



Director General
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Michael Young

**PACIFIC HIGHWAY UPGRADE, BANORA POINT: REQUEST FOR MODIFICATION TO
MINISTERS CONDITION OF APPROVAL 6.5 – OPERATIONAL ENVIRONMENTAL
MANAGEMENT PLAN AND NOTIFICATION OF COMMENCEMENT OF OPERATION**

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

Ministers Condition of Approval (MCoA) 6.5 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 Banora Point upgrade project. Such a modification would assist not only RMS and its contractors but also the regulatory agencies. By adopting a similar condition to the one provided in recent project approvals, the workload associated with the preparation and assessment of Operation Environmental Management Plans would be reduced, in addition to unnecessary duplication of documentation and management processes.

Please find attached modification document that outlines all operational management measures for the project and where these issues are addressed within existing plans or management systems. Where operational requirements are not included within existing approved plans for the project, the specific management requirements are outlined within this modification proposal report. Also attached are details of correspondence with the Environmental Review Group.

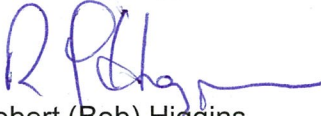
Overall, it is considered that this modification would result in consistent management measures being able to be applied to the Banora Point upgrade project and allow for streamlining of the

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 Banora Point upgrade project.

Finally, in accordance with the Compliance Tracking Program approved by the Department on 14th May 2010, RMS would like to advise the Department of the commencement of full operations of the Banora Point upgrade in September 2012.

Should you require further information, please contact RMS' Senior Project Manager, Strategic Projects Mr Peter Borrelli on 0407 254 363 in the first instance.

Yours sincerely,



Robert (Bob) Higgins
General Manager Pacific Highway

22/8/12