LENDLEASE BUILDING PTY LTD | 97 000 098 162

VICTORIA CROSS ISD

PROJECT EHS MANAGEMENT PLAN

24/06/2019 | Plan Revision No: 4.1

Plan Revision Status				
Date	Revision (in numbers)	Purpose and Summary of Amendments	Reviewed by	Approved by
27/10/17	3.1	Updated Environment legislation for VIC Appendix 2 and updated Objectives & Targets to FY18 Appendix 3	Ross Trethewy	Ross Trethewy
16/07/18	4.0	New Plan issued for use	Naomi Maughan	Ross Trethewy
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Project Revision Status				
Date	Project revision (in numbers)	Purpose and Summary of Amendments	Reviewed by	Approved by
01/02/20	1.0	New Plan	James Kennelly	Brooke Brittan
01/06/20	2.0	Integration of CEMP requirements	Jason Ambler	
24/07/20	2.1	Further CEMP Integration	Jason Ambler	

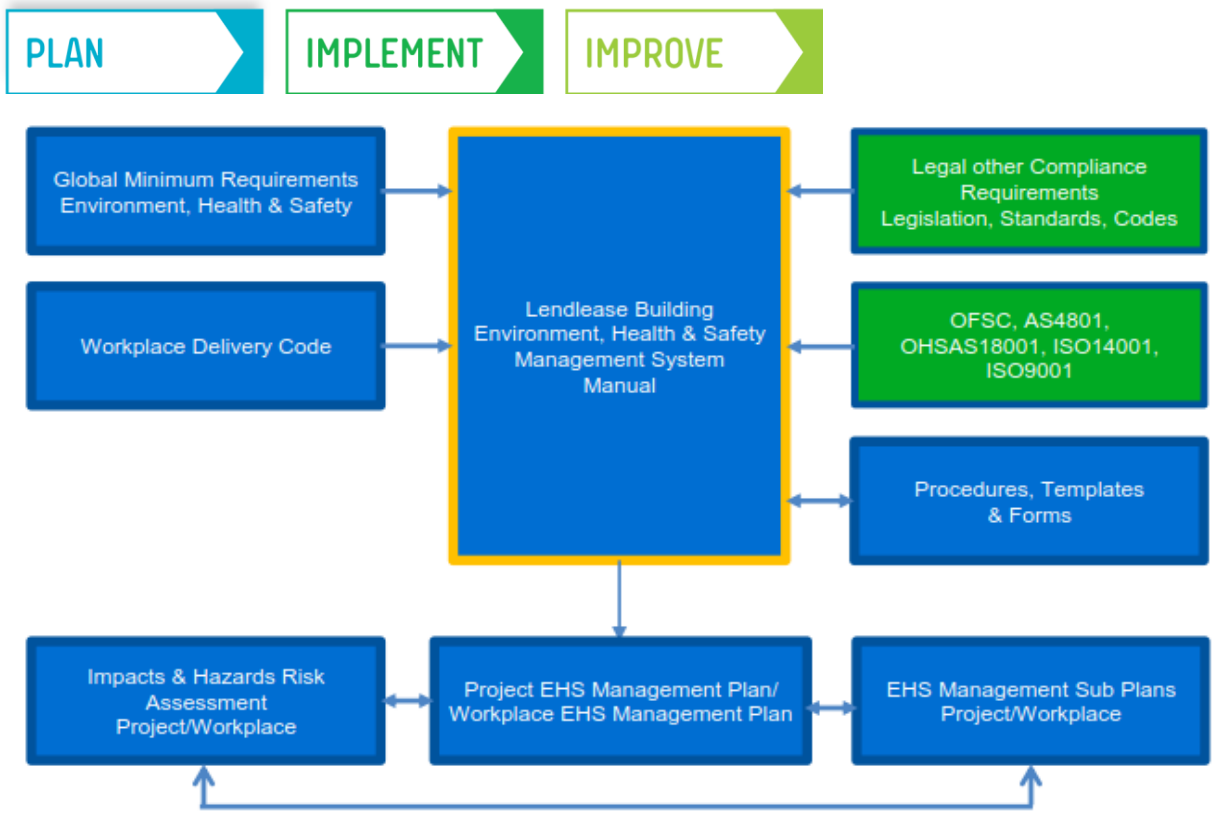
*Note that all printed paper/hard copies of this document remain uncontrolled. The controlled copy of this document is found either in Project Web, within the Project Management Plan section, or other project specific database/server approved by the Regional EHS Manager / EHS Manager Integrated Project.

WELCOME

Welcome to the project/workplace Environment, Health & Safety Management Plan for Lendlease Building Australia.

This plan forms an integral part of the Lendlease Building Environment, Health and Safety Management System shown below.

Environment, Health and Safety (EHS) is our number one priority. Importantly, this Plan has been tailored for your project, addressing its specific requirements. It follows a simple and intuitive navigation trail, outlined below to help guide you through the document.



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1.0 INTRODUCTION

1.1 PROJECT ENVIRONMENT, HEALTH & SAFETY MANAGEMENT PLAN

Lendlease Building (LLB) Australia, (incorporating Lendlease Building Pty Limited and Lendlease Building Contractors Pty Limited) operates an integrated management system where the functions and requirements of environment management and work health and safety (WHS) /occupational health and safety (OHS) /occupational safety and health (OSH) management are integrated. The LLB Environment, Health & Safety Management System (EHS MS) Manual and related procedures, forms and templates is contained within the Lendlease Building Management System, Source.

The LLB EHS MS Manual provides the overall framework for EHS management at LLB workplaces including construction projects. All projects must develop a Project Environment Health & Safety (EHS) Management Plan (MP), which outlines the management practices for the key risks affecting EHS for a project. Management of EHS at this workplace consists of the LLB EHS MS Manual together with this Project EHS Management Plan and its relevant EHS Sub Plans, procedures, codes and other supporting documents. These all form part of the LLB EHS MS and together hold certification to Australian and international standards for both health and safety and the environment and accreditation with Federal and State authorities. The structure of the EHS MS framework is outlined on Page 3.

1.2 REVISIONS AND AMENDMENTS

The revision history of the project EHS MP for LLB construction operations is documented by the LLB Document Control Register within Source. This project EHS MP template is the document used to prepare a project specific EHS management plan for each LLB construction related workplace.

The table in this section provides the history of any project specific changes to the project EHS MP. The Construction Manager, or nominated representative, reviews the project EHS MP and related sub plans at maximum three (3) month intervals, with the associated sub plans as identified in Appendix 1.1 reviewed at maximum twelve (12) monthly intervals. The project EHS MP is also reviewed as part of internal independent quarterly audits of the management system and related compliance with legislation and Lendlease Global Minimum Requirements for EHS. Audits are completed to the requirements of the LLB Auditing EHS Procedure.

Project related minor revisions to this EHS MP and related sub plans may be independently issued, but must be approved by the Construction Manager, or nominated representative and the Regional EHS Manager / Head of EHS Integrated Project prior to release. On receipt of a revision:

- The required amendment is incorporated in the revised project EHS MP and sub plans where applicable.
- The date of the revision and new revision issue are listed in the table on page 2 including the purpose and a brief summary of the amendments throughout the Project EHS MP.
- The new/revised project EHS MP or sub plan is issued to the project team including relevant subcontractors, Sydney Metro and other stakeholders and Appendix 11 Plan Signature resigned by the project team. Initial submission of the EHS MP to Sydney Metro will be as outlined in Appendix 10 Special Conditions.
- The independent Environmental Representative (ER) is to consider any minor amendments made to the EHS MP that comprise updating or are of an administrative or minor nature and are consistent with the terms of the planning approval and the document approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. In conjunction with the ER (where required), the independent Acoustic Advisor (AA) is to consider relevant minor amendments made to any noise and vibration document approved by the Secretary that require updating or are of an administrative or minor nature, and are consistent with the terms of the planning approval and the document approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. See Appendix 18 for further detail on ER and AA responsibilities.
- Any amendments not considered minor in regard to requirements of the project planning approval, or not considered consistent with the terms of the planning approval, will be require approval from the Planning Secretary.

Note: Major revisions of the plan template, e.g. revision 4.1 to revision 4.0 require the new revised project plan template approved by the Head of EHS LLB to be implemented with a maximum of three months across all active construction projects.

1.3 DEFINITIONS

Terms used in this document and related LLB EHS Management System documents are defined in the LLB Definitions in the Management of EHS Procedure.

1.4 PROJECT DESCRIPTION

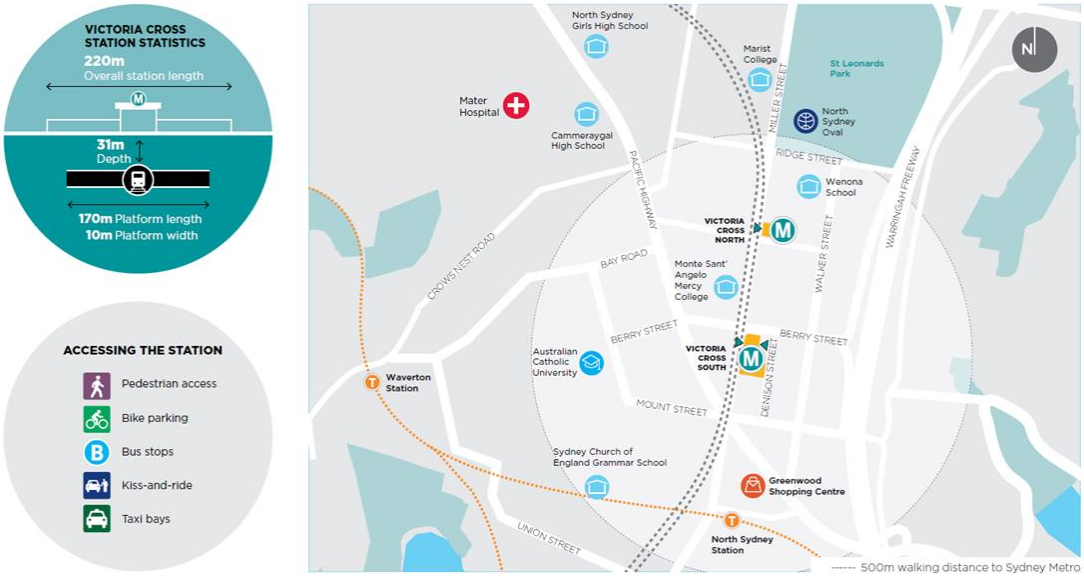
Situated at the corner of Miller and Berry Streets, the new Victoria Cross Integrated Station Development (VC ISD) represents a unique opportunity to create a new precinct in the heart of North Sydney that has seamless access to retail, commercial offices and transport infrastructure.

The new station supports the continued growth of North Sydney, adding to the vibrancy of the area through new employment and retail opportunities, improved pedestrian connections and high quality outdoor spaces.

The concept proposal for Victoria Cross is a 40-storey commercial building above the station's southern entrance integrating retail opportunities and enhancing North Sydney as a thriving commercial, residential, retail and entertainment hub.

The over station development (OSD) and retail opportunity has the following potential features:

(a) commercial office and retail uses;
(b) maximum building height of 230 metres;
(c) maximum gross floor area of approximately 60,000m2 for the OSD; and
(d) up to 4,500m2 of station retail.



Special conditions and requirements relevant to the project are detailed in Appendix 10.

2.0 VISION & POLICY

Lendlease is committed to our vision ‘to create the best places’ through incident and injury free workplaces wherever we have a presence. Our vision is supported by an uncompromising culture which holds the health and safety of people and the protection of the environment as first in all our business reviews and decision making.

The LLB EHS Policy outlines key objectives to deliver an incident and injury free workplace. The EHS Policy and other related policies are located in Source > Our Policies > Building Policies. All LLB policies must be clearly displayed in a prominent location(s) at LLB workplaces, including the project site/workplace office and project/workplace notice board(s) so they are accessible to all employees, subcontractors and other workers, including visitors to the project.

The policies and their objectives must be clearly communicated through the project or workplace induction to all persons working at the site. The policies are also publicly available on request to interested parties.

3.0 PLAN

3.1 RISK MANAGEMENT, IDENTIFYING IMPACTS & HAZARDS/ APPLICATION of EHS MANAGEMENT SUB PLANS

3.1.1 Enterprise Risk/Opportunities

The Head of Environment, Health & Safety Lendlease Building (LLB) Australia maintains a register of EHS risks and opportunities across LLB at an enterprise level. These are outlined in Enablon, the Lendlease EHS Intranet Reporting System and are reviewed and updated at maximum quarterly intervals. The enterprise risks are cascaded to Regional Business Units for consideration and inclusion in local or project related risk management processes where applicable.

3.1.2 Early/Minor Works

The requirements of the Preliminary, Early or Minor Works Contractor Management Procedure are implemented where:

- LLB has management or control of a workplace, or temporary access and control is granted by a Client to a specific area to enable preliminary investigation and related works to be carried out for an LLB business undertaking related to a construction project yet to be commenced; or
- Other minor works that do not meet the definition of a construction project as defined by legislation or involve high risk construction works.

3.1.3 Bid/Opportunity Review

The process of risk management commences in the conversion of a project bid or opportunity. The Lendlease Building Project Conversion Plan (PCP), available on Source http://pcp.lendlease.com/default.aspx is used for all project bids or opportunities. Inclusive of the PCP process is the completion of a LLB EHS Investment Risk Review to determine if the requirements of the Lendlease Global Minimum Requirements (GMRs) for EHS and legislative compliance can be achieved. This requirement is further outlined in the Winning Work section on Source. Open risks identified in the LLB EHS Investment Risk Review must be transferred to the Project Risk & Opportunity Assessment (PROA) register.

3.1.4 Design

Where LLB has management or control of a design function related to a building or structure, the LLB Risk & Opportunity Management Procedure is followed to review design and results are detailed within the LLB Project Risk and Opportunity Assessment Template (PROA). The purpose of the PROA review and related process is to, where reasonably practicable, eliminate risks including potential WHS or equivalent OHS/OSH hazards and risks and potential significant environmental impacts through design change. Where elimination is not reasonably practicable the identified hazards and risks and impacts must be minimised so far as reasonably practicable.

3.1.4.1 Specific Design Reviews

Concept and Detailed Design

A concept and detailed design review of EHS risks is undertaken by Lendlease Applied Insight with key stakeholders in the proposed (preliminary design) concept and detailed design of the building or structure and documented on PROA for the project.

EHS in Design Review

EHS in design risks identified by external design consultants in a Safety Report, or other equivalent report, issued to respond to Work Health & Safety or equivalent legislation requirements for safe design of buildings or structures are included in the PROA for the Project.

Pre-Construction Review

The Project Manager and relevant stakeholders undertake further review(s) of the design through the implementation of the LLB PROA process and review of the existing PROA for the project.

Risk close out/ transfer

Where risks in design have not been eliminated through the PROA process those unresolved risks that relate to workplace activities over which LLB has management or control are transferred to construction, end user or maintenance programs for resolution. Where an unresolved EHS risks with a moderate or greater risk ranking exists, the Project Manager in consultation with the Construction Manager and Regional EHS Manager / Head of EHS Integrated Project must ensure that the risks are transferred to the project specific Impacts & Hazards Risk Assessment, end user or maintenance manuals for the project.

3.1.4.2 Design Change

Design change throughout the design and construction is managed in accordance with the LLB Change Management Procedure and further evaluated during project review meetings. Where the proposed design change (including design of temporary works) has the potential to significantly (moderate or above risk ranking) effect environment, health or safety the design is reviewed to determine a more effective design solution to eliminate the risks so far as reasonably practicable. Where this cannot be achieved the risks are included in the project Impacts & Hazards Risk Assessment or other related document, e.g. end user or maintenance manual to ensure effective management.

3.1.5 Project/Workplace Impacts and Hazards Identification

The Construction Manager (or nominated representative) in consultation with the Site Manager and members of the project team completes a project Impacts & Hazards Risk Assessment (IHRA), prior to commencement of the construction stages of the project. The risk assessment includes any open

(unresolved) risks that require management in the construction stages of a project that were identified in design or other PROA reviews.

The completion of the IHRA is conducted in accordance with the methodology outlined in the LLB EHS Risk Management Procedure, which requires all key risks rated as moderate or greater specific to the project to be included in the IHRA. Control measures related to GMR 4 risk events and other high-risk construction works must implement at least one engineering control or better and one mitigating control, consistent with the Hierarchy of Control.

Note: Impacts and hazards and related risks assessed with a risk ranking of less than moderate are not listed in the IHRA, but are controlled using routine standards and procedures as outlined in the LLB EHS MS and standards outlined or referenced in the LLB Workplace Delivery Code.

The project's IHRA is also used to identify:

- the need for additional specific management sub plans; e.g. noise
- High Risk Construction Work or work which requires a high risk work licence for which a Safe Work Method Statement (SWMS) must be provided that identifies impacts and hazards and outlines control measures consistent with the Hierarchy of Control and copies are retained by LLB.

Lendlease will discuss any recommended improvements by the ER or AA that may be made to work practices to avoid or minimise adverse impact to the environment and to the community, including practices to avoid or minimise adverse noise and vibration impacts.

3.2 LEGAL AND OTHER COMPLIANCE REQUIREMENTS

LLB identifies and maintains access to all WHS/OHS/OSH law and environmental law updates and other compliance requirements (e.g. standards, codes, conditions, approvals and others) which are available at LLB workplaces and on the intranet (see Appendix 2 for further information). WHS/OHS/OSH law, environment protection legislation and other compliance requirements; e.g. codes of practice, Client conditions, development approval and standards that apply to this workplace, are listed in the project Impacts & Hazards Risk Assessment.

Access to current legal and other compliance requirements (either electronic or paper based) is available at all LLB workplaces and key intranet sites for access to further information are listed in Appendix 2.

LLB is required to collect concise data on energy use, carbon emissions, water consumption, waste disposal and waste recovery at a project level. The data is used to monitor a project's environmental performance and to meet Lendlease Corporation obligations under the National Greenhouse and Energy Reporting Act 2007.

Data is recorded in Footprint and verified by each Regional Business Unit, Strategic Business Unit, nominated employee, with oversight by the Lendlease Building National Sustainability Function and external assurance auditors.

3.3 Site/workplace EHS Rules

The Project Team develops specific Site or Workplace EHS Rules that are displayed on entry to the workplace and in other prominent locations that are consistent with the Lendlease vision 'to create the best places' through an incident and injury free workplace. The objective of the site/workplace EHS rules are to:

- inform all worker, visitors and other stakeholders of the minimum requirements that must be adhered to at the workplace to meet specific client, legislative, regulatory and GMR requirements.
- define project specific expectations
- address the project's management of WHS/OHS/OSH hazards and risks and environmental aspects and impacts;
- address any specific client, legislative and regulatory requirements;
- meet the standards outlined by the Lendlease Global Minimum Requirements for EHS (GMR) and LLB Workplace Delivery Code
- ensure visitors to the project are made aware of any Site/Workplace EHS Rules relevant to the site and any areas they will visit, e.g. mandatory PPE;
- inform workers and visitors of perimeter exclusion zone (PEZ) requirements on multi-storey projects where access or work activities are required within 3m of a multi-storey live edge;
- inform workers of the requirements of the LLB Drug and Alcohol Policy and the LLB Fitness for Work – Drug and Alcohol Testing Procedure that apply to all Lendlease Building workplaces.

3.4 OBJECTIVES AND TARGETS

The LLB annual EHS Business Plan outlines objectives and targets for the financial year and these are included in the LLB EHS MS Manual and cascaded to LLB Regional Business Units for implementation.

Objectives and targets specific to the project are outlined in Appendix 3.

3.4.1 Achievement of objectives and targets

Progress against the objectives and targets for EHS are monitored by project team members (as nominated in the table at Appendix 9) in consultation with the Construction Manager, Operations Manager, Regional EHS Manager / Head of EHS Integrated Projects and General Manager for the Regional Business Unit/Strategic Business Unit. The Construction Manager reports on the progress on a six weekly basis in Project Reviews.

Monthly reports on progress against annual EHS objectives and targets are collated by the EHS Head Office Service Function and Regional EHS Managers / Head of EHS Integrated Projects and distributed across LLB.

EHS weekly email performance updates, distributed by the Head of EHS LLB Australia, also outline progress against some specific objective and targets related to incidents.

LLB project personnel nominated to monitor objectives and targets at the project are listed in the table outlined in Appendix 9.

3.4.2 Project objectives and targets monitoring

The Project objectives and targets as listed in Appendix 3 are monitored by:

- The Victoria Cross SLT will develop and agree an annual EHS action plan that aligns with the Sydney Metro Health and Safety Performance Index, that will include project specific EHS objectives, key performance indicators (KPIs) and targets.
- Internal independent EHS audits of a sample of projects at maximum 100 day intervals;

- Annual internal and external audits of selective projects;
- Evaluation of employee, subcontractor and worker EHS performance by reviewing and monitoring: workplace activities, Safe Work Method Statements, or equivalent, implementation through regular observations and inspections by LLB personnel, subcontractors and the workplace EHS Committee/ EHS Consultation Group;
- Review of mandatory training completion rates;
- Incident reporting, investigation and effective communication and evaluation of implemented corrective actions and preventative actions;
- Effective injury management, return to work; and
- Environment protection.

Lendlease personnel tasked with implementing selective objectives and targets are detailed in Appendix 9

3.5 PROJECT SPECIFIC ENVIRONMENT HEALTH AND SAFETY INITIATIVES

In addition to the objectives and targets previously outlined, at least two or more project EHS leading industry practice initiatives should be nominated at the discretion of the Construction Manager, or a nominated representative, in consultation with the Project EHS Coordinator (where appointed) or the EHS Committee / EHS Consultation Group and other relevant key stakeholders.

Outline leading practice initiatives below:

Brief Description of EHS Initiative	Expected Launch Date	Evaluation method for the initiative	Expected Evaluation Date	Related Document (e.g. plan or other)
Rewards and Recognition Program – Quarterly Site Wide BBQ to present rewards and recognition	January 2021	Quarterly discussions in team meetings nominations by delivery team	Quarterly – Ongoing throughout the project duration	Recorded in the team minutes of meeting
Safety Culture Framework Developed	January 2021	Measurable objective and targets	Annually	SLT

3.6 PROCUREMENT OF GOODS AND SERVICES

Tendering for the provision of goods and services is undertaken in line with the requirements of the Business Rules outlined in the Procurement section of Procurement section of Source and is the responsibility of the Construction Manager, or nominated representative. The management of EHS in relation to procurement includes the following requirements:

3.6.1 Goods

Procured goods conforms with the requirements of applicable Australian standards and be able to meet the requirements of approved codes of practice, compliance codes, product specifications, design standards and guidance notes published by the relevant government regulators or industry organisations when those goods are used, installed or commissioned for use.

3.6.2 Services

Procured services include the following documented activities prior to Tender Award:

Prequalification

All prospective tenderers must either have been:

1. capability assessed; or
2. where this system has not yet been implemented for a particular region, the LLB Tender Management System Assessment Form is completed before being invited to tender; to ensure that prospective tenderers have an EHS Management System or equivalent procedures that meet the requirements established by this Plan.

Invitation to Tender

A standard suite of EHS information as outlined in Appendix A of the LLB Invitation to Tender is provided to each prospective tenderer at the time of tender to allow the tenderer to properly prepare their EHS documentation.

Subcontractor Interview Checklist

This Subcontractor Interview Checklist is completed during tender interviews for all works more than $200,000 value to ensure that the tenderer has properly prepared their tender submission to meet LLB EHS requirements and that they understand their obligations for the management of EHS if their submission is to be successful.

Tender Evaluation Template

The vetting and analysis of each tender is undertaken by completing the Tender Evaluation Template to ensure that each tender submission meets the requirements of the LLB EHS MS.

3.6.3 Management of Subcontractor EHS

Subcontractors and other workers must be able to plan and adequately identify impacts and hazards related to the scope of works they are undertaking at the workplace. The Construction Manager or nominated representative provides the following to all subcontractor companies at Tender:

- relevant parts of the project specific EHS MP,
- the project specific Impacts & Hazards Risk Assessment and related prescribed control measures,
- Global Minimum Requirements for EHS,

- the LLB Workplace Delivery Code;
- the LLB Subcontractor Guide to EHS; and
- other information applicable to the scope of works to be undertaken.

The list of EHS information required to be provided by each Tenderer is included by the Construction Manager or nominated representative in pre-tender or pre-contract interviews, including records of discussion of project EHS related information and verification of subcontractor compliance to LLB requirements by completion of the LLB Subcontractor Works To Proceed EHS Checklist.

An itemised list of inclusions in tender/contractor packages and evidence of communication (document transmittal) of the project EHS information is maintained, such as (but not limited to) email, Aconex or other approved communication database.

4.0 IMPLEMENT

4.1 STRUCTURE, RESPONSIBILITY AND ACCOUNTABILITY

The Construction Manager, or nominated representative prepares a project specific organisational chart to define lines of reporting and key names and positions or roles with EHS responsibilities specific to a workplace or project. The chart is outlined in Appendix 4.

Individual roles and responsibilities statements for each workplace may differ; therefore, templates are available on Source > Our Teams & Our People > Roles and Responsibilities. Appendix 5 outlines the EHS Responsibility/Accountability Matrix relevant to this project EHS MP and key responsibilities and accountabilities for EHS.

For all roles detailed in the project specific organisation chart, the responsibilities statement is agreed between the person employed in that role and the Construction/Line Manager. On commencement of a job role outlined in the project organisational chart each person employed in a role meet with the Construction Manager or their appointed line manager to review, discuss and where required agree to their roles and responsibilities statement and any amendments to that statement. The statement is signed and dated by both parties to the discussion as a record of consultation and agreement of the statement and its specific content. The current and signed statements are filed and their location referenced in Appendix 6 of this Plan and in addition all versions are recorded in the project collaboration tool.

Lendlease Building Pty Limited is the Principal Contractor with management or control of the project and its EHS. In addition, all subcontractors, consultants, suppliers and other contractors or workers are also required to comply with their employer's EHS Management System or equivalent and related Safe Work Method Statement(s) the LLB project EHS Site/Workplace Rules, the GMRs, Workplace Delivery Code and applicable legislative requirements.

4.2 TRAINING

The Construction Manager/Workplace Manager has overall accountability for project specific training.

4.2.1 Environment, health and safety training matrix

The LLB EHS Training Matrix identifies key Lendlease Building EHS management tasks as outlined in the LLB EHS MS and GMRs for the position holders or roles who undertake these tasks; and the competencies required for each position to implement these tasks effectively.

Apart from the requirements outlined by the EHS Training Matrix additional EHS training needs may be identified as required in each employee's performance review held with the employee's direct manager.

4.2.2 Workplace specific training planner

Workplace specific EHS training needs and competencies at a construction project or workplace level (e.g. confined space entry, environmental awareness, spill management and plant operator) are outlined in the project/workplace EHS Training Planner (i.e. training needs analysis) compiled by the Construction/ Workplace Manager, or nominated representative. Once identified, the training is categorised as internal or external and tracked to completion with the completion date and validity date in the LLB EHS Training Planner. The planner is reviewed quarterly.

4.2.3 Subcontractors & Other Workers

The minimum training requirements for subcontractors and other workers at this workplace include:

- General Industry WHS/OHS Induction/Safety Awareness Training for the Construction Industry;
- Work activity consultation training in high risk construction work tasks or work that requires a high risk work licence and specific safe work method statements or related documents;
- Subcontractors or service providers may choose to manage construction work, which is not classified as high risk construction work or work that requires a high risk work licence, with their own EHS or equivalent company procedures or processes. It is a LLB requirement that all employees, workers or agents engaged by the subcontractor company have undertaken consultation and training in the content of these company procedures or processes and that evidence of such training is provided to LLB.
- GMR training completion by selective Subcontractor Supervisors for major trade packages that will be undertaking work at the project/workplace for greater 90 days;
- Front Line Leaders (Engage & Influence) Training (1 day) completion by selective Subcontractor Supervisors for major trade packages that will be undertaking work at the project/workplace for greater 90 days;
- Subcontractor supervisors complete training Conduct Local Risk Control for major trade packages that will be undertaking work at the project/workplace for greater than 90 days;
- Subcontractor Supervisors that issue and manage works covered by a Permit To Work must undertake Permit To Work Training;
- Evidence of competence for operators of all mobile plant (and quick cut/concrete saw) operators and prior to the employee operating that mobile plant and equipment.

  Note: a letter provided by the employer for mobile plant operation competence is not sufficient alone and each operator must also have a copy(s) of a licence/certificate issued by a State/Territory; OR a Statement of Attainment /Certificate issued by an Registered Training Organisation; OR evidence of a formal verification of competence assessment against defined competency standards.
- Lendlease Part A Induction completed every 3 years (online delivery link http://onlinelearning.lendlease.com/building_orientation_part_A);
- Workplace specific (Part B) induction and completion of the related induction knowledge assessment; and
- Relevant certificates of competency for work activity related training; e.g. confined space entry; high risk work for which a high risk work licence is required; and electrical work.

4.2.4 Records of Training

Records of Lendlease employee training are retained at the workplace level and copies are uploaded to the LLB Learning and Development (Intranet) Site. The minimum records to be retained by the project/workplace and uploaded to the Learning and Development (Intranet Site) are:

- course outline or content;
- completed attendance records using the LLB Training Attendance Record;
- completed LLB Training Evaluation Form; and
- assessment results (except for RTO delivered training where these results may not be available) and associated certificates of completion.

Records of required qualifications, competencies and specific industry induction requirements for workers other than Lendlease employees (as required) are recorded at the time of induction and retained at the project/workplace.

4.2.5 Worker Induction

All workers must complete the Lendlease Part A Induction prior to attending a workplace for the first time.

Workers that have undertaken the Lendlease Part A Induction within the past three years are required to undertake a brief workplace induction only based on the LLB Workplace Induction Part B located on Source. This will generally include consultation arrangements at the workplace; PPE requirements, designated smoking areas (if permitted); incident reporting, emergency response planning and key personnel at the workplace, workplace specific impacts and hazards and any Client specific requirements. A knowledge assessment must be completed at the conclusion of the induction.

A photocopy of the subcontracting company's employees General Industry WHS/OHS Induction/Safety Awareness Training for the Construction Industry card is taken at the workplace specific induction and any high risk work licence card(s) held by each worker. Photo identification; e.g. drivers licence or passport (to confirm identity) must be sighted only (not photocopied due to Privacy considerations) following the induction to the project (or recorded by the Pegasus System) and the licence number or passport number recorded and listed on the LLB Workplace Induction Attendance Record.

Persons (other than escorted visitors) unable to demonstrate completion of WHS/OHS General Industry Induction/Safety Awareness Training cannot be inducted nor enter the workplace to undertake construction works.

Students or other school/university candidates that seek temporary work experience at Lendlease Building construction projects are inducted to the requirements outlined above. In addition, the Lendlease Building Work Experience and Student Placement Procedure and the requirements outlined in the Workplace Delivery Code under Work Experience, Young Workers and Student Placement must be implemented to ensure that risks related to a lack of experience in construction workplaces are minimised and a positive work experience outcome is achieved.

4.2.6 Visitor Induction

All 'one-off' visitors (unlikely to return) to the workplace must be accompanied at all times by a person that has undertaken the workplace induction. All visitors sign the LLB workplace Visitor Register upon arrival and departure (including time of entry and exit).

Regular visitors (i.e. requiring access twice a month or more) and persons who undertake construction related work activities; i.e. those specifically defined as 'building or construction work', must hold the General Industry WHS/OHS Induction/Safety Awareness Training for the Construction Industry.

All visitors must wear the mandatory personal protective equipment specific to the site and must be informed of emergency response arrangements at the workplace.

Where multi-storey construction exists at the workplace, visitors also complete the LLB Visitor's Agreement and must be informed of perimeter exclusion zone (PEZ) requirements where access to, or work activity is required within 3 metres of a multi-storey live edge (i.e. the PEZ where full containment at the edge has not been achieved and gaps exist). This includes information on the use of tethers/ lanyards/containers or other restraint equipment to prevent fall of loose materials for their safety helmet, mobile phone, tools or other equipment.

Visitors that do not have restraint equipment fitted to their safety helmet or any other loose items they intend to use or operate at the site, e.g. mobile phone, clip board, camera, are not permitted within 3m of any live multi-storey perimeter exclusion zone edge; and acknowledge this risk mitigation measure in the Visitor's Agreement.

Tours, previews or inspections of LLB apartments or other buildings or structures under construction by prospective buyers, lessees or other is managed in accordance with the Lendlease Building Tours, Previews and Inspections Procedure and precautions outlined above to prevent fall of materials on multi-storey construction projects also apply.

4.3 CONSULTATION, COMMUNICATION AND REPORTING

Consultation and issue resolution is managed in accordance with the LLB Consultation Procedure. The Consultation Procedure and relevant WHS/OHS/OSH legislation requires project personnel to consult, share and supply relevant project information with all workers or their representatives and persons conducting a business or undertaking or other subcontractors or service providers with management or control or work to ensure EHS management issues are appropriately discussed and agreed.

This includes the opportunity for workers to respond and contribute to EHS issues that affect them through their workplace EHS Committee or EHS Consultation Group, Health and Safety Representative(s) (HSRs) or by other agreed arrangements between the employer and workers.

The meetings which communicate EHS matters at this workplace are listed in Appendix 7, which specifically outlines those requirements for communicating and consulting on high risk construction works, changes or out of sequence work routines and upcoming high risk construction work by subcontractors or LLB employees.

EHS consultation arrangements agreed at this workplace are identified by the 'marked-up' LLB EHS Consultation Statement. The marked-up statement is displayed in prominent locations at the workplace by the EHS Coordinator, together with the agreed LLB EHS Issue Resolution Flow Chart specific to the project.

The Construction Manager or nominated representative retains a record that demonstrates workers including employees and subcontractors were consulted on the method of EHS consultation agreed at the workplace e.g. LLB EHS Committee Meeting Minutes; election of EHS Committee members and LLB Toolbox Talk or Builder's Brief records.

Subcontractors and other persons with management or control of a business or undertaking at LLB workplaces are required to consult e.g. a Toolbox Talk, with their employees on issues that may impact EHS

and a record of this consultation is maintained and copies forwarded to the Construction Manager or a nominated representative.

Lendlease will discuss any recommended improvements by the ER or AA that may be made to work practices to avoid or minimise adverse impact to the environment and to the community, including practices to avoid or minimise adverse noise and vibration impacts. Regular environmental management meetings are held by Sydney Metro (generally fortnightly), providing a formal pathway for the ER and AA to raise such recommendations. The ER and AA may also contact Lendlease directly (principal contact being the Environment Manager) at any time to discuss such recommendations.

Project specific community, Government agency and external stakeholders are further detailed in Appendix 12. The project Community Consultation Strategy is also further detailed in Appendix 12.

4.3.1 Union Right Of Entry

A holder of a Work Health and Safety (WHS) Entry Permit Holder AND an Entry Permit Holder under the Fair Work Act for the specific State/Territory in which the workplace is situated may enter a workplace to consult with relevant workers on WHS/OHS/OSH matters or for the purposes of inquiry into a suspected contravention of the WHS Act or related act in other states. Details of the requirements for entry by an Entry Permit Holder are outlined in the LLB Union Right of Entry Guideline under WHS Legislation and further detailed in the Safe Work Australia Right of Entry Legislative Fact Sheet.

Further details on EHS consultation, communication and reporting are outlined in the LLB EHS Management System Manual.

4.3.2 Display of environment, health and safety information

To ensure all workers have the opportunity to view, discuss and take note of EHS information, the EHS Coordinator or nominated representative displays the following information (as a minimum) at a prominent location(s) at the workplace, including notice board(s):

Lendlease Building Environment, Health & Safety Policy	Lendlease Injury Management & Return To Work Policy
Lendlease Building Smoke Free Policy	Lendlease Building Noise Control Policy
Lendlease Corporation Harassment & Bullying Policy	Lendlease Building Fitness for Work, Drug and Alcohol Policy
LLB EHS Consultation Statement detailing the consultation arrangements agreed at the workplace	Agreed LLB EHS Issue Resolution Flow Chart specific to the project
Emergency evacuation diagrams including the Evacuation Assembly/Muster Point(s)	Any special environment rules; e.g. flora or fauna protection specific to the workplace.
Site or Workplace EHS Rules Including hours of work	List and photograph(s) of Health & Safety Representative(s), EHS Committee / EHS Consultation Group members
Designated Workgroup members	Crisis Management Escalation Protocol
Amenities plan including first aid shed location	Current EHS Committee / EHS Consultation Minutes
Location of the Spill Kit	Current EHS Alert(s) not more than 6 months old

Personal Protective Equipment requirements	Top 5 Hazards of the week
Designated smoking areas (if any)	Areas where PPE is not required, e.g. amenity areas
Lendlease Injury Management Workplace Injury poster	Incident Reporting Scheme Poster (State/Territory specific) available at Lendlease Injury Management
Incident reporting flow chart (Commonwealth Projects)	Regulatory notices issued within the past 2 months

Emergency evacuation details and contact telephone numbers including:	
Construction Manager or nominated representative	Nearest hospital or emergency centre
First aid officer(s) – photo and contact no.	Nearest medical centre
Emergency Evacuation Diagrams (refer AS3745) displayed at required exits all levels.	After hours emergency contact name and number able to be read from outside the site boundary.
Emergency Call Poster first aid room and other emergency first response team member locations	Contact details determined by the Project Emergency Response Plan
Emergency evacuation required exits each level	HAZCHEM or other signage related to the storage or hazardous substances or dangerous goods at the workplace
Emergency Evacuation Assembly Area	

4.3.3 Toolbox talks, pre-start talks, Builder's Brief or other consultative arrangements

Workers and their supervisors conduct toolbox talk meetings, pre-start talks, Builder's Briefs or other consultative arrangements with those employees or workers under their direct supervision and record the meetings on the LLB Toolbox Meeting Template, Daily Pre-Start Record Template, Builder's Brief Template or equivalent subcontractor document.

A pre-start meeting is conducted daily by each workplace/subcontractor supervisor to discuss EHS matters from the previous day(s), the current day's activities, interfacing trade activities, changes to emergency access and related control measures and other relevant matters. The pre-start meeting is recorded on the Daily Pre-start Record Template, Builder's Brief or equivalent subcontractor document.

Other EHS related meetings are recorded formally where required by completing the LLB form EHS Meeting Minutes; e.g. where discussing SWMS for high risk construction work or work that requires a high risk work licence, a specific work task or other relevant EHS matters. Toolbox talks are undertaken at intervals that keep employees and other workers informed of conditions and changes to the workplace that may affect environment, health and safety.

A copy of daily Pre-start records, Toolbox Talk meeting records, Builder's Briefs records or other consultation meetings are retained and filed in accordance with the LLB Document Filing and Retention Procedure. Items listed for action are reviewed and progress is reported at the next meeting and subsequently until they are corrected.

LLB will ensure that communication and consultation on EHS matters occurs with all workers, including those with limited English or English as a second language. Where required, LLB in consultation with

subcontractor employers will develop appropriate communication to consult with workers with limited English or English as a second language.

4.3.4 EHS Reporting

The project team undertakes reporting and recording of EHS matters to the Regional Business Unit /Strategic Business Unit and the EHS Head Office Service Function as required. All reports and records are collated to provide EHS statistics used to assist the business unit and EHS Head Office Service Function to identify trends in EHS performance, track progress against annual objectives and targets outlined in Appendix 3 and identify impacts/hazards and incidents across all projects and implement corrective action and preventative action.

The Construction Manager also ensures the following reporting activities occur and records and reports are undertaken and retained by relevant Lendlease personnel for audit purposes:

Comply with Sydney Metro Incident notification process: SM PS-FT-509 and ensure

- within 2 hours of a Sydney Metro notifiable incident a text/email is sent to Sydney Metro that specifies the date, time, geographic location, any known facts for the incident and whether it has been notified to the Regulator.
- Where the incident will escalate to a significant incident or crisis an immediate phone call is made to the Sydney Metro Representative or the Metro Safety Manager
- Within 24 hours, a written notification is provided to Sydney Metro, confirming details of the incident, using the Sydney Metro approved Incident Reporting and Investigation Database.
- For a Significant Incident, additional information must be provided to Sydney Metro upon request, including, but not limited to witness statements, interim investigation details, safe work method statements pre-start briefs, or other.
- Notify the independent Environmental Representative of all environmental incidents as soon as practical
- Notify the AA of all noise and vibration incidents as soon as practical.

