



Manly Fast Ferry | The NRMA

Manly Ferry Service Contract

Environmental Plan

Revision 01

Date 15/03/2023

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Document control

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Document numbering convention

Document number (excluding revision)	Document name
MFF-001	Manly Fast Ferry Operator Communications and Marketing Plan
MFF-002	Manly Fast Ferry Operator Stakeholder Engagement Plan
MFF-003	Manly Fast Ferry Accessible Transport Action Plan
MFF-004	Manly Fast Ferry Environmental Plan
MFF-005	Manly Fast Ferry Customer Experience Plan
MFF-006	Manly Fast Ferry Safety Management Plan
MFF-007	Manly Fast Ferry Small and Medium Enterprise and Regional Procurement Plan
MFF-008	Manly Fast Ferry Aboriginal Participation Plan
MFF-009	Manly Fast Ferry Disability Engagement Plan
MFF-010	Manly Fast Ferry Diversity Inclusion Plan
MFF-011	Manly Fast Ferry Business Continuity and Disaster Recovery Plan
MFF-012	Manly Fast Ferry Operator Disruption Management Plan
MFF-013	Manly Fast Ferry Local Content Plan
MFF-014	Manly Fast Ferry Operator Sustainability Plan
MFF-015	Manly Fast Ferry Industrial Relations Plan
MFF-016	Manly Fast Ferry Asset and Services Plan
MFF-017	Manly Fast Ferry Transition In Plan

Revision numbering convention

Documents start at REV00, then are incremented by 1 at each change.

Therefore:

- REV00 – initial version
- REV01 – second version
- REV02 – third version

Purpose and context

Purpose

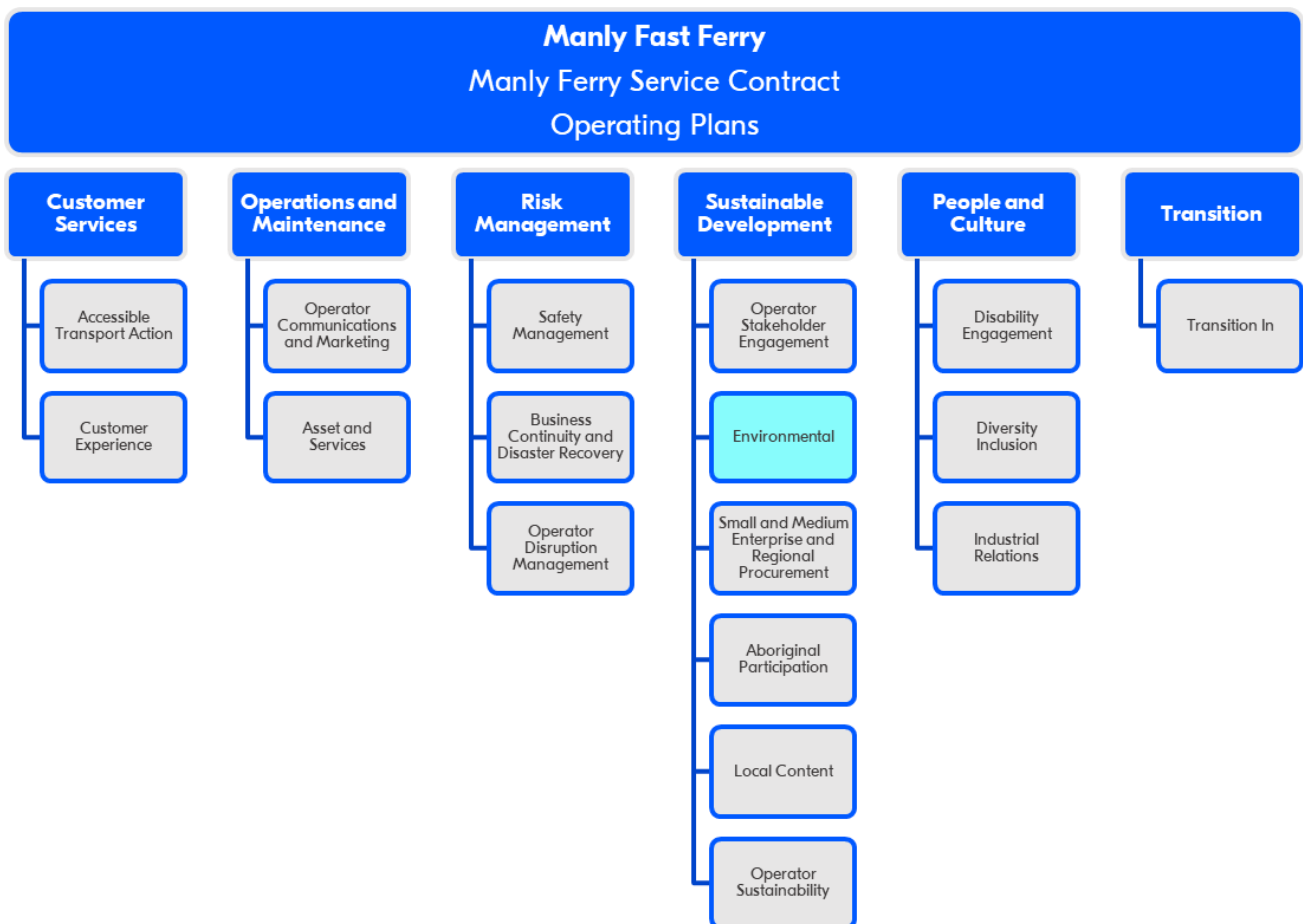
Manly Fast Ferry is committed to operating in an environmentally responsible and sustainable manner. The purpose of this **Environmental Management Plan (EMP)** is to:

