



7 November 2011

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Director-General

The Director-General
Department of Planning and Infrastructure
PO Box 39
SYDNEY NSW 2001

Attention: Michael Young

Dear Michael

**PACIFIC HIGHWAY UPGRADE – KEMPSEY TO EUNGAI PROJECT – OPERATION
ENVIRONMENTAL MANAGEMENT PLAN MODIFICATION.**

The Roads and Maritime Services (RMS) are requesting a modification to the conditions of approval for the Kempsey to Eungai project to allow for project-specific operational environmental management practices and procedures to be incorporated into existing environmental management systems.

Condition 6.6 of the Project Approval outlines the requirements for the preparation of an Operation Environmental Management Plan. The requirements involve the preparation of a plan detailing the description of activities, statutory and other obligations, monitoring of environmental performance during operation, roles and responsibilities and complaints handling.

It is noted that for recent Pacific Highway Upgrade project approvals, eg Tintenbar to Ewingsdale (07_0051) and Warrell Creek to Urunga (07_0112), a streamlined approval process for operational environmental management was allowed by incorporating the project into existing environmental management systems.

It is requested that a similar condition be adopted for the Kempsey to Eungai project. Such a modification would assist not only the RMS and its contractors but also the regulatory agencies. The Kempsey to Eungai project is staged in accordance with Condition 1.4 of the Project Approval. Stage one involves the construction of the Kempsey bypass section of the project from South Kempsey to Frederickton. Stage two involves the construction of the northern section of the approved project from Frederickton to Eungai. By adopting a similar condition to the one provided in recent project approvals, the workload associated with the preparation and assessment of multiple Operation Environmental Management Plans would be reduced, in addition to unnecessary duplication of documentation.

Roads & Maritime Services

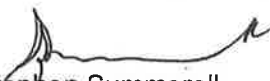
The RMS's Road and Fleet Services (RFS) are responsible for the maintenance services under an existing Environmental Management System (EMS) prepared in accordance with ISO 14001:2004. The RFS specific EMS has been developed to be consistent with the broad environmental objectives and policies set out in the RMS Corporate EMS. Road and Fleet Services are committed to managing its impacts on the environment and undertaking its activities so as to avoid, minimise or mitigate environmental impacts. As such, the incorporation of project-specific operational environmental management practices and procedures into existing environmental management systems are considered appropriate.

Condition 6.6c specifically details how the environmental performance of the operation of the project would be monitored. Condition 6.6c (i) is addressed through the Ecological Monitoring Program required under Condition 3.1 with (ii) and (iii) included in the existing EMS. Should measures not be included in the existing EMS, measures would be incorporated prior to the operation of the project.

Overall, it is considered that this modification would result in consistent management measures being able to be applied to the Kempsey to Eungai project and allow for streamlining of the regulatory approval process associated with the preparation of an Operation Environmental Management Plan. This modification is considered consistent with current best practice management and would not result in a decrease in the environmental performance of the Kempsey to Eungai project.

Please do not hesitate to contact Andrew Cook (02 6560 2508) should you require any additional information or require clarification on any of the above.

Yours sincerely



Stephen Summerell
Acting General Manager, Pacific Highway

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