

HASLIN

Construction Environmental Management Plan Eurobodall Southern Water Supply Storage



List of emergency and key contacts

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Glossary/Abbreviations

Term / Abbreviation	Definition / Expanded text
Application Number	SSD 7089
CEMP	Construction Environmental Management Plan
CEMS	Contractors Environmental Management System
Compliance audit	Verification of how implementation is proceeding with respect to a Construction Environmental Management Plan (CEMP) (which incorporates the relevant approval conditions).
Construction	The demolition and removal of buildings or works, the carrying out of works for the purpose of the development, including bulk earthworks, and erection of buildings and other infrastructure permitted by the Development Consent
Council	Eurobodalla Shire Council
Development	The development described in the Eurobodalla Southern Water Supply Storage Environmental Impact Statement
Development Consent (DC)	The Minister for Planning's approval SSD 7089 dated 17 October 2019
Development Consent Conditions	The Minister for Planning's Minister's Development Consent Conditions contained in approval SSD 7089 dated 17 October 2019
DPE	Department of Planning and Environment
EIS	The Environmental Impact Statement titled Eurobodalla Southern Water Supply Storage Environmental Impact Statement, prepared by SMEC dated 27/08/2018
EEC	Endangered Ecological Community
Ecologically sustainable development	Using, conserving and enhancing the community's resources so that the ecological processes on which life depends are maintained and the total quality of life now and in the future, can be increased (Council of Australian Governments, 1992)
EPA	NSW Environment Protection Authority
EMS	Environmental Management System
Environmental aspect	Defined by AS/NZS ISO 14001:2015 as an element of an organisation's activities, products or services that can interact with the environment.
Environmental impact	Defined by AS/NZS ISO 14001:2015 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
Environmental incident	An unexpected event that has, or has the potential to, cause harm to the environment and requires some action to minimise the impact or restore the environment.
EMM	Environmental Management Measure as outlined in the project EIS documentation.

Environmental objective	Defined by AS/NZS ISO 14001:2015 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.
Environmental policy	Statement by an organisation of its intention and principles for environmental performance.
Environmental target	Defined by AS/NZS ISO 14001:2015 as a detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
EPL	Environment Protection Licence
ESCP	Erosion and Sediment Control Plan
EWMS	Environmental work method statement
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not cause a non-compliance
Material harm	Is harm that: a) Involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial or b) Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such 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).
Minister, the	Minister of the NSW Department of Planning and Environment (or delegate)
Non-compliance	An occurrence, set of circumstances or development that is a breach of the Development consent
Non-conformance	Failure to conform to the requirements of Project system documentation including this CEMP or supporting documentation.
OEH	Office of Environment and Heritage
Operation	The operation of the water storage and associated infrastructure upon completion of construction excluding pre-commissioning activities
PESCP	Progressive Erosion and Sediment Control Plan
PIRMP	Pollution Incident Response Management Plan
Principal, the	Eurobodalla Shire Council
POEO Act	<i>Protection of the Environment Operations Act 1997</i> (NSW)
Project, the	Eurobodalla Southern Water Supply Storage
REMM	Revised Environmental Management Measures identified in Appendix 2 of the Development Consent
ROL	Road occupancy licence

SAP	Sensitive Area Plan
SEAR's	Secretary's Environmental Assessment Requirements
Site	Part of Lot 3 DP438839 and Lot 2 DP1168581 and an unnamed lot bounded by Bullockys Hut Road and Big Rock Road, Bodalla
SPIR	Submission and Preferred Infrastructure Report
SSD	State Significant Development
TRIPs	Tuross River Intake Pump Station

Document Control and Records

Documentation and document control for this Plan, including issue of any amendments will be done generally in accordance with the contract. This Plan is maintained by Haslin Constructions (Haslin) and maintained throughout construction through regular reviews carried out on an initial 3 month of the project starting then on a biannually basis, or as changes require.

At all times an up-to-date copy of this plan shall be kept on site and made available to all employees and contractors involved in the project. Amendments that are made to this document are recorded on the register of amendments below and shall be approved by management staff. Superseded versions of this document shall be maintained for a period of 7 years to demonstrate record of environmental management and compliance.

This document shall be created and approved by the client. A controlled copy shall be supplied to all relevant parties, and distribution of controlled copies shall be recorded on the distribution register below (controlled hardcopy only). When changes are made to this document, parties listed below shall be provided with updates.

Register of Amendments				
Date:	Version No:	Description of Amendments:	Prepared by:	Approved by:
29/07/22	0	Draft for review	NF	AL
12/08/22	A	Responding to ESC feedback	NF	AL
09/09/22	B	Minor adjustments	NF	AL
18/10/22	C	Minor adjustments	NF	AL
21/10/22	D	Minor adjustments	KM	JM

Company Management Plan Authorisation			
	Name/Position	Date:	Signature
Prepared by:	Nicholas Francesconi Environmental Consultant	21/10/22	
Reviewed by:	Andrew Lynam Environmental Manager	21/10/22	
Approved by:	Colin Woods Managing Director	21/10/22	

Distribution Register	
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Version No.	Date of Issue:	Name of Recipient:	Position/Organisation
A	22/08/22	Ross Bailey	Principals Authorised Person
B	14/09/22	Ross Bailey	Principals Authorised Person
C	18/10/22	Ross Bailey	Principals Authorised Person
D	21/10/22	Ross Bailey	Principals Authorised Person

1. Introduction

1.1 Purpose of this CEMP

This Construction Environmental Management Plan (CEMP) is the overarching document in the environmental management system for the Eurobodalla Southern Water Supply Storage project that includes a number of management documents. It is applicable to all staff and sub-contractors associated with the construction of the Project.

This Construction Environmental Management Plan (CEMP) and sub plans (hereafter referred to as plans) have been prepared to outline and describe how Haslin Constructions will comply with the NSW Minister for Planning's Development Consent (DC) during the construction of the Eurobodalla Southern Water Supply Storage project.

It outlines how Haslin Constructions will minimise the environmental risks and achieve environmental outcomes on the project by providing a structured approach to ensure appropriate controls are implemented.

Implementing the CEMP and plans effectively will ensure that the Project meets the requirements of the Minister's Development Consent, the statement of commitments made in the Environmental Impact Statement and all licences/approvals.

The CEMP has been prepared in accordance with:

- The Project approval SSD 7089.
- The requirements of the relevant EMP guidance as specified by the Department of Planning and Environment.
- AS/NZS ISO 14001.
- Haslin Constructions Environmental and Sustainability Policy (SEQ-POL-002).
- The project contract requirements.

This CEMP:

- Describes the construction activities to be undertaken and their timing
- Identifies the planning approval requirements, legal obligations, permits, licences, standards and guidelines that construction 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 the Development Consent and where they are met in this CEMP are shown in Table 1-1, agency consultation requirements for each plan are outlined in Table 2-1.

Table 1-1 Development consent requirements for CEMP

Condition No.	Requirement	Where addressed
C1	Management 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.	Appendix B1, B2, B3, B4, B5, B6, B7.
C2	The applicant must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of C1	This document

Condition No.	Requirement	Where addressed
C3	As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following: • Traffic Management Plan • Flora and Fauna Management Plan • Noise and Vibration Management Plan • Soil and Water Management Plan • Emergency Response Procedures in the event of flooding and bushfire	• Appendix B1 • Appendix B2 • Appendix B3 • Appendix B4

1.2 The Eurobodalla Southern Water Supply Storage project

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.

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.

The Eurobodalla Southern Water Supply Storage was approved by the Department of Planning and Environment (DPE) on 17 October 2019.

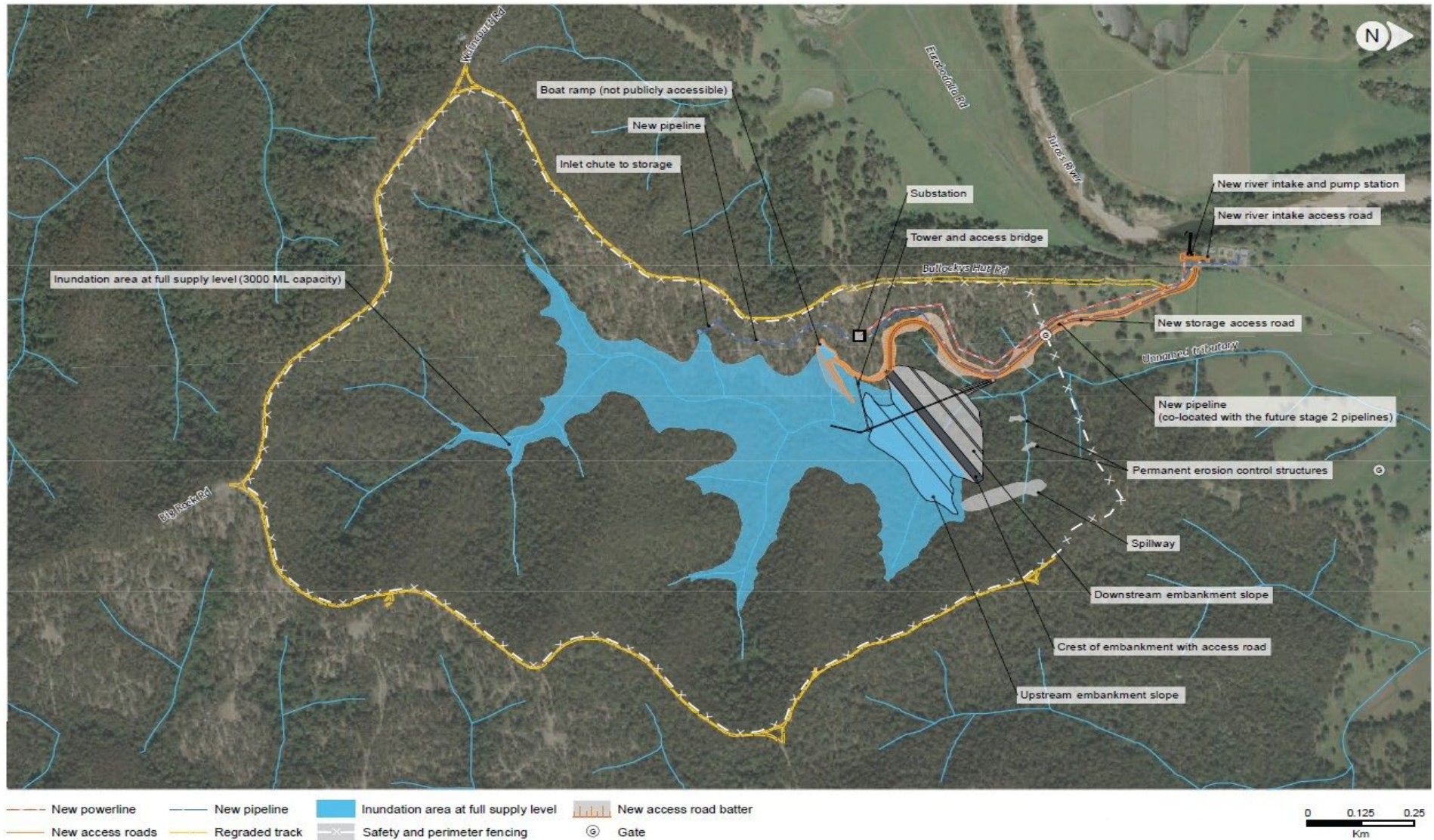


Figure 1.1 Eurobodalla Southern Water Supply Storage project overview

1.3 Scope of the CEMP

With the approval of the Secretary of Planning, construction of the Eurobodalla Southern Water Supply Storage project is being constructed in the following stages:

- Stage 1: Tuross River Intake Pump Station clearing.
- Stage 2: Tuross River Intake Pump Station construction.
- Stage 3: Vegetation clearing and topsoil stripping of the access road, intersection works, construction of the access road and inlet pipeline to the forestry boundary.
- Stage 4: Partial clearing of the entire storage site.
- Stage 5: All other works.