- a) Describe the process for the identification and management of environmental hazards and risks;
- b) Describe the reporting framework for environmental incidents;
- c) Describe the framework by to ensure compliance with operational and environmental standards

Context

This EMP applies to on-shore and on water operational activities related to Manly Fast Ferry (MFF). MFF operates vessels within Sydney Harbor.

This EMP forms part of a suite of management plans for the operation of the Manly Ferry Service Contract for Transport for NSW:



The EMP should be read in conjunction with the NRMA Group Safety Management System (SMS). As well as the Marine Safety Manual and the Vessel Operating Manuals (VOM) which are specific to marine operations.

Other key NRMA Group Standards and Procedures listed below which support this EMP should also be consulted on an as needs basis. These internal documents can be supplied to relevant and approved stakeholders as requested.

- NRMA Group - Risk Management Framework
- NRMA Group - Hazard & Risk Management Procedure(PROC2.5)
- NRMA Group - Incident Management Procedure(PROC2.6)
- NRMA Group - Incident Investigation Procedure(PROC2.7)
- NRMA Group - Document & Record Management Procedure(PROC3.5)
- NRMA Group - Training & Competency Procedure(PROC3.6)
- NRMA Group - Emergency Management Standard (STD4.1)
- NRMA Group – HSE Legal Register

Legislative/regulatory/standards compliance

This Plan is subject to the following legislation, regulations, standards and policies:

- Protection of the Sea (Prevention of Pollution from Ships) Act 1983 (Cth)
- Marine Pollution Act 2012 (NSW)
- Marine Pollution Regulation 2014 (NSW)
- Protection of the Environment Operations Act 1997 (NSW)
- Protection of the Environment Operations Act 1997 (NSW)
- Biodiversity Conservation Act 2016 (NSW)
- NSW Fisheries Management Act 1994 (NSW)
- Biodiversity Conservation Regulation 2017 (NSW)
- Environment Protection and Biodiversity Conservation Act 1999
- International Convention for the Prevention of Pollution from Ships (MARPOL)
- AS 1940: 2014 The storage and handling of flammable and combustible liquids

Periodic review

MFF will undertake an annual review of this Environmental Plan and provide each update to TfNSW.

Revisions will take into account any changes to underlying policies and legislation within The NRMA, Manly Fast Ferry and/or NSW Government.

Environmental Policy

At MFF, we are committed to operating in a responsible manner to mitigate or eliminate environmental hazards and risks. The NRMA Group Safety, Wellbeing and Environment Policy Statement outlines management's commitments to environmental management.



Group safety, wellbeing and environment policy statement

Scope

This policy statement is applicable to the business units and associated legal entities of the NRMA Group (the NRMA) operating in Australia and New Zealand and is relevant to all group employees, contractors and other persons.

Our vision

To keep people moving whilst protecting our employees, contractors, Members, customers and passengers from injury, and our environment from harm.