- The Planning Secretary to be notified of Notifiable Environmental Incidents within 24 hours – refer to Table 1 and Appendix 18 for definition of notifiable environmental incidents. Sydney Metro to notify the Secretary as required after initial reporting from Lendlease.
- Establish project reporting functionality within Enablon by submitting the Enablon “New Operation Request’ form immediately once construction authorisation has been given.
- Special conditions and requirements (if any) documented in Appendix 10.
- Daily, weekly and monthly inspections and monitoring of EHS matters and project compliance to legislation and Lendlease Global Minimum Requirements (i.e. LL Foreman/Supervisor Daily High Risk Construction Work Checklist in Enablon App; Enablon Observation App Project Engineers and EHS Weekly Inspection ; see Part 5 of this Plan for more specific detail).
- Complete Acute Risk Scenario Campaign reporting in Enablon, at maximum quarterly intervals.
- Report all EHS incident events and observations in Enablon.
- Immediately verbal report (and provide a follow up 5 point email within 2 hours) all EHS incident events that have: i) potential to trigger a critical incident event in Enablon; ii) potential to be Notifiable to a Regulator; iii) potential to trigger a crisis management event; iv) potential to involve attendance at the site

by any emergency service or regulatory authority; v) potential to involve hospitalisation of any kind or a Workers' Compensation Claim; or vi) involve potential or actual material harm to the environment.

- Report incidents within Enablon that have the potential to become a Lost Time Injury Incident or Workers' Compensation Injury within 24 hours;
- Report incidents details within Enablon that have the potential to be classified as a Critical Incident; within 24 hours to enable a related incident notification to be published in Enablon not later than three working days after the incident.
- Complete incident investigation reports and related actions within the required time frames specified.
- Calculate and report project productivity hours for both LLB and subcontractor personnel using the LLB Productivity Hours – Calculation Guideline with the total hours entered into Enablon by the 2nd day after the reporting month.
- Report on and provide all regulatory authority notices or other correspondence provided by regulatory authorities, local government or other within 5 working days to the Regional EHS Manager and Head Office EHS Service Function.
- Report on consolidated monthly data and progress against LLB Objectives & Targets at project reviews to senior management.
- Report on impacts and hazards or other non-conformities as incidents or observations in accordance with the following reporting table:

Table 1 – Incident Reporting

Incident reporting and related management of events and corrective and preventative actions are carried out in accordance with the LLB Incident Reporting and Management Procedure. A summary is provided below. Where any inconsistency between Table 1 and the requirements of the LLB Incident Reporting and Management Procedure exists, the requirements of the Procedure apply.

Occurrence/Incident/Report	Initiator	Action	Closing Responsibility
All incidents of injury, near miss, actual or potential significant material harm to the environment, plant or property damage	Project Team Members	Report immediately to the Construction Manager (CM) or nominated representative. Five point email notification to LLB RBU and national managers within 2 hours. Note: Notification to Regulators to be made only after consultation with the Regional EHS Manager / EHS Manager Integrated Project has occurred.	CM
EHS Incident Event Reports	CM/EHS Coordinator	All incident events are to be entered in Enablon. Incident Investigation Report Template, OFSC Incident Investigation Form where required	CM
EHS Observations	Site Engineers	Daily observations entered in Enablon App	CM/SEs
High Risk Construction Work Checklist	Foremen/ Supervisors	Daily observations entered in Enablon App	Foremen/ Supervisors
Identified incident events/ observations with potential consequence of large or very large outcome	All project personnel	Incident event or observation entered reporting in Enablon and close out tracked through Enablon. Observations with Large/Very Large potential nominated must have close out actions assigned and tracked to completion.	CM
Incidents related to Heavy Vehicle Transport to/from the Project greater than 4.5t gross vehicle mass	Project Team Members	Random observations of heavy vehicles for packing, loading and load restraint; mass and dimension; fatigue; vehicle standards and maintenance and any observed breach incident, e.g. load shifted during transport, must be entered in Enablon.	CM
First Aid Injury	First Aid	Register of Injuries completed by First Aid Officer and entered in Enablon.	FA
Medical Treatment Injury (an injury where treatment is provided by a medical practitioner and returns to work without losing a shift of work).	First Aid	Through the appointed First Aid Officer, entered into Enablon within 2 working days (Note: Office Federal Safety Commissioner scheme projects will be further required to complete the OFSC Incident Report for the Regional EHS Manager to review prior to submission to the EHS Head Office Service Function. Injured Employee treatments must be reported to Injury Management Function on 1800 825 055	FA

Occurrence/Incident/Report	Initiator	Action	Closing Responsibility
Lost Time Injury (an injury where a person loses a whole day due to a work related injury or illness)	First Aid	Through first aid officer/SM, reported within 24 hours in Enablon (or suspected LTI) and within 48 hours OFSC Incident Report.	FA
Workers Compensation/Rehabilitation	First Aid	Reported immediately to the Injury Management Function on 1800 825 055 Rehabilitation Monitoring Form (Return to Work) and Workers Compensation forms as required by the LLB Workers Compensation Return to Work Manager	FA
OFSC Incident Report (all LTIs and if OFSC Scheme all MTIs and Critical/Business reportable incidents)	SM/CM	Report to be completed in consultation with the project EHS Manager/EHS Coordinator and submitted to the Regional EHS Manager within 24 hours of incident being notifiable to the local authorities.	CM
Notices, Infringements or related show cause or similar correspondence served from a Government Authority	Regulatory Authority	CM or SM must provide copies to the Regional EHS Manager / EHS Manager Integrated Project and Head of EHS LLB Australia within 5 working days.	CM
Notifiable Environmental Incident Refer Appendix 13 for detail on definitions and reporting requirements.	Environmental Manager	Notify Sydney Metro as soon as possible. Sydney Metro to notify DPIE as required. DPIE to be notified as soon as possible and within 24 hours of any notifiable environmental incident (as defined below and in Appendix 13). Notifiable Environmental Incident: An occurrence or set of circumstances that causes, or threatens to cause, material harm to the environment, community or any member of the community, being actual or potential harm to the health or safety of human beings or to threatened species, endangered ecological communities or ecosystems that is not trivial.	Environmental Manager
ER Incident Notification	Environmental Manager	ER to be notified of all environmental incidents as soon as practical. ER requirements to review incident notifications is detailed in Appendix 18.	Environmental Manager
AA Incident Notification	Environmental Manager	AA to be notified of all noise and vibration incidents as soon as practical. AA requirements to review incident notifications is detailed in Appendix 18.	Environmental Manager

4.4 DOCUMENT AND DATA CONTROL

EHS documents are identified and controlled in accordance with the Lendlease Building Management System document identification and control process located on Source. The current version of EHS documents only are used at the workplace and are available from Source whenever required. Procedures

become 'uncontrolled' from the date of retrieval, downloading or printing from Source. The EHS Head Office Service Function circulates document additions, changes or deletions by regular e-mail revision updates. The process is further outlined in the LLB EHS Management System Manual.

All EHS records for this workplace are filed in accordance with the LLB Document Filing and Retention Procedure. Further information is provided in the LLB EHS MS.

4.5 IMPACTS/HAZARDS IDENTIFICATION, RISK ASSESSMENT AND RISK CONTROL

All work activities undertaken by Lendlease employees, subcontractors or other workers at the project workplace are carried out in accordance with LLB policies, procedures, Global Minimum Requirements, Workplace Delivery Code, WHS/OHS/OSH legislation, environment protection legislation and relevant standards and codes. These requirements, as related to a specific high risk construction work activity or work that requires a high risk work licence, identified in the project Impacts & Hazards Risk Assessment, are included in the respective Safe Work Method Statement specific to the works to be carried out. High risk construction work is defined in the LLB High Risk Construction Work Poster.

4.5.1 Management of Subcontractor EHS

All Subcontractors must provide the following documents prior to commencement of works:

- A SWMS for all work classified as high risk construction work or high risk work that requires a high risk work licence;
- A Training & Skills Register outlining the training and qualifications of the subcontractor's employees or other workers or agents engaged by the subcontractor. The Training & Skills Register must outline evidence of training consistent with the minimum requirements for subcontractors outlined in Part 4.2.3 of this Plan.
- A Plant & Equipment Register for all items of plant and equipment to be brought to the site outlining the inspection and maintenance of that plant and equipment to the manufacturer's requirements and relevant Australian standards. Appendix 8 of this Plan Plant Equipment & Processes Inspection & Testing Schedule outlines key requirements;
- A Safety Data Sheet (or Material Safety Data Sheet) for all products, goods or substances or dangerous goods to be brought to the site for use;
- A Hazardous Substances Register for all products, goods or substances to be brought to site that are classified as hazardous by the Safety Data Sheet or Materials Safety Data Sheet;
- An inspection and test register for all portable electrical tools and electrical equipment to be brought to the site for use;
- A formal process for incident investigation;
- A Waste Management Plan including a minimum of two waste strategies on how the subcontractor will eliminate or reduce waste to landfill by promoting recycling or recovery.
- Additional environment or health and safety management plans where identified by Lendlease (e.g. sedimentation control, dust control, exposure monitoring and health surveillance and noise control), as identified in the project Impacts & Hazards Risk Assessment as a moderate or above risk ranking.
- Inspection and Test Plans which relate to the scope of works must be developed from the SWMS to review the control measures outlined for all plant, equipment and work processes.

Review of the above requirements is undertaken by completing the Lendlease Building Subcontractor Works to Proceed EHS Checklist.

Specific high risk work activities as defined by the Lendlease Global Minimum Requirements and the LLB Permit To Work Procedure are controlled through the use of a Permit To Work (PTW) System. The PTW system is implemented to the requirements of the LLB Permit To Work Procedure. Specific high risk work tasks that require a Permit To Work include:

- Confined Space Entry; Excavation/Ground Penetration; Isolation of Energised Systems; Hot Works; Drill, Cut, Core; Work Within a Ceiling Void; Tower Crane Erection, Alteration, Dismantle; Works Near Overhead Assets /Powerlines and Safety Harness where used as the primary method of fall prevention.

Each permit to work must be completed by the Foreman/Supervisor (i.e. a designated PTW Officer) in control of the work area where the high risk work will be undertaken, prior to the commencement of the work and any related control measures monitored, including any inspections identified on the permit when issued.

4.5.2 Safe Work Method Statements

A SWMS must be developed (or provided by subcontractor) for all high risk construction work and work that requires a high risk work licence prior to commencement of the work. Where a SWMS is developed by LLB for its employees that carry out high risk construction work or work that requires a high risk work licence, it is prepared on the LLB Safe Work Method Statement Template by the Foreman/Supervisor in control of the works in consultation with relevant employees or other workers that will undertake the works. Subcontractors may elect to use their own SWMS template.

The SWMS content must include any construction related health and safety hazards and risks and environment aspects and impacts specific to the works and their related control measures identified in the LLB project Impacts & Hazards Risk Assessment. Where the health and safety hazards and risks and environment aspects and impacts identify a Lendlease Global Minimum Requirements GMR4 risk event at least one engineering control measure and one mitigating control measure as identified in GMR4 must be outlined EHS in the SWMS for the works to be carried out by the subcontractor or other LLB employees. All control measures must be consistent with the Hierarchy of Control.

Note that this means where any of the 20 x GMR4 risk events apply, activities must be managed by implementing the controls and performance standards prescribed against each GMR risk event or an alternative control measure, which achieves an equivalent or greater control. These control measures must be in place before works can commence.

4.5.2.1 Consultation in Safe Work Method Statements

Subcontractor company employees or their agents (other workers) must undertake consultation and training in the contents of the site specific SWMS(s) related to their high risk construction work activities or work that requires a high risk work licence as outlined by legislation and Part 4.2.3 of this Plan. Subcontractor company employees or their agents (other workers) are required to sign their acknowledgement of this consultation and training as part of the SWMS implementation process.

Foremen/Supervisors must review and sign all SWMSs that apply to workers under their control. This requirement is to ensure that Foremen/Supervisors are aware of the safe work methods and related control measures for all high risk construction work activities and work which requires a high risk work licence, for which they have oversight and supervision.

4.5.3 Review of Safe Work Method Statements and Change Management

The SWMS for high risk construction work or work that requires a high risk work licence must be formally reviewed by the Construction Manager, or nominated representative(s), in conjunction with the LLB Foreman/Supervisor or Area Supervisor that will oversee the high risk construction work. The review is

undertaken by completing the LLB SWMS Review Checklist. The LLB EHS Risk Management Procedure provides further information on the definition of high risk construction work and SWMS requirements.

Consultation in high risk construction work activities is outlined in Part 4.3 of this Plan and Appendix 7.

All SWMS must be formally reviewed by the Foreman/Supervisor of the subcontractor or Lendlease works at maximum monthly intervals for the duration of the works.

Where a change in the scope of work is proposed and relates to high risk construction work or work that requires a high risk work licence the SWMS must be reviewed and amended where applicable to include this change before the works can proceed.

4.5.4 Verification of Competence

Subcontractor workers and Lendlease workers are required to provide evidence of competency for all high risk work that requires a High Risk Work Licence. This evidence can be verified by the provision of a current High Risk Work Licence relevant to the high risk work to be completed. Oher supplementary evidence can include certificates or statements of attainment from a recognised learning institution or training organisation for other works not classified as high risk, e.g. manual handling and asbestos awareness.

For mobile plant and equipment operators, subcontractor workers and Lendlease workers are required to provide evidence of the competence prior to any worker operating mobile plant, further outlined in the LLB Workplace Delivery Code. In brief, a letter provided by the Employer is not sufficient to evidence competence to operate mobile plant and equipment. For competence to be evidenced one of the following must be provided:

i) a high risk work licence/certificate issued by a State/Territory; OR

ii) a Statement of Attainment /Certificate issued by an Registered Training Organisation; OR

iii) evidence of a formal verification of competency assessment against defined competency standards for the specific mobile plant or equipment to be operated.

Note that operators of Tower Cranes; Forklift/Telehandler/Motorised (self-propelled) Pallet Trolleys must provide evidence of formal VOC assessment against defined competency standards at three yearly intervals specific to the item of plant being operated, in addition to any High Risk Work Licence already held by the operator.

The Operator of a Quick Cut /Concrete Saw must verify formal training in the safe operation of the saw.

The Subcontractor Guide to EHS outlines further mandatory EHS requirements required of subcontractors including (but not limited to) labour hours, waste reporting and waste reduction plans.

4.5.5 Impacts/hazards identification, control and monitoring

Impacts and hazards related to the workplace are recorded in the Project Impacts & Hazards Risk Assessment. To ensure the IHRA remains current it must be reviewed:

- during project coordination meetings when reviewing the next 4-6 weeks of activities and related GMR independent engineer reviews for acute risks; and
- at maximum six (6) week intervals during Project Review Meetings by the Construction Manager, or a nominated representative, to ensure currency and accuracy.

Workers are encouraged through the workplace specific induction, tool box/pre-start talks and other consultative forums to identify and control health and safety hazards and risks and environment aspects and impacts on a ‘see and fix’ basis where reasonably practicable to do so and to immediately report these impacts and hazards to their supervisor or Lendlease personnel.

Monitoring of the workplace is carried out in accordance with Part 5 of this Plan.

Where high risk impacts or hazards present an imminent or immediate risk of serious harm to a worker is identified that specifically relate to a work area or work task under the control of Lendlease, a subcontractor or other worker due to ineffective or inadequate control measures, the work task shall be stopped. Consultation must then be undertaken with key stakeholders including relevant workers involved in the task to achieve the required control measures as defined by Part 4.3 of this Plan and Appendix 7.

All incident events and observations must be entered in Enablon and related non-conformities must be issued by the Foreman/Area Supervisor with corrective action instigated and agreed by the relevant subcontractor supervisor, which is then tracked in Enablon.

Where faulty or defective plant and equipment is identified, which has the potential to impact on health and safety or the environment it is isolated from use and physically locked out to prevent unauthorised or inadvertent use as detailed in Part 5 of this Plan.

Potential situations where health monitoring may be required are identified in the LLB Impacts & Hazards Risk Assessment developed for each workplace and further information is provided in the LLB EHS MS and the LLB Exposure Monitoring and Health Surveillance Procedure.

4.6 EMERGENCY RESPONSE AND EVACUATION

The Construction Manager, or a nominated representative, in conjunction with other appointed LLB personnel develops an Emergency Response Management Sub Plan (ERMSP) for the workplace including an emergency contact list to be displayed on the workplace notice board and at other prominent locations. The emergency response contact list is included in the ERP.

Each workplace has a documented site specific Emergency Response Management Sub Plan (ERMSP) prepared in accordance with the LLB Emergency Response Procedure and regularly tested in accordance with the table in this section. The LLB Emergency Response Management Sub Plan Template accessed from Appendix 1 can be used as a basis to develop the required workplace specific ERMSP.

Where an Ambulance is called to attend a workplace injury, a Standby Person will be nominated and positioned at the main entry to the workplace to assist Ambulance Officers to locate and attend the injured person as required by the LLB Emergency Response Procedure. A completed Lendlease Emergency Call Poster is displayed at the workplace to provide a summary of information required when making an emergency call; e.g. street address and nearest cross street.

The Emergency Response Management Sub Plan (ERMSP) is reviewed and tested as follows:

Item	Action required & pass/fail requirement	Frequency						Record
		Weekly	Monthly	Quarterly	6 monthly	Yearly	5 yearly	
Emergency Response Management Sub Plan (ERMSP)	Check content and continued relevance to facility/workplace/site including assessment of Evacuation Assembly Area			☒				Review maximum quarterly intervals with revision updates. Quarterly Independent Audit review
Emergency Control	ECO personnel requirements comply			☒				Emergency Control Organisation (ECO) appointed for the project

Item	Action required & pass/fail requirement	Frequency						Record
		Weekly	Monthly	Quarterly	6 monthly	Yearly	5 yearly	
Organisation (ECO)	with the ERMSP and AS3745							
Fire equipment	Fire extinguishers, hose reel or other. Attached compliance tags. Inspection and maintenance by service provider				☒			EHS inspections, Register of Fire Extinguishers maintained in the workplace where 10 or more extinguishers exist.
	Fire extinguishers located at each required exit, hose reels or other. Seals intact. Charged extinguishers in place at relevant locations.				☒			EHS inspections, EHS Committee Minutes. Compliance tag verification and record of inspection and testing at 6 monthly intervals displayed on the tag.
	Fire risers, hose reels and booster valves for multistorey buildings under construction >12m high comply with BCA E1.9		☒					EHS Site Assessment Checklist
	Pressure alarm to risers for multistorey buildings under construction >12m high		☒					Logbook maintained by service provider. Monthly pressure check or test after any riser alteration Recorded in EHS Site Assessment Checklist or EHS Observation Enablon.
Evacuation equipment	Emergency lighting		☒					Logbook maintained by service provider.
Emergency Warning equipment	Emergency Warning and Intercommunication System (EWIS)		☒					Logbook maintained by service provider. Monthly test or test after any relocation recorded in EHS Site Assessment Checklist
Emergency Warning equipment	Fire alarms (audible & visual) to welfare areas.		☒					Logbook maintained by service provider. Monthly test or test after any relocation recorded in

Item	Action required & pass/fail requirement	Frequency						Record
		Weekly	Monthly	Quarterly	6 monthly	Yearly	5 yearly	
								EHS Site Assessment Checklist
Evacuation Drill	Evacuation exercise compliance with the emergency response plan (ERMSP) and GMR				☒			EHS Committee Minutes, Completed LLB form Emergency Event Evaluation Form or through the Enablon Inspection App
Emergency Event Drill	Emergency scenario response (taken from ERMSP Identified emergency scenarios)				☒			Completed LLB form Emergency Event Evaluation Form or through the Enablon Inspection App
Emergency Evacuation Awareness Training	All workers on site have undertaken the site induction that includes emergency evacuation awareness							Induction Records
Emergency Control Organisation and Emergency Response Team Training	Project ECO & ERT members undertake formal emergency response training – wardens and others						☒	Training records
Evacuation Assembly area(s)	Nominated areas checked as suitable and relevant to ERMSP	☒						EHS Inspections

5.0 IMPROVE

5.1 MONITORING OF THE WORKPLACE

Monitoring of the workplace includes those actions required to verify that the management of Environment, Health & Safety (EHS) conforms to the LLB EHS MS, Lendlease Global Minimum Requirements for EHS, legislation and related codes or standards and other compliance requirements applicable to the workplace, such as Development Approvals and Development Conditions.

The project workplace is monitored and inspected as follows:

Workplace Monitoring Schedule				
Task	**Type of Monitoring**	**Monitoring By**	**Frequency**	**Record**
General work areas	Hazard / Impact Observations	Project Engineers	Daily	Enablon Safety App Observation
Impacts & Hazards Risk Assessment	Project Reviews	Construction Manager	Ongoing	Six weekly Project Review Meeting Minutes Updated IHRA
Acute Risk Scenarios	Quarterly Campaign Project Review Meetings	Construction Manager/ Project Engineers	Ongoing	Completed Enablon Quarterly Campaign Six weekly Project Review Meeting Minutes
High Risk Construction Work/ High Risk Work requiring a licence in a specific area/ or a Permit to Work	Enablon App HRCW Checklist	LLB Area Foreman/ Supervisor	Daily	Completed LLB Enablon App / HRCW Checklist.

Workplace Monitoring Schedule				
Task	**Type of Monitoring**	**Monitoring By**	**Frequency**	**Record**
Subcontractor work activities	Work Activity EHS Inspection	Subcontractor Area Foreman/Supervisor	Daily	Completed Subcontractor's EHS Inspection Checklist
All general work areas including plant and equipment	Weekly EHS Inspection	Site Manager; EHS Coordinator, EHS Committee/ EHS Consultation Group	Weekly	Completed EHS Weekly Site Inspection Form EHS Committee/ EHS Consultation Group Minutes
All general work areas including plant and equipment	EHS Inspection	Construction Manager	Maximum Monthly intervals	Completed EHS Site Assessment Checklist.
Public interface areas	Hoardings/ gates or other outward facing elements.	Competent person	Daily or as determined by the IHRA.	Completed Fencing Hoarding Inspection Checklist
EHS Monitoring DA Conditions or other	EHS monitoring identified by the IHRA e.g. noise, water quality or other.	Competent person	As required	Completed LLB forms or equivalent: Noise Monitoring Register Water Quality Register Monitoring outlined in EHS sub-plans
Waste monitoring	Dockets verifying: 1) waste classification, 2) waste generator, 3) waste transporter, 4) Facility receiving the waste	Construction Manager	Monthly	Dockets verifying all waste removal, transport and disposal from site. Subcontractor waste reduction initiatives – see Part 4.5.1 of this Plan
Calibration of EHS Monitoring equipment	Manufacturer's calibration	Competent person	As required	Calibration Certificate
Heavy Vehicle Transport Laws (Chain of Responsibility	Random observations of heavy vehicles for packing, loading and load restraint; mass and dimension; fatigue; vehicle standards and maintenance	Construction Manager	Daily sampling	Enablon Observation App
Subcontractor Works	EHS&Q Subcontractor Audit	Construction Manager/ Nominated Representative	High Risk Construction Work and High Risk Work trades	Completed Schedule of Subcontractor Audits based risk profile. Completed LLB EHS&Q Subcontractor Audit with close out actions verified.

Workplace Monitoring Schedule				
Task	**Type of Monitoring**	**Monitoring By**	**Frequency**	**Record**
ER inspections	Independent inspection	ER and Environmental Manager (or delegate)	Completed on an 'as-needs' basis at the discretion of the ER.	ER site inspection record. Refer Appendix 15 for detail.
DPIE compliance inspection	Regulatory authority compliance inspection	DPIE and Environmental Manager (or delegate)	As requested by DPIE	DPIE site inspection record. Refer Appendix 15 for detail.
Independent Environmental Compliance Audit	External/Independent Audit	Independent Environmental Auditor and Environment Manager (or delegate)	As directed by Sydney Metro	Independent Environmental Auditor audit report. Refer Appendix 16 for detail.
CSSI Compliance Reporting	Compliance Reporting	Environmental Manager (or delegate)	Quarterly	CSSI Compliance Tracking Report. Refer Appendix 16 for detail.
Groundwater Monitoring Report	Environmental monitoring report	Environmental Manager (or delegate) and geotechnical consultant	6 monthly	Groundwater Monitoring Report. Refer Appendix 15 for detail.
Noise and Vibration Monitoring Report	Environmental monitoring report	Environmental Manager (or delegate) and noise and vibration consultant.	6 monthly	Noise and Vibration Monitoring Report. Refer Appendix 15 for detail.
AA inspections	Independent inspection	AA and Environmental Manager (or delegate)	Completed on an 'as-needs' basis at the discretion of the AA.	AA site inspection record. Refer Appendix 15 for detail.

Environmental monitoring programs for noise and vibration monitoring and groundwater monitoring are detailed further in Appendix 15 and the corresponding subplans.

5.2 MONITORING OF PLANT, GOODS, EQUIPMENT AND PROCESSES

The monitoring of plant, goods, equipment and processes to determine the effective management of EHS at this workplace is determined in accordance with the schedule outlined in Appendix 8 – Plant, Equipment & Processes Inspection & Testing Schedule of this Plan.

5.2.1 Incoming Plant and Equipment

Plant and equipment provided must be fit for purpose and comply with the manufacturer's recommendations and relevant Australian standards and be supplied with the following required items not limited to:

- A register listing the plant and equipment and its current and ongoing inspection and maintenance regime;
- Records of current inspection and maintenance (see Part 5.2.4 of this Plan);
- A risk assessment specific to the plant or equipment, including any attachments to the plant proposed for use;
- Evidence of the competence of the Operator in the use of the plant and equipment as outlined by Part 4.4.5 of this Plan.
- Evidence of the Plant Item Registration and the Plant Design Registration issued by the relevant WHS/OHS/OSH State/Territory for those plant items as outlined in Appendix 8.

Incoming plant and equipment is checked by using any, or a combination of the following checklists: the LLB Plant and Equipment Inspection Checklist appropriate for the item of plant and the LLB Lifting Gear Inspection checklist or equivalent subcontractor lifting gear checklist and register. Records of LLB plant and equipment procured by Lendlease are maintained in the LLB Project Plant Register or the LLB Lifting Gear Register and subcontractors maintain an equivalent register for their procured plant and equipment.

The requirements of the Mobile Equipment Tag Procedure apply to all incoming plant and equipment covered by that procedure to provide a visual indication that those items of plant and equipment have been reviewed and are ready for use.

5.2.2 Incoming Goods

Incoming purchased goods with the potential to impact environment, health and safety must conform with the National Construction Code and applicable Australian or international standards. Those non-conforming goods are removed from service, secured against further use, recorded in Aconex as part of the Lendlease Quality System, then returned to the supplier. If the goods remain on-site pending verification by the supplier or rectification, they are quarantined from use and marked or otherwise identified as quarantined and not for use.

5.2.3 Calibration

Calibration of EHS measuring and testing equipment is carried in accordance with the requirements of the LLB Calibration of Equipment for EHS Monitoring Procedure. Calibration is carried out to ensure that the precision of Lendlease and subcontractor EHS measuring and testing equipment is accurate, is of the proper range and type and is able to verify conformance to company, client and legislative requirements.

5.2.4 Plant and Equipment Installation/Dismantling/Inspection/Maintenance

Proposed installation, inspection, maintenance and dismantling of plant on the project is risk assessed to determine if the works can be undertaken on the project. All works must be carried out to the requirements of GMR4.3.6. In particular, precautions around the following are highlighted: dangerous energy (e.g. lock out/isolation against inadvertent start up), stored energy (e.g. charged, tensioned, pressurised, or sprung components with potential for sudden release, including contact with electricity); instability of large mass

components and overturning; and entanglement or entrapment (e.g. concrete boom pump heads, tower crane sections).

Inspection and maintenance of all plant and equipment is undertaken by a competent person (e.g. Plant Owner, Plant Mechanic and Plant Engineer) prior to use at an LLB workplace and as per the manufacturer's specification. In addition, it is important that competent personnel working on such equipment (e.g. Fitters/Mechanics) ensure that they position themselves and others out of, or away from, the line of fire of any potential stored (dangerous) energy release and that this energy is isolated and locked out in accordance with basic risk management principles.

In addition to routine inspection and maintenance, competent persons undertake and document monitoring and inspections of plant and equipment prior to use (pre-start check by the operator), daily or at intervals specified by the manufacturer. The pre-start check by the Operator is recorded in the pre-start check record booklet provided by the owner/manufacturer of the plant.

In some instances, plant and equipment may require further inspection and certification by qualified personnel where the configuration can be altered (e.g. cranes and hoists).

Subcontractors are required to maintain inspection and test records and a Plant Register(s) for their plant and equipment located on the site. LLB is required to maintain inspection and test records and a Plant Register(s) for its plant and equipment on the site.

Maintenance of hired plant and equipment is the responsibility of the supplier/hire company. If a supplier/hire company fails to maintain its plant and equipment and site inspection reveals the equipment requires maintenance/repair, or has the potential to create risks to environment, health and safety, the plant and equipment is quarantined, locked out to prevent unauthorised or inadvertent operation and as a secondary measure an Out of Service Tag attached. Personnel will inform their supervisor who in turn will ensure the supplier/hire company complies with its maintenance requirements.

Faulty or defective plant and equipment, which has the potential to impact on health and safety or the environment are removed from service by the worker or their supervisor who has identified the fault and locked out and tagged out in accordance with the LLB Lock Out Tag Out Isolation Procedure or equivalent contractor procedure.

5.3 NON-CONFORMITIES AND CORRECTIVE/PREVENTATIVE ACTION

All non-conformities from reviews, audits, workplace inspections/assessments, impact/hazard notification reports and incidents must be reported in Enablon with corrective and preventative action identified to resolve the non-conformity. Corrective and preventative actions are consistent with the Lendlease Global Minimum Requirements for EHS and the Hierarchy of Control. Action items are implemented in a timely manner to prevent recurrence of the non-conformity and where related to a critical incident where a worker was exposed to imminent or immediate risk of serious harm the corrective and preventative actions implemented are monitored to evaluate their effectiveness for a period of 30 to 60 days.

All environmental non-conformances will be reported via Enablon and notified as soon as practical to the ER and Sydney Metro. From the information entered into Enablon, corresponding non-conformance reports can be produced. Within 48 hours, non-conformance reports will be issued to the independent Environment Representative and Sydney Metro for environmental non-compliances raised on the project.

It is noted that notifiable environmental incidents as defined in Appendix 13 will be administered as per the requirements of this section.

Further information is contained in LLB EHS MS Manual. Where non-conformities are not resolved (rectified) within 30 days they shall be elevated to the Head of EHS LLB Australia for resolution.

5.4 MONITORING & ACTIONS ARISING

Where the results of monitoring of the workplace and related plant, equipment, processes, goods, conditions or a critical incident occurrence identifies risks that are ranked as moderate or above the Construction/Workplace Manager, or a nominated representative, reviews the Project Impacts & Hazards Risk Assessment to determine:

- the adequacy of the content of the risk assessment; i.e. if the hazard and risk or aspect and impact related to the non-conformity or other monitoring is included in the risk assessment; and
- the effectiveness of control measures consistent with the Hierarchy OF Control and GMR 4; for short term and long term duration; and
- the effectiveness of monitoring activities related to each moderate or above impact or hazard listed in the IHRA.

The time frame for rectification of actions raised by any inspection, audit, non-conformity or other monitoring activity, or a critical incident occurrence is determined by the Regional EHS Manager / EHS Manager Integrated Project but shall not exceed 30 days.

5.4.1 Incidents at the workplace

Workplace environment, health and safety incidents are reported immediately on becoming aware of the incident and not later than 24 hours after the incident in accordance with the LLB Incident Reporting and Management Procedure. Information regarding the incident event must be entered into the LLB Intranet reporting system Enablon. The LLB Register of Injuries or the equivalent Enablon entry is completed where a worker has been injured and the workers employer must be notified.

Incidents involving injury, near miss, damage to plant and equipment, and actual or potential harm to the environment are managed in accordance with the LLB Incident Reporting and Management Procedure.

Where an incident meets the criteria of notifiable to a Regulator, the incident scene must be protected (preserved) and not disturbed until the Regulator formally advises release of the area. This notification must occur in a timely manner as required by legislation and except in exceptional circumstances, would normally occur after discussion with the Regional EHS Manager / EHS Manager Integrated Project.

Critical incidents and notifiable incidents involving emergency services and the regulatory authority(s) require immediate notification to the Construction Manager, or nominated representative and the Regional EHS Manager / Head of EHS Integrated Project.

Where an incident at the workplace may be classified as a Crisis the Construction Manager notifies the incident in accordance with the reporting structure outlined in the Crisis Incident Escalation Protocol; which is displayed at the project. The Regional EHS Manager / EHS Manager Integrated Project immediately notifies the Regional Business Unit (RBU) Operations Manager, RBU General Manager and the Head of EHS LLB Australia in accordance with this Protocol.

Notices, fines or show cause correspondence issued by any Regulatory Authority to any LLB workplace are reported and forwarded to Lendlease personnel as outlined in Part 4.3.4 of this Plan. Copies of Regulatory Notices issued must be displayed prominently in the workplace as outlined in Part 4.3.2 of this Plan.

Where requested Sydney Metro may participate in any investigation being undertaken and Lendlease Building will:

- provide Sydney Metro all assistance required for the purposes of the investigation;
- provide a copy of the agreed investigation report;
- attend any final investigation report meeting and
- close out the corrective and preventative actions in Sydney Metro's approved Incident Reporting and

Investigation Database.

5.4.2 Injury management and return to work

All employee injuries that occur at work, or in the course of work related travel and result in time off or an inability to complete normal duties are managed in accordance with the Lendlease Injury Management & Return To Work Policy and Lendlease Return to Work Program. Injury grab packs, letter to the doctor, project start-up checklists and other injury management resources can be found on the Lendlease Injury Management intranet site.

5.4.3 Unacceptable behaviour

Where unacceptable behaviour by a worker(s), including employees or subcontractors, is observed and presents an imminent risk of serious harm to the individual worker or others; or material harm to the environment, the work activity must be stopped. The incident is then elevated to the immediate supervisor of the works and other relevant stakeholders.

The incident must be managed by the Construction Manager, or nominated representative, in consultation with the RBU/SBU Operations Manager and Regional EHS Manager. Employees or subcontractors may be removed from the project following a single unacceptable 'at risk' behaviour (i.e. with a large or very large potential outcome). A determination of the consequence management related to an incident and its potential outcome is carried out in consultation with worker's employer, supervisor and Health & Safety Representative. Alternatively, the consequence management issued to a worker may be a first warning in relation to an incident and removal from site following any repeated incident of unacceptable 'at risk' behaviour, which presents an imminent risk of serious harm to the individual worker or others.

A non-conformity related to the observed 'at risk' behaviour must be recorded as an observation in the Enablon App and the potential outcome of the behaviour, e.g. potential serious injury, along with the management actions implemented.

5.4.4 Counselling and employee assistance

Lendlease operates a 24 hour per day 7 days a week counselling service for all Lendlease employees. More detailed information can be found at the Lendlease Employee Assistance Program web page.

The EAP can be contacted 7 days a week and 24 hours per day on:
Australia Phone: 1800 80 83 74 **New Zealand Phone: 0800 20 02 77**

Manager Support Program Phone: 1800 50 50 15

APPENDIX

APPENDIX 1.1 EHS MANAGEMENT SUB PLANS

Management sub plans are identified in the Impacts & Hazards Risk Assessment as outlined in Section 3.1. The Construction Manager or nominated person is responsible for implementing and maintaining the management sub-plan(s) and their requirements.

Sub-Plan Name	Required	Reason
Acid Sulphate Soil Management Sub Plan	☐	Not Required
Air Quality Management Sub Plan	☒	Air Quality Management procedure in Appendix 22
Asbestos & Hazardous Building Material Management Sub Plan	☒	LLB Sub Management Plan
Chain of Responsibility Management Sub Plan (National Heavy Vehicle Transport Law)	☒	Mandatory with all EHS MP All heavy vehicles over 4.5t GVM deliveries to/from site
Conservation & Habitat Management Sub Plan	☒	Conservation and Habitat Management Procedure in Appendix 23
Contamination Management Sub Plan	☒	Contamination Management Procedure in Appendix 24
Crane Management Sub Plan	☒	Tower and Mobile Cranes
Emergency Response Management Sub Plan	☒	Mandatory with all EHS MP
Fitness for Work Plan Fatigue Management Sub Plan	☐	Mandatory where project is FIFO or scheduling will exceed 5 days on / 2 days off, or a 60-hour working week.
Fitness For Work Drugs & Alcohol Project Testing Management Sub Plan	☒	LLB Sub Plan
Hazardous Substances/Dangerous Goods Management Sub Plan	☒	LLB Sub Management Plan
Heritage & Archaeological Management Sub Plan	☒	Refer to VCISD Construction Heritage Management Plan (CSSI equirement)
Noise & Vibration Management Sub Plan	☒	Refer to VCISD Construction Noise & Vibration Management Plan (CSSI Requirement)
PFAS Management Sub Plan	☐	Not Required Mandatory for ground works on Defence air bases and airports
Stakeholder Engagement Plan	☒	Refer to VCISD Community Communications Strategy and VCISD Business Management Plan

Sub-Plan Name	Required	Reason
Stormwater Erosion & Sedimentation Management Sub Plan	☒	Stormwater and Erosion Management Procedure in Appendix 21
Tenancy Management Sud Plan	☐	Not Required
Traffic & Parking Management Sub Plan	☒	Refer to VCISD Construction Traffic Management Plan (CSSI Requirement)
Waste Management Sub Plan	☒	Mandatory with all EHS MP. LLB Sub Management Plan & Reference within Sustainability Management Plan Appendix E – Waste Management and Recycling Plan
Water Resource Management Sub Plan	☐	Not Required
Occupational Health & Hygiene Management Sub Plan	☒	
Construction Environmental Management Plan	☒	This EHS Management Plan developed to satisfy requirements under the Critical State Significant Infrastructure (CSSI) planning approval. (CSSI Requirement)

Critical State Significant Infrastructure (CSSI) Environmental Management Sub Plans

Detailed, issue specific environmental management sub plans will be prepared on key environmental elements for the Project, documenting aspects, impacts, safeguards and monitoring requirements for each key environmental element, nominate who is responsible for implementing controls - noting the frequency/timing of implementation, and set objectives and targets, and identify measurable key performance indicators in relation to the sub plan aspect.

The CSSI approval and Project Specifications define the content and issues to be addressed in the required sub plans. Lendlease has prepared specific environmental sub plans to the EHS MP, as per the conditions of approval C3, C4 and C5, the Sydney Metro Construction Environmental Management Framework (CEMF) and in accordance with the Sydney Metro City and Southwest Chatswood to Sydenham Staging Report (Staging Report), noting that the Victoria Cross Integrated Station Development is termed VC - ISD within the Staging Report. Consultation with relevant agencies is to include the Department of Planning, Industry and Environment (DPIE), NSW Environmental Protection Authority (EPA), Department of Primary Industries (DPI) Water (now Natural Resources Access Regulator - NRAR), North Sydney Council and the NSW Heritage Council (or delegate). Where an agency request is not included in a sub plan, justification will be included to DPIE with submission of the respective sub plan. Details of all information requested by an agency will be included in the respective sub plan as a result of consultation and copies of all correspondence from those agencies, will be provided with the relevant sub plan.

EHS MP sub plans, where required, will be submitted to DPIE along with, or subsequent to, the submission of this EHS MP but in any event, no later than one month before commencement of construction. Further to section 1.2, EHS Plan subplans required under the CSSI approval will be reviewed on a 6 monthly basis. The purpose of each sub plan is to document how specific environmental risks will be managed, and the relevant performance outcomes specified in the project Environmental Impact Statement (EIS) and Preferred Infrastructure Report (PIR) will be met. Aspect specific sub plans or separate plans required by the CSSI conditions developed for VCISD works are:

- Construction Noise and Vibration Management Plan
- Construction Heritage Management Plan
- Construction Groundwater Management Plan

- Construction Traffic Management Plan

Aspect specific sub plans or separate plans required by section 3.4 of the CEMF for VCISD works are:

- Construction Spoil Management Sub Plan;
- Construction Visual Amenity Sub Plan;
- Construction Carbon and Energy Management Sub Plan (to be incorporated into the Sustainability Mangement Plan);
- Construction Materials Management Plan (to be incorporated into the Sustainability Mangement Plan);
- Construction Waste Management Sub Plan (to be incorporated into the Sustainability Mangement Plan).

It is noted that the City and Southwest Chatswood to Sydenham Staging Report (Staging Report) details extent of applicability of the various aspects of the planning approval, CEMF and Revised Environmental Mitigation Measures. The Staging Report also outlines how these aspects will be covered in the project documentation (aspect specific sub plan or addressed within the Construction Environmental Management Plan). This is summarised below, including for each environmental management category:

- Whether a stand-alone 'CEMP sub-plan', 'CTMP', 'SMP sub-plan' or 'WFDIP Plan' will be prepared.
- Whether the category risks will be addressed in the main CEMP/SMP document in the form of a procedure ('CEMP-P' or 'SMP-P'),
- Whether the category risks will be addressed in the main CEMP/SMP document only ('CEMP' or 'SMP'), or
- Whether the category risks are not applicable to the stage ('N/A').