Works in Stage 1, Stage 2 and Stage 4 are complete. Stage 3 works are partially complete and will continue to be delivered under the applicable CEMP. This Plan only applies to Stage 5 of the approved project, being the construction of all remaining works on site including the removal of the remaining vegetation within clearing boundary, construction of the embankment wall, spillway, permanent erosion control measures and all remaining works on site to enable the project to become operational. The scope of works is detailed in Figure 1.1 and the construction site boundary is detailed in Figure 1.2.

1.4 Environmental Management System Overview

The Environmental Management System (EMS) is an integrated set of tools and resources that define how the project will manage environmental risks at all levels of the business. Haslin Constructions operates an environmental system compliant with AS/NZS ISO 14001.

This CEMP is part of the project EMS and describes how Haslin Constructions will manage environmental issues during the construction of the project. The structure of the project EMS, the structure of the CEMP and the related plans and procedures are summarised in Figure 1.3.

This CEMP shall be updated as necessary to ensure all components of the works construction are covered.

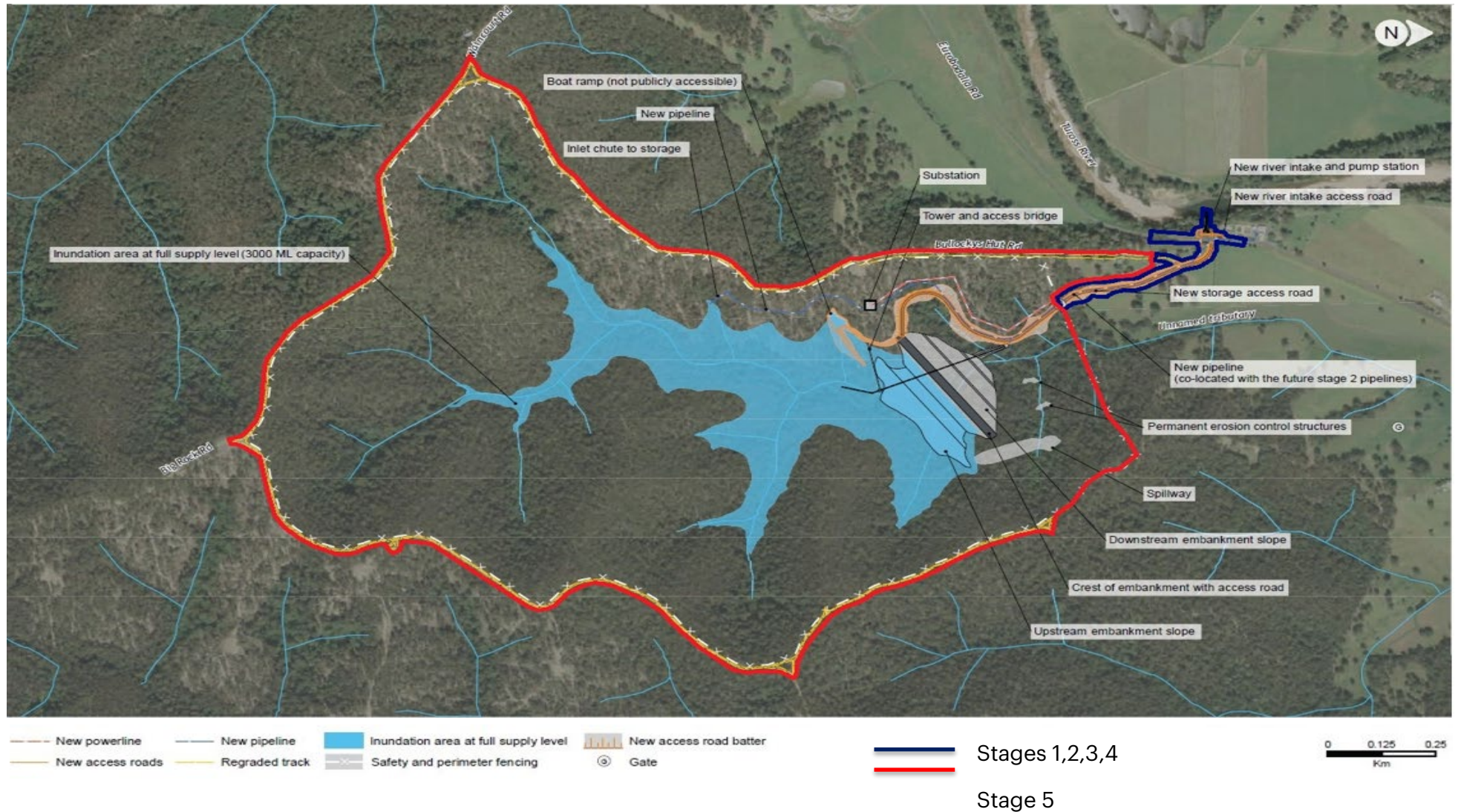


Figure 1.2 Scope of works covered by this plan (Stage 5)

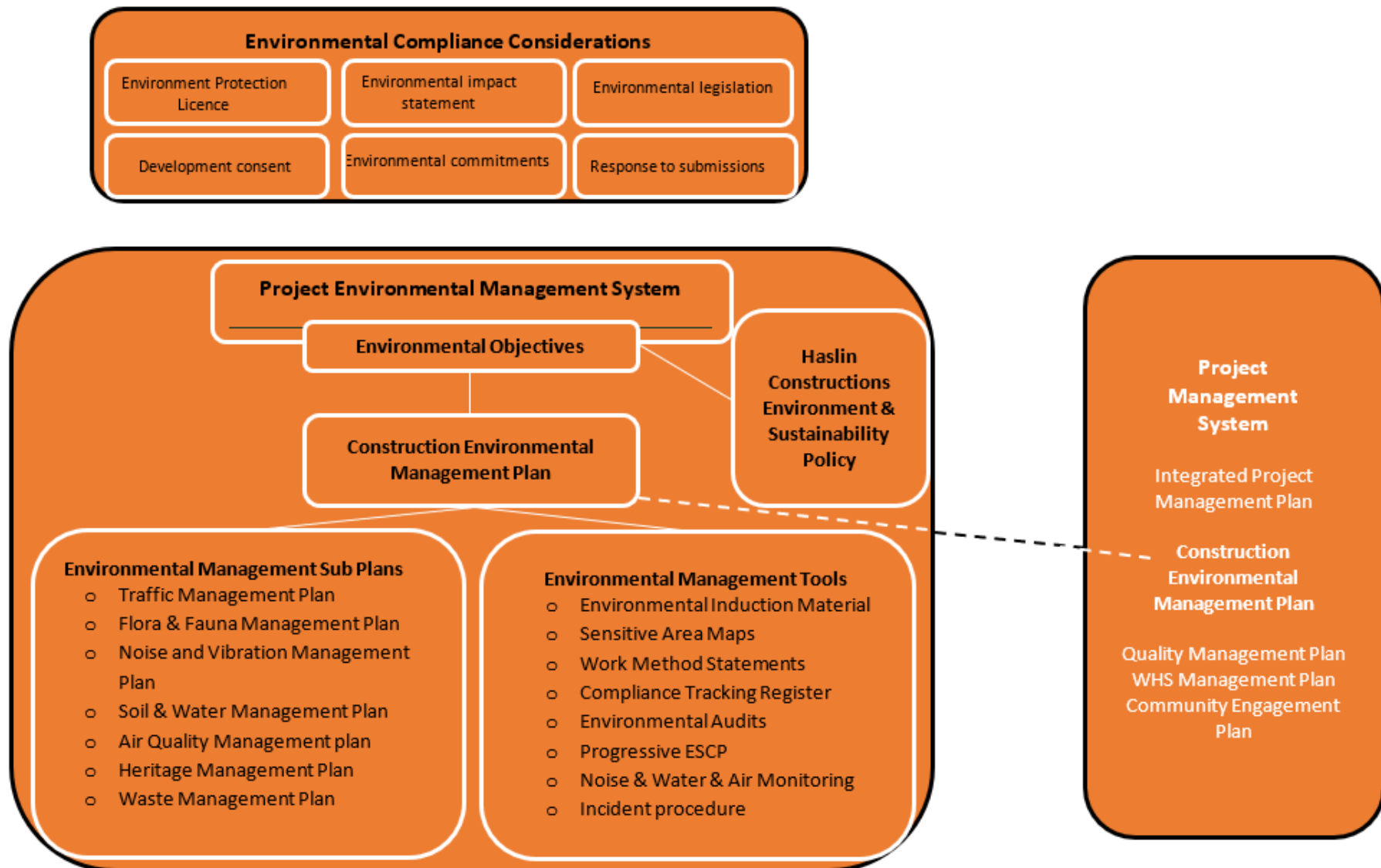


Figure 1.3 Eurobodalla Southern Water Supply Storage EMS

2. Consultation, endorsement and approval

This CEMP and the associated plans were developed after detailed review of documentation by environment staff and construction managers. Relevant plans were reviewed by subject matter experts prior to being reviewed and approved by the Haslin Construction Senior Project Manager. The CEMP plans will be submitted to Eurobodalla Shire Council.

As part of the preparation of this CEMP and the plans, consultation with the government agencies identified in Table 2-1 has been undertaken.

Table 2-1 CEMP and plan consultation

SSD-7089 Consent Condition	Plan	Agency Consultation	Approval
REMM 1.3	CEMP	DPI Fisheries	-
B3	Flora and Fauna Management Plan	DPI Fisheries	Planning Secretary
B13	Soil and Water Management Plan Erosion and Sediment Control Plan	EPA DPI Fisheries & NRAR	-

Evidence of agency consultation required by Development Consent B3 and B13 are provided in Appendix A5 of this CEMP.

3. Environmental Management Plan

3.1 Preparation and availability of the CEMP

This CEMP has been prepared in accordance with the 'Environmental Management Plan Guideline: Guideline for Infrastructure Projects' (DPIE 2020) and Haslin Constructions Environment and Sustainability Policy (SEQ-POL-002). It incorporates all requirements of the EIS documentation and all applicable approvals for the project.

Haslin Constructions Environment and Sustainability Policy is displayed on their [website](#), at the site office and communicated to staff and other interested parties via inductions and ongoing awareness programs. A copy of the Policy is presented below.

