



Construction Environmental Management Plan

Eurobodalla Southern Water Supply Storage: Partial Clearing of the Permanent Works and Inundation Area

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Glossary and Abbreviations

Abbreviation	Detail
CEMP	Construction Environmental Management Plan
CFFMP	Construction Flora and Fauna Management Plan
CSWMP	Construction Soil and Water Management Plan
DOI	Department of Industry
DPI	Department of Primary Industries
DPIE	Department of Planning, Industry and Environment
DPIE - EES	Department of Planning, Industry and Environment – Environment, Energy and Science
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
SSD	State Significant Development
TRIPS	Tuross River Intake Pump Station
WQO	NSW Water Quality Objectives
WTP	Water treatment plant

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1 Introduction

1.1 Approved Project

The Eurobodalla Southern Water Supply Storage (the Project) was granted Development Consent from the Department of Planning, Industry and Environment (DPIE) on 17 October 2019. The Development Consent is provided in **Appendix A**.

The Project consists of an off-stream water storage facility and associated ancillary facilities. Water would be extracted from the Tuross River, using a new river intake pump station, and transferred to the storage via the Storage Inlet Pipeline. As necessary, the storage volume would be supplemented by water extracted from an existing borefield adjacent the storage.

Water would be extracted from the Tuross River at volumes in accordance with the *Water Sharing Plan for the Tuross River Unregulated and Alluvial Water Sources 2016* (Tuross River WSP). The Tuross River WSP defines the total daily extraction limit (TDEL) of water from the Tuross River. The Tuross River WSP also provide limits for the maximum volume of water that can be extracted from the Tuross River under specific flow conditions.

Extracted water stored in the facility would be used to supplement the existing Eurobodalla Shire Council water supply network during periods of drought. The water storage facility would also supplement peak summer demand by providing a secure yield, while complying with the requirements of the Tuross River WSP.

Key features of the Project include:

- a 3,000 megalitre storage capacity
- a 370 metre long embankment, 39 metres in height and a crest width of 20 metres located on an unnamed tributary of the Tuross River
- a spillway
- permanent erosion control structures located downstream of the spillway
- inlet works to convey and dissipate raw water transferred from the river intake pump station through a pipeline constructed along the left abutment to the proposed water storage facility
- outlet works to allow transfer of water from the storage to the existing southern water treatment plant (WTP)
- instrumentation to monitor seepage, reservoir levels and water quality
- a consequence category of “High C” for both flood and sunny day scenarios in accordance with the Australian National Committee on Large Dams (ANCOLD) Guidelines on the consequence categories of dams (2012)
- a thermal stratification control system
- a boat ramp at the storage for maintenance and water quality monitoring
- safety and perimeter fencing at the storage.

Key features of the ancillary facilities include:

- new river intake pump station with a total river extraction capacity made up of a combination of flows from the river intake (up to 26 megalitres) and the borefield (up to six megalitres)
- installation of the following new pipelines including:
 - a pipeline with a capacity of 26 megalitres per day to transfer raw water from the new river intake pump station to the storage inlet chute
 - a cross connection to the proposed water storage inlet pipeline with a capacity of six megalitres per day providing connection to supply water from the storage to the balance tank at the existing WTP
 - a pipeline connection from the existing borefield pipeline to the river intake pump station.
- a new storage access road that is about one kilometre in length and extends from Eurobodalla Road opposite the existing WTP to the embankment crest
- basic right-turn and basic left-turn treatment at the intersection of the new storage access road and Eurobodalla Road would be provided
- a new access road that would provide a route for vehicles to access the new river intake pump station
- power supply including the construction of new sub-stations located near the storage and the river intake pump station.

1.2 Construction activities covered under this CEMP

This Construction Environmental Management Plan (CEMP) forms part of the Construction Environmental Management Plan (CEMP) and details the for partial clearing of the permanent works design area, ancillary works and inundation areas, herein referred to as the “Partial Clearing works”, for the Eurobodalla Southern Water Supply Storage Project (the Project). The extent of the Partial Clearing works area is herein referred to as the “clearing boundary” as shown in Figure 1-1.

Subject to approvals, the Partial Clearing works covered under this CEMP will be undertaken by the Forestry Corporation of NSW (herein referred to as Forestry) and an independent arborist contractor. The Partial Clearing works are proposed to be undertaken from February 2022 to end of June 2022, with clearing of habitat trees occurring in February 2022 and the first 2 weeks of March 2022 to minimise disturbance to breeding of threatened fauna. Clearing of other non-habitat trees can be undertaken outside of this February-early March 2022 period (i.e. mid-March to end of June 2022).

The Partial Clearing works to be undertaken by Forestry would comprise clearing of harvestable timber for sawmill and pulpwood, through selective clearing of trees greater than 15cm in diameter, as well as all hollow-bearing Trees (HBTs) within the clearing boundary (Figure 1-2). The Partial Clearing works to be undertaken by the independent arborist contractor would comprise clearing of HBTs for the purpose of repurposing hollows into nest boxes for Project use as part of the Construction Flora and Fauna Management Plan (CFFMP).

The Partial Clearing works within the clearing boundary will be comprised of the two following areas (depicted in Figure 1-3):

Clearing Area 1 - Localised grubbing of stumps, roots and organic material will be required around trees selected for clearing greater than 30cm in diameter. Grubbed stumps, roots and organic material will be spread over the disturbed area to provide soil and erosion stability. No grubbing will take place within gullies. This area largely comprises the permanent works design area.

Clearing Area 2 – Areas to be cleared for harvestable organic material only, with stumps to remain (trees remaining post Partial Clearing works, with saplings, undergrowth and groundcover to remain intact). This area largely comprises the inundation area.

Localised grubbing and clearing will be required for establishing loading areas to facilitate the clearing works. Loading areas would be strategically placed in flat areas to maximise efficiency of the partial clearing works and minimise the number and size of loading areas required.

It is the intent of the Principal to retain and use non-commercially viable timber, saplings, undergrowth and organic matter as much as is practicable to minimise erosion of the Partial Works area (further detailed in the CSWMP). Forestry will ensure that the area has been left with soil in a stable condition for the successful construction contractor to complete the remainder of the site clearing and construction in future stages of the Project.

The Partial Clearing works will reduce the complexity of future stages of clearing works associated with the Project and prevent delays as a result of logistical and safety issues associated with multiple contractors undertaking clearing and construction activities concurrently. The minimising and avoidance of delays during clearing works will in turn minimise erosion and sedimentation risks by:

- Minimising the duration of exposure of disturbed areas
- Minimising the duration of ground disturbance works
- Reducing logistical and safety complexities which may compromise the implementation of environmental controls and measures outlined in this CEMP
- Minimising delays to the commencement of dam filling and wet commissioning of the Project

The Partial Clearing works covered under this CEMP are confined to vegetation clearing only. Minor earthworks may be required to facilitate access to the site and establish loading areas for the plant and equipment required to undertake the clearing.

1.2.1 Site mobilisation and preparation works

Site mobilisation and preparatory works would generally commence prior to the bulk of clearing works; however, initial clearing to facilitate access to the site may be required. Site mobilisation and preparation of the works area would include:

- installation of erosion and sediment control as outlined in the Construction Soil and Water Management Plan (CSWMP, Appendix B). Progressive erosion and sediment control would be installed during initial partial clearing activities required to facilitate access to the site for clearing plant and equipment.
- delineation of 'no-go zones' with the installation of high-visibility bunting to clearly mark these areas.
- implementation of a nest box strategy and other threatened fauna pre-clearing strategies as outlined in the Flora and Fauna Management Plan (FFMP; Appendix B).

