roberts co

Environmental Management Plan

Cumberland West Mental Health Services Relocation Project – Early Works (CWMHSR) May 2024

May 2024

Document Details

Title	Project Environmental (ENV) Management Plan
Client	NSW Health Infrastructure
Document Reference Number	RCo-ENV-PLN-001
Principal Contractor	Roberts Co
Roberts Co Project No.	20019
Principal Contractor ABN	61 620 108 483
Project Address	218 Redbank Rd, Westmead, NSW 2145

Document Authorisation

Will Service	**Darrin Lane**	**Gabrielle York**
PROJECT MANAGER	**SENIOR SITE MANAGER**	**PROJECT HSE ADVISOR**
31/5/2024	31/05/2024	31/5/24
Date	**Date**	**Date**

TABLE OF CONTENTS

1 DOCUMENT CONTROL

All changes made to the Project Environmental Management Plan are recorded in the amendment table below. The version number and date of revision for the current document revision are shown in the-footer of the document.

1.1 Revision History

Revision	Date	Description of changes	Prepared by	Approved by
1	31 July 2023	Initial Version	WS	DV
2	23/08/2023	Updated to include Soil and Erosion controls	OH	WS
3	8/11/2023	Updated Soil and Water Management Section	OH	WS
4	17/11/23	Updates following Environmental Audit, Appendix 07 – Conditions of Approval Compliance Tracking Matrix links added	GY	WS
5	16/2/24	Updated Appendix 1	GY	WS
6	31/5/24	Updated Appendix 1	GY	WS

1.2 Management reviews

Review date	Details	Reviewed by

1.3 Controlled copies

Name	Position	Date	Revision

2 DEFINITIONS AND ABBREVIATIONS

Term/Abbreviation	Definition
AS/NZS	Australian Standard/New Zealand Standard
Client (Principal)	The party to whom Roberts Co is contracted for a Project
Client's Representative	The person appointed by the Client to perform the duties of the Principal's Authorised Person as defined in the contract
Consultant	The party engaged to perform the design, preparation of detailed 'For Construction' documentation and necessary certification to meet contractual requirements.
D&C	Design and Construct
ECP	Environmental Control Plan – defines management measures for a specific environmental aspect
EEO	Energy Efficiency Opportunities
HSE	Health, Safety and Environment
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
ESS	Environmental Effects Statement
EMP	Environmental Management Plan – this document
Environment	The Project's surroundings, including air, water, land, flora, fauna, humans and their interaction
Environmental Aspect	An element of the Project that has potential to cause environmental impacts
Environmental Impact	A change to the environment, positive or negative, caused by environmental aspects
EPBC Act	Environmental Protection and Biodiversity Conservation Act (Commonwealth) - legislation to protect and manage matters of national environmental significance
EPA	Environment Protection Authority
ESD	Ecologically Sustainable Development
H&S	Health and Safety
HSC	Health and Safety Committee
HSEQ	Health, Safety, Quality and Environment
IMS	Integrated Management System
ITP	Inspection and Test Plan – defines the steps to be taken to check and verify an activity or product
NGER	National Greenhouse and Energy Reporting
OEH	Office of Environment and Heritage
O&M	Operations and Maintenance
PAP	Principal's Authorised Person

Term/Abbreviation	Definition
PM	Project Manager
PMP	Project Management Plan
PP	Process Procedure – A work instruction, which details the technical/engineering/safety/quality/environmental methodology for a particular activity
RCo	Roberts Co
SEP	Site Environmental Plan – site level document providing a map or spatial representation of the site identifying the location of specific environmental controls and sensitive areas, and detailing practical environmental management methods to be implemented at specific work sites
SDS	Safety data sheet
SWMS	Safe Work Method Statement – a planning process to determine detailed methodology, identification of hazards, risks and control measures, used to break down and analyses individual PRA work elements. Specific risk assessment based on day-to-day tasks, facilitated by supervision and involving consultation with workforce before task is undertaken. Signed off by all people undertaking the task.
Subcontractor	Any company, body or person who is contracted to Roberts Co for the purpose of supplying plant and/or services
System Element	The administrative activities that need to be implemented and controlled to ensure that the product or service meets environmental requirements
The Project	Cumberland West Mental Health Services Relocation Project – Early Works (IMHC)
TMP	Traffic Management Plan
PRA	Project Risk Assessment – High level strategic risk assessment conducted on the workplace and broken down into work components for the purpose of identifying system, training and legislative controls requirements, and identifying the need for further detailed planning and risk assessment activities. The PRA also fulfils the function of an aspects and impacts register.

Table 01 – Terms of reference, definitions, and abbreviations.

3 PURPOSE AND APPLICATION

This Environmental Management Plan ("**EMP**") for the IMHC Early Works ("**The Project**") outlines the Roberts Co system for managing and minimising the environmental impacts of its activities, meeting its legislative and contractual obligations and providing a means of continually improving environmental performance.

This EMP provides a 'road map' for the implementation of the Project Environmental Management Systems, including plans, procedures and forms. It provides directions to the documents required to address Environmental Management for the Project. This EMP is for use by all Project personnel and subcontractors during the Project [include relevant phases]:

– Design
– Procurement
– Construction
– Commissioning

3.1 Environmental Management Plan

The EMP has been developed in accordance with the requirements of ISO 14001 and the Roberts Co Integrated Management System. It incorporates the requirements of the contract / project scope / tender documents including:

– Legislative and contractual requirements and other environmental obligations
– Approval conditions
– RCo Environmental Policy objectives
– Objectives and measurable targets associated with the potential environmental impacts of the Project
– Processes and procedures that Roberts Co will adopt to identify, manage and control the environmental aspects and impacts (using a risk management approach)
– Provision of adequate resources and allocation of responsibilities for ensuring the effective implementation of this EMP
– Methods for maintaining records and requirements for reporting
– Process for monitoring and reviewing the environmental management performance of the Project to drive continual improvement

This EMP has been revised to incorporate all relevant contractual information and obligations.

Project-based Roberts Co personnel are required to sign the EMP acknowledgment form in Appendix 02.

3.2 Supplementary Plans

Supplementary Plans may be required by the contract or deemed necessary by the Project Manager. Supplementary environmental plans that are required will be included as annexures to this plan.

Other environmental management plans may include, but not limited to the following [include relevant plans]:

– Noise and Vibration Management Plan
– Waste Management Plan
– Traffic Management Plan
– Community & Stakeholder Engagement Plan

3.3 Interfacing with Other Plans

This EMP should be read in conjunction with the other suite of Project specific management plans [include relevant plans]:

– Project Management Plan
– Construction Management Plan
– Design Management Plan
– Work Health and Safety Management Plan
– Quality Management Plan
– Workplace Relations Management Plan

3.4 Environmental Policy

The Project and its nominated contractors will operate in accordance with the RCo Environmental Policy as shown in Appendix 01. The policy is reviewed and endorsed on an annual basis by the Chief Executive Officer (CEO) to ensure its ongoing suitability and effectiveness.

The Project's commitment to the Environmental Policy will be demonstrated by:

– Communication of the policy intent to all personnel through inductions and notice board displays
– Provision of adequate resources and assigning responsibilities to implement and maintain the EMS
– Achievement of the Project Targets / Objectives and regular reviews to manage their suitability and effectiveness

3.5 Project Scope

The Cumberland West Mental Health Services Relocation Early Works project (CWMH Early Works) forms part of the Westmead Health and Education Precinct redevelopment. The new purpose-built Mental Health Complex will offer the potential to transform care through new holistic service models co-located with physical health services and better integrated with mental health services in the community.

The CWMH Early Works project is the first stage of the new Westmead Integrated Mental Health Complex (IMHC), with main works scheduled to commence in April 2024. The scope of the early works includes the following works split into two separate approvals:

REF

– Construction of the P14 Car Park ramp and associated access controls.
– Services diversions including private sewer and trade waste, Sydney Water sewer, water main, LV, communications fibre cabling and lighting.
– Demolition of the BIRS, WRPO and Casuarina Lodge buildings.

SSDA

– Bulk earthworks.
– Piling.
– Retention structures.
– HV conduit installation.
– Diesel tank installation.
– Trenching for inground hydraulic.
– Stormwater works.
– Bioretention basin.

3.6 Receiving Environment

The IMHC Early Works is to be completed within the operational Westmead Health and Education Precinct. The works will therefore be completed within a live hospital environment with works potentially affecting staff and patients.

Milestone 1

Impacted receivers:

- Care Flight – access to be maintained, Noise and Vibration Management Plan to be followed
- LHD – Access to be maintained, Noise and Vibration Management Plan to be followed
- Childcare - Access to be maintained, Noise and Vibration Management Plan to be followed
- BIRS – Manage workers nearby
- Casuarina Lodge – Manage workers nearby
- The works may uncover the 1902 tram line which documentation shows ran just south of the site. Archaeologist to be on site for any excavation works in the vicinity of the tram line

Milestone 2a

Impacted receivers:

- CASB – access to be maintained, Noise and Vibration Management Plan to be followed
- BIRS – Access to be maintained, Noise and Vibration Management Plan to be followed
- Childcare - Access to be maintained, Noise and Vibration Management Plan to be followed
- Pathology – Access to be maintained, Noise and Vibration Management Plan to be followed
- Casuarina Lodge – Manage workers nearby

Milestone 2b, 3 and 4

Impacted receivers:

- CASB – access to be maintained, Noise and Vibration Management Plan to be followed
- Childcare - Access to be maintained, Noise and Vibration Management Plan to be followed
- Pathology – Access to be maintained, Noise and Vibration Management Plan to be followed
- The works may uncover the 1902 tram line which documentation shows ran just south of the site. Archaeologist to be on site for any excavation works in the vicinity of the tram line

Demolition of the BIRS, Casuarina Lodge and WPRO Building are to be completed in accordance with the Cherrie Civil Engineering Demolition Methodology plans.

3.7 Approach

RCo is committed to undertaking business in a manner that recognises the importance of environmental protection and sustainability through a risk and opportunity-based approach.

Our vision is to achieve environmental excellence through:

– Shared responsibility for self-regulation and continual improvement

– Understanding and accepting environmental accountability and responsibility

– Ensuring effective communication of information for improved performance

Environmental Risk and Opportunity

Prior to the commencement of works, the Project will identify environmental risks and opportunities, in order to limit, manage and improve the impact of works.

Overall risks to the project are managed through the Project Risk Assessment (PRA) (Refer to WHS Plan). Additional risks and opportunities may be identified during the Project and this EMP should be updated to reflect these changes. As defined in the **RCo-PROC-011_Risk Management**, a risk may have a positive

or negative impact, however in order to differentiate controls required verses improvement potential, for the purpose of this EMP they have been classed as Risks (negative impact) and Opportunities (positive impact).

Environmental risks and opportunities of particular importance to this Project are defined in the Environmental Control Plans (ECP's) within this plan and the PRA.

4 LEGAL AND OTHER REQUIREMENTS

All personnel associated with the project will comply with all relevant requirements including:

- Laws – Acts, regulations, policies, etc;
- Environment Protection Licence (if applicable) and permits;
- Development consents, and;
- Relevant industry standards / codes.

An assessment of the relevant legislative instruments has been conducted and recorded in **Appendix 03**.

Compliance conditions shall be incorporated into this EMP. Specific details and controls are included in the associated sub-plans, project risk assessment and / or environmental risk action plans (ERAPs).

A copy of relevant Permits, Licences and any development approvals relevant to RCo activities will be kept on site.

4.1 Project Approval and Development Consent

The works are to be delivered in line with the following legislation:

NSW	Environmental Planning and Assessment Act 1979 No 203 Part 5

The approval process includes specific planning conditions and commitments that must be addressed in this EMP and delivered during the project.

A Conditions of Approval Compliance Tracking Matrix will be established upon commencement to ensure the approval conditions are captured, addressed and closed out. The Matrix includes all relevant conditions to Roberts Co's scope of work and will be updated as the works progress and reviewed on a quarterly basis to verify compliance with each condition.

Specific conditions of approval relevant to construction activities are included in the project's Operational Controls in the aspect specific Environmental Risk Action Plans (ERAPs).

Non-compliances with the conditions will be documented and addressed as per the Roberts Co Integrated Management System.

5 OBJECTIVES AND TARGETS

The project is committed to maintaining a high level of excellence in environmental compliance and diligence. Project objectives and targets have been developed to establish a baseline for the success of the project to be measured on. The objectives and targets are defined in Table 03 and 04, and in aspect-specific Environment Control Plans.