Our commitment

At the NRMA we are absolutely committed to everyone taking responsibility and being accountable for meeting our safety and environment obligations, to provide a safe workplace and protect the environment. The NRMA is committed to the following principles;

- Identifying and managing risks, particularly where they have the ability to cause harm to our people and community or our environment. Our focus will be both on fatal risks (those items which occur rarely but could have a severe outcome) and lower risk items (issues which occur more frequently but with a less severe outcome).
- Creating a culture that empowers people to own their safety behaviours and make good choices both at work and in their home life;
- Engaging with our stakeholders through meaningful communication and consultation which builds trust and delivers innovation and improvement in all aspects of safety;
- Providing proactive and insightful information, training and instruction to ensure we all have the capability to work safely and protect our environment;
- Promoting initiatives to support the environment and our communities to ensure we limit our impact and have positive interactions with both by preventing pollution, minimising energy and water use, reducing waste, protecting waterways and biodiversity, and reducing greenhouse gas emissions; and
- We will meet or exceed regulatory obligations and have a robust and useful management system framework to facilitate and support this.

Our leadership

Compelling leaders who promote and re-enforce our values and behaviours by being exemplary role models. The NRMA will ensure it's adequately resourced and will set annual objectives to realise our vision.

A handwritten signature in blue ink that reads 'Rohan'.

Rohan Lund
Group CEO

Roles & Responsibilities

Role	Responsibility
Chief Operating Officer Marine	<ul style="list-style-type: none"> • Ensuring adequate resources within MFF are available to implement and achieve compliance to this EMP • Advocate at all times, commitment to this EMP and supporting environmental standards, policies and procedures • Ensure that a review and revision of this EMP has been completed every
Operations Manager(s) - Marine	<ul style="list-style-type: none"> • Ensuring adequate resources within MFF are available to implement and achieve compliance to this EMP • Advocate at all times, commitment to this EMP and supporting environmental standards, policies and procedures • Ongoing review in conjunction with operational staff and with assistance provided by the Environmental Business Partner environmental management performance, compliance and reporting • Develop, maintain and communicate this EMP across the Marine operations. • Managing major environmental incidents • Develop and implement control measures to mitigate or minimise environmental risks • Report compliance performance and breaches to CEO/CFO/GM Risk & Audit/HR and in accordance with any relevant procedures
Vessel Masters	<ul style="list-style-type: none"> • Proactively implement and adhere to all environmental management policies, standards and procedures • Report environmental hazards and risks to Operations Manager(s) and/or Environmental Business Partner • Report all incidents without delay via MySafety platform • Ensure all vessel crew are informed and are aware of any environmental hazards / risks and ensure any control measures in place are communicated to vessel crew
Environmental Business Partner	<ul style="list-style-type: none"> • Advocate at all times, commitment to this EMP and supporting environmental standards, policies and procedures • Ongoing review in conjunction with operational staff, environmental management performance, compliance and reporting • Develop, maintain and communicate this EMP across the Marine operations. • Coach, mentor and train marine personal as required to ensure compliance with this EMP and where required, other supporting environmental management documents to support both internal and external regulatory compliance. • Provide SME advice, support and guidance in relation to all environmental incidents with support and assistance from the Vessel Masters, Crew and General Manager, Marine • Develop and implement control measures to mitigate or minimise environmental risks

Role	Responsibility
	<ul style="list-style-type: none"> • Conduct regular site HSE inspections and report results as required
All Personnel	<ul style="list-style-type: none"> • Must comply with this EMP • Report environmental hazards and risks to General Manager Marine and/or Environmental Business Partner • Must escalate all incidents of non-compliance in accordance with the Incident & Breach Management, Reporting and Escalation Procedure • Attend induction and other environmental training as required • Know and follow environmental, incident response and emergency procedures
Contractors	<ul style="list-style-type: none"> • Full compliance with this EMP and other environmental supporting documents relevant to current activities and work descriptions • Identifying environmental risks of their work activities on site • Implement control measures to effectively eradicate or mitigate environmental risks • Attend induction training as required • Know and follow incident response and emergency procedures • Report environmental incidents immediately without delay to their Marine business contract supervisor/owner