CEMF Environmental Management Category	SYAB	NCW-P7	Demolition A & B	TSE	CSM	SSJ	MP ISD – Demolition	ISD	BS	LW	TSOM
Spoil	N/A	N/A	N/A	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	N/A	CEMP sub-plan	CEMP	CEMP sub-plan	CEMP
Groundwater	N/A	N/A	N/A	CEMP sub-plan	CEMP sub-plan	CEMP -P	N/A	CEMP sub-plan	CEMP	CEMP	CEMP
Traffic	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP	CoA E82 CTMP
Noise & Vibration	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan
Heritage	CEMP sub-plan	CEMP -P	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP -P
Flora & Fauna / Biodiversity	CEMP -P	CEMP -P	CEMP -P	CEMP sub-plan	CEMP sub-plan	CEMP -P	CEMP -P	CEMP -P	CEMP -P	CEMP -P	CEMP -P
Visual Amenity	CEMP -P	CEMP -P	CEMP -P	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP -P	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan
Carbon & Energy	N/A	N/A	N/A	SMP sub-plan	SMP sub-plan	SMP sub-plan	N/A	SMP sub-plan	SMP sub-plan	SMP sub-plan	SMP sub-plan
Materials	N/A	N/A	N/A	SMP sub-plan	SMP sub-plan	SMP sub-plan	N/A	SMP sub-plan	SMP sub-plan	SMP sub-plan	SMP sub-plan
Soil & Water	CEMP -P	CEMP -P	CEMP -P	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP -P	CEMP -P	CEMP -P	CEMP sub-plan	CEMP -P
Air Quality	CEMP -P	CEMP -P	CEMP -P	CEMP sub-plan	CEMP sub-plan	CEMP sub-plan	CEMP -P	CEMP -P	CEMP -P	CEMP sub-plan	CEMP -P
Waste (and Recycling)	CEMP -P"	SMP-P	SMP sub-plan	SMP sub-plan	SMP sub-plan	SMP sub-plan	SMP-P	SMP sub-plan	SMP sub-plan	SMP sub-plan	SMP
Workforce Development	WFDIP Plan	N/A	WFDIP Plan	WFDIP Plan	WFDIP Plan	WFDIP Plan	WFDIP Plan	WFDIP Plan	WFDIP Plan	WFDIP Plan	WFDIP Plan

To satisfy the 'procedural' requirements listed for ISD projects, project specific procedures have been included, as outlined below

Required Management Procedure Aspect	VCISD Corresponding Reference
Flora & Fauna / Biodiversity	Conservation & Habitat Management Procedure
Soil & Water	Stormwater Erosion & Sedimentation Management Procedure
Air Quality	Air Quality Management Procedure

It is also noted that compliance with requirements from the Revised Environmental Mitigation Measures listed in the Sydney Metro Chatswood to Sydenham Submissions and Preferred Infrastructure Report and associated Modification Reports will be outlined as part of the relevant sub plan.

Consultation and Approval Requirements

The CSSI conditions require the preparation of this EHS MP , a number of sub plans. The CEMF also requires the preparation of a number of aspect specific management plans.

This EHS MP , and all environmental plans, have been designed to address client expectations and requirements, and adequately address risks and stakeholder concerns. The CSSI approval requires Lendlease to consult with specific authorities and stakeholders in the preparation of this EHS MP and associated sub plans. The table below indicates approval required (A), endorsement required (E), consultation (C) and submit for information (I) required by the CSSI approval for the various documents.

Document	Primarily required by	Sydney Metro	Heritage Council (or delegate)	RAPs	City of Sydney Council	RMS	SCO	Acoustic Advisor	ER[1]	Emergency Services	EPA	OEH	DPI Water (NRAR)	DPIE
EHS Management Plan (this plan), content to satisfy CEMP requirements only.	CSSI C5	C							E					A
Construction Noise and Vibration Management Plan (including monitoring program)	CSSI C6	C			C			E	E		C			A
Construction Noise and Vibration Impact Statement	CSSI E33	C						E						
Construction Heritage Management Plan	CSSI C6	C	C		C				E					A
Construction Traffic Management Plan	CSSI E82	C			C	A	E			C				I
Community Communication Strategy[3]	CSSI B3	C												A
Business Management Plan	CSSI E64	C												
Tree Report	CSSI E6	C												I
Groundwater Management Plan	CSSI C3	C							E				C	A

Heritage Interpretation Plan	CSSI E21	C	C	C										I
Station Design and Precinct Plan [2]	CSSI E101	C			C									A
Sustainability Management Plan	CEMF Section 3.2	A												
Workforce Development and Industry Participation Plan	CEMF Section 3.2	A												
Spoil Management Plan	CEMF Section 3.4	A												
Visual Amenity Management Plan	CEMF Section 3.4	A												
Carbon and Energy, Materials Management and Waste Management and Recycling to be incorporated into the Sustainability Management Plan	CEMF Section 3.4	A												

Note 1 *– As per MCoA A24(d), the ER is required to review and endorse all documents required to be prepared under the planning approval to ensure they address any requirements of the approval. For documents requiring specialist review and/or endorsement, the ER is not required to endorse the specialist content.*

Note 2 *– The VCISD SDPP also requires demonstrated consultation with the community.*

Note 3 *– The Sydney Metro Overarching CCS has been approved to satisfy this condition. A VCISD specific CCS will be developed for the project, consistent with the Sydney Metro Overarching CCS..*

APPENDIX 1.2 EHS SUB PLANS – OVER STATION DEVELOPMENT (OSD)

To be completed prior to commencement of OSD
Sub plans are identified in the Impacts and Hazards Risk Assessment as outlined in Section 3.1. The Construction Manager or nominated person is responsible for implementing and maintaining the sub-plan(s) and their requirements.

Sub-Plan Name	Required	Reason
Acid Sulphate Soil Management Sub Plan	☐	
Air Quality Management Sub Plan	☐	
Asbestos & Hazardous Building Material Management Sub Plan	☐	
Chain of Responsibility Management Sub Plan (National Heavy Vehicle Transport Law)	☒	Mandatory with all EHS MP All heavy vehicles over 4.5t GVM deliveries to/from site
Conservation & Habitat Management Sub Plan	☐	
Contamination Management Sub Plan	☐	
Crane Management Sub Plan	☐	Mandatory where project has cranes
Emergency Response Management Sub Plan	☒	Mandatory with all EHS MP
Fitness for Work Plan Fatigue Management Sub Plan	☐	Mandatory where project is FIFO or scheduling will exceed 5 days on / 2 days off, or a 60 hour working week.
Fitness For Work Drugs & Alcohol Project Testing Management Sub Plan	☐	Mandatory where D&A Testing is implemented
Hazardous Substances/Dangerous Goods Management Sub Plan	☐	
Heritage & Archaeological Management Sub Plan	☐	Mandatory where heritage buildings are present.
Noise & Vibration Management Sub Plan	☐	Mandatory in built up areas
PFAS Management Sub Plan	☐	Mandatory for ground works on Defence air bases and airports Not applicable for Vic Cross.
Stakeholder Engagement Plan	☐	
Stormwater Erosion & Sedimentation Management Sub Plan	☐	
Tenancy Management Sub Plan	☐	
Traffic & Parking Management Sub Plan	☐	Mandatory where traffic and pedestrians are present.
Waste Management Sub Plan	☒	Mandatory with all EHS MP.
Water Resource Management Sub Plan	☐	
Occupational Heath & Hygiene Plan	☐	

APPENDIX 2 KEY ENVIRONMENT AND WHS/OHS/OSH LEGISLATION

The construction works are to be conducted in accordance with all relevant state legislation including, but not limited to, the legislation listed below, identified in the completed project Impacts & Hazards Risk Assessment and that nominated in specific environment/WHS/OHS (VIC) /OSH (WA) implementation sub-plans, SWMS and other EHS documentation as required.

State/Region	Principal Legislation	Authority	Internet Address
Commonwealth	Work Health and Safety Act 2011 Work Health and Safety Regulations 2011 Environment Protection and Biodiversity Conservation Act 1999 National Greenhouse and Energy Reporting Act 2007 Chain of Responsibility Heavy Vehicle Transport Laws 2014	Safe Work Australia Federal Safety Commissioner Department of the Environment Clean Energy Regulator National Heavy Vehicle Regulator	https://www.safeworkaustralia.gov.au/ www.fsc.gov.au https://www.environment.gov.au/epbc http://www.cleanenergyregulator.gov.au/NGER Heavy Vehicle Regulator
New South Wales	Work Health and Safety Act 2011 Work Health and Safety Regulation 2017 Protection of the Environment Operations Act 1997 POEO (Penalty Notices) Regulation 2004 POEO (Clean Air) Regulation 2010 POEO (Waste) Regulation 2014 Waste Avoidance and Resource Recovery Act 2001 Protection of the Environment Administration Act 1991 and Regulation 2012Environmental Planning and Assessment Act 1979 Water Management Act 2000 Water Act 1912 Heavy Vehicle National Law (NSW) 2018 No 42a Heavy Vehicle (Adoption of National Law) Act 2013 No 42 Heavy Vehicle (Adoption of National Law) Regulation 2013 Heavy Vehicle (Fatigue Management) National Regulation (NSW) Heavy Vehicle (General) National Regulation (NSW)	SafeWork NSW NSW EPA NSW Department of Planning, Industry and Environment Heavy Vehicle Regulator and RMS	http://www.safework.nsw.gov.au/ https://www.epa.nsw.gov.au/ https://www.dpie.nsw.gov.au/ Heavy Vehicle Regulator https://www.rms.nsw.gov.au/business-industry/examiners/vsccs/index.html

State/Region	Principal Legislation	Authority	Internet Address
	Heavy Vehicle (Mass, Dimension and Loading) National Regulation (NSW) Heavy Vehicle (Registration) National Regulation (NSW) Heavy Vehicle (Transitional) National Regulation (NSW) Heavy Vehicle (Vehicle Standards) National Regulation (NSW) Rail Safety National Law (NSW) No 82a Rail Safety (Adoption of National Law) Act 2012 No 82 Rail Safety National Law National Regulations 2012 Rail Safety (Adoption of National Law) Regulation 2018	ONSNR	https://www.onrsr.com.au/

Environmental Standards and Guidelines

Compliance standards, policies and guidelines relevant to the Project are detailed in the respective sub plans. The following standards and guidelines apply to the VCISD works.

Policy / Standard / Guideline	Application / Relevance to the Project
Construction Environmental Management Framework (CEMF)	Sydney Metro Project Construction Environmental Framework – to be applied to all Sydney Metro works
AS 2601 Demolition of structures	Specific demolition guidelines
Code of Practice – Demolition work, SafeWork NSW	Specific demolition guidelines
ISO 14,001 Environmental Management System – Requirements with Guidelines for Use	Principal Contractors are required to have a corporate Environmental Management System
Code of Practice - How to safely remove asbestos, WorkCover NSW	Asbestos removal
EPA Asbestos & Waste Tyre Guidelines 2014	Asbestos transport
AS 1940 The storage and handling of flammable and combustible liquids	Dangerous Goods and Hazardous Chemicals
Storing and handling liquids – Environmental Protection Participants Manual (DEEC 2007)	Dangerous Goods and Hazardous Chemicals
Environmental Compliance Report Liquid Chemical Storage, Handling and Spill Management, Part B – Review of best practice and regulations (DECC 2005)	Dangerous Goods and Hazardous Chemicals
Code of Practice – Managing noise and preventing hearing loss at work, SafeWork NSW	Noise/Vibration
AS 2670.2 Annex A Evaluation of human exposure to whole body vibration	Noise/Vibration
EPA Guidance Statement #8 – Environmental Noise (Draft)	Noise/Vibration
EPA Interim Construction Noise Guideline	Noise/Vibration

Code of Practice: Construction Hours/Noise within the Central Business District 1992 (City of Sydney)	Noise/Vibration
AS 2436-Guide to noise control on construction, maintenance and demolition sites	Noise/Vibration
AS 4282:1997 Control of the Obtrusive Effect of Outdoor Lighting	Outdoor Lighting
EPA Guidance Statement #18 – Prevention of air quality impacts from development sites	Dust, Odour & Fumes
National Environmental Protection Measure – (NEPM) Ambient Air Quality	Dust, Odour & Fumes
Urban erosion and sediment control field guide – BLUE BOOK (Department of Land and Water Conservation)	Erosion and Sediment Control
NSW Guidelines for construction sites 1998	Erosion and Sediment Control
Code of Practice – Excavation Work (WorkCover NSW)	Erosion and Sediment Control
Manual Managing Urban Stormwater – Soils and Construction 2008 (Department of Housing)	Stormwater Management
Planning Guidelines SEPP 55 – remediation of land	Land Contamination
NSW Government Resource Efficiency Policy 2014	Energy/Water /Waste Management
NSW Waste Classification Guidelines, 2014 (EPA)	Waste Management
AS 4361.2-1998: Guide to lead paint management, Part 2: Residential and commercial buildings	Lead Paint Management
Sydney Metro Requirement – Environment (SMR E)	Management Plans

TRANSPORT FOR NSW (TFNSW) AND SYDNEY METRO SPECIFIC PROCEDURES

TfNSW / Sydney Metro Procedure	Application / Relevance to the Project
City and Southwest Construction Noise and Vibration Strategy (SM-ST-210)	Principal Contractor to implement
Pre-Construction Minor Works Approval Form (SM ES-FT-415)	Principal Contractor to implement
City & Southwest Out-of-Hours Work Application Form (SM ES-FT-443)	Principal Contractor to implement
Environmental Incident Classification and Reporting Procedure (SM-17-00000096)	Principal Contractor to implement
Water Discharge and Reuse Procedure (SM ES-PW-309)	Principal Contractor to implement
Planning Approval Consistency Procedure (SM ES –PW-414)	Principal Contractor to implement
Environmental and Sustainability Policy (SM SE MM 102)	Principal Contractor to implement
Construction Environmental Management Framework (CEMF)	Principal Contractor to implement
Sydney Metro City and Southwest Sustainability Reporting Template (SME ES-FT-420)	Principal Contractor to implement

Where a Lendlease procedure exists, and is consistent with the listed TfNSW/Sydney Metro procedure, it may be used as the sole procedure.

Environmental Planning Approval

Sydney Metro City & Southwest was declared by Ministerial Order on 10 December 2015 to be State significant infrastructure and critical State significant infrastructure under Sections 115U(4) and 115V of the EP&A Act, respectively. The Ministerial Order also amended Schedule 5 of State Environmental Planning Policy (State and Regional Development) 2011 to include the project as Critical State Significant Infrastructure.

In May 2016, an Environmental Impact Statement for the Chatswood to Sydenham section of the Project (the EIS) was placed on public exhibition for a period of 48 days (six weeks). A Preferred Infrastructure Report on the Chatswood to Sydenham component (the PIR) was prepared and publicly released in October 2016. The Project was approved on 9 January 2017 (SSI 15_7400). In addition, Modification 1 to SSI 15_7400 was approved on 18 October 2017 to include relocation of the Victoria Cross northern entrance and services building from 194-196A Miller Street to a new location at 50 McLaren Street, North Sydney and provide a new lift only station access at this location. In addition, the Victoria Cross OSD - Stage 1 concept approval was granted on 18 December 2018, under SSD 8874. The Stage 2 detailed design is under assessment at the time of developing this plan.

Under Section 115ZG of the EP&A Act the following authorisations are not required for approved State Significant Infrastructure (SSI) (and accordingly the provisions of any Act that prohibit an activity without such an authority do not apply):

- The concurrence under Part 3 of the Coastal Protection Act 1979 of the Minister administering that Part of that Act
- A permit under section 201, 205 or 219 of the Fisheries Management Act 1994 An approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977
- An Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974
- An authorisation referred to in section 12 of the Native Vegetation Act 2003 (or under any Act repealed by that Act) to clear native vegetation or State protected land
- A bush fire safety authority under section 100B of the Rural Fires Act 1997
- A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.

In addition, Division 8 of Part 6 of the Heritage Act 1977 does not apply to prevent or interfere with the carrying out of approved SSI and the following directions, orders or notices cannot be made or given so as to prevent or interfere with the carrying out of approved critical SSI:

- An interim protection order (within the meaning of the National Parks and Wildlife Act 1974 or the Threatened Species Conservation Act 1995)
- An order under Division 1 (Stop work orders) of Part 6A of the National Parks and Wildlife Act 1974, Division 1 (Stop work orders) of Part 7 of the Threatened Species
- Conservation Act 1995 or Division 7 (Stop work orders) of Part 7A of the Fisheries Management Act 1994
- A remediation direction under Division 3 (Remediation directions) of Part 6A of the National Parks and Wildlife Act 1974 • An environment protection notice under Chapter 4 of the Protection of the Environment Operations Act 1997
- An order under section 124 of the Local Government Act 1993.

Environmental Approvals and Licensing Requirements

The key legislative and approval requirements for the MP ISD works are outlined in the table below.

Regulatory Authority	Approval / licence required for VCISD
Department of Planning and Environment (DPIE)	CSSI approval granted under Part 5.1 of the Environmental Planning and Assessment Act 1979 (EP&A Act). Approval of reports, studies and plans as required by the CSSI approval and REMM requirements,
Commonwealth Department of Environment	The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) prescribes the Commonwealth's role in environmental assessment, biodiversity conservation and the management of protected areas. Under the EPBC Act, matters of national environmental significance include world and national heritage properties and listed biodiversity impacts. The EIS concludes that the Project would not have a significant impact in relation to these matters. As such the Project is not a Controlled Action and does not require assessment and approval under the EPBC Act.
NSW Environment Protection Authority (EPA)	EPA administers Environmental Protection Licences (EPLs). The VCISD project is not considered a scheduled activity and therefore not required to be completed under an Environmental Protection License as required under the Protection of the Environmental Operation Act 1997 (POEO Act).
Roads and Maritime Services (RMS) and other road authorities	In accordance with the Roads Act 1993, VCISD will obtain the consent of the appropriate roads authority to erect a structure, carry out work in, on or over a public road, or dig up or disturb the surface of a public road. If the applicant is a public authority, the roads authority must consult with the applicant before deciding whether or not to grant consent or concurrence. As required, road occupancy permits will be sought in accordance with the Construction Traffic Management Plans.
Sydney Water	In accordance with the Sydney Water Act 1994, Lendlease will obtain prior approval to connect to the sewer.
North Sydney Council	Hoarding permits to enable installation of hoarding around the site perimeter will be sought through North Sydney Council.

APPENDIX 3 OBJECTIVES AND TARGETS (PROJECT)

FY20 Lendlease Building Performance Objectives	Performance Targets	Responsibility
LEAD INDICATORS i.e. the measurement of processes, activities and conditions that define specific performance and predict future results.		
Acute Risks Acute Risk Scenario Campaign has been completed in the past ninety days.	Quarterly	Construction Manager and/or designated person
High Risk Construction Work/High Risk Work Each Lendlease Foremen/Supervisors undertakes at least one Enablon App High Risk Construction Work (HRCW)/High Risk Work (HRW) inspection related to their area of oversight and related works.	Daily	Construction Manager and/or designated person
Site based Project Engineers/Other LL project personnel undertake at least 1 x Enablon App EHS Observation.	Observation Frequency Rate	Construction Manager and/or designated person
Actions All actions assigned to EHS observations /audits /incidents /acute risks are completed and closed out within the required time frame assigned.	Actions completed on time Actions not aging greater than 14 days	Project EHS Manager
Critical Incidents Are closed out within max. 30 days of the incident date.	Closed within 30 days	Construction Manager and/or designated person
Learning & Development **GMR training** completed by all employees (wages and salary) within 90 days of commencing work at *Lendlease*.	Greater than 95% completion	EH&S Manager
WHS legislation training is completed by all employees.	Greater than 95% completion	EH&S Manager
Chain of Responsibility (Heavy Vehicle National Law) awareness training is completed by Lendlease site based goods and services procurement personnel, site management and workers receiving/dispatching heavy vehicle loads.	Greater than 95% completion	EH&S Manager

FY20 Lendlease Building Performance Objectives	Performance Targets
LAG INDICATORS i.e. the measurement of processes linked to the outcomes of past events that provide data on past performance.	
Annual Critical incident frequency rate (CIFR) per million productivity hours.	≤1.0
Eliminate critical incidents with very large potential (multiple fatalities/single fatality member of public)	0.15

Eliminate ALL injuries to the public from construction operation activities or conditions.	0
Environment Incident Frequency Rate (EIFR).	≤2.0
Total Recordable Incident Frequency Rate (TRIFR).	≤9.00

APPENDIX 4 ORGANISATIONAL CHART

The Victoria Cross Project EHS Management Plan Organisation chart is located on the Lendlease share drive database:

T:\1. LLB\1. Station\I. Site Management\Org Charts and CV's

APPENDIX 5 EHS RESPONSIBILITY/ACCOUNTABILITY MATRIX

	Head of EHS Australia	EHS Manager Integrated Project	Project EHS Coordinator	Project Manager	Projecr Director (or nominated delegate)	Construction Manager (or nominated elegate)	Senior Construction Manager	Construction Manager	Project Engineer	Site Manager	Foreman/Supervisor	Subcontractor Principal	EHS Consultation Group	Construction Worker	First Aid	Environment Manager
EHS Management System	A	I	R	I		R			I	I	-	I	-	-	I	I
EHS Policy	R	I	I	I		I			I	I	I	I	I	I	I	
Project EHS Management Plan	-	A	C	I		R			I	I	I	I	I	I	I	C/I
PROA review	-	C	C	A/R		C			C	C	I	I	-	-	-	
EHS in Design	A	C	C	A		R			-	-	-	-	-	-	-	I
Chain of Responsibility (Heavy Vehicle National Law)	R	C	C	R		A			R	-	-	-	-	-	-	
Impacts & Hazards Risk Assessment	-	C	C	A		A/R			R	R	C	I	I	I	I	C
EHS Management Sub Plans	-	C	C	A		A/R			C	C	I	I	I	I	I	C
Legislation and Regulatory Changes	C	C	C	C		R			C	C	I	I	I	I	I	C
EHS Site Rules	-	C	C	-		A/R			C	C	C	I	I	I	I	C
LLB EHS Objectives & Targets	A	I	I	-		I			I	I	I	I	I	-	-	I
Project EHS Objectives and Targets & Initiatives	-	A	C	-		A/R			C	C	I	I	I	-	-	C
Workplace EHS Audit	-	-	C	-		A			-	-	-	-	-	-	-	C
Organisational Chart	-	-	-	-		A/R			C	C	I	I	I	-	-	
EHS Roles and Responsibilities	C	C	I	-		A/R			C	C	I	-	-	-	-	C
EHS Training Matrix	A	C	I	I		I			I	I	I	-	-	-	-	C
EHS Training Planner	-	A	C	-		R			I	C	I	-	-	-	-	C
LLB Safe Work Method Statements	-	C	C	-		I			R	C/A	C	-	-	-	-	
Subcontractor Safe Work Method Statements	-	C	C	-		-			A	C	C	R	-	-	-	
Worker Induction	-	C	R	-		A			-	-	-	-	-	-	-	
Visitor Induction	-	C	R	R		A			R	R	R	R	-	-	-	
EHS Consultation incl alerts, lessons learnt or other	-	C	C	-		A			I	I	I	I	R	I	-	C

	Head of EHS Australia	EHS Manager Integrated Project	Project EHS Coordinator	Project Manager	Projecr Director (or nominated delegate)	Construction Manager (or nominated elegate)	Senior Construction Manager	Construction Manager	Project Engineer	Site Manager	Foreman/Supervisor	Subcontractor Principal	EHS Consultation Group	Construction Worker	First Aid	Environment Manager
EHS Reporting	I	C	R	-		A			-	I	-	-	-	-	-	R
Emergency Management	-	A	I	-		R			I	I	I	I	I	I	I	C
Hazardous Substances and Safety Data Sheets	-	R	R	-		A			I	I	I	I	I	I	I	
Plant and Equipment	-	I	I			-C			-	A	R	A	-	-	-	
Permits to Work	-	C	C	-		-			-	A	-	R	-	-	-	
Daily High Risk Construction Work Checklist	-	I	I	-		I			I	R	R	-	-	-	-	
Subcontractor EHS Reporting	-	-	-	-		A			R	R	R	R	-	-	-	I
EHS Weekly Inspection	-	I	I	-		I			-	R	-	-	-	-	-	I
EHS Monthly Inspection	-	I	I	-		R			-	-	-	-	-	-	-	
Committee EHS Weekly Inspection	-	C	A	-		I			-	I	-	-	R	-	-	I
Subcontractor EHS&Q Audit & Schedule	-	I	I	-		A			R	R	R-	-	-	-	-	
Non-conformities and defects	-	C	C	-		A			R	R	R	R	-	-	-	C
Incident notification, investigation & reporting	-	A	C	-		A			R	R	R	R	I	I	-	
Site Diary	-	I	-	-		A			R	R	R	R	-	-	-	
Toolbox meetings	-	I	C	-		A			R	R	R	R	-	-	-	
Daily pre-start meetings	-	I	-	-		A			R	R	R	R	-	-	-	
Display EHS Information	-	A	A	-		R			-	-	-	-	-	-	-	
High Risk Construction Work/High Risk Work Licence Observations	-	-	-	-		A			-	A	R	-	-	-	-	R
EHS Monitoring / Calibration	-	R	R	-		A			R	R	-	-	-	-	-	
Injury Management	-	I	C	-		A			R	R	R	A/R	-	-	I	I
EHS System Audits	A	A/R	R	-		C			-	C	-	-	-	-	-	A/R
CSSI compliance				C	A	C	C	C		I						A/R
Main Environmental Representative Contact						C	C	C		C						A/R

R	**Responsible** The person who is assigned to do the work	A	**Accountable** The person who makes the final decision and has the ultimate ownership	C	**Consulted** The person who must be consulted before a decision or action is taken	I	**Informed** The person who must be informed that a decision or action has been taken

APPENDIX 6 ROLES AND RESPONSIBILITY STATEMENTS

Project specific Roles and Responsibility Position Descriptions are located within the projects share drive:

T:\1. LLB\1. Station\I. Site Management\Roles and Responsibilities

APPENDIX 7 CONSULTATION ARRANGEMENTS

Event	Frequency/Requirement	Participants	Record/Evidence
Workplace induction	Prior to commencing work at the workplace	All workplace employees and other workers. Visitors frequenting the workplace more than twice a month.	Induction records on Workplace Induction Register
Builder's Brief	Daily intervals including high risk construction work activities and interfacing work activities for the day, changes to emergency egress/ work areas, weather and other.	Issued to LLB and subcontractor supervisors	Builder's Brief Daily Record
Stand Down	At intervals to be determined by LLB incident trends, lessons learnt or other	LLB employees, subcontractors and all workers.	Stand Down Record
Pre-start	Daily intervals including Builder's Brief content, high risk construction work activities, high risk work requiring a licence and interfacing work activities for the day, changes to emergency egress/ work areas, weather and other; and When there is a new or changes to, or out of sequence, work tasks that are classified as high risk construction work.	Subcontractors and other workers including subcontractor foremen/supervisors.	Pre-start Record
Toolbox Talks	Subcontractor meeting as required discussing e.g. high risk construction work activities, changes to or out of sequence work tasks that are high risk construction work, alerts Lessons Learnt, Hazard Notices and incident s plus changes to legislation and codes of practice.	Subcontractors and other workers including subcontractor foremen/supervisors.	Toolbox Talk Record
Project Review meetings	At maximum six weekly intervals or as required including upcoming high risk construction work activities, critical and business reportable incident outcomes and lessons learnt and management of design or other changes with the potential to significantly affect environment, health and safety.	Project Manager, Construction Manager/Workplace Manager/ Service Providers/ Subcontractors, Client Representative and others.	Minutes of meeting
EHS Committee Meeting /	Monthly meetings as per constitution or other agreed consultative arrangements	Management representatives / employees, workers, Health & Safety Representative(s) (HSRs).	Notice board(s) Meeting minutes displayed including

Event	Frequency/Requirement	Participants	Record/Evidence
EHS Committee / EHS Consultation Group / HSR / Workgroup	inclusive of standard agenda item for upcoming high risk construction work activities.		upcoming high risk construction works. HSRs & Workgroups displayed EHS Committee / EHS Consultation Group members displayed LLB EHS Consultation Statement updated and displayed.
Issue Resolution	As EHS issues arise and are raised formally	Management representatives / employees, workers, Health & Safety Representative(s) (HSRs)	EHS Committee Minutes Confirm agreed EHS resolution process Agreed EHS Resolution Flow Chart displayed in the prominent locations.
Training	Commencement of project; and Annually in line with existing P4P and Skills Card processes	Lendlease salaried and award staff	Training planner

APPENDIX 8 PLANT, EQUIPMENT AND PROCESSES INSPECTION & TESTING SCHEDULE

Item	Inspection by	Australian standard/ Code	Inspection/Records/ Other Required
Atmospheric testing and monitoring equipment.	Competent Person	AS 2865	# Prior to each Confined Space entry, #Yearly. **Calibration of equipment required
Backhoe	Competent Person	Manufacturer Manual	#(D) Daily Pre-start, #250 hrs, #2,000 hrs (2 yearly) or maintenance as per manufacturer. (M) Mobile Plant Operator
® Building Maintenance Unit	Competent Person	AS1418.13	#Operation and maintenance instruction manual; #pre-operation check; # routine inspection checklist; #maintenance inspection in accordance with manufacturer's logbook. #High Risk Work Licence #GMR Independent Engineer Design Review
Concrete Line Pump ® Concrete Boom Pump	Competent Person	AS 1418.15 AS 2550.15	#(D) Daily Pre-start, #Monthly, #Yearly, #6 Yearly. #High Risk Work Licence
Concrete / Quick Cut Saw	*Competent Person	-	#Formal Operator Training, guarding # Maintenance as per the manufacturer
Confined Space	Competent Person	AS 2865	#Entry permit retained for 1 month, #risk assessment retained for 10 years, #training records for the term of employment. Permit To Work #High Risk Work Licence
Crane–mobile<10t ® Crane–mobile>10t ® Crane – Self Erecting ® Crane – Gantry >10t	Competent Person	AS 2550 AS 1418	#(D) Daily Pre-start, #monthly, #yearly, #10 yearly. (M) Mobile Plant Operator #High Risk Work Licence
® Crane–tower	#Competent Person	AS 2550 AS 1418	#(D) Daily Pre-start, #monthly, #yearly, #10 yearly. #High Risk Work Licence #Operators must provide evidence of formal VOC assessment against defined competency standards at three yearly intervals as well as the ticket/licence. #GMR Independent Engineer Design Review
Electrical – temporary switchboards and portable electrical equipment	Licensed Electrician	AS 3000 AS 3012 AS 3760	# LLB Electrical Equipment Inspection and Testing Procedure and Register or equivalent
Elevating work platforms ® Boom type EWP	Competent Person	AS 2550.10	#(D) Daily Pre-start, #3 Monthly, #yearly, #10 Yearly #High Risk Work Licence #(M) Mobile plant Operator

Item	Inspection by	Australian standard/ Code	Inspection/Records/ Other Required
Excavator	Competent Person	Manufacturer Manual	#(D) Daily Pre-start, #250 hrs, #2,000 hrs (2 yearly) or maintenance as per manufacturer. #(M)Mobile Plant Operator
Explosive Power Tool	Competent Person	AS 1873	#(D) Daily Pre-start to the manufacturer's recommendations dismantled and examined for defects weekly, #yearly by manufacturer.
Fire Fighting Equipment	Competent Person	AS 1851	Regular inspection, #6 monthly test; #Where more than 10 extinguishers are installed, details must be kept on a register.
Fixed platforms and stairs	Competent Person	AS 1657	Routine inspection.
Forklift Truck/ Telehandler/ Manitou/ motorised (self-propelled) Pallet Trolleys/ Lift Trucks	*Competent Person	AS 2359.2	#(D) Daily Pre-start, #250 hrs, #2,000 hrs (2 yearly) or maintenance as per manufacturer. #High Risk Work Licence (M)Mobile Plant Operator #Operators must provide evidence of formal VOC assessment against defined competency standards at three yearly intervals as well any ticket/licence/ competency attained.
Formwork	Competent Person	AS 3610	#Regular inspection (Stage 1 – before concrete placement); #Pre-poor checklist; #GMR Independent Engineer Design Review #Independent Engineer's Certificate prior to a pour; #Engineered Drawings for suspended formwork; #Independent Engineer certification back propping
Front End Loader	Competent Person	Manufacturer Manual	#(D) Daily Pre-start, #250 hrs, #2,000 hrs (2 yearly) or maintenance as per manufacturer. (M)Mobile Plant Operator
Hazardous Substance Dangerous Goods	Safety Precautions	Nat Standard NOHSC: 1005	#Risk Assessment; #Safety Data Sheet; #Register, training.
® Hoist (personnel and materials)	Competent Person	AS 2550.7 AS 1418	#(D) Daily Pre-start, #3 monthly, #yearly, #10 yearly. #High Risk Work Licence
Laser Level	Competent Person	AS 2211.1 AS 2397	Warning Signage; **calibration record.
Ladder	Competent Person	AS 1892.5	When purchased, each time before use, regular intervals. clearly labelled, e.g. safe working load & industrial use.

Item	Inspection by	Australian standard/ Code	Inspection/Records/ Other Required
® Lifts	Competent Person	AS1735.4	#Regular maintenance to manufacturer's specification #Yearly inspection and testing. #High Risk Work Licence (Hoist)
Lifting Gear Flat synthetic slings Fibre Rope slings Chains	Competent Person	AS1353.2 AS1380.2 AS3775	All gear: #Labelled, inspection prior to each use, test certificate to manufacturer's recommendations. #Lifting gear register record of monthly inspection. #Labelled, inspection prior to each use; #monthly, #12 monthly.
® Mast-climbing work platforms	Competent Person	AS1418.16 AS2550.16	#Pre-operation inspection before each use, #3 monthly maintenance inspection, #12 monthly full inspection/service; #major inspection 10 yearly & 5 yearly thereafter; #logbook each climbing drive unit; #logbook for checks, faults, repairs. #High Risk Work Licence #GMR Independent Engineer Design Review
Mobile Plant (All motorised self-propelled)	Competent Person		#(D) Daily Pre-start inspection and maintenance to manufacturer's requirements or Aust. Standards. #(M)Mobile Plant Operator
Oxy/Acetylene/Flashback arresters	Competent Person	AS 4332 AS4603 AS4289	Regular inspection and adequate separation and storage. # Flashback arrester 12 month test #Hoses, gauges and other reticulation items 6 monthly.
Personal Protective Equipment	Competent Person	Specific to type of PPE	# Register of Supply
Piling Rig	Competent Person	AS2550.1	#(D) Daily Pre-start, #monthly, #yearly, #10 yearly. #(M) Mobile Plant Operator #GMR Independent Engineer Design Review of foundation.
Rope Access	Competent Person	AS 4488	Visual Inspection before each use, # 6 monthly by Competent Person. Permit To Work #High Risk Work Licence
Roof safety mesh	Competent Person	AS 4389	#Record of inspection to ensure lapped and tied to Standard.
Safety Harness	Competent Person	AS 1891.4	Visual Inspection before each use, #6 monthly by competent person. #Permit To Work #High Risk Work Licence
Safety Lines/fall arrest devices, lanyards (installation)	Competent Person	AS 1891.4	Visual Inspection before each use, #3 monthly external checks, 6 monthly

Item	Inspection by	Australian standard/ Code	Inspection/Records/ Other Required
			inspections; #12 monthly full inspection/service. GMR Independent Engineer Design Review
Safe Work Method Statement High Risk Construction Work/High Risk Work requiring a licence	Competent Person	N/A	# Record of review by Competent Person # Training or Toolbox Talk Record. # Monitoring by principal contractor and subcontractor to ensure compliance. #Daily Observation by Lendlease Foreman/Supervisor
® Scaffolding	Competent Person	AS 1576 AS 4576	#Drawing/Elevations; #Handover Certificate, #monthly inspection, Scafftag #GMR Independent Engineer Design Review
Scissor Lift/Boom lift	Competent Person	AS 2550.10	#(D) Daily Pre-start, #3 Monthly, #yearly, #10 Yearly. # (M)Mobile Plant Operator
Skid steer Loader (Bobcat)	Competent Person	Manufacturer Manual	#(D) Daily Pre-start, #250 hrs, #2,000 hrs (2 yearly) or maintenance as per manufacturer. # (M)Mobile Plant Operator
Swinging Stage	Competent Person	AS1576 AS4576	#Handover Certificate, #daily pre-start; #monthly inspection. #High Risk Work Licence #GMR Independent Engineer Design Review
Traffic Control	Competent Person	AS 1742.3	#Traffic Management Plan (Approved) # High Risk Work Licence
® Work Box	Competent Person	AS1418.17	# Visual Inspection before each use Construction and welding inspection & load & stability test. #Yearly re-certification. See 'Lifting Gear'

Key:

® Means items of plant or equipment, which require registration of their design and/or the specific item of plant itself. Plant which requires 'item' registration, i.e. for the specific piece of plant which arrives at a construction project typically; includes: concrete pumps (boom type); mobile cranes > 10 tonnes SWL; tower cranes; air compressors, building maintenance units and boom type elevated work platforms.

Note: As at 1 July 2014 Victoria removed the legislative requirement for 'item' registration of specific high risk plant. Design registration of specific high risk plant is still required as denoted by ®

(#) Means records required.

(D) Means Daily prestart inspection required

** Means calibration of EHS measuring and testing equipment is required in accordance with the requirements of the LLB Calibration of Equipment for EHS Monitoring Procedure.

(M) **Mobile Plant Operator** means the Operator is required to evidence either i) a licence/certificate issued by a State/Territory; **OR** a Statement of Attainment /Certificate issued by an Registered Training Organisation; **OR** evidence of a formal Verification of Competency assessment against defined competency standards.

Note: See Tower Cranes and Forklift/Mobile Lift Trucks. In addition to any Licence/Ticket held by the Operator, the Operator must undertake additional Verification of Competency requirements at maximum 3 yearly intervals from the date of issue of their current qualification.

APPENDIX 9 OBJECTIVES AND TARGETS

The table below must be populated to determine the number of project/workplace personnel that are tasked with implementing the requirements of the objectives and targets outlined in Appendix 3.

Nominated Person(s)	Position	Objectives & Targets Task	Frequency
James Phippen Richard Craven	Construction Manager	An Acute Risk Scenario Campaign has been completed in the past ninety days across all active projects.	Quarterly
Matthew Dickens	Site Manager	High Risk Construction Work/High Risk Work Each Lendlease Foremen/Supervisors undertake at least one Enablon App High Risk Construction Work (HRCW)/High Risk Work (HRW) inspection related to their area of oversight and related works.	Daily
James Phippen Richard Craven	Construction Manager	Site based Project Engineers/Other LL project personnel undertake at least 1 x Enablon App EHS Observation.	Daily
James Phippen Richard Craven James Kennelly	Construction Manager and EH&S Manager	All actions assigned to EHS observations/audits/incidents/acute risks are completed and closed out within the required time frame assigned.	Following issue of action plan within Enablon
James Phippen Richard Craven James Kennelly	Construction Manager and EH&S Manager	Critical Incidents are closed out within max. 30 days of the incident date.	Within 30 days of Critical Incident occurring
James Kennelly	EHS Manager	Learning & Development GMR training completed by all employees (wages and salary) within 90 days of commencing work at Lendlease.	Monthly following release of GMR training status
James Kennelly	EHS Manager	WHS legislation training is completed by all employees including UX contracted superintendents.	Monthly following release of WHS Training status
James Kennelly	EHS Manager	Chain of Responsibility (Heavy Vehicle National Law) awareness training is completed by Lendlease site based goods and services procurement personnel, site management and workers receiving/dispatching heavy vehicle loads.	Monthly following CoR Awareness Training status

APPENDIX 10 SPECIAL CONDITIONS AND REQUIREMENTS

During the different stages of the project, works will be accessed for any requirement to comply with the Rail Safety National Law as defined under section 2.1.3 Greenfield and Brownfield sites under the National Rail safety regulator's "Guideline for identifying rail safety work under the RSNL. The risks and hazards associated with this work will be identified and managed through the project Impact Hazards and Risk Assessment (IHRA).

- The a project level risk workshop will be undertaken during the pre-construction phase of general construction activities identified through the Impacts hazards and Risk Assessments and in consultation with the key stakeholders.
- 1 month prior to key high risk construction work packages, Lendlease will arrange risk workshops with key stakeholders (Metro, Macquarie and subcontractors) facilitated by an EHS Professional. The workshops will use processes and tools outlined in Section 3.1.5 of this plan and the LLB EHS Risk Management Procedure. High Risk construction work Packages include (but are not limited to):
    - Excavation
    - Structure
    - Commissioning and Energisation
    - Fitout
- This Project EHS Management Plan and any supporting documentation from the Corporate Management System which are called up by this plan will be submitted to Sydney Metro for review.
    - Prior to commencement on site and
    - To demonstrate that they are ready to commence delivery in accordance with the Sydney Metro's Operational Readiness Review Checklist.
- Live electrical work is not permitted, except
    - with the prior written approval of the Lendlease Project Project Directors and LLB Head of EHS. Approval for live electrical work can only be given for reasons specified in Clause 157 (1) of the WHS Regulation 2017 or
    - Where it is necessary that electrical equipment is energised in order for testing and commissioning work to be carried out to the requirements of AS 3000, AS 4836, the Code of Practice For Safe Electrical Work Low Voltage Installations, and the Lendlease GMRs and LLB Workplace Delivery Code
- Where electrical work will be required in the vicinity of, or on High Voltage Electrical Infrastructure, the subcontractor must develop procedures in accordance with the Electrical Distribution Authority's Standards and Rules.
- A safe Approach Distance from live electrical equipment of 3m for Ordinary Persons will be maintained by the use of fencing where work is preformed on electrical equipment with bare live components, and the equipment is not located in electrical rooms or cupboards which remain restricted to Accredited Persons only.
- Work near overhead services will be undertaken under the conditions of the project specific Work near Overhead Assets Or Power Lines Permit maintained in the site filing.

