

6. Commitments

Table 13 provides a list of the specific commitments identified that are required:

- ▶ to achieve ecologically sustainable development;
- ▶ to avoid, remedy or mitigate undesirable environmental, social, economic or community impacts; and
- ▶ to enhance the benefits which could flow from the project to Tasmania.

Table 13: Listing of Commitments

Element	Volume	Section	Commitment	Why	Responsibility	Relevant Standard	Associated Agency
Technology	1	6	Gunns will comply with the Recommended Environmental Emission Limit Guidelines for any New Bleached Kraft Pulp Mill in Tasmania – Volume 2 subject to clarifying the emission limits for NOx and SOx.	Cost effective and demonstrates best Environmental and Technological Practices resulting in highest available production.	Gunns	Recommended <i>Environmental Emission Limit Guidelines for any New Bleached Hardwood Kraft Pulp Mill in Tasmania – Volume 2</i>	RPDC, DTAE
Technology	1	5	The Bell Bay pulp mill will have amongst the lowest emissions in terms of air quality and odour of any in the world	Demonstrates best Environmental and Technological Practices. Has minimal environmental impact on surrounds.	Gunns	Recommended <i>Environmental Emission Limit Guidelines for any New Bleached Hardwood Kraft Pulp Mill in Tasmania – Volume 2</i>	RPDC, DTAE
Technology	1	5	The mill will use best practice bleaching technology to whiten cellulose fibre for the production of premium pulp	Best Environmentally friendly practice	Gunns		RPDC
Technology	1	5	The bleaching technology will be elemental chlorine free (ECF) which uses chlorine dioxide.	This technology uses chlorine in a form that does not produce any known toxic by products	Gunns		

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Technology	1	6.1	The pulp mill will be designed to comply with the Emission Limit Guidelines subject to clarifying the limits for NOx, SOx and the status of the IDP.	To comply with Emission Guidelines	Gunns	Recommended <i>Environmental Emission Limit Guidelines for any New Bleached Hardwood Kraft Pulp Mill in Tasmania – Volume 2</i>	
Technology	1	6	Gunns will employ Best Available Technology in the design of the pulp mill	For a technologically advanced and cost effective set-up.	Gunns		
Technology	1	1.2.10	Gunns has committed to adopting new BAT if it is economic to do so, and the plant proposed as part of this project will be capable of adaptation in the future.	To allow for new technologies to be implemented in the future with minimal expansion and cost required.	Gunns		
Pulpwood Supply	1	1.2.9	The pulp mill will not result in any changes to forest access or intensification of forestry operations.	Gunns would be using presently available woodchips that would otherwise be exported.	Gunns		
Pulpwood Supply	1	1.2.9	No old growth pulpwood, as defined by the Tasmania Regional Forest Agreement (RFA), will be used in the mill.	Compliance with Regional Forestry Agreement (RFA)	Gunns	Tasmania Regional Forest Agreement (RFA),	

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Pulpwood Supply	1	1.2.9	The wood supply for the pulp mill will be secured from forest managed in accordance with the RFA (for so long as that Agreement or any reviewed, extended or replacement Agreement or other instrument remains in force) and the Forestry Practices Act 1985 (or any amending or replacement Act that regulates the forest industry in Tasmania).	To comply with all relevant Forestry Acts, Codes and Agreements.	Gunns	<i>Forestry Practices Act 1985</i> Tasmania Regional Forest Agreement (RFA),	
Pulpwood Supply	1	6.2.4	Timber feedstock for the pulp mill will be sourced from native forests and plantations on private and public land and will comply with the Forest Practices Act 1985, the Forest Practices Code, and any other laws or regulations that from time to time apply to the establishment, maintenance and harvesting of timber in Tasmania.	To comply with all relevant Forestry Acts, Codes and Agreements.	Gunns	<i>Forest Practices Code, 2000.</i> <i>Forestry Practices Act 1985</i> Tasmania Regional Forest Agreement (RFA),	
Pulpwood Supply			The supply of timber as feedstock to the pulp mill will therefore not affect or prevent the implementation of this RFA objective.				
Pulpwood Supply	1	6	No additional intensification outside of the current Gunns Owned or Managed planting levels	Gunns will source its timber from a wide variety of sources, and additional intensification is not required.	Gunns		
Pulpwood Supply	1	6	The level of timber production from native forests is not expected to intensify, nor are the areas of native forest available for timber production expected to increase, because of the pulp mill	Gunns will source its timber from a wide variety of sources, and additional intensification is not required.	Gunns		