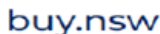
Haslin Environmental and Sustainability Policy



HASLIN
Civil Engineering + Infrastructure



NSW
GOVERNMENT



buy.nsw



AS/NZS 9001:2015
CERTIFIED



ISO 14001:2015
CERTIFIED

Environmental & Sustainability Policy

SEQ-POL-002

Haslin Constructions Pty Ltd is fully aware of the impact of its business operations on the environment, its responsibilities towards the protection of the environment and the creation of better social and economic conditions for our present and future generations. Haslin management are committed to:

- Conducting business operations in an environmentally sensible manner with full regards to the sensitivities of the local and regional environment, enhancing the built and cultural heritage in the communities we work.
- Complying with all applicable environmental legislation, standards, guidelines and statutory policies
- Taking all practicable initiatives to minimise pollution of the environment
- Considering whole of life environmental, social and economic aspects throughout project design, procurement and construction
- Applying best practice environmental solutions to the design and construction of building and infrastructure and supporting the principles of Ecologically Sustainable Development
- Managing resources and waste efficiently identifying opportunities to reduce our environmental footprint, minimize and recycle waste, and use recycled and low impact materials, minimizing risks in our supply chain
- Delivering infrastructure that is resilient to a changing climate, working collaboratively with clients and stakeholders
- Developing, implementing and maintaining an Environmental Management System incorporating specific objectives, measurable targets, programs and procedures considering whole of life considerations for continual improvement of our environmental and sustainability performance
- Monitoring performance against project specific environmental and sustainability objectives, programs, and procedures to identify opportunities for reward or improvement
- Providing appropriate training and instruction to employees and sub-contractors enhancing their environmental and sustainability awareness and skills
- Establishing and maintaining appropriate mechanisms for communication and consultation of relevant environmental and sustainability issues with employees, clients and stakeholders
- Creating better living conditions for future generations by enhancing environmental and social outcomes and leaving a net positive legacy
- Promoting a diverse and inclusive workforce
- Providing social benefits to the communities we work in by supporting local jobs, businesses and suppliers.

This Environmental and Sustainability Policy will be communicated to all employees, contractors and stakeholders and made available to company clients and the public.

Colin Woods
Managing Director



1/07/2022

3.2 Planning

3.2.1 Environmental Risk Assessment Workshop

An environmental risk assessment workshop will be held before the main projects works commence. A preliminary desktop risk assessment has been provided in Appendix A2.

The environmental risk assessment workshop will involve the Senior Project Manager, Site Manager and the Environmental Site Representative. All activities will be assessed to identify the relevant steps in the activity and the associated environmental hazards, initial risk levels, mitigation measures and to avoid, manage and/or minimise the risks and residual risks. Each of these items will be documented in an environmental risk register. Where residual risk is assessed as high an Environmental Work Method Statement will be developed for that activity.

Where relevant, the requirements from the Principal, Development Consent and Environmental Management Measures (EMMS) will be incorporated into the environmental risk assessment, particularly in developing the agreed activity specific site controls. The risk assessment contains a list of environmental aspects and impacts including those identified in the risk assessment workshop.

3.2.2 Regulatory requirements and compliance

Legislation

A register of legal and other requirements for the Project is contained in Appendix A1. This register is maintained as a checklist. The register will be reviewed prior to the commencing construction and at least annually as part of the management review. Any changes made to the legal requirements register will be communicated to the wider project team, including subcontractors where necessary through toolbox talks, specific training and other methods detailed in Section 3.4 of this CEMP.

Approvals, permits and licences

A number of approvals, permits and licenses have and/or will be obtained for the project. Appendix A1 contains a register of relevant environmental approvals, permits and licenses. The register will be reviewed prior to the commencing construction and at least annually as part of the management review. Any changes will be communicated to the wider project team, including subcontractors where necessary through toolbox talks, specific training and other methods detailed in Section 3.4 of this CEMP.

Table 3-1 Anticipated approval and licence requirements

Approval/Permit/Licence	Regulatory Authority	Timing	Status
Development consent under the EP&A Act	Department of Planning	Prior to commencing works	Approved 17/10/2019
Environment Protection Licence	EPA	Prior to undertaking activities listed in Schedule 1 of the POEO Act 1997	TBC
Road Occupancy Licences	Roads authority (Eurobodalla Shire Council)	Prior to undertaking works that are likely to impact traffic flow	As required

3.2.3 Environmental objectives and targets

As a means of assessing environmental performance during construction of the Project, environmental objectives and targets have been established. These objectives and targets have been developed with consideration of key performance outcomes for each key issue, as specified in the project Development Consent/EMM. The objectives and targets are consistent with the Haslin's Environmental and Sustainability Policy (section 3.1) policy and will assist in monitoring whether the commitments of the policy are being met.

The performance of the Project will be monitored against the objectives and targets. Project performance monitoring will be documented in the Project construction compliance reports and at least on an annual basis as part of the management review.

Environmental objectives and targets for the Project are incorporated into relevant environmental management plans and a summary is provided in Table 3-2 below.

Table 3-2 Project environmental objectives and targets

Objectives	Targets
Construction of the Project in accordance with all environmental approvals and Principal requirements	Full compliance with statutory approvals and Principal Requirements
Compliance with all legal requirements	No regulatory infringements (Penalty Infringement Notices or prosecutions)
Implementation of a comprehensive EMS that meets the requirements of AS/NZS ISO 14001	Address non-conformances and corrective actions within specific timeframes

Objectives	Targets
Engage with the affected community, minimise avoidable complaints and respond to any complaints within a suitable timeframe	Disseminate project information prior to commencing construction and updates throughout construction Record and respond to complaints within the timeframe specified
Continuously improve environmental performance	Develop and maintain a program of relevant environmental training. Capture lessons learnt from environmental incidents to minimise repeat issues. Encourage and reward innovation and effort throughout the works force
Maximise achievement of ecologically sustainable development outcomes in construction	Identify opportunities to minimise environmental impacts and minimise resource consumption

3.2.4 Environmental Work Method Statement

Environmental work method statements (EWMS) will be prepared to manage and control all high risk activities that have the potential to negatively impact on the environment. EWMS are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions. EWMS will incorporate mitigation measures and controls, including those from relevant management plans. EWMS will be prepared for high-risk activities outlined in the EIS and those identified through the Environmental Risk Assessment Workshop (see section 3.2.1. above).

EWMS will be prepared progressively in the lead up to and throughout construction in consultation with relevant members from the Project team.

The EWMS will include at least the following elements:

- Description of the work activity, including any plant and equipment to be used
- Outline of the sequence of tasks for the activity, including interfaces with other construction activities
- Identification of any environmental and/or socially sensitive areas, sites or places
- Identification of potential environmental risks/impacts due to the work activity
- Mitigation measures to reduce the identified environmental risk, including assigned responsibilities to site management personnel
- Process for assessing the performance of the implemented mitigation measures.

All construction personnel and sub-contractors undertaking a task governed by an EWMS must read and understand their obligations by signing an attendance record prior to commencing work.

Regular monitoring, inspections and auditing of compliance with the EWMS will be undertaken by Project management and environmental personnel to ensure that all controls are being followed and that any non-conformances are recorded and corrective actions implemented.

3.2.5 Sensitive Area Plans

The project works traverses a range of environmental sensitive areas. To assist with construction planning and management, these site constraints are consolidated on a series of map-based sheets called Sensitive Area Plans (SAP).

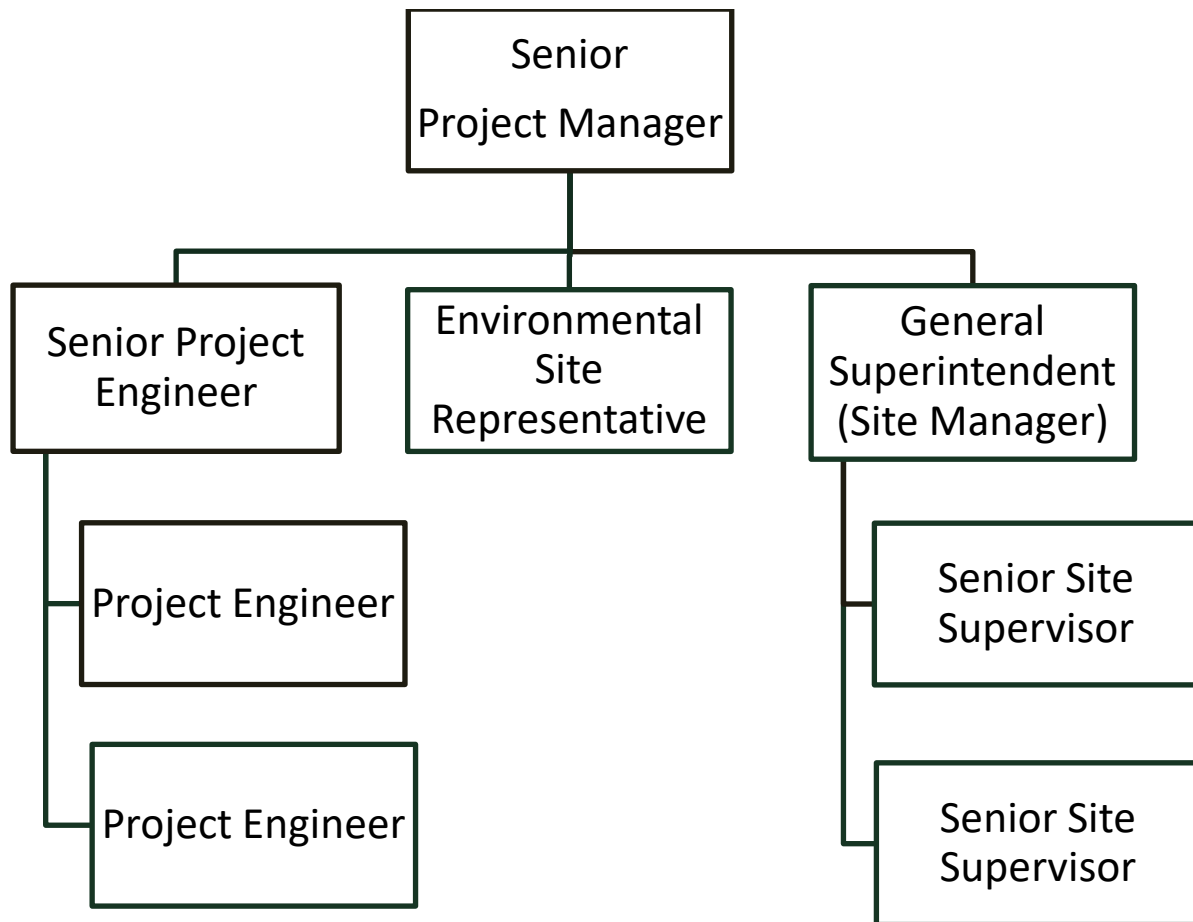
The SAP include information pertaining, but not limited to:

- Noise sensitive receivers (e.g. residential dwellings,)
- Flora features, including threatened species and endangered ecological communities Potential Aboriginal sites

The SAP will be used in conjunction with EWMS to help identify key risk areas and to promote ongoing communication to construction personnel during the Project. As part of this CEMP, a SAP has been developed for the site. As SAP are a working element of the CEMP, it will be regularly reviewed throughout construction to reflect true ground conditions and identify new environmentally sensitive areas. As part of the environmental induction, all staff and subcontractors working on site will be provided with an understanding of the risks associated with working in or near environmentally sensitive areas.

3.3 Resources, responsibilities and authority

The key environmental management roles and responsibilities for the construction phase of the Project are described below.