CLIENT SPECIFICATIONS/ REQUIREMENTS

The following is a summary of the measures, controls, and commitments that have been defined by the Client. Unless otherwise stated the Sections relate to the VCISD EHS Management Plan

4.1	Project Health & Safety Management Plan (PHSMP)	Entire document
4.1.1	PHSMP Operational Readiness Review	Section 1.2 and App 10
4.1.2	PHSMP Annual Review	Section 1.2
5.1	Company Officers	Section 4.1 and App 4
5.2	Leadership and Culture	Section 1.2, SLT Culture Charter and GMR 3.3.3
5.2.1	Safety Leadership Meeting	Section 1.2, SLT Culture Charter and GMR 3.3.3
5.3	Resources	GMR 1.1.1 Table 1, GMR 3.1.3, GMR 4.0
5.3.1	Health & Safety Resources	GMR 1.1.1 Table 1
5.3.2	Supervisory Levels and Competency	GMR 1.1.1 Table 1
6.1	Health & Safety Planning	Section 3.1
6.1.1	Health & Safety Performance Index	Section 3.4.2 and Information provided in the monthly report, which includes: • WHS Monthly Reporting (including HSPI) • OHHW Information Management System • Heavy Vehicle Compliance tracker (not including SMIC)
7.1	General Health & Safety Risk Management Requirements	Section 3.1, GMR and WDC
7.2	Risk Assessment and Control	Section 3.1 and EHS Risk Management Procedure
7.2.1	Project Level Risk Assessment	Section 3.1 and EHS Risk Management Procedure
7.2.3	Task/Work Method Level Risk Assessments	Section 3.1 and EHS Risk Management Procedure
7.3	Safety in Design	Section 3.1 and EHS Risk Management Procedure
8	Training & Competence	Section 4.2 and WDC
9	Communication and Consultation	Section 4.3, App 7 and the Consultation Procedure
9.1	Pre-Work Briefings	Section 4.3.3
9.2	Toolbox Talks	Section 4.3.3
9.3	Safety Alerts, Lessons Learnt and Bulletins	App 7 and Incident Investigation Procedure
9.4	Health and Safety Committee Meetings	Section 4.3, App 7 and the Consultation Procedure
9.5	Communication and Consultation on H&S across languages	Section 4.3.3
10.1	H&S Reporting to Sydney Metro	Section 4.3.4
10.2	Reporting to External Parties	Section 4.3.4
11.1	Work at Height	GMR 4.1, WDC Work at Heights and Site Rules
11.1.1	Use of Ladders for Access/Egress	Project IHRA and WDC
11.1.2	Falling objects	Project IHRA, GMR 4.2 and WDC
11.2.1	Temporary Works (General Requirements)	Project IHRA, GMR 4.9, WDC and Temporary Works Register CSWSMP-

		MAC-SMP-EN-REG-999901 and Flow Chart
11.3	Scaffolding	Project IHRA, GMR 4.9 & WDC
11.4	Formwork and Falsework	Project IHRA, GMR 4.9, WDC and Site Rules
11.5	Cranes and Load Shifting	Project IHRA, GMR 4.6, WDC, Site Rules and Slinging and Lifting Guide
11.5.1	Tower Crane s	Project IHRA, GMR 4.6, WDC and Slinging and Lifting Guide
11.6	Piling	Project IHRA and WDC
11.7	Demolition	Project IHRA and WDC
11.8	Explosives	Not applicable (not being used)
11.9.1	Excavation Work	Project IHRA, GMR 4.3 & WDC
11.9.2	Tunnelling	Project IHRA, GMR 4.9 & WDC
11.10	Electrical Safety	Project IHRA, GMR 4.16 & WDC
11.10.1	Electrical Work	Project IHRA, GMR 4.4 & WDC
11.10.2	Overhead Services	Project IHRA, WDC and GMR 4.4, 4.15
11.10.3	Underground/Buried Services	Project IHRA, WDC and GMR 4.4, 4.15
11.11	Confined Spaces	Project IHRA, WDC and GMR 4.19
11.12	Hot Work	Project IHRA, WDC and GMR 4.5
11.13	Chemical Management	Project IHRA, WDC and GMR 4.10
11.14	Occupational Health Hygiene and Well being	MMP OHHW Plan
11.14.1	Occupational Health & Hygiene Program	MMP OHHW Plan
11.14.2	Health Risk Assessment	MMP OHHW Plan
11.14.3	Asbestos Control	Project IHRA, WDC and GMR 4.10
11.14.4	Risk of Importation of Asbestos Containing Materials	Project IHRA and WDC .
11.14.5	Ventilations in Tunnels and Enclosed Areas	Project IHRA App 10, (MMP LLE Tunnel Procedure to be developed)
11.14.6	Respirable Crystalline Silica Control	MMP OHHW Plan
11.14.7	Diesel Exhaust Emissions Control	MMP OHHW Plan
11.14.8	Thermal Heat Stress Risk Control	MMP OHHW Plan
11.14.9	Contaminated Ground	Project IHRA, WDC and GMR 4.4, 4.15
11.14.10	Noise	Project IHRA, WDC and GMR 4.13
11.14.11	Psychosocial Hazards	Project IHRA and MMP OHHW Plan
11.14.12	PPE Programs	Project IHRA, Section 8.7 and MMP OHHW Plan
11.14.14	OHHW Training Program	MMP OHHW Plan
11.14.15	Medical Examination and Health Monitoring Program	MMP OHHW Plan
11.14.16	OHHW Key Performance Indicators	MMP OHHW Plan
11.14.17	OHHW Performance Reporting	MMP OHHW Plan
11.14.18	OHHW Performance Review	MMP OHHW Plan
11.15	Hazardous Manual Tasks	Project IHRA and WDC
11.16	Work Related Road Safety	Chain of Responsibility Sub Plan
11.16.1	Vehicle Drivers	Chain of Responsibility Sub Plan
11.16.2	Minimum Vehicle Safety Equipment	Chain of Responsibility Sub Plan
11.16.3	Vehicle Registration, Maintenance and Inspection	Chain of Responsibility Sub Plan
11.17	Heavy Vehicles Safety and Compliance	Chain of Responsibility Sub Plan
11.17.2	Heavy Vehicle Operators	Chain of Responsibility Sub Plan
11.17.3	Haulage Route Compliance	Chain of Responsibility Sub Plan
11.17.4	Heavy Vehicle Safety Requirements	Chain of Responsibility Sub Plan
11.17.6	Heavy Vehicle Driver Training	Chain of Responsibility Sub Plan

11.18	Working In and Around Live Traffic	Traffic Management Plan
11.18.1	Work around Construction Traffic / Mobile Plant	Traffic Management Plan
11.19	Plant and Equipment	Section 5.2.4, WDC, GMR and Site Rules
11.19.1	Plant Specific Requirements	Section 5.2.4, WDC, GMR and Site Rules
11.19.2	Hand Tools	Project IHRA
11.19.3	Power Tools	Project IHRA and WDC
11.20	Work In and Around Water	Project IHRA, WDC and GMR 4.18
11.21	Work Conducted in the Vicinity of Aerodromes	Not applicable
11.22	Remote or Isolated Work	Project IHRA, GMR and WDC
11.23	Night Work	Project IHRA GMR, WDC and MMP OHHW Plan
11.24	Welfare Facilities	Project IHRA, GMR 3.1 and WDC
11.25	Lock-out/Tag-Out	Project IHRA, Permit Procedure and WDC
11.26	Permits to Work	Section 4.5.1, Permit Procedure and WDC
11.27	Permit to Work – Tunnelling	Referenced App 10, (MMP LLE Tunnel Procedure to be developed)
11.28	Safety Signage	Project IHRA, GMR 3.2, WDC and LL Site Signage Guideline
12	Rail Safety	Not applicable at present and it will be assessed and included if required
12.1	Rail Safety Risks	Not applicable at present and it will be assessed and included if required
12.2	Rail Safety Worker Requirements	Competence Management Plan
12.2.1	Competence and Induction	Competence Management Plan section 4.0 Engineering Job Roles
12.3	Project Work Notification	Not applicable at present and it will be assessed and included if required
12.5	Worksite Protection	Not applicable at present and it will be assessed and included if required
12.5.1	Temporary Fencing and Hoardings in the Rail Corridor	Not applicable at present and it will be assessed and included if required
12.6	Mobile Plant in the Rail Corridor	Not applicable at present and it will be assessed and included if required
12.6.1	Road Rail Plant and Track Machines	Not applicable at present and it will be assessed and included if required
12.7	Working Around Electrical Infrastructure in relation to rail	Not applicable at present and it will be assessed and included if required
12.7.1	Planning Work Around Electrical Infrastructure in relation to rail	Not applicable at present and it will be assessed and included if required
12.7.2	Work Conducted around Underground Electrical Assets in relation to rail	Not applicable at present and it will be assessed and included if required
12.8	Underground Services	Not applicable at present and it will be assessed and included if required
12.9	Protection of Infrastructure from Damage in relation to rail	Not applicable at present and it will be assessed and included if required
12.10	Emergency/Incident Planning Response & Reporting	Section 9 is this in the ERP
13.1	Alcohol and Other Drugs	MMP OHHW Plan
13.1.1	Definitions	MMP OHHW Plan
13.1.2	Testing	MMP OHHW Plan

13.1.3	Employee Assistance	MMP OHHW Plan
13.1.4	Notification	MMP OHHW Plan
13.2	Fatigue Management	MMP OHHW Plan
13.2.1	Fatigue Minimisation for Other Safety Critical Roles	MMP OHHW Plan
13.3	Health Assessment	MMP OHHW Plan
13.3.1	Health Assessment for Rail Safety Workers	MMP OHHW Plan
14	PPE	Section 3.3, GMR 3.2.5, WDC and Site Rule
15	Site Security & Access Control	MMP Security Management Plan, GMR 3.2.3
16	Interface Management	MMP Interface Management Plan
17	Management of Change	Sections 3.1.4.2 and 4.5.3, and the LLB Change Management Procedure
18	Configuration Control Board	Sections 3.1.4.2 and 4.5.3, and the LLB Change Management Procedure
19	Asset Management	Sections 3.1.4.2 and 4.5.3, and the LLB Change Management Procedure
20	Safety in Procurement	Sections 3.6, 4.2.3, 4.5.1, 4.5.2 and 5.1
20.1	Subcontractor Safety Management Plan	Section 4.5
20.2	Control of Subcontractors	Section 5.1
21.1	Systems Engineering	Technical Management Plan Section 13.0 System Engineering
21.2	Reliability Availability and Maintainability	Ram Plan Whole Plan
22	Safety Assurance	Not applicable at present and it will be assessed and included if required
22.1	Independent Safety Assessment	Not applicable at present and it will be assessed and included if required
24	Incident, Emergency and Crisis Management	Sections 9 & 15
24.1	Minimum Requirements for Management Plans	Section 4.6 and the Emergency Response Control Sub Plan
24.2	First Aid Requirements	Section 4.3, App 5, Project IHRA and WDC
24.3	Site Emergency Co-ordinators	Emergency Response Control Sub Plan
24.4	Simulated Emergency Exercises	Section 4.6 and the Emergency Response Control Sub Plan
25	Incident Reporting & Investigation	Section 4.3.4 and 5.4.1, and Incident Investigation Procedure
25.1	Incident Notification & Reporting	Section 4.3.4 and 5.4.1, and Incident Investigation Procedure
25.1.1	Notification to Regulators	Section 4.3.4 and Incident Investigation Procedure
25.2	Incident Investigation	Section 5.4.1, and Incident Investigation Procedure
25.2.1	Submitting Investigation Reports	Section 5.4.1, and Incident Investigation Procedure
25.2.2	Corrective & Preventative Action	Section 5.3
26	Corrective Action Management	Section 5.3 and 5.4
27	Injury Management & Return to Work	Section 5.4.2
28.1	Inspections	Section 5.1
28.2	Audits	Section 1.2 and the EHS Audit Procedure
28.3	Compliance Working Group	Section 5.1

APPENDIX 11 SYDNEY METRO PROJECT PLANNING BACKGROUND

Sydney Metro Project Background

The New South Wales (NSW) Government through Transport for NSW (TfNSW) is implementing Sydney's Rail Future, a plan to transform and modernise Sydney's rail network so that it can grow with the city's population and meet the needs of commuters and customers in the future.

Sydney Metro is a new standalone rail network identified in Sydney's Rail Future. The Sydney Metro network consists of Sydney Metro Northwest (previously known as the North West Rail Link), Sydney Metro City & Southwest and Sydney Metro West. The works completed under this EHS MP will form part of the Sydney Metro City & Southwest (SMC&SW), which comprises of two core components:

- The Chatswood to Sydenham project involves the construction and operation of an underground rail line approximately 15.5 kilometers long inclusive of new stations between Chatswood and Sydenham.
- The second core component will involve upgrading the 13.5 kilometre rail line and existing stations from Sydenham to Bankstown.

Victoria Cross Integrated Station Development Planning Approval

The Victoria Cross Integrated Station Development (ISD) comprises of the new Victoria Cross Metro Station including a northern services building, and Over Station Development (OSD) consisting of a south tower, and is outlined below. The Victoria Cross Metro Station works will be completed as part of the Critical State Significant Infrastructure (CSSI) project (reference SSI 7400), and as approved by SSI 7400 MOD 3. The south tower OSD works will be completed under a separate State Significant Development (SSD) approval. Victoria Cross OSD - Stage 1 concept approval was granted on 18 December 2018, under SSD 8874. The Stage 2 detailed design is under assessment at the time of developing this plan

Victoria Cross Station CSSI Modification

The Victoria Cross modification involved the relocation of the northern station services building approved as part of the Victoria Cross metro station from 194 and 196A Miller Street, North Sydney to 50 McLaren Street, North Sydney. A new northern station entry would be integrated within the northern services building at the same location. The Victoria Cross Station modification has been developed to reduce environmental impacts, to extend the Victoria Cross Station catchment, to improve the customer experience and to improve access to the McLaren Street precinct and northern catchment of North Sydney.

While Victoria Cross Station and the OSD will form an integrated development, the planning pathways defined under the Environmental Planning & Assessment Act 1979 require separate approval for each component of the development. In this regard, the approved station works (CSSI Approval) are subject to the provisions of Part 5.1 of the EP&A Act (now referred to as Division 5.2) and the OSD component is subject to the provisions of Part 4 of the EP&A Act.

For clarity, the approved station works under the CSSI Approval included the construction of below and above ground structures necessary for delivering the station and also enabling construction of the integrated OSD. This includes but is not limited to:

- demolition of existing development (completed by others, not assessed under this plan)
- excavation (completed by others, not assessed under this plan)
- integrated station and OSD structure (including concourse and platforms)
- lobbies
- retail spaces within the station building
- public domain improvements
- pedestrian through-site link
- access arrangements including vertical transport such as escalators and lifts
- space provisioning and service elements necessary to enable the future development of the OSD, such

as lift cores, plant rooms, access, parking, retail, utilities connections and building services.

The vertical extent of the approved station works above ground level is defined by the 'transfer level', above which would sit the OSD. This delineation is illustrated below;

Figure - Schematic 3D View of the ISD Showing OSD and Station Components. Note: Northern (McLaren Street) station entrance shown on left, Southern (Berry Street) entrance shown on right.

The CSSI Approval also establishes the general concept for the ground plane of Victoria Cross Station including access strategies for commuters, pedestrians, workers, visitors and residents. All associated public domain improvement works around the site would be delivered as part of the CSSI Approval. An artist's impression of Victoria Cross Station (Southern Site), is shown below.

Figure - Artistic Impression of Victoria Cross Station (Southern Site)

APPENDIX 12 COMMUNITY, GOVERNMENT AGENCY AND EXTERNAL STAKEHOLDERS

Community Communication and Consultation

Lendlease shall ensure that all relevant community stakeholders are consulted at appropriate times during the implementation of the Project. This will be detailed in the project Community Communications Strategy (CCS) and Business Management Plan (BMP).

Specific actions will ensure that community members have adequate opportunity to be informed and provide into items that may impact them. i.e. noise impacts and proposed mitigation measures and environmental impacts. Specific actions shall include:

- Issuing of community updates/newsletter and/or notifications;
- Advertising of activity timetables in local papers;
- Making documents detailed in the Planning Approval publicly available;
- Publicising a general toll free project contact number prior to construction; and
- Responding to community enquiries and complaints about the project using the web based contact management system provide by the client, and ensuring that all enquiries and complaints are dealt with promptly and properly addressed.

All communication with the local community will be undertaken in accordance with the CCS, which will:

- Demonstrate how the community consultation requirements of the project will be delivered
- Identify people and organisations to be consulted during the project
- Describe the overall approach that will be taken when dealing with the community and other stakeholder groups, including identification of opportunities to provide accessible information regarding the project
- Outline the methods that will be used to inform the community about the project and upcoming works, including provision of community forums.
- Set out procedures and mechanisms:
    - through which the community can discuss or provide feedback
    - through which lendlease will respond to enquiries or feedback from the community
    - to resolve any issues and mediate any disputes that may arise in relation to environmental management and delivery of the project.

Key community groups include local businesses, residents and interest groups (environmental and commercial). Information prepared for distribution to the community will be tailored to the needs of the target group and approved by the Sydney Metro prior to release. It may address project progress, traffic disruptions and controls, temporary detours, work outside normal hours and may be provided through various forms including:

- As a community notice;
- As advertisements (e.g. progress updates, road closures, disruption to traffic);
- Newsletters;
- Brochures;
- On the internet; and / or
- On noticeboards.

Please refer to the Lendlease Community Communication Strategy, for all aspects and further detail relating to community management for the project.

Management of complaints is detailed within the VCISD Community Communications Strategy (CCS), and outlined below.

Complaints may be received directly by members of the project team or indirectly via Sydney Metro's Community Information Line, postal address and email address. Senior members from the project team will be on call to receive complaints at all times and will manage all phone complaints outside of business hours. This responsibility will be managed and shared between project team members on a rostered basis. Complaints will be managed in accordance with the Sydney Metro Construction Complaints Management System (CCMS) and Sydney Metro Overarching Community Communications Strategy (OCCS). This includes resolving complaints to the satisfaction of all stakeholders or escalating complaints to Sydney Metro or the Community Complaints Commissioner.

The procedures for responding to complaints will be covered in the project induction for all staff and contractors.

All complaints will be dealt with in a responsive and efficient manner to ensure that stakeholders see their concerns are being managed effectively and promptly. Complaints will be responded to in the following way:

- After receiving a complaint, it is immediately investigated
- If it does not relate to VCISD work, the complaint is given to Sydney Metro
- An initial call is made to the complainant within 2 hours (if the complaint is received by phone or where a telephone number was provided). Alternatively, a written response is provided within 24 hours.
- The complainant is kept informed of the process until the complaint is resolved
- Actions are taken and measures implemented to prevent the reoccurrence of the complaint
- The complaint is closed out within an agreed timeframe (agreed with complainant)
- Complaints that cannot be resolved are escalated to Sydney Metro or the Community Complaints Commissioner to resolve. We will comply with any directions from Sydney Metro which may incorporate recommendations from the Community Complaints Commissioner in relation to resolving escalated complaints
- All complaints are reported to Sydney Metro daily
- All complaints are recorded on the Consultation Manager database

Government Agencies and External Stakeholders

Consultation with a range of non-community, external stakeholders will be required throughout the project. Lendlease will consult and co-operate with all relevant regulatory agencies in meeting the Project environmental requirements and will permit those agencies to audit project activities for regulatory compliance. Initially the CSSI approval requires Lendlease to consult with specific authorities and stakeholders in the preparation of this EHS MP and associated sub plans. Appendix 1.1 indicates approval required (A), endorsement required (E), consultation (C) and submit for information (I) required by the CSSI approval for the various documents.

External stakeholders include TfNSW/Sydney Metro, Department of Planning and Environment (DPIE), EPA, OEH, Heritage NSW, Heritage Council, NRAR, Roads and Maritime Services, Sydney Coordination Office, Sydney Trains, North Sydney Council, Members of Public (Community), other relevant third party agencies, Government authorities and organisations. External communication methods include:

- Site meetings with Sydney Metro;
- All significant incidents notified to Sydney Metro and ER/Approving Authority;

- Meetings and correspondence with interested parties (e.g. North Sydney Council, EPA, bus & coach operators, taxi operators, NSW Police, NSW Fire & Rescue, NSW Ambulance Service and other key stakeholders) as necessary; and
- Discussions with adjoining land owners / neighbours and the community who may be affected by the project in accordance with the Community Consultation Strategy (CCS).

An up-to-date list of emergency response personnel and relevant organisations (emergency services, EPA, etc.) will also be maintained at the main office and site compounds, for any potential environmental incident reporting and management required to be undertaken in accordance with this plan. A list of relevant contacts for project stakeholders will be maintained by the Environmental Manager and the Community and Stakeholder Manager on site.

APPENDIX 13 NOTIFIABLE ENVIRONMENTAL INCIDENTS

All environmental incidents will be managed as per the Lendlease Incident Reporting and Management Procedure.

In addition to the standard definitions and notification requirements in the Lendlease Incident Reporting and Management Procedure, the following project specific environmental incident definition and notifications are required;

- immediate notification will be provided to Sydney Metro by telephone initially and followed up in writing within 48 hours, of any breach, potential breach, non-compliance or potential non-compliance with the CSSI conditions of approval, requirements of any of the environmental documents or relevant legislation. The ER will be immediately notified of any such incidents and review notification of incidents in accordance with MCoA A41. The AA will be notified of noise and vibration incidents and will review notification of these incidents in accordance with MCoA A41.
- DPIE notification requirements are outlined in CSSI approval A41-A44 as tabulated below. Any incidents meeting this definition will be notified to the Secretary in accordance with these requirements. Sydney Metro will undertake the notification to DPIE based on information/notification from Lendlease.

CSSI approval	Requirement
A41	The Secretary must be notified as soon as possible and in any event within 24 hours of any incident. *Note: An incident in regards to this condition is defined as an occurrence or set of circumstances that causes, or threatens to cause, material harm to the environment, community or any member of the community, being actual or potential harm to the health or safety of human beings or to threatened species, endangered ecological communities or ecosystems that is not trivial*
A42	Notification of an incident under Condition A41 of this approval must include the time and date of the incident, details of the incident and must identify any non-compliance with this approval.
A43	Any requirements of the Secretary or Relevant Public Authority (as determined by the Secretary) to address the cause or impact of an incident reported in accordance with Condition A41 of this approval, must be met within the timeframe determined by the Secretary or relevant public authority.
A44	If statutory notification is given to the EPA as required under the POEO Act in relation to the CSSI, such notification must also be provided to the Secretary for information within 24 hours after the notification was given to the EPA.

- The EPA must be notified immediately of all pollution incidents that cause or threaten material harm to the environment.

  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 Environment and Sustainability 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 Construction Health and Safety Management Plan.

  The EPA Environment Line is to be contacted on 131 555.

  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)
- SafeWork NSW (13 10 50)
- North Sydney Council – (02) 9936 8100
- Fire and Rescue NSW on 000

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.

APPENDIX 14 CONSTRUCTION HOURS

In accordance with CSSI approval E36; Construction, except as allowed by Condition E48 (excluding cut and cover tunnelling), must only be undertaken during the following standard construction hours:

- 7:00am to 6:00pm Mondays to Fridays, inclusive;
- 8:00am to 1:00pm Saturdays; and
- at no time on Sundays or public holidays.

CSSI approval E37 places further restriction on the hours that 'high noise impact' generating activities may occur. Construction works and activities with the potential to generate high noise impact will be scheduled to occur between the hours of 7am to 8pm, unless otherwise approved. CSSI approval E38 provides for an extended daytime period as it may be preferred by commercial (or residential) receivers for high noise generating activities to occur after 5pm. As required in CSSI approval E38, the relevant receivers have been identified throughout the Construction Noise and Vibration Management Plan (CNVMP) regarding the determination of hours of respite so that construction noise (including ground-borne noise) does not exceed the Highly Noise Affected Management Level (HNAML) outlined within the Interim Construction Noise Guideline (ICNG).

Out of Hours Works and Associated Protocol

CSSI approval E44(f) and E47 requires the preparation of an OOHW Protocol when undertaking works outside of standard construction hours. All out of hours works, except in circumstances consistent with E44 a-e or after consultation with affected receivers as required by E37 and E38, will be managed under the Sydney Metro Out of Hours Works Protocol (Reference Document: SM ES-PW-317) which is located on the Sydney Metro website and will be referred to during the assessment, management and approval of work outside of standard construction hours (as defined in Condition of Approval E36).

Condition E48 specifies that the following activities may occur 24 hours per day seven days a week, subject to Condition E47:

- tunnelling and associated support activities (excluding cut and cover tunnelling);
- excavation within an acoustic enclosure;
- station and tunnel fit out; and
- haulage and delivery of spoil and materials.

APPENDIX 15 ENVIRONMENTAL MONITORING

Environmental Monitoring Programs

Environmental monitoring will involve collecting and interpreting data to provide quantification of the effectiveness of the EHS Plan and sub plans. As required under CSSI approval C9, Construction Monitoring Programs are required to be prepared in consultation with the relevant government agencies. As per the Staging Report the following construction monitoring programs will be implemented for the VCISD works.

- A Construction Noise and Vibration Monitoring Program is incorporated within the Construction Noise and Vibration Management Plan (CNVMP) and includes provision of 'realtime' noise and vibration monitoring. This program has been developed in compliance with CSSI approval C11 with all 'realtime' noise and vibration monitoring data being made available to DPIE, EPA, the construction team, Sydney Metro, ER and AA.
- A Groundwater Monitoring Program is incorporated within the Construction Groundwater Management Plan (CGMP) and includes provisions to undertake monitoring of groundwater.

It is noted that 'Blasting' (a feature of the broader Sydney Metro City and Southwest project) is not required for the VCISD works and as a result a construction monitoring program not required. Also, in accordance with the Staging Report, negligible impact to surface water is anticipated and as such, an associated monitoring program has not been developed. This aspects will be managed by the site environmental management, inspection and auditing procedures.

The timing, frequency, methodology, locations and responsibilities for the proposed environmental monitoring programs are specified in the respective sub plans. The monitoring programs range from those involving formal sample collection, analysis and measurement, to those involving a more qualitative assessment.

Irrespective of the type of monitoring conducted, the results will be used to identify potential or actual problems arising from construction processes. Where monitoring methods permit, results will be obtained at the time of the assessment and analysed immediately by the Environmental Manager (or delegate) or EHS Coordinator. This will allow a prompt response to be initiated should an exceedance of accepted levels/criteria be identified.

Where this cannot be achieved, preliminary results will be requested as soon as possible following the monitoring episode with a full report to follow.

Where a non-conformance is detected or monitoring results are outside of the expected range, the process described in this plan will be implemented, which would include:

- The results will be analysed by the Environment Manager (or delegate) or EHS Coordinator in more detail with the view of determining possible causes for the non-conformance;
- A site inspection will be undertaken by the Environmental Manager (or delegate) or EHS Coordinator;
- Relevant personnel will be contacted and advised of the problem. This will include notification to the ER and the AA (where relevant);
- An agreed action will be identified; or
- Action will be implemented to rectify the problem.

Environmental Representative and Acoustic Advisor Inspections

Inspections by the Environmental Representative and Acoustic Advisor are dependent on the level of environmental risk of construction activity being completed. This frequency will be discussed and agreed between the ER, AA, Sydney Metro and Lendlease prior to works commencing.

It is anticipated that ER inspections will typically occur monthly but may be more or less frequent dependent on environmental risk of the project stage, at the discretion of the ER in consultation with Lendlease and Sydney Metro.

AA inspections will be completed on an ‘as-needs’ basis, in consultation with the AA.

DPIE Compliance Inspections

DPIE may undertake site compliance inspections on a case-by case basis, as requested by DPIE.

APPENDIX 16 CSSI COMPLIANCE AUDITING

External Environmental Audits

External audits may be conducted by Sydney Metro and Independent Environmental Auditor. The ER will audit if requested by DPIE. The outcomes of any audit, if reported to Lendlease, will be documented. Corrective Action Requests (CAR) and Observations of Concern (OOC) will be addressed through the same mechanisms as non-conformances. Resolution of CARs and OOCs will be documented and filed with the Audit Report.

As required by CSSI approval A37, an Environmental Audit Program for independent annual environmental auditing against the terms of the planning approval must be prepared. Sydney Metro have developed and submitted this program to DPIE previously. The Lendlease Environment Manager will participate in the program where required. The ER and AA will be invited to all external audits.

CSSI Compliance Reporting

Reports on compliance with the planning approval or any other statutory requirements will be submitted to Sydney Metro by the Environmental Manager for inclusion in the Pre-Construction Compliance Report (CSSI approval A31), and ongoing Construction Compliance Reports prepared by Sydney Metro, endorsed by the ER and submitted by Sydney Metro to the Secretary for information on a quarterly basis. The Reports will include:

- a results summary and analysis of environmental monitoring;
- the number of any complaints received, including a summary of main areas of complaint, action taken, response given and proposed strategies for reducing the recurrence of such complaints;
- details of any review of, and minor amendments made to, the EHS MP as a result of construction carried out during the reporting period;
- a register of any consistency assessments undertaken and their status;
- results of any independent environmental audits and details of any actions taken in response to the recommendations of an audit;
- a summary of all incidents notified in accordance with Condition A41 and Condition A44 of this approval; and
- any other matter relating to compliance with the terms of this approval or as requested by the Secretary.

The Compliance Tracking Reports will be provided to the Environmental Representative for endorsement.

Internal compliance audits will include review compliance with the aspects of the EHS Plan, EIS, PIR and CEMF.

Any non-compliances or actions raised in environmental audits or CSSI compliance reporting will be managed as per Sections 5.3 and 5.4 of this plan and the Lendlease - Auditing EHS Procedure.

Rectifying Non-Compliance with the CSSI planning approval

Non-conformances to the CSSI planning approval will be resolved in accordance with Sections 5.3 and 5.4 of this plan, the Lendlease - Auditing EHS Procedure and in consultation with the ER and Sydney Metro. Environmental non-compliance reports will be issued to the ER and Sydney Metro within 48 hours of identification. In the event of such a non-conformance:

- The nature of the event will be investigated by the Environmental Manager;
- Advice may be sought from a specialist;
- Monitoring may be undertaken;
- The effectiveness or need for new/additional controls will be reviewed by the Environment Manager (or delegated persons) who if required, will assign appropriate person/s with preventative and corrective

actions to be closed out according to set time frames. The time frames will be set on the potential magnitude and likelihood of the environmental risk of the non-conformance identified;

- Strategies will be identified to prevent reoccurrence;
- Environmental documentation will be reviewed and revised;
- Requirement for specific training of relevant personnel and subcontractors may be identified, developed and implemented;
- In extreme cases hold points may be placed on the area or work activity until appropriate actions have been undertaken.

APPENDIX 17 ENVIRONMENTAL COMPLIANCE MATRIX

Note – All document references in this Section are limited to the extent that they apply to the planning and environmental management requirements under planning approval SSI 15_7400, not the health and safety components.

CSSI Planning Approval Conditions (SSI 15_7400)

Condition	Requirement	Document Reference
C1	A Construction Environmental Management Plan (CEMP) must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the PIR and the Department's Guideline for the Preparation of Environmental Management Plans to detail how the performance outcomes, commitments and mitigation measures specified in Chapter 11 of the PIR, as amended by the documents listed in A1, will be implemented and achieved during construction.	This EHS MP document Compliance matrix tables in Appendix 17.
C2	The CEMP must provide:	
	(a) a description of activities to be undertaken during construction (including the scheduling of construction);	Section 1.4 Appendix 11
	(b) details of environmental policies, guidelines and principles to be followed in the construction of the CSSI;	Section 2 Appendix 2
	(c) a schedule for compliance auditing;	Section 5 Appendix 16 Audit frequencies are outlined in the Auditing EHS Procedure (support document)
	(d) a program for ongoing analysis of the key environmental risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of the CSSI;	Section 4.5 Workplace Impacts and Hazards Risk Assessment (support document)
	(e) details of how the activities described in subsection (a) of this condition will be carried out to: i. meet the performance outcomes stated in the EIS as amended by the documents listed in A1; and ii. manage the risks identified in the risk analysis undertaken in subsection (d) of this condition;	Appendix 17 Appendix 1.1 Appendix 3 Section 3.5 Section 4 Workplace Impacts and Hazards Risk Assessment (support document)
	(f) an inspection program detailing the activities to be inspected and frequency of inspections;	Section 5.1 EHS Weekly Site Inspection Form (support document)
	(g) a protocol for managing and reporting any:	Section 4.3.4

	i. incidents; and	Section 4.6 Appendix 13 Incident Reporting and Management Procedure (Appendix 20)
	ii. non-compliances with this approval and with statutory requirements;	Section 5.3 Section 5.4 Appendix 16
	(h) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction;	Section 5.3 Section 5.4 Appendix 16 Incident Reporting and Management Procedure (Appendix 20)
	(i) a list of all the CEMP sub plans required in respect of construction, as set out in Condition C3. Where staged construction of the CSSI is proposed, the CEMP must also identify which CEMP sub plan applies to each of the proposed stages of construction;	Appendix 1.1
	(j) a description of the roles and environmental responsibilities for relevant employees and their relationship with the ER;	Appendix 5 Appendix 6
	(k) for training and induction for employees, including contractors and sub-contractors, in relation to environmental and compliance obligations under the terms of this approval;	Section 4.2 EHS Training Matrix (support document) EHS Training Planner (support document)
	(l) for periodic review and update of the CEMP and all associated plans and programs.	Section 1.2
C3	The following CEMP sub plans must be prepared in consultation with the relevant government agencies identified for each CEMP sub plan and be consistent with the CEMF and CEMP referred to in Condition C1. **Required CEMP sub-plan** / **Relevant government agencies to be consulted for each CEMP sub-plan** (a) Noise and vibration — Relevant Council(s) (b) Biodiversity — OEH and Relevant Council(s) (c) Air quality — N/A (d) Soil and Water — DPI Water, Relevant Council(s), OEH, SES, NSW Fire and Rescue (e) Groundwater — DPI Water ~~(f) Blasting — N/A~~ (g) Heritage — Heritage Council (or its delegate) and Relevant Council(s)	As per the Staging Report, Noise and Vibration, Heritage and Groundwater sub plans are required for the VCISD works, Appendix 1.1
C4	The CEMP sub plans must state how: (a) the environmental performance outcomes identified in the EIS as amended by the documents listed in A1 will be achieved; (b) the mitigation measures identified in the EIS as amended by documents listed in A1 will be implemented;	Compliance with this condition is further outlined in each respective sub plan

	(c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction, as identified through ongoing environmental risk analysis, will be managed.	
C5	The CEMP sub plans must be developed in consultation with relevant government agencies. Where an agency(ies) request(s) is not included, the Proponent must provide the Secretary justification as to why. Details of all information requested by an agency to be included in a CEMP sub plan as a result of consultation and copies of all correspondence from those agencies, must be provided with the relevant CEMP sub plan.	Compliance with this condition is further outlined in each respective sub plan
C6	Any of the CEMP sub plans may be submitted to the Secretary along with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before commencement of construction.	Compliance with this condition is outlined in the Pre-construction Compliance Report required under CSSI approval A31. C&SW C2S PCCR
C7	The CEMP must be endorsed by the ER and then submitted to the Secretary for approval no later than one (1) month before the commencement of construction or within another timeframe agreed with the Secretary.	Written EHS MP endorsement from the ER will be included with submission of this document to DPIE
C8	Construction must not commence until the CEMP and all CEMP sub plans have been approved by the Secretary. The CEMP and CEMP sub plans, as approved by the Secretary, including any minor amendments approved by the ER (or AA in regards to the Noise and Vibration sub-plan), must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP and sub plans have been approved by the Secretary.	Appendix 1.1 Section 1.2 Appendix 18 VCISD construction will not take place until DPIE approval of all required documents.
C9	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each Construction Monitoring Program to compare actual performance of construction of the CSSI against predicted performance. **Required Construction Monitoring Programs** / **Relevant government agencies to be consulted for each Construction Monitoring Program** (a) Noise and Vibration — EPA and Relevant Council(s) (b) Blasting — EPA and Relevant Council(s) (c) Water Quality — EPA and Relevant Council(s) (d) Groundwater — DPI Water	Section 5.1 Appendix 15 As per the Staging Report, Noise and Vibration and Groundwater Monitoring programs are required for the VCISD works and are outlined within the respective management plan.
A41 – A44	The Secretary must be notified as soon as possible and in any event within 24 hours of any incident.	Section 4.3.4 Appendix 13

DPE's Guideline for the Preparation of Environmental Management Plans EMP Content Checklist

Requirement	Included Y/N	Document Reference

Background (EMP Guideline Section 4.3.1)		
Introduction	Y	Section 1 Appendix 11
Project Description	Y	Section 1.4 Appendix 11
EMP Context	Y	Appendix 11
EMP Objectives	Y	Appendix 3 Appendix 9
Environmental Policy	Y	Building EHS Policy Statement (support document)
Environmental Management (EMP Guideline Section 4.3.2)		
Environmental Management Structure & Responsibility	Y	Appendix 4 Appendix 5 Appendix 6
Approval and Licencing Requirements	Y	Section 3.2 Appendix 2 Appendix 11
Reporting	Y	Section 5 Appendix 15 Appendix 16
Environmental Training	Y	Section 4.2 EHS Training Matrix (support document) EHS Training Planner (support document)
Emergency Contacts and Response	Y	Section 4.6 Appendix 13
Implementation (EMP Guideline Section 4.3.3)		
Risk Assessment	Y	Section 4.5 Workplace Impacts and Hazards Risk Assessment (support document)
Environmental Management Activities and Controls	Y	Section 4 Section 5 Workplace Impacts and Hazards Risk Assessment (support document)
Environmental Controls Plans or Maps	Y	Appendix 1.1 Environmental control maps are located within the relevant sub plans listed in Appendix 1.1
Environmental Schedules	Y	EHS Weekly Site Inspection Form (support document) Incident Reporting and Management Procedure (Appendix 20)

		EHS Risk Management Procedure (support document)
Monitoring and Review (EMP Guideline Section 4.3.4)		
Environmental Monitoring	Y	Appendix 15
Environmental Auditing	Y	Section 5 Appendix 16 Auditing EHS Procedure (Appendix 19)
Corrective Action	Y	Section 5.3 Section 5.4
EMP Review	Y	Section 1.2

Sydney Metro Construction Environmental Management Framework (CEMF)

Clause	Detail	Reference
3.3 (d)	As a minimum, the CEMP will:	
(i)	Include a contract specific environmental policy;	Building EHS Policy Statement (support document)
(ii)	Include a description of activities to be undertaken during construction	Section 1.4 Appendix 11
(iii)	For each plan under the CEMP include a matrix of the relevant Conditions of Approval or Consent referencing where each requirement is addressed;	Per sub plan
(iv)	For each plan under the CEMP, set objectives and targets, and identify measurable key performance indicators in relation to these;	Per sub plan
(v)	For each role that has environmental accountabilities or responsibilities, including key personnel, provide a tabulated description of the authority and roles of key personnel, lines of responsibility and communication, minimum skill level requirements and their interface with overall project organisation structure;	Appendix 4 Appendix 5 Appendix 6
(vi)	Assign the responsibility for the implementation of the CEMP to the Environment Manager, who will have appropriate experience. The Principle Contractor's Project Director will be accountable for the implementation of the CEMP;	Appendix 4 Appendix 5 Appendix 6
(vii)	Identify communication requirements, including liaison with stakeholders and the community;	Appendix 12
(viii)	Include induction and training requirements and a summary of the Training Needs Analysis required in Section 3.9(b)	Section 4.2 EHS Training Matrix (support document)