1.2.2 Clearing within Partial Clearing works clearing boundary

The Partial Clearing works to be undertaken by Forestry would comprise clearing of harvestable timber for sawmill and pulpwood, through selective clearing of trees greater than 15cm in diameter, as well as all hollow-bearing Trees (HBTs). Figure 1-2 provides mapping of the locations of HBTs. The Partial Clearing works to be undertaken by the independent arborist contractor would comprise clearing of HBTs for the purpose of repurposing hollows into nest boxes for Project use as part of the Nest Box Management Plan (Appendix C).

Within Clearing Area 1 (refer Figure 1-3), localised grubbing of stumps, roots and organic material will be required around trees selected for clearing greater than 30cm in diameter. Grubbed stumps, roots and organic material will be spread over the disturbed area to provide soil and erosion stability. No grubbing will take place within gullies. This area largely comprises the permanent works design area.

Localised grubbing and clearing will be required for establishing loading areas to facilitate the clearing works. Loading areas would be strategically placed in flat areas to maximise efficiency of the partial clearing works and minimise the number and size of loading areas required.

As required, soil and erosion control works shall be completed progressively during clearing operations to minimise soil erosion. Soil and erosion control works shall be carried out in accordance with the conditions of the Development Consent, and the CSWMP (Appendix B).

The area within the clearing boundary, as shown in Figure 1-1, will be cleared by Forestry and the independent arborist contractor, with the remainder of clearing not undertaken as part of the Partial Clearing works to be completed by a construction contractor during future stages of the Project.

Clearing activities to be undertaken by Forestry would include:

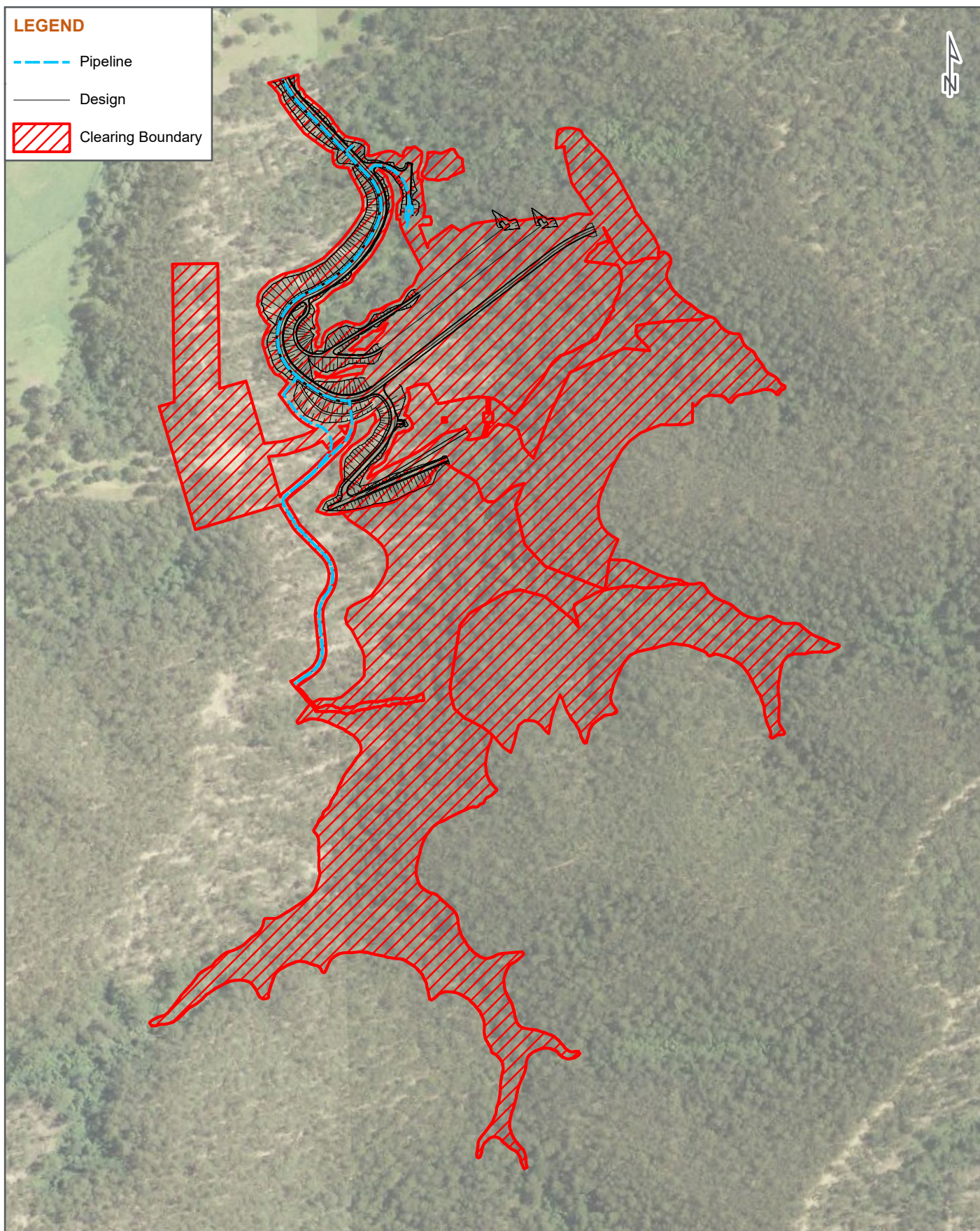
- harvestable trees will be cut down. Trunks and roots will be left in situ to minimise soil erosion. Where localised grubbing is required, grubbed organic material (trunks, roots) will be spread over the disturbed area to provide soil stability.
- clearing of HBTs with machinery in accordance with the methodology outlined in Section 4.7.2 of the CFFMP if it is unsafe or impractical to fell by the arborist by hand. Hollows will be set aside for the arborist and ecologist to assess their use for salvage and repurposing as nest boxes/ground habitat outside of the clearing area.
- harvestable timber will be removed from the site
- areas to be cleared and grubbed for loading areas will all occur within the clearing boundary and be constructed on flat areas. Sediment and erosion controls will be implemented as outlined within the CSWMP.

Clearing activities to be undertaken by the independent arborist contractor would include:

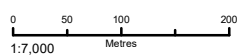
- felling of HBTs as identified by an ecologist in the pre-clearing survey prior to Forestry works in the immediate area, unless unsafe or impractical to do so.
- hollows subsequently identified as being appropriate for salvaging and repurposing as nest boxes/ground habitat outside of the clearing area will be cut off by chainsaw and, where possible, removed prior to forestry works in the immediate vicinity, or clearly marked and identified for Forestry to move during harvesting of that area.

LEGEND

-  Pipeline
-  Design
-  Clearing Boundary



DATE 13/12/2021



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COORDINATE SYSTEM
GDA 1994 MGA Zone 56

FIG NO. 1-1

FIGURE TITLE Extent of Partial Clearing works covered under this CEMP

PROJECT NO. 30012835

PROJECT TITLE Eurobodalla Southern Water Supply Storage Early Works - Partial Clearing works CEMP

