Soil Landscapes* prior to disposal).

Examples of wastes accepted into Operational Tyre Disposal Facility at the mine (see Tyre Storage and Disposal Management (OP-PRO-00060) :

- Tyres (Inert Waste Type 2);
- Polyethylene pipe; and
- Conveyor rubber.

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Examples of wastes accepted into Operational Bioremediation Facility at the mine:

- Hydrocarbon contaminated soil from spills;
- Oil absorbent materials (not containing free liquids) excluding rags and oil filters; and
- Contaminated wash down material.

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### Appendix 2 - List of wastes NOT accepted in Roy Hill Operational landfill facilities

Examples of wastes not accepted into Operational landfill facilities include:

- Recyclables that can practically be recycled;
- Sewage;
- Hydrocarbons (including grease, cooking oil and solvents);
- Hazardous chemicals;
- Sewage and grease trap fluids;
- Biosolids (stabilised sewage sludge – Inert Waste Type 3);
- Oily water;
- Engine coolant;
- Biomedical / clinical waste (e.g. first aid sharps / dressings);
- Acid and alkali wastes;
- Explosive, flammable or acutely toxic wastes;
- Treated timber (CCA, HTC, PEC and LSOP);
- Controlled wastes (see Appendix 1) that are not able to be accepted into a Class II landfill, or the Roy Hill Tyre Disposal Facility;
- “Hazardous” (includes substances which are toxic, infectious, mutagenic, carcinogenic, teratogenic, explosive, flammable, corrosive, oxidising and Radioactive), “Intractable” and “Special” waste (as defined by the Landfill Waste Classifications and Waste Definitions);
- Blasting sand or garnet used for stripping TBT containing paints;
- Asbestos and other fibrous materials;
- Wet cement/concrete;
- Wet paint containers;
- Batteries; and
- Chemical containers that have not been cleaned (as well as or better than the triple rinse method referred to in the *Landfill Waste Classifications and Waste Definitions*).

A substance is considered hazardous if:

- Any of the ingredients is present in a concentration greater than the cut offs in the *Hazardous Substances Information System* which can be found at [www.ascc.gov.au](http://www.ascc.gov.au); or
- Any of the ingredients meet the requirements in the *Approved Criteria for Classifying Hazardous Substances* [NOHSC: 1008 (2004)] which can be found at [www.ascc.gov.au](http://www.ascc.gov.au).

The placement of any prohibited waste in the landfill may render the offender liable to prosecution under the *Environmental Protection Act 1986*. Any Waste Disposer found to have breached the operating requirements for the landfill or having placed prohibited waste into the landfill may have access to the landfill revoked and will be responsible for remediation of the facility and removal of the prohibited substance/ material from the area.

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### Appendix 3 - Wastes requiring recycling where practical

Examples of wastes that should be recycled where possible include:

- Scrap steel/iron;
- Wire;
- Aluminium (cans);
- Waste oil;
- Batteries;
- Electric cable;
- Concrete / bricks / masonry;
- Tyres;
- Paper/cardboard;
- Pallets;
- Mattresses;
- Polyethylene pipe;
- Glass bottles; and
- Plastic bottles.

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### Appendix 4 – Controlled Waste Listing

*Environmental Protection (Controlled Waste) Regulations 2004 – Schedule 1 – Controlled Waste Listing*

- Acidic solutions or acids in solid form
- Animal effluent or residues (including abattoir effluent, poultry, and fish processing waste)
- Antimony; antimony compounds
- Arsenic; arsenic compounds
- Asbestos
- Barium compounds other than barium sulphate
- Basic solutions or bases in solid form
- Beryllium; beryllium compounds
- Boron compounds
- Cadmium; cadmium compounds
- Ceramic based fibres with physio-chemical characteristics similar to those of asbestos
- Chlorates
- Clinical waste (medical waste)
- Cobalt or cobalt compounds
- Containers or drums that are contaminated with residues of a controlled waste
- Copper compounds
- Chromium compounds (hexavalent or trivalent)
- Cyanides (inorganic)
- Cyanides (organic)
- Encapsulated, chemically-fixed, solidified, or polymerized wastes
- Ethers
- Filter cake
- Fire debris or fire washwaters
- Fly ash
- Halogenated organic solvents
- Highly odorous organic chemicals (including mercaptans and acrylates)
- Inorganic fluorine compounds excluding calcium fluoride
- Inorganic sulphides
- Isocyanate compounds
- Lead; lead compounds
- Mercury; mercury compounds
- Metal carbonyls
- Mineral oil emulsions