Relevant Regulatory Instruments

Obligation	Applicable Requirements
<i>Protection of the Sea (Prevention of Pollution from Ships) Act 1983 (Cth)</i>	<ul style="list-style-type: none"> • Prohibition of discharge of sewage into the sea • Prohibition of discharge of garbage into the sea • Garbage record book must be carried by ships • Garbage record book must be retained in the ship for 1 year • Garbage management plan must be kept on board a ship
<i>Marine Pollution Act 2012 (NSW)</i>	<ul style="list-style-type: none"> • Discharging from a ship into State waters is prohibited for: <ul style="list-style-type: none"> ○ oil ○ noxious liquid ○ garbage ○ harmful substances in packaged form ○ prescribed marine pollutants • The responsible person in relation to a transfer operation must keep records • A shipboard garbage management plan must be in writing and must contain the matters prescribed by the regulations. • Placards relating to requirements for disposal of garbage • A garbage record book to be carried on board ship • “Ship” defined as a vessel of any type capable of being used on or in water and trading ship a ship that is used wholly or principally for the carriage of passengers or cargo for hire or reward
<i>Marine Pollution Regulation 2014 (NSW)</i>	<ul style="list-style-type: none"> • Adoption of Marine Orders for pollution prevention: <ul style="list-style-type: none"> ○ 91 (oil) ○ 93 (noxious liquid substances) ○ 94 (packaged harmful substances) ○ 96 (sewage) ○ 95 (garbage) • No discharge of untreated sewage into any navigable waters • A reportable incident is to be reported by the quickest means available and conveyed through any of the following— AMSA, a Port Corporation, TfNSW
<i>Protection of the Environment Operations Act 1997 (NSW)</i>	<ul style="list-style-type: none"> • Prohibits water, air, land and noise pollution and disposal of scheduled waste. • Establishes environmental offences relating to spills/leaks of chemicals, littering and unlawful disposal of waste • A duty to notify the NSW EPA and other regulators of pollution incidents causing or threatening material harm to the environment.
<i>Protection of the Environment Operations Act 1997 (NSW)</i>	<ul style="list-style-type: none"> • An accountable person must ensure that Safety Data Sheets (SDS) are obtained in relation to hazardous substances • Ensure SDS are readily accessible to any employee who may be exposed to a hazardous substance. • Containers holding chemical substances must be appropriately labelled.

Obligation	Applicable Requirements
	<ul style="list-style-type: none"> A register of hazardous substances must be maintained at the work place.
<i>Biodiversity Conservation Act 2016 (NSW)</i>	<ul style="list-style-type: none"> Offences for harming and picking threatened species, ecological communities and protected plants and animals.
<i>NSW Fisheries Management Act 1994 (NSW)</i>	<ul style="list-style-type: none"> Conservation of fish stocks, key fish habitats, threatened species, ecological communities and marine vegetation. Affects sea grass in Manly Cove through the Fish Habitat Protection Plan (No 2: Seagrasses), as well as works on jetties, wharves, bridges, ramps and pontoons.
<i>Biodiversity Conservation Regulation 2017 (NSW)</i>	<ul style="list-style-type: none"> Defines distances beyond which a vessel or person may not approach a marine mammal.
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	<ul style="list-style-type: none"> Regulates actions that will have, or are likely to have, a significant impact on listed threatened and migratory species. All cetaceans (whales, dolphins and porpoises) are protected in Australian waters. The Australian Whale Sanctuary includes all Commonwealth waters from the 3 nautical mile state waters limit out to the boundary of the Exclusive Economic Zone (i.e. out to 200 nautical miles and further in some places). Within the Sanctuary it is an offence to kill, injure or interfere with a cetacean.
<i>International Convention for the Prevention of Pollution from Ships (MARPOL)</i>	<ul style="list-style-type: none"> International Convention for the Prevention of Pollution from Ships (MARPOL) includes regulations aimed at preventing both accidental pollution and pollution from routine vessel operations. MARPOL is administered by The Commonwealth via the Australian Maritime Safety Authority (AMSA) under the Protection of the Sea (Prevention of Pollution From Ships) Act 1983 and the Navigation Act 2012 (Chapter 4) New South Wales —Marine Pollution Act 2012
<i>AS 1940: 2014 The storage and handling of flammable and combustible liquids</i>	<ul style="list-style-type: none"> Australian standard applicable to storage of bulk flammable and combustible liquids (examples include petrol, diesel, oil and solvents). Contains specific requirements relating to installation of tanks, signage, bunding and spill control equipment.