**Figure 3.1** Project management structure**Table 3-3** Roles and responsibilities of project staff in relation to environment matters

Role	Responsibility
Senior Project Manager	Be an emergency contact and available to be contacted by EPA, DPE and Eurobodalla Shire Council on a 24-hour basis Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of this CEMP Plan and execute works in compliance with this CEMP, Project requirements and regulatory requirements Ensure the requirements of this CEMP are fully implemented and that environmental requirements are integrated with other construction requirements Assist in the implementation of Haslin Constructions Environment and Sustainability Policy (SEQ-POL-002)

Role	Responsibility
	Lead input into the preparation of environmental planning documents as required Issue instructions and provide adequate information to employees that relate to environmental risks on-site Stop work immediately if an unacceptable impact on the environment has or is likely to occur. Lead measures to minimise environmental risks Ensure that complaints are investigated to ensure effective resolution Key emergency response person during an environmental site emergency Take action in the event of an emergency and allocate the required resources to minimise the environmental impact
Senior Project Engineer	Provide input into the preparation of environmental planning documents as required Ensure that the works are carried out in accordance with the requirements of the CEMP and supporting documentation, including the implementation of all environmental controls Stop work immediately if an unacceptable impact on the environment has or is likely to occur. Take action in the event of an emergency and assist in the allocation of resources to minimise the environmental impact Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Senior Project Manager and Environmental Site Representative.
Project Engineer	Provide input into the preparation of environmental planning documents as required Implement works in accordance with the requirements of the CEMP and supporting documentation, including all environmental controls Stop work immediately if an unacceptable impact on the environment has or is likely to occur

Role	Responsibility
	Take action in the event of an emergency to minimise the environmental impact Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Senior Project Manager and Environmental Site Representative.
General Superintendent (Site Manager)	Communicate with all personnel and sub-contractors regarding compliance with the CEMP and site-specific environmental issues Ensure all site workers attend an environmental induction prior to the commencement of works Co-ordinate the implementation of the CEMP Coordinate the implementation of close out of actions from internal environmental inspections Co-ordinate the implementation and maintenance of pollution control measures Identify resources required for implementation of the CEMP Support the Environmental Site Representative in achieving environmental objectives, including on ground implementation of the EWMS and PESCP Stop work immediately if an unacceptable impact on the environment has or is likely to occur. Take action in the event of an emergency and assist in the coordination of resources to minimise the environmental impact Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Senior Project Manager and Environmental Site Representative.
Senior Site Supervisor	Undertake any environmental duties as defined by the General Superintendent (Site Manager) or Environmental Site Representative Control field works and implement/maintain effective environmental controls Where required, undertake environmental risk assessment of works prior to commencement

Role	Responsibility
	Ensure site activities comply with EWMS and relevant records are kept Ensure all site workers are site inducted prior to commencement of works Attend to any spills or environmental incidents that may occur on-site Stop work immediately if an unacceptable impact on the environment has or is likely to occur. Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Senior Project Manager and Environmental Site Representative.
Environmental Site Representative	Be accountable for the implementation of the CEMP and plans on the Project. Be an emergency contact and available to be contacted by EPA, Department of Planning or Eurobodalla Shire Council on a 24-hour basis Act as the main point of contact for the approval authorities Implementation, monitoring and updating of the CEMP and plans in accordance with ISO14001 Oversee environmental complaint investigation responses Facilitating site inspections and close out of actions identified during site visits Review subcontractors' performance and compliance with Haslin constructions environmental requirements, including assessing their environmental capabilities and overseeing the submission of their environmental documents Ensure regular inspections, observations, monitoring and audits are conducted to check the effectiveness of controls and that compliance is maintained Identify, assess and leverage opportunities to achieve positive environmental outcomes Report to the Haslin Constructions Senior Project Manager on the performance and implementation of the CEMP

Role	Responsibility
	Stop work immediately if an unacceptable impact on the environment has or is likely to occur. Key emergency response person during an environmental site emergency Take action in the event of an emergency and assist in the coordination of actions to minimise the environmental impact
Wider project team (including subcontractors)	The environmental responsibilities of the wider project team (including subcontractors) include (but are not limited to) the following: • Comply with the relevant requirements of the CEMP, or other environmental management guidance as instructed by a member of the project's management • Participate in the mandatory project/site induction program • Report any environmental incidents to the Senior Project Manager and Environmental Site Representative immediately or as soon as practicable if reasonable steps can be adopted to control the incident • Stop activities where there is an actual or immediate risk of harm to the environment and advise the Senior Project Manager and Environmental Site Representative.

3.4 Selection and management of subcontractors

All subcontractors are required to work in accordance with this CEMP.

Environmental requirements and responsibilities will be specified to subcontractors in the contract documentation. As part of the selection process, consideration will also to be given to their past environmental performance.

Haslin Constructions will ensure that all subcontractors selected to work on the project understand and have the capability to comply with their environmental management responsibilities. All sub-contractors are required to attend Project and/or site inductions where the requirements and obligations of the CEMP will be communicated.

High risk work to be performed by subcontractors will be reviewed by the Environmental Site Representative to determine whether it includes works for which Project planning and environmental risk assessments have been performed. If so, the subcontractor is formally informed of all relevant risks and existing Project documents,

systems and procedures to be followed prior to commencing works (having been informed of these during the tendering process). These may include the contents of the construction methodology and environmental plans in this CEMP.

If the scope of works includes activities not already adequately addressed in Project planning and risk assessment, then an appropriate risk assessment will be performed. Following this, existing documentation will either be revised, or new documentation will be produced.

Subcontractors are responsible for:

- Environmental requirements and responsibilities which are specified in their contract documentation
- Work in accordance with this CEMP, plans and procedure
- Attend inductions, toolbox meeting and other meetings as required where the requirements and obligations of the CEMP, -plans and procedures are communicated
- Reporting environmental incidents to their contact within the project (Site Manager and Environmental Site Representative) immediately
- Participating in investigation and/or risk assessments where necessary

3.5 Competence, training and awareness

To ensure that this CEMP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this CEMP. The Environmental Site Representative will coordinate the environmental training in conjunction with other training and development activities (eg safety).

3.5.1 Environmental induction

All personnel (including sub-contractors) are required to attend a compulsory site induction that includes an environmental component prior to commencement on-site. This is done to ensure all personnel involved in the Project are aware of the requirements of the CEMP and to ensure the implementation of EMS.

Short-term visitors to site undertaking inspections / entering the site (such as regulators) will be required to undertake a visitors induction and be accompanied by inducted personnel at all times.

The Environmental Site Representative (or delegate) will conduct the environmental component of the site inductions.

The environmental component of the induction will cover all elements of the CEMP and would include as a minimum:

- Relevant details of the CEMP including purpose and objectives
- Requirements of due diligence and duty of care
- Conditions of environmental licences, permits and approvals
- Potential environmental emergencies on Site and the 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
- Weed management
- Fire management and prevention
- Flora and Fauna considerations and control measures
- Traffic Management including speed limits and allowable areas to park or access
- Cultural Heritage
- Unexpected finds procedure

A record of all environment inductions will be maintained and kept on-site. The Environmental Site Representative may authorise amendments to the induction at any time. Possible reasons for changes to the induction may be Project modifications, legislative changes or amendments to this CEMP or related documentation.

3.5.2 Toolbox talks, training and awareness

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all aspects of construction including environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction.

Toolbox talks will include details of EWMSs for relevant personnel. Toolbox talks will also be tailored to specific environmental issues relevant to upcoming works.

- Relevant environmental issues include (but are not limited to):
- Threatened species, endangered ecological communities, clearing controls and vegetation protection
- Erosion and sedimentation control
- Dewatering
- Hours of work
- Emergency and spill response
- Aboriginal heritage
- Weed management

- Dust control
- Traffic Management

Toolbox talk attendance is mandatory and attendees of toolbox talks are required to sign an attendance form and the records maintained. Targeted environmental awareness training will be provided to individuals or groups of workers with a specific accountability, authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. Topics covered may include those detailed above, or others deemed necessary in the lead up to or during construction.

Another way to inform construction personnel will be through the development and distribution of awareness notes. These will typically take the form of a poster, booklet, or similar and will be distributed to engineers, leading hands and others with a responsibility for managing specific work locations or activities. This documentation will be used to inform the broader workforce through either daily pre-starts meeting or provision in worker crib sheds / break facilities.

3.5.3 Daily Pre-Start Meetings

The pre-start meeting is a tool for informing the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

The General Superintendent (or their delegate) will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Daily pre-start meetings are generally succinct in nature and take approximately 10-15 minutes.

The environmental component of pre-starts will be determined by either the General Superintendent, Environmental Site Representative, or Senior Site Supervisors and will include any environmental issues that could potentially be impacted by, or impact on, the day's activities. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained

3.6 Working hours

The approved working hours on this project are identified in Development Consent B31.

Activity	Day	Time
Earthworks and construction (other than blasting)	Monday – Friday	7:00am to 6:00pm
	Saturday	8:00am to 1:00pm
	Not permitted on public holidays	-

Activity	Day	Time
Blasting	Monday – Friday	9:00am to 3:00pm
	Not permitted on public holidays	-

Development Consent B32 allows works to be undertaken outside of the above identified hours **only** in the following circumstances:

- Works are inaudible at the nearest sensitive receivers; or
- For the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
- Where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm; or
- Where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justified is provide for the works.

All out of hours works, even when compliant with Condition B32 requires the Principal's approval beforehand.

3.7 Communication

3.7.1 Internal communication

All site personnel including subcontractors will be made aware of the external and internal communications procedures and Haslin Constructions will ensure they are properly trained in their application.

Clear lines of communication throughout all levels and functions (e.g. management, staff and subcontracted service providers), are key to minimising environmental impacts and achieving continual improvements in environmental performance.

The Environmental Site Representative will regularly meet with the Project Manager, General Superintendent and Project Engineer to discuss environmental management on site, any amendments to plans that might be required or any new / changes to construction activities. The purpose of these meetings would be to communicate ongoing environmental performance and to identify any issues to be addressed.

In addition, the Environmental Site Representative (or delegate) will participate, as required, in toolbox talks, daily pre-start meetings or activity specific pre-start meetings to communicate environmental performance, management or issues with the wider construction team. This forum will provide an opportunity for the environment team members to advise on any upcoming sensitive environmental matters for future work areas and to receive feedback from on-site personnel.

Further internal communications regarding environmental issues and aspects will be through awareness training as described in Section 3.5.

3.7.2 Liaison with external stakeholders

The Senior Project Manager has the responsibility to report on the ongoing environmental performance of the Project to Eurobodalla Shire Council in accordance with the requirements outlined in Table 3-4 unless otherwise agreed by Eurobodalla Shire Council.

The Senior Project Manager and the Environmental Site Representative are 24-hour contacts. They have the authority to halt the progress of the works if necessary. They are also key emergency response personnel during an environmental site emergency.

The Environmental Site Representative is the authorised contact person for communications with the Department of Planning & Environment and the EPA on environmental matters.

3.7.3 Community liaison and complaints management

A Community and Stakeholder Engagement (CSE) plan will be prepared for the project that will include:

- Mechanisms to provide details and timing of activities to affected local residents, business and community facilities, including but not limited to changed traffic, access conditions, construction activities and noise mitigation.
- Contact name and number for making complaints.
- A complaints handling procedure and register.
- Mechanisms for reporting complaints to the Principal.

3.8 Emergency and Incident Notification

An (environmental) incident is an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. This may be as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred, is occurring, or is likely to occur.

Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items and adverse community impacts.

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

The EPA will be notified of any pollution incidents on or around the site via the EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the *Protection of the Environment Operations Act 1997* (NSW) (POEO Act) when:

- 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)

Following notification to the EPA, Haslin Constructions would immediately notify the Minister of Health, Eurobodalla Shire Council, SafeWork NSW and Fire and Rescue NSW.

