



CASE STUDY

Sucrogen SHE

Management

**Sucrogen's approach to environmental
management & compliance**

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Sustainability)**



Outline



- Provide an overview of Sucrogen
- Outline Sucrogen's SHE Strategy and SHE Framework
- Regulatory compliance within the SHE Framework
- Environmental Reporting
- Integrating Environmental Compliance
- Conclusions – progress update and lessons learnt

1. Sucrogen – more than sugar

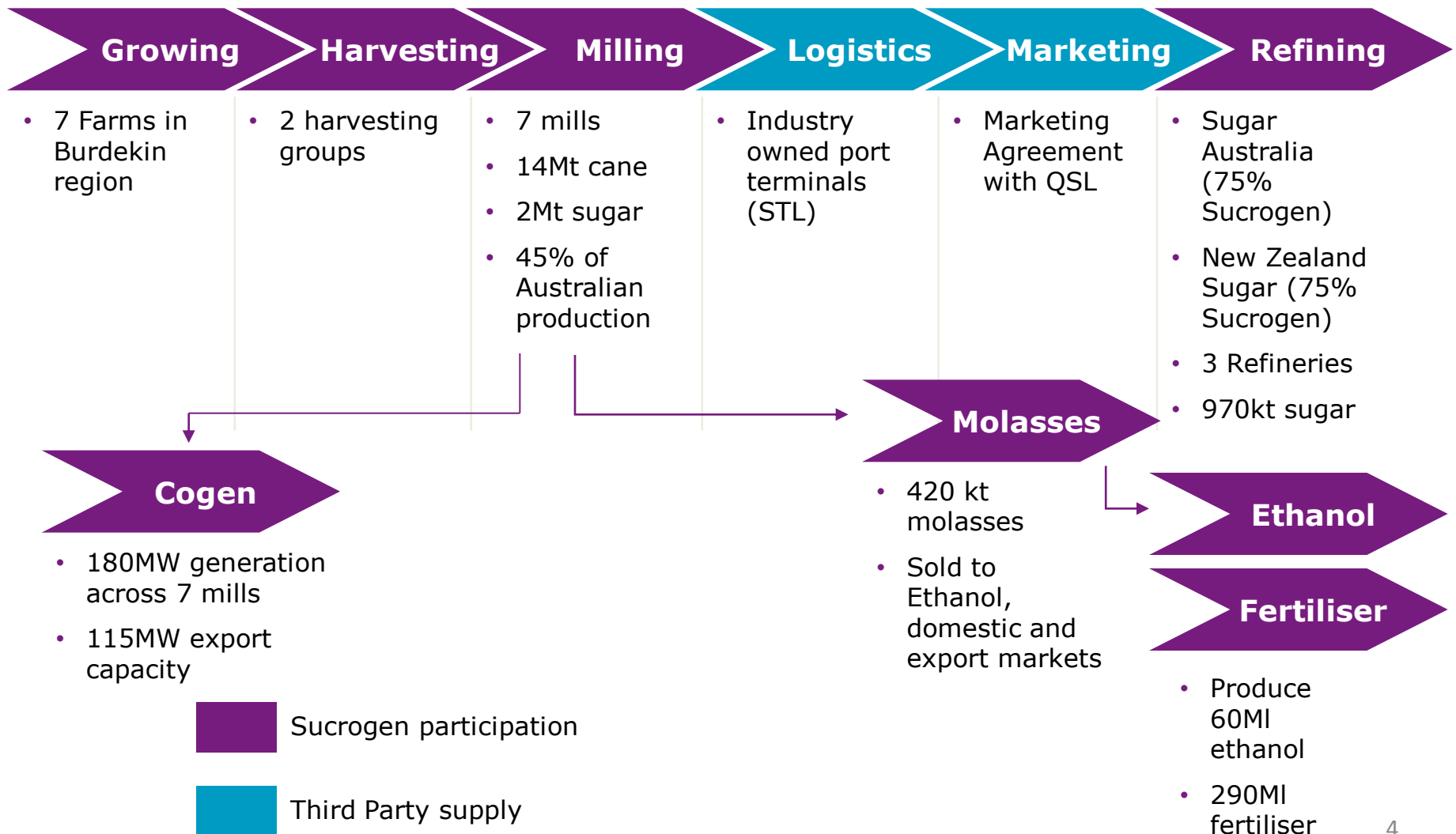
We think so!