RCo has committed to the following Performance Targets:

Objectives	Target
Environmental Incident Frequency Rate (EIFR) = No. reportable/serious incidents x 1,000,000 divided by the man hours worked for the period	0.00
Breaches & Infringements	Nil
Certification Major Non-Conformances	Nil

Table 03 – RCo company-wide performance targets.

Objectives	Target
Conduct regular Environmental Inspections	Weekly– completion of environmental inspection checklist
Conduct regular Environmental Observations	Supervisors to complete regular task observations (target set by the project)
Prevent serious Environmental Incidents	Nil Class 1 or 2 incidents
Complete the project with no statutory environmental infringements, prosecutions or breach of conditions of approval	No infringements No prosecutions No breaches of conditions of approval
Conduct operations in accordance with Community and Regulatory expectations	No substantiated community complaints relating to works outside of approval No breaches of conditions of approval

Table 04 – Project specific objectives and targets.

6 RESPONSIBILITIES AND AUTHORITIES

Authorities and responsibilities for all positions are defined in this plan below and communicated in job descriptions and other project documentation. Key responsibilities are indicated in the project organisational chart. Key responsibilities and authorities include;

6.1 Construction Manager

- Ensure that independent audits of the system are conducted
- Review audit outcomes and take action as necessary
- Review regional environmental performance through the monthly reporting cycle
- Authorise resourcing on environmental issues
- Resolve major issues which cannot be resolved by the Project Manager
- Ensure that internal audits of the system are conducted
- Review audit corrective actions and take action as necessary to ensure timely close out of issues

6.2 HSEQ Manager

– Provide environmental support to the project team
– Consult project team on updates or changes to legislative requirements
– Facilitate internal and external audits
– Consult with environmental regulator on key environmental issues, incidents or breaches

6.3 Project Manager

– Ensure that project responsibilities and authorities are defined and communicated
– Provide adequate resources to meet environmental objectives
– Approve the EMP and various sub-plans and ensure effective implementation and maintained
– Allocate appropriate resources and provide support for the implementation of the EMP
– Report to senior management on the environmental performance, including assurance, incident and/or environmental breaches
– Take action to resolve environmental non-conformances and incidents
– Ensure suppliers and subcontractors comply with requirements;
– Report environmental incidents to the client / local authorities, as required.

6.4 Site Manager

– Supervise all site construction activities and personnel by ensuring that they meet environmental and other requirements
– Organise and manage site plant, labour and temporary materials
– Ensure that site environmental controls are properly maintained and provide support to the Project HSE Manager/Advisor
– Report all environmental incidents
– Take action to resolve non-conformances and incidents
– 24hr Site Contact for the project is Senior Site Manager Darrin Lane 0409 609 709.

6.5 Procurement

– Carefully select suppliers and subcontractors based upon their ability to meet stated requirements
– Ensure that purchase orders and agreements include environmental requirements as necessary
– Where practical, select materials which are “environmentally friendly”

6.6 Project HSE Advisor / Manager

– Ensure that the EMP is effectively established, implemented and maintained on the project
– Ensure compliance with all relevant statutes, regulations, rules, procedures, standards and policies

- Liaise with the Principal's Environmental Representative and/or Superintendent on environmental issues, including the written notification of non-conformances (incidents, emergencies or deviations from the EMP)
- Ensure that all personnel on site receive appropriate environmental induction and training and are aware of their environmental responsibilities under relevant legislation and the contract
- Report to the Project Manager on the performance of the system and improvement opportunities
- Provide support to the project team to enable them to meet their environmental commitments
- Ensure that environmental records and files are collected and maintained
- Regular compliance checking as required by this EMP
- Ensure that non-conformances and environmental incidents are recorded, and written reports provided to the Client's Representative and/or HSEQ Manager in accordance with ***RCo-PROC-012 Incident Management and Reporting***. Liaise with the required stakeholders to confirm the nature of the corrective action required and comply with the timeframe within which corrective actions must occur
- Ensure that environmental controls, materials and equipment are maintained

6.7 Contractors

- Comply with all legal and contractual requirements
- Comply with site environmental requirements
- Comply with management / supervisory directions
- Participate in induction and training as directed
- Report all incidents in a timely manner

6.8 All Personnel

- Comply with the relevant Acts, Regulations and Standards
- Comply with the Company's environmental policy and procedures
- Promptly report to management on any non-conformances, environmental incidents and/or breaches of the system
- Undergo induction and training in environmental awareness as directed by management
- Report all incidents
- Act in an environmentally responsible manner

7 OPERATIONAL CONTROL

7.1 Environmental Risk Assessment and Control

Project wide environmental obligations, aspects and impacts, and risks associated with the project shall be identified and assessed prior to the commencement of the project by the Project Manager in consultation with the project team and recorded in either or all of the following risk assessments or documents, as required:

- Project Risk Assessment (PRA) – (refer to WHS Plan-Appendix 04)
- Environmental Risk Action Plans (ERAPs) contained in **Appendix 04** of this plan
- Sub-plans or standalone documents referenced below
- SWMS, Inspection and Test Plans / check sheets (as appropriate)
- Work instructions or procedures (e.g., refuelling and servicing)

Risks levels (i.e., Consequence and Likelihood) in relation to environmental Aspects and Impacts rated as 'High' or 'Medium' are considered 'Significant' as they have the potential to adversely impact on the environment, result in additional costs, potential fines and/or damage Roberts Co's reputation.

Significant environmental issues, with a risk ranking of High or Medium, will be controlled to a degree which is commensurate with the level of risk and the level of influence which the company has over these issues. The control measures to address these issues are documented in Environmental Risk Action Plans which are contained in **Appendix 04**.

Activities, aspect or impacts that represent a high risk after control measures have been applied must be reviewed / redesigned or have approval of the Construction Manager and HSEQ Manager.

7.2 Hold Points

The activities outlined in the table below are not to proceed without objective review and approval by the nominated authority. Proceeding past a specified Hold Point without authorisation is deemed as a system non-conformance.

These activities below are considered hold points.

ITEM	PROCESS HELD	ACCEPTANCE CRITERIA	APPROVAL AUTHORITY
Environmental Management Plan	Site activities	Site specific Environmental Management Plan has been developed, reviewed and approved	Project Manager
Dewatering	Dewatering / pumping water off the site		Site Manager
Sediment and erosion control measures	Construction activities involving ground disturbance	Sediment and Erosion Control Plan has been developed, reviewed, approved and implemented	Project Manager
Site clearing / vegetation removal	Commencement of site clearing or vegetation removal	Clearing limits have been verified against the project approval environmental assessment, limits have been set-out and vegetation to be retained has been delineated and or protected	Project Manager
Construction Methodologies – direct delivery and subcontract works	Construction process representing potential medium or high impact to the environment	Construction methodology / SWMS / JSEA have been reviewed by the Site Environmental Management Representative and addresses the requirements of the EMP ERAPs	Responsible Engineer
Dangerous Goods	Transport of dangerous goods	Verification that transport vehicles meet the requirements	Site Manager
Dangerous Goods	Storage of dangerous goods	Verification that bunded storage is provided and that offset distances are maintained for the storage area	Site Manager

ITEM	PROCESS HELD	ACCEPTANCE CRITERIA	APPROVAL AUTHORITY
Controlled / Hazardous Waste	Transport of Controlled / Hazardous waste from the site	Verification that the waste has been classified in accordance with the guidelines, transport licensing in place and landfill can lawfully receive the waste	Project Manager
Spoil Transport	Removal of spoil from site	Verification that the spoil has been classified and the disposal location can lawfully receive the waste	Project Manager

Table 05 – Environment control hold points.

7.3 Environmental Control Plan

The project Environmental Control Plan(s) ("**ECP**") is prepared to assist in the planning and delivery of the project. It is specific to the site or work area and outlines the location of protection measures, monitoring requirements, conditions of approval and environmentally sensitive areas. It is the practical application of the proposed control measures.

A copy of the project ECP is provided in Appendix 05 of this EMP.

The ECP is to be used in project inductions, work site set-up, reviewing ongoing environmental performance, included as information in tender documents to subcontractors (where applicable) and in support of ancillary environmental approvals.

The project ECP shall include but not limited to:

- The worksite layout and boundary, including entry/exit points and internal roads and clearing limits
- Location of adjoining land-use and nearest noise sensitive receivers
- Location and type of sediment and erosion control measures, including size / capacity of detention basins and wheel wash facilities
- Location of site offices
- Location of spill containment and clean-up equipment
- Location of worksite waste management facilities
- Hours of work applicable to the worksite (including deliveries and any restrictions on high noise generating activities);
- Document control and approval details
- Location of environmentally sensitive areas (e.g., threatened species, critical habitat, contaminated areas, heritage zones, etc)
- Vegetation and trees to be protected
- Location of known heritage (indigenous and non-indigenous) items
- Location of stormwater drainage and watercourses leading to / from the worksite
- Specific environmental management requirements from licenses, approvals or permit conditions
- Key environmental risk issues and the specific mitigation measures

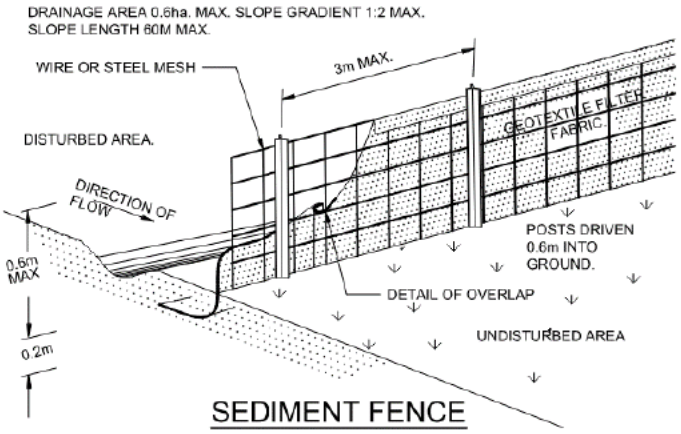
The plan is in addition to any erosion and sediment control plans or other documentation that specify the location of environmental controls on site.

7.4 Soil and Water Management

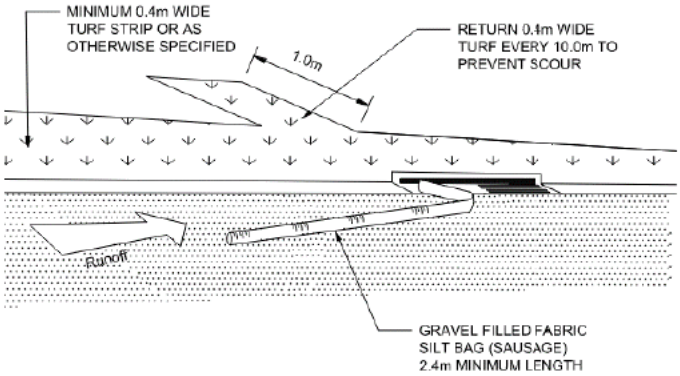
Soil and Water Management is to be implemented throughout the construction of the project to ensure the minimisation of impacts to the environment by erosion of soil and subgrade material by the operations taking place.

Soil and erosion controls consist primarily of sediment fences to be set up prior to construction which will serve to catch material disturbed by construction works. Sediment fences will be made up of wire/steel mesh covered in geotextile fabric and supported by posts driven into the ground. Sediment fences will be positioned along slopes ensuring they are perpendicular to the direction of flow of runoff from disturbed areas. Fabric Stocking Kerb Inlet Traps will be used to prevent sediment being discharged into the surrounding stormwater system through kerb stormwater inlets. Geotextile Filter Fabric Drop Inlet Sediment Traps will be set up around some Grated Inlet Pits to prevent sediment from discharging into surrounding stormwater system.

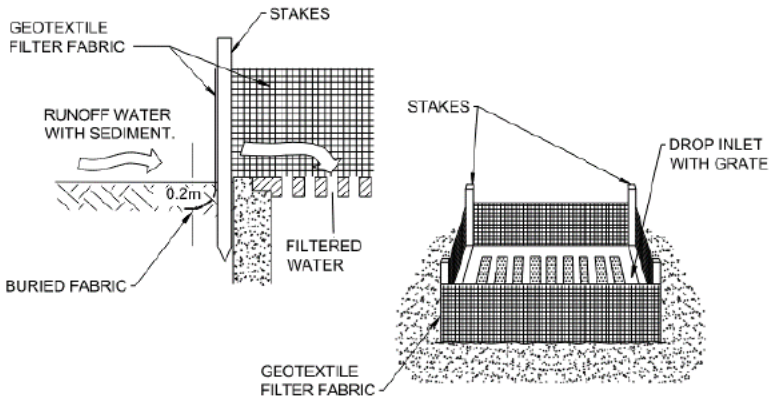
All loose material stockpiles will be located within the temporary construction compounds, ensuring they are protected by the implemented soil and erosion controls.