Once these verbal notifications occur, DPE would be provided with written notification (via email to: compliance@planning.nsw.qov.au). The latter requirement to undertake incident reporting and notification to DPE 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 DPE immediately (but following the above verbal notifications) in the event of a potential material harm incident occurring.

3.9 Environmental non-compliance

Any member of the Project team may raise a non-compliance or improvement opportunity. Eurobodalla Shire Council or any public authority may also raise a non-compliance or improvement opportunity using the same process.

A non-compliance is defined in the Development Consent as:

an occurrence, set of circumstances or development that is in breach of this consent.

Non-complying activities will be stopped, if necessary, by the Senior Project Manager, Environmental Site Representative, Site Manager or Senior Site Engineer following consultation with the Senior Project Manager or delegate. The works will not commence until a corrective / preventative action has been closed out.

For each non-compliance identified a corrective/preventative action (or actions) must be implemented. In addition, any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, audit findings or other reviews. Improvement opportunities may also result in the implementation of corrective/preventative actions.

Corrective/preventative actions and improvement opportunities will be entered into the contractor's quality system database and include detail of the issue, action required and timing and responsibilities. The record will be updated with date of close out and any necessary notes. The database will be reviewed regularly to ensure actions are closed out as required.

Procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management are also documented in the Compliance Tracking Program (see section 3.11).

3.10 Monitoring, inspections and auditing

3.10.1 Environmental inspections

The Environmental Site Representative (or delegate) will undertake weekly site environmental inspections to assess the ongoing effectiveness and suitability of the Project's environmental controls. The site environmental inspections will cover the following:

- General environmental performance
- Compliance with the Development Consent
- High risk activities and processes
- Work in environmentally sensitive areas
- Site preparedness for adverse weather conditions, including adequacy of environmental controls and availability of emergency equipment.

Copies of all environmental inspection reports prepared by the Environmental Site Representative (or delegate) will be kept with the Project records and closed out within the agreed timeframes. These timeframes will be dependent on the nature of the required corrective action and the environmental risk associated with the outstanding action as determined by the relevant Environmental Site Representative. The outcomes of inspections will be captured on Environmental Inspection Checklists.

In general, the corrective action will concentrate on the environmental management system and its associated processes rather than on the perceived deficiencies of individual workers.

If any maintenance and/or deficiencies in environmental controls or in the standard of environmental performance are observed, they will be recorded in an environmental action list. Records will also include details of any maintenance required (environmental controls), the nature of the deficiency, any actions required and an implementation priority. The environmental action list will then be issued to the relevant leading hand for actioning.

When an observation is raised of a significant nature, and where deemed necessary by the Environmental Site Representative, an Environmental Improvement Notice (EIN) may be issued to either the Project Manager or the subcontractor supervisor in charge of the work activity and/or an individual. The engineer or individual receiving the improvement notice will be required to respond to the agreed corrective action as outlined on the notice.

The completed EIN must be reviewed and followed-up to ensure they are promptly completed. Repetitive observations that have significant hazards should be reviewed to check that a system failure is not occurring. The Environmental Site Representative will confirm close out of the EIN and report this to the Project Manager.

3.10.2 Post rainfall site inspections

The Environmental Site Representative would undertake post rainfall inspections of the work site to evaluate the effectiveness of environmental controls. Post rainfall inspections would be undertaken after more than 25mm of rain in a 24-hour period.

The Environmental Site Representative will record inspection findings on an inspection checklist form. If any maintenance and/or deficiencies in environmental controls or in the standard of environmental performance are observed, they will be recorded in an environmental action list.

3.10.3 Environmental monitoring and reporting

Monitoring will be undertaken to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this CEMP and to measure performance against the project environmental objectives (identified in 3.2.3). The monitoring requirements for required aspects are included in the relevant environmental management plans and summarised in Table 3-4 below.

Table 3-4 Environmental monitoring

Monitoring	Frequency
Site personnel environmental inductions	Monthly
Environmental incident close out	Monthly
Trial blasting monitoring	During each trial blast
Dust monitoring	Daily
Blast overpressure and vibration monitoring	During each blast
Construction noise monitoring	Quarterly of attended monitoring at nearest receivers
Traffic management (including noise)	One round of attended monitoring at nearest receivers
On-site water quality monitoring	Quarterly / When flows leave site at unnamed creekline
Off-site water quality monitoring	Quarterly / When flows leave site at unnamed creekline

The following environmental reporting will be presented to Eurobodalla Shire Council for the duration of the project, unless otherwise agreed to by Council.

Table 3-5 Environmental reporting requirements to Eurobodalla Shire Council

Report	Frequency
List of inducted site personnel	The list shall be updated each time new staff arrive on-site
Environmental Management Report	Four-weekly
List of licences obtained	The list shall be updated each time a new license is obtained or renewed
Trial blasting report	Once, at the completion of each trial blast
Dust monitoring report	Four-Weekly
Blast overpressure and vibration monitoring report	Four-Weekly
Construction noise monitoring report	Four-Weekly
Traffic management (including noise) report	Four-Weekly
Water quality monitoring report	Fortnightly
Exceedance/Incident reports	Daily as incidents/exceedances occur
Outcomes of Internal (First Party) Audits	Four-Weekly
Actions taken in response to Second Party and Compliance Audits	Four-Weekly, or as audits occur
Community complaints and corrective actions	Monthly

3.10.4 Auditing

The project will be subject to a range of internal and external audits to verify compliance with the environmental objectives and regulatory requirements. The audits will include First Part (Internal audits), Second party audits and Compliance audits.

First party audits

Haslin Constructions will undertake First party audits monthly throughout the Project. The purpose of auditing is to verify compliance with the environmental criteria and to improve environmental performance.

Second Party Audits

Eurobodalla Shire Council will undertake second Party Audits of the project to ensure that Haslin Constructions are complying with the specified environmental criteria and procedures. The second party audit will cover both the implementation and documentation aspects of the Contract and be based on:

- This CEMP, plans and the environmental commitments.
- The procedures that Haslin is working under
- Accepted industry practice guidelines.

An audit checklist will be developed and amended as necessary to reflect changes to this CEMP, subsequent approvals and changes to Acts, regulations or guidelines.

Compliance audits

Auditing will also be undertaken by an independent environment auditor to Haslin in accordance with ISO 19011:2014 - Guidelines for Quality and/ or Environmental Management Systems Auditing.

The compliance audits will examine whether the project complies with appropriate environmental standards, criteria and/or legislation.

- This CEMP, plans and the environmental commitments.
- The procedures that Haslin is working under

3.11 Construction Phase Compliance tracking

A Compliance Tracking Program has been developed in accordance with the NSW Department of Planning and Environment *Compliance Reporting: Post Approval Requirements May 2020*.

The Compliance Tracking Program describes how the requirements of the Development Consent will be met and sets out a program and frequency for compliance reporting. The Compliance Tracking Program includes:

- Provisions for the notification of the Minister prior to the commencement of operation of the Project
- Provisions for periodic review of Project compliance with the requirements of this approval, EMMS and documents listed under Development Consent conditions C13 and C14.
- Provisions for periodic reporting of compliance status against the requirements of this approval, EMMS and documents listed in the Development Consent
- Mechanisms for reporting and recording incidents and actions taken in response to those incidents in accordance with Development Consent conditions C10 and C11

- Procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management.

3.12 Records of environmental activities

Environmental records

The construction Environmental Site Representative (or delegate) is responsible for maintaining all environmental management documents and records as current at the point of use. Types of documents and records include:

- All monitoring, inspection and compliance reports/records
- Correspondence with public authorities
- Induction and training records
- Reports on environmental incidents, other environmental non-conformances, complaints and follow-up action
- Community engagement information
- Minutes of CEMP and construction environmental management system review meetings and evidence of any action taken
- CEMP and plans
- EWMS

All environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements.

Only the Environmental Site Representative, or delegate, has the authority to change any of the environmental management documentation.

Document control

Haslin Constructions will coordinate the preparation, review and distribution, as appropriate, of the environmental documents and records listed above. During the Project, the environmental documents and records will be stored at the main site compound.

The Contractor will implement a document control procedure to control the flow of documents within and between Transport for NSW, stakeholders and subcontractors.

The procedure will also ensure that documentation is:

- Developed, reviewed and approved prior to issue
- Issued for use
- Controlled and stored for the legally required timeframe

- Removed from use when superseded or obsolete
- Archived

3.13 Management review

Management reviews of the Project's EMS will be undertaken as part of the continual improvement process. The purpose of the reviews is to periodically examine the effectiveness and proper implementation of the CEMP to ensure that the system is meeting the requirements of the standards, policies and objectives and, if not, to amend the CEMP to ensure compliance.

The Environmental Site Representative will review the CEMP and its operation and implementation at least every six months from construction commencement. Between the scheduled reviews, a register of issues will be maintained to ensure that any issue raised by internal and external personnel associated with the Project is recorded.

This review will be held at least every six months and will consider:

- Opportunities to improve documentation, processes and practices
- Reviewing key environmental risks
- Client and agency feedback
- Non-conformances and deficiencies, including those identified in environment inspections and audits
- An analysis and verification of the effectiveness of corrective and preventative actions
- Changes or developments in the Haslin Constructions EMS
- Highlighting any changes in procedures resulting from process improvement.
- Complaints
- Effectiveness of environmental management documentation implementation
- Adequacy of resources
- Environmental objectives and targets including sustainability performance
- Compliance with legal and other requirements
- Organisation changes
- Effectiveness of training and inductions.

3.14 CEMP / Plan revision and changes to the Project

CEMP Revision

Continual improvement is achieved through regular measurement, evaluation, audit and review of the effectiveness of the CEMP, Project environmental outcomes and Haslin Constructions EMS. A review process ensures that environmental documentation is updated as appropriate for the specific works that are occurring on site. Reviews undertaken as described in Section 3.12 will provide specific opportunities to identify improvements in the environmental management system and/or this CEMP.

This CEMP, CEMP plans and Monitoring Programs will be updated as required:

- To take into account changes to the environment or generally accepted environmental management practices, new risks to the environment, any hazardous substances, contamination or changes in law
- In response to internal or external audits or six monthly management reviews.
- Following reportable environmental incidents
- Upon identification of new risks, including risks identified during risk register updates
- When non-compliances are identified
- Following environmental audits that identify matters that require attention
- In response to Project change (including modifications)
- Within three months of any of the above occurrences
- As part of a continuous improvement process

Changes to the Project

Refinements to the Project may result from detailed design refinements or changed circumstances throughout construction. In these instances, Haslin Constructions Environmental Site Representative will undertake a review of the refinement to confirm that it is covered by the EIS.

It may be the case that a consistency assessment in consultation with Eurobodalla Shire Council will need to be undertaken to determine if a Project modification may be required following design changes or changes in scope.

If required, the CEMP and plans would be updated as required to incorporate any additional potential environmental impacts or mitigation or management measures that resulted from the proposed changes. Affected personnel will be made aware of changes before the relevant works commence through toolbox talks, daily pre-start meetings, or forums arranged to specifically address changes.

Should the consistency assessment determine that a Project modification may be required (i.e. the impacts are of a nature and scale that it is not considered consistent

with the Project approval), a modification application under the *EP&A Act 1979* would be lodged with the Secretary DPE for determination.