Risk Assessment

Environmental risks are managed through a systematic approach to prioritise operational control activities.

Group level risks are managed through the NRMA Group Risk Management Framework and recorded in the Group Risk Register.

Marine specific risks at a vessel or site-level are managed through PROC2.5 NRMA Group - Hazard & Risk Management Procedure and are recorded in the Environmental Risk Profile and Risk Register.

This risk register identifies Marine's risks and mitigating strategies in detail. Risks are escalated based on the Group risk appetite. Risk ratings across all levels are determined using the NRMA Group Risk Matrix from the NRMA Group Risk Management Framework.

Operating Requirements

MFF is committed to implementing sound environmental management practices that are fit-for-purpose and effective ensuring either elimination or mitigation of environmental hazards and risks throughout its operations. The NRMA Group SMS includes environmental risk management processes which reference AS/NZS ISO 14001 and include regular assurance to ensure compliance with regulatory requirements and build a culture of continuous improvement. The diagram below shows how we implement our assurance approach.

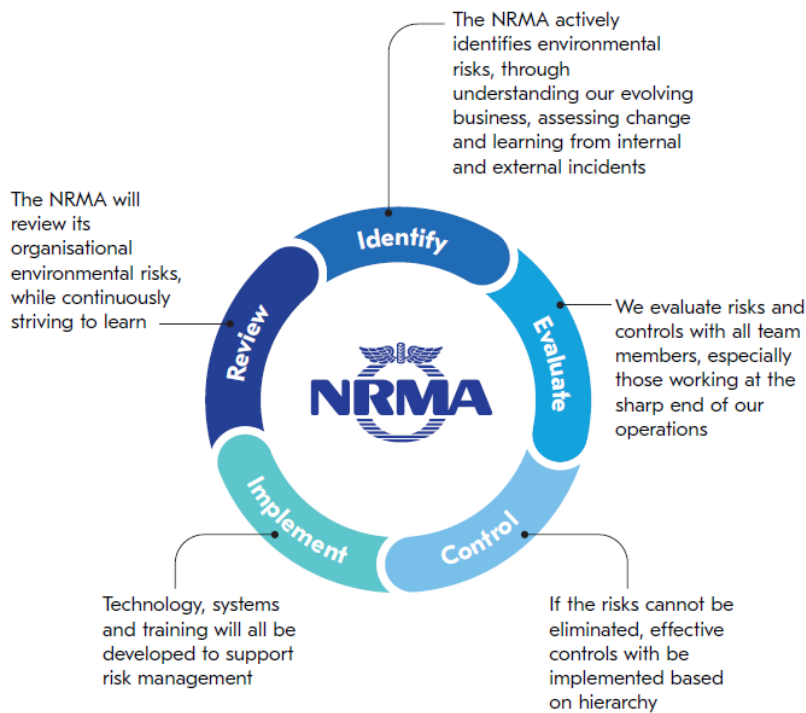


Figure 1 The assurance approach for NRMA Group

MFF ensures our on-shore and on-water activities are carried out under controlled conditions which minimise environmental risks. Supporting Environmental Management procedures relevant to Marine operations and this EMP are provided below.

NRMA Group Procedure	Specific procedures
<i>PROC4.7 - Waste Management</i>	<ul style="list-style-type: none"> 4.1 Waste Classification and Management Plans 4.2 Waste Hierarchy 4.3 Storage, Treatment and Handling of Wastes 4.4 Waste Transport and Tracking 4.5 Recycling and Disposal 4.6 Liquid Trade Waste and Sewage Treatment Systems 4.6 Tips for Sustainable Waste Management
<i>PROC4.8 - Water Management</i>	<ul style="list-style-type: none"> 4.1 Water Minimisation and Use 4.2 Servicing Machinery and Vehicles 4.3 Washing Vehicles and Vessels

NRMA Group Procedure	Specific procedures
	<ul style="list-style-type: none"> • 4.6 Tips for Sustainable Water Management
<i>PROC4.10 - Land, Biodiversity & Heritage Management Procedure</i>	<ul style="list-style-type: none"> • 4.5 Protection of Flora, Fauna and Biodiversity
<i>PROC4.13 – Chemical & Dangerous Goods</i>	<ul style="list-style-type: none"> • 4.1 Identification of Chemicals & Dangerous Goods • 4.2 Training, Communication and Consultation • 4.3 Globally Harmonised System (GHS) • 4.4 Personal Protective Equipment (PPE) • 4.5 Ordering/Purchasing • 4.6 Storage • 4.7 Manifests • 4.9 Decanted substances and Labelling • 4.10 Bulk Fuel Management • 4.11 Contractors • 4.12 First Aid and Emergency Response • 4.13 Spill Containment • 4.14 Disposal • 4.15 Health and Exposure Monitoring