		EHS Training Planner (support document)
(ix)	Management strategies for environmental compliance and review of the performance of environmental controls;	Appendix 16 Section 3.1 Section 4.5 Section 5.3 Section 5.4 Appendix 15 Workplace Impacts and Hazards Risk Assessment (support document) Sub Plans listed in Appendix 1.1
(x)	Processes and methodologies for surveillance and monitoring, auditing and review, and reporting on environmental performance including environmental compliance tracking;	Section 5 Appendix 16 Auditing EHS Procedure (Appendix 19)
(xi)	Include procedures for emergency and incident management, non-compliance management, and corrective and preventative action; and	Section 5.3 Section 5.4 Appendix 16 Incident Reporting and Management Procedure (Appendix 20)
(xii)	Include procedures for the control of environmental records	Section 4.3.4 Section 4.4
3.4 (a)	The Principal Contractor will prepare issue-specific environmental sub plans to the CEMP and SMP (Sustainability Management Plan) which address each of the relevant environmental impacts at a particular site or stage of the project. Issue specific sub plans will include:	Appendix 1.1
(i)	Spoil management	Spoil Management Plan (sub plan to this CEMP required under Section 4.1.1 of the Staging Report)
(ii)	Groundwater management	Groundwater Management Plan (sub plan to this CEMP required under CSSI approval C3)
(iii)	Traffic and transport management	Construction Traffic Management Plan (separate to this CEMP required under CSSI approval E82)
(iv)	Noise and vibration management	VCISD CSSI Construction Noise and Vibration Management Plan (sub plan to this CEMP required under CSSI approval C3)
(v)	Heritage management	Construction Heritage Management Plan (sub plan to this CEMP required under CSSI approval C3)
(vi)	Flora and fauna management	Conservation and Habitat Management Sub Plan

(vii)	Visual amenity management	Visual Amenity Management Plan (sub plan to this CEMP required under Section 4.1.1 of the Staging Report)
(viii)	Carbon and energy management	Carbon and Energy Management Plan (incorporated into the Sustainability Management Plan as per Section 4.1.1 of the Staging Report)
(ix)	Materials management	Materials Management Plan (incorporated into the Sustainability Management Plan as per Section 4.1.1 of the Staging Report)
(x)	Soil and water management	Stormwater and Erosion Management Procedure (Appendix 21)
(xi)	Air quality management; and	Air Quality Management procedure (Appendix 22)
(xii)	Waste management and recycling.	Materials Management and Waste and Recycling Management Plan (incorporated into the Sustainability Management Plan according to Section 4.1.1 of the Staging Report)

EIS Revised Environmental Performance Outcomes

Field	Environmental performance outcomes	Document Reference
Construction traffic and transport	• The project would minimise impacts to the road network • Pedestrian and cyclist safety would be maintained • Effective coordination would be carried out to minimise cumulative network impacts • Access to properties would be maintained.	Construction Traffic Management Plan
Operational traffic and transport	• The project would appropriately integrate with existing and planned future transport infrastructure including active transport • Access to properties would be maintained • Metro customers would be provided with a safe and secure service • The project would reduce station crowding, increase rail network reach and use, improve network resilience, and improve travel times within the global economic corridor.	Not applicable to this plan or any construction component of the VCISD scope of works
Construction noise and vibration	• Noise levels would be minimised with the aim of achieving the noise management levels where feasible and reasonable • The project would avoid any damage to buildings from vibration.	Construction Noise and Vibration Management Plan
Operational noise and vibration	• Noise levels would comply with the Rail Infrastructure Noise Guidelines (Environment Protection Authority, 2013).	Not applicable to this plan or any construction

	• The project would avoid any damage to buildings from vibration.	component of the VCISD scope of works
Landuse and property	• The project would be appropriately integrated into local landuse planning strategies • The surface footprint of the project would be minimised • The project would provide substantial future development opportunities.	Not applicable to this plan as it has been assessed within the EIS and not relevant to the construction component of the VCISD scope of works
Business impacts	• The project would minimise impacts on businesses during construction • During operation, the project would improve access to businesses for employees and customers, and connectivity between businesses within the global economic corridor	Business Management Plan
Non-Aboriginal heritage	• The project would be sympathetic to heritage items and, where feasible and reasonable, avoid and minimise impacts to non-Aboriginal heritage items and archaeology • The design of the project would reflect the input of an independent heritage architect, relevant stakeholders and the design review panel.	Construction Heritage Management Plan
Aboriginal heritage	• The project would be sympathetic to heritage items and, where feasible and reasonable, avoid and minimise impacts to Aboriginal heritage items and archaeology • The design of the project would reflect the input of an independent heritage architect, relevant stakeholders and the design review panel.	Construction Heritage Management Plan
Landscape character and visual amenity	• During operation, the project would make a positive contribution to the quality of the urban environment at each station site • During operation, the project would minimise change to landscape character in the vicinity of the dive structures and Artarmon substation • The project would be visually integrated with its surroundings.	Not applicable to this plan or any construction component of the VCISD scope of works
Groundwater and geology	• The project would make good any impacts on groundwater users • The project would avoid any damage to buildings from settlement.	Construction Groundwater Management Plan
Soils, contamination and water quality	• Erosion and sediment controls during construction would be implemented in accordance with *Managing Urban Stormwater: Soils and Construction Volume 1* (Landcom, 2004) and *Managing Urban Stormwater: Soils and Construction Volume 2* (Department of Environment and Climate Change, 2008a) • There would be no impacts on aquatic environments associated with the disturbance	Stormwater and Erosion Management Procedure (Appendix 21) Contamination Management Procedure (Appendix 24) Operational water discharge is not applicable to this plan or any construction

	of acid sulfate soils during construction • Any contamination on project sites would be remediated to suit future land use • The project would protect or contribute to achieving the Water Quality Objectives, during construction and operation • Construction water quality discharge would comply with the requirements of an environment protection licence issued to the project • Operation water quality discharge would comply with a discharge criteria determined in consultation with the NSW Environment Protection Authority.	component of the VCISD scope of works
Social impacts and community facilities	• The project would avoid long term impacts (during operation) on the availability and quality of public open space and community facilities • The project, during operation, would help to improve access to local facilities, services and destinations, supporting opportunities for community interaction.	Not applicable to this plan or any construction component of the VCISD scope of works
Biodiversity	• The biodiversity outcome would be consistent with the Framework for Biodiversity Assessment • The project would minimise impacts to biodiversity.	Conservation and Habitat Management Procedure (Appendix 23)

Flooding and hydrology	• Changes to overland flow diversions during construction would meet the following criteria:
	  ○ Not worsen existing flooding characteristics up to and including the 100 year annual recurrence interval event in the vicinity of the project (not worsen is defined as a maximum increase flood levels of 50mm in a 100 year Average Recurrence Interval flood event, a maximum increase in time of inundation of one hour in a 100 year Average Recurrence Interval flood event, and no increase in the potential for soil erosion and scouring from any increase in flow velocity in a 100 year Average Recurrence Interval flood event).
	  ○ Dedicated evacuation routes would not be adversely impacted in flood events up to and including the probable maximum flood.
	• There would be no additional private properties affected by flooding up to and including the 100 year average recurrence interval event during operation
	• The performance of the downstream drainage network would be maintained during operation.
		Stormwater and Erosion Management procedure (Appendix 21)
		
		ArcMac design documentation

Air quality	• Dust and exhaust emissions during construction would be minimised.	Air Quality Management Procedure (Appendix 21)
Hazard and risk	• The storage, use and transport of dangerous goods and hazardous substances would comply with *Hazardous and Offensive Development Application Guidelines: Applying SEPP 33* (Department of Planning, 2011) • There would be no unplanned or unexpected disturbance of utilities.	Contamination Management Procedure (Appendix 24)
Waste Management	• All waste would be assessed, classified, managed and disposed of in accordance with the NSW Waste Classification Guidelines • 100 per cent of spoil that can be reused would be beneficially reused in accordance with the project spoil reuse hierarchy. • A recycling target of at least 90 per cent would be adopted for the construction of the project.	Waste Management Plan (incorporated into the Sustainability Management Plan)
Sustainability	• The project would be carried out in accordance with the Sydney Metro City & Southwest Environment and Sustainability Policy • 25 per cent of the greenhouse gas emissions associated with consumption of electricity during construction would be offset • 100 per cent of the greenhouse gas emissions associated with consumption of electricity during operation would be offset.	Sustainability Management Plan

Applicable Construction Revised Environmental Mitigation Measures

REMM ID	Mitigation Measure	Timeframe Required	Reference
Construction traffic and transport			
T1	Ongoing consultation would be carried out with (as relevant to the location) the CBD Coordination Office, Roads and Maritime Services, Sydney Trains, NSW Trains, the Port Authority of NSW, Barangaroo Delivery Authority, local councils, emergency services and bus operators in order to minimise traffic and transport impacts during construction	Prior to construction	Construction Traffic Management Plan
T2	Road Safety Audits would be carried out at each construction site. Audits would address vehicular access and egress, and pedestrian, cyclist and public transport safety	During construction	Construction Traffic Management Plan
T3	Directional signage and line marking would be used to direct and guide drivers and pedestrians past construction sites and on the surrounding network. This would be supplemented by Variable	During construction	Construction Traffic Management Plan

	Message Signs to advise drivers of potential delays, traffic diversions, speed restrictions, or alternate routes		
T4	In the event of a traffic related incident, co-ordination would be carried out with the CBD Coordination Office and / or the Transport Management Centre's Operations Manager.	During construction	Construction Traffic Management Plan
T5	The community would be notified in advance of proposed road and pedestrian network changes through media channels and other appropriate forms of community liaison	During construction	Construction Traffic Management Plan
T6	Vehicle access to and from construction sites would be managed to ensure pedestrian, cyclist and motorist safety. Depending on the location, this may require manual supervision, physical barriers, temporary traffic signals and modifications to existing signals or, on occasions, police presence.	During construction	Construction Traffic Management Plan
T7	Additional enhancements for pedestrian, cyclist and motorist safety in the vicinity of the construction sites would be implemented during construction. This would include measures such as: • Use of speed awareness signs in conjunction with variable message signs near construction sites to provide alerts to drivers • Community educational events that allow pedestrians, cyclists or motorists to sit in trucks and understand the visibility restrictions of truck drivers, and for truck drivers to understand the visibility from a bicycle; and a campaign to engage with local schools to educate children about road safety and to encourage visual contact with drivers to ensure they are aware of the presence of children • Specific construction driver training to understand route constraints, expectations, safety issues, human error and its relationship with fitness for work and chain of responsibility duties, and to limit the use of compression braking • Use of In Vehicle Monitoring Systems (telematics) to monitor vehicle location and driver behaviour • Safety devices on construction vehicles that warn drivers of the presence of a vulnerable road user located in the vehicles' blind spots and warn the vulnerable road user that a vehicle is about to turn.	During construction	Construction Traffic Management Plan
T8	Access to existing properties and buildings would be maintained in consultation with property owners.	During construction	Construction Traffic Management Plan

T9	All trucks would enter and exit construction sites in a forward gear, where feasible and reasonable.	During construction	Construction Traffic Management Plan
T10	Any relocation of bus stops would be carried out by Transport for NSW in consultation with Roads and Maritime Services, the CBD Coordination Office (for relevant locations), the relevant local council and bus operators. Wayfinding and customer information would be provided to notify customers of relocated bus stops.	Before relocation of bus stops	Construction Traffic Management Plan
T12	Construction sites would be managed to minimise construction staff parking on surrounding streets. The following measures would be implemented: • Encouraging staff to use public or active transport • Encouraging ride sharing • Provision of alternative parking locations and shuttle bus transfers where feasible and reasonable. • Transport for NSW would work with local councils to minimise adverse impacts of construction on parking and other kerbside use in local streets, such as loading zones, bus zones, taxi zones and coach zones.	During construction	Construction Traffic Management Plan
T13	Construction site traffic would be managed to minimise movements in the AM and PM peak periods.	During construction	Construction Traffic Management Plan
T14	Construction site traffic immediately around construction sites would be managed to minimise movements through school zones during pick up and drop off times.	During construction	Construction Traffic Management Plan
T19	Where existing parking is removed to facilitate construction activities, alternative parking facilities would be provided where feasible and reasonable	During construction	Construction Traffic Management Plan
T21	The potential combined impact of trucks from multiple construction sites would be further considered during the development of Construction Traffic Management Plans	Prior to construction	Construction Traffic Management Plan
T22	Where existing footpath routes used by pedestrians and / or cyclists are affected by construction, a condition survey would be carried out to confirm they are suitable for use (eg suitably paved and lit), with any necessary modifications to be carried out in consultation with the relevant local council.	Prior to construction	Construction Traffic Management Plan
T28	The connectivity provided by the pedestrian route that extends from Elliot Street along the eastern boundary of 52 McLaren Street to McLaren Street would be retained during construction (in conjunction with suitable pedestrian management measures along the McLaren Street frontage).	During construction	Construction Traffic Management Plan
Construction Noise and Vibration			

NV1	The Construction Noise and Vibration Strategy would be implemented with the aim of achieving the noise management levels where feasible and reasonable. This would include the following example standard mitigation measures where feasible and reasonable: • Provision of noise barriers around each construction site • Provision of acoustic sheds at Victoria Cross site • The coincidence of noisy plant working simultaneously close together would be avoided • Offset distances between noisy plant and sensitive receivers would be increased • Residential grade mufflers would be fitted to all mobile plant • Dampened rock hammers would be used • Non-tonal reversing alarms would be fitted to all permanent mobile plant • High noise generating activities would be scheduled for less sensitive period considering the nearby receivers • The layout of construction sites would consider opportunities to shield receivers from noise. This would also include carrying out the requirements in relation to construction noise and vibration monitoring.	During construction	Construction Noise and Vibration Management Plan
NV2	Unless compliance with the relevant traffic noise criteria can be achieved, night time heavy vehicle movements at the Victoria Cross Station (southern) site would be restricted to: • McLaren Street, Miller Street and Berry Street at the Victoria Cross Station southern construction site	During construction	Construction Noise and Vibration Management Plan
NV3	Where vibration levels are predicted to exceed the screening criteria, a more detailed assessment of the structure and attended vibration monitoring would be carried out to ensure vibration levels remain below appropriate limits for that structure. For heritage items, the more detailed assessment would specifically consider the heritage values of the structure in consultation with a heritage specialist to ensure sensitive heritage fabric is adequately monitored and managed.	Prior to construction	Construction Noise and Vibration Management Plan
NV4	Feasible and reasonable measures would be implemented to minimise ground borne noise where exceedances are predicted	During construction	Construction Noise and Vibration Management Plan
NV6	Transport for NSW would engage an Independent Acoustic Advisor to act independently of the design and construction teams and provide oversight of construction methods, construction noise and vibration planning, management and	During construction	Construction Noise and Vibration Management Plan

	mitigation, and construction noise and vibration monitoring and reporting. [refer REMMs for detail]		Independent AA engaged by Sydney Metro prior to VCISD commencing.
NV7	Alternative demolition techniques that minimise noise and vibration levels would be investigated and implemented where feasible and reasonable. • The use of hydraulic concrete shears in lieu of hammers/rock breakers • Sequencing works to shield noise sensitive receivers by retaining building wall elements • Locating demolition load out areas away from the nearby noise sensitive receivers • Providing respite periods for noise intensive works • Methods to minimise structural-borne noise to adjacent buildings including separating the structural connection prior to demolition through saw-cutting and propping, using hand held splitters and pulverisers or hand demolition • Installing sound barrier screening to scaffolding facing noise sensitive neighbours • Modifying demolition works sequencing / hours to minimise impacts during peak pedestrian times and / or adjoining neighbour outdoor activity periods.	Prior to construction	Construction Noise and Vibration Management Plan. Note: no demolition works completed as part of the VCISD project.
NV10	Further background monitoring would be conducted at a receiver addressing McLaren Street during the preparation of the Construction Noise and Vibration Impact Statements to confirm the applicable noise management levels for construction.	Prior to construction	Construction Noise and Vibration Management Plan. With TSE excavation and construction works occurring prior to VCISD project taking the site, background noise levels would be influenced and therefore not representative of normal conditions. TSE works do not allow for further representtaive background monitoring to be completed. Noise levels will be monitored during construction works to ensure appropriate mitigation and management measures are in place, utilising background noise levels outlined in the EIS.

NV11	Opportunities to minimise heavy vehicle movements from the Victoria Cross Station northern construction site at night would be further investigated during detailed construction planning.	During construction	Construction Traffic Management Plan
Business impacts			
BI1	Specific consultation would be carried out with businesses potentially impacted during construction. Consultation would aim to identify and develop measures to manage the specific construction impacts for individual businesses.	Prior to construction	Business Management Plan
BI2	A business impact risk register would be developed to identify, rate and manage the specific construction impacts for individual businesses.	During construction	Business Management Plan
BI3	Appropriate signage would be provided around construction sites to provide visibility to retained businesses.	During construction	Business Management Plan
Non-Aboriginal heritage			
NAH2	The archaeological research design would be implemented. Significant archaeological findings would be considered for inclusion in heritage interpretation (as per NAH8) for the project and be developed in consultation with the relevant local council.	During construction	Construction Heritage Management Plan.
NAH3	An Exhumation Policy and Guideline would be prepared and implemented. It would be developed in accordance with the Guidelines for Management of Human Skeletal Remains (NSW Heritage Office, 1998b) and NSW Health Policy Directive – Exhumation of human remains (December, 2013). It would be prepared in consultation with NSW Heritage Office and NSW Health.	During construction	Construction Heritage Management Plan
NAH5	Prior to total or partial demolition of heritage items at Victoria Cross station, heritage fabric for salvage would be identified and reuse opportunities for salvaged fabric considered. This would include salvage and reuse of heritage tiles to be impacted at Martin Place Station.	Prior to construction	Construction Heritage Management Plan. No demolition of heritage items proposed.
NAH6	An appropriately qualified and experienced heritage architect would form part of the Sydney Metro Design Review Panel and would provide independent review periodically throughout detailed design.	Prior to construction	Design Review Panel established by Sydney Metro prior to VCISD commencement.
NAH7	The project design would be sympathetic to heritage items and, where reasonable and feasible, minimise impacts to the setting of heritage items.	Prior to construction	Heritage Interpretation Plan
NAH8	Appropriate heritage interpretation would be incorporated into the design for the project in	Prior to construction	Heritage Interpretation Plan

	accordance with the NSW Heritage Manual, the NSW Heritage Office's Interpreting Heritage Places and Items: Guidelines (August 2005), and the NSW Heritage Council's Heritage Interpretation Policy.		
NAH17	Opportunities for the salvage and reuse of the bus shelters temporarily removed at Victoria Cross and Blues Point would be investigated in consultation with North Sydney Council.	During construction	Construction Heritage Management Plan Heritage Interpretation Plan
Aboriginal heritage			
AH1	Aboriginal stakeholder consultation would be carried out in accordance with the NSW Office of Environment and Heritage's Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.	Prior to construction	Construction Heritage Management Plan
AH2	The cultural heritage assessment report would be implemented.	During construction	Construction Heritage Management Plan
AH4	Appropriate Aboriginal heritage interpretation would be incorporated into the design for the project in consultation with Aboriginal stakeholders.	Prior to construction	Heritage Interpretation Plan
Landscape character and visual amenity			
LV1	Where feasible and reasonable, the elements within construction sites would be located to minimise visual impacts, for example materials and machinery would be stored behind fencing.	During construction	Visual Amenity Management Plan
LV2	Existing trees to be retained would be protected prior to the commencement of construction in accordance with Australian Standard AS4970 the Australian Standard for Protection of Trees on Development Sites and Adjoining Properties.	Prior to construction	Conservation and Habitat Management Procedure (Appendix 23)
LV3	Lighting of construction sites would be oriented to minimise glare and light spill impact on adjacent receivers.	During construction	Visual Amenity Management Plan
LV4	Visual mitigation would be implemented as soon as feasible and reasonable after the commencement of construction, and remain for the duration of the construction period.	During construction	Visual Amenity Management Plan
LV5	Opportunities for the retention and protection of existing trees would be identified during detailed construction planning.	Prior to construction	Conservation and Habitat Management Procedure (Appendix 23)
LV6	The design and maintenance of construction site hoardings would aim to minimise visual amenity and landscape character impacts, including the prompt removal of graffiti. Public art opportunities would be considered.	Prior to construction	Visual Amenity Management Plan

LV7	The selection of materials and colours for acoustic sheds would aim to minimise their visual prominence.	Prior to constructing acoustic sheds	VCISD will not be constructing any acoustic sheds
LV10	Temporary impacts to public open space would be rehabilitated in consultation with the relevant local council and / or landowner	During construction	Visual Amenity Management Plan
Soils, contamination and water quality			
SCW1	Updated desktop contamination assessments would be carried out for Victoria Cross Station. If sufficient information is not available to determine the remediation requirements and the impact on potential receivers, then detailed contamination assessments, including collection and analysis of soil and groundwater samples would be carried out. In the event a Remediation Action Plan is required, these would be developed in accordance with Managing Land Contamination: Planning Guidelines SEPP 55 – Remediation of Land (Department of Urban Affairs and Planning and Environment Protection Authority, 1998) and a site auditor would be engaged.	Prior to construction	Contamination Management Sub Plan. Note – bulk excavation completed prior to VCISD works commencing. No contamination identified.
SCW3	Erosion and sediment control measures would be implemented in accordance with Managing Urban Stormwater: Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater: Soils and Construction Volume 2 (Department of Environment and Climate Change, 2008a). Measures would be designed as a minimum for the 80th percentile; 5-day rainfall event.	During construction	Stormwater and Erosion Management Procedure (Appendix 21)
SCW4	Discharges from the construction water treatment plants would be monitored to ensure compliance with the discharge criteria in an environment protection licence issued to the project.	During construction	Stormwater and Erosion Management Procedure (Appendix 21)
Social impacts and community infrastructure			
SO2	Specific consultation would be carried out with sensitive community facilities (including aged care, child care centres, educational institutions and places of worship) potentially impacted during construction. Consultation would aim to identify and develop measures to manage the specific construction impacts for individual sensitive community facilities.	Prior to construction	Community Consultation Strategy
Biodiversity			
B3	The local WIRES group and / or veterinarian would be contacted if any fauna are injured on site or require capture and / or relocation.	During construction	Conservation and Habitat Management Procedure (Appendix 23)
Air quality			

AQ1	The engines of all on-site vehicles and plant would be switched off when not in use for an extended period.	During construction	Air Quality Management Procedure (Appendix 22)
AQ2	Plant would be well maintained and serviced to minimise emissions. Emissions from plant would be considered as part of pre-acceptance checks.	During construction	Air Quality Management Procedure (Appendix 22)
AQ3	Construction site layout and placement of plant would consider air quality impacts to nearby receivers.	During construction	Air Quality Management Procedure (Appendix 22)
AQ4	Hard surfaces would be installed on long term haul routes and regularly cleaned.	During construction	Air Quality Management Procedure (Appendix 22)
AQ5	Unsurfaced haul routes and work area would be regularly damped down in dry and windy conditions.	During construction	Air Quality Management Procedure (Appendix 22)
AQ6	All vehicles carrying loose or potentially dusty material to or from the site would be fully covered.	During construction	Air Quality Management Procedure (Appendix 22)
AQ7	Stockpiles would be managed to minimise dust generation.	During construction	Air Quality Management Procedure (Appendix 22)
AQ8	Demolition would be managed to minimise dust generation.	During construction	Air Quality Management Procedure (Appendix 22)
AQ9	Ventilation from acoustic sheds would be filtered.	During construction	Air Quality Management Procedure (Appendix 22)
Hazard and risk			
HR1	All hazardous substances that may be required for construction would be stored and managed in accordance with the Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW, 2005) and Hazardous and Offensive Development Application Guidelines: Applying SEPP 33 (Department of Planning, 2011).	During construction	Contamination Management Procedure (Appendix 24)
HR2	Dial before you dig searches and non-destructive digging would be carried out to identify the presence of underground utilities.	During construction	Contamination Management Procedure (Appendix 24)
Waste management			
WM1	All waste would be assessed, classified, managed and disposed of in accordance with the NSW Waste Classification Guidelines.	During construction	Waste Management Plan (incorporated into the Sustainability Management Plan)
WM2	100 per cent of spoil that can be reused would be beneficially reused in accordance with the project spoil reuse hierarchy.	During construction	Waste Management Plan (incorporated into the Sustainability Management Plan)
WM3	A recycling target of at least 90 per cent would be adopted for the project.	During construction	Waste Management Plan (incorporated into the Sustainability Management Plan)

WM4	Construction waste would be minimised by accurately calculating materials brought to the site and limiting materials packaging.	During construction	Waste Management Plan (incorporated into the Sustainability Management Plan)
Sustainability			
SUS1	Sustainability initiatives would be incorporated into the detailed design and construction of the project to support the achievement of the project sustainability objectives.	During construction	Sustainability Management Plan
SUS2	A best practice level of performance would be achieved using market leading sustainability rating tools during design and construction.	Prior to and during construction	Sustainability Management Plan
SUS3	A workforce development and industry participation strategy would be developed and implemented during construction.	During construction	Sustainability Management Plan
SUS4	Climate change risk treatments would be incorporated into the detailed design of the project including: • Ensuring that adequate flood modelling is carried out and integrated with design • Testing the sensitivity of air-conditioning systems to increased temperatures, and identify potential additional capacity of air-conditioning systems that may be required within the life of the project, with a view to safeguarding space if required • Testing the sensitivity of ventilation systems to increased temperatures and provide adequate capacity.	Prior to construction	Sustainability Management Plan
SUS5	An iterative process of greenhouse gas assessments and design refinements would be carried out during detailed design and construction to identify opportunities to minimise greenhouse gas emissions. Performance would be measured in terms of a percentage reduction in greenhouse gas emissions from a defined reference footprint.	Prior to and during construction	Sustainability Management Plan
SUS6	25 per cent of the greenhouse gas emissions associated with consumption of electricity during construction would be offset.	During construction	Sustainability Management Plan
Cumulative impacts			
CU1	Transport for NSW would manage and co-ordinate the interface with projects under construction at the same time. Co-ordination and consultation with the following stakeholders would occur, where required: • CBD Coordination Office • Department of Planning and Environment • Roads and Maritime Services • Sydney Trains • NSW Trains	Prior to construction	Construction Traffic Management Plan Community Communications Strategy

	• Sydney Buses • Sydney Water • Port Authority of NSW • Willoughby Council • North Sydney Council • City of Sydney Council • Marrickville Council • Sydney Motorways Corporation • Barangaroo Delivery Authority • Emergency service providers • Utility providers • Construction contractors. Co-ordination and consultation with these stakeholders would include: • Provision of regular updates to the detailed construction program, construction sites and haul routes Identification of key potential conflict points with other construction projects • Developing mitigation strategies in order to manage conflicts. Depending on the nature of the conflict, this could involve: ○ Adjustments to the Sydney Metro construction program, work activities or haul routes; or adjustments to the program, activities or haul routes of other construction projects ○ Co-ordination of traffic management arrangements between projects.		

APPENDIX 18 ENVIRONMENTAL REPRESENTATIVEAND ACOUSTIC ADVISOR RESPONSIBILITIES

The VCISD project will cooperate with, assist, and facilitate any actions necessary for the Environmental Representative and Acoustics Advisor to carry out their obligations under the planning approval.

Environmental Representative

The Environmental Representative (ER) is engaged by Sydney Metro and has been approved by DPIE.

The role of the ER is specified in MCoA A22-24 and is as follows:

- Receive and respond to communications from the DPIE in relation to the environmental performance of the CSSI.
- Consider and inform the Secretary of DPIE on matters specified in the terms of the MCoA.
- Consider and recommend any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community.
- Review documents identified in MCoA C1, C3 and C9 and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under the planning approval and if so:
    - make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary), or
    - make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Secretary for information or are not required to be submitted to the Secretary);
- Regularly monitor the implementation of environmental management related documents to ensure implementation is being carried out in accordance with what is stated in the document and the terms of the MCoA.
- Review the Project's notification of incidents in accordance with Condition A41 of the MCoA.
- As may be requested by the DPIE, help plan, attend or undertake DPIE audits of Lendlease's activities, briefings, and site visits.
- If conflict arises between the Proponent and the community in relation to the environmental performance of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B3 of the MCoA to attempt to resolve the conflict, and if it cannot be resolved, notify the Secretary.
- Review any draft consistency assessment that may be carried out by the Proponent and provide advice on any additional mitigation measures required to minimise the impact of the work.
- Consider any minor amendments to be made to the documents listed in MCoA C1, C3 and C9 and any document that requires the approval of the Secretary (excluding noise and vibration documents) that comprise updating or are of an administrative or minor nature, and are consistent with the terms of the MCoA and the documents listed in MCoA C1, C3 and C9 or other documents approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of the MCoA.
- Assess the impacts of any minor ancillary facilities as required by Condition A18 of the MCoA.
- Prepare and submit to the DPIE and other relevant regulatory agencies, for information, a monthly Environmental Representative Report detailing the ER's actions and decisions on matters for which the ER was responsible in the preceding month (or other timeframe agreed with the DPIE). The Environmental Representative Report must be submitted within seven (7) days following the end of each

month for the duration of works and construction of the Lendlease activities, or as otherwise agreed with the DPIE.

- The ER will liaise with the independent Acoustic Advisor in relation to noise and vibration documentation and monitoring compliance and rely on the AA's technical advice for all noise and vibration aspects.

Acoustic Advisor

The independent Acoustic Advisor (AA) is engaged by Sydney Metro and approved by DPE. The primary role of the AA is to independently oversee construction noise and vibration planning, management and mitigation in accordance with the MCoA. The role of the AA is set out under MCoA Conditions A25 to A27 as follows:

- Receive and respond to communication from the Secretary in relation to the performance of the CSSI in relation to noise and vibration;
- Consider and inform the Secretary on matters specified in the terms of the planning approval relating to noise and vibration;
- Consider and recommend improvements that may be made to work practices to avoid or minimise adverse noise and vibration impacts;
- Review all noise and vibration documents required to be prepared under the terms of the planning approval and, should they be consistent with the terms of the approval, endorse them before submission to the Secretary (if required to be submitted to the Secretary) or before implementation (if not required to be submitted to the Secretary);
- Regularly monitor the implementation of all noise and vibration documents required to be prepared under the terms of the planning approval to ensure implementation is in accordance with what is stated in the document and the terms of the approval;
- Review the Project's notification of noise and vibration incidents in accordance with Condition A41 of the planning approval;
- In conjunction with the ER (where required), the AA must:
    - consider requests for out of hours construction activities and determine whether to endorse the proposed activities in accordance with Condition E47;
    - as may be requested by the Secretary or Complaints Mediator, help plan, attend or undertake audits of noise and vibration management of the CSSI including briefings, and site visits;
    - if conflict arises between the Proponent and the community in relation to the noise and vibration performance during construction of the CSSI, follow the procedure in the Community Communication Strategy approved under Condition B3 of the planning approval to attempt to resolve the conflict, and if it cannot be resolved, notify the Secretary;
    - consider relevant minor amendments made to any noise and vibration document approved by the Secretary that require updating or are of an administrative or minor nature, and are consistent with the terms of the planning approval and the document approved by the Secretary and, if satisfied such amendment is necessary, endorse the amendment. This does not include any modifications to the terms of the planning approval;
    - assess the noise impacts of minor ancillary facilities as required by Condition A18 of the planning approval; and
    - prepare and submit to the Secretary and other relevant regulatory agencies, for information, a monthly Noise and Vibration Report detailing the AAs actions and decisions on matters for which the AA was responsible in the preceding month (or other timeframe agreed with

the Secretary). The Noise and Vibration Report must be submitted within seven (7) days following the end of each month for the duration of construction of the CSSI, or as otherwise agreed with the Secretary.

The VCISD project will cooperate with the AA by considering any recommendations to improve practices and demonstrating, to the satisfaction of the AA, why any recommendation is not adopted.

APPENDIX 19 AUDITING EHS PROCEDURE

AUDITING EHS PROCEDURE

DOCUMENT HISTORY

Content Owner	Ross Trethewy

Issue	Change Type	Amendment Summary	Author	Date
1.0	Publish new		Brad Crockett	22/08/2014
1.1	Amendment	Requirement for Workplace Manager participation	Brad Crockett	12/01/2015
1.2	Amendment	Modification to Table One	Brad Crockett	09/06/2015
1.3	Amendment	Inclusion of requirement to record causation	Brad Crockett	07/08/2015
1.4	Amendment	Rebrand, removal of IQA, change to scoring	Brad Crockett	10/03/2015
1.5	Amendment	Amendment to Table one to provide greater clarification, change of reference to Lendlease Design to Applied Insight, removal of the term pursuant and changes to part 7.0.	Ross Trethewy	08/01/2018

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1.0 INTRODUCTION

This procedure applies to all persons who undertake EHS MS audits at LLB workplaces

2.0 PURPOSE

The Purpose of this procedure is to provide direction for persons undertaking Environment, Health and Safety Management System auditing of the implementation of the Lendlease Building (LLB) Environment Health and Safety Management System (EHS MS). The procedure describes the methodology for ensuring consistency in the undertaking, recording and management of LLB EHS MS audits.

3.0 RESPONSIBILITY

3.1 Auditee(s) – Workplace Manager(s)

EHS MS auditing does not in any way relieve a Workplace Manager(s) or others from the responsibility of ensuring that adequate work, health and safety (or equivalent OSH/OHS) hazard and related risks and environment impact control measures are in place and effective for all business activities for which they hold accountability.

The Workplace Manager is responsible for:

- Cooperating with the requests of the Auditor and providing unrestricted and timely access to selected staff and all requested documents and records relevant to the audit.
- Participating in the audit opening meeting and the audit closing meeting.
- Ensuring that workplace rules or induction concerning work, health and safety, security or environment precautions are communicated to the Auditor or Audit Team as required.
- Establishing contacts and timing for interviews.
- Arranging visits to specific parts of the audit site where necessary.
- Nominating a workplace representative to participate in the audit on behalf of the Auditee and accompany and guide the Auditor or Audit Team during the audit process.
- Providing clarification or assisting in collecting information.
- Implementing timely corrective/preventative action as determined by the Auditor (but not exceeding 30 days) in response to the audit findings.
- Prioritising corrective/preventative action according to the assessed risk ranking applied to any non-conformity.
- Monitoring the implementation and the effectiveness of corrective action implemented to prevent recurrence of any non-conformities identified.
- Where requested, providing the audit results to any external client related to a Joint Venture or other project, subject to consultation with the Head of EHS and Regional EHS Manager.

3.2 Head of EHS

Responsible for:

- Undertaking and successfully completing an external accredited auditor training course in work health and safety (or equivalent OHS) and environment.
- Ensuring that other direct report EHS personnel with roles and responsibilities that include auditing, have undertaken and successfully completed an external accredited auditor training course in work health and safety (or equivalent OHS) and environment.

- Facilitate the scheduling and communicating of Australian/New Zealand/International Standards certification auditing in line with LLB management directives.
- Oversee the review of all audit findings to assist in:
  - ongoing review of the EHS MS and the development of preventative action;
  - annual review of the EHS Management System; and
  - the development of EHS strategic planning across LLB
  - conducting EHS MS audits from time to time as necessary

3.3 Regional EHS Manager / Head of EHS Integrated Project

Responsible for:

- Undertaking and successfully completing an external accredited auditor training course in work health and safety (or equivalent OHS) and environment.
- Ensuring that other EHS personnel with roles and responsibilities that include auditing, e.g. EHS Coordinators, have undertaken and successfully completed an external accredited auditor training course in work health and safety (or equivalent OHS) and environment.
- Providing a minimum 5 working days' notice to the Workplace Manager of any LLB workplace, of the intent to audit that workplace.
- Publishing an annual Audit Schedule for Workplace EHS Audits for Workplaces within their Region/Precinct.
- Managing 2nd Party audits within their Region.
- Monitoring the implementation and the effectiveness of corrective action by the Workplace Manager in correcting any major or minor non-conformity outlined in the audit findings.

3.4 Auditor(s)

Responsible for:

- Conducting EHS MS audits according to this procedure and AS/NZS ISO19011 Guidelines for Quality and/or Environmental Management Systems Auditing.
- Conducting a formal opening meeting (including a formal attendance list of those at the opening meeting) outlining the scope and objectives of the audit and specific requirements required to facilitate the audit.
- Conducting a closing meeting (including a formal attendance list of those at the closing meeting) outlining the findings and a completed typed report no later than 10 working days after the audit. The audit report should contain the date it was published and the date the audit was undertaken.
- Including an appropriate time period (not exceeding 30 days) for the Workplace Manager to implement corrective action, if any, required by the audit findings.

4.0 RELATED DOCUMENTS

The Related Documents available for use in conjunction with this procedure are as follows:

- AS/NZS ISO 19011:2003 Guidelines for quality and/or environmental management systems auditing
- Project / Workplace EHS MS Audit Tool
- RBU EHS MS Audit Tool
- EHS Monthly Review Template

5.0 DEFINITIONS

5.1 Audit

Systematic and documented process of reviewing documented systems and procedures against their implementation in the workplace (i.e. what is stated - vs - what is done).

5.2 Audit criteria

LLB EHS MS controlled audit tool based on AS/NZS4801; OHSAS 18001; AS/NZS ISO14001.

5.3 Audit schedule

Program of auditing prepared by Head of EHS or the Regional EHS Manager as appropriate.

5.4 Audit evidence

Records, statements of fact or other information, which are relevant to the audit criteria and verifiable. Note that audit evidence may be qualitative or quantitative.

5.5 Audit findings

Results of the evaluation of the collected audit evidence against audit criteria. Note that audit findings can indicate either conformity or non-conformity with audit criteria.

5.6 Audit conclusion

Outcome of an audit, provided by the Auditor or Audit Team Leader after consideration of the audit objectives and all audit findings.

5.7 Auditor(s)

Person(s) with the qualifications and competence to conduct an audit.

5.8 Audit team

One or more auditors conducting an audit

5.9 Auditee

LLB workplace/ project /business unit being audited and more specifically the workplace manager of the workplace at which the audit will be conducted.

5.10 Audit score

Numerical value expressed as a percentage of total available score, given to the audit findings.

5.11 Competent Person

A person that has been deemed to meet the combination of licences, qualifications, training and instruction as defined by the company or by legal requirements for an activity or works.

5.12 Conformity Assessment Body

An organisation accredited by JAS-ANZ and retained by LLB to certify that the LLB EHS MS conforms to the requirements of AS/NZS4801, OHSAS 18001 and AS/NZS ISO14001.

5.13 Enablon

Means the Intranet based incident reporting system used by Lend Lease for incident recording and reporting and other risk management practices.

5.14 Audit Criteria

Lendlease Building controlled audit tool(s) for undertaking Workplace EHS Audits and EHS Management System Audits.

5.15 Head of EHS

A Lendlease Building employee with overall responsibility for the management of EHS within Australia

5.16 Independent

Auditors independent of the Workplace being audited and free from bias and conflict of interest.

5.17 Inspection

Systematic process of hazard spotting in the workplace.

5.18 Major Non-conformity

Non-fulfilment of a documented requirement or systemic (major) implementation breakdown or lack of procedure to meet the requirements of the Standard.

5.19 Minor Non-conformity

Partial non-fulfilment of a documented requirement or minor gaps in implementation.

5.20 Observation

A comment by the auditor where full conformity has been achieved, but the potential to reach a higher standard is possible.

5.21 Region

A geographical area of responsibility within the Lend Lease group.

5.22 Regional EHS Manager

A Lend Lease employee with responsibility for EHS management in a state/territory of operation.

5.23 Second Party Workplace Audits

An external audit undertaken on behalf of LLB clients or Government bodies, of the LLB EHS MS using proprietary audit criteria.

5.24 Third Party Workplace Audits

An external audit by a Conformity Assessment Body of the LLB EHS MS using proprietary audit criteria.

5.25 Workplace

Any place, area or location that a person is required to access to undertake their employment duties.

5.26 Workplace Manager

Means Construction Manager (construction site), Project Manager, General Manager, Practice Manager (Lendlease Applied Insight), or any other workplace or department specific manager of Lendlease Building with the responsibility for day-to-day management or control of a workplace(s).

6.0 SCOPE AND FREQUENCY OF AUDITS

Internal audits are conducted in accordance with the methodology outlined in International Standards Organisation AS/NZS ISO19011 Guidelines for Quality and/or Environmental Management Systems Auditing. Audits are scheduled and conducted as outlined in Table one:

Table One

EHS Audit Type	Responsible	Frequency + Scope
Construction Operations - internal independent implementation audit of EHS Management System and Legal Conformity at the Regional Business Unit level.	Regional EHS Manager / Head of EHS Integrated Project	Workplace EHS Audit of LLB construction workplaces undertaken three monthly using the Audit Criteria for the *sample size outlined.
Property Asset Operations – Plant Yards	Regional EHS Manager	Workplace EHS Audit of LLB plant yard workplaces and related operations undertaken at maximum 6 monthly intervals) using the Audit Criteria.