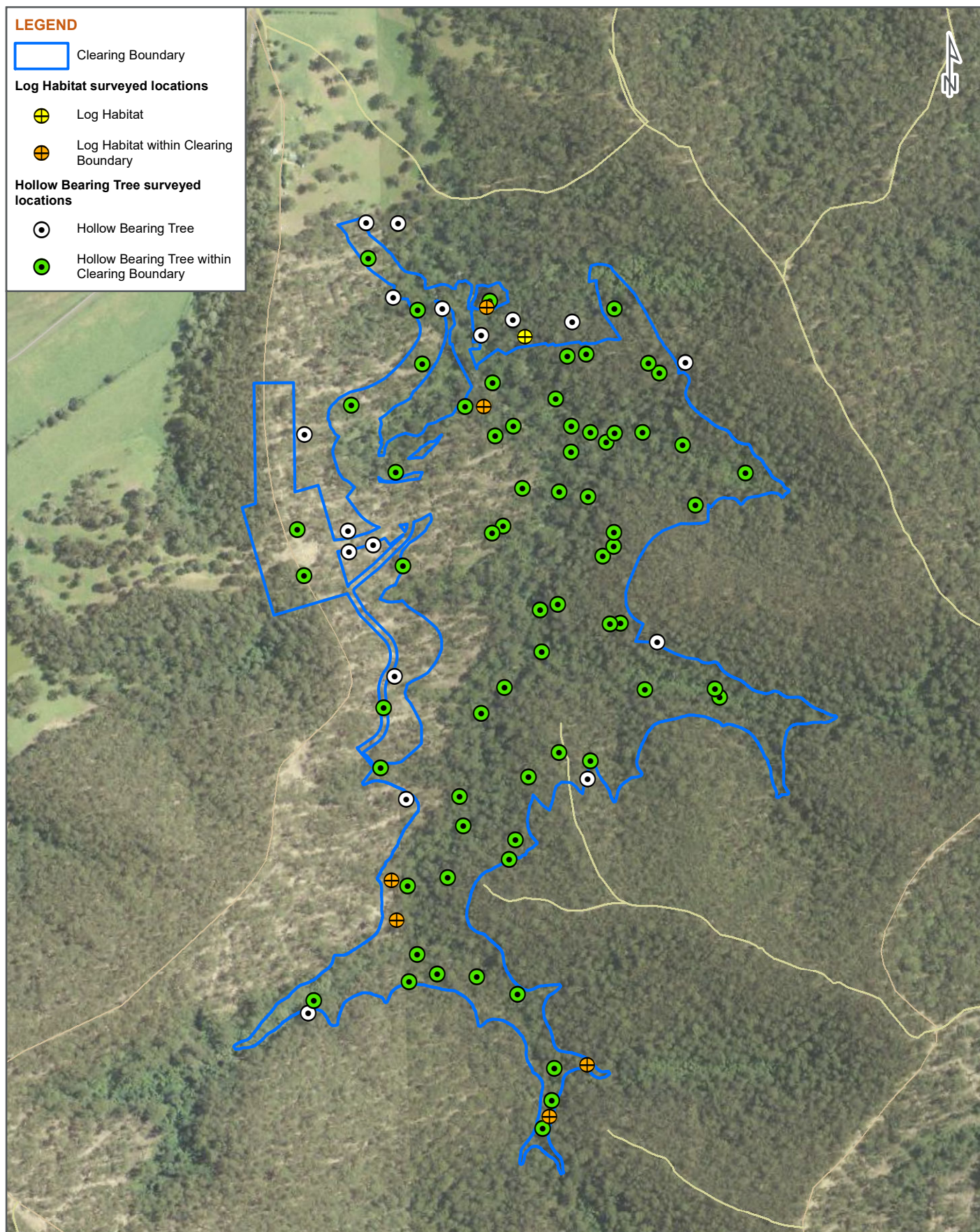
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PAGE SIZE A4

COORDINATE SYSTEM
GDA 1994 MGA Zone 56

FIG NO. 1-2

FIGURE TITLE Hollow-bearing tree mapping

PROJECT NO. 30012835

PROJECT TITLE Eurobodalla Southern Water Supply Storage Early Works -
Partial Clearing works CEMP

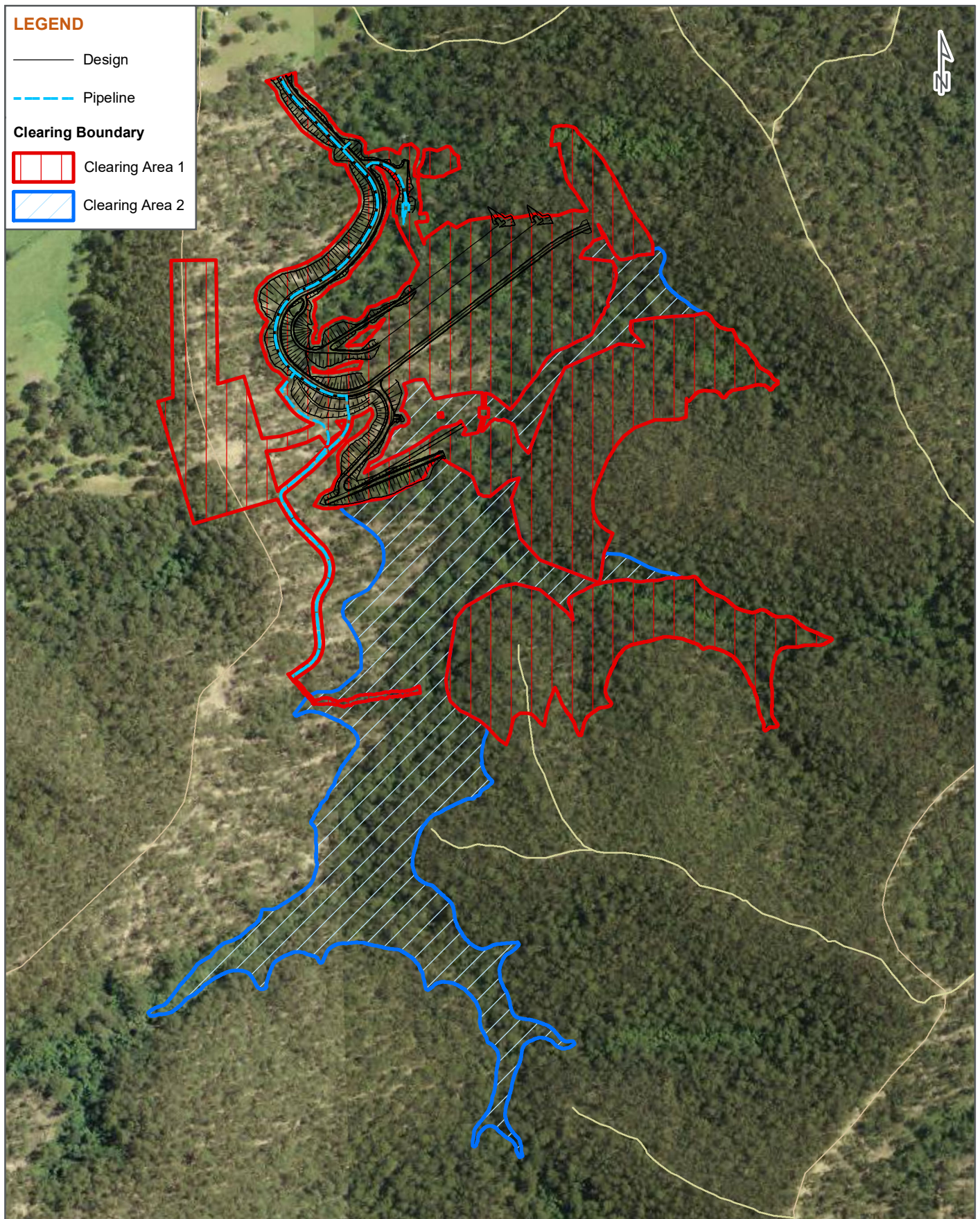
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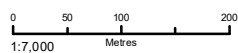


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FIG NO. 1-3

FIGURE TITLE Clearing Area Type Mapping

PROJECT NO. 30012835

PROJECT TITLE Eurobodalla Southern Water Supply Storage Early Works -
Partial Clearing works CEMP

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1.3 Construction program

Subject to approvals, the Partial Clearing works covered under this CFFMP will be undertaken by the Forestry and the independent arborist contractor from February 2022 to end of June 2022, with clearing of habitat trees occurring in February 2022 and the first 2 weeks of March 2022 to minimise disturbance to breeding of threatened fauna. Clearing of other non-habitat trees can be undertaken outside of this February-early March 2022 period.