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Waste	1	1.2.4	The landfill will receive waste from the pulp mill only, and will not accept waste from the public, other industry or municipalities.	Landfill is required on site as George Town Landfill cannot cope with expected quantity of waste and is facing closure. On site landfill is designed only to receive waste from mill.	Gunns		
Waste	1	1.2.4	Gunns will continue to research and review opportunities for beneficial reuse of process waste, (as fertiliser and/or soil conditioner on plantations or as a raw material for cement production),	To minimise waste disposal associated with mill and to create an economically viable use of the waste product.	Gunns		
Waste	1	1.2.4	Gunns will maximise reuse to the extent that economic and environmental benefits and costs allow.	To minimise waste disposal associated with mill and to create an environmentally and economically viable alternative via reuse.	Gunns		

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Waste	1	1.2.4	No hazardous waste will be disposed of to the pulp mill landfill. All hazardous waste will be transported to an established landfill approved for that purpose.	Purpose of landfill on pulp mill site is to house non hazardous material, therefore hazardous material will be transported to another site with capacity to hold hazardous waste.	Gunns	Environmental Management and Pollution Control (Waste Management) Regulations, 2000 DPIW Environment Division Bulletin No 105, Classification and Management of Contaminated Soil for Disposal, February 2004	
Waste	1	1.2.6	The concept design for the landfill is for 20 years and the need for additional landfill life will depend on the amount of waste that can be beneficially reused. This will be monitored during operations, and any necessary extension beyond 20 years will be designed if and as necessary, well in advance of it being required.	While the concept design of the landfill is based on a 20-year life, there is sufficient additional capacity at the site for another 30 years of landfill space (giving a total available capacity of 50 years) even if reuse is not undertaken.	Gunns		
Waste	2	4.14.1	Gunns will maximise the recycling of construction waste	To minimise waste disposal in the pulp mill landfill.	Gunns	EMP (Design and Construction)	

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Waste	2	13.6.4	Geosynthetic clay liner and an HDPE membrane liner will be used on the landfill for leachate control	Minimise contamination to groundwater	Gunns	EMP (Design), Appendix 55, Groundwater Quality Standards. EMP (Design), Section 3.3.2, Surface Water MMP. State Policy on Water Quality Management, 1997	DPIW
Waste	2	13.6.3	Leachate from the landfill will be collected and treated in the pulp mill effluent treatment plant.	Minimise site contamination	Gunns		
Infrastructure			Gunns will replace pumps and electrical and control equipment of the water supply pipeline as required to meet the pulp mill operational life of 30 years.				
Infrastructure	2	4.3.3	Gunns will maintain ongoing liaison and negotiations with land owners, utility/service providers and infrastructure agencies regarding relocation of services, new infrastructure and any approvals required, prior to commencement of construction works	Minimise the potential impacts of development	Gunns	MMPs, EMPs Section 3 Vol 4	DPIW
Infrastructure	2	4.3.3	Relocation of services and construction of new services will be completed in consultation with the service provider and land holder.	Minimise the potential impacts of development	Gunns	MMPs, EMPs Section 3 Vol 4	DPIW
Infrastructure	2	4.3.3	Gunns will advise service providers and users of the time and duration of disruptions to services	Minimise the potential impacts of development	Gunns	MMPs, EMPs Section 3 Vol 4	DPIW

