SECTION 8: COMMUNICATION OF ENVIRONMENTAL ISSUES

8.1 OBJECTIVE
The objectives of communication are to:

- raise awareness of the environmental policy;
- demonstrate management commitment to environmental issues;
- liaise with external Authorities regarding environmental performance;
- manage concerns about environmental issues of the company’s activities, products or services; and
- Inform internal and external interested parties about the company’s environmental performance.

This section provides the framework for internal communication within the various levels and functions of the organisation, and receiving, documenting and responding to communications from external parties.

8.2 REFERENCES
Incident and Investigation Procedure HR-2-010

8.3 ACTION ITEMS

8.3.1 Communication techniques
Internal communication techniques to divulge information between the various levels of the business include:

- E-mails;
- Meetings;
- Notice-boards; and
- Memos.

External communication techniques to divulge information to interested parties and regulatory authorities can include:

- submissions to regulatory bodies;
- media releases; and
- Site visits and tours.

8.3.2 Internal Communication
Internal communication includes:

- promoting environmental policy and programs
- exchanging information regarding environmental performance
- understanding site environmental issues

8.3.3 External Communication
External communication will include:

- Dealing with regulatory authorities;
- How to handle any public concerns; and
- Responding to enquiries from interested parties.
This document outlines the procedure associated with the management of inspections and queries by regulatory officers and the general public. Such people could be from:
- Queensland Environment and Heritage Protection Authority;
- Lockyer Valley Regional Council;
- General Community;
- Media (radio, newspaper, television); and
- Business contacts, including clients.

8.3.4 Authority Visits

Visits may be pre-arranged or unannounced. This procedure separates these two scenarios.

Inspections to the site may be for routine compliance requirements, to discuss program improvements or to advice of a complaint, to advise and commend improvements or to advice of changes to regulations or local policy / guidelines.

Alternatively, site visits could be with the view of gathering evidence for prosecution purposes or incident investigation.

Initial Dealings:

Announced – General
Announced visits are defined as a general site visit whereby notification is received by the site Manager, Property Owner, or their representative (Safety and Environment Representative) as to the purpose of the meeting, its likely outcome and resources required for their visit.

During such visits, the host will be responsible for the officer and use best discretion as to any request for site tours, or information requests.

Announced – Possible Regulatory Investigation
The procedure to follow in such an instance follows that of “unannounced visits”, described below.

Unannounced
An unannounced visit is defined as a regulatory officer unexpectedly arriving at the site and requesting to access the site, view site practices, or interview personnel as part of an investigation.

During an unannounced visit, the following procedure is to be followed:
1. Politely request proof of identity.
2. When verified, request the officer to remain in your presence until an appropriate employee is available to supervise their visit. The officer should not be permitted to access the site unaccompanied due to safety considerations.
3. If questions are asked of a person other than the nominated site representative, respond only with facts.
4. Determine the purpose for their visit.
5. Immediately contact the Site Manager or the Safety & Environmental Representative, or their representative and relay name of officer and purpose of visit.
6. The Site Manager, or their representative (Safety & Environment Rep) is to meet the officer at the site entrance accompany the officer at all times during their site visit, noting any questions asked that are likely to be used for regulatory action.

7. The officer is to be assisted in their enquiries as they have the legal right to inspect. Information relayed to the officers is to be honest and kept factual. Information not relevant to enquiries should not be volunteered.

8. Detailed requests for documentation made by the officers should be requested in writing to ensure relevant material is supplied. The Site Manager or their representative is to use discretion as to whether requests made are sufficiently detailed. (Legal interpretation may be needed).

9. The Site Manager or Safety & Environmental Rep is to be present during any on-site interviews with personnel. Personnel interviewed are to respond to enquiries with factual information only. Speculative advice or information not relevant to the direct question should not be provided. Information requested outside interviewee’s personal and direct knowledge is to be referred to the Site Manager.

10. Any samples removed by the officer are to be noted and a decision made by the Safety and Environmental Rep as to whether a duplicate sample will be taken.

11. Following departure from the site, an Incident Report is to be detailed, noting information collected by officer and personnel interviewed during their time on site.

12. A follow up call should be made to the inspector to obtain an understanding of their likely future course of action and whether Helidon Resources can be of further assistance to their enquiries.

8.3.5 Community Liaison and Complaints

The Safety and Environmental Representative is to assist with the provision of relevant information to respond to the enquiry/complaint delivered to Helidon Resources.

Any environmental complaints made to the company from external personnel are to be documented and investigated in accordance to Incident and Investigation Procedure HR-2-010.

8.3.6 Media (radio, newspaper, television)

Enquiries from the Media are to be directed to the Owners/Manager of Helidon Resources for response. Unless authorised by the Owner/Manager, no employee is to make a media statement on behalf of Helidon Resources.

8.4 RESPONSIBILITIES

The Site Manager is responsible for maintaining a complaints register and responding to complainants.

The Site Manager is responsible for responding to Regulatory Authorities and Media and can authorise the Safety and Environmental Rep to speak on their behalf.

8.5 DOCUMENTATION

Incident/Complaints Register HR-2-011