Unless approval has been obtained from the Secretary, clearing activities on site can only be undertaken between the following hours:

- 7 am to 6 pm Monday to Friday
- 8 am to 1 pm Saturdays
- at no time on Sundays and NSW public holidays.

Works outside the hours outlined above may be undertaken under the following circumstances:

- works that are inaudible at the nearest sensitive receivers
- for the delivery of materials outside these hours as required by the NSW Police Force or other authorities for safety reasons
- where it is required in an emergency to avoid the loss of life, property or to prevent environmental harm
- where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is provided for the works.

1.4 Applicant

Eurobodalla Shire Council is the applicant for the Project.

1.5 Purpose of this CEMP

This CEMP covers the Partial Clearing works as discussed in Section 1.2 and shown in Figure 1-1. This CEMP has been prepared to outline and describe how Eurobodalla Shire Council will be responsible for the clearing activities outlined in Section 1.2.1, as part of the Project, and would comply with State Significant Development (SSD) 7089 Development Consent, the EIS, Addendum Submissions Report and any associated licences, permits and approvals required for the Project.

The CEMP specifically outlines how Eurobodalla Shire Council is to minimise environmental risks and achieve environmental outcomes for the Project by providing a structured approach to ensure appropriate mitigation measures and controls are implemented.

The CEMP has been prepared in accordance with the *Guideline for the Preparation of Environmental Management Plans* (DIPNR, 2004) and:

- describes the clearing activities to be undertaken and their timing
- identifies the planning approval requirements, legal obligations, permits, licences, standards and guidelines that clearing works are to adhere to
- provides specific mitigation measures and controls to be implemented on-site to avoid or minimise adverse environmental impacts
- describes the environmental management related roles and responsibilities including competence, training and awareness, effective communication and consultation processes
- outlines a monitoring, auditing and reporting regime to ensure compliance with the requirements including incident investigation and action response.

The requirements of Development Consent SSD-7089, including agency consultation, their relevance and where they are covered in this CEMP are provided in Section 2.

This CEMP is applicable to all staff and sub-contractors associated with the clearing activities covered under this CEMP.

1.6 CEMP Function

This CEMP has been prepared to satisfy conditions of Development Consent SSD 7089, specifically the conditions outlined in Table 1-1.

Table 1-1 Development Conditions relevant to the CEMP

Condition	Requirements
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions) (ii) any relevant limits or performance measures and criteria (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures (b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria (c) a program to monitor and report on the: (i) impacts and environmental performance of the development (ii) effectiveness of the management measures set out pursuant to paragraph (b) above (d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible (e) a program to investigate and implement ways to improve the environmental performance of the development over time (f) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria) (ii) complaint (iii) failure to comply with statutory requirements, and (g) a protocol for periodic review of the plan.
C2	The Applicant must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of Condition C1.
C3	As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following: • Construction Flora and Fauna Management Plan (Appendix B) • Construction Soil and Water Management Plan (Appendix C) • Emergency Response Procedures in the event of flooding and bushfire (Appendix D) • Construction Traffic Management Plan (Appendix E) • Construction Noise and Vibration Management Plan (Appendix F).
Appendix 2, item 1.2	As required relevant to the scope of construction works, the CEMP would include [additional] sub plans identified in the EIS safeguards and management measures and include: • Construction Air Quality Management Plan (Appendix G) • Construction Erosion and Sediment Control Plan (Appendix C)

Condition	Requirements
	Bushfire Management Plan (Appendix D).

1.7 Structure and CEMP revision

Table 1-2 outlines the structure and scope of this CEMP, highlighting how it been prepared to be consistent with the conditions of Development Consent SSD 7089.

Table 1-2 Structure of the CEMP

Section	Content
2	Strategic framework – provides an overview of the legislation relevant to environmental compliance of the Project
3	Implementation – How the Principal will implement their environmental management and compliance obligations
4	Accountability, competence and communications – who is accountable for implementing the CEMP and sub-plans, what competence those implementing the CEMP and sub-plans are required to have, and what the lines of communications are
5	Complaints, incidents and emergencies – procedures for recording and responding to complaints, incidents and emergencies
6	Non-compliance – what constitutes non-compliance, how to respond to non-compliance, corrective actions and notifications
7	Auditing and reporting – outline of the compliance auditing and reporting requirements

Eurobodalla Shire Council would review and, as required, update this CEMP and associated plans within one month of:

- an incident being reporting to DPIE (refer to Section 9 below)
- any modification to the existing Development Consent.

Any changes to the management plans must be approved by the Secretary, and in consultation with relevant agencies, before being implemented.

2 Strategic framework

2.1 Environmental strategy

Eurobodalla Shire Council's aim is to design, construct, operate, upgrade and decommission the Project in full compliance with Development Consent SSD 7089. Condition A.2 of the Development Consent states:

The Applicant must carry out the development:

- (a) in compliance with the conditions of this consent
- (b) in accordance with all written directions of the Planning Secretary
- (c) in accordance with the EIS and response to submissions
- (d) in accordance with the Development Layout shown in the Development Consent, Appendix A
- (e) in accordance with the revised management and mitigation measures in Appendix 2 of the Development Consent, Appendix A.

2.2 Legislative requirements

Table 2-1 sets out the environment and planning law requirements for the Project.

Table 2-1 Register of legal requirements

Legislation	Requirement	Authority
<i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)	The Eurobodalla Southern Water Supply Storage Project was not considered to be a controlled activity under the EPBC Act	Department of Agriculture, Water and the Environment
<i>Environmental Planning and Assessment Act 1979</i>	Changes to the approved scope of SSD-7089 would require modification to the project approval under the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act).	DPIE
<i>Protection of the Environment Operations Act 1997</i>	Any unauthorised pollution of waters is considered an offence under section 120 of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act). Section 148 of the POEO Act requires that the Environment Protection Authority (EPA), the Minister of Health, SafeWork NSW, Fire and Rescue NSW and Eurobodalla Shire Council be notified immediately if a pollution incident occurs that may cause or threaten material harm to the environment (being environmental harm that is not trivial or would cost more than \$10,000 to rectify). Note that the EPA is required to be notified verbally, immediately in these circumstances, prior to written notification being provided to DPIE (as per Condition C9 of Development Consent SSD-7089). Sections 139 and 140 of the POEO Act set out offences relating to noise pollution.	EPA
<i>Biodiversity Conservation Act 2016</i>	Part 1, Divisions 1 and 2 set out requirements with respect to threatened flora and fauna species and communities within NSW, as well as protected species more generally (i.e., any native flora or fauna species regardless of its threatened status). The EIS included a Biodiversity Assessment Report, and a Biodiversity Offset Strategy has been developed and approved by DPIE.	Biodiversity Conservation Division, DPIE