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- Nickel compounds
- Non-toxic salts
- Organic phosphorus compounds
- Organic solvents excluding halogenated solvents
- Organochlorine pesticides (OCPs)
- Organohalogen compounds other than substances referred to elsewhere in this Schedule
- Perchlorates
- Phenols; phenol compounds including chlorophenols
- Phosphorus compounds other than mineral phosphates
- Polychlorinated Biphenyls (PCBs)
- Polychlorinated dibenzo-furan (any congener)
- Polychlorinated dibenzo-p-dioxin (any congener)
- Residues from industrial waste treatment or disposal operations
- Selenium; selenium compounds
- Sewage
- Soils contaminated with a controlled waste
- Surface active agents (surfactants), containing mainly organic constituents and which may contain metals and inorganic materials
- Tannery wastes (including leather dust, ash, sludge, or flours)
- Tellurium; tellurium compounds
- Thallium; thallium compounds
- Triethylamine catalysts for setting foundry sands
- Tyres
- Vanadium compounds
- Vegetable and food processing waste
- Waste chemical substances arising from research and development or teaching activities which substances are not identified or are new or the effects of which on human health or the environment are not known
- Waste containing peroxides other than hydrogen peroxide
- Waste from grease traps
- Waste from heat treatment or tempering operations containing cyanides
- Waste from the manufacture, formulation, or use of wood-preserving chemicals
- Waste from the production, formulation, or use of biocides and phytopharmaceuticals
- Waste from the production, formulation, or use of inks, dyes, pigments, paints, lacquers, or varnish
- Waste from the production, formulation, or use of organic solvents
- Waste from the production, formulation, or use of photographic chemicals or processing material

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- Waste from the production, formulation, or use of resins, latex, plasticisers, glues, or adhesives
- Waste from the production or preparation of pharmaceutical products
- Waste mineral oils unfit for their intended use
- Waste pharmaceuticals drugs or medicines
- Waste resulting from surface treatments of metals or plastics
- Waste tarry residues arising from refining, distillation, or pyrolytic treatment
- Waste, substances, or articles containing or contaminated by polychlorinated biphenyls (PCBs), polychlorinated naphthalenes (PCNs), polychlorinated terphenyls (PCTs), or polybrominated biphenyls (PBBs)
- Wastes of an explosive nature not subject to any other written law
- Wool scouring wastes
- Zinc compounds.

The above list is included as an example, so the reader should consult with the *Environmental Protection (Controlled Waste) Regulations 2004* for the latest list of controlled wastes.

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### Appendix 5 – Waste Minimisation

The Roy Hill waste management objectives are as follows:

1. Minimise waste generation.

Products can be brought to site in bulk containers where possible. Examples include;

- Delivery of diesel and oils by tanker that is pumped into bulk tanks, creating no waste containers; and
- Delivery of liquid products in 1,000 litre pods or solid products in one tonne bulky bags on pallets rather than 205 litre drums or smaller boxes.

2. Reuse where practical and possible.

Worn heavy earthmoving tyres represent a large volume and tonnage waste product over the life of mine. A number of practical uses can be made of large tyres on site. These include:

- Safety barriers and traffic delineators.
- Delineating 'dump-to' lines on the mine waste rock dump.
- Retaining walls and ramps.

3. Recycle where practical and possible.

The recycling industry is characterised by its volatility for viable markets for recyclable products. In Western Australia, isolated locations with small populations such as mines and country towns rarely generate sufficient quantities of recyclable products to make transport of these items long distances a practical solution. It is even less practical to transport these items back to regional centres or Perth, only to have them landfilled at these locations because there is no viable market for them. Roy Hill has adopted the approach that in such cases, it is more practical to landfill these products on site until the viability of alternative options is demonstrated.

4. Treatment of waste and recovery of energy.

The most common method of treating waste is some way of increasing its density. Raw waste generally has a density of only 0.25 to 0.3 tonnes per cubic metre. Compaction, chipping, bailing and crushing are all methods used in order to increase the density and dramatically reduce the volume of waste disposed to landfill.

Treatment methods proposed need to be considered based on safety, commercial and environmental aspects. For example the capital and operating cost of purchasing bailers, crushers and chippers, plus the safety aspects of operating this machinery needs to be weighed against the benefits, if all that is achieved is decreasing the waste's volume before landfilling it anyway. Having contractors bring this equipment to site does not abrogate Roy Hill's safety responsibility if a workplace accident was to occur.

Burning of waste has been used in the past to decrease its volume to landfill but greenhouse gas emissions and toxic substance emissions from burning waste has resulted in this practice no longer being regarded as environmentally acceptable.

The exception to this is in purpose built waste to energy facilities. Such facilities require large quantities of waste to make them economically viable and are not considered a realistic option for an isolated mine site.

Recovery of energy can take other forms such as the recycling of aluminium cans. The production of aluminium metal is an electrolytic process and is extremely energy intensive. Recycling aluminium

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cans results is a huge energy saving over making a new can. The benefit in recycling aluminium cans is therefore a saving in energy as much as a saving in aluminium metal.

5. Disposal to landfill.

Taking all the above principles in consideration, Roy Hill has adopted the hierarchy of implementing reduction, reuse and recycling options as much as practically possible. The onsite landfill will be used to dispose of waste where no practical and viable alternative exists. In order to reduce waste to landfill Roy Hill stipulated that during the construction phase, waste generated by contractors was not to be disposed of in the on-site landfill.

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