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Air Quality	2	4.5.8	Gunns will use of BAT in emission control	To minimise Operation Phase Air Emissions	Gunns	Recommended <i>Environmental Emission Limit Guidelines for any New Bleached Hardwood Kraft Pulp Mill in Tasmania – Volume 2</i> NEPM for Air Quality and the Tasmanian air quality objectives in schedules 1 and 2 of the <i>Environment Protection Policy (Air Quality) 2004</i> .	DPIW

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Air Quality	2	4.5.8	Gunns will collect and incinerate concentrated and diluted malodorous gases and control the resulting SO2 emissions.	To minimise the Operation Phase Odour Emissions	Gunns	Recommended <i>Environmental Emission Limit Guidelines for any New Bleached Hardwood Kraft Pulp Mill in Tasmania – Volume 2</i> NEPM for Air Quality and the Tasmanian air quality objectives in schedules 1 and 2 of the <i>Environment Protection Policy (Air Quality) 2004</i> .	DPIW

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Air Quality	2	4.5.8	Gunns will maintain a permanent air quality monitoring station at Rowella	To monitor air emissions in the area	Gunns	Recommended <i>Environmental Emission Limit Guidelines for any New Bleached Hardwood Kraft Pulp Mill in Tasmania – Volume 2</i> NEPM for Air Quality and the Tasmanian air quality objectives in schedules 1 and 2 of the <i>Environment Protection Policy (Air Quality) 2004</i>	DPIW
Community Consultation	1	5	Gunns will continue its consultation program, ensuring any person wishing to acquire further information about the Bell Bay Pulp Mill proposal can do so.	To ensure accurate and consistent information is being disseminated to the community	Gunns		
Community Consultation	1	5	Gunns will continue consultation with the Aboriginal community.	To ensure accurate and consistent information is being disseminated and to minimise impacts on Indigenous values	Gunns		

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Community Consultation	1	5	Gunns will prepare a detailed consultation strategy for the launch of the Draft IIS	To ensure that the science contained in the IIS is understood by all sections of the community.	Gunns		
Community Consultation	1	5	Community feedback will be documented and considered by Gunns as part of the future planning for the construction and operation of the Pulp Mill.	Key issues or concerns made by community members are responded to by Gunns and appropriate changes where applicable are made to mill design.	Gunns		
Community Consultation	1	5	Gunns will produce new fact sheets and project summaries which will be made available in hard copies and on the website.	To provide the community with up to date and important facts relating to the pulp mill	Gunns		
Community Consultation	1	5	All individuals and groups that received the initial project overview presentation from Gunns will be contacted again regarding any interest in the detail contained in the Draft Integrated Impact Statement	This will ensure that key community groups are given an opportunity to have the content of the IIS presented in simple terms.	Gunns		

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Greenhouse	1	6.4	The mill will be greenhouse gas positive and produce green power eligible for renewable energy certificates	Extra electricity the mill produces with bio-fuels replaces fossil fuel generated electricity	Gunns		
Greenhouse	1	6.1.2	The pulp mill will utilise forest biofuel to generate net sellable electricity	Cost effective way of utilising forest biofuel.	Gunns		
Greenhouse	2	4-	Gunns will be implementing a range of measures to reduce greenhouse gas emissions, and therefore comply with the National Greenhouse Strategy and the Tasmanian Greenhouse Statement	Minimise air emissions	Gunns	NEPM- for Air Quality and the Tasmanian air quality objectives in schedules 1 and 2 of the <i>Environment Protection Policy (Air Quality) 2004</i> Recommended <i>Environmental Emission Limit Guidelines for any New Bleached Hardwood Kraft Pulp Mill in Tasmania – Volume 2</i>	
Greenhouse	2	4.21.4	Gunns will not use ozone depleting substances in pulp manufacture	To comply with relevant ozone protection provisions	Gunns	EMPCA 1994	