Property Asset Operations – Offices	Regional EHS Manager	Workplace EHS Audit of LLB office workplaces undertaken at maximum one year intervals using the Audit Criteria.
2nd Party Workplace Audits (independent external engaged by LLB)	Regional EHS Manager / Head of EHS Integrated Project	Facilitating 2nd party auditor(s) engaged by LLB to undertake an audit of an LLB workplaces.
3rd Party Workplace Audits (wholly independent of LLB and not engaged by LLB)	Head of EHS	Normally annual at the discretion of the Head of EHS as notified by clients or government agencies such as Office of the Federal Safety Commissioner.
Internal implementation audit of the LLB EHS Management System and Legal Conformity at workplace level.	National Team Head of EHS	A LLB audit of a minimum sample of workplaces every 12 months using the Audit Criteria for the *sample size outlined.

* The sample size is determined as the square root of all projects currently in delivery for a region rounded to the nearest whole number (e.g. square root of 15 sites = 4.0 rounded to the nearest whole number), with the selection of projects based upon consideration of the following criteria:

- High risk construction work being undertaken;
- Operational support for a nominated project;
- Number of critical incidents; and
- Other criteria as notified by the Head of EHS.

7.0 CONDUCTING AUDITS

Audits are conducted by a person(s) independent of the day-to-day production/operations of the workplace nominated for audit. Personnel conducting audits must have undertaken recognised external accredited auditor training and be determined competent in carrying out EHS Management System audits by successful completion of an external accredited auditor training course. The auditor training and related qualification achieved must have included the specific discipline to be audited, i.e. occupational/work health and safety to AS/NZS4801 or environment to AS/NZS ISO14001.

Workplace Managers are expected to actively participate in the audit process; non-attendance at both the opening and closing meetings of any audit undertaken to this procedure could result in a non-conformity where effective operational control of the workplace is identified as deficient by the audit process.

8.0 AUTHORITY TO AUDIT

The Head of EHS through the Managing Director is expressly authorised to direct a broad, comprehensive range of EHS MS external and internal auditing across LLB. The Head of EHS and related EHS personnel, including consultants engaged to undertake EHS MS audits, are authorised to have full, free, and unrestricted access to all functions, property, personnel, records, accounts, files and other documentation of LLB related to determining the effectiveness of the Environment, Health Safety Management System. All information accessed is strictly used for audit purposes only and remains confidential to LLB.

9.0 AUDITOR COMPETENCE

All auditors shall be appropriately qualified in accordance with AS/NZS ISO 19011 and Part 7 of this procedure.

10.0 AUDIT RATING

All internal EHS MS audits are undertaken to the requirements of this procedure using the audit criteria (tool) developed for projects / workplaces and RBU use. Audits findings shall be scored based on the criteria outlined in Table Two. A total score is calculated by the actual score achieved divided by the total possible score multiplied by 100. The Head of EHS may change or include additional scoring criteria as the standard of conformity increases in a particular division.

11.0 AUDIT FINDINGS

Audit findings are published as a report within 10 working days of the audit and provided to the Workplace manager and other interested parties as required. The time frame for rectification of issues raised in any audit shall not exceed 30 days. Where the risk associated with an identified non-conformity is rated as medium, high or very high, the time frame for rectification shall be determined by the Head of EHS.

The audit report must separate each audit finding, to enable a clear understanding of the non-conformity. Each finding should include a reference to the appropriate GMR or Standard requirement, identified by reference to the relevant part of the LLB EHS MS manuals and related documents.

The audit findings are used to achieve continual improvement by review of the EHS Management System Manual and related procedures and forms and the implementation of these systems and processes at RBU and workplace level.

Internal audits outlined in Table One will normally be recorded in Enablon and will include a record of the finding, the agreed action plan (where appropriate) and the anticipated cause of the non-conformity.

Table Two: Audit score and Nonconformity Guide

Total Audit Outcome Score	$\frac{\text{Total (Actual)}}{\text{Total (Possible)}}$ X 100 = **SCORE** **%**	
SCORE	**PERFORMANCE OUTCOME**	
<75%	**Improvement Opportunity**	
75-89%	**Business as Usual**	
90-95%	**Stretch**	
>95%	**Outstanding Performance**	
Guide to Scoring and Nonconformities		
Conformity	Requirement is fulfilled	**4**
Opportunity for Improvement	Where full conformity has been achieved, but the potential to reach a higher standard is possible	**3**
Minor non-conformity	Partial non-fulfilment of a documented requirement or minor gaps in implementation.	**2**
Major non-conformity	Non-fulfilment of a documented requirement or systemic (major) implementation breakdown or lack of procedure to meet the requirements of the Standard.	**1**

APPENDIX 20 INCIDENT REPORTING AND MANAGEMENT PROCEDURE

INCIDENT REPORTING AND MANAGEMENT PROCEDURE

DOCUMENT HISTORY

Content Owner	Ross Trethewy

Issue	Change Type	Amendment Summary	Author	Date
1.0	Publish new		Brad Crockett	25/08/2014
1.1	Amendment	Reference to Register of Injuries in section 10.5	Brad Crockett	22/09/2014
1.2	Amendment	Minor amendments including changes to incident investigation and escalation requirements	Brad Crockett	12/01/2015
1.3	Amendment	Changes to Escalation requirements in section 10.3	Ross Trethewy	25/02/2015
1.4	Amendment	Change to responsibility for Enablon incident publishing	Brad Crockett	25/06/2015
1.5	Amendment	Change to responsibility for Enablon incident publishing	Brad Crockett	19/11/2015
1.6	Amendment	Remove business reportable incidents from system, update definitions	Brad Crockett	18/12/2015
1.7	Amendment	Addition of requirement to complete Five Point Email EHS Incident Notification Template.	Graeme Mauger	22/07/2016
1.8	Amendment	Formatting and clarification of Notifiable Incident Reporting and inclusion of Branding update and removal of further references to Business Reportable Incidents. Update to Table 1 Section10.2 Added: Appendix 3 Assessment of electric Shock Incident Circumstances. Appendix 5 Five Point Email Notification Template Appendix 6 Defence Projects Incident Reporting Guide	Ross Trethewy	10/03/2017
1.9	Amendment	Appendix 6 Defence reporting guide updated to reflect new Defence chart.	Ross Trethewy	08/09/2017
1.10	Amendment	Change to the management review section (11.0)	Ross Trethewy	13/11/2017

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1.0 QUICK REFERENCE GUIDE

I Need To Know	Section Title	Page
Whether an injury is to be recorded as an LTI, MTI or FAI?	Injury Classification	8
How to assess the severity of an incident	Assessment	14
Who to notify and when	Notification & Reporting	15
What Regulators I need to notify	Notifiable Incident Classification	9
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2.0 INTRODUCTION

This procedure links to the Lend Lease Building (LLB) Crisis Management Plan and the project or workplace Environment, Health & Safety Management Plan. It outlines the process of incident definition, escalation, notification and reporting for all Lendlease Building workplaces including the use of the corporate risk and compliance reporting tool Enablon. The process is detailed in the flowchart at Appendix One.

3.0 PURPOSE

This procedure relates to any incidents that occurs across Lendlease Building business undertakings (including joint ventures where LLB is the Principal Contractor with management or contol of the workplace) including those related to, or interfacing with local government authorities, the public and the Office of the Federal Safety Commissioner (OFSC).

The purpose of this procedure is to provide incident reporting information and related definitions to achieve a common understanding for the recording, reporting and investigation of Environment, Health and Safety (EHS) incidents across Lendlease Building business undertakings. The definitions have been developed to capture and learn from the negative consequences or positive actions of Lendlease Building work activities and other business processes to better understand and manage risks associated with LLB business undertakings and improve overall EHS management performance.

4.0 SCOPE

This procedure applies to all LLB workplaces.

5.0 RELATED DOCUMENTS

The related documents available for use in conjunction with this procedure are as follows:

- Lendlease Building Business Unit Crisis Management Handbook
- Project or Workplace EHS Management Plan

- EHS Risk Management Procedure
- Impacts & Hazards Risk Assessment Template
- Right of Entry Flowchart
- WHS/OHS/OSH legislation in each Australian jurisdiction
- Protection of the environment legislation in each Australian jurisdiction
- AS1885.1 Workplace Injury and Disease Recording Standard
- OFSC WHS Performance Reporting Pack
- Routine Complaint Form
- Incident Investigation Report Template
- Witness Statement Form

6.0 DEFINITIONS

Additional Reporting Criteria:
Means client reporting requirements to client contractual obligations.

Collaboration tool:
An IT system such as Project Web or Aconex used to assist with project communication between all parties involved in that project.

Consequence
Is the outcome of an EHS incident which typically includes actual or a potential for first aid treatment, a medical treatment injury, a lost time injury, property damage, damage to plant or equipment and environmental harm or nuisance – is known in Enablon as an *Impact*.

Corrective Action:
Actions resulting from an EHS incident investigation report to implement control measure(s) to prevent a repeat of the incident and to eliminate or reduce the risk.

Short term corrective action to isolate the risk is often a temporary measure and must be implemented immediately following the incident to ensure that further harm resulting from the incident does not occur. These actions may include isolation of plant, equipment or services, placing environmental barriers to prevent further leakage, cleaning up a spill, closing off an area or positioning a warning sign and making urgent repairs.

Long term corrective action to prevent recurrence involves more long term risk control measures such as a change to an EHS procedure, ongoing training, new plant and equipment or personal protective equipment and redesign of a work area or task. Follow-up corrective action must aim to eliminate or minimise the risk of recurrence in accordance with the Hierarchy of Control.

Critical Incident:
Refer to the definition outlined in Appendix Two (ref LL Group EHS v2 December 2015).

Enablon:
A web based system designed to capture, record and report incidents ranging in severity from pending critical incidents requiring urgent communication; to incidents used to communicate lessons learned; to minor incidents requiring no further action. Observations related to good or bad at risk behaviours and related potential consequences are also recorded in Enablon.

Critical Incidents when confirmed are communicated across Lendlease Corporation via alert notifications issued from Enablon to selected email recipients globally.

Event:
An incident or occurrence from sources internal or external to the organisation that affects achievement of objectives, either positively or negatively.

EHS Incident:
An uncontrolled event or breach of control measures with actual or potential negative consequences/impact to people, property, plant and equipment, reputation or the environment. Examples include:

- A person trips over an electrical cable lying across a walkway (event), and falls to the ground sustaining minor injuries (consequence).
- A box of materials falls off an overhead cabinet shelf when a door is opened (event) and results in a shoulder injury to a person positioned below (consequence).
- A handbrake holding a parked vehicle fails causing the vehicle to roll from its stationary position and collide with a wall (event) causing minor property damage (consequence).
- A sediment laden muddy water discharge drains from a site during heavy rain (event) and flows into a storm water drain and nearby creek (impact).
- An excavator blows a hydraulic hose (event) and oil spills onto the ground (impact).

HOSF:
Means the Head Office Service Function for EHS located within the LLB head office.

Impact:
Means any change to the environment whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects, e.g. noise, dust, flora and fauna, traffic disruption, waste, light spill and sediment or pollution of waterways, Aboriginal or European heritage - is known in Enablon as an *Impact*.

Incident Investigation:
The gathering and analysis of information to determine the cause of an incident and to identify root causes and any contributory factors. The investigation process involves inspecting the scene of the incident and interviewing witnesses to determine factual information regarding what happened, when and where it happened, who was involved and how and why it happened.

Injury:
May include physical injuries such as a cut, burn, or fracture as well as instances of diagnosed medical conditions related to psychological trauma such as anxiety, stress or migraines related to work events including traumatic incidents, bullying or harassment or exposure to hazardous substances - is known in Enablon as an Impact.

Notifiable Incident:
An EHS incident that meets the criteria of legislation in a particular legal jurisdiction requiring notification to Regulator(s) of that jurisdiction of the details of that incident within a prescribed timeframe.

Observation:
Is an EHS related visual assessment of work practices or work conditions (safe or at risk) designed to recognise good behaviours, promote behavioural change or improve work conditions. It is aimed at encouraging and facilitating people on site to:

- promote frequent work observations and Incident & Injury Free conversations;
- record both good and bad EHS related behaviours and take effective actions to remedy at risk behaviours or work conditions;
- provide data and trends on safe and unsafe practices at a project, business, region and global level to target effective remedial action where necessary;
- allow other people unrelated to the particular observation or site to become aware of and benefit from the lessons learnt by others;
- identify unsafe behaviours, practices or conditions before an EHS incident occurs to enable preventative action to be instigated;
- facilitate and promote workplace consultation and discussion.

Examples include:

- A worker is observed undertaking high risk work at height and all identified control measures are adequately implemented to the requirements of the Safe Work Method Statement (i.e. positive and safe behaviour, good observation).
- A guardrail to a work platform at height is identified as missing (i.e. at risk bad observation with hazardous work conditions).
- The door to an electrical panel is left open with potential for contact with live electrical components (i.e. at risk bad observation with hazardous work conditions), but no contact with the electrical components occurs (i.e. bad observation no consequence event).
- A segregated waste bin containing concrete rubble is identified as contaminated with plasterboard (i.e. the wrong waste stream), but is identified and rectified before being taken away (i.e. no impact event).
- Sediment controls are absent or have not been maintained around a storm water inlet, reducing the efficiency of the control measure and leading to the potential for sediment loading of the receiving drainage lines/eco-system (i.e. bad observation).

Office of the Federal Safety Commissioner (OFSC):
Federal accreditation body which formally accredits Lendlease Building to undertake Commonwealth of Australia (Federal Government) funded construction projects. Specific OFSC definitions include:

- *Scheme Project* - term used by the OFSC for a project that has a proportion of Federal Government funding that has been registered with the Office of the Federal Safety Commission;
- *Dangerous Occurrence* - An incident where no person is injured, but could have been injured, resulting in Serious Personal Injury (which requires a week or more away from work), Incapacity or Death. Also commonly called a 'near miss'. Only dangerous occurrences that are required to be reported under the WHS legislation covering notifiable incidents in the jurisdiction the project is being undertaken are required to be reported to the OFSC.
- *Notifiable Incident* - A notifiable incident is one resulting in the death of a person, a serious injury or illness of a person, or a near miss event/dangerous occurrence, that is required to be notified under the WHS legislation covering notifiable incidents in the jurisdiction in which the project is being undertaken.
- *Lost Time Injury* - A work-related occurrence that results in a permanent disability or injury resulting in time lost from work of one day/shift or more. Permanent disability is as defined in the legislation of the jurisdiction in which the project is being undertaken.
- *Medical Treatment Injury* - A work-related occurrence that results in treatment by, or under the order of, a qualified medical practitioner (see below), or any injury that could be considered as being one that would normally be treated by a medical practitioner but does not result in the loss of a full day/shift

Pending Critical Incident:
An EHS incident that meets certain established (pre-set) criteria when entered in Enablon and is automatically flagged as a Pending Critical Incident awaiting further evaluation by HOSF.

Potential EHS Incident:
A latent issue that has been identified that has not yet come into existence or an incident that is/was possible but is not yet actual; also known as a near miss or a near hit.

Preventative Action:
Necessary steps taken to prevent an incident or recurrence of a risk.

Regulator:
A public authority or government agency responsible for exercising autonomous authority over some area of law and governance in a regulatory or supervisory capacity. Examples include the WorkCover Authority and the Environmental Protection Authority in NSW.

Time lost through injury:
The time lost in days or part thereof per occurrence of injury/disease. For the purposes of this determination, an upper limit of 12 months (220 days) off work is assigned to any fatality or long term injury/illness. For lost

time injuries the total days lost is determined by the days that the person is rostered to work in a given period. For example, an office worker carries out work duties on average 20 working days in a month less any public holidays or other leave and a construction worker on average 22 days in a month less any public holidays, rostered days off or other leave. Overtime is excluded from the calculation.

7.0 INJURY CLASSIFICATION

Actual injury events shall be classified and recorded in accordance with Australian Standard 1885.1 and the Australian Government Office of the Federal Safety Commissioner (OFSC) guidance as follows:

First Aid Injury (FAI):
Basic treatment given to an injury/illness victim, usually where the injury/illness is slight and does not require medical treatment, or following a visit to a medical practitioner, and not resulting in the loss of a full day/shift, the following on their own would not normally be considered medical treatment, and should be recorded as a first aid injury

- Administration of tetanus shots or boosters;
- Diagnostic procedures such as X-rays, electro cardio graph (ECG) or laboratory analysis, unless they lead to further treatment (in which case they will be an MTI or LTI);
- Referral to/treatment by a psychiatrist where the diagnosis is not a result of a workplace occurrence;
- Cleaning abrasions/ wounds with antiseptic and applying a bandage;
- Applying cold compress or limited soaking of a bruise;
- Cleaning/flushing the surface of a minor burn and applying antiseptic;
- Irrigation of eye injuries and removal of non-embedded objects;
- One time administration of oxygen;
- Soaking, application of hot-cold compresses, and use of elastic bandage on sprains immediately after surgery;
- Physical examination, if no condition is identified or medical treatment is not administered

Medical Treatment Injury (MTI):
To enable accurate reporting of total recordable incident frequency rate or TRIFR (i.e. Lost Time Injuries [LTI] + Medical Treatement Injuries [MTI] per million hours worked) the OFSC definition of MTI is used as follows.

An MTI is defined as a work-related occurrence that results in treatment by, or under the order of, a qualified medical practitioner (see below), or any injury that could be considered as being one that would normally be treated by a medical practitioner but does not result in the loss of a full day/shift or more (i.e. which is then classified as an LTI).

A qualified medical practitioner is defined as a person with a university medical degree. The following would normally be considered a medical treatment injury (MTI):

- Treatment of partial or full thickness burns;
- Insertion of sutures;
- Removal of foreign bodies embedded in the eye;
- Removal of foreign bodies from a wound if the procedure is complicated by the depth of embedment, size or location;
- Surgical debridement (removal of dead or infected tissue);
- Admission as an in-patient to a hospital or equivalent for treatment or observation;
- Application of antiseptics during second or subsequent visits to medical personnel;
- Any work injury that results in a loss of consciousness;

- Treatment of infection;
- Use of prescription medications (except a single dose administered on the first visit for minor injury or discomfort);
- Treatment (diagnosis and evaluation) by a Psychiatrist for mental illness or stress as a result of a workplace occurrence;
- Treatment of fractures by use of casts, splints or other professional means of immobilization;
- Use of a series (i.e. greater than 3) of physiotherapy or other professional treatments for sprains or strains.

Lost Time Injury (LTI):
Is defined by AS1885.1 as an occurrence that resulted in a fatality, permanent disability or time lost from work of one day/shift or more. The Office of the Federal Safety Commissioner (OFSC) and Enablon also use the equivalent definition. A permanent disability is defined in the legislation of the jurisdiction in which the project is undertaken.

Note: As per AS1885.1 in the case of part-time workers, if a person is away from work due to a lost-time injury/disease for one whole day or shift, irrespective of how many hours constitute that shift, they are considered to have satisfied the threshold of the one day/shift time lost.

All commuting injuries that occur during travel while not on work related duties or during a recess period and result in a fatality, permanent disability or time lost from work of one day/shift or more are not classified as a lost time injury; e.g. travel between home and the workplace, travel to technical school for training associated with employment and travel to receive medical treatment for an injury sustained at work.

Where an injury or illness is sustained at work but does not immediately result in a fatality, permanent disability or time lost from work of one day/shift or more but this result occurs at a later date, e.g. medical operation required months or years after a work related injury or illness, then the LTI occurs at the later date that the time lost is incurred. In this circumstance and where an aggravation to a pre-existing injury occurs that results in (further) lost time, consultation must be undertaken with the Regional EHS Manager.

8.0 NOTIFIABLE INCIDENT CLASSIFICATION

In addition to any internal escaltion and reporting requirements outlined in this procedure, EHS incidents meeting certain thresholds established under relevant legislation require mandatory reporting to the Regulatory Authority as follows:

Environmental Incident

An activity that has caused or has the potential to cause pollution, material environmental harm or significant environmental harm without taking all reasonable and practical measures to minimisie or prevent the harm. Each legal jurisdiction gives a definition of environmental harm which includes a monetary value of the event that includes the estimated clean-up and restoration costs as follows:

ACT Material harm $5,000, Serious harm $50,000

NSW Material harm $10,000

NT Material harm less than $50,000, Serious harm $50,000

QLD Material harm $5,000, Serious harm $50,000;

SA Material harm $5,000, Serious harm $50,000

TAS Material harm $5,000, Serious harm $50,000

VIC Material harm $5,000, Serious harm $50,000

WA Material harm $20,000, Serious harm $100,000

8.1 Work Health and Safety Incident

Harmonised Legislation Jurisdictions (ACT; NSW; NT; QLD; SA; TAS, Commonwealth)
An activity that has caused or has the potential to cause one of the following requires notification to the Regulator:

- the death of a person; or
- a serious injury or illness of a person; or
- a dangerous incident.

Where:
A serious injury or illness of a person
Means an injury or illness requiring the person to have:

- immediate treatment as an in-patient in a hospital; or
- immediate treatment for:
- the amputation of any part of his or her body; or
- a serious head injury; or
- a serious eye injury; or
- a serious burn; or
- the separation of his or her skin from an underlying tissue (such as degloving or scalping); or
- a spinal injury; or
- the loss of a bodily function; or serious lacerations; or
- medical treatment within 48 hours of exposure to a substance; or
- any other injury or illness prescribed by the regulations, but does not include an illness or injury of a prescribed kind.

A dangerous incident
Means any incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person's health or safety emanating from an immediate or imminent exposure to:

- an uncontrolled escape, spillage or leakage of a substance; or
- an uncontrolled implosion, explosion or fire; or
- an uncontrolled escape of gas or steam; or
- an uncontrolled escape of a pressurised substance; or
- electric shock; or
- the fall or release from a height of any plant, substance or thing; or
- the collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations; or
- the collapse or partial collapse of a structure; or
- the collapse or failure of an excavation or of any shoring supporting an excavation; or
- the inrush of water, mud or gas in workings, in an underground excavation or tunnel; or
- the interruption of the main system of ventilation in an underground excavation or tunnel; or
- any other event prescribed by the Work Health & Safety Regulations 2011, but does not include an incident of a prescribed kind.

Victoria Jurisdiction

Any incident which results in one of the following requires notification to the Regulator:

- death of a person or life threatening injuries;
- a person requiring medical treatment within 48 hours of exposure to a substance;
- a person requiring immediate medical treatment for:
  - amputation of any part of the body
  - a serious head or eye injury
  - the separation of skin from underlying tissue
  - electrical shock
  - a spinal injury
  - the loss of bodily function
  - serious lacerations
- any incident involving equipment which exposed a person in the immediate vicinity of the equipment to an immediate risk through:
  - the collapse, overturning, failure or malfunction of, or damage to, plant that is required to be licensed or registered;
  - the collapse or failure of an excavation or of any shoring supporting an excavation;
  - the collapse or partial collapse of a building or structure;
  - an implosion, explosion or fire;
  - the escape, spillage or leakage of any substance including dangerous goods;
  - the fall or release from a height of any plant, substance or object; or
  - the following events in a mine:
    - (i) the overturning or collapse of any plant; or
    - (ii) the inrush of water, mud or gas; or
    - (iii) the interruption of the main system of ventilation.
  - In addition, a notifiable incident at a quarry should also be notified to WorkSafe.

Western Australia Jurisdiction

Any incident which results in one of the following requires notification to the Regulator:

- at a workplace or at a residential premise, an employee incurs an injury or is affected by a disease, that results in the death of the employee or is a prescribed injury;
- at a workplace, a person who is not an employee incurs an injury in prescribed circumstances that results in the death of the person or is a prescribed injury

A prescribed injury includes:

- a fracture of the skull, spine or pelvis;
- a fracture of any bone -
  - in the arm, other than in the wrists or hand;
  - in the leg, other than a bone in the ankle or foot;
- an amputation of an arm, a hand, finger, finger joint, leg, foot, toe or toe joint;

- the loss of sight of an eye;
- any injury or prescribed disease other than an injury of a kind referred to immediately above which, in the opinion of a medical practitioner, is likely to prevent the employee from being able to work within 10 days of the day on which the injury occurred

9.0 OTHER NOTIFIABLE INCIDENT REQUIREMENTS

Federal

The OFSC as part of its accreditation of Lendlease Building to participate in direct or indirect Federal funded projects requires notification of the following:

- All fatalities on both a Scheme and non-Scheme project irrespective of the project value.
- Any incident resulting in an LTI on a Scheme and non-Scheme projects, and a report provided within 48 hours if a Notifiable Incident, otherwise a report provided within 3 weeks;
- Any MTI or dangerous occurrence on a Scheme project and a report provided within 48 hours if a notifiable incident, otherwise a report provided within 3 weeks).

Defence Projects

Refer to Commonwealth reporting requirement 8.1 of this procedure and Defence Incident Reporting Guide Appendix Six.

Victoria

Energy Safe Victoria requires mandatory reporting of any electrical incident that causes or has the potential to cause:

- death or injury to a person; or
- significant damage to property; or
- serious risk to public safety; or
- involves accidental contact with any electrical installation; or
- electric shock as a result of direct or indirect contact with any electrical installation

Western Australia

Energy Safety Western Australia requires mandatory reporting of EHS incidents such as near misses, injury to persons or property damage relating to fuel gas (Natural Gas, LP Gas, CNG, LNG) to the Director of Energy Safety.
They further require all electrical shocks and electrical accidents (irrespective of seriousness) to be reported to the electrical network provider or if they cannot be identified, to Energy Safety.

New South Wales

Department of Fair Trading NSW requires mandatory reporting of serious electrical incidents which are defined as:

- Where a person dies or suffers permanent disability,
- is hospitalised,
- receives treatment from a health care professional, or
- is unable to attend work for any period of time

South Australia

The Office of the Technical Regulator requires mandatory reporting of all electrical incidents. All serious incidents involving gas must also be reported to the Office of the Technical Regulator; this includes:

- Incidents resulting in death

- Any incident where a person requires medical assistance
- Gas incidents resulting in damage to property of $5,000 or more
- Gas incidents involving a gas infrastructure pipeline (operating above 1,050 kPa) resulting in any injury or damage to property, or incidents requiring the attendance of a fire brigade

Queensland

The Department of Justice & Attorney General requires mandatory reporting of serious electrical incidents or dangerous electrical events. A serious electrical incident includes where a person:

- is killed by electricity;
- receives a shock or injury from electricity, and is treated for the shock/injury by, or under the supervision of a Doctor;
- receives a shock or injury from electricity at high voltage, whether or not the person is treated for shock or injury by or under the supervision of a Doctor

A dangerous electrical event is one where:

- A person, for any reason, is electrically unsafe around high voltage electrical equipment, even if the person doesn't receive an electric shock or injury.
- Significant property damage is caused by electricity or something originating from electricity e.g. electrical fire.
- Unlicensed electrical work is carried out.
- Unsafe electrical work is carried out.
- Unsafe electrical equipment or electrical equipment that does not have electrical equipment safety system (EESS) approval markings.

The Department of Employment, Economic Development and Innovation requires mandatory reporting to the Petroleum and Gas Inspectorate of any prescribed incident which includes any service strike or injury.

Northern Territory

WorkSafe NT administers the Electricity Reform (Safety and Technical) Regulations 2011 and requires mandatory reporting of all incidents of electric shock.

Australian Capital Territory

Where a serious electrical accident occurs, the Planning and Land Authority requires immediate mandatory reporting of the incident to the relevant electrical supplier.

A serious electrical accident is one where electricity causes, or contributes to:

- the death or injury of a person; or
- damage to property; or
- a fire.

The Planning and Land Authority also requires immediate mandatory reporting of the incident to the relevant gas supplier of any serious gas accident.

A serious gas accident means an accident in which gas causes, or contributes to:

- the death of a person; or
- injury to a person that requires medical attention; or
- damage to property where the reasonable cost of repair or replacement exceeds the amount prescribed under the regulations for this definition; or
- a fire.

10.0 INCIDENT RESPONSE

The sequence of response processes used for all incidents is as follows:

- Identification and initial actions
- Assessment
- Notification and reporting (internally and externally)
- Management of response
- Recording and investigation
- Management Review
- Close Out

10.1 Identification and initial actions

Following identification of the type of incident (e.g. medical / injury, hazardous materials spill, gas leak, fire / explosion) initial actions may include:

R **Remove** workers from immediate danger (if safe to do so).

A **Raise the Alarm** contact appropriate emergency services advising nature, status and exact location of the EHS incident and advise what action has been taken

C **Contain** the incident and its effects and make the area safe – preserve the scheme for investigation

E **Evacuate** workers if required

10.2 Assessment

An initial assessment is made of the level of severity by the first responder and where appropriate verified by the Construction/Workplace Manager.

The assessed severity level determines the appropriate response. This may include escalation for those incidents that cannot be managed by site resources alone. The response includes the notification procedure to be followed and the level (site or crisis) at which the incident is managed.

Factors considered in making the assessment are:

- Extent of injuries to personnel on site
- Incident recurrence frequency
- Public, governmental, media attention
- Complaints received from stakeholders
- Impact on local community health and environment
- Disruption caused to the public due to forced closure of utility/transport/energy infrastructure
- Level of damage to company/client/public property
- Liaison / support requirements for client response process
- Reputational impacts

Table One below provides guidance on EHS Incident and Observation classification:

Table One

Rating	Actual or Potential EHS Consequence
Very Large	Fatality due to occupational injury/illness, kidnapping of an employee, evacuation of employees due to threat of fatality. Irreversible on-site and/or off-site environmental damage, on site and/or off-site damage with clean up remedy work incurring a very large impact, i.e. significant environmental impact: permanent long term and extensive environmental damage, causing material harm to the environment.
Large	Injury or occupational illness that results in a permanent disability. Treatable on-site and/or off-site environment damage with clean up or remedy work incurring a large impact, i.e. significant environmental impact: permanent but localised environmental harm, causing material harm to the environment.
Medium	Injury or Occupational Illness that results in lost time injury resulting in a temporary disability; Significant environmental Impact: long term damage or pollution or degradation; clean up remediation or rehabilitation will require greater than 1 month, causing material harm to the environment.
Small	Occupational injury or illness that results in offsite medical treatment with no lost time injury. Short term localised damage or pollution or degradation; clean up remediation or rehabilitation will require up to 1 month, not causing material harm to the environment.
Very Small	Injury or occupational Illness that results in on site first aid treatment, Minor on site environmental damage, pollution or degradation event; clean up remediation or rehabilitation will require less than 24 hours, not causing material harm to the environment.

10.3 Notification and Reporting

On becoming aware on an EHS Incident, the Workplace Manager must assess the incident in line with the guidance provided in the section above and notify in line with Table Two below.

In order to determine the notification protocol required; Table Two below provides the following guidance:

For **Medium, Large** and **Very Large** Consequences/Impacts, reference should also be made to the Lendlease Building Business Unit Crisis Management Handbook and the guidance provided by those documents followed.

Note also that for the purposes of notification and reporting Medium also includes any incident or event that triggers the Enablon critical incident criteria; any incident or event notifiable to a Regulatory Authority; or any incident or event that results in an emergency service (i.e. ambulance or fire brigade or police) or regulatory authority or the media attending a project.

Table Two

Escalation Flow

		Consequence / Impact			
Notification to	Very Small	Small	Medium	Large	Very Large
Lendlease Group				Within 1 hour by Phone	
Managing Director				Immediately by phone	
Executive General Manager			#Immediately by phone and email/text		
RBU General Manager, Head of EHS			#Immediately by phone and email/text		
Regional EHS Manager		Within 1 hour by Phone & Email	Immediately by phone and email/text		
CM / PM / EHS Manager and/or Coordinator	Immediately by phone				
Supervisor	Immediately by phone				
Worker	Immediate notification to Lendlease Supervisor of any EHS Incident				

The notification referenced in the above chart (i.e. #immediately by phone and email/text) refers to an initial notification summary. In the first instance (i.e. within 1 hour) this shall include a brief notification by telephone and email/text outlining the preliminary circumstances of the incident or event at the workplace within 1 hour of the incident/event. Following on from this brief notification shall be a brief five point summary using the Five Point Email EHS Notification Template outlined in Appendix 5 within three hours that will enable more detailed briefing of senior management on the nature of the event and what escalation and resources are required to ensure an effective timely response.

In addition to the above internal notification, where an incident is notifiable to a regulator (see section 7 and section 8 above), a person conducting a business or undertaking or with management or control of work, must ensure that the regulator is notified immediately after becoming aware that a notifiable incident has occurred, arising out of the conduct of the business or undertaking. Before reporting a Notifiable Incident or Serious Injury the Lendlease Workplace Manager, or a nominated representative, must determine the details of the incident with the person conducting the works to confirm if it meets the criteria of a notifiable incident. Where the criteria meets a Notifiable Incident /Serious Injury under legislation the Lendlease Workplace Manager confers with the Person Conducting the Business of Undertaking to confirm who will report the Notifiable Incident to the Regulator.

Where the initial notification occurs over the phone, a record of the conversation including incident reference number must be documented; this can be done via diary entry. Where practicable all subsequent correspondence with statutory authorities is to be done in writing (using statutory forms where provided) and all correspondence both to and from Lendlease is to be retained.

Note: Any incident considered to be notifiable must be discussed with the Regional EHS Manager (or equivalent for integrated projects) before notification to the Authority occurs. If the Regional EHS Manager (or equivalent for integrated projects) is not contactable then discussion must occur with any state/territory EHS Manager in the first instance or alternatively in the second instance Head of EHS LLB Australia.

Any additional reporting criteria as required by the Project or Workplace EHS Management Plan should also be followed to ensure client contract conditions are met.

10.4 Management of Response

Site Level Response

Incidents managed at the site level are those in the **Very Small - Medium** category which is readily contained, for which there is limited or no need for external assistance and where the potential business and reputational impact is small.

Such incidents are normally managed by a local site team.

In the event of escalation to the **Medium**, **Large** or **Very Large** category, the site will assist in managing the response under the direction of the Crisis Management Team established pursuant to the Business Unit Crisis Management Handbook.

In the event of a Notifiable Incident, it is the responsibility of Construction/Project/Workplace Manager to ensure, so far as is reasonably practicable, that the incident site (including any plant, substance, structure or thing associated with the incident) is not disturbed until an inspector arrives or otherwise directs that it does not need to be preserved.

This does not prevent the person with management or control of the workplace from taking any action to assist an injured person, or taking any further action that is essential to make the area safe or to minimise the risk of a further notifiable incident occurring, or from taking any action associated with a police investigation or action for which an inspector or the regulator has given permission.

Managing Injury and Illness

Where an incident has resulted in minor injury or illness, a site First Aid Attendant shall be called to attend to the person. The First Aid Attendant must then record the treatment they provide in Enablon. The person may then return to their work.

Where an injury or illness requires medical attention, the site First Aid Attendant shall decide if it is safe to transport the person to the nominated medical practitioner or closest hospital or if an ambulance is required. If the First Aid Attendant assesses it to be safe to transport the person without an ambulance, the Workplace Manager or nominated representative shall arrange for suitable transport to be made available. Private vehicles are not to be used for this purpose.

Incidents involving an electric shock will be assessed using an Electrocardiograph in line with the assessment criteria outlined in Appendix Three.

In addition, whether the person is transported by ambulance or not, the Workplace Manager or their nominated management or supervisory delegate ***must accompany the person***. Where this is not reasonably practicable, arrangements should be made for a suitable escort to accompany the injured person.

Projects and workplaces should ensure that a *Medical Referral Pack* accompanies the injured worker and that a suitable duties list is made available to the treating doctor to facilitate effective worker return to full normal duties.

After ensuring the injured person is attended to, the manager responsible is required to enter the incident into Enablon per the requirements of section 10.5.

Where the injury is sustained by a Lendlease employee, Lendlease workers' compensation should be notified in line with the protocols contained within the *Medical Referral Pack*.

Managing Property Damage and Loss Incidents

In the event of property damage, theft, motor vehicle damage or other related incidents the requirement to report and investigate the incident will be determined by the Workplace Manager.

If plant or equipment is involved in an incident as a result of failure of the plant and equipment or its functionality, then the unit must be removed from service, isolated (locked out) and tagged out pending investigation. An external plant / equipment specialist shall be engaged to inspect and test the item as

required to verify it fitness for purpose and compliance with the manufacturer's recommendations and applicable legislation and standards. A written report from the specialist shall be obtained and retained on file and shall be included as part of the investigation process

The item of plant or equipment shall only be placed back into service when it is certain that the unit is clear of fault, or in the case that defects are found, when those defects are repaired.

Where plant is owned by Lendlease, the relevant plant manager must be advised; for leased plant and equipment, the lease company is to be notified.

Managing Complaints

Following the receipt of a complaint, the Workplace Manager is to implement the Lendlease procedure detailed in the Routine Complaint Form and determine the best way to manage the complaint.

Union Right of Entry

In response to an incident, the relevant union may arrange for a Union Official to visit the workplace. This right of entry in detailed within applicable WHS/OHS/OSH legislation and a Union Official has a right of entry to investigate a suspected breach, or to visit 'relevant workers' to consult and advise on health and safety matters, consistent with local legislative requirements. Advice on this process is summarised in the Lendlease Building Union Right of Entry flowchart.

Employee Assistance Program

Lendlease employees and their families are able to access confidential counselling and assistance via the Employee Assistance Program if required; this service may be of benefit to injured workers, their families and incident witnesses and can be contacted at:

Assure Programs: 1800 808 374

10.5 Recording and Investigation

Recording

EHS incidents including those involving injury, a near miss, property damage or environmental impact shall be recorded in Enablon by the Workplace Manager or nominated representative within 24 hours of the event. Injury/illness information can be recorded using the Lendlease Building Register of Injuries and entered into the Enablon online reporting system as soon as practicable.

Note - critical incident notifications in Enablon are to be published within three working days of the incident event/time.

Impacts or potential Impacts are entered into Enablon and action plans are then developed and entered for each event identifying the actions required and the responsible parties. Note that observations relate to unsafe or other deficient conditions which have the potential, if not corrected, to result in an incident event. All observations (good or bad) shall be entered into Enablon.

All action plans implemented as a result of an incident event or an observation shall identify the responsible party(s), the action to be taken and a target date for the action to be completed.

Where actual or potential consequences/impacts resulting from an EHS Incident entered into Enablon are assessed and identified as very large, large or medium, Enablon will automatically assign the incident as pending critical. The Regional EHS Manager (or equivalent for integrated projects) shall consult with the workplace on the circumstances surrounding the incident to assist with overall classification of the event for notification purposes. Appendix Two provides guidance on how an incident will be assessed and classified by the Head of EHS.

NOTE: Pending critical EHS incidents entered in Enablon can only be downgraded by HOSF, e.g. potential critical incident downgraded to no notification required.

Where the action party is a subcontractor or similar, the action plan shall be sent as a PDF document using the collaboration tool in place for that particular project. Any additional reporting criteria or other notifiable incident requirements are to be met. The Enablon Event Process Flow is outlined in Appendix Four.

Investigation

The purpose of an incident investigation is to determine the cause of an EHS incident and to identify any contributing factors and related root cause. This information is vital to allow the development of corrective and preventative action to prevent recurrence. The incident investigation report records the facts about what happened, when and where it happened, who was involved and how and why the incident happened. Incident reports are legal documents and so must report the facts only. It is important that the report is factual and does not contain any assumptions. Conclusions must be substantiated by facts gathered from the investigation. Hearsay should not be recorded within the report.

The form of the investigation will follow the process outlined in the Lendlease Building Incident Investigation Report Template. Critical Incidents use the same report template, however there is an expectation of those completing the investigation that greater analysis and detail is provided to identify root casues and preventative actions.

An incident investigation shall be undertaken as follows:

- For all events confirmed as Critical
- For all events that result in a lost time injury; and
- For any other event where directed by HOSF

Inspect the scene

To determine the cause of the incident, the nominated investigator shall inspect the scene of the incident and interview the persons involved, including any eye witnesses, immediately and no later than 24 hours following the incident. This ensures that the site conditions at the time of the incident can be documented and the recollections of the people involved are still fresh regarding what happened.

All observations regarding personnel, materials, plant and equipment will require the relevant workplace records to be included in the report (and uploaded into Enablon). When inspecting the scene and interviewing witnesses, the incident investigator should observe and ask about the following factors:

Work Task
If the incident occurred as a result of undertaking a work task, verify whether a Safe Work Procedure, Safe Work Method Statement (SWMS) or Safe Operating Procedure (SOP) or equivalent existed for that task at the time of the incident and if so, whether the people involved in the incident had been trained in it. View records to verify findings.

Materials, Plant & Equipment
Inspect the current condition and view the maintenance history records of any plant and equipment; observe the functionality of any safety mechanisms (e.g. machine guards, cut-out switch), determine whether personal protective equipment (PPE) was required and worn at the time of the incident; consider whether design was a contributing factor and whether a safer alternative method, material or substance existed that could have been used.

Work Environment
Inspect the general tidiness of the workplace; document the layout of the workplace and determine if it contributed to the incident; observe and record any other factors such as weather, temperature, pressure, noise, lighting, space, number of workers/ activities in the area, clearance, ventilation, access surfaces or any other environmental condition that may have contributed to the incident. (Consider sketching the layout of the incident work area including the positions of people, plant and equipment and taking photographs of the scene from multiple angles).