1. Sucrogen – more than sugar

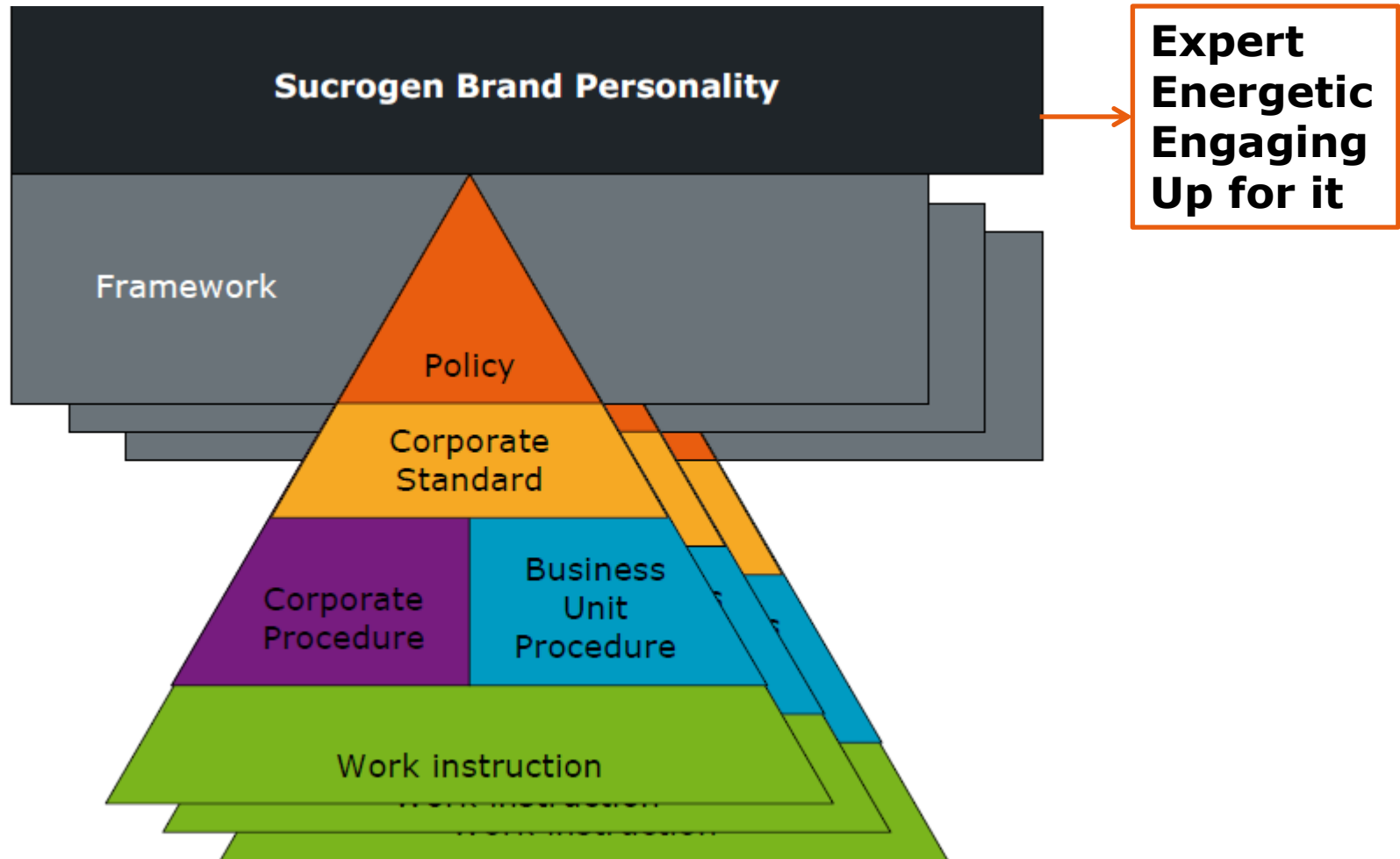


Sucrogen participates across the value chain



3. SHE Management in Sucrogen

3.1 Document Hierarchy



3. SHE Management in Sucrogen



3.2 SHE Policy

**Sucrogen
Safety Health & Environment
Policy**
SHE-SUC-NSY-10-01-001



In Sucrogen, we care for and protect each other, our business and our environment; with the aim to build a sustainable, profitable and growing international enterprise. We want our employees to return home to their family and friends as healthy as when they started the day.