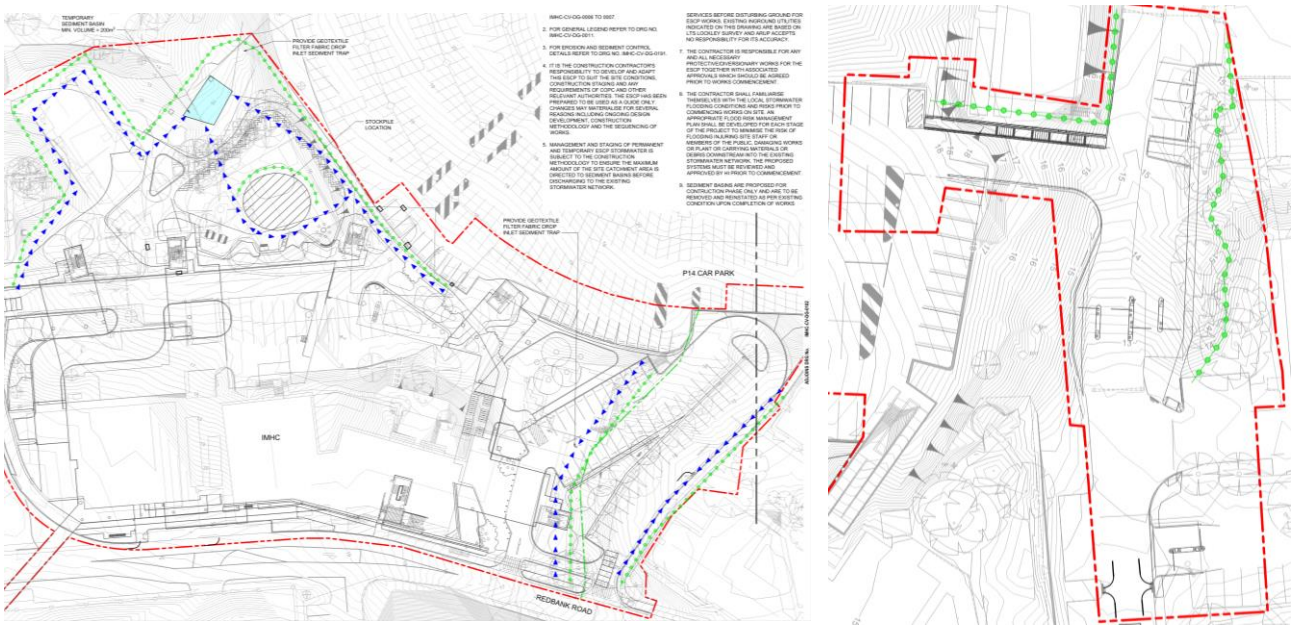
SEDIMENT FENCE



FABRIC STOCKING
KERB INLET SEDIMENT TRAP



GEOTEXTILE FILTER FABRIC DROP
INLET SEDIMENT TRAP



The contractor will develop and adapt the existing control plan to suit the conditions of the site. The management and staging of permanent and temporary ESCP stormwater will ensure the maximum amount of stormwater is directed towards sediment basins before entering existing stormwater network.

Where possible, all soil and water management control measures will not be removed until disturbed areas have stabilised. Areas where vegetation is disturbed will be revegetated once works have complete. Excess spoil resulting from construction will be seeded post construction to minimise the likelihood of movement from site by wind or water. Any damage to the ground surface will be restored to pre-construction condition upon the completion of works.

The location and depth of any inground services will be determined by the contractor prior to disturbing the ground to implement erosion and sediment controls. The contractor will understand the local stormwater flooding conditions prior to works commencing. A flood risk management plan will be developed and maintained to prevent injury to workers or the public in the case of flooding, as well as preventing dispersion of materials or debris into the existing stormwater network; see Construction Soil and Water Management Plan & Construction Flood Emergency Response Sub-Plan.

7.5 Design

If the project is a design and construct contract in which RCo is responsible for the design functions. The following environmental issues should be considered during the design of the temporary works:

– How to minimise any adverse impacts on the environment including energy efficient operation, incorporation of sustainable or recycled materials
– How to improve design efficiency to conserve natural resources
– Address specific sustainability requirements
– How to meet environmental codes, regulations and other requirements

These issues should be considered, while taking into account the practicalities and economic realities of the project / workplace. The design process is controlled in accordance with the Project Design Management Plan.

7.6 Procurement

The supply of goods and / or services by suppliers and subcontractors will be controlled by the Project and Contracts Managers as follows:

- Environmental issues should be taken into account when selecting subcontractors and suppliers
- Suppliers of chemicals and hazardous substances will be required to submit safety data sheets with delivery or prior to chemicals arriving on site. Prior approval to bring hazardous substances to site may need to be obtained from the client / superintendent
- Subcontractors will be required to submit an environmental control plan covering work which is likely to have a significant impact on the environment. Alternatively, they will be required to work under this EMP

The environmental performance of subcontractors will be monitored during site inspections.

7.7 Handling, Storage, Packaging and Transport

The handling, storage, packaging and transport of goods will be controlled in accordance with the applicable regulations, codes and standards.

Dangerous Goods/Hazardous materials will be stored and handled in accordance with Safety Data Sheets and the requirements of the Australian Dangerous Goods Code.

The following legislative acts includes specific requirements in relation to the transport of dangerous goods. Where dangerous goods are to be transported as a result of the project, the requirements of the Act must be complied with by RCo and third parties:

NSW	Dangerous Goods (Road and Rail Transport) Act 2008 No 95

Regardless of the quantity, appropriate transport documentation must be included with each load unless a specific exemption exists.

Transport documentation must include the following:

- Project/workplace name, contact number
- Transporter name, contact number
- Transport date, origin and destination
- Product name, classification, container type, quantity

These materials will be stored in a safe area (e.g., bunded and/or store) which will prevent or contain accidental spillage and harm to the environment. Further details are provided in **Appendix 04** in the ERAP - Delivery and Storage of Chemicals, Fuels and Oils and including Dangerous Goods requirements.

Safety data sheets must be stored along with or at the point of storage and/or freely accessed using the ChemAlert application.

7.8 Plant and Equipment

Plant and equipment used onsite by RCo and contractors will be maintained in a safe and serviceable manner in accordance with both legislative requirements and RCo IMS procedures and standards.

In particular, the following requirements apply:

– Plant will be inspected (using the relevant Pre-Use Acceptance Checklist) prior to operation on site, particularly items with the potential to impact the environment are to be inspected. Items found to be worn, damaged or otherwise degraded are to be replaced prior to operation;

– Plant will be serviced, re-fuelled and washed-down only in approved areas where hydrocarbons can be captured and then properly disposed;

– Fuelling will be carried out in bunded areas when fuelling from bulk tanks (where applicable);

– Plant and equipment will be maintained to prevent / fix oil leaks;

– Plant will be driven and operated only in approved areas;

– Plant will have effective pollution control and sound attenuation devices fitted.

7.9 Emergency Preparedness and Response

The types of environmental emergencies which could occur on this site as outlined in **Appendix 06**. The client and relevant statutory and regulatory authorities (such as the EPA) will also be informed as necessary.

Environmental emergencies will be handled by:

– Immediately reporting all incidents to the Project Manager / Site Manager who will assess the situation and manage the following steps:

– Immediately take all reasonable steps to contain further damage or danger to personnel and the environment;

– Inform relevant authorities in accordance with the regulatory requirements;

– Contact emergency service personnel as necessary (e.g., local fire brigade, spill clean-up services, etc). Site emergency response team will also be contacted.

– Provide notification to the HSEQ Manager, Construction Manager, CEO and Roberts Co Legal counsel immediately via initial internal incident notification;

– Inform the Client's Representative as necessary and in accordance with contractual requirements;

– Complete a detailed report of the incident using HSE Incident report form and upload to Roberts Co's designated electronic database;

– Liaise with the Client's Representative regarding corrective and preventive actions required and the timeframes within which these actions must occur;

– The designated personnel will undertake an investigation to determine the corrective and preventive actions.

Information on the handling of hazardous materials is contained in the safety data sheet application, ChemWatch. Emergency Services contact numbers are to be displayed in the main site office.

8 MONITORING AND MEASUREMENT

Key characteristics of the project operations and activities which have a significant impact on the environment will be regularly monitored and measured.

Monitoring / Reporting Aspect	Details
Inspection and Monitoring	Site Supervisor will perform fortnightly environmental inspections and monitoring during the site establishment, construction and site demobilisation phases. Inspections and monitoring will be carried out in using **RCo-HSE-101-HSE Inspection** form. Project Procedures will be prepared as necessary to specify how monitoring is to be undertaken, including responsibility and frequency. Monitoring results and any corrective actions identified will be recorded in Roberts Co designated electronic database. National Greenhouse and Energy Reporting related information will be collected and uploaded into Roberts Co designated electronic database. Inspection checklists and any corrective actions identified will be recorded in Roberts Co designated electronic database.
Calibration of monitoring equipment	Monitoring equipment will be calibrated in accordance with equipment OEM manual. Monitoring equipment will be calibrated prior to use. Any equipment identified as having doubtful accuracy or precision will be removed from use and recalibrated. Where any monitoring equipment is found to be out of calibration, the validity of the previous monitoring results will be assessed and documented. Calibration of monitoring equipment will be recorded in the project document management system.
Reporting	The following information will be retained for inclusion in the Reports as follows: – HSE Inspections (Project) – HSE Incidents / complaints (Project) – Waste, water use data (NGERS – Annually) – Innovations and achievements. This information may also be included in the Client Monthly Report Reporting on environmental performance may be carried out in the forums as required.
Non-conformance and Incident Management	Non-conformance Reports will be raised, tracked and closed out in accordance with **RCo-PROC-010_Audits, Inspections and Corrective Action** Incident Reports will be raised, tracked and closed out in accordance with **RCo-PROC-012_Incident Management and Reporting Procedure**.

Table 06 – Environment control hold points.

The following environmental issues / non-conformances are to be included within **RCo-REG-009-Incident and Event Tracking Register** and/or **RCo-REG-003-Action** respectively, as corrective actions.

– Internal inspection outcomes that cannot be rectified immediately;

– Incidents and associated corrective actions;
– Internal audit observations/non-compliance;
– Client audits or other notice of non-compliance;
– Notices or action from regulatory authorities.

Where deemed necessary by the Project HSEQ Advisor / Manager and as a result of revisions to project scope or changes to project risks, additional Environmental Risk Action Plans to control potential impacts may need to be updated or developed.

8.1 Corrective Actions

Corrective actions are differentiated by risk ranking. The nominated timeframes to resolve items on the CAR Register are as follows:

1 = High	2 = Medium	3 = Low
Action: Imminent risk – issue must be rectified immediately	**Action:** Risk not imminent however issue is to be rectified immediately.	**Action:** Rectify within 24 hours or time frame specified.

Refer to **RCo-PROC-010_Audits, Inspections and Corrective Action** Procedure.

Further monitoring and reporting activities against operational objectives and targets are listed in Section 05 of this Plan.

8.2 Monthly Environmental Reporting

Each report to be included in the Monthly Project HSE Report and issued to the HSEQ Manager on a monthly basis. The report is to include specific details relating to risks, status of control measures, update to plans, ESCPs and the objective and target performance indicators nominated within the report.

On a monthly basis, monthly environmental indicators, energy use, water consumption and waste information shall be entered into RCo designated electronic database, including NGER information, such as:

– Waste consumption including volume purchased from water suppliers, volume of water extracted from surface water sources and volume of ground water sources
– Subcontractor energy and emissions

Monthly oversight of inspection outcomes, audit issues and corrective actions provided through the Actions created within Roberts Co's designated electronic database. Actions are to be addressed in accordance with the timeframes outlined in **RCo-PROC-010_Audits, Inspections and Corrective Action**.

9 INCIDENTS, COMPLAINTS, CORRECTIVE AND PREVENTATIVE ACTION

9.1 Incident Classifications

Environmental Incident is classified into three (3) classes:

Permanent / Long-Term Damage	Short to Medium Term Damage	Short Term / Nuisance Damage
Environmental Incidents that create permanent or long-term damage to the environment. This damage will result in the environment taking 12 months or more to return to pre-existing conditions. Major environmental. investigation and potential for large prosecution.	Environmental Incidents that create short to medium term damage to the environment. This damage will result in the environment taking up to 12 months to return to pre-existing conditions. Potential for prosecution or infringement notice.	Environmental Incidents that typically cause short term or nuisance damage. The damage is easily rectified usually within one day. These incidents do not cause medium or long-term damage.
Where permanent / long-term damage occurs the Chief Executive Officer, HSEQ Manager, Construction Manager and Roberts Co Legal counsel are to be informed immediately. These incidents shall be subject to an Incident Causal Analysis Method (ICAM) investigation.	Where actual or potential short to medium term damage has occurred, Roberts Co Senior Management is to be informed via the Project Manager.	Where an incident such as this has occurred, the Roberts Co Site Manager or immediate Senior/Site Supervisor is to be informed. These types of incidents must be recorded on ***RCo-REG-009-Incident and Event Tracking Register.***
All environmental incidents will be reported to the relevant State & Federal Authorities as required under relevant Acts & Regulations.		