4. Construction control

As outlined in Section 1.4, Haslin Constructions will follow a project Environmental Management System that consists of this CEMP, a number of plans and environmental management tools throughout construction to manage environmental risk, ensure environmental compliance and drive environmental performance.

4.1 CEMP Plans

A number of environmental management plans support this CEMP. These documents are prepared to identify requirements and processes applicable to specific impacts or to address requirements of the Development Consent, REMMS and other measures identified in the environment assessment documentation.

Environmental strategies may also be developed as required throughout the Project. These will also guide environmental management of potential impacts on-site.

A list of construction plans for the Project, and their location are provided in Table 4-1.

Table 4-1 Construction environmental management plans

Document name	Location
Traffic Management Plan	Appendix B1
Flora and Fauna Management Plan	Appendix B2
Noise and Vibration Management Plan	Appendix B3
Soil and Water Management Plan	Appendix B4
Air Quality Management Plan	Appendix B5
Heritage Management Plan	Appendix B6
Waste Management Plan	Appendix B7

Traffic Management Plan

A Traffic Management Plan (TMP) has been developed to manage the traffic and transport risks from construction of the Project. The TMP is located in Appendix B1 and has been developed in accordance with B28 of the Development Consent and Technical Specification CI 1.6.3.

Flora and Fauna Management Plan

A Flora and Fauna Management Plan (FFMP) has been developed to manage the risks to biodiversity and flora and fauna from construction of the Project. The FFMP is located in Appendix B2 and has been developed in accordance with condition B4 Development Consent and Technical Specification CI 3.6.1.

Noise and Vibration Management Plan

A Noise and Vibration Management Plan (NVMP) has been developed to manage the noise and vibration risks from construction of the Project. The NVMP is located in Appendix B3 and has been developed in accordance with B34 of the Development Consent and Technical Specification Cl 3.11.

Soil and Water Management Plan

A Soil and Water Quality Management Plan (SWMP) has been prepared to manage the environmental risks to soil and water on this Project. The SWMP is located in Appendix B4 and has been developed in accordance with condition B13 of the Development Consent and Technical Specification Cl 3.7 to manage the soil and surface water risks on this Project.

Air Quality Management Plan

An Air Quality Management Plan (AQMP) has been developed to manage the environmental risks to air quality on this project. The AQMP is located in Appendix B5 and has been developed to address Cl 3.10 of the project Technical Specification.

Heritage Management Plan

A Heritage Management Plan (HMP) has been prepared to manage the environmental risks to heritage items on this project. The HMP is located in Appendix B6 and has been developed to address Cl 3.16 of the project Technical Specification.

Waste Management Plan

A Waste Management Plan (WMP) has been prepared to guide in the management of waste and protection of resources on the project. The Waste Management Plan is located in Appendix B7 and has been developed to address Cl 3.13 of the project Technical Specification.

Appendix A1

Eurobodalla Southern Water Supply Storage Project

Register of applicable legal requirements

Legislation	Requirement	Authority
Environmental Planning and Assessment Act 1979	The Project was approved on 17 October 2019 under Section 4.38 of the Environmental Planning and Assessment Act 1979. Modification of SSD-7089 would require ministerial approval under the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act).	Department of Planning and Environment
Protection of the Environment Operations Act 1997	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). 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).	EPA

	Sections 139 and 140 of the POEO Act set out offences relating to noise pollution.	
National Parks and Wildlife Act 1974	Protection of Aboriginal Objects and Places. Duty to notify Heritage NSW if an Aboriginal object is uncovered during the works.	Heritage NSW
Biosecurity Act 2015	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)
Rural Fires Act 1997	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
Contaminated Land Management Act 2017	As per Section 6 of the Contaminated Land Management Act 2017, ensure only EPA-approved VENM and ENM are brought to site, keep records of the same and provide copies to DPIE if requested.	EPA

Fisheries Management Act 1994	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
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Eurobodalla Southern Water Supply Storage project

Compliance Tracking Program

Purpose

This Compliance Tracking Program (CTP) will be used to monitor compliance with the Minister for Planning's Minister's Development Consent Conditions contained in approval SSD 7089 dated 17 October 2019.

This Compliance Tracking Program has been developed in accordance with the NSW Department of Planning and Environment *Compliance Reporting: Post Approval Requirements May 2020* and will be implemented throughout construction of the project .

Compliance Management

The environmental management system (EMS) is the primary system to manage and control the environmental aspects of the project during construction. It also provides the overall framework for the system and procedures to ensure environmental impacts are minimised and legislative requirements are fulfilled.

The project EMS is based on Haslin Constructions' EMS, which is a certified ISO14001 EMS.

The Construction Environmental Management Plan (CEMP) is the primary system to manage and control the environmental aspects of the project during construction. It also provides the overall framework for the system and procedures to ensure environmental impacts are minimised and legislative and other requirements are fulfilled.

The strategies defined in the CEMP have been developed with consideration of the Development Consent requirements, mitigation measures presented in the environmental impact statement and contract documents. The CEMP establishes the system for implementation, monitoring and continuous improvement to minimise impacts from the project on the environment.

This CTP forms part of the CEMP and will be administered by the Environmental Site Representative or delegate for the duration of the project.

Site Surveillance and Monitoring

A key component of compliance monitoring for the project will involve site surveillance and monitoring. Section 3.10.1 and 3.10.2 of the CEMP outline the weekly site environmental inspections that will be undertaken by the Environmental Site Representative (or delegate) that will identify amongst other things compliance with the CEMP (Development Consent, Contract Requirements and any licences or permits).

Auditing

In addition to the site surveillance and monitoring identified above, compliance will be determined through environmental audits (identified and described in CEMP section 3.9.4). The audit regime will include:

- First party audits by Haslin Constructions on a monthly basis
- Second Party audits by Eurobodalla Shire Council
- Compliance audits by an independent environment auditor

For Second Party Audits and Compliance audits, the below compliance table will be used where possible.

Development Consent #	Compliance Requirement	Phase	Evidence / Comments	Compliance Status*
A6	Clearing of vegetation is not permitted outside the construction boundaries shown in Appendix 1	Construction	Clearing limits/maps	Compliant

Compliance status terminology

Compliant: Sufficient evidence has been presented to demonstrate that all elements of the requirement have been complied with

Non-Compliant: A non-compliance with one or more elements of the requirement

Not-triggered: The requirement has an activation or timing trigger that has not been met when the compliance assessment has been undertaken, therefore an assessment of compliance is not relevant.

Appendix A2

Eurobodalla Southern Water Supply Storage Project

Environmental aspects and impacts register

This Environmental Aspect and Impact Register has been prepared to supplement the Environmental Risk Analysis conducted as part of the EIS. The identification of significant construction activities and associated impacts that could eventuate during construction of the Project is central to the selection of appropriate environmental safeguards.

The risk management process involved an assessment of all specific project activities/aspects in or near environmentally sensitive areas and resulted in the development of a list of environmental risks (effects and impacts) and a corresponding risk mitigation strategy and risk ranking. Each environmental risk was categorised, based on the following:

- The environmental aspect.
- Relative scale of the potential impact.
- Type of potential impact.
- Likelihood of occurrence.

The identification of risks included a review of the proposed works, the Development Consent, REMM, and review of the environmental risks identified by the EA and subsequent Submissions Report.

Likelihood and consequence

The list of activities to be carried out, including any activities undertaken by subcontractors or other suppliers, together with the actual and potential environmental impacts associated with each activity, was considered to form the basis of the risk assessment.

The following terminology was used for determining likelihood.

Likelihood	Qualitative measure of likelihood (how likely is it that this event/issue will occur after control strategies have been put in place)
Highly likely	Is expected to occur in most circumstances
Likely	Will probably occur during the life of the project
Possible	Might occur during the life of the project
Unlikely	Could occur but considered unlikely or doubtful
Rare	May occur in exceptional circumstances

The following terminology was used for determining consequence.

Consequence	Qualitative measure of consequences (what will be the consequence/result if this issue does occur rating)
Minor	Minor incident of environmental damage that can be reversed
Moderate	Isolated but substantial instances of environmental damage that could be reversed with intensive efforts
High	Substantial instances of environmental damage that could be reversed with intensive efforts
Major	Major loss of environmental amenity and real danger of continuing
Critical	Severe widespread loss of environmental amenity and irrecoverable environmental damage

Risk rating

The risk rating was determined using the likelihood and consequence rating and the below risk matrix to assess whether the environmental risk is low, medium, high or severe.

The risk rating will be used to identify and prioritise environmental management measures to mitigate the risks to an acceptable level.

Consequence

Likelihood	Minor	Moderate	High	Major	Critical
Highly likely	Medium	High	High	Severe	Severe
Likely	Low	Medium	High	High	Severe
Possible	Low	Medium	Medium	High	Severe
Unlikely	Low	Low	Medium	High	High
Rare	Low	Low	Low	Medium	High

Table 1: Aspect and impact register

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
Air quality	- General earthworks - Vegetation clearing and burning	Complaints from neighbours, including loss of amenity, dust in living areas, swimming pools	Moderate	- Induct personnel on air quality issues and safeguards. - Use water on unsealed surfaces and stockpiles. - Utilise safe dust suppressants to reduce dust generation. - Modify operations during high winds. - All trucks on public roads to cover loads.	Low	EWMS SWMP Complaints Procedure Induction
	Open excavation works	Potential adverse health effects	Low		Low	
	- Spoil handling - Stockpiling	Degradation of water quality and other aspects of the natural environment	Low		Low	
	Vehicular movements on unsealed roads	Health risks to neighbours and members of the public from release of	Low		Low	

	• Material haulage • Quarrying • Vehicle emissions • Handling of chemicals, waste and hazardous goods.	dust, gases and/or smoke		• Vehicles, equipment, machinery used and all facilities – designed, operated and maintained to control the emission of smoke, dust, odours and fumes. • All disturbed areas stabilised, revegetated and/or landscaped as soon as practicable. • Minimise tracked mud/dust on public roads. • Visual dust monitoring. • Avoid “hot-work” during total fire bans and obtain any necessary permits/exemptions	Low	
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				from the Rural Fire Service. • WorkCover licensing requirements will be complied with for the storage of hazardous substances and dangerous goods. • Appropriately stocked spill kits will be readily available at all chemical storage locations and during chemical use. • Material Safety Data Sheets (MSDSs) will be obtained, complied with and retained on site for all required chemicals.		
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Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
				Pesticide use will be in accordance with the Pesticides Act, 1999		
Biodiversity	- General earthworks - Road works - Vegetation clearing - Perimeter fencing - Open excavation works - Spoil handling - Stockpiling	Clearing outside of an approved area, including: - Accidental clearing outside of the project boundaries - Accidental clearing beyond the requirements of the Project Approval	Medium	- Induct personnel on flora and fauna issues and safeguards. - Clearing limits delineated - Preclearing checklist - Project ecologist on call - Staged clearing	Low	Induction EWMS FFMP Inspection checklist
		Injuries to fauna	Medium		Medium	

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
		Spreading weeds via personnel, plant/equipment, topsoil / mulch	Low	- Preclearing surveys of hollow bearing trees - Unexpected finds procedure - Weed management plan and hygiene protocols - Erosion and sedimentation control measures - Two stage clearing process for known habitat trees	Low	
		Introducing/spreading of Phytophthora cinnamomi	Medium		Low	
		Clearing of hollow bearing trees with nesting fauna	Medium		Medium	
		Sediment and erosion of downstream waterways	Medium		Low	
Soil and Water	- General earthworks - Road works	Uncontrolled erosion onsite leading to offsite movement of soil	High	- Induction - Environmental Work Method Statement	Medium	Induction