Workers
Determine the level of experience and training of the people involved by reviewing training records, record of

competency e.g. high risk work licence and other qualifications; consider their physical capacity for the task and document whether they expressed any possible reasons for the incident related to their own condition. Note any disclosure of discussions, disagreements or arguments regarding the work task with reference to specific a person or persons.

Management
Determine the level of supervision and training provided by the relevant PCBU(s) or other persons with management control of the work; identify any EHS procedures, guidelines or forms relative to the task, required to eliminate or control identified risks. Review workplace records to determine if they were in use.

Interviewing Witnesses
When there are multiple conflicting stories from witnesses to an incident, it is necessary to take separate witness statements from each witness. Ensure that you establish whether they are an 'eye witness' or a 'circumstantial witness' from the question "Did you personally witness the incident"? Each witness signs and dates their statement once it is completed.The Witness Statement Form must be used for this purpose.

Note: In these instances, each witness should be interviewed separately and immediately following the incident. When conducting witness interviews, do not assume that you know what happened. Ask open ended questions (e.g. "What happened after that?"), avoid leading questions (such as "He then turned the machine back on, didn't he?") and do not interrupt the witness when they are providing their statement. Be wary of hearsay (what they have heard from other people rather than what they witnessed in person) and do not blame or intimidate the witness in a way that might influence their story (e.g. "Was this your fault?").

Determine the cause of the incident and identify root causes
Once the scene of the incident has been inspected, any witnesses have been interviewed and relevant workplace records have been reviewed, the findings of the investigation are documented on the Lendlease Building Incident Investigation Report Template and then uploaded with all supporting documentation into Enablon.

Note: the conclusions of an incident report need not be lengthy but must identify the cause of the incident and identify any contributing factors and root causes. This can be done with bullet points.

DO NOT make assumptions and report the facts only. If there are conflicting stories from witness statements and a lack of evidence to prove what is correct and true, state that you are unable to determine precisely what happened.

Example – EHS Incident root causes
A worker was carrying a box down a ramp when he slipped over, injuring his leg. This could have been due to a number of root causes, and the investigation process requires asking 'why' several times, such as:

- Why was the worker carrying the box down the ramp?
  - There are no stairs for access between levels at this location and the motorised trolley normally used was damaged and out of service.
- Why did the worker slip on the ramp?
  - The ramp design was steep and there was water on the ramp.
- Why was the ramp wet?
  - Due to a leak in overhead pipes.

All the above answers lead to other questions regarding procedures for carrying articles at the workplace, design of the ramp, maintenance of the water pipes and maintenance of the motorised trolley. All will require separate corrective actions to be allocated later in the investigation.

Determine the Risk Ranking
As the incident event has already occurred the need to assess the likelihood becomes less critical, except

when reviewing corrective actions, which will examine for example things like 'reduction in time exposed to hazard' and 'safer methods of achieving the outcome'.

The most important assessment in this incident investigation stage is the actual consequence or impact rating and the potential consequence or impact rating for the incident.

The 'actual consequence' or impact, relates to Table One, e.g. a first aid injury is rated as 'Very Small' and '3-6 months to clean up or remedy' is rated as 'Medium'.

The 'Potential consequence' or impact relies on asking "Could the incident have had a more significant outcome"? (Use the same table of consequence - Table One).

Example 1 - a brick falling from a scaffold may have grazed a worker's arm (first aid injury - insignificant) but the potential consequence could have involved broken bones had it hit the worker on the shoulder (LTI - 'medium').

Example 2 - a timber off-cut fell through a 500 X 500mm penetration due to the cover partially dislodging due to inadequate fixings. The incident is reported as a 'near miss', the actual consequence is rated as 'very small'. However, if the 'penetration' was above a work area and the timber had struck a worker, it would rate as a 'small' potential consequence, as the worker would need medical treatment, or, if there was potential for a worker to fall through the penetration, the potential consequence rating would be at least 'medium', as it would result in a Lost Time Injury or worse.

These consequences are divided into classifications according to the type of incident in Table One. There may also be more than one classification relevant to the incident, e.g. a chemical spill may include environment - damage to grasses and soil contamination; and health and safety - eye irritation from fumes. According to the table, environment would rate 'small', and health and safety would rate 'very small'. The highest rating ('small') would be recorded as the 'actual' consequence or impact rating for the incident. Both the actual and the potential consequence ratings are required in the incident investigation report.

Implement Corrective & Preventative Actions

Following an incident, corrective action is required to isolate the hazard, or reduce the risk and to prevent an incident recurrence (repeat). Initial corrective action to isolate the hazard is often a temporary control measure and must be implemented immediately following the incident to ensure that further harm resulting from the hazard does not occur. These corrective actions may include isolation of plant, equipment or services, placing environmental barriers to prevent further leakage, cleaning up a spill, closing off an area or positioning a warning sign and making urgent repairs.

Follow-up corrective action to prevent recurrence involves more long term control measures such as a change to a EHS procedure, ongoing training, new plant, equipment or personal protective equipment or a redesign of a work area or task. Follow-up corrective action must aim to eliminate or minimise the risk of recurrence in accordance with the Hierarchy of Control.

The Workplace Manager or Supervisor shall immediately notify all persons responsible for implementing corrective action and record this in Enablon. Time frames shall be set for completion of all corrective and preventative actions and the responsible Manager or Supervisor shall follow-up to ensure completion. All allocated actions must be implemented immediately where the risk is moderate or greater and not later than 30 days following an incident. (Note: There may be multiple corrective and preventative actions following an incident).

The Hierarchy of Control shall be followed when deciding on appropriate corrective and preventative actions.

Example - Corrective Action

Using the previous example of a worker slipping on the ramp whilst carrying a box, there are a number of potential corrective actions:

- Repair the trolley, implement a regular inspection and service routine;
- Repair the leaking pipes and implement regular inspections;
- Refresh the need for hazard reporting by all workers, through toolbox talks;

- Ensure workers are aware of the procedure for manual handling and weight restrictions;
- Modify hazard identification training provided for all workers
- Improve worker induction materials to reinforce hazard reporting procedures
- Provide WHS/OHS/OSH consultation training to Supervisors
- Reinforce corrective actions and procedures with a toolbox talk and training where the need is identified.

Preventative actions may also be identified through the investigation process and relate to a change implemented to address a weakness that could result in further EHS incident.

Example – Preventative Action
Using the previous example of a worker slipping on the ramp whilst carrying a box, there are a number of potential preventative actions:

- Provide alternative pedestrian access that eliminates the use of a ramp;
- Install steps next to the ramp;
- Resurface ramp with non-slip material.

11.0 MANAGEMENT REVIEW

According to the level of consequence allocated in the incident report, the corrective and preventative actions, once implemented, need to be monitored by the Workplace Manager to establish whether they have been effective in eliminating or controlling the identified hazards to an acceptable level. An acceptable level would mean that the incident and any similar event are unlikely to occur again.

The review may find that corrective actions have been successful, or that they need further discussion with the work team, to decide on further actions. These actions should be included in the Project Review Meeting Minutes and further documented and communicated through a Toolbox Talk, or an EHS Committee Meeting.

For all critical EHS Incidents, a management review meeting shall be held and chaired by the Head of EHS. Participants of this meeting would normally include in addition to the Head of EHS and other members of the HOSF for EHS, Project/Workplace management representatives, Senior RBU representatives including the Geneal Manager or Operations Manager and EHS representatives and the Australian business unit General Manager National Operations.

The review includes the incident circumstances, the proposed corrective and preventative actions to prevent recurrence, any additional action items agreed, e.g. National EHS Alerts or EHS Lessons Learnt bulletins to be issued, and the EHS incident report is accepted and signed off by the Head of EHS.

National EHS Alerts and EHS Lessons Learnt

As outlined above, during the management review, it may be identified that the circumstances and learnings from the incident under review warrant broader publication across the Lendlease Business to assist with ensuring that any opportunity for re-occurrence is minimised. In this circumstance, these documents shall be published by the Head of EHS and shared across the business.

12.0 CLOSURE

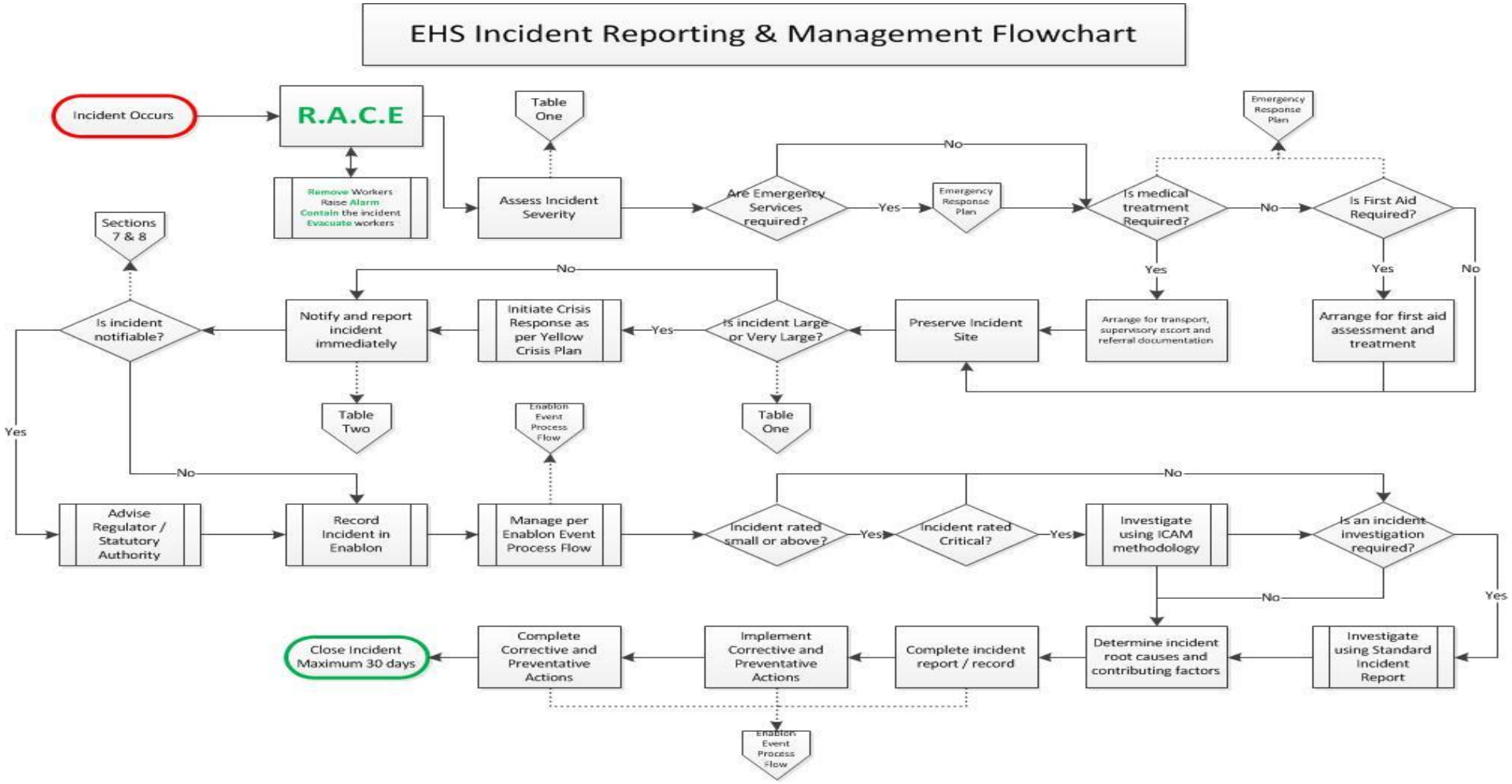
Once all corrective and preventative actions have been implemented, accepted as a suitable solution, then the incident can be closed subject to a review of the effectiveness of the control measures and preventative action implemented.

The ‘Closed Date’ is the date on which the corrective and preventative action(s) was accepted as suitable to control the hazard(s) and prevent the incident from reocurence. (Note: ensure that all corrective actions are closed in Enablon.)

13.0 MONITORING EFFECTIVENESS

Those control measures implemented as a result of a critical incident must be evaluated to determine their effectiveness. Following the closure of any critical incident an action plan is raised in Enablon to be implemented after 20-30 days. The aim is to monitor the effectivess of those actions implemented and to report on the adequacy of the control measures within 20-30 days after their implementation.

Appendix One: EHS Incident Reporting & Management Flowchart



Appendix Two: Critical Incident Definition

Any event that had the potential to result in, or has actually resulted in, LARGE or VERY LARGE impacts (refer to the Impact Table below)

Assessment of Critical Incidents

1. Actual Impact

Any incident where an ACTUAL injury or environment impact has been recorded as LARGE or VERY LARGE. These incidents must be published as 'Critical'.

Impact	Health & Safety	Environmental
5 Very large	Fatality due to Injury or Occupational Illness Kidnapping of an employee Evacuation of employees due to threat of fatality	Irreversible on-site and/or off-site damage; On-site and/or off-site damage with clean up or remedy work incurring a very large impact.
4 Large	Injury or Occupational Illness that results in permanent disability [II]	Treatable on-site and/or off-site damage with clean up or remedy work incurring a large impact.

2. Potential Impact

Any incident where the event had the potential to result in a LARGE or VERY LARGE impact.
Before finalising the classification of a Critical Incident, the reviewer must review the incident against the following questions:

- Could the event have had the potential to result in a LARGE or VERY LARGE impact?
- Did the absence, failure or inadequacy of a GMR risk event preventative and mitigating control(s) contribute to the incident?

If the answer is 'YES' to both of these questions, then the incident must be classified as 'Critical'.
Once classified as 'Critical Incident' an investigation must be conducted and if the facts reveal that the answer to any of the above questions was actually "NO" then the classification can be changed accordingly and justified in Enablon, only after discussion with the Head of EHS Lendlease Building Australia.

3. Management Discretion

A Regional Head of Safety in consultation with the Business Managing Director (MD) or CEO may also determine, at their discretion and based on the facts of the investigation, the classification of an incident. If the incident is downgraded, then an explanation must be included in Enablon before the event is closed out.
Notes:

3.1 Where the potential for multiple fatalities exists the event will be classified as potentially being 'catastrophic' for reporting purposes

3.2 Permanently Disabling means that due to a work-related illness or injury, a person is unable to work in their own or any occupation for which they are suited by training, education, or experience. Such injuries or illness may include:

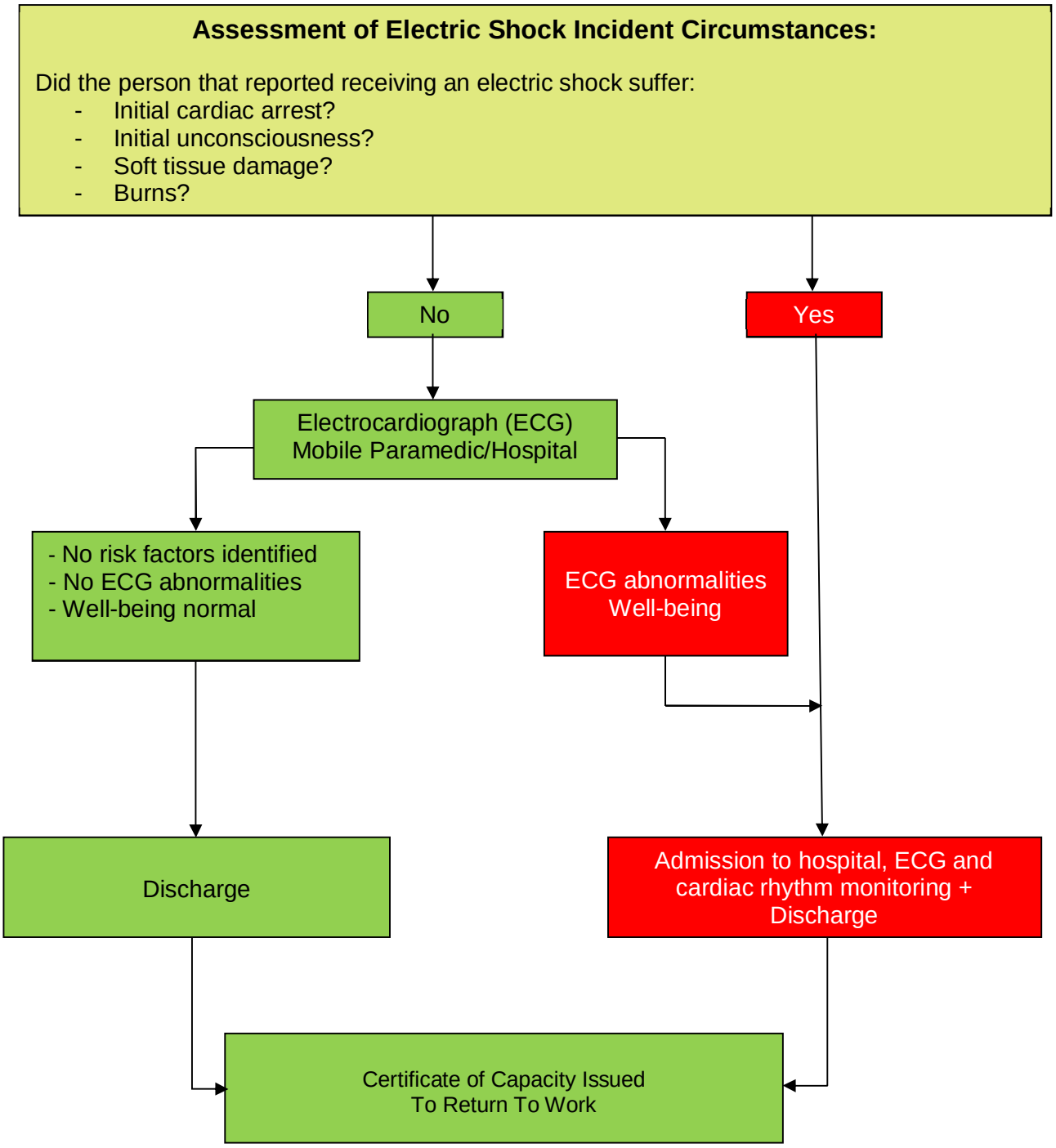
- Quadriplegia
- Paraplegia
- Amputation of a limb
- Permanent hearing loss
- Permanent sight loss
- Permanent sensitisation
- Permanent respiratory damage or lung function loss
- Permanent restricted impairment
- Chronic serious conditions/disease (including blood borne pathogenic)/degeneration
- Permanent nerve, system and/or organ damage
- Permanent loss of control or function of bladder, bowels or sexual organ.

3.3 When classifying incidents, it is important to determine not only the actual impact that has occurred, but to also nominate the impact that could have occurred if the incident's full potential had been realized. When assessing the potential impact from a credible worst case scenario, any unplanned factor that prevented the worse outcome from occurring should not be used as a reason for reducing the potential impact and for downgrading an event classification (e.g. if falling material lands near someone - and not on top of them – the person is unlikely to have deliberately positioned themselves in that precise location to avoid being struck by material falling from above).

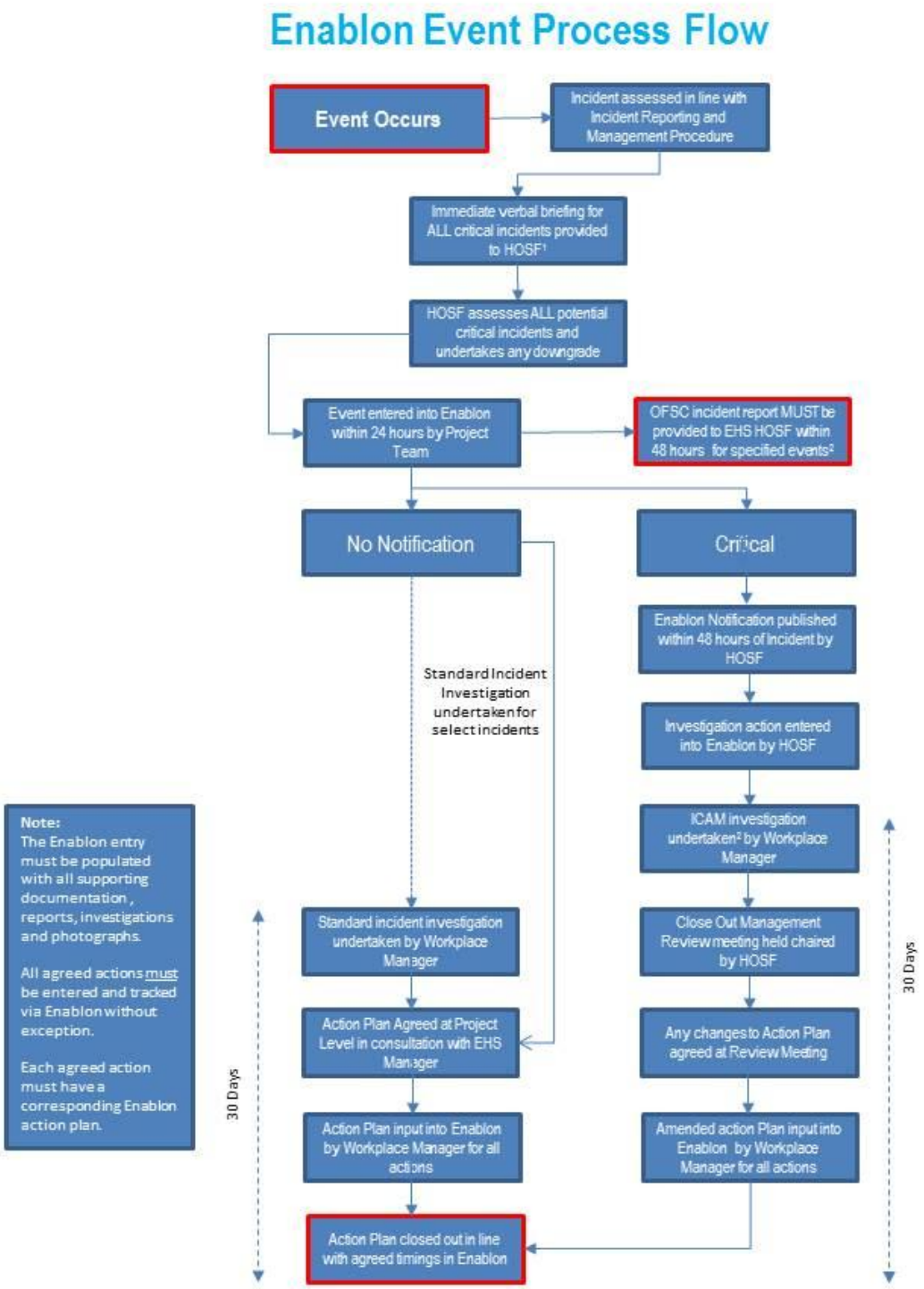
3.4 Where the application of a mitigating control is not feasible (or the risk event has no associated mitigating controls listed in GMR 4), the absence, failure or inadequacy of only preventative control(s) is sufficient to justify classification of an event as a Critical Incident.

Source: Definition V2 December 2015

Appendix Three: Assessment Of Electric Shock Incident Circumstances



Appendix Four: Enablon Event Process Flow



[1] HOSF – EHS Head Office Service Function
[2] Required for any LTI and on any Scheme project, also required for any MTI or dangerous occurrence – refer to the OFSC Incident Reporting Form

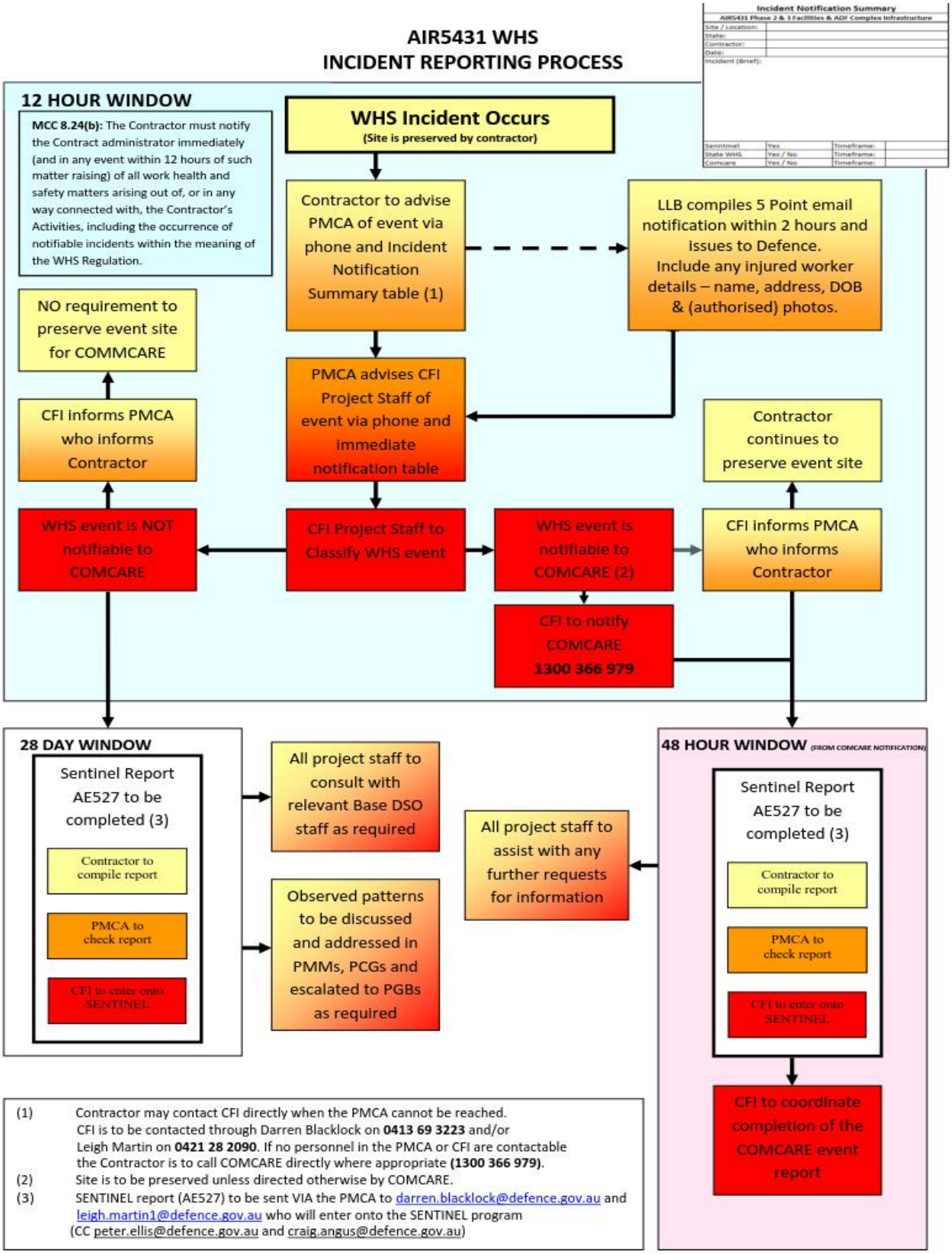
APPENDIX FIVE: FIVE POINT EHS INCIDENT NOTIFICATION TEMPLATE

This template aids the preparation of a five point email EHS incident notification for project key stakeholders. The five point email notification must be completed **within 2 hours** and also notified as per the Lendlease Building, Incident Management and Reporting Procedure. Please copy the table below into an email and **include only the facts as they are known at the time of the notification**. If events are not fully known or understood, then words such as 'initial information suggests' should be used to alert stakeholders that details continue to be gathered.

Event Type	Injury/Illness	Near Miss	Property Damage	Environment
	NA	Yes	N/A	N/A
Type of Incident	Electrical shock 240 volts.			
Event Details (i.e. what we know at the time)	A worker stated that he received a minor electric shock when using a Kango hammer drill which caused an electrical board circuit breaker to trip and isolate the electrical supply to an in-service emergency generator.			
Time/Date	1500 hrs (3pm) on Fri 22/07/2016.			
Location	Level 5 north east corner Building ICC.			
Brief Description	Initial information indicates a worker was drilling into a concrete floor slab on level 5 to install vertical reinforcement bar for an upstand to be formed up. The worker apparently observed a spark and heard a pop. Initial investigation indicates that the worker struck an electrical service located within the slab, which was not protected by a residual current device.			
Employer/ Subcontractor name	Terrific Reo Pty Ltd.			
List Immediate Actions	· Works were ceased. · Incident scene preserved to determine if incident notifiable. · Worker transported to hospital for Electrocardiograph. · Lendlease notified and attended the incident scene. · An initial review of the Drill, Cut, Core Permit and related drawings has determined that the service was not located on drawings or located in the services search using ground penetrating radar – investigation commenced. · Temp power reinstated to Emergency Generator.			
State/Territory Land Reporting	Is the incident Notifiable to the State/Territory Regulator? Yes **Classification:** Serious Injury /Illness, Dangerous Incident OR potential or actual Material Harm to the environment. **Refer:** Incident Reporting & Management Guide on Source for classification criteria. Note: Notify to the State/ Territory WHS Regulator only after notification to LLB Regional EHS Manager.			
	Did the Authority agree the incident was notifiable?			Yes
	Notification No.	2-117146	Comments:	Authority will dispatch an Inspector to investigate.
Commonwealth Land Reporting (i.e. Defence Projects)	Is the incident Notifiable to the Commonwealth Regulator? Yes **Classification:** Serious Injury /Illness, Dangerous Incident OR potential or actual Material Harm to the environment. **Refer:** Incident Reporting & Management Guide on Source for classification criteria).			
	PMCA Notified: Yes **Important Notes:** · **PMCA/Defence only will notify Comcare.** · **Incident scene must be preserved until PMCA provides clearance.**			

Note: Red coloured text is example text only.

Appendix Six: Defence Projects Incident Reporting Guide



APPENDIX 21 STORMWATER AND EROSION MANAGEMENT PROCEDURE

LENDLEASE BUILDING PTY LTD | 97 000 098 162

VICTORIA CROSS INTEGRATED STATION DEVELOPMENT

STORMWATER AND EROSION MANAGEMENT PROCEDURE

3/06/2020 | Revision No: 1

Procedure Revision Status				
Date	Revision (in numbers)	Purpose and Summary of Amendments	Reviewed by	Approved by
03/06/2020	1	Initial Revision	J Ambler	

*Note that all printed paper/hard copies of this document remain uncontrolled. The controlled copy of this document is found either in the project collaboration tool, within the Project Management Plan section, or other project specific database/server approved by the Regional EHS Manager / Head of EHS Integrated Project.

1. SCOPE OF PROJECT AND PROCEDURE

Project Details	
Scope of the Procedure	This Stormwater, Erosion and Sedimentation Management Procedure provides strategies and mitigation measures to manage disturbed areas of the site. It outlines appropriate measures to ensure that activities including excavated soil, stormwater, erosion, and sedimentation are managed appropriately during site establishment and construction of the project. It describes measures to be implemented during relevant construction activities and defines discharge protocols and treatment procedures that enable control of the impacts of the construction activities on potentially affected areas of adjacent water bodies. Refer to Section 1.1 and 3.1 of the Project EHS Management Plan for clarification on how the EHS Sub Plans and Procedures form part of the Lend lease Building (LLB) EHS management system.
Objectives of the Procedure	• To avoid erosion, contamination and sedimentation occurring, resulting from construction or demolition activities with a concentration on controls to minimise vehicular mud-tracking. • To control the quality of stormwater leaving the construction site, so that no unacceptable impact will intrude upon the natural watercourses and/or stormwater drains. • Erosion and sediment controls are to be effective and properly maintained at all times. • Apply water treatment procedures to monitor/treat retained stormwater to achieve acceptable water quality criteria. • To monitor the effects of activities and the effectiveness of mitigation measures
Scope of Works	This Procedure has been prepared based on the following scope of works: • Site establishment including vegetation trimming/removal, office and compound setup; • Detailed excavation and associated activities; • Construction of the Victoria Cross Metro Station (VCISD), and associated South Tower (OSD).
Key Issues and Risks	Excavation at the site is generally into sandstone bedrock, with bulk excavation completed by the Sydney Metro Tunnelling and Excavation contractor prior to VCISD works commencing. The VCISD only require detailed excavation at the base of the previously excavated station shafts. There will be some limited ground disturbance creating the potential for erosion and sedimentation if appropriate controls are not implemented

	and maintained. The activities with the greatest potential to impact on the local environment and community from a stormwater, erosion and sedimentation perspective are considered to be: ● Detailed excavation and spoil generation; ● Stockpiling; ● The loading and haulage of materials off-site; ● Stormwater and groundwater detention and dewatering. The potential/uncontrolled impacts of these works may include: ● Cause of potential flow into stormwater system and/or adjacent surface water bodies from sediment laden water originating from the site. ● Stormwater with excessively high or low pH values could potentially run-off from work areas. ● Vehicles exiting construction site potentially depositing dust/dirt/mud on public roads after rain periods. The implementation of the control measures identified in the EHS Plan and Stormwater, Erosion and Sedimentation Management Procedure are intended to prevent or mitigate these impacts.
Legislation and Guidelines	**Federal/National:** The 'Blue Book' (Managing Urban Stormwater Soils and Construction) – Landcom, Fourth Edition (2004) 'White Books' - IECA 2008. Best Practice Erosion and Sediment Control. Books 1-6.International Erosion Control Association (Australasia) Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 Australian Guidelines for Water Quality Monitoring and Reporting 2000 **State:** • Protection of the Environment Operations Act 1997 • SSI 15_7400 conditions E107 to E109 • REMMs SCW3 and SCW4 **Lendlease Requirements:** • GMR: 4.13 Degradation or Pollution of the Environment • Lendlease Building Workplace Delivery Code (WDC)

Summary of Site Controls	Works must be planned and implemented in accordance with the Lendlease GMRs, the Project EHS Plan, this Procedure and the Lendlease Building WDC. These documents detail Lendlease's approach and commitment to pro-active and responsible site management. Site specific controls, monitoring, reporting and performance measurements have been identified in this Procedure to prevent or minimise the impacts of construction on the environment and community. These include but are not limited to: ● Preventing erosion through minimising ground disturbance; ● The installation of erosion and sedimentation controls; ● Covering/stabalising of stockpiles as required; ● The control and maintenance of site access and egress points to prevent tracking and off-site pollution; ● The identification of acceptable detention, testing, treatment and dewatering processes. ● Groundwater interception will be managed in accordance with the Construction Groundwater Management Plan. ● Erosion and sediment control measures would be implemented in accordance with Managing Urban Stormwater: Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater: Soils and Construction Volume 2 (Department of Environment and Climate Change, 2008a). Measures would generally be designed as a minimum for the 80th percentile; 5-day rainfall event. ● All water to be discharged in accordance with legislation and only after Lendlease approval. Discharge quality must comply with the NSW Water Qualiyt Objectives. Discharges from the construction water treatment plant would be monitored to ensure compliance with the discharge criteria. Site inspections, monitoring and reporting will be undertaken by Lendlease and subcontractors as detailed in the EHS Plan and the following implementation table.

2. IMPLEMENTATION OF THE PROCEDURE

Control Measure	Timing	Methodology	Responsibilty	Monitoring and Reporting	Performance Measurement
Planning and Site Establishment					
Limit ground disturbance to the area required for immediate construction.	Areas of clearing identified prior to works commencing	Detail excavation requirements on staging/sequencing program. WMS prepared by subcontractor.	SM/Foreman /EHS	Weekly/monthly inspection checklist. Inspection after a rain event.	No unnecessary land disturbance.
Install stormwater, erosion and sediment controls as required.	Prior to works commencing	Undertake a site inspection to verify the correct location of controls.	SM	Daily surveillance to assess effectiveness and condition. Weekly/monthly inspection checklist.	Controls modified or new controls installed as required.
Establish stable site exit points, parking areas, internal roads and turning areas to prevent the tracking of material off-site onto public roads.	Prior to works commencing. Maintain at all times	Retain existing hard surfaces where possible. Construct stable site entry/exit points and roadways using appropriate materials.	SM Foreman	Daily surveillance and maintenance. Weekly/monthly inspection checklist. Inspection of imported materials.	No tracking onto public roads or dust.
Install a vehicle/wheel washbay or shaker facility at the site exit.	Prior to construction commencing	Maintain shaker grid/wheel wash. Engage sweeper. Limited hosing of hard surfaces only.	SM/Foreman	Daily surveillance. Weekly/monthly inspection checklist.	No mud/silt tracked onto roadways.

Provide detention areas/tanks to capture/store site runoff.	Prior to commencing works	Operate and maintain in accordance with design/ engineering documentation.	CM/SM	Daily surveillance to assess condition and capacity. Weekly/monthly inspection checklist. Inspection during and immediately after rain.	Appropriately designed and maintained detention areas/facilities.
Erosion and Sediment Control During Construction					
Maintain erosion and sediment controls in an operable condition.	At all times and after rain events	Check the condition of controls. Remove accumulated sediment and debris and dispose. Undertake maintenance as required. Install new controls as new work areas open.	SM/Foreman	Daily surveillance. Weekly/monthly inspection checklist. Post rain inspections.	Appropriately maintained controls.
Maintain stormwater pipes, pits and other controls (eg plugs).	At all times	Check the condition and operation of stormwater infrastructure and controls. Remove any construction debris/sediment and dispose. Monitor for blockages.	SM/Foreman	Daily surveillance. Weekly/monthly inspection checklist.	Free flowing pipes capable of discharging maximum flows.
Cover all loads leaving site to minimise the potential for spillage and tracking.	At all times	Subcontractor to cover loads and prevent tracking. Loads and the condition of trucks/tailgates checked before leaving site.	SM/Foreman	Daily surveillance. Weekly/monthly inspection checklist	No uncovered loads No non conformances identified.

Maintain erosion and sediment controls until the potential for erosion and sedimentation has been eliminated.	At all times	Maintain controls. Do not remove controls prior to any area being deemed stable.	SM/Foreman /EHS	Weekly/monthly inspection checklist Inspections during rain events.	Controls effective and in good condition. No uncontrolled discharges of sediment off-site or into waterways.
Stormwater Detention and Dewatering					
Inspect detention facilities and stormwater treatment devices and remove any build up of debris.	Ongoing. As required by operating manual	Retain capacity in detention facilities for storm events.	SM	Weekly/monthly inspection checklist.	Detention areas and capacity of facilities maintained in operational condition. No uncontrolled discharges under design conditions.
Test, treat and reuse collected stormwater on-site for dust suppression, truck and plant washing (in designated areas only) – where approved.	Ongoing	Undertake water quality testing and treatment of stormwater. Meet required water quality criteria prior to reuse.	CM	Water quality test results from a NATA accredited laboratory.	Water treatment and dewatering undertaken in accordance with documented site procedure and Workplace Delivery Code.
Test, treat and discharge collected stormwater off-site if it cannot be reused on site.	Ongoing	Confirm that water quality testing, treatment and dewatering methods satisfy the requirements of the relevant statutory authority. Undertake water quality testing and treatment (as required) of stormwater. Meet specified water quality criteria prior to discharge. To discharge to offsite / stormwater system, water	SM Sub-contractor	Water quality test results from a NATA accredited laboratory and on site water treatment plant.	Water treatment and dewatering undertaken in accordance with documented site procedure and Workplace Delivery Code. No discharge of non-compliant water or off-site pollution.

		quality must meet the relvant project criteria, based on NSW Water Quality Objectives.			
Site Stabilisation					
Implement site stabilisation works and landscaping progressively to rehabilitate disturbed ground.	Progressively during construction	Stabilise and seal disturbed areas in accordance with the design/engineering/landscape plans and scope of works.	CM/SM/EHS	Weekly/monthly inspection checklist Project planning and design meetings.	Stabilisation of all disturbed work areas. No uncontrolled runoff containing sediment or contaminants.

APPENDIX 1 – WATER DISCHARGE CRITERIA

NSW Water Quality Objectives

The NSW Water Quality Objectives (WQOs) are the agreed environmental values and long-term goals for NSW's surface waters. They set out:

- The community's values and uses for rivers, creeks, estuaries and lakes; and
- A range of water quality indicators to assess whether the current condition of waterways supports those values and uses.

WQOs have been agreed for marine waters. The objectives are consistent with the agreed national framework for assessing water quality set out in the ANZECC Guidelines. These guidelines provide an agreed framework to assess water quality in terms of whether the water is suitable for a range of environmental values. The WQOs provide environmental values for NSW waters and the ANZECC Guidelines provide the technical guidance to assess the water quality needed to protect those values.
Water quality will be continuously monitored during the water treatment plant process prior to discharge to confirm that the discharge criteria as detailed below are met.