Table 07 – Environmental incident classification types and reporting requirements.

9.2 Incident and Complaint Reporting

All environmental incidents and complaints are to be reported, investigated and actions closed out in accordance with **RCo-PROC-012_Incident Management and Reporting.**

All incidents are to be recorded on **RCo-REG-009-Incident and Event Tracking Register** or in agreed electronic system.

RCo-FRM-018-Injury and Incident Investigation Report shall be completed and issued to the Project Manager for all Potential or Actual reportable and serious incidents.

Reporting of Actual and Potential reportable and serious Incidents and complaints shall occur within the timeframes outlined in the **RCo-PROC-012_Incident Management and Reporting procedure**.

Reportable incidents shall be reviewed by relevant personnel in the distribution list above prior to the issue of formal correspondence to external parties or regulatory authorities. Authorities are to be notified in accordance with the legislative time frames in the applicable state.

Complaints will be reported to external authorities in accordance with specific licence/permit or approval requirements. RCo will provide notification of the incident/complaint to the Client's Representative as required and in accordance with the contract.

Client Notification Type	Contract Requirement
Initial verbal notification	Use project Whatsapp group to notify the PAP and Principal.

Environmental Incident report requirements	Preliminaries Section 6: Monthly Reporting including details of any incidents.

Table 08 – Client incident reporting requirements.

9.3 Investigations

Each incident shall be sufficiently investigated to allow specific and detailed corrective and preventative actions to be identified, actioned and closed out. Where an environmental non-conformance or incident is identified, Corrective and preventive actions shall be developed and may include:

– Review and improve existing environmental controls and job safety analyses/ work method statements
– Site rehabilitation
– Increased site inspections and monitoring
– Modify construction or installation methods
– Increase environmental awareness including re-training and tool-box meetings

The Project Manager will convene a briefing with relevant members of the Senior Management Team to provide an update on the incident investigation and to allow active involvement in the investigation process. The briefing will include discussion on the progress of the investigation and any specific initial findings. A status report on any rectification work or maintenance activities to the relevant environmental controls will also be provided.

The following information relating to the incident investigation shall be forwarded to the Construction Manager and Regional HSEQ Manager.

9.4 External Incident Notification

The EPA must be notified immediately of all pollution incidents that cause or threaten material harm to the environment. The HSEQ Manager (or their delegate) shall report the incident to the regulator, refer to **RCo-PROC-12- Incident Management and Reporting**.

Harm to the environment is “material” if the effect (or potential effect) from an incident on the health or safety of humans or ecosystems is not trivial and or results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000.

Incidents requiring notification to the EPA must also be immediately notified to the Regional HSEQ Manager.

If an incident presents an immediate threat to human health or property, 000 is to be called in accordance with the procedures outlined in the project Emergency Response Plan – Appendix 05 of the WHS Plan.

The EPA Environment Line is to be contacted on 13 15 55 (NSW) or 1300 372 842 (VIC).

The notification will need to include information on:

– The time, date, nature, duration and location of the incident
– The location of the place where pollution is occurring or is likely to occur
– The nature, the estimated quantity or volume and the concentration of any pollutants involved
– The circumstances in which the incident occurred (including the cause of the incident, if known)
– The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution

– Other information prescribed by the regulations

In addition to notifying the EPA of pollution incidents, other authorities as outlined below must also be notified immediately:

– The Ministry of Health (via the local Public Health Unit - 02 9391 9000)
– The SafeWork NSW Authority (13 10 50)
– WorkSafe Victoria (13 23 60)
– Fire and Rescue 000
– The local council

Regardless of the actual or potential impact, these authorities must be notified under the amended legislation for all notifiable pollution incidents. Further information in relation to the incident must be provided immediately if it becomes available after the initial notification. Records of contact with and details of the information provided to external authorities must be maintained in the project records.

9.5 Commonwealth Matters

Environmental incidents relating to the Environmental Protection and Biodiversity Conservation Act 1999 must be notified to the Secretary of the Department within seven (7) days of the event.

These types of incidents include the death or injury to the following:

– Migratory bird species;
– Listed marine species;
– Threatened species or listed ecological community (includes taking).

9.6 Client Complaints

All communications from the Client (including CAR's and Audit reports) expressing concern or dissatisfaction with the implementation or operation of the EMP shall be documented in accordance with Section 9.2 of this plan.

Corrective and preventive actions may include:

– Site remediation and rehabilitation
– Increased site inspections and monitoring
– Increase environmental awareness (i.e., re-training, tool-box meetings)

Review and improve existing environmental controls and job safety analyses / work method statements

10 TRAINING AND AWARENESS

All employees will receive suitable environmental induction / training to ensure that they are aware of their responsibilities and are competent to carry out the work.

Environmental induction / training will be delivered to employees through the site induction, orientations and on-going training via pre-start and toolbox meetings, briefings, email notifications, etc.

All employees (including subcontractors) will receive induction / training in the following:

- Environmental Policy
- Site environmental objectives and targets
- Understanding individual authorities and responsibilities
- Environmental Risks and Controls
- Emergency procedure and response (e.g., Spill clean-up)
- Basic understanding of their legal obligations

Personnel performing tasks which can cause significant environmental impacts will be deemed competent on the basis of appropriate education, training and/or experience.

All Roberts Co operational staff on this project will be consulted on the requirements and implementation of this EMP. Initial training in the project EMP shall be undertaken within 1 month of the project commencement date. EMP training for new staff members shall be completed within 1 month of their commencement on the project.

Training in the operation and implementation of Roberts Co's Integrated Management System shall be provided for all operational staff during the company induction.

The Project HSE Manager / Advisor will establish a schedule of environmental training in conjunction with the development of this EMP. Training in high-risk aspects shall be undertaken as the project progresses. An outline of the proposed training is provided below. The training shall be scheduled to reflect the requirements of the construction program.

ASPECT	TRAINING INCLUSION	PERSONNEL REQUIRED	METHOD / FREQUENCY
Emergency Spill Response	Use and location of spill kits, spill control Emergency response procedures, drills	Operational personnel	Project Induction Pre-start / tool meetings Internal Roberts Co course run as required for site personnel
Erosion and Sediment Control	Standard erosion and sediment controls from the Landcom 'Blue Book' Implementation of controls on site Erosion and sediment control plans	Operational personnel	Project Induction Pre-start / tool meetings
Heritage and Archaeological Awareness	Stop works and reporting protocols for discovery of previously unknown heritage and archaeological items Exclusion zones / no-go areas	Operational personnel	Project Induction Pre-start / tool meetings Protocol posted on message boards
Contamination Awareness	Contamination status of site Stop works protocols for unidentified potential contamination (hydrocarbons, asbestos, etc)	Operational personnel	Project Induction Pre-start / tool meetings Process distributed to workers and posted on message boards
Environmental Legal Obligations	POEO Act and other project requirements Applicable fines and prosecutions	Operational personnel	Project Induction Pre-start / tool meetings

ASPECT	TRAINING INCLUSION	PERSONNEL REQUIRED	METHOD / FREQUENCY
Community / Stakeholder Awareness	Adjacent community and Project involvement Relevant Project stakeholders Accepted behaviours Approved hours of work	Operational personnel	Project Induction Pre-start / tool meetings

Table 09 – Environmental impacts and aspects training schedule.

11 AUDITING

11.1 Environmental Management System Audit

Auditing of the Project Environmental Management System will be carried out in accordance with Regional HSEQ Audit Schedule. The audit will evaluate compliance with this EMP and associated documentation including legal, contractual and other requirements.

The HSE Advisor / Manager, in consultation with the other managers, will decide on the frequency, scope and timing of project / workplace audits. It is expected that the project will be audited within three (3) months of commencing on site and thereafter as determined by the HSEQ Manager.

Where a client is undertaking an audit of the project which coincides with a planned internal audit by Roberts Co the client audit may, at the discretion of the HSE Advisor / Manager, negate the need for an internal audit.

An audit report will be issued to the Project Management Team for action. A follow up/close out audit will be coordinated within 1 month of the issue of the audit report. Audits shall be captured within the Roberts Co's designated electronic database. Actions associated with audits shall also be logged in the Roberts Co's designated electronic database.

11.2 Management Review

The Project Manager in consultation with the Project HSE Advisor / Manager will check the status and adequacy of the Project EMP to ensure that it meets current client and Company requirements as well as relevant environmental standards.

The Plan will be reviewed as and when required during the course of the contract when the following situations arise:

- Client recommendations for changes (particularly following initial review);
- Changes to the Company's Integrated Management System;
- Opportunities for improvement or deficiencies in the project system are identified;
- Following an audit of the system or the occurrence of significant incidents and non-conformances.

APPENDICES

Appendix 01 – Environmental Policy

roberts co

Policy and Procedure
Environmental Policy

Roberts Co is committed to reducing the impact of its operations on the environment. We acknowledge that as a service organisation we can minimise the negative impact on the environment in many ways as well as role model responsible and sustainable environmental behaviour for our people, suppliers, and the community.

The key principles and actions underpinning our policy are:

- Take environmental issues seriously at an Executive and Senior Management Level.
- Develop and support small-scale environmental improvement plans at sites wherever possible.
- Consulting with employees and suppliers to ensure that environmental impacts on sites are understood and addressed effectively.

We maintain and continuously improve an Integrated Management System that complies with the requirements of ISO 14001:2015 and all environmental legislation and other requirements which are relevant to Roberts Co.

Our environmental objectives are to:

- Minimise environmental impact on land, water, air, flora, and fauna
- Prevention of pollution, protect the environment, preserve natural resources, and conserve all heritages.

To achieve these objectives, we shall act to:

- Ensure high levels of management and staff involvement in achieving stated objectives.
- Continuously engage all stakeholders in meaningful consultation and communication.
- Use suppliers, wherever possible, who have similar environmental objectives as ourselves and give preference to environmentally friendly products and equipment.
- Always weigh the environmental benefits of a product equally with its price and safety benefits.
- Measure our performance and use this information for the continual improvement of our services and the Integrated Management System.

This policy is applicable to all employees, contractors and any person or organisation that represents the Company; as well as external providers conducting activities for and on our behalf. It expresses our ongoing commitment to understand, abide by and regularly review, consistent with the monitoring and audit schedule these key principles and actions.

Matt Bourne
Chief Executive Officer Date: 28/03/2024

Appendix 02 – ENV Plan Sign Off

I have read and understand the requirements of the role, processes, responsibilities and accountabilities as outlined within this Project Environmental Management Plan.