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
	- Vegetation clearing - Perimeter fencing - Open excavation works - Spoil handling - Stockpiling	Discharge of dirty water from site causing: - Sedimentation of downstream waterways - Impacts to downstream aquatic habitat	High	- Soil and Water Management Plan - Discharge water quality testing - Inspection checklist - Progressive erosion and sedimentation control plan - Induct personnel on soil and water risks and safeguards.	Medium	Environmental Work Method Statement Soil and Water Management Plan Inspection checklist Progressive erosion and sedimentation control plan
		Tracking of soil and mud offsite	Medium		Low	

Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
	- Concrete works - Grouting - Dewatering activities - Crushing and screening - Traffic movements to/from site	Non-compliance with site water discharge limits	Medium	- Staged clearing - Progressive erosion and sedimentation control plans - Soil conservation specialist support	Low	Dewatering plan
Noise and Vibration	- General earthworks - Road works	Complaints from neighbours, business due to loss of amenity	Medium	- Noise and vibration management plan - Compliance with the approved working hours	Low	Induction Blast Management Plan

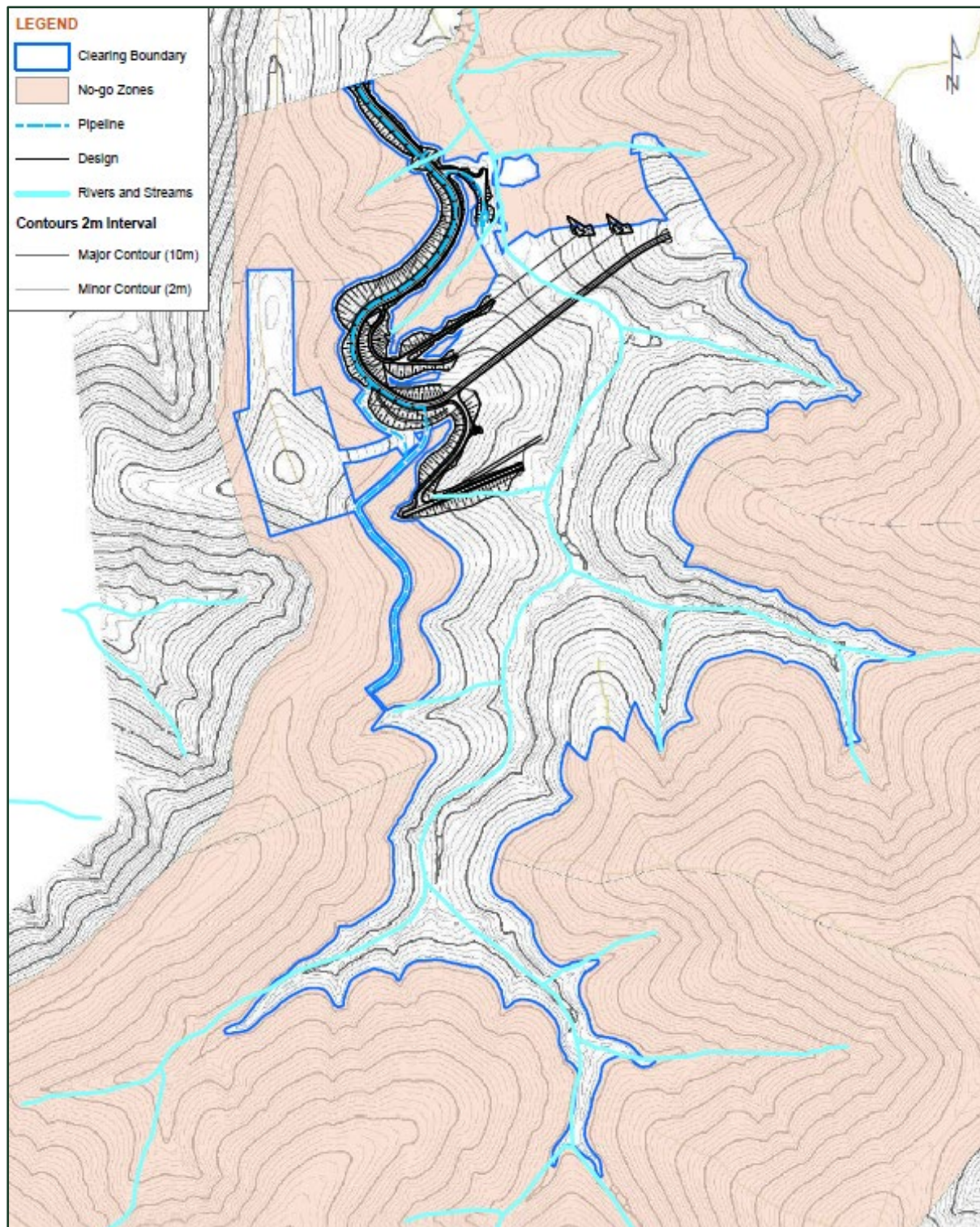
	• Vegetation clearing • Blasting • Perimeter fencing • Open excavation works (including drilling) • Spoil handling • Stockpiling • Concrete works • Crushing and screening • Traffic movements to site	Damage to private property from blasting activities	Low	• Community notification • Blast management plan • Noise monitoring	Low	Noise and vibration management plan Noise monitoring
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Issue	Construction activity/aspect	Potential impact	Risk level prior to mitigation	Indicative Mitigation Measures	Risk level following mitigation	Management Documents / Training Required
Traffic	Traffic movements to/from site	Delays or disruption to travelling public	Low	- Traffic management plan - Compliance with the approved working hours - Community notification - Detail heavy vehicle routes - Designated parking areas for site staff	Low	Induction Traffic Management plan Speed limit compliance

Appendix A3

Eurobodalla Southern Water Supply Storage Project

Sensitive area / No-go map



Appendix A4

Eurobodalla Southern Water Supply Storage Project

Environmental non-compliance and incident procedure

This Environmental Non-Compliance and Incident Procedure aims to ensure Haslin Construction workers and contractors understand how to classify, respond to and report environmental non-compliances incidents that occur on the Eurobodalla Southern Water Supply Storage project.

This procedure is applicable to events that constitute an “environmental non-compliance” and/or an “environmental incident”. These are defined in the below table.

Term	Definition
Environmental non-compliance	An exceedance of environmental limits or contractual criteria or Development Consent or Environmental Laws
Environmental Incident	An (environmental) incident is an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. This may be as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred, is occurring, or is likely to occur. Material harm is defined as an event that: iii. involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or iv. 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)

	Material Harm only relates to pollution incidents. Other environmental incidents, such as conservation, heritage and planning breaches, are not included in the definition of a pollution incident.
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Step	Action	Responsibility	Timeframe
1	Stop work in relevant area (if necessary) and take actions to prevent adverse impact to human health or the environment. Note human health and safety is the primary concern, and no action should be taken if it is not safe to do so.	Person who identifies event	Immediate
2	Advise the Haslin Senior Project Manager and Haslin Environmental Site Representative	Person who identifies event	Immediate
3	Consider whether the event constitutes an Environmental Incident	Haslin Environmental Site Representative	Immediate
4	If the event is an “incident”, notify the Haslin Authorised Representative If the event is not an incident proceed to Step 8	Haslin Environmental Site Representative	Immediate

5	Immediately after becoming aware of an Environmental Incident, notify the Principal The Principal is to provide written notification to the Department of Planning (compliance@planning.nsw.gov.au) as per the requirements of Development consent Condition C9	Haslin Authorized Representative Eurobodalla Shire Council	Immediate Immediate
6	Follow the Material Harm Notification Requirements below	Haslin Environmental Site Representative & Haslin Senior Project Manager	Immediate
7	If the event is an Environmental Incident, complete the Environment Incident Report and submit to the Principal Eurobodalla Shire Council is to provide the Department of Planning within a written incident notification compliance@planning.nsw.gov.au	Haslin Environmental Site Representative & Haslin Senior Project Manager	Within 4 days of an environmental event Within 7 days of an environmental incident
8	If the event is a non-compliance, complete the Environment – Non compliance report	Haslin Environmental Site Representative	Within 4 days of the event

10	Complete a detailed report on the incident addressing all requirements below; • a summary of the incident; • outcomes of an incident investigation, including identification of the cause of the incident; • details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and • details of any communication with other stakeholders regarding the incident. Provide the report to the Principle	Haslin Environmental Site Representative Haslin Senior Project Manager	Within 21 days of the event
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11	Eurobodalla Shire Council is to provide the Department of Planning within a detailed written report that includes • a summary of the incident; • outcomes of an incident investigation, including identification of the cause of the incident; • details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and • details of any communication with other stakeholders regarding the incident.	Eurobodalla Shire Council	Within 30 days of an environmental incident
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Material Harm Notification Requirements

Under Part 5.7 of the POEO Act, there is a duty to immediately notify (i.e. promptly and without delay) the following authorities of a pollution incident where material harm to the environment is caused or threatened.

Authorities to notify for Material Harm pollution incidents that present an immediate threat to human health or property		
Order	Authority	Contact Number
1	Fire and Rescue NSW	000

2	NSW EPA Environment Line	131 555
3	Ministry of Health Albury Public Health Unit (Murrumbidgee and Southern NSW LHD)	Business Hours 6053 4800 After hours 6053 4800 or 1300 066 055
4	SafeWork NSW	131 050
5	Eurobodalla Shire Council	4474 1000
6	Principles Representative	

Authorities to notify for Material Harm pollution incidents that do NOT present an immediate threat to human health or property

Order	Authority	Contact Number
1	NSW EPA Environment Line	131 555
2	Eurobodalla Shire Council	4474 1000
3	Ministry of Health Albury Public Health Unit (Murrumbidgee and Southern NSW LHD)	Business Hours 6053 4800 After hours 6053 4800 or 1300 066 055

4	SafeWork NSW	131 050
5	Fire and Rescue NSW	000
6	Principles Representative	

The relevant information to provide

It is important to avoid speculation on origin, causes or outcomes of a pollution incident in discussions with the authorities. Section 150 of the POEO Act provides the information that needs to be notified, being:

- a) The time, date, nature, duration and location of the incident
- b) 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, if known
- c) The circumstances in which the incident occurred (including the cause of the incident, if known)
- d) The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- e) Other information prescribed by the regulations.

Only known information should be provided when notifying of a Material Harm pollution incident. If further information becomes known after the initial notification, that information must immediately be notified to all authorities in accordance with Section 150 (see above). The immediate verbal notification is to be followed by written notification to each relevant authority within seven days of the date on which the incident occurred.

Complying with these notification requirements does not remove the need to comply with any other legislative requirements for incident notification (e.g. requirements under EPL conditions or the Work Health and Safety Act 2011).

Haslin Eurobodalla Southern Water Supply Storage Project

Environmental Non-compliance /Incident Report

Incident details		
Date and time	Date	Time.....
Description Provide a brief factual description of what happened, include relevant details such as: • the estimated distance to nearest waterway or drainage lines • the estimated distance to the nearest sensitive receiver • the activity being undertaken when the incident occurred Sketches/diagrams/photos may be referenced and appended		
Exact location of the event (include chainage, landmarks, features, nearest cross street, etc. Maps and plans can be attached to the incident report if appropriate.		
Quantity or volume of material escaped if known/applicable		
Who identified the event?		