Legislation	Requirement	Authority
<i>National Parks and Wildlife Act 1974</i>	Protection of Aboriginal Objects and Places. Duty to notify Heritage NSW in the event that an Aboriginal object is uncovered during the works.	Heritage NSW
<i>Biosecurity Act 2015</i>	Priority weeds are regulated under the <i>Biosecurity Act 2015</i> with a general biosecurity duty to prevent, eliminate or minimize any biosecurity risk they may pose. Some priority weeds have additional management obligations which may apply generally, or under specific circumstances. Any person who deals with any plant, who knows (or ought to know) of any biosecurity risk, has a duty to ensure the risk is prevented, eliminated or minimised as far as is reasonably practicable.	Department of Primary Industries (DPI)
<i>Rural Fires Act 1997</i>	Sections 63(1) and 63(2) of the <i>Rural Fires Act 1997</i> require public authorities and owners/occupiers of land to take all practicable steps to prevent the occurrence of bushfires on, and to minimise the danger of the spread of bushfires on or from, that land.	Rural Fire Service
<i>Contaminated Land Management Act 2017</i>	As per Section 6 of the <i>Contaminated Land Management Act 2017</i> , ensure only EPA-approved VENM and ENM are brought to site, keep records of the same and provide copies to DPIE if requested.	EPA
<i>Fisheries Management Act 1994</i>	Section 37 of the <i>Fisheries Management Act 1994</i> requires a permit be obtained from DPI – Fisheries where fish are to be relocated during in-stream works. The EIS and Statement of Commitments for SSD-7089 also refer to the need to obtain a Section 219 permit for blocking fish passage during construction works where fish passage would become blocked. However, Section 4.41 of the EP&A Act provides a blanket exemption for all SSD projects to obtain such a permit under Section 219 of the <i>Fisheries Management Act 1994</i> . This matter is to be resolved with DPI – Fisheries in the event that fish passage is to be blocked.	DPI - Fisheries
<i>Water Sharing Plan for the Tuross River Unregulated and Alluvial Water Sources 2016.</i>	Water extracted from the Tuross River for use as construction process water during storage site clearing is to be in accordance with Water Access Licences held by Eurobodalla Shire Council under the Water Sharing Plan for the Tuross River Unregulated and Alluvial Water Sources 2016.	DPIE - Water

2.2.1 Environmental Planning and Assessment Act 1979

The EP&A Act establishes the framework for environmental planning and assessment in NSW. Part 4 of the EP&A Act provides for development that requires consent under an Environmental Planning Instrument. Division 4.7 (previously Part 4, Division 4.1) of Part 4 deals with SSD which due to the size, economic value or potential impacts of the development, is deemed to have State significance. Section 4.36 provides for certain types of development or development on specified land to be declared SSD by means of a State Environmental Planning Policy or by a Ministerial Order. The full list of SSD development types and identified sites is provided in Schedules 1 and 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

Section 4.38 of the EP&A Act provides for the Minister for Planning to be the consent authority for SSD. However, Section 2.4 provides for the Minister to delegate the consent authority function to the Planning Assessment Commission, the Secretary of DPIE or to any other public authority.

An EIS was prepared on behalf of the Applicant, Eurobodalla Shire Council, under Part 4, Division 4.7 of the EP&A Act as SSD-7089. The EIS went on public exhibition in September 2018 and a Submissions Report was subsequently prepared

to outline the responses to submissions received. The Project was approved by DPIE as the determining authority, on 17 October 2019, and Development Consent SSD-7089 issued.

All personnel associated with the Partial Clearing works for the Project as discussed in Section 1.2.1, must comply with all environmental requirements for the Project, including Development Consent SSD-7089, legal and statutory requirements, permits, licences, standards and guidelines. The conditions of Development Consent SSD-7089 relating to the Project and their applicability to the storage site clearing are outlined in Table 2.2.

As the Project was determined to be SSD, it must also comply with the relevant guidelines for SSD under the EP&A Act. Section 4.41 of the EP&A Act specifies the approvals, permits, licences that do not apply to an approved SSD project, and those that must be applied consistently along with Development Consent SSD-7089.

Table 2-2 Conditions of Development Consent SSD-7089

Condition reference	Condition Requirement	Condition Delivery
B2	No more than 54.61 ha of native vegetation is to be cleared	The Partial Clearing works area clearing boundary encompasses an area of 43.58 ha. The Partial Clearing works would comprise clearing of harvestable timber for sawmill and pulpwood, through selective clearing of trees greater than 15cm in diameter, as well as all HBTs. Localised grubbing and clearing will be required within Clearing Area 1 (Figure 1-3) for harvestable trees greater than 30cm in diameter. No grubbing will occur within gullies. Localised grubbing and clearing will be required for establishing loading areas to facilitate the Partial Clearing works. The remainder of vegetation within the clearing boundary not cleared as part of the Partial Clearing works, will be cleared in future stages of works for the Project. In total the Project will not clear more than 54.61 ha of native vegetation.
B3	Prior to clearing of native vegetation, the Applicant must prepare a Construction Flora and Fauna Management Plan (CFFMP) in consultation with DPIE Fisheries and to the satisfaction of the Planning Secretary.	CFFMP included as Appendix C.
B4	The CFFMP must form part of the CEMP required by Condition C2 and, in addition to the general management plan requirements listed in Condition C1, the CFFMP must include the following: (a) measures to ensure biodiversity values not intended to be impacted are delineated by mapping of 'no-go areas' and the installation of on-site measures such as temporary exclusion fencing prior to clearing; (b) measures to minimise the risk of introducing weed species via construction vehicles, plant and equipment and control of pest and weed species existing at the site; (c) method of vegetation removal and measures to minimise impacts outside the water storage facility construction boundary and within the perimeter road construction boundary as a result of the equipment used for clearing and general access for heavy vehicles and construction plant and equipment; (d) options to reuse cleared vegetation, in preference to burning, such as relocation of hollow logs for habitat and mulch for use in areas to	CFFMP included as Appendix C. The requirement for new storage access road batters is not relevant to this stage of works. A cofferdam is not required as part of the works covered under this CEMP. No river-bed exposure would occur during the works covered by this CEMP.

Condition reference	Condition Requirement	Condition Delivery
	be revegetated within the site and use elsewhere within the local area; (e) measures to minimise the impacts on fauna within the site including the installation of nest boxes prior to clearing, relocation of fauna to adjacent habitat (including any fish during dewatering of the cofferdam), staged clearing and timing of clearing outside breeding seasons; and (f) details on rehabilitation and revegetation including: (i) use of locally indigenous plant species including collection of seed prior to clearing for this purpose; (ii) for construction areas outside the full supply level including the construction compounds, on-site quarry areas and the new storage access road batters; (iii) for the construction area at the existing water treatment plant (WTP) including for the bed and banks of the Tuross River affected by the temporary cofferdam.	
B5	Prior to removing/clearing any vegetation or any demolition, pre-clearing surveys and inspections for threatened species must be undertaken. The surveys and inspections, and any subsequent relocation of species and associated management measures, must be undertaken under the guidance of a suitably qualified and experienced ecologist.	CFFMP included as Appendix C.
B6	Applicant must: (a) not commence any clearing work until the CFFMP is approved by the Planning Secretary; and (b) implement the most recent version of the CFFMP approved by the Planning Secretary for the duration of works.	CFFMP included as Appendix C.
B13	Prior to commencement of any surface disturbance the Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) as part of the CEMP required by Condition C2. The CSWMP must be prepared by a suitable qualified person(s) in consultation with the EPA and include: (a) guidelines and procedures to reuse dirty water collected in sediment basins with reuse prioritised over discharge to receiving waters;	CSWMP included as Appendix B.

Condition reference	Condition Requirement	Condition Delivery
	(b) an assessment of cumulative risks associated with sediment pond settling agents; (c) discharge criteria based on an assessment of potential impacts against the NSW Water Quality Objectives (WQO) for receiving waters; (d) identification and implementation of mitigation measures to avoid pollution including, but not limited to, dosing procedures, discharge procedures, direct ecotoxicology testing; (e) a detailed Erosion and Sediment Control Plan prepared in consultation with DPIE Fisheries and Water (in addition to the EPA); and (f) evidence of consultation with the EPA and DPIE Fisheries and Water.	
B14	Erosion and sediment control measures must: (a) be in accordance with the relevant requirements of Managing Urban Stormwater: Soils and Construction Volume 1 (Landcom, 2004) and mitigation measures outlined in the Policy and Guidelines for Fish Habitat Conservation and Management (DPI 2013); and (b) have sediment basins sized to a 90th or 95th percentile 5-day rainfall depth or as otherwise agreed with the EPA during the preparation of the Erosion and Sediment Control Plan referred to in Condition B13(e).	CSWMP included as Appendix B. Erosion and Sediment Control Plan (ESCP) included as Section 6 of the CSWMP.
B15	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an Environmental Protection Licence (EPL).	Construction activities governed by this CEMP would comply with s.120 of the POEO Act. Construction activities governed by this CEMP do not require an EPL. The CSWMP (Appendix B) includes an ESCP which would be implemented to avoid pollution of waters.
B16	The Applicant must store all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids.	Refer to Section 3.5.