NAME	POSITION	DATE REVIEWED	SIGNATURE
[redacted]	Project Manager	31/5/24	
[redacted]	Senior Services Manager	31/5/24	
[redacted]	Senior Site Manager	31/5/24	
[redacted]	Site Supervisor	31/5/24	
[redacted]	Project Engineer	31/5/24	
[redacted]	Project Engineer	31/5/24	
[redacted]	Contract Administrator	31/5/24	
[redacted]	Project HSEQ Advisor	31/5/24	
[redacted]	Project Coordinator/ Cadet	31/5/24	
[redacted]	First Aider/Traffic Controller/CW	31/5/24	
[redacted]	Site Supervisor	31/5/24	

Appendix 03 – Legal and Other Requirements

The relevant legal and other requirements are outlined in the table below;

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
Environmental Planning and Assessment Act 1979		X	This Act establishes a system of environmental planning and assessment of development proposals for the State.	**High** Relevance The REF conditions and obligations are incorporated into the specification documents and RCo's EMP.
Local Government Act 1993 Local Government (General) Regulation 2005		X	The Local Government Act and Local Government (General) Regulation provide a legal framework for an environmentally responsible system of Local Government including the responsibility to administer various regulatory systems (e.g., Environmental Planning, Development Consents and Conditions of Approval).	**High** Relevance The local Council (the Local Government body for this area) has number powers to control local issues including Development Applications (other than state significant development).
Roads Act 1993 Roads (General) Regulation 2000		X	This Act and Regulation primarily provide for such things as the opening and closing of public roads, identification of road boundaries and road widening, road levels, classification of public roads, road work, protection of public road and regulation of traffic, regulation of work, structures and activities.	**Medium** Relevance This Act is mostly an administrative Act for RMS and has minor relevance to carrying out the works.
Soil Conservation Act 1938		X	This Act makes provision for the conservation of soil resources, farm water resources and the mitigation of erosion. The Act is binding on the Crown, however the Crown is not liable for prosecution. The Act provides for notification in the government gazette catchments where erosion is liable to cause degradation of rivers, lakes etc (i.e., protected land).	**Medium** Relevance This Act is mostly an administrative Act for RMS and has minor relevance to carrying out the works.
Environment Protection and Biodiversity	X		The main purpose of this Act is to provide for the protection of the environment especially those aspects that are of national environmental importance and to promote ecological sustainable	No Relevance

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
Conservation Act 1999 (Cwth)			development. The Act binds the Crown. Do not take, use, keep or interfere with "nationally significant" cultural and natural resources, protected wildlife and protected plants without Approval.	This Act is of little relevance to the contractor on this project as it has been determined not to trigger the provisions of the act.
Native Vegetation Act 2003 Native Vegetation Regulation 2013		X	This Act and Regulation provide for the conservation and management of Native Vegetation by requiring Development Consent to be obtained for the clearing of Native vegetation. Section 12 of the Native Vegetation Act 2003 excludes the clearing of land carried out in accordance with consent under Division 3 of Part 9 of the Roads Act 1993. Clearing of native vegetation required for construction of the work under the contract would be covered by such consent. The Native Vegetation Regulation 2013 allows for the development of self-assessable codes for clearing of feral species, clearing of invasive species, environmental works, thinning native vegetation, clearing of paddock trees, and clearing of mulga.	**Low** Relevance Clearing of native vegetation is not required outside of the contract.
Land and Environment Court Act 1979		X	The Land and Environment Court is constituted under this Act. The jurisdiction of the Court is divided into numerous classes. The relevant classes for the project covers matter such as the prosecution for offences under various environmental legislation and to appeal against conditions of approvals, permits or orders.	**Low** Relevance The relevance of this Act would only apply to work under the contract if RCo were prosecuted for an Environmental Offence.
Greenhouse Gas (GHG) Emissions National Greenhouse and Energy Reporting Act 2007	X		Corporations emitting more than 50kT of carbon dioxide equivalent units are required to register and report their Scope 1 and Scope 2 emissions for all Facilities in which they have Operational Control. Facilities emitting more than 25kT of carbon dioxide equivalent units must register and report Scope 1 and Scope 2 emissions.	**Low** Relevance RCo is a registered entity under this act. As such, where RCo has Operational Control, the Scope 1 and Scope 2 emissions associated with the project must be reported. This includes the collation and reporting of subcontractors site emissions. RCo does/does not have Operational Control of this facility.

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
Contaminated Land Management Act 1997		X	This Act provides for a process to investigate and remediate land that has been contaminated and presents a significant risk of harm to human health. Section 60 of the Act is a "Duty to Report Contamination". This duty applies to owners of land and persons who become aware their activities have contaminated the land.	**High** Relevance The relevance of this Act to the contractor will be in the management of contaminated materials which are eident in the Contract Documents.
Fire Control Legislation				
Rural Fires Act 1997		X	This Act is intended to prevent, mitigate and suppress bush and other fires. It places a duty on Roberts Co as the occupier of the site to extinguish fires during bush fire danger periods or if unable to do so notify appropriate firefighting authorities of the existence of the fire and its location.	**Low** Relevance This project site and surrounding areas are not prone to bush fires.
Environmentally Hazardous Chemicals Act 1985		X	This Act prohibits the manufacturing, processing, keeping, distributing, conveying, using, selling or disposing of an environmental hazardous chemical or waste (prescribed activity) except under the provisions of a chemical control or a licence. The EPA is required to prepare inventories of environmentally hazardous chemicals and declared chemical wastes.	**Low** Relevance It is not anticipated any environmentally hazardous chemicals or declared chemical waste will be used or stored on the site. The Act therefore has little relevance to the site other than being aware of the existence of registers of declared chemical wastes and environmentally hazardous chemicals.
Dangerous Goods (Road and Rail Transport) Act 2008		X	The purpose of this Act is to regulate the transport of Dangerous Goods by road and rail in order to promote public safety and protect property and the environment. The transport of Dangerous Goods is required to be appropriately licensed (both vehicle and driver). Depending on the quantities being transported, the Act outlines specific requirements for including appropriate placards on the transport vehicle, emergency procedures, PPE, manifest documentation and fire extinguishers.	**Medium** Relevance The relevance of the Act is in respect to the transport of dangerous good to & from the site. The project will require the use of a variety of dangerous goods. RCo will need to review and ensure Dangerous Goods requirements are addressed where transported by its vehicles, plant and equipment.

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
Dangerous Goods Safety Management Regulation 2001		X		
Water Management Act 2000 Water Management (General) Regulation 2004		X	This Act repeals the Rivers and Foreshores Improvement Act, 1948 and the Water Act, 1912. The provisions of both the aforesaid Acts are progressively rescinded as Water Management Plans are prepared and gazetted for catchment areas within the state. This Act and Regulation provide for the protection, conservation and ecologically sustainable development of water sources of the State and in particular to protect, enhance and restore water sources and their associated ecosystems.	No Relevance This Act has no direct relevance at this time to the construction work under this contract. The project approval does not trigger the provisions of this Act.
Dams Safety Act 1978		X	This Act constitutes the Dams Safety Committee and confers and imposes on the Committee functions relating to the safety of certain prescribed dams.	**Low** Relevance It is unlikely any action in respect to this project will endanger the safety of any prescribed dam
Coastal Protection Act 1979		X	This Act requires public authorities to notify the Coastal Council of NSW of any information, proposed activity or work that in the opinion of the public authority is relevant to the exercise of the function of the Coastal Council. It further empowers the Minister for the Department of Commerce to require public authorities to obtain consent prior to carrying out development in the coastal zone or giving consent to a person to occupy or carry out development in the coastal zone.	No Relevance The project is not located in areas associated with this act.
National Parks and Wildlife Act 1974		X	The relevance of this Act is firstly in respect to the protection and preservation of aboriginal artefacts. Discovery of material on site suspected as being of aboriginal origin must be reported and protected pending assessment and direction by the Client's Representative.	No Relevance No identified aboriginal artefacts have been identified within the construction area. The only relevance would be if new previous unknown artefacts were discovered during construction

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
			Secondly it is an offence under Part 8A of this Act to pick or harm threatened species. (Refer to the notes under the Threatened Species Conservation Act for more information)	
Threatened Species Conservation Act 1995 Threatened Species Conservation Regulation 2002 Threatened Species Conservation (Savings and Transitional) Regulation 1996		X	This Act and Regulations provide for obtaining licenses to harm or pick threatened species populations or ecological communities whether plant or animal or to damage any critical habitat. The offence of picking or harming any threatened species is covered under the National Parks & Wildlife Act Part 8A. It is a defence under Part 8A of that Act if the offence was essential to carrying out development that is in accordance with a Development Consent within the meaning of the EP&A Act or an approval within the meaning of Part 5 of the EP&A Act.	No Relevance No threatened species of flora or fauna listed in the schedules of this Act have been identified within the area of the proposed work.
Fisheries Management Act 1994		X	This Act is applicable to all waters within the state including private and public waters and all permanent and intermittent waters. The Act is most relevant in respect to maintaining water quality and ensuring no polluted water from site works enters streams, creeks and waterways. In addition this Act also has relevance for the removal of marine vegetation.	**Low** Relevance Along with the POEO Act water discharging from the site must not pollute the adjacent streams or watercourses.
Marine Pollution Act 1987		X	This Act creates offences for discharges of oil, oily mixtures and noxious liquid substances from ships into State waters.	No Relevance The site is located adjacent to state waters and may involve the use of applicable vessels.
Noxious Weeds Act 1993		X	This Act provides for the classification and control of noxious weeds. Declared noxious weeds are classified as Class 1, State Prohibited Weeds; Class 2, Regionally prohibited Weeds, Class 3 Regionally Controlled Weeds, Locally Controlled Weeds and Class 5 Restricted Plants. The characteristics of each class is given in Section 8 (2) of the Noxious Weeds Amendment Act 2005. Class 1, 2 & 5 weeds are referred to in the Act as “Notifiable Weeds”.	**Low** Relevance The Act applies to owners or occupiers of land including public authorities and thus does not apply to RCo.

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
Water Act 1912		X	This Act provides for licences to extract water for construction purposes either from surface or artesian sources. Should construction water be extracted from surface (other than sedimentation ponds) or artesian sources a licence will be required.	**Low** Relevance It is not proposed that construction water will be obtained from surface (e.g., creeks, lakes etc) or artesian sources.
Heritage Act 1977		X	This Act provides for the preservation and conservation of heritage items such as building, works, relic, places of historic interest, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance. Under this Act a relic means any deposit, object or material evidence which is 50 or more years old and relates to the settlement of the area (not being an aboriginal settlement). It is an offence under this Act to wilfully and knowingly damage or destroy items of heritage value. Do not demolish damage, move or develop around any place, building, work, relic, moveable object, precinct, or land that is the subject of an interim heritage order or listing on the State Heritage Register or heritage listing in a Local Environmental Plan without an approval from the Heritage Council (NSW) or local council.	**Medium** Relevance The 1902 tram line has been identified as a potential heritage item. An archaeologist will be required on site to supervise excavation in affected areas.
Wilderness Act 1987		X	An Act to provide for the permanent protection of and proper management of Wilderness Areas and to promote the education of the public in the appreciation, protection and management of wilderness. The Act and associated Regulations provides a mechanism for the identification and declaration of Wilderness areas.	No Relevance This project is not within or immediately adjacent to a declared Wilderness area. This Act has little or no relevance to the project.
Plantations and Re-afforestation Act 1999		X	This Act is intended to facilitate the reforestation of land and development of timber plantations. It provides codified environmental standards together with a streamlined integrated scheme for the establishment and management and harvesting of timber and other forest plantation products.	No Relevance The location of work under this contract is not located within or adjacent to reforested or plantation forest land.

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
Australian Heritage Council (Consequential & Transitional Provisions) Act 2003 Australian Heritage Council Act 2003 (Cwth)	X		The Australian Heritage Council (Consequential and Transitional Provisions) Act 2003 repealed the Australian Heritage Commission Act 1975. The Australian Heritage Council Act 2003 establishes the Australian Heritage Council. The Council is required to identify places to be included in the National Estate and to maintain a Register of the National Estate of places.	No Relevance The site is not on Register of the National Estate of places.
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cwth)	X		This Act provides for the preservation and protection from injury or desecration to areas and objects of particular significance to Aboriginals. Areas and objects can be protected by Ministerial Declaration and it is then and offence to contravene such a declaration.	No Relevance No areas or objects within the works site have been identified as being subject to such a declaration and this Act is of little relevance to the project.
Ozone Protection Act 1989		X	This Act provides for a system of controls and to regulate and prohibit the manufacture, sale, distribution, use, emission, re-cycling & disposal of stratospheric ozone depleting substances and articles that contain these substances. The impact is that appropriately qualified people in accordance with this Act must undertake all servicing and maintenance of this type of equipment.	**Low** Relevance The relevance of this Act will relate to the use of refrigerators and air conditioning units in site buildings and vehicles which still contain CFCs. Such items are unlikely to be found on site.
Protection of the Environment Operations Act 1997		X	This Act is of most relevance to work being carried out under this contract. It integrates into one Act all the controls necessary to regulate pollution and reduce degradation of the environment, provides for licensing of scheduled development work, scheduled activities and for offences and prosecution under this Act.	**High** Relevance The Act provides for the issuing of environmental protection notices to control work and activities not covered by licences. Section 148 of the Act requires a pollution incident causing or threatening material harm to the environment to be notified to the EPA and other authorities immediately.
Sydney Water Act 1994		X	This Act establishes the Sydney Water Corporation as a statutory State owned corporation. The functions of the Sydney Water	**Low** Relevance

Legal and Other Requirements	Nat.	NSW	Summary of Obligations	Relevance to the Project / Notes and System
			Corporation is to supply and store water, provide sewerage services, provide stormwater drainage and dispose of waste water within it area of operations.	Coordination may be required with Sydney Water during the works
Sydney Water Catchment Management Act 1999		X	This Act establishes the Sydney Catchment Authority as a statutory corporation representing the Crown. The role of the Sydney Catchment Authority is to manage and protect the catchment areas and catchment infrastructure works, be a bulk water supplier and to regulate activities within or affecting the catchment areas	**Low** Relevance This project will not impact on areas regulated by the Sydney Catchment Authority.
Pesticides Act 1999 Pesticides Regulation 1995		X	This Act and Regulation establish a legislative framework to regulate the use of pesticides. They have the objective to promote the protection of human health, the environment, property and trade in relation to pesticides. It is an offence under this Act and Regulation to wilfully or negligently misuse pesticides.	**Low** Relevance It is not envisaged that pesticides will be used on the project by RCo.
Waste Avoidance and Resource Recovery Act 2001		X	This Act repeals the Waste Minimisation and Management Act, 1995.The purpose of the Act is to encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecological sustainable development. The Act provides for the making of policies and strategies to achieve these ends. It is an offence under the Protection of the Environment Operations Act to wilfully or negligently dispose of waste in a manner that harms or is likely to harm the environment.	**Medium** Relevance The relevance of the Act to this project is to implement the strategies by adopting the hierarchy of avoidance; avoidance of unnecessary resource consumption; resource recovery (including reuse, reprocessing, recycling and energy recovery), disposal (as a last resort).