Consistent with this, Sucrogen will:

- Identify and control hazards, risks and impacts, and adopt an approach that will eliminate or at least minimise risk;
- Ensure that employees, contractors and visitors are informed of the hazards and conditions that may impact on the safety and health of themselves and others, our business and our environment;
- Develop capable employees, and recognise and celebrate achievements;
- Drive a culture of learning and sustainable improvement;
- Through consultation, implement safe systems that support responsible care and continuous improvement;
- Involve and engage employees and contractors in the improvement of the safety and health of themselves, our co-workers, our business and our environment;
- Actively communicate with concerned stakeholders including employees, government and the community on safety, health and environmental issues; and
- Comply with the laws, regulations and policies applicable to our operations to achieve zero harm.

29th June 2010


Ian D. Glasson
CEO, Sucrogen



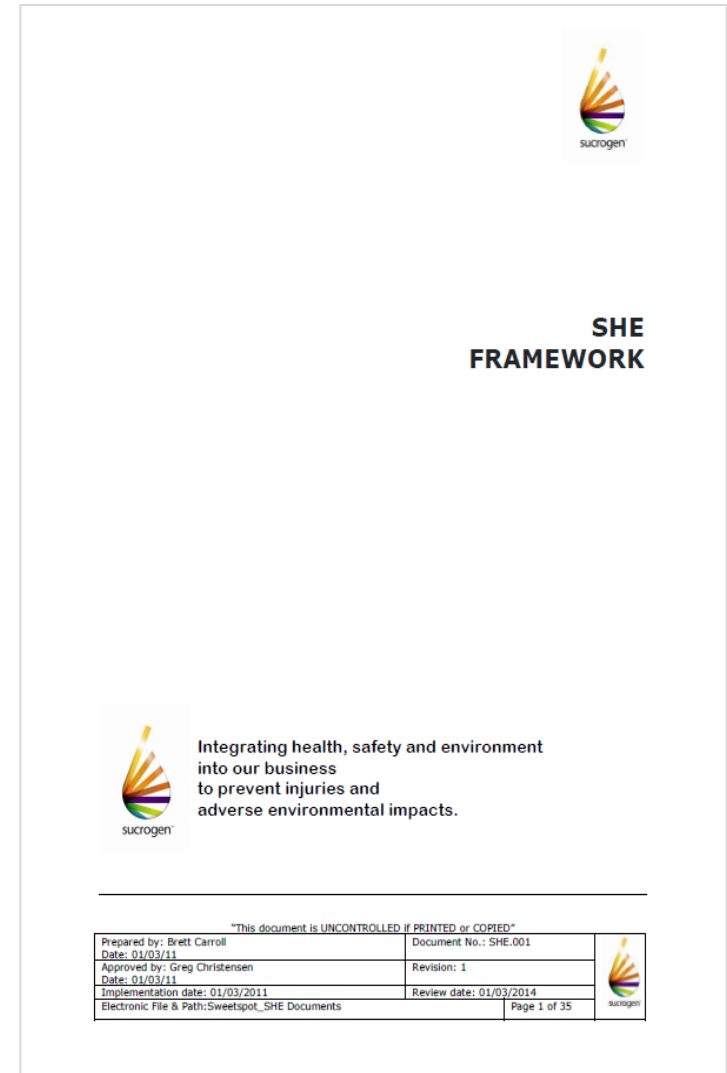
- Moving to a single SHE Policy for the entire company.
- Policy describes the Company's **intent** around SHE which is to be implemented through the Framework.
- Policy is currently under review as part of **annual process**
 - Ensuring continued relevance and alignment to our goals
 - Consultation across entire organisation

3. SHE Management in Sucrogen



3.3 Sucrogen SHE Framework

- Issued in March 2011, the Sucrogen SHE Framework provides the **structure** for the management of Safety, Health and Environment across Sucrogen.
- The Framework is aligned with the requirements of **national and international best practices** in safety and environmental management, specifically AS/NZS14001 for environment.
- The SHE Framework then expresses these best practices and requirements in our Sucrogen **business terminology** and in alignment with our Sucrogen **business processes**.



