






INTERNAL



Accommodation Camp Management Plan EnergyConnect (NSW – Western Section) Stage 1 45860-HSE-PL-G-1027

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Rev.	Detailed Description
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B	Updated following receipt of Transgrid's comments
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Key Document Stakeholders
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Abbreviations

Acronym	Definition
ACMP, this plan	Accommodation Camp Management Plan
Amendment Report	<i>EnergyConnect (NSW – Western Section) Amendment Report</i>
APZ	Asset protection zone
BAL	Bushfire attack level
CCS	Community Communication Strategy
CCTV	Closed-circuit television
CEMP	Construction Environmental Management Plan
Council	Wentworth Shire Council
CSSI	Critical State significant infrastructure
Cth	Commonwealth of Australia
DAWE	Department of Agriculture, Water and the Environment
DPIE or Department	NSW Department of Planning, Industry and Environment
EIS	<i>EnergyConnect (NSW – Western Section) Environmental Impact Statement</i>
EMS	Environmental Management System
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>(Commonwealth) Environment Protection and Biodiversity Conservation Act 1999</i>
ER	Environmental Representative
HSSE	Health, Safety, Security and Environment
IC	Incident Controller
ICNG	Interim Construction Noise Guideline
NMLs	Noise management levels
NSW	New South Wales
NSW RFS	NSW Rural Fire Service
PAD	Potential archaeological deposit
PESCPs	Progressive erosion and sediment control plans
PIC	Person In Charge
Planning Secretary	Planning Secretary under the EP&A Act, or nominee
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
project, the	EnergyConnect (NSW – Western Section)
RAPs	Registered Aboriginal Parties
Response to DPIE Request for Information	The ‘additional information letter dated 10 August 2021’ in the definition section of the Infrastructure Approval; document is also titled <i>EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions</i>
RMMs	Revised mitigation measures
SA	South Australia
SAPs	Sensitive