Appendix 04 – Operational Control Procedures – Environmental Risk Action Plans

Environmental Risk Action Plans will be developed for each environmental issue which has a risk ranking of Medium or High.

Significant environmental issues will be managed according to the Environmental Risk Action Plans below.

Noise and Vibration		
Objective	–	To comply with contractual requirements and ensure that noise and vibration from construction activities does not cause environmental nuisance
Targets	–	No valid noise / vibration complaints resulting from construction works
	–	No unreasonable noise or vibration
	–	No noise and vibration impacts on external receptors
Legal, Contractual and Other Requirements	–	See Appendix 3 for list of applicable legislative requirements
	–	Contract Specification Clause
	–	Planning consent conditions – REF Approval No. 10/2023
	–	Audible construction works unless otherwise approved by the Client shall be restricted to:
	–	7am-6pm Monday – Friday
	–	8am-1pm Saturdays
	–	No work outside of these hours without approval
	–	Construction activities that are inaudible external to the site may be undertaken outside of these hours where approved
	–	Development Consent
	–	AS2436 Guide to Noise Control on Construction, Maintenance and Demolition Sites
Site specific planning / approval conditions / licence conditions	–	Refer to section 9 of the Noise and Vibration Construction Management Plan
Controls	–	No work will be undertaken outside of the agreed hours without prior approval

Noise and Vibration	

(means and resources)	– Where work outside the hours nominated above hours is required, approval shall be gained prior to the commencement of works
	– Where construction vibration is found to be causing a disturbance to, the construction methods shall be reviewed to reduce the impact where possible
	– Site offices, compounds and sheds will be located so as to have no negative impact on the noise amenity of nearby sensitive receptors
	– Delivery operations or other noise generating activities at compound and storage areas will take place during the designated construction hours nominated above, unless specifically required by Police or RTA / VicRoads requirements
	– Where practical, substitution of excessively noise processes with alternative processes
	– Avoiding where practical the use of noisy plant simultaneously close together or adjacent to sensitive receptors
	– High efficiency mufflers must be fitted to all plant and equipment to minimise the generation of noise
	– All plant will be maintained in accordance with the manufacturer's requirements
	– Noise generating equipment to be orientated away from sensitive areas
	– Undertaking loading and unloading activities away from sensitive areas and during designated construction hours
	– Select the most appropriate plant and equipment to minimise noise generation and include where necessary screening and enclosures
	– On-site generators and auxiliary power sources used during construction should be positioned away from existing buildings to buffer noise/ vibration
	– Regular checks are to be undertaken to ensure all equipment and vehicles are in good working order and are operated correctly. Checking should include:
	  – engine covers
	  – defective silencing equipment
	  – rattling components
	  – leakages in compressed air lines
	– Awareness training and information will be provided to project personnel in relation to the vibration requirements on the project and the need to minimise vibration when in close proximity to operational areas
	– Plant, equipment and processes shall be selected so as to limit construction related vibration

Noise and Vibration	
	– Restrict or modify working hours to minimise impact if required. Include periods of respite where possible when vibration generating activities are being undertaken
Responsibilities	– The Site Manager will ensure construction activities comply with these requirements and implement the control measures – The Site Manager / Project Manager will obtain approval to work outside approved hours
Timeframe	– Duration of site works
Monitoring and Reporting	– Weekly inspections to be recorded on form HSE Inspection – Complaints to be recorded on form HSE Incident Notification Report – Daily inspection (pre-start) checks and regular servicing of equipment – Daily / weekly check sheets to be kept for engine-driven or other 'noisy' equipment

Tree Protection	
Objective	– To comply with contractual and Development Consent requirements and ensure that on-site trees are protected, where required from construction activities
Targets	– Compliance with Development Consent requirements in relation to protected trees from Local Council – No damage / death to trees marked as protected on the project – All RCo staff and subcontractors are informed of the requirements of protected trees on the project
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements – Contract specification clause – Planning consent conditions – Ref 10/2023
Site specific planning / approval conditions / licence conditions	– Refer to Arborist Report
Controls (means and resources)	– Ensure approval is provided to remove trees – Appropriately trained and qualified tree removal contractors to be used – Awareness training in the need to preserve vegetation to be retained

Tree Protection		
	–	Provide barricading or other suitable protection measures for trees to be retained
Responsibilities	–	Site Manager, Project Manager and RCo Staff to ensure all targets are met
Timeframe	–	Duration of works by RCo
Monitoring and Reporting	–	HSE Inspection & Reporting

Dust and Air Quality		
Objective	–	To comply with contractual requirements and ensure that dust and other air emissions from construction activities do not cause impacts on sensitive receivers and equipment
Targets	–	No valid dust complaints from construction works
	–	No dust impacting on offsite activities or surrounding residences
	–	No release of contaminants, (odour, smoke etc) into the air
	–	Comply with construction contract conditions
Legal, Contractual and Other Requirements	–	See Appendix 3 for list of applicable legislative requirements
	–	Contract specification
	–	Planning consent conditions – Ref 10/2023
Site specific planning / approval conditions / licence conditions	–	Air monitoring requirements are to satisfy the requirements stipulated in Section 10.9.1 of the RAP and include real-time exposure monitoring and occupational asbestos monitoring.
Controls (means and resources)	–	Spraying formations and exposed work areas to suppress dust using water carts, tankers and other suitable equipment
	–	Minimise traffic on exposed areas – create designated haul roads
	–	Cover haul vehicles loads & ensure tail gates are closed when operating on public roads
	–	Provide shaker grids or rumble strip at site egress points. Note where aggregate is used, minimum size is 150mm
	–	Remove mud from haul vehicles prior to entering public roads
	–	Remove spilt mud by construction equipment or vehicles on public roads

Dust and Air Quality	
	– Reprogram dust generating work during periods of high wind – Provide awareness training in the need to minimise dust during site inductions and toolbox talks – Regular visual monitoring of dust generation – Maintenance of Plant & Equipment as per manufacturers requirements
Responsibilities	– The Site Manager / Project Manager to implement the requirements of this plan – Site Manager to inspect the works at regular intervals to identify areas of dust generation
Timeframe	– Shaker grids to be installed prior to commencement of works (where applicable) – Water tankers and other measures available at the commencement of earthworks – Spilt mud and sediment to be removed from public roads prior to the end of each shift – Duration of site works
Monitoring and Reporting	– Weekly inspections to be recorded on Form HSE Inspection – Complaints to be recorded on form HSE Incident Notification Report

Waste	
Objective	– To comply with contractual and legislative requirements and ensure that waste from construction activities does not have the potential to escape from the site and cause an environmental nuisance / harm
Targets	– No incidents where waste is stored in a position where it has the potential to move off-site – All off site movements of waste will be tracked – The principles of the waste management hierarchy will be adopted, where practicable – Target to reuse or recycle <insert percentage target 60%> by weight of construction waste – Waste will be minimised wherever possible
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements – Contract Specification Clause – Planning consent conditions – REF 10/2023

Waste	
Site specific planning / approval conditions / licence conditions	– ACM license for removal of contaminated waste
Controls (means and resources)	– Licensed waste contractors will be utilised to remove waste – All waste is to be disposed of at a lawful facility **NOTE:** A lawful facility includes one that has the appropriate Development Consent, Environment Protection Licence or is complying with EPA approved conditions and requirements – Use a licensed contractor to remove waste from site – Waste must be classified prior to disposal – refer to either – NSW EPA Waste Classification Guidelines – VIC EPA Guide to Classifying Industrial Waste (1968) – All spoil material removed from the site will be classified as per the above-named guidelines. Only a suitable Licensed or approved facility or approved site may receive the waste – Records of the quantity and final location of the spoil material will be retained – Use skip bins and ensure there are an adequate number of bins on site to hold all waste generated – Provide bins to enable waste segregation – Provide recycling services. E.g., Paper, Concrete, Steel, Cardboard, Timber – Ensure housekeeping is maintained and waste is disposed of to the appropriate bin – Retain waste disposal permits and figures on the amount of waste that has been removed from site
Responsibilities	– Site Manager will ensure waste is correctly stored, classified, recorded, tracked and minimised at all times – The Project Manager is accountable for ensuring lawful waste disposal – All personnel are responsible for ensuring waste is placed in the bins provided
Timeframe	– Duration of site works
Monitoring and Reporting	– Skips monitored visually by the Site Supervision on a daily basis – Form HSE Inspection to be used to verify site waste practices

Waste	
	– Waste disposal records are provided by waste management provider monthly

Water Quality, Site Drainage and Erosion and Sediment Control	
Objective	– To comply with contractual and legislative requirements and ensure that water discharged off-site from construction and erosion and sediment control (ESC) activities does not cause environmental nuisance / harm
Targets	– No sediment impacts to the surrounding environment and waterways as a result of the works – Prevent water quality impacts off site as a result of erosion and sedimentation.
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements
Site specific planning / approval conditions / licence conditions	– Planning consent conditions requirements – REF 10/2023 –

Controls
(means and resources)
	– Erosion and sediment control plans (ESCPs) will be developed and implemented prior to the commencement of topsoil stripping and earthworks
	– The development of ESCPs will be guided by the Blue Book and other guidelines where required
	– Particular attention will be paid to the design criteria for sediment fences, straw bales, catch drains, diversion drains, sandbags and similar controls
	– Permanent drainage to be installed as early in the program as possible
	– All water to be discharged in accordance with legislation and only after RCo approval
	– Discharge quality must comply with:
	  – TSS: ≤ 50mg/lt (~Turbidy 30NTU). If this cannot be achieved though natural settling, then the trapped sediment laden water is to be flocculated with gypsum applied at a rate of approx. 40kg/100m3
	  – pH: Between 6.5 and 8.5
	– Provide shaker grids or rumble strip at site egress points. Note where aggregate is used, minimum size is 150mm
	– Top-soil / mulch stockpiles to be not greater than 2.0m in height. All stockpiles will be located clear of watercourses and drainage works

Water Quality, Site Drainage and Erosion and Sediment Control	
	– Wastewater management facilities shall only be provided through connection to existing sewer or proprietary storage and pump out systems are permitted – Wastewater storage and pump out systems shall be procured, installed and operated, including the provision of automatic cut off valves for inflows and high level alarms – All disturbed surfaces will be revegetated within 1 month of final land forming and in compliance with the landscaping plans – ESC devices are to be maintained when their capacity has been reduced by 25% – Under no circumstances will temporary stockpiles be placed within 5m of the site boundary or in position where it could impact adjacent property – Toolbox talks will be conducted for employees and subcontractors on the requirements of the ESC Plan – The ESC Plan is to be maintained and up to date for the current site conditions – Use sandbag check dams to protect stormwater drains as required – All ESC works will be removed immediately prior to final completion and all surfaces will be returned to pre-existing condition
Responsibilities	– All staff to ensure adequate ESC devices are installed and maintained – The PER will undertake “at least weekly” inspections of on-site ESC devices, plus prior to expected rainfall and after rainfall – The Site Manager is responsible for the repair / management of any damage or additional ESC devices, as required
Timeframe	– Duration of site works
Monitoring and Reporting	– Visually monitored daily by site supervision – Weekly inspections to be documented on form HSE Inspection – Maintenance activities for ESCPs shall be documented – items that cannot be immediately repaired are to be documented on the project CAR Register – All water quality data including quantity, quality and dates of water release will be maintained the project records

Traffic Management	
Objective	– To comply with contractual requirements and ensure that noise and additional traffic from construction activities does not cause an environmental nuisance
Targets	– No valid complaints resulting from congestion from construction traffic outside the approved Traffic Management Plan (TMP) – Comply with traffic management standards – No visible cueing in streets surrounding the site
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements – Planning consent conditions – REF 10/2023
Site specific planning / approval conditions / licence conditions	– Construction Traffic Management Plan (CTMP) to be developed and approved