3. SHE Management in Sucrogen

3.3 16 Elements of the Sucrogen SHE Framework



#	SHE Framework Elements
1	Leadership, Commitment & Planning
2	Communication, Consultation & Involvement
3	Regulatory Compliance
4	Information & Documentation
5	Hazard Identification & Risk Management
6	Training & Competency
7	Incident Management & Investigation
8	Injury Management
9	Employee Personal Safety, Health & Wellbeing
10	Workplace Operational Risk Management
11	Change Management
12	Third Party Services
13	Product Stewardship
14	Emergency Preparedness & Response
15	Corrective Action Assessment & Analysis
16	Management System Audit

3. SHE Management in Sucrogen



3.4 Sucrogen SHE Framework Structure

- The Sucrogen SHE Framework comprises:
 - **Elements** - broad labels for SHE management aligned with our business practices.
 - **Purpose Statements** - providing a basic understanding of the content of each Element.
 - **Design Criteria** - providing a definition of the intent and key requirements of each element which facilitates the customisation of tools to meet business needs.

4. Regulatory Compliance



4.1 Element 3: Regulatory Compliance

Purpose: There is an established and communicated system for the identification, management and application of relevant legislation, licences, codes of practices and standards.

#	Design Criteria
3.1	Procedures and plans will be established, documented and implemented to ensure effective compliance across the business to applicable legislation, standards and licences, as well as Sucrogen Corporate, Business Unit and site requirements (“other requirements”) as appropriate.
3.2	Processes will be developed and implemented for the management of non-compliances with the applicable legislation, standards and licence requirements.
3.3	Procedures are in place to identify, monitor and provide sites and functions with timely notice and understanding of new and revised laws and regulations, including guidelines for consistent interpretation with legal consultation as appropriate.
3.4	Compliance plans are developed and implemented for new and revised laws, regulations, and licence conditions.
3.5	Information on applicable laws, regulations, and licence conditions are kept current, and the resulting operating requirements are documented and communicated to those affected.
3.6	An internal program will be established and conducted to identify high risk areas and ensure regulatory compliance.

4. Regulatory Compliance



4.2 Regulatory Compliance Working Group

- Sucrogen and business units have access to a range of legal compliance sources, however, there was no coordinated approach.
- Regulatory compliance working group was established Q2 2011.
- Expected Outcomes/Deliverables:
 1. Completed Regulatory Compliance Standard outlining minimum requirements for regulatory compliance across Sucrogen
 2. Completed Corporate Procedure outlining how Corporate SHE team will provide consistent regulatory compliance information to business units
 3. Supporting tools and training packages

4. Regulatory Compliance

4.3 Regulatory Compliance Standard



- Overarching **Standard** for the management of regulatory compliance
- Applies to all Sucrogen Business Units and Sites
- Standard includes:
 - Notification Resources
 - Responsibilities
 - Compliance Plan
 - Licenses & Permits
 - Certificate of Competency
 - Evaluation of compliance & non conformance



4. Regulatory Compliance - New Approaches



4.4 Compliance Monitoring

- Sucrogen is in the process of implementing a compliance monitoring program.
- Compliance monitoring is undertaken by the Corporate SHE team using a range of sources:
 - EnviroLaw & SafetyLaw
 - Standards Australia
 - SAI Global
 - Industry Association Newsletters (e.g. Ai Group, AEBN)
 - National & State regulatory bodies
- Changes to or new legislation and regulatory requirements are tracked through a **SHE Compliance Register**.