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Water Quality	2	4.7.4 (Table 71)	First flush and contaminated stormwater will be treated in the effluent treatment plant. Stormwater release to the Tamar River only during storm events greater than 1 in 10 year	To minimise impacts on surface and groundwater systems	Gunns	Surface Water Quality Standards. State Policy on Water Quality Management, 1997. EMP (Design), Section 3.1.1, Groundwater MMP	DPIW
Water Quality	1	5	No effluent will be released into the Tamar River	The effluent will be released into Bass Strait.	Gunns	<i>Environmental Management and Pollution Control (Waste Management) Regulations, 2000</i>	
Water Quality	2	4.8.5	Blasting is not required for construction of the wharf	Pile driving used instead. Will not disturb significant quantities of sediment.	Gunns		
Water Quality	3	5.7.4	Environmental flows into Cataract Gorge will not be reduced	Water extraction will occur via Trevallyn dam as to minimise impact on natural flows through Cataract Gorge	Gunns	Construction EMP	

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Visual	1	5	Light emissions at night will be minimised as per Australian Standards	Floodlighting is proposed for night time operations at the landfill	Gunns	AS 4282 -1997	
Visual	2	4.17.8	Gunns will implement a colour scheme which minimises contrast and glare	To minimise visual impact of mill	Gunns		
Visual	2	4.17.8	Gunns will minimise loss of screening vegetation especially on the East Tamar Highway	To screen mill from Viewer's site, minimising visual impact of mill.	Gunns/Construction Contractor		
Aboriginal and Historic Heritage	2	4.18.3	Gunns will prepare a Cultural Heritage Management Plan in consultation with Tasmanian Aboriginal Land and Sea Council, the Aboriginal Heritage Office (DTAE) and Heritage Tasmania (DTAE).	To preserve Aboriginal heritage sites of significance.	Gunns, Tasmanian Aboriginal Land and Sea Council, Aboriginal Heritage Office.	Aboriginal Relics Act, 1975. Historic Cultural Heritage Act, 1995.	The Aboriginal Heritage Office (DTAE).
Aboriginal and Historic Heritage	2	4.18.3	Gunns will develop protection and exclusion zones around key sites in consultation with Tasmanian Aboriginal Land and Sea Council and the Aboriginal Heritage Office	To preserve Aboriginal Heritage	Gunns, Tasmanian Aboriginal Land and Sea Council, Aboriginal Heritage Office	Aboriginal Relics Act, 1975. Historic Cultural Heritage Act, 1995.	The Aboriginal Heritage Office (DTAE).
Aboriginal and Historic Heritage	2	4.18.3	Gunns will include key heritage sites in the pulp mill reserve	To protect sites of significant historic heritage.	Gunns, Tasmanian Aboriginal Land and Sea Council, Aboriginal Heritage Office		The Aboriginal Heritage Office (DTAE)

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Economic and Social	2	6	Gunns will preferentially source labour and services in Tasmania	To boost local employment and service demand. Minimise pressure on accommodation.	Gunns		
Economic and Social	2	6.5.17	Gunns also intends to implement a management plan for limiting the impact of the influx of persons into the George Town precinct	To minimise potential of “artificial boom” in accommodation sector in George Town, which may result in adverse tourism conditions.	Gunns		
Economic and Social	2	6.5.17	Gunns has planned for the construction of accommodation facilities to house up to 800 workers if required to ameliorate these potential effects.	To minimise potential of “artificial boom” in accommodation sector in George Town, which may result in adverse tourism conditions	Gunns	EMP (construction)	
Economic and Social	2	7.8.3	Gunns will closely liaise with landowners at Rowella during the project, particularly during construction phase. Landowners will be advised of the timing and nature of construction activities, particularly activities such as blasting.	To advise of significant activities and to work together to minimise issues and concerns.	Gunns		
Economic and Social	2	7	Gunns plans to manage the need for workers in Tasmania through a collaboration with TAFE Tasmania	To ensure there is not a skills shortage in the local community.	Gunns		