Standard Discharge Criteria

Parameter	Measurement and Assessment			Discharge Criteria
	Percentile Concentration Limit	Sample Method & Frequency	Units	
pH	100	Continuous/probe/grab sample. Prior to discharge	pH	6.5-8.5
Turbidity	100	Continuous/probe/grab sample. Prior to discharge	NTU	At a value calibrated to achieve <50 mg/l TSS
Total Suspended Solids	100	Continuous/probe/grab sample. Prior to discharge	mg/L	<50mg/L
Oil and grease	100	Visual	None visual	None visual

As per condition E107, the VCISD project must be constructed so as to maintain the NSW WQO's where they are being achieved and contribute towards achievement of the NSW WQOs over time where they are not being achieved. The below trigger levels will be implemented on the project for groundwater discharges at risk of containing the listed analytes. These trigger levels are subject to change during construction based on any further water quality monitoring and water impact assessments that may be completed. WQOs have been agreed for marine waters. The objectives are consistent with the agreed national framework for assessing water quality set out in the ANZECC Guidelines. The Australian and New Zealand Guidelines for Fresh and Marine Water Quality provide a framework

for setting trigger criteria based on background monitoring data. Trigger values are generally set as the 80th percentile of the median background value. Trigger values may be updated to reflect ongoing groundwater and receiving water data collection.

Levels of copper and zinc in groundwater have been identified to be above the adopted guidelines. The dissolved iron concentration is elevated which is consistent with groundwater quality monitored elsewhere within the Hawkesbury Sandstone. Minor hydrocarbon contamination (0.016 µg/L) was detected for the volatile Total Recoverable Hydrocarbon (TRH) for the chain length (C6 – C10). As such, additional discharge criteria based on the WQOs are outlined below.

Additional NSW WQO discharge criteria

Analyte	Groundwater Range	80th percentile value from available data	ANZG (2018) guideline value (95% marine water)	Discharge Trigger Value
Copper (µg/L)	2-16	Insufficient data	1.3	1.3
Zinc (µg/L)	3-190	Insufficient data	15	15
Iron (µg/L)	12-4400	40	300	300

APPENDIX 22 AIR QUALITY MANAGEMENT PROCEDURE

LENDLEASE BUILDING PTY LTD | 97 000 098 162

VICTORIA CROSS INTEGRATED STATION DEVELOPMENT

AIR QUALITY MANAGEMENT PROCEDURE

3/06/2020 | Revision No: 1

Project Procedure Revision Status				
Date	Revision (in numbers)	Purpose and Summary of Amendments	Reviewed by	Approved by
03/06/2020	1	Initial Copy	Jason Ambler	

*Note that all printed paper/hard copies of this document remain uncontrolled. The controlled copy of this document is found either in the project collaboration tool, within the Project Management Plan section, or other project specific database/server approved by the Regional EHS Manager / Head of EHS Integrated Project.

1. SCOPE OF PROJECT AND PROCEDURE

Project Details	
Scope of the Procedure	This Air Quality Management Procedure provides strategies and mitigation measures to minimise and control the generation of dust, odour and emissions to the environment during site establishment, demolition activities and construction of the project. Refer to Section 1.1 and 3.1 of the Project EHS Management Plan for clarification on how the EHS Sub Plans and Procedures form part of the Lend lease Building (LLB) EHS management system.
Objectives of the Procedure	• To prevent emissions to the environment (air). • To maintain current levels of local air quality during construction activities. • To provide an adequate monitoring regime to allow assessment of various dust generating construction activities on the site. • To prevent nuisance and ecological impacts (associated with air emissions) on the local community and environment. • To achieve compliance with the project approval criteria.
Scope of Works	This Procedure has been prepared based on the following scope of works: • Site establishment including vegetation trimming/removal, office and compound setup; • Detailed excavation and associated activities; • Construction of the Victoria Cross Metro Station (VCISD), and associated South Tower (OSD).

Key Issues and Risks	The works described above have the potential to generate dust and emissions primarily associated with excavation and construction; ● Ground disturbance, detailed excavation; ● Traffic movements and plant operation; ● Rock hammering; ● Spoil handling and stockpiling; ● Storage and handling of waste materials. Compliance with the Project EHS Plan and this Air Quality Management Procedure is intended to mitigate the risks and potential impacts of these activities on air quality. If appropriate controls are not implemented and maintained on the site, the potential exists for construction related air emissions to: ● Cause a nuisance or health effects to the local community; ● Result in complaints; ● Impact on the natural environment; or ● Create unsafe working conditions. The closest receptors to the site are located adjacent, including; ● Commercial buildings along Miller Street, Berry Street, Denison Street. ● Residential apartment blocks and houses on Miller St, Berry St and McLaren Street. ● North Sydney Council Chambers on Miller Street ● Monte Sant' Angelo College and Wenona School. The set out of the site compound including the location of the site access, internal roads, waste collection, storage and stockpile areas, and the planning of new works will consider the proximity of these receptors and the potential impacts of construction activities on their operation and property.
Legislation, Project Approval and Guidelines	**Federal/National:** • National Environment Protection (Ambient Air Quality) Measure (NEPM) 1998 **State:** • SSI 15_7400 conditions A18(b), A20, E5 • REMMs AQ1-AQ9 • Protection of the Environment Operations Act 1997

	• Protection of the Environment Operations (Clean Air) Reg 2002 **Lendlease requirements:** • GMR 4.13: Degradation or Pollution of the Environment • GMR 4.15: Uncontrolled Release of Stored Energy (non-electrical)) • Lendlease Building Workplace Delivery Code (WDC)
Summary of Site Controls	Works must be undertaken in accordance with the Lendlease GMRs, the Project EHS Plan, this Procedure and the Lendlease Building WDC. These documents detail Lendlease's approach and commitment to pro-active and responsible site management. Site specific controls, monitoring, reporting and performance measures have been identified in this Procedure to prevent or minimise the impacts of construction related air emissions on the environment and community. These may include but are not limited to: • Installing site perimeter dust protection measures; • Preventing dust generation through minimising ground disturbance where appropriate and the stabilisation of disturbed areas; • Controlling dust close to its source by installing sprays and sprinkler systems to prevent off-site migration; • Maintaining the site access to prevent dust generation and tracking off-site; • No blasting will be performed as part of the proposed construction works program; • Construction site layout and placement of plant would consider air quality impacts to nearby receivers; pedestrian, commercial receivers, public and road traffic • Spraying exposed work areas to suppress dust using water cannons, misters or other suitable equipment. • Minimise traffic on exposed areas – designated haul routes will be installed to ensure ground surfaces are well stabilised to minimise dust and tracking of material. • Cover haul vehicles loads & ensure tail gates are closed when operating on public roads. • Remove dirt from haul vehicles prior to entering public roads. • Remove any spilt material by construction equipment or vehicles on public roads immediately. Street sweepers to be engaged as required to ensure roads are clean. • Reprogram dust generating work during periods of high wind or when fugitive dust emissions cannot be controlled. • Regular visual monitoring of dust generation will be undertaken by the site supervisors. • Water suppression will be used for active earthwork areas, stockpiles, unsurfaced haul roads and loads of soil/quarried material being transported to reduce wind-blown dust emissions. • Any stockpiles will be suitably stabilised or covered (geofabric or similar) to ensure fugitive dust emissions are not created.

	● The engines of all on-site vehicles and plant would be switched off when not in use for an extended period. ● Plant would be well maintained and serviced to minimise emissions. Emissions from plant would be considered as part of pre-acceptance checks. Detailed excavation and construction stage dust and emission management requirements must be included in relevant specifications, contract agreements, quality assurance documents, and subcontractor work method statements. Site inspections, monitoring and reporting will be undertaken by Lendlease and subcontractors as detailed in the Project EHS Plan and the following implementation table.

2. IMPLEMENTATION OF THE PROCEDURE

Control Measure	Timing	Methodology	Responsibilty	Monitoring and Reporting	Performance Measurement
Planning and Site Establishment					
Include information in the Site Induction about the risks and potential impacts of dust and emissions on the environment and community.	Before works commence and ongoing	Revise Lendlease induction package to include site specific information.	CM/SM	Subcontractor WMSs address dust, odour and emissions control	Site induction delivered to all workers on site.
Design, document and implement an agreed air quality monitoring program.	Prior to works commencing	Confirm requirement for background and/or construction stage monitoring (as per project approval or contract). Engage consultant	CM	Results of air quality monitoring program.	Required monitoring performed correctly and accurate data available. Required monitoring undertaken by a suitably accredited consultant.
Limit ground disturbance to the area/s required for immediate construction.	Prior to works commencing	Identify and fence off areas to be left undisturbed. Detail excavation requirements on staging program. Incorporate relevant requirements into WMS prepared by relevant subcontractors.	SM/ Foreman	Daily surveillance. Weekly/monthly inspection checklist. Review of program.	Staged clearing/disturbance effectively implemented. Acceptable dust levels.
Install solid hoardings at the site perimeter.	Site establishment and ongoing	Identify and install hoardings/ shadecloth giving consideration to the location of neighbours, key work zones and prevailing winds.	SM/ Foreman	Daily surveillance. Weekly/monthly inspection checklist.	No reported dust monitoring exceedances. Number of complaints.
Seal or construct the site access, roads, turning and parking areas using gravel or non-dust generating materials.	Prior to construction commencing	Retain hardstand areas where existing.	SM	Pre-construction inspection.	No fugitive dust generation associated with vehicle movements.

		Construct new stable areas using road base or sandstone as a minimum. Install wheel wash and/or shaker facility		Weekly/monthly inspection checklist.	No unacceptable tracking of materials onto public roads.
Dust Control During Construction					
Limit speed to 20km/hr on internal roads and access ways to reduce dust and vehicle emissions.	During construction	Stabilise haul roads outside the bulk excavation area. Install speed limit signage.	SM	Daily surveillance to monitor vehicle speed.	Minimal dust generated by traffic on construction roads/access. No speeding vehicles.
Maintain the site access and traffic routes in a clean, dust free condition.	Ongoing	Maintain shaker grid/wheel wash. Engage sweeper. Limited hosing of hard surfaces only. Clean up spilled soil immediately.	SM	Daily inspection of site access and local roads. Weekly/monthly inspection checklist. Inspections immediately after rainfall events.	No complaints from public or authorities. No dust generated on public roads.
Avoid excavation and handling during periods of high wind.	As required	Only enter areas that need to be worked. Work in areas away from sensitive receptors. Maintain site access controls and clean roadways. If dust uncontrolled, stop work until conditions are more favourable if dust and/or tracking cannot be controlled.	SM	Constant surveillance during unfavourable conditions. Monitor meteorological reports.	Stop works during high wind or where dust cannot be controlled. Number of complaints.
Reduce requirements for the handling and stockpiling of excavated materials.	At all times	Pre-test and validate soils to enable direct transport off-site, where practical (rather than stockpiling).	SM/ Foreman	Include requirements in tenders for subcontractors. Daily surveillance of activities.	Controls maintained and effective.

		Dampen down materials during handling.			
Locate and maintain stockpiles to minimise wind erosion and dust.	At all times	Locate stockpiles away from sensitive receptors. Keep stockpiles to a manageable size and cover. Keep exposed surfaces moist and compacted to reduce erosion potential. Stabilise or cover stockpiles left for >4 weeks.	SM	Daily surveillance. Weekly/monthly inspection checklist.	No fugitive dust from stockpiles. Number of reported dust complaints or exceedances.
Dampen down exposed areas and activities with the potential to create dust (eg excavation faces, handling areas, stockpiles etc)	At all times	Identify the risk of dust/nuisance impacts (IHRA) associated with key activities/areas. Establish appropriate watering/ fogging/misting/spray systems to control dust at the source.	CM/SM	Daily surveillance. Weekly/monthly inspection checklist. Monitoring results.	Limited dust generation. Number of complaints.
Cover trucks transporting loose material to prevent dust generation and spills.	At all times	Include in subcontractor WMS. Cover all loads. Clean up spills immediately.	SM/ Foreman	Vehicle inspection prior to entering and leaving the site.	No visible loose material. Number of complaints.
Undertake progressive stabilisation and landscaping of disturbed areas, where practical.	Ongoing	Incorporate rehabilitation activities into the construction program where practical. Apply temporary and/or permanent vegetation and mulch to stabilise as required.	CM/SM	Weekly/monthly inspection checklist. Project planning and design meetings.	Disturbed areas stabilised. No areas left exposed for prolonged periods.
Air Quality Controls (Contamination/Hazardous materials)					
Prevent potentially contaminated dust being generated during the	At all times	Engage a specialist environmental consultant (as required).	SM	Dust monitoring results. Soil test results.	Dust controlled.

disturbance and handling of contaminated soil.		Implement recommended controls, eg; spray systems.			Acceptable air quality monitoring results.
Implement controls for the removal and handling of hazardous building materials (eg asbestos or lead-based paints)	At all times.	Engage a specialist hygienist/environmental consultant (as required). Install appropriate dust controls and monitoring equipment.	CM/SM	Air quality monitoring during and after works. Clearance by occupational hygienist.	Building and area cleared of hazardous materials. Acceptable air quality monitoring results.
Combustion Emission Controls (TSP, PM10, NOx, CO and BTEX)					
Burning of waste on site is banned.	At all times	Address in site induction.	SM	Daily surveillance.	No fires or incineration on site.
Fit plant and equipment with emission control devices and maintain.	At all times	Include requirements in subcontractor documents. Documented plant condition inspections by subcontractors. Verify that plant/equipment has been regularly maintained to minimise visible smoke and emissions.	SM	Routine and random inspections of plant. Emissions not visible for >10secs (as a general rule).	Copies of service records and/ or inspection to be supplied. No complaints from site personnel or neighbours.
Turn equipment and plant engines off when not in use for extended periods.	At all times	Address in contractors WMS.	SM	Daily surveillance.	No excessive (visible) emissions or odour.

APPENDIX 23 CONSERVATION AND HABITAT MANAGEMENT PROCEDURE

VICTORIA CROSS INTEGRATED STATION DEVELOPMENT

CONSERVATION AND HABITAT MANAGEMENT PROCEDURE

3/06/2020 | Revision No: 1

Project Procedure Revision Status				
Date	Revision (in numbers)	Purpose and Summary of Amendments	Reviewed by	Approved by
03/06/2020	1	Initial Revision	J Ambler	

*Note that all printed paper/hard copies of this document remain uncontrolled. The controlled copy of this document is found either in the project collaboration tool, within the Project Management Plan section, or other project specific database/server approved by the Regional EHS Manager / Head of EHS Integrated Project.

1. SCOPE OF PROJECT AND PROCEDURE

Project Details	
Scope of the Procedure	This Conservation and Habitat Management Procedure provides strategies and mitigation measures for the identification and protection of flora and fauna. It outlines appropriate measures to ensure that identified flora or fauna populations, are managed appropriately during the construction phase. This includes, street trees and any remnant vegetation encountered during site establishment and construction of the project. It describes measures to be implemented during relevant construction activities, which enables assessment of the impacts of construction activities on potentially affected areas. Refer to Section 1.1 and 3.1 of the Project EHS Management Plan for clarification on how the EHS Sub Plans and procedures form part of the Lendlease Building (LLB) EHS management system.
Objectives of the Procedure	• To prevent or minimise as far as practical, impacts on flora, fauna and habitat. • To retain and/or protect significant trees present on and immediately adjacent to the site. • To protect habitat and native fauna identified within and immediately adjacent to the site. • To reduce impacts on natural habitats from introduced fauna (i.e. vermin) and noxious flora (i.e. weeds) during the course of the site works
Scope of Works	This Procedure has been prepared based on the following scope of works: • Site establishment including vegetation trimming/removal, office and compound setup; • Detailed excavation and associated activities; • Construction of the Victoria Cross Metro Station (VCISD), and associated South Tower (OSD).
Key Issues and Risks	The works described above have the potential to impact directly and indirectly on the flora and fauna existing within and adjacent to the site. Construction activities have the potential to directly and indirectly, adversely impact on flora, fauna, habitat and natural ecosystems as a result of: • Tree removal to allow for construction; • Root compaction or damage to the trunk or limbs of trees. On this project, impacts are expected to be limited to: • Removal of approximately 8 trees, with replacement planting of 12 large trees and 10 small trees. 3 exisitng trees are proposed to be retained and provided with new tree pits. Trees will be replaced with implimentation of the final landscaping design and scope.

Project Details	
	The following aspects (activities) have been identified as the key risk sources on this Project: ● Unnecessary or over clearing of vegetation (ie design issue, clearing area not clearly marked out, unauthorised access to vegetated areas); ● Compaction of root zones due to vehicles or the inappropriate storage of materials in protection zones; ● Inappropriate waste disposal encouraging feral animals and pests to frequent the construction site; ● Accidental spills of hazardous chemicals and/or hydrocarbons. ● Unauthorised works / removal of vegetation outside defined work area. The implementation of the control measures identified in the EHS Plan and this Procedure are intended to mitigate these risks and any potential impacts on the environment and species.
Legislation, Approval and Guidelines	**Federal/National:** • AS4970 – 2009 Protection of Trees on Development Sites **State:** • SSI 15_7400 conditions E6, E101e • REMM B3 Code of Practice for Injured, Sick and Orphaned Protected Fauna (NSW OEH 2011) **Lend lease Requirements:** • 4.13 Degradation or Pollution of the Environment • 4.15 Uncontrolled Release of Stored Energy (non-electrical)) • Lend lease Building Workplace Delivery Code (WDC)

Summary of Site Controls	• Works must be planned, implemented and monitored in accordance with the Lend lease GMRs, the Project EHS Plan and Lend lease Building WDC. These documents detail Lendlease's approach and commitment to pro-active and responsible site management.
	• Site specific controls, monitoring, reporting and performance measures have been identified in this Procedure to prevent or minimise the impacts of construction on natural areas and features. A flora, fauna and/or vegetation assessment, tree plan or arborist report must be obtained/reviewed to identify:
	  ○ The location and type of significant trees and vegetation located within and adjacent to the site;
	  ○ Trees and vegetation directly impacted by construction (approved for removal) and those requiring protection;

Project Details	
	○ Suitable protection and mitigation measures (eg connectivity structures, planting, regeneration); and ● Any tree removal/impact will be managed in accordance with the Tree Report required under CSSI CoA E6 ● There is limited fauna habitat as the site consists of entirely disturbed lands consisting bedrock, hardstand and concrete slabs from basements of previously demolished buildings. ● The local WIRES group and / or veterinarian would be contacted if any fauna are injured on site or require capture and / or relocation. ● No clearing or vegetation removal to occur without appropriate approval. ● Works will only be undertaken in designated areas. ● Plant and equipment brought on to site must be clean and free of deleterious material, mud and other material that may harbour weed seeds. ● Site inspections, monitoring and reporting will be undertaken by Lend lease and subcontractors as detailed in the EHS Plan and following implementation table.
Unexpected Find Protocol (fauna)	1. Cease work, turn off machines and clear the area immediately if a potentially unidentified fauna species has been discovered. 2. Contact the EHS Coordinator, Site Manager or Construction Manager immediately. 3. The local WIRES group and / or veterinarian would be contacted if any fauna are injured on site or require capture and / or relocation. 4. The LLB EHS Manager, senior site personnel and/or relevant authorities will determine if further management actions are necessary based on an available information.

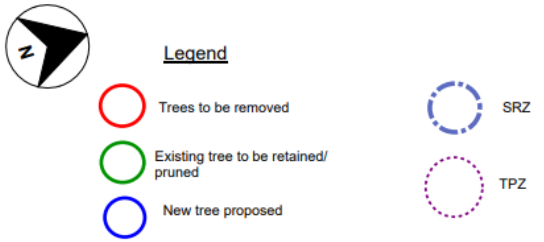
2. IMPLEMENTATION OF THE PROCEDURE

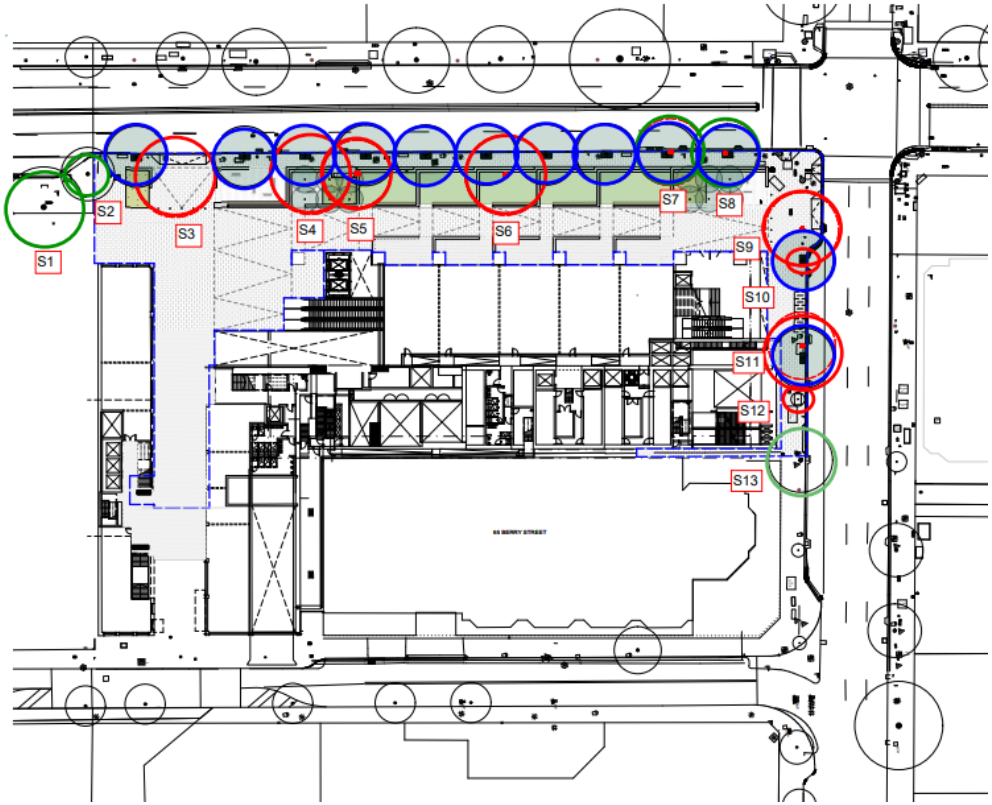
Control Measure	Timing	Methodology	Responsibility	Monitoring and Reporting	Performance Measurement
Planning and Site Establishment					
Review the environmental/flora and fauna assessment from the project EIS and arborist reports for the site and adjacent areas (including footpath landscape trees).	Prior to commencing work / Ongoing	Arborist to prepare. Assessment/report reviewed and recommendations communicated to team and subcontractors.	CM/ Consultant	Protected trees/vegetation/ habitat identified.	Register of species included in arborist report. Tree/vegetation/habitat protection diagram prepared.
Prepare a Tree, Vegetation and Habitat Environmental Management Diagram (EMD) for the site and surrounds.	At site establishment and prior to works commencing	Prepare EMD (Appendix 1). Prepare diagram showing the location of vegetation approved for removal, protected trees, clearing limits.	CM/SM	Tree, Vegetation and Habitat EMD prepared.	No unauthorised tree removal.
Clearly identify trees and vegetation to be retained.	Prior to commencing work	Clearly identify protected trees/vegetation and those that have been approved for removal.	SM/ Contractor	Confirm protection measures are correctly installed and boundaries/ footprint correctly identified.	Clearing minimised.
Retain existing landscape and floral features (as far as practicable).	At all times	Consider existing landscape features at design and site setup stages and retain where possible/desirable. Maintain works within the building footprint.	CM	Check extent of disturbance and compliance with clearing limits.	No unnecessary clearing. Disturbance restricted to work area.
Install tree, vegetation protection measures.	Prior to works commencing	Establish tree protection around retained vegetation, where at risk of damage. Ecologist/Arborist to advise measures.	SM/ Consultant/ Contractor	Weekly/monthly inspection checklist.	Compliance with requirements.

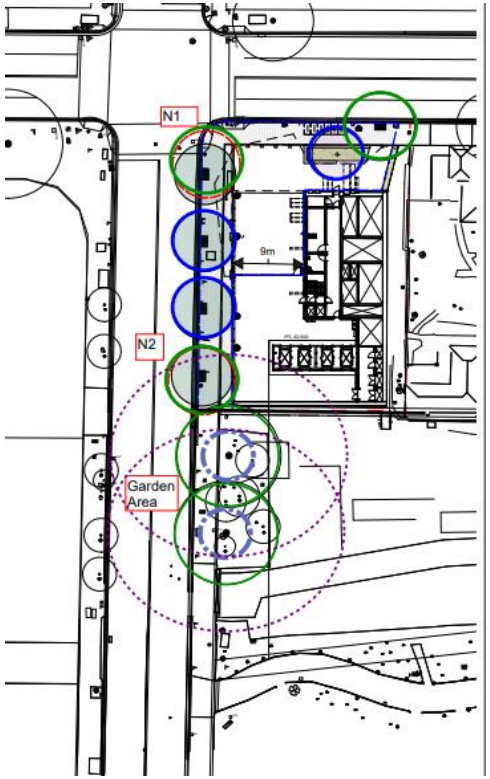
Identify and remove noxious weeds and provide on-going control.	Prior to works commencing and ongoing	Mark out weed infested areas. Undertake weed control in accordance with local government requirements. Avoid re-using weed infected topsoil.	SM	Monitor re-occurrence	No weeds present after construction is completed.
Protecting Flora During Construction (Trees and Vegetation)					
Undertake clearing and lopping strictly in accordance with agreed plans/protocols.	During clearing activities	Develop a clearing WMS/protocol incorporating the requirements of the environmental assessment, project approval and specialist plans. Consult with the ecologist/arborist and undertake an inspection of the area being cleared. Arborist to perform works where required. Communicate with relevant subcontractors. Limit disturbance to the minimum necessary using clear delineation of clearing limits/excavation footprint.	SM/ Consultant/Arborist Contractor	Supervise and monitor clearing activities to assess compliance with agreed protocols.	Correct type and extent of vegetation removed. No unauthorised tree removal or disturbance. No protected flora damaged or fauna injured.
Prohibit construction vehicle parking and the storage of building materials, spoil and waste within tree protection zones.	At all times.	Tree protection fencing and NO ENTRY signs installed in appropriate locations to prohibit access. Address in Site Induction.	CM	Weekly inspection checklist.	No damage to retained vegetation or trees. All materials and waste stored correctly in designated areas of the site.
Implement landscape works in accordance with approved landscape design/management plans.	Project completion	Landscape designs reviewed by the Sydney Metro Design Review Panel.	CM/ SM	Monitor and maintain new works to ensure survival. Weeds identified and removed.	No planting other than approved species.
Protecting Fauna During Construction (Animals)					

Minimise the potential for vermin or introduced (feral) species entering the site.	At all times	Provide an adequate number of waste receptacles with secure lids. Communicate site requirements to dispose of food waste appropriately.	SM/ Contractor	Weekly inspection checklist	No vermin or feral animals identified on site.
Implement the Unexpected Find Protocol (UFP) in the event that a significant species of wildlife is identified or suspected on the site.	At all time	Initiate a response in accordance with the UFP. Document the find as an event in Enablon.	SM/ Contractor	Monitor construction works for the presence of wildlife.	No injured fauna.
Undertake revegetation works strictly in accordance with the landscape design/management plan.	At design phase	Discuss revegetation requirements with the landscape designer. Undertake revegetation works progressively. Ensure all disturbed areas are stabilised.	SM/ Contractor	Weekly inspection checklist	High landscape planting survival rate. Disturbed areas stable.

APPENDIX 1 TREE REMOVAL AND PROTECTION SUMMARY







APPENDIX 24 CONTAMINATION MANAGEMENT PROCEDURE

LENDLEASE BUILDING PTY LTD | 97 000 098 162

VICTORIA CROSS INTEGRATED STATION DEVELOPMENT

CONTAMINATION MANAGEMENT PROCEDURE

3/06/2020 | Revision No: 1

Project Procedure Revision Status				
Date	Revision (in numbers)	Purpose and Summary of Amendments	Reviewed by	Approved by
03/06/2020	1	Initial Revision	J Ambler	

*Note that all printed paper/hard copies of this document remain uncontrolled. The controlled copy of this document is found either in the project collaboration tool, within the Project Management Plan section, or other project specific database/server approved by the Regional EHS Manager / Head of EHS Integrated Project.

1. SCOPE OF PROJECT AND PROCEDURE

Project Details	
Scope of the Procedure	This Contamination Management Procedure provides details of the controls that will be implemented to identify and handle contaminated soil and water where it is found unexpectedly during site establishment and/or construction. It also identifies mitigation measures for specific construction activities, monitoring requirements and contingency measures where exceedances of specified critieria is identified. Refer to Section 1.1 and 3.1 of the Project EHS Management Plan for clarification on how the EHS Sub Plans and Procedures form part of the Lendlease Building (LLB) EHS management system.
Objectives of the Procedure	• To ensure that contaminated soil and groundwater is identified and managed in accordance with regulatory requirements and guidelines. • To establish a process for the removal of contaminated soil/water that may be encountered during demolition or construction. • To identify opportunities for the re-use of contaminated soil and/or groundwater on and/or off-site (in accordance with relevant legislation/guidelines). • To minimise the environmental and health risks associated with the handling of contaminated materials and future use of an area.
Scope of Works	This Procedure has been prepared based on the following scope of works: • Site establishment including vegetation trimming/removal, office and compound setup; • Detailed excavation and associated activities; • Construction of the Victoria Cross Metro Station (VCISD), and associated South Tower (OSD).
Key Issues and Risks	The potential for soil and/or groundwater contamination at the site is considered low. A Stage 1 preliminary site investigation was completed for Victoria Cross during the EIS development for the Sydney Metro Chatswood to Sydenham project (Technical Paper 8), which indicated no known or unacceptable risk of contamination on the Victoria Cross site and that no updated contamination assessment was recommended for the site. Further to the EIS, Sydney Metro's tunnelling and excavation contractor has completed bulk excavation of the two station shafts prior to VCISD works commencing. No unacceptable contamination identified. As no unacceptable contamination is anticipated, a stage 2 investigation is not considered appropriate and works to progress under an 'unexpected finds' protocol. Notwithstanding the above, the following activiites are key risk sources associated with the handling of contaminated materials during construction:

	• Unexpected finds of contamination causing exposure of workers or the community to vapours or chemicals in soil and groundwater during detailed and bulk excavation; • Incorrect storage of contaminated soil or groundwater resulting in the on- or off-site migration of contaminants into local ecocystems; • Inappropriate re-use or disposal of contaminated materials without approval or required documentation.
Legislation and Guidelines	**Federal/National:** National Environmental Protection (Assessment of Site Contamination) Measure NEPM (1999) Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites (1992) (NOTE: Recinded) AS4482.1:2005 Guide to the Sampling and Investigation of Sites with Potentially Contaminated Soil – Non-volatile and Semi-volatile compounds. https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as4000/4400/4482.1-2005.pdf Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 **State:** SSI 15_7400 conditions E66 to E70. REMMs HR2 and HR3 Protection of the Environment Operations Act 1997 State Government guidelines and contaminated site registers including: http://www.epa.sa.gov.au/environmental_info/site_contamination http://epa.nsw.gov.au/clm/ State Environmental Planning Policy No. 55 - Remediation of Land Technical Note: Investigation of Service Station Sites (NSW EPA April 2014) Best Practice Note: Landfarming (NSW EPA April 2014) Guidelines for NSW Site Auditor Scheme **Lendlease Requirements:** • GMR: 4.13 Degradation or Pollution of the Environment • Lendlease Building Workplace Delivery Code (WDC)
Summary of Site Controls	Works must be undertaken in accordance with the Lendlease GMRs, the Project EHS Plan, this Procedure and the Lendlease Building WDC. These documents detail Lendlease's approach and commitment to pro-active and responsible site management.

	Site specific controls, monitoring, reporting and performance measures have been identified in this Procedure to manage unexpected contamination encountered on the site. These include but are not limited to: ● Appointing a suitably qualified consultant to conduct contamination assessment and testing, as required; ● Obtaining a preliminary waste classification report for spoil proposed to be removed from site. ● Assessing remediation and reuse options; ● Making provision for the segregation of soils and temporary stockpiling; ● Classifying soil and waste prior to removal off site; ● Minimising the exposure of workers and the community to contamination; and ● Validating the site after the removal of contaminated material. Relevant requirements for contamination identification, management and disposal will be included in relevant specifications, contract agreements, subcontractor work method statements and quality assurance processes. Site inspections and surveillance will be undertaken by Lendlease and subcontractors as detailed in the EHS Plan and the following implementation table.
Unexpected Find Protocol	If suspected contaminated soil, water or other materials are discovered during site establishment or excavation in an area previously identified as being uncontaminated (clean), the following protocol must be followed: 1. Cease work and evacuate the area immediately (to the upwind side of the contamination); 2. Contact the EHS coordinator, Site Manager or Construction Manager immediately to report the issue; 3. Erect barricades to isolate the area. Where possible a minimum distance of 10m should be established between the suspect material and the barrier. 4. Notify the appropriate regulatory authority as soon as possible (where applicable). 5. Engage a suitably qualified environmental specialist. 6. Prevent access to the barricaded area. A Clearance Certificate or written approval from the environmental specialist must be obtained prior to re-gaining entry to the area. 7. Arrange sampling of the suspect material by the environmental specialist (as advised by the LLB Construction Manager). 8. In consultation with the environmental specialist, LLB senior site personnel and/or relevant authorities, determine if further remedial action is necessary based on the sample results to enable reuse, treatment or disposal. 9. Obtain permits to carry out remedial works and implement appropriate environmental and health controls. Obtain a written clearance certificate from the environmental specialist before re-entering the area. Remove the barricade at the completion of the remedial works and resume activities under the direction of the LLB Construction Manager.

2. IMPLEMENTATION OF THE PROCEDURE

Control Measure	Timing	Methodology	Responsibilty	Monitoring and Reporting	Performance Measurement
Planning and Site Establishment					
Undertake a Preliminary Contamination Assessment (PCA) for the site OR obtain a copy of existing (relevant) contamination reports and determine the current site conditions.	Prior to works commencing	Review existing data available. Where required, appoint a suitably qualified consultant to assess the work area, to determine the extent and nature of contamination and the risk of harm to human and environmental health. Assess potential risks, address unexpected finds in the construction program and identify acceptable work methods. Include relevant requirements into subcontractor WMSs and contract documentation.	CM SM EM	WMSs prepared.	Need for remedial works identified as required. No inappropriate disposal of contaminated materials. No adverse impact on the health of workers or the community.
Undertake preliminary waste classification testing to facilitate the identification of contamination, remediation options and determine the waste classification of the spoil (as required).	Prior to works commencing	Arrange for the testing and classification of spoil and groundwater (if risk is identified). Assess options for remediation, reuse and recycling of spoil. Identify waste types, volumes and landfill facilities approved for disposal.	CM SM	Waste classification details available. Options identified and feasibility assessment provided to Client. Suitable treatment and/or recovery/disposal sites identified.	Waste recovered/disposed of in accordance with the waste classification report.
Implement the Unexpected Find Protocol if contaminated material is exposed or suspected during works.	As required during early works	Implement protocol immediately.	CM SM	As per the protocol (above). Report to RBU EHS Manager.	Protocol followed. Minimal disturbance to suspected contaminated material.

					No impact on the environment or workers due to exposure.
Handling of Contaminated Materials					
If identified, establish stockpile areas in appropriate locations within the site.	Prior to works commencing	Make provision for the on-site temporary storage of soil pending waste classification or advice from the Client. Contractor to prepare area based on specification (must be sealed, bunded and drained appropriately). Segregate soils pending re-use, remediation and/or off-site disposal.	SM	Daily surveillance to assess stockpile conditions. Weekly/Monthly inspection checklist.	No uncontrolled or off-site pollution associated with material storage. Capacity appropriate for volumes expected.
Obtain relevant approvals and permits for remediation and transport, reuse and/or disposal of contaminated soil and/or water.	Prior to any material leaving site	Identify suitable waste transport contractors. Obtain details of civil works contractor licences and approvals to transport contaminated or hazardous materials. Check landfill/disposal facility licence details to confirm their suitability to accept the material.	SM	Copies of licences and approvals reviewed.	No waste leaving site without approval. Copies of permits/approvals kept on site.
Undertake environmental monitoring as required (ie VOC, asbestos, dust) to assess ambient conditions.	Establish prior to works commencing and maintain during works	Engage a suitably qualified consultant to identify the extent, frequency and duration of monitoring requirements.	CM Specialist consultant	Daily surveillance and analysis of results.	Results available and acceptable.
Segregate contaminated soil/water from other wastes to prevent cross contamination.	At all times	Based on advice from the consultant, segregate soils and provide identification signage. Ensure spoil and water storage areas are secure and environmental controls (bunds and dewatering	SM Specialist consultant	Daily inspection of stockpiles and water storage facilities. Weekly/monthly inspection checklist.	Waste correctly classified. Cross contamination avoided. Signage present.

		collection points) have been established to prevent uncontrolled discharges.		Testing by NATA accredited laboratory.	Stockpiles stable and no uncontrolled discharge evident.
Store contaminated soils/groundwater safely and securely.	At all times	Contractor to prepare designated waste storage areas with appropriate environmental controls and monitoring.	SM Specialist consultant	Inspection prior to commencement of excavation and storage.	No uncontrolled runoff from stockpiles. No cross contamination of waste.
Minimise worker and community exposure to contaminated materials.	At all times	Provide appropriate PPE, instruction and training on contaminated material handling.	SM Specialist consultant	Daily surveillance of work areas. Weekly/monthly inspection checklist.	No elevated monitoring events. PPE evident. SWMS followed.
Remediation, Pre-treatment, Reuse, Disposal and Validation (including transport)					
Treat contaminated soil and groundwater on site for reuse or to achieve a lower waste classification.	Where feasible	Seek advice from the environmental consultant on treatment, remediation and reuse options. Obtain relevant approvals. Arrane for validation of treated materials to confirm fit for purpose/reuse.	CM Specialist consultant EHS Manager	Approvals received. Remediation test reports obtained. Validation of remediated soils and water.	No environmental incidents during treatment. No complaints regarding odour during treatment. No soil/water reused without consent. Reuse achieved.
Reuse treated soils/groundwater on site where acceptable results have been achieved.	Where remediation successful.	Specialist to confirm that materal is fit for purpose (based on testing and visual assessment).	SM Specialist consultant.	Remediation test reports confirming materials are fit for purpose. Client consent.	No soil or water reused without consent. Validation certificate for all reused wastes/
Review the safety and environmental risks involved in the transport of contaminated soil/water to off-site receiving facilities.	Prior to material being removed from site	Contractor to provide details on transport route. Assess route and risks.	SM	Inspect contractor liences, approvals, insurance and vehicle condition.	Copies of relevant documents retained in site files. No use of unauthorised traffic routes.

		Drivers to be advised and instructed in safe transport and agreed route. Licensed contractors only used.			No transport incidents or loss of materials onto public roads.
Dispose of contaminated soils and ground/water that cannot be reused or recycled to an appropriately licensed landfill or facility.	Where remediation and on-site reuse is not feasible	Confirm classification of the waste. Engage licenced solid and liquid waste contractors. Contractor to prepare and communicate requirements of a WMS addressing the handling, transport and disposal of contaminated materials. Contractor to obtain disposal approvals, permits and licence details and retain waste disposal documentation.	SM Contractor Specialist consultant.	Inspect permits, approvals and transport vehicles. Waste report. Copies of waste dockets to verify disposal to an approved facility. Capture waste data in Enablon.	No loss of material onto public roads. No illegal disposal of waste. Waste dockets correspond with expected waste volumes/types.
Validate excavations/materials.	At the completion of excavation	Engage a specialist to perform and validate remediation and reuse areas and materials.	CM Specialist consultant	Validation report.	Re-used remediated materials validated. Areas deemed fit for use.
Decontamination					
Establish worker decontamination areas, as required.	Prior to and during remediation and removal activities as required	Seek specialist advice from an OHS hygienist. Contractor to prepare a WMS and instruct workers. Establish suitable facilities for worker decontamination, the removal of coveralls and the cleaning of masks and boots. Respirators must remain on during the decontamination process. Dispose of used clothing and equipment as contaminated waste.	SM Contractor	Daily surveillance of decontamination operation. Personal monitoring or testing (as recommended by the specialist hygienist). Waste dockets/reports. Inspection by specialist.	Monitoring implemented and results available and assessed. No exceedance of monitoring criteria. Correct waste disposal.

Establish plant decontamination areas, as required.	Prior to and during remediation activities, as required.	Seek specialist advice from an OHS hygienist on the set-up of wash out/decontamination areas. Contractor to prepare a WMS and instruct workers. Identify designated parking areas within the contaminated zone for the washdown of excavators/trucks, plant and tools. Contractor to provide suitable PPE for activity. Provide environmental controls to capture wash-water and transfer to a truck outside the contaminated zone. Arrange for testing and classification of the waste prior to disposal.	SM	Daily surveillance. Weekly/monthly inspection checklist. Inspection by specialist. Waste dockets/reports. Waste captured in Enablon.	No uncontrolled discharge of wash water. No waste to leave site until classified.

APPENDIX 25 PLAN SIGNATURES

I acknowledge that I have read and understood this Project EHS Management Plan and my roles and responsibilities in implementing an incident and injury free workplace.

Name	Position	Signature	Date