What immediate actions/controls were taken to rectify or contain the event?		
Was it a Material Harm Incident?	Y / N	
Have the regulatory notifications taken place?	Date of notification	Reference numbers
• Fire and Rescue		
• NSW EPA		
• NSW Ministry of Health		
• NSW Department of Planning and Environment		
• SafeWorks NSW		
• Eurobodalla Shire Council		
What corrective actions have been taken to prevent a re-occurrence?		
Person making report		
Name		
Position		
Signature		
Date		

Appendix A5

Eurobodalla Southern Water Supply Storage Project

Agency consultation



23 August 2022
DOC22/739513

Mr Matthew Francesconi
General Manager- Construction
HASLIN CONSTRUCTIONS
SUTHERLAND NSW 2232

By email: nfrancesconi@strategicenvironmentalsupport.com.au

Attention: Nick Francesconi

Dear Mr Francesconi

Eurobodalla Southern Water Supply Storage Project – Eurobodalla Shire Council
Draft Soil and Water Management Plan

I refer to the draft Soil and Water Management Plan (SWMP) developed by HASLIN Constructions for the Eurobodalla Southern Water Supply Storage Project and provided to the NSW Environment Protection Authority (EPA) on 8 August 2022.

Thank you for providing the EPA with the opportunity to review the draft SWMP associated with this stage of the project. The EPA does not approve or endorse environmental management plans; however, the EPA has taken the opportunity to note the following comments on the SWMP.

The EPA acknowledges that SWMP prioritised re-use of dirty water collected in sediment basins over discharge to receiving waters. However, the SWMP also proposes the use of several temporary sediment basins that appear to rely on chemical dosing to assist flocculation and discharge to the environment following significant wet weather events (uncontrolled discharges) or controlled discharges following treatment of sediment basin water.

The EPA reminds the proponent that Section 120 of the Protection of the Environment Operations Act 1997 applies to any discharges from the proposal site. In this regard the proponent must ensure that any discharge does not pollute the receiving waterway. The receiving environment for the project is Tuross River which flows into the high conservation value Batemans Bay Marine Park, as such the EPA considers a high standard of planning and implementation of sediment and erosion controls should be considered and implemented.

A thorough consideration and assessment of alternatives to direct discharge to the environment is preferred to the use of flocculants to protect the NSW Water Quality Objectives (NSW WQO) of the receiving environment. This may include measures such as temporary storage, dust suppression and irrigation onto land or dirt roads.

Where a chemical has potential to have non-trivial impacts on the environment, it is the responsibility of the person using that chemical to ensure that the potential impacts are fully identified, managed, and mitigated. Considering the potential water pollution risks associated with the use of flocculants and coagulants, all components of a potential discharge from the sediment basins that may impact receiving waters must be assessed.

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

TTY 133 677, then
ask for 131 155

Locked Bag 5022
PARRAMATTA
NSW 2124

4 Parramatta Square
12 Darcy Street
PARRAMATTA
NSW 2150

info@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758

In this regard, included to this letter at Attachment A, the EPA has provided some environmental assessment requirements which will assist the effectiveness and environmental risks of the use of the flocculant.

The EPA notes the management plans incorporate the advice the EPA has given during other stage of the project, in particular the development of Trigger Action Response Plan (TARP) which identifies numerous triggers, notifications, response actions and how to prevent a recurrence.

If you have any further questions about this issue, please contact Ms Nirmala Dharmarathne, Operations Officer, Regulatory Operations, on (02) 6229 7002 or at info@epa.nsw.gov.au.

Yours sincerely



Matthew RIZZUTO
Unit Head
Regulatory Operation Regional

ATTACHMENT A**Dose concentration calculations and sediment dam water characterisation**

Details of:

- The dose concentration(s) of the proposed flocculant
- A characterisation of the expected quality in terms of all pollutants present that pose a risk of non-trivial harm to the environment if an overflow to receiving water was to occur
- An assessment of the potential impact of discharges on the environmental values of the receiving waterway with reference to the Australian and New Zealand Guidelines for Fresh and Marine Water Quality guideline values (the Water Quality Guidelines)
- The degradation rate of the flocculant and the potential for accumulation in bed sediments of the receiving waterway.

Management of materials from basins

Provide details of proposed management of material accumulated in the sediment dam including testing and potential waste management.

Storage

Demonstrate flocculant material will always be appropriately stored on site.

Ecotoxicology testing

Ecotoxicology testing of the flocculant, by a NATA accredited lab, of representative test species across a range of taxonomic groups is required to provide data on the potential environmental risk.

Both the product concentrate/s and the treated sediment dam water should be tested. The current minimum number of species for toxicity data is at least five that belong to at least four taxonomic groups, as recommended by the Water Quality Guidelines, though the EPA encourages the use of more species and taxonomic groups for this high conservation environment. The selection of species in each taxonomic group should be representative and should include:

- Fish *Melanotaenia splendida* (vertebrate) – 96 hour imbalance test (or appropriate alternate test)
- Shrimp *Paratya australiensis* (invertebrate macrocrustacean) – 96 hour lethality test
- Cladoceran *Ceriodaphnia dubia* (invertebrate microcrustacean) – 48 hour immobilisation/survival test (or appropriate alternate test)
- Alga *Raphidocelis subcapitata* (microalga) – 72 hour growth inhibition test
- Bacterium *Vibrio fischeri* (bacterium) (Microtox) - bioluminescence inhibition test
- Duckweed *Lemna disperma* - growth inhibition test

RE: Eurobodalla Southern Water Supply Storage project



Carla Ganassin <carla.ganassin@dpi.nsw.gov.au>

To: Nicholas Francesconi

Cc: Andrew Lynam

You forwarded this message on 29/07/2022 6:19 PM.

Reply Reply All Forward

Fri 29/07/2022 2:06 PM

Hi Nicholas,

Thanks for checking in with DPI Fisheries about this. We do not have an interest in reviewed the Flora & Fauna and Water Quality Sub-Plans for the dam construction works.

That said, please ensure best practice erosion and sediment control techniques are used during construction to manage and mitigate sedimentation inputs to the tributary and Tuross River downstream.

Regards,

Carla Ganassin

Senior Fisheries Manager, Coastal Systems

DPI Fisheries | Aboriginal Fishing & Marine & Coastal Environments

Department of Regional NSW

T 4222 8342 M 0447 644 357 E carla.ganassin@dpi.nsw.gov.auregional.nsw.gov.au

Block E Level 3, 84 Crown St (PO Box 5106) Wollongong NSW 2520

Department of Primary Industries
Department of Regional NSW

We stand on Country that always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for Elders past, present and emerging. We are committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.



Department of Planning and Environment

DOC22/726023-2

The General Manager
Eurobodalla Shire Council
PO Box 99
MORUYA NSW 2537

Attention: Harvey Lane

7 September 2022

By email: Harvey.lane@esc.nsw.gov.au

Eurobodalla Southern Storage SSD 7089 Stage 5 CFFMP review

Thank you for referring the Stage 5 Construction Flora and Fauna Management Plan (CFFMP) for our first review to Biodiversity and Conservation Division (BCD) for our review and comments.

We have reviewed the CFFMP and note the following;

- No timeframe is provided for the proposed clearing of remaining vegetation.
- All identified hollow bearing trees (HBTs) have been removed, however some may remain in uncleared areas
- Pre-clearance surveys will be carried out to identify any remaining HBTs.
- Remaining HBTs will be removed during February/first 2 weeks of March following the Habitat Tree Clearing process in the CFFMP.
- If a HBT is to be removed outside the February/March timeframe then *Table 7-1- Flora and fauna management and mitigation measures M10* states that the project ecologist will be consulted.
- Figures 4-2 - does not indicate where the clearing boundary is located in comparison to the current extent of clearing.

Following a conversation between yourself and Ms Lyndal Walters of BCD, we understand that clearing of the remainder of the vegetation is likely to commence late September or early October and take approximately 4 months.

BCD do not support the clearing of HBTs outside the February/March timeframe unless it can be clearly demonstrated that the hollows are not being occupied by threatened species.

As such, BCD recommend the CFFMP be updated to include the following;

- Include details on how additional HBTs identified in the pre clearance surveys will be managed if they need to be removed outside the consent timeframe of February and first 2 weeks of March.
- Table 7-1, M10 should be updated to include consultation with the Secretary of Planning and BCD.
- Figures 4-1 and 4-2 should be combined to clearly show the current extent of the clearing and clearing boundary.

Attachment 1 – Detailed comments on BCD review of the Stage 5 CFFMP for SSD 7089

BCD understands that this Plan applies to Stage 5 of the approved project, being the construction of all remaining works on site including the removal of the remaining vegetation within the clearing boundary, as well as grubbing works and removal of any remaining habitat trees identified during the pre-clearing inspections.

Whilst all identified HBTs have been removed during Stage 4, we note that there may be a possibility that additional HBTs will be located when clearing the remaining vegetation. Remaining HBTs may provide breeding habitat for threatened species on the site, which may be impacted if clearing is to occur outside the February/March timeframe.

These include;

- Gang-gang cockatoo - *Callocephalon fimbriatum*: Breeding - October to January
- Eastern Coastal Free-tailed bat - *Mormopterus norfolkensis*: Winter breeding, young in a crèche until autumn
- Yellow-bellied Sheath-tail-bat - *Saccolaimus flaviventris*: Winter breeding, young at foot until autumn
- Sooty owl - *Tyto tenebricosa*: Breeding - March to September.

The Conditions of consent require that all clearing of vegetation be carried out in February/March.

We note in this CFFMP that the possibility of clearing HBTs in winter has been raised, however given that winter is now over, it is unlikely to be an issue for the eastern pygmy possums who will be leaving torpor, particularly as we now understand that the clearing is due to commence in late September/early October and will continue for approximately 4 months. As such we recommend that the CFFMP be updated to include this timeframe.

In particular, the text below should be updated to include information on actual clearing timeframes and possible impacts on other threatened species as listed above.

The remaining clearing works will be avoided in the mid-winter period of July and August to minimise impacts to threatened species breeding in hollows, however because the vast majority of hollow bearing trees have already been cleared it is considered that clearing of non-hollow bearing trees can be undertaken between July and August with no impact to threatened species. Should hollow bearing trees be identified on site that require clearing in winter, a targeted hollow bearing tree clearance report will be prepared by the ecologist and provided to the Secretary of Planning. The hollow bearing tree clearance report will outline whether fauna are occupying the hollow, procedures to safely remove hollows and manage tree clearing.

In addition, Requirement M10 states that "Clearing of HBT to only occur between the start of February and first 2 weeks of March unless advised by the project ecologist." However, as it is a consent condition, it is not a decision that can be made by the project ecologist. BCD consider consultation is required with both BCD and the Department Secretary if this condition cannot be met. The CFFMP should detail how this situation will be managed including steps required to demonstrate that no threatened fauna is occupying the HBTs to be removed.

For more detailed comments please refer to Attachment 1.

If you have any further questions about this issue, please contact Ms Lyndal Walters, Senior Conservation Planning Officer, on 02 6229 7157 or at rog.southeast@environment.nsw.gov.au

Yours Sincerely



Allison Treweek
Senior Team Leader Planning
South East, Biodiversity and Conservation

Enclosure: Attachment 1 – Detailed comments on BCD review of the Stage 5 CFFMP for SSD 7089

cc: Kyle Johannes and Mark Wisely – Department of Planning and Environment