Training and Awareness

The following environmental related training is provided to workers as per PROC3.6 NRMA Group - Training and Competency Procedure. Training records for NRMA courses are available through NRMA Group Safety and Wellbeing and provided to MFF.

Training Course	Audience
NRMA Group HSE Introduction (online)	<ul style="list-style-type: none">All employees to complete within 30 days of starting with NRMA
MFF Induction	<ul style="list-style-type: none">All employees should complete after starting with MFF
MFF Contractor Induction	<ul style="list-style-type: none">All contractors to complete before starting work unsupervised on site
Toolbox Talks	<ul style="list-style-type: none">Staff as required
NRMA Group HSE Introduction (online) – course for managers on water, waste, environmental management, etc.	<ul style="list-style-type: none">MFF Managers and Supervisors

Incident Management

Incident and Emergency Response

In the event of an incident or emergency (e.g. an oil, fuel or chemical spill or a fire) personnel shall initiate the emergency procedures:

- PROC2.6 NRMA Group - Incident Management Procedure
- PROC2.7 NRMA Group - Incident Investigation Procedure

Refer to the NRMA Group SMS procedure PROC4.13 NRMA Group – Chemical & Dangerous Goods Procedure (section 4.13) for procedures on cleaning up oil, fuel and chemical spills.

- For Police, Ambulance, Fire Brigade call 000
- Spill kits are available at on-shore operational sites where oils, fuels and/or chemicals are kept, and are stored in an easily accessible location.
- Spill kits are checked regularly to ensure they contain all required contents and restocked after use.
- Fire extinguishers will be serviced (6 monthly inspection completed). Instructions for use are included in emergency response flipcharts installed at on-shore operation sites.
- Safety Data Sheets (SDS) shall be:
 - available for all hazardous substances and dangerous goods on site;
 - accessible to all staff in hardcopy; and
 - less than five (5) years old (or current available version from supplier).

Environmental Incident Reporting

It is the responsibility of all employees, visitors and contractors to ensure all workplace incidents are reported as soon as possible after they occur. All incidents should be reported via the NRMA Group Incident Reporting Hotline by phoning 1300 771 914.

Environmental Audits & Inspections

Site Inspections

Regular vessel and site inspections (such as Vessel Inspection - Passenger Areas, MOSA) are conducted using MySafety. The inspection checklist assesses both operational elements of the EMP to ensure MFF personnel are complying with relevant procedures and maintaining a high standard of environmental performance.

Internal Audits

Internal audits are conducted at a Group level according to the NRMA Internal Audit Charter.

Document and Record Control

Documents

The process for document control is explained in PROC3.5 NRMA Group - Document & Record Management Procedure.

This ESP and related documentation is controlled to ensure personnel have access to up-to-date information. Relevant documentation will be controlled in hardcopy form in a site folder in the site office and electronically on the MFF server. Documents and records relevant to this EMP include:

- Training materials
- Safety Data Sheets (SDS)
- Bulk fuel transfer and storage monitoring records
- Waste (garbage) disposal and recycling records
- Audit/inspection records
- Incident records

Records

Records are maintained for a minimum of seven (7) years as per PROC3.5 NRMA Group - Document & Record Management Procedure or as required by regulatory requirements.

Appendix I

Abbreviations & Definitions

AMSA	Australian Maritime Safety Authority
ATSB	Australian Transport Safety Bureau
ESD	Ecological Sustainable Development
EPA	Environment Protection Authority (NSW)
ESP	Environment & Sustainability Plan
HSE	Health, Safety and Environment
MARPOL	International Convention for the Prevention of Pollution from Ships
MEPS	Minimum Energy Performance Standards
OTSI	Office of Transport Safety Investigations [NSW]
SDG	Sustainable Development Goal
SDS	Safety Data Sheet
SMS	Safety Management System
SOP	Standard Operating Procedure
WHS	Work Health & Safety