4. Regulatory Compliance - New Approaches



4.4 Compliance Monitoring

- Sites have access to EnviroLaw, which provides instant, up to date, plain English summaries of environmental legal obligations for each Australian state and New Zealand.
- Information is stored by State and includes Site Licenses, Permits and Agreements.
- Encouraging relevant users to subscribe to monthly updates



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New Zealand
Queensland
South Australia
Tasmania
Victoria
Western Australia



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4. Regulatory Compliance - New Approaches



4.5 Compliance Notification

- Changes to compliance obligations are “trickled down” through the business, from Corporate SHE → Business Units → Sites
- Notification undertaken **via email** to nominated personnel
 - Description of changes
 - Action required
 - Communication Required
 - Implementation date
- Notification also requires **positive feedback**

Date Alert Issued: **XX/XX/XX**



SHE Compliance Alert

This is a Sucrogen SHE Compliance Alert and is provided to update Business Units and/or Sites of changes to applicable Occupational Health & safety or Environmental legislation, regulations or other compliance requirements.

The recipient of this Alert is required to complete and return the form in Appendix 1 and return to Corporate SHE.

Compliance Change:	(e.g. Act, Regulation etc)	Implementation Date: 12/09/10
Description:		
Required Changes:		
Required Communication:		

5. Environmental Reporting



- The primary driver for the group was external environmental compliance reporting (e.g. NGER Act) and immediate need for review of environmental reporting systems
- Working Group addresses multiple SHE Framework Elements, with a specific focus on environmental reporting & compliance:
 - Element 1: Leadership, commitment & planning
 - Element 3: Regulatory compliance
- **Environmental Reporting Standard** was approved 1 July 2011 and has been implemented across environmental networks in business.
- Supporting the Environmental Reporting Standard are two **Corporate Procedures**
 - *Environmental Reporting Annual Facility Review Procedure*
 - *Environmental Reporting Contractor Assessment Procedure*

5. Environmental Reporting



- Core component of standard is that reporting responsibilities are maintained at site
 - Site engagement with environmental compliance
 - Linking environmental reporting with environmental compliance
 - Building & enhancing environmental network
- Review of reporting tools and IS/IT requirements is currently underway to focus on how systems can be enhanced to reduce reporting burden
- Review and revision of existing Environmental Reporting Standard
 - Based on feedback from the 2011 NGER reporting period
 - Expansion to integrate incident reporting requirements
 - Implications for carbon pricing reporting requirements

6. Integrating Environmental Compliance



- Environmental compliance spans other elements of the SHE Framework including:
 - Element 7: Incident Management & Investigation
 - Element 10: Workplace Operational Risk Management
 - Element 16: Management System Audit
- **Example:** Incident reporting is done using an online system which includes escalation & notification – specific environmental category



Incident Report Form

Report INC-11-1290 - Printed 16/11/2011 10:37 AM

Incident Type

Entered By:	
Employee No:	<input type="text"/>
Date Entered:	<input type="text" value="16/11/2011"/>
First Name(s):	<input type="text"/>
Surname:	<input type="text"/>

7. Conclusion

7.1 Implementation Program



- SHE Policy & SHE Framework currently in place
- 1st priority key standards and procedures in place by end-2011:
 - SHE Leadership and Planning
 - Incident Management
 - Injury Management
 - Hazard Identification and Risk Management
 - SHE Management System Auditing
 - SHE Regulatory compliance
- 2nd priority standards and procedures in place by March 2012
- Corporate, Business and Site Management Systems aligned with Framework by December 2012.

7. Conclusion

7.2 Lessons Learnt



- Need to have clarity around business case and rationale for moving to a common system and ensure this is understood across the organisation.
- Building an **environmental network** is crucial
 - Responsibility for environmental is often not primary role (e.g. production or SHE staff)
 - Communication – not only for information but as a learning tool
- Consultation and buy-in from all affected parts of the business is critical to ensuring the approach `stick's - our cross-business working groups / SHE Network (**recognise this takes time!**).
- Regulatory compliance is only one piece of the SHE Management puzzle.
- Sucrogen's SHE Framework is only effective where it is underpinned by **commitment** across all levels of the organisation.