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Economic and Social	2	7	During the operational life of the mill, Gunns intends to provide its staff with ongoing TAFE training courses	Ensure continuation of skill set.	Gunns		
Economic and Social	2	7	Gunns will establish a community liaison group with local community and stakeholders	To enable relevant and timely information to be distributed to the community and stakeholders, ensuring ongoing business and community liaison.	Gunns		
Environmental Controls	1	6.4.1	No contaminated process effluents will be discharged to drain from the wood handling area at the chip mill.	This is an environmental safe guard.	Gunns		
Environmental Controls	1	6.4	All storage and process facilities at the chemical plant will be constructed maintained, and operated in accordance with all relevant Australian chemical safety standards.	For OH&S of employees and for compliance to Australian Standards	Gunns	Construction EMP Dangerous Goods Act, 1998. Australian Standard AS3780 for the storage and handling of Corrosive Substances Dangerous Goods Regulations, 1999	

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Environmental Controls	1	6.4	The handling of chemicals will comply with the Dangerous Substances (Safe Handling) Act 2005, the Dangerous Substances (Safe Transport) Act 1998, and the Dangerous Goods (Road and Rail Transport) Regulations 1998.	For OH&S of employees and for compliance to Australian Standards	Gunns	Dangerous Substances (Safe Handling) Act 2005 Dangerous Substances (Safe Transport) Act 1998 Dangerous Goods (Road and Rail Transport) Regulations 1998	
Environmental Controls	1	6.4	A detailed hazard analysis and risk assessment will be undertaken according to the dangerous substances, workplace, health and safety, electricity and gas safety legislation during the detailed engineering phase of the project.	For OH&S of employees and for compliance to Australian Standards. Also to ensure safe handling, transport and use of chemicals required for pulp processing.	Gunns	Construction EMP Australian Standard AS3780 for the storage and handling of Corrosive Substances Dangerous Substances (Safe Handling) Act 2005 Dangerous Goods Act, 1998	

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Environmental Controls	1	6.4	A noise management plan will be prepared for the design and operational phases of the project and another for the construction phase.	To limit noise levels to within Australian and International Noise Control Standards.	Gunns	Air and Noise Quality Standards. NSW Department of Environment and Conservation (DEC) <i>Environmental Noise Control Manual and Industrial Noise Policy.</i> Draft Environmental Protection Policy (Noise) and Regulatory Impact Statement, January 2003. Australian Standard AS 2187.2 – 2006	DTAE
Transport	2	2	Gunns preferred operation of the pulp mill proposes to utilise the rail transport network as a method of freighting resources to the pulp mill	Minimise log truck presence on road.	Gunns		

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Noise	2	4.15.4	Gunns will implement noise attenuation of existing and new chippers to meet project noise objectives	To maintain level of noise to within the acceptable standard.	Gunns	Draft Environmental Protection Policy (Noise) and Regulatory Impact Statement, January 2003. NSW DEC <i>Environmental Noise Control Manual</i> and <i>Industrial Noise Policy</i> . Air and Noise Quality Standards. Australian Standard AS 2187.2 – 2006	

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Monitoring	1	5	All emissions to air and water will be monitored and recorded continuously to ensure compliance with the Tasmanian guidelines	To ensure compliance with Standards.	Gunns	Air and Noise Quality Standards. Environmental Protection Policy (Air Quality) 2004. EMP (Design). State Policy of Water Quality Management, 1997 Surface Water Quality Standards	
Monitoring	1	6.3.14	Effluent treatment process and quality will be monitored on a daily basis with laboratory analysis from the composite samples	To ensure effluent being released complies with relevant chemical effluent standards.	Monitoring program to be developed by Gunns and DTAE.	BAT guidelines of the European Union New Source Performance Standards of the USEPA Emission Guidelines	DTAE