Controls (means and resources)	– A TMP shall be developed detailing the route to the site, times of activity, types of machinery, signage, traffic control measures, etc
	– An approved Traffic Control Plan is required for any activity on/or immediately adjacent to public roads
	– The TMP will detail the monitoring and inspection requirements
	– There will be no cueing of vehicles on any roads adjacent to or in the vicinity of the site
	– There will be no construction parking in non-approved zones or parking areas
	– Ensure pedestrian access ways are clearly defined and maintained
	– Regular checks are to be undertaken to ensure all equipment and vehicles are in good working order and are operated correctly. Checking should include:
	  – defective silencing equipment
	  – rattling components

Responsibilities	– The Site Manager is responsible for ensuring traffic management plans and TCPs are developed, approved and implemented
Timeframe	– Duration of site works

Traffic Management	
Monitoring and Reporting	– HSE Incident Notification Report to be used to document complaints – Daily inspection, checks and regular maintenance to be completed for traffic control measures

Hazardous / Contaminated Material	
Objective	– To comply with contractual and legislative requirements and ensure that hazardous / contaminated material from construction activities does not cause an environmental nuisance / harm and is disposed of in accordance with legislative requirements
Targets	– No environmental incidences involving contaminated/ hazardous materials – No pollution events of the surrounding environmental and water ways by contaminated material – All off-site movement of any found contaminated material will be tracked
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements – Contract specification clause – AS/ NZS 1940: 2004 - The Storage and Handling of Flammable and Combustible Liquids – Australian Dangerous Goods Code, 5th Edition
Site specific planning / approval conditions / licence conditions	– 46.1 Hazardous and / or intractable wastes arising from the remediation work shall be removed and disposed of in accordance with the requirements of NSW EPA, SafeWork NSW and the relevant regulations by the Contractor. In particular, any hazardous wastes will be transported by a NSW EPA licensed transporter. – 46.2 Recommendations and all asbestos handling shall be carried out consistent with the recommendations of the Hazardous Building Materials Survey (HBMS) prepared by JBS&G and dated 16 September 2022. – 46.3 An Asbestos Management Plan is to be prepared to provide a procedure to control the risk of exposure from asbestos and lead impacted topsoil during the work.
Controls (means and resources)	Suspected material may include that which is visibly different to surrounding material, fibrous in nature, exhibits hydrocarbon odours or other unexpected characteristics, unknown containers, piping, underground storage tanks, or similar structures are discovered: – Follow protocols in the contract, RAP or Client Environmental Management Plan – Immediately cease work and contact the Site Manger / Senior/Site Supervisor

Hazardous / Contaminated Material	
	– Demarcate the 'unexpected find' to prevent access and install appropriate environmental and safety controls – Project Manager to contact the client representative – If substance is assessed as not presenting an unacceptable risk to human health. Site Manger / Senior/ Site Supervisor to remove controls and continue work In addition, the following controls will be incorporated: – Manage any contaminated material as per legislative / EPA requirements including the testing and assessment at the direction of the Client's representative – Protect the environment by implementing control measures to divert surface runoff away from the potentially contaminated ground – Capture and manage any surface runoff contaminated by exposure to contaminated ground – Environmental awareness training relating to the identification and management of acid sulphate soils to be provided to all site personnel involved in earthworks, excavation or drainage construction activities – The Client's Representative shall be notified upon discovery of suspected ASS or PASS – Implementation of a specific runoff control plan to prevent acid runoff from contaminating site areas and watercourses – Suspected ASS / PASS stockpiles to be covered with plastic overnight
Responsibilities	– Site Manger / Senior/ Site Supervisors, Project Manager and RCo Staff to ensure all targets are met
Timeframe	– Contaminated Material: Duration of any contaminated material removal – Hazardous Material: Duration of site works
Monitoring and Reporting	– Receipts for the disposal of any found hazardous material will be filed on site by the Project HSE Advisor / Manager – The finding of any contaminated material on site will be reported monthly by the Project HSE Advisor / Manager using the Monthly HSE Report form

Concrete Washout	
Objective	– To comply with contractual and legislative requirements in relation to the washing out of concrete on the project

Concrete Washout	
Targets	– Nil spills or uncontrolled release of concrete – No instances of uncontrolled concrete washout
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements
Controls (means and resources)	– Concrete washout to be constructed with geo-fabric lining and bunded – Location of washout to be at least 20m away from any drainage line or stormwater system – Washout to be constructed to the dimensions of 6m x 3m x .5m deep prior to commencement of concrete works – Washout to be barricaded off on all sides when not in use to prevent unauthorised entry – Washout area is to be inspected daily by the Site Manager to ensure residual water levels don't exceed 75% of capacity – Daily inspection of concrete washout to be undertaken, report and rectify issues using site diary or other means – Washout area to be cleaned when the capacity has been reduced below 50% – Cleaning of washout to involve, removal of spoiled geo-fabric material and disposed of in licensed landfill. Records to be retained – Where possible waste concrete shall be returned to the batch plant or concrete recycler – Concrete truck drivers are to be advised of the location of the washout area prior to arrival on site – The requirements relating to concrete washout on site are to be provided to the supplier prior to the works
Responsibilities	– The Site Manager will ensure that an approved and prepared area for concrete washout is available – All personnel are required to ensure that the requirements of this ERAP are implemented for their operations – Site Manager / Project Manager are required to advise Roberts Co of any concrete spills – The Site Manager is responsible for confirming these requirements with the concrete supplier prior to the works
Timeframe	– Duration of site works
Monitoring and Reporting	– Weekly inspections to be recorded on Form HSE Inspection – Incidents or spills of concrete to be recorded on form HSE Incident Notification

Delivery and Storage of Chemicals, Fuels & Oils and including Dangerous Goods requirements	
Objective	– To comply with contractual and legislative requirements in relations to the transport of dangerous goods – To comply with contractual and legislative requirements in relation to the storage of chemicals, fuels and oils on the site – To ensure contractual and legislative requirements in relation to hazardous substances and dangerous goods are adequately addressed for all operations – there are specific additional requirements relating to the storage and transport of dangerous goods
Targets	– Zero spills or uncontrolled release of fuel, oils or chemicals associated with Roberts Co's Operations, (inclusive of refuelling) – Compliance with relevant transport and storage requirements – All vehicles transporting dangerous goods have appropriate placards, licenses and emergency equipment and procedures
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements – Contract specification – AS/NZS 1940: 2004 – The Storage and Handling of Flammable and Combustible Liquids
Controls (means and resources)	The following are the minimum general control measures to be implemented on the project, however additional control measures may be required following the completion of the construction process procedure/work method statement for the proposed activity: – Minimise storage of fuel, oil, chemicals or other dangerous goods on site, though efficient and timely ordering – The SDS and material risk assessment and including any specific control measures are to be submitted where required to the Client's Representative for each and every substance to be brought on to site – A risk assessment relating to the use of these materials is to be completed in accordance with the Work Health and Safety Plan prior to the arrival of these goods to site – SDS and associated documentation for each material to be reviewed prior to the completion of the risk assessment for the relevant construction process. A copy to be included with the SWMS – Ensure SDSs are available on site for all fuels, oils, chemicals and dangerous goods. Suppliers are to provide SDS prior to dispatch of the material – Chemicals, fuels and oils to be stored in a securely bunded area with appropriate signage, at all times when not specifically in use

Delivery and Storage of Chemicals, Fuels & Oils and including Dangerous Goods requirements

– Chemicals fuels, oils and chemicals to be stored inside impervious bunds of sufficient capacity to contain 110% of the stored volume. Bunded areas must have sufficient cover to prevent ingress of rain
– Materials removed from the bunded storage area for use are to be returned to the bund at the end of each shift
– Storage sites are to be > 20m away from operational facilities, drainage lines, areas prone to flooding or on slopes > 1V:10H
– Operator, driver or Supervisor to be in attendance at all times when unloading of fuel, oil or chemicals takes place on site
– No water to be discharged from bunded areas into site drainage system. Contaminated water to be removed by appropriately licensed contractor & discharged to a suitably licensed waste facility
– Delivery drivers are to be provided with specific drop off and storage instructions
– Spill kits & absorbent material to be located adjacent to storage bunds
– Training is to be provided to RCo personnel in the application of this ERAP and the use of spill kits
– Absorbent material used to clean up spills to be disposed of in accordance with either:
  – NSW EPA Waste Classification Guidelines (2014)
  – VIC EPA Guide to Classifying Industrial Waste (1968)
– A register of Chemicals, Fuels / Oils and Hazardous materials is to be kept onsite and maintained for the duration of the project
– Each construction method statement shall identify the use of chemicals, fuels & oils and hazardous materials
– SWMSs to address the specific requirements relevant to the work to be undertaken and document relevant site control measures
– Dangerous Goods
– Ensure transporters of these materials are appropriately licensed. This includes relevant licenses for vehicles and drivers
– Dangerous goods that are to be transported in receptacles greater than 500lt/kg may require specific licenses and shall not be transported by RCo without the Project Manager / Workplace Manager's approval
– Where dangerous goods are transported by RCo, a SWMS must be developed and include dangerous goods requirements
– Transport information / manifest is required to be included with any quantity of Dangerous Goods transported by RCo – Form 1232 Dangerous Goods Transport Note is to be used unless it can be demonstrated that the activity is exempt.

Delivery and Storage of Chemicals, Fuels & Oils and including Dangerous Goods requirements

- The SWMS must address the requirement for Licensing, Placards or other specific regulatory requirements
- Transport activities in quantities that trigger the requirements of a "Placard Load" under the regulations require the following:
  - Transport vehicle to have appropriate Dangerous Goods Placard
  - Transport documents including manifests
  - Emergency procedures and information in an appropriate holder
  - 30B fire extinguisher
  - Double-sided reflectors
  - Driver safety equipment and PPE
  - Goods must be secured and where required segregated from incompatible goods.
  - Dangerous goods must be appropriately marked in accordance with the Australian Dangerous Goods Code

Typical dangerous goods associated with operations include the following:

Type of Goods	DG Class
LPG Gas	2.1
Open Gear Lubricant	2.1
Marker Paint	2.1
Silicone Lubricant	2.1
Fuel Gas for welding/cutting	2.1
Fuel Gas for welding/cutting	2.2
Air Operated Tool Lubrication	3
Zinc Primer Paint	3
Air tool lubricant - workshop	3
Petrol-Unleaded	3
Sealant	3

Type of Goods	DG Class
Epoxy paint incl. hardener	8
Chemical Anchor-parts A&B	8
Chemical Anchor	8
Chemical Anchor	8
Adhesive Mortar	8
Acid	8
Degreaser (Pile Rigs)	9
Engine Coolant	9
Antifreeze	9
Grout	9
Form Oil	9

Type of Goods	DG Class
Plumbing adhesive	3
Diesel	3
Joint/gap sealant	3
Dry Film Lubricating Paint	3
Joint/gap sealant	5.2
Sealant	6.1
Flocculant	8
Rail Welding Consumables	1.4 S
Adhesive	3

Delivery and Storage of Chemicals, Fuels & Oils and including Dangerous Goods requirements	
	Dangerous Goods Storage – Dangerous goods storage on site must comply with the requirements of AS 1940:2004 including maintaining separation distances for incompatible materials – The proposed materials need to be assessed for compatibility and required separation distances or control measures implemented – Flammable materials storage is to be >15m from site facilities, officers, amenities or protected places – Quantities to be stored must be assessed to determine if they are considered manifest quantities - manifest quantities will require notification to relevant / applicable WorkCover authority – A storage location plan is required and needs to include internal layout, location of registers / manifests for the storage location – Bunding to be impervious and of sufficient capacity to contain 110% of the stored volume – Appropriate spill containment material and fire extinguishers are also required
Responsibilities	– Engineering personnel are responsible for identification of requirement to transport Dangerous Goods – Relevant Project Manager or Site Manager is responsible for ensuring all vehicles carry appropriate placards, licenses, emergency equipment and procedures – The Site Manager is required to ensure that sufficient bunds are available, and that material is stored appropriately – Engineering personnel are responsible for ensure SDS and other relevant documentation are obtained and where required submitted to the Client's Representative prior to the material arriving on site. Relevant documentation also includes appropriate risk assessment – The Project HSEQ Advisor / Manager is responsible for ensuring the Chemicals, Fuels / Oils & Hazardous Substances register is maintained
Timeframe	– Duration of operations – The requirements apply to goods transported by RCo and third parties
Monitoring and Reporting	– Plant / project risk assessments – Weekly inspections to be recorded on Form HSE Inspection – Register of Chemicals, Fuels / Oils and Hazardous Materials

Delivery and Storage of Chemicals, Fuels & Oils and including Dangerous Goods requirements	
	– Incidents or spills to be recorded on form HSE Incident Notification – Storage areas are to be inspected by the supervisory personnel on a weekly basis.