Condition reference	Condition Requirement	Condition Delivery
B17	In the event of an inconsistency between the requirements Conditions B16(a) and B16(b), the most stringent requirement must prevail to the extent of the inconsistency.	Refer to Section 3.5.
B20	The CEMP required by Condition C2 and OEMP required by Condition C5 must include emergency response procedures in the event of flooding or bushfire.	Fire and Emergency Response Plan included as Appendix G.
B25	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent	Section 3.5 of the CSWMP includes provisions to manage dust. Air Quality Management Plan (AQMP) provided in Appendix F includes dust management procedure.
B26	During construction, the Applicant must ensure that: (a) unsealed roads used for truck access and exposed surfaces and stockpiles within the construction area are regularly watered to suppress dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) measures are implemented to minimise dust from exposed surfaces following vegetation clearing and until transfer of storage water to the WTP.	Section 3.5 of the CSWMP includes provisions to manage dust. Air Quality Management Plan (AQMP) provided in Appendix F includes dust management procedure.

2.2.2 Protection of the Environment Operations Act 1997

The POEO Act regulates certain activities related to air, water and noise pollution, and waste. Schedule 1 of the POEO Act identifies activities and thresholds related to activity types and volume(s) of emissions that require an EPL to be issued by the EPA. Water storages and related infrastructure are not included in Schedule 1.

The activities to be carried out for the storage site clearing do not meet the criteria specified in Schedule 1 of the POEO Act. Therefore, an EPL is not required to be issued by the EPA.

The POEO Act also identifies a number of pollution offences, including offences relating to:

- the wilful or negligent disposal of waste in a manner that harms or is likely to harm the environment
- the wilful or negligent causing of a substance to leak, spill or otherwise escape (whether or not from a container) in a manner that harms or is likely to harm the environment
- the wilful or negligent causing of any controlled substance to be emitted into the atmosphere in contravention of the regulations under the *Ozone Protection Act 1989* and in a manner that harms or is likely to harm the environment
- water pollution
- air pollution
- noise pollution
- land pollution and waste.

Part 5.7 of the POEO Act specifies a general duty to notify the relevant authority (defined in Subsection 148(8)) of a pollution incident where there is actual or potential material harm to the environment. The activities associated with the storage site clearing are to be managed to ensure pollution risks are minimised. Measures were included in the EIS to ensure risks to soils, waterways and air quality are avoided or minimised. The EPA is to be notified if a 'pollution incident' occurs that causes or threatens 'material harm' to the environment, along with Minister of Health, SafeWork NSW, Fire and Rescue NSW and Eurobodalla Shire Council.

Legal requirements for the management of waste are also established under the POEO Act and the *Protection of the Environment Operations (Waste) Regulation 2005*. Unlawful transportation and deposition of waste is an offence under Section 143 of the POEO Act.

Schedule of 8 of the *Protection of the Environment Operations (Clean Air) Regulation 2010*, identifies Eurobodalla Local Government Area as an area in which all burning (including vegetation and domestic waste) is prohibited except with approval.

2.2.3 Permits and licensing requirements

Environmental objectives and targets have been developed to evaluate environmental performance during the early works construction activities and guide the implementation of the development of any management measures required. These are outlined in Table 2-3.

Table 2-3 Project environmental objectives

Objective	Target	Measurement/Tool
Compliance with the Conditions of Development Consent SSD-7089	All relevant Conditions of Development Consent SSD-7089 implemented throughout the construction of Access road and pipeline in accordance with requirements and within designated time frames. No non-conformances identified during self-regulation through monitoring and auditing.	Site inspections Auditing Review
Compliance with all legal requirements	No breaches or environmental infringement notices.	Site inspections Auditing Review

3 Implementation

3.1 Construction Environmental Management Plan

The CEMP is the primary environmental management document governing environmental performance during activities detailed in Section 1.2.1. The CEMP is supported by several aspect-specific sub management plans which provide additional environmental management requirements. The sub plans prepared as part of the CEMP include:

- CSWMP and ESCP, Appendix B
- CFFMP, Appendix C
- Construction Traffic Management Plan, Appendix D
- Construction Noise Management Plan, Appendix E
- Construction Air Quality Management Plan, Appendix F
- Fire and Emergency Response Plan, Appendix G.

In addition to the sub-plans, an Unexpected Finds Procedure is provided (Appendix H). This procedure must be complied with during the Partial Clearing works detailed in Section 1.2.

3.2 Waste management

A Waste Management Register will be maintained until the completion of the Partial Clearing works and will include:

- the classification according to the EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014)
- volume of waste
- evidence of disposal to a facility that may lawfully accept the waste or reuse location.

3.3 Heritage

If any item or object of Aboriginal cultural heritage significance is identified on site during the Partial Clearing works detailed in Section 1.2, the following must occur:

- all work within a 10 metre area surrounding the suspected Aboriginal item or object is to cease immediately
- a 10 metre buffer area around the suspected item or object is to be cordoned off and Heritage NSW is to be notified immediately
- work within a 10 metre area surrounding the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the *National Parks and Wildlife Act 1974*.

If any unexpected archaeological relics are uncovered during the Partial Clearing works detailed in Section 1.2:

- all work within a 10 metre area surrounding the find is to cease immediately
- Heritage NSW is to be notified
- a suitably qualified and experienced archaeologist is to be engaged to record and assess the significance of the find and the results are to be reported to the Secretary of DPIE and the Heritage Division DPC
- where required by Heritage NSW, a Management Strategy is to be developed and implemented in consultation with the Heritage NSW
- work within a 10 metre area surrounding the find may only recommence on the advice of the archaeologist.

No potential archaeological deposits were identified within the Partial Clearing works clearing boundary during surveys undertaken to inform the EIS. Known potential archaeological deposits (PAD) occur in proximity to the Storage Access Road. The alignment of the Storage Access Road and Storage Inlet Pipeline was designed to avoid these deposits. These PAD areas would be protected during works to ensure no inadvertent impacts occurred.

3.4 Site management

General site management procedures to be implemented during the Partial Clearing works detailed in Section 1.2 include:

- the work site is to be maintained in an orderly manner to reduce the potential visual impact

- any damage to local roads that occurs due to the construction activities outlined in Section 1.2.1 of this CEMP is to be repaired by the party responsible for the damage as soon as practical
- mud tracking off the site and onto the local roads is to be monitored, and local roads are to be cleared of mud should this occur
- all plant and equipment are to be maintained to minimise the risk of pollution to the environment.

3.5 Contamination, spill prevention and response

The following controls must be implemented to minimise the risk of site contamination during the Partial Clearing works detailed in Section 1.2:

- vehicles and machinery are to be maintained to minimise the risk of fuel/oil leaks. Routine inspections for evidence of fuel/oil leaks are to be carried out on all vehicles and machinery
- all fuels, chemicals and hazardous liquids are to be stored within an impervious bunded area in accordance with Australian standards and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual
- refuelling would only occur in an appropriately contained area
- a spill kit is to be located at the site compound. If a spill occurs, it is to be managed according to the following:
 - check for any hazards to the responder or other personnel
 - control the source of the spill, following the Safety Data Sheet instructions for Personal Protective Equipment and handling
 - contain the spread of the spill, if safe to do so
 - clean up the spill
 - document the spill in the Incident Management Procedure
 - some spills may require external reporting (refer to Section 6).