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Monitoring	1	6.3.14	Effluent quality analyses from inflow to the treatment plant and ocean discharge will be undertaken on a weekly, monthly and annual basis as detailed in the Monitoring Plan for such parameters as defined in the Emission Guidelines.	To ensure effluent quality complies with Emission Guideline requirements	Monitoring program to be developed by Gunns and DTAE.	Emission Guidelines BAT guidelines of the European Union New Source Performance Standards of the USEPA	DTAE
Monitoring			Gunns will also install a continuous monitoring facility of mill emissions				
Environmental Management	2	4	<p>A Construction Environmental Management Plan will be developed in consultation with DPIW and DTAE to mitigate impacts during construction. Sub plans will include:</p> <ul style="list-style-type: none"> ▶ Sediment and Erosion Control Plan ▶ Rehabilitation Plan ▶ Fire Management Strategy ▶ Fauna Management Plan ▶ Vegetation Management Plan ▶ Weed Management Strategy ▶ <i>Phytophthora cinnamomi</i> Management Strategy ▶ Traffic Management Plan ▶ Waste Management Plan ▶ Noise Management Strategy ▶ Landscaping management Plan ▶ Cultural Heritage Management Plan ▶ Construction Traffic Management Plan ▶ Remediation and Revegetation Plan for coast crossing for ocean outfall ▶ Remediation Plan for Donovans Bay crossing 	To ensure all potential environmental impacts associated with construction and operation of the mill have been defined and outlined and management plans are adhered to.	DPIW, DTAE and Gunns		DPIW and DTAE

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Environmental Management	2	4	Impacts and management measures will be included in the Operational Environmental Management Plan for the project and will be monitored and reported as specified.	To ensure all environmental standards are being met.	Gunns		
Environmental Management	2	4	Gunns will establish a compensatory offset for threatened vegetation communities by reserve and covenant (on title) from within the Gunns estate in the north-east region of Tasmania.	A threatened forest species which will be removed during mill construction will be replanted in larger numbers over a greater area to compensate for its removal from mill site in an estate close by	Gunns		
Environmental Management			Gunns will establish a network of reserves at the pulp mill site, which will incorporate approximately 150 ha of native vegetation.				
Environmental Management	2	13	A Rehabilitation Management Plan will be developed for the landfill and quarry prior to construction	To ensure successful rehabilitation of disturbed areas.	DPIW, DTAE and Gunns.	Environmental Management and Pollution Control (Waste Management) Regulations, 2000.	

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Environmental Management	1	6	Gunns will seek to obtain Chain of Custody certification (AS4708 (Int) Chain of Custody for certified wood and forest products), and that pulp produced will be sold as AFS and PEFC certified pulp	This Standard is the national benchmark for verification to guarantee a trace back system from the finished product to the forest. Adherence to this Standard ensures products sold by Gunns have originated from sustainably managed AFS and PEFC certified forests.	Gunns	Chain of Custody Standard (AS4707) Australian Forestry Standard (AS 4708(Int))	
Environmental Management	1	6	Gunns will extend their EMS certification to include its pulp mill processing operations.	So that all activities of Gunns' Forestry Divisions are EMS Certified.	Gunns	EMS to AS/NZS ISO14001	
Environmental Management	1	6	Where harvested by Gunns, forestry operations, which supply the mill, will be conducted in accordance with Gunns' independently certified environmental, forest and chain of custody management systems.	To comply with State and International Standards.	Gunns	Forest Practices Code 2000. EMS to AS/NZS ISO14001 Chain of Custody Standard (AS4707) Australian Forestry Standard (AS 4708(Int))	

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Environmental Management	1	6	Gunns is committed to maintaining best practice and continuous improvement in sustainable forest management, and to maintaining certification to AS/NZS ISO14001, the Australian Forestry Standard, and the Chain of Custody Standard	Compliance to international and globally respected standards.	Gunns	EMS to AS/NZS ISO14001 Australian Forestry Standard and Chain of Custody Standard are elements of The Australian Forest Certification System.	
Environmental Management	1	5	Gunns will ensure that a database is in place for recording environmental and safety incidents and public complaints	For on-Site records and for future analysis of trends in safety and environmental incidents. A means for recording community complaints.	Gunns		
Environmental Management			As part of the Gunns Safety Health Environment and Quality Management System, an environmental audit of the project, initially on a 6 monthly basis will also be undertaken.				