Flora and Fauna	
Objective	– To comply with contractual and legislative requirements and ensure that native fauna and flora are protected from construction activities.
Targets	– No death or injury to fauna including the Green and Golden Bell Frog – No unapproved destruction of flora
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements
Site specific planning / approval conditions / licence conditions	– As per arborist report.
Controls (means and resources)	– If native fauna is identified within the disturbance footprint, the person taking the action must take all necessary steps to minimise harm and mortality to those animals – Open excavations and storage areas to be inspected regularly for the presence of fauna species – No clearing or vegetation removal to occur without the Client's approval – All vegetation to be retained shall be protected – Works will only be undertaken in designated areas – The clearing limits and protected vegetation, is to be clearly communicated to site personnel during site inductions and toolbox talks – Plant and equipment brought on to site must be cleaned and free of deleterious material, mud and other material that may harbour weed seeds – Identification of noxious weeds is to be notified to the Client's representative for action – Construction plant, equipment and materials are not to be stored within the dripline of any trees or vegetation to be retained

Flora and Fauna	
	– No personnel on site are permitted to hunt, fish, feed, capture, extract, or otherwise disturb aquatic, animal, or vegetative species while performing any tasks in performance of the work
Responsibilities	– All personnel are responsible for ensuring that the clearing limits, are addressed and native flora and fauna species are protected – All site personnel to undertake toolbox talks in relation to the reporting process for injury / death to fauna or clearing of flora occurring beyond the required limits for construction
Timeframe	– Duration of the works
Monitoring and Reporting	– Visually monitored daily – Weekly environmental inspection form HSE Inspection detailing any flora and fauna

Archaeology / Heritage	
Objective	– To comply with contractual and legislative requirements and ensure that existing and undiscovered heritage and archaeological items are protected from construction activities.
Targets	– Heritage Act 1977 – National Parks and Wildlife Act 1974
Legal, Contractual and Other Requirements	– See Appendix 3 for list of applicable legislative requirements – No disturbance or damage to existing known heritage sites or items. – Unknown or undocumented heritage sites are not knowingly destroyed, defaced or damaged. – Identify and protect any new artefacts or heritage sites before any harm can take place. – Any relics found on site will be kept safe for consideration of incorporation into site fixtures
Site specific planning / approval conditions / licence conditions	– Refer to heritage impact statement; specifically requirement for an archaeologist to witness excavation near the 1902 tram line.

Archaeology / Heritage	

Controls
(means and resources)
	– Awareness training on the need for the preservation of artefacts and items of heritage value to be provided during the site induction
	– Location of currently identified archaeological and heritage items are to be nominated on the ECP
	– Exclusion fencing will be provided around the perimeter of any identified heritage or archaeological items
	– Awareness training on the need to stop work and to report on new sites, artefacts or items of heritage value
	– Should any new items be discovered that are suspected of being of heritage significance, whether Indigenous or European, work in the specific area would cease and RCo is to be notified immediately
	– Should suspected heritage or archaeological items including human remains be found during the works, the following procedure will apply:
	  – Work is to cease in the area immediately and RCo notified
	  – The matter is to be referred to the client
	  – The object is to be left in place
	  – GPS coordinates of the item are to be noted
	  – Photographic records of the item and its location are to be made

Responsibilities	– All personnel on site are to ensure that archaeological and heritage items are protected from damage or disturbance, unless – The Environmental Manager will ensure all site personnel undertake toolbox talks in relation to protection of nominated items that were previously unknown.
Timeframe	– Throughout construction activities
Monitoring and Reporting	– Visual monitoring weekly of any existing items – Completion of weekly environmental inspection report HSE Inspection

Appendix 05 – Environmental Control Plan

Environmental Controls Map.pdf

"PR-NSW-IMHC - General\07.0 Authorities\02 Department of Planning\REF 10.2023\REF Documents\Compiled ALL DOCS\Environmental Controls Map.pdf"

SA-20-FR-04 Asbestos Removal Control Plan-855. Rev05.pdf

"PR-NSW-IMHC - General\18.0 Safety\16 Asbestos\Management Plans\SA-20-FR-04 Asbestos Removal Control Plan-855. Rev05.pdf"

Appendix 06 – Emergency Preparedness and Response

The types of environmental emergencies that could occur on this site are tabulated below.

Note: This plan is designed to supplement both the Roberts Co Project Emergency Response Plan and the Client's site emergency response plan/s, where available.

Emergency	Preparation	Response	Responsibility
Significant adverse dust event due to weather conditions: High winds	Monitor meteorological conditions for the area - develop contingency for wind speeds in excess of 16m/s (55km/hr). High wind 'stop works' protocols in place. Establish contingency strategy for additional dust control measures, additional water carts, dust suppressants, stockpile covers etc.	Dust generating activities will cease under direction of the Project HSE Manager or Senior/ Site Supervisor until adverse conditions subside. Deploy additional mitigation measures to exposed areas stockpiles and other dust generating items will be water sprayed or covered.	Project HSE Advisor / Manager Senior/ Site Supervisor
Discovery of friable asbestos	Review previous land uses, environmental reports for potential for friable asbestos.	Quarantine suspected area. Cover or provide dust mitigation strategy.	Project Manager

Emergency	Preparation	Response	Responsibility
	Include asbestos awareness in the site induction where the potential exists. Include contingency in relevant work procedures and SWMSs. Identify potential service providers for asbestos control and removal.	Engage licensed/approved removal and disposal organisation Complete post removal verification.	Site Manger / Senior/ Site Supervisor Project HSE Advisor / Manager
Flooding	Monitor meteorological conditions – develop contingency strategy for rainfall > 100mm in 24hours or potential for > 1in 5 ARI All chemicals, fuels and other hazardous substances to be in secured containers and stored within a sealable shipping container Remove plant and equipment from low lying areas Secure plant that cannot be removed Review site drainage flow paths: Redirect site drainage to prevent flooding of residential/business premises. Ensure site drainage does not concentrate surface flow. Review and address the potential for excess water entering the site. Review and maintain erosion and sedimentation controls.	Recover materials washed from site including sediment and other waste. Check effectiveness of erosion and sedimentation devices and other flood controls, maintain where required and safe to do so.	Site Manger / Senior/ Site Supervisor Project HSE Advisor / Manager
Temporary erosion and sediment controls	Plan controls to be suitable for expected conditions.	A review of the site to be undertaken by HSEQ Advisor / Manager and Site Manger / Senior/ Site Supervisor.	Project HSE Advisor / Manager

Emergency	Preparation	Response	Responsibility
are damaged during rainfall.	Ensure sufficient materials, labour and plant are available for additional controls.	Controls to be repaired or replaced within 24 hours of detection, immediately if inclement weather current.	Site Manger / Senior/ Site Supervisor
Damage to sediment basin	Check basins for suitability to project requirements; size, treatment type, etc. Basin outlet to be designed to remain functional in 1 in 20 ARI event. Ensure basin construction is in accordance with QA requirements including relevant ITPs.	Water in damaged basin to be pumped to another secure basin or discharged if it meets the site criteria. Damage to be repaired as soon as practical. Repairs to be monitored when basin brought back online.	Project HSE Advisor / Manager Site Manger / Senior/ Site Supervisor
Spill of hazardous or toxic substance. (< 20L)	Awareness training of appropriate response and procedures to be incorporated into Project Induction. SDS on site for all materials and kept up to date. Adequate supply of absorbent materials available in the site compound and on vehicles at work location.	Report spills immediately to Site Manager and/or the Project HSEQ Advisor / Manager. Attempts to be made to limit or contain the spill using sandbags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in containers, use of geotextile or silt fencing to contain the spill. Site Manager and Supervisors to coordinate the response, clean up and disposal of the material. Material to be disposed of in accordance with the manufacturers' recommendations and applicable legislation.	Site Manger / Senior/ Site Supervisor Project HSE Advisor / Manager
Major spill of hazardous or toxic substance off site or to environmentally sensitive area.	Awareness training of appropriate response and procedures to be incorporated into Environmental and Safety Induction. SDS on site for all materials and kept up to date.	Report spill immediately to Project Manager and/or Site Manager who will notify the client. Attempts to be made to limit or contain the spill using sandbags to construct a bund wall, use of absorbent material, temporary sealing of cracks or leaks in	Project Manager Site Manger / Senior/ Site Supervisor

Emergency	Preparation	Response	Responsibility
(> 20L)	Adequate supply of absorbent materials available in the site compound and on vehicles in work location. Emergency telephone numbers for Emergency Response organisations/fire brigade prominently displayed around office and issued to supervisors. Initial contact to be made with relevant organisations at project commencement.	containers, use of geotextile or silt fencing to contain the spill, transferring remaining material. Implement procedures to notify the relevant authorities. Site Manager to coordinate the response, clean up. Fire brigade or emergency organisations should be called if spill cannot be controlled by site resources. Evacuation procedures are to be implemented to remove non-essential personnel from the affected area. On site client personnel are informed of the incident, internal reporting as per potential Class 1 matter. Access and egress to the area is established to ensure the appropriate vehicles have effective access and congestion is minimised. Senior Officer from fire brigade / emergency organisation assumes control of the operation with Roberts Co personnel assisting as required. Commence data gathering and investigation once emergency is contained.	Project HSE Advisor / Manager
Vibration causing structural damage.	Choose correct plant when working near structures; minimise size and impact . Use safe working distances during planning phase. Implement vibration monitoring at commencement of vibration generating works to ensure compliance with standards.	Activities causing vibration would cease under direction of the Project HSEQ Advisor / Manager or Site Manger / Senior/ Site Supervisor. Any occupants of buildings may be evacuated with due consideration to safety, and the area secured to prevent unauthorised access. A structural assessment to be undertaken; and if any damage is associated with construction, rectification work would be agreed.	Project HSE Advisor / Manager Project Manager

Emergency	Preparation	Response	Responsibility
Unapproved clearing / damage to protected vegetation – threatened / endangered species.	Clearly demarcate site boundaries. Clearly demarcate clearing areas and brief site personnel. Identify/mark vegetation to be retained or that is protected. Identify species that may be impacted, include material within the project induction. Included requirements within construction planning documentation.	Immediately cease activities. Engage consultant to assess damage to vegetation and presence of any endangered or threatened communities.	Site Manger / Senior/ Site Supervisor Project HSE Advisor / Manager
Injury/death to protected / endangered / threatened fauna.	Identify potentially impacted species prior to commencement on site. Identify species that may be impacted, include material within the project induction. Review/inspect vegetation to be cleared prior to clearing – utilise ecologist/spotter where there is the potential for endangered/threatened species Engage with local vet/WIRES representative on the appropriate contact/procedure. Site procedure for the short-term management of injured fauna.	Immediately cease activities upon discovery of injured fauna. Implement procedure for short-term stabilisation and transport to Vet or WIRES. Undertake additional vegetation inspection to identify any remaining fauna prior to recommencement.	Site Manger / Senior/ Site Supervisor Project HSE Advisor / Manager
Damage / destruction of indigenous heritage item.	Ensure site investigations detail any heritage items on or in proximity to the site. Include awareness material within the project induction.	Cease works and stabilise the area, under the direction of the Environmental Manager or Site Manger / Senior/ Site Supervisor. The Environmental Manager is to report the remnants to the client and regulatory authority.	Project HSE Advisor / Manager

Emergency	Preparation	Response	Responsibility
	Develop a 'stop works' protocol for any heritage find on site.	Request an archaeologist to assess the significance and archaeological potential of the uncovered feature.	
Damage / destruction of European heritage.	Ensure site investigations detail any heritage items on or in proximity to the site. Develop a 'stop works' protocol for any heritage find on site.	Cease works and stabilise the area, under the direction of the Environmental Manager or Site Manger / Senior/ Site Supervisor. Contact an archaeologist to assess the significance and archaeological potential of the uncovered feature.	Project HSE Advisor / Manager

Appendix 07 – Conditions of Approval Compliance Tracking Matrix

230526 - Response to REF SSDA Responsibility Matrix.xlsx

230822 - Response to REF SSDA Responsibility Tracking Register .xlsx

"PR-NSW-IMHC - General\07.0 Authorities\02 Department of Planning\REF 10.2023\230822 - Response to REF SSDA Responsibility Tracking Register .xlsx"