4 Accountability, competence and communications

4.1 Responsibilities and accountabilities

Table 4-1 below outlines the roles and responsibilities of personnel responsible for carrying out the requirements outlined in this CEMP.

Table 4-1 Partial Clearing works roles and responsibilities

Role	Responsibility
Forestry Project Manager	- include environment considerations in all aspects of project planning - allocate project resources to handle environmental issues - ensure suppliers and contractors comply with environmental requirements - investigate and ensure that environmental incidents are reported and recorded - review the performance of environmental management - ensure environmental inspections are conducted.
Forestry Site Supervisor	- communicating with all personnel and sub-contractors regarding compliance with the CEMP and site specific environmental issues - notification of environmental incidents - coordinating the implementation of the CEMP - undertaking site inspections - co-ordinating the implementation and maintenance of pollution control measures - identifying resources required for implementation of the CEMP - coordinating action in emergency situations and allocating required resources in accordance with the Incident Response Plan - notify the Project Manager of any environmental harm or potential environmental harm, or if authorised by the Project Manager notify the Client - ensuring that instructions are issued, and adequate information is provided to site resources which relate to environmental risks on site.
Contractors (including independent arborist)	- contribute to effective environmental management at the site for the life of the project, by implementing this CEMP within their area of responsibility - comply with the relevant Act(s), Regulations, Specifications and Standards - promptly report to management any environmental non-conformances, incidents and/or breaches - participate in environmental awareness training as directed.

4.2 Competence, training and awareness

Onsite environment training would be coordinated and recorded by the Site Supervisor. Records must include details of topics discussed, attendees, and duration of discussion. These will be stored in the training register, along with a signed attendance sheet.

4.2.1 Environmental induction and awareness

All contractors involved in the Partial Clearing works covered by this CEMP are required to attend a health, safety, quality and environment induction prior to commencing work. The induction is to cover core issues including (but not limited to):

- purpose and objectives of the CEMP
- requirements of due diligence and duty of care
- conditions of environmental permits and approvals
- potential environmental emergencies and emergency response procedures
- reporting and notification requirements for pollution and other environmental incidents

- high-risk activities and associated environmental safeguards
- working in or near environmentally sensitive areas
- traffic management, including clear instructions to all contractors with regards to speed limits, approved access tracks, approved working hours and delivery times
- unexpected finds procedure (Appendix D)
- all relevant noise and vibration management measures including:
 - avoiding use of radio during work outside normal hours
 - avoiding shouting and slamming doors
 - operating machines at low speed or power and switching off when not being used rather than left idling for prolonged periods, where practical
 - Minimising reversing
 - Avoid metal to metal contact.

4.2.2 Toolbox talks, training and awareness

Daily pre-start toolbox meetings are to be undertaken by the Site Supervisor or delegate. All contractors for the Partial Clearing works governed by this CEMP that undertake work at site are required to attend. Toolbox meetings are to include provision of information about health and safety, environmental aspects, impacts and risks relevant to the proposed work activities and location. Attendance, meeting content and issues raised are to be recorded.

Specific environmental toolbox meetings may be developed and implemented as required at the discretion of the Site Supervisor. Relevant environmental issues for discussion may include (but are not limited to):

- waste management
- erosion and sediment control
- noise and vibration control
- environmental monitoring
- emergency response procedures
- environmental reporting
- traffic and transport
- flora and fauna management
- relevant licences and approval conditions
- permissible hours of work
- location of nearest sensitive receivers
- construction employee parking areas
- designated loading/unloading areas and procedures
- site opening/closing times.

A register of lesson learnt is to be maintained by the Site Supervisor for the Partial Clearing works governed by this CEMP. These are to be included in inductions and daily pre-start meetings as necessary and appropriate.

4.3 Emergency contacts, general communications and consultation

4.3.1 Emergency contacts

Emergency contact details relevant to the Partial Clearing works detailed in Section 1.2 are provided in Table 4-2.

Table 4-2 Emergency contact details relevant to the Partial Clearing works

Organisation / Project Position	Responsible representative	Contact details
EPA pollution hotline	-	131 555
DPI - Fisheries	Carla Ganassin	Carla.ganassin@dpi.nsw.gov.au
Fire and Rescue NSW	-	000 (for incidents that present an immediate threat to human health or property) or 1300 729 579 (for incidents that do not present an immediate threat to human health or property)
Southern NSW Local Health District	-	1300 066 055
SafeWork NSW	-	131 050
Eurobodalla Shire Council	Harvey Lane - Engineer	harvey.lane@esc.nsw.gov.au 02 4474 1342
Public Works Representative	Ross Bailey Public Works Advisory	02 4474 7556 0412 320 064
Forestry	Site Supervisor	TBA
Independent arborist contractor	-	TBA

4.3.2 Internal communications

Regular internal communications are to be carried out between the project team, including sub-contractors. Internal lines of communication are to include:

- meetings
- phone calls
- written correspondence, including:
 - management reports
 - site inspection reports
 - audit reports
 - incident reports
- employee induction, toolbox talks, daily pre-start meetings
- notice boards, alerts and notifications.

4.3.3 External communications

Eurobodalla Shire Council will be responsible for consultation with government authorities (as required), key stakeholders and the community. Government agencies, including the NSW EPA, Department of Industry (DoI) - Water, DoI – Fisheries and DPIE have been consulted during preparation of the EIS and this CEMP and sub plans.

At the commencement of construction activities as outlined in this CEMP, until the completion of all works, the following information and documents would be made publicly available:

- SSD 7089 conditions of Development consent
- Eurobodalla Southern Water Supply Storage Project EIS
- Eurobodalla Southern Water Supply Storage Project EIS response to submissions
- site construction layout
- management and mitigation measures
- all statutory approvals relevant to the Partial Clearing works detailed in Section 1.2
- all strategies, plans and programs required under the conditions of the Development Consent
- reporting on environmental performance in accordance with the reporting requirements in any plans or programs approved under the conditions of the Development Consent
- compliance report.

4.3.4 Community and stakeholder communication

Community and stakeholder engagement for Partial Clearing works would include:

- notice to local residents of proposed clearing activities provided at least 5 days prior to commencement of activities
- as required, local residents are to be informed of any changes construction activities that may impact upon them
- in the event that works may produce noise at levels that may impact sensitive receivers, the affected receivers would be consulted regarding proposed noise mitigation measures
- where dust and air quality complaints are received, the cause would be identified, and appropriate measures implemented as soon as possible to reduce emissions. Details of the complaint and rectification actions would be recorded.

There were no businesses identified in proximity to the clearing works outlined in Section 1.2. As such, there is not expected to be impact to local business. Due to the limited anticipated impact of the activities covered by this CEMP as detailed in Section 1.2, a project hotline would not be established.

5 Complaints, incidents and emergencies

A Fire and Emergency Response Plan is provided in Appendix G.

5.1 Incident notification and reporting

Eurobodalla Shire Council is the person undertaking the activity, and the occupier of the premises and is therefore responsible for incident notification. Eurobodalla Shire Council would therefore be required to immediately notify the EPA in the event of a 'material harm' Incident occurring.

Under section 147 of the POEO Act, a 'material harm' incident is defined as:

1. for the purposes of this Part—
 - (a) *harm to the environment is material if*
 - (i) *it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
 - (ii) *it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*
 - (b) *loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*
2. for the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Where a potential material harm incident occurs, the EPA should be notified immediately by calling 131 555. Following notification to the EPA, Eurobodalla Shire Council should immediately notify the Minister of Health, SafeWork NSW and Fire and Rescue NSW. Once these verbal notifications occur, DPIE should be provided with written notification (via email to: compliance@planning.nsw.gov.au). The latter requirement to undertake incident reporting and notification to DPIE complies with Condition C9 Development Consent SSD-7089 and is the responsibility of Eurobodalla Shire Council. This written notification is required to be emailed to DPIE immediately (but following the above verbal notifications) in the event of a potential material harm incident occurring.

Eurobodalla Shire Council should clarify who is responsible for providing these notifications, and what steps should be taken where a material harm incident occurs out of hours.

5.2 Complaints management

5.2.1 Means of making a complaint

Prior to the commencement of the construction activities outlined in Section 1.2.1, Eurobodalla Shire Council would ensure that the following contact details are available for the community to make a complaint:

- a phone number available to call 24 hours a day
- a postal address to which written complaints may be sent
- an email address to which electronic complaints may be transmitted.

These details should be provided on the on the project website. They are also specified in Table 4-2.

5.2.2 How any complaint will be handled

Any complaint received will be immediately logged by Eurobodalla Shire Council or delegate in a Complaints Register. As soon as is practicable Eurobodalla Shire Council will investigate the cause of the complaint and identify any actions required to avoid a recurrence. Regardless of the circumstance, an initial response to the complaint would be completed with 24 hours of its receipt.

If requested when the complaint is received, Eurobodalla Shire Council will also contact the complainant to discuss the issue, the cause and advise them of the actions taken to avoid a recurrence.

The complaint investigation and complainant contact would be documented using a Complaint Record maintained by Eurobodalla Shire Council and the Complaints Register would be updated.

5.2.3 Recording complaints

Every complaint would be recorded in a Complaints Register (cross referenced against an individual Complaint Record). The requirements of the Complaints Register and Complaints Record are discussed below.

5.2.3.1 Complaints Register

The Complaints Register will record:

- a complaint reference number
- the date and time the complaint was received
- whether the complainant wanted to be contacted
- nature of the complaint.

The Complaints Register would be a publicly available document, therefore details of the complainant would not be included in the Complaints Register.

5.2.3.2 Complaint record

Every complaint received would be recorded using a Complaint Record that details:

- the date and time of the complaint
- the means by which the complaint was made (e.g., telephone, mail or email)
- any personal details of the complainant that were provided, or if no details were provided a note to that effect
- the nature of the complaint
- any actions taken in relation to the complaint, including timeframes for implementing the action
- if no action is undertaken in relation to the complaint, the reasons why no action was taken
- if the complainant wanted to be contacted, whether the action taken was considered acceptable to the complainant.

A copy of every Complaints Record would be held on-site and, on request, be provided to:

- the DPIE
- the Environment Protection Authority (EPA)
- the complainant.

Each Complaint Record would contain personal information of the complainant; therefore, the Complaint Record would not be made publicly available on the project website.

5.3 Emergency response and management

In addition to the requirements specified in the Fire and Emergency Response Plan (Appendix G), the DPIE must be notified in writing to compliance@planning.nsw.gov.au immediately after an incident occurs. The notification will include the following information:

- development application number SSD7089
- name of the development – Eurobodalla Southern Water Supply Storage Project
- details of the incident including date, time, location, a brief description of what occurred and why it is classified as an incident
- how the incident was detected
- when the incident became known
- identify any actual or potential non-compliance with conditions of consent
- describe what immediate steps were taken in relation to the incident
- identify further action(s) that would be taken in relation to the incident
- identify a project contact for further communication regarding the incident.

6 Non-compliance

6.1 Commitment

Eurobodalla Shire Council agree that a failure to comply with any relevant condition of Development Consent (SSD 7089), conditions within the EIS or statutory approval would constitute a non-compliance.

6.2 Response

In the event of a non-compliance, Eurobodalla Shire Council would undertake the steps outlined in Table 6-1, consistent with the guidance advice for ISO 14001 –Environmental management systems.

Table 6-1 Non-compliance response

Step	Action
React	React to the non-compliance and, as applicable: - act to control and correct the non-compliance - deal with the consequences, including mitigating adverse environmental impacts associated with the non-compliance.
Evaluate	Evaluate the need for action to eliminate the cause of the non-compliance in order that it does not reoccur or occur elsewhere by: - reviewing the non-compliances - determining the cause of the non-compliances - determining if similar non-compliances exist or could potentially occur.
Act	Implement any action required to rectify the non-compliance.
Review	Review the effectiveness of any corrective action taken.
Change	Make changes to the environmental management plans, if necessary

6.3 Corrective action

Any non-compliance would trigger a Corrective Action appropriate to the significance of the effect of the non-compliance. Eurobodalla Shire Council would retain documented information as evidence of the nature of the non-compliance and any subsequent actions taken, and the results of the Corrective Action.

6.4 Notification

Following a non-conformance incident, the DPIE must be notified in writing to compliance@planning.nsw.gov.au within seven days of the non-compliance becoming known.

In reporting the non-compliance, the notification must identify the following:

- development application number SSD7089
- name of the development – Eurobodalla Southern Water Supply Storage Project
- the condition of consent that has been breached
- outline how the condition has not been met and the reasons for the non-compliance (if known)
- what actions have been, or will be, undertaken to address the non-compliance

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

7 Auditing and reporting

7.1 Environmental monitoring and reporting

Any required aspect specific environmental monitoring will be detailed within the relevant sub-plans.

7.2 Management reviews

The Applicant, Eurobodalla Shire Council is responsible for all relevant reporting requirements specified in Development Consent SSD-7089.

Reviews of the CEMP and associated environmental management sub-plans are to be undertaken by Eurobodalla Shire Council, where required, as part of a continual improvement process. As the program of Partial Clearing works covered by this CEMP, as detailed in Section 1.2.1, is only five months (February 2022 to end of June 2022). Reviews are unlikely to be necessary. Should a review be necessary, the review is to consider:

- additional processes or management that would improve the environmental performance of the Access road and pipeline activities
- compliance with a direction, strategy, plans and/or program required under the Conditions of Development Consent SSD-7089, to the satisfaction of DPIE.

Where revisions are required, the revised document must be submitted to the Secretary of DPIE for approval within six weeks of the review.

Revised strategies, plans and programs required as a part of the conditions of approval for SSD-7089, must also be submitted to the Secretary of DPIE within three months of:

- there is an environmental incident with circumstances that have caused or threatened to cause material harm to the environment, and an incident report was been prepared
- in the event that the procedure for investigating and responding to a complaint, including the implementation of measures for avoiding a recurrence, cannot be resolved to the satisfaction of a third party, and a dispute has arisen
- the approval of any modification to Development Consent SSD-7089
- the issue of a direction of the Secretary of DPIE which outlines the requirement for a review.

The continuous improvement process is to be designed to:

- identify areas of opportunity for improvement of environmental management and performance
- determine the cause or causes of non-conformances and deficiencies
- develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies
- verify the effectiveness of the corrective and preventative actions
- document any changes in procedures resulting from process improvement
- make comparisons with objectives and targets.

Appendix A Development Consent

Appendix B Construction Soil and Water Management Plan

Appendix C Construction Flora and Fauna Management Plan

Appendix D Construction Traffic Management Plan

Appendix E Construction Noise Management Plan

Appendix F Air Quality Management Plan

Appendix G Fire and Emergency Response Plan

Appendix H Unexpected Finds Procedure

Unexpected item discovered

1. Stop work, protect item and inform Project Manager

2. Contact and engage an archaeologist, and where required, an Aboriginal Site Officer.

3. Complete a preliminary assessment and recording of the item

4. Formulate an archaeological or heritage management plan

5. Formally notify the regulator by letter, if required

6. Implement archaeological or heritage management plan

7. Review CEMPs and approval conditions

8. Resume work

Item not heritage

local people
global experience

SMEC is recognised for providing technical excellence and consultancy expertise in urban, infrastructure and management advisory. From concept to completion, our core service offering covers the life-cycle of a project and maximises value to our clients and communities. We align global expertise with local knowledge and state-of-the-art processes and systems to deliver innovative solutions to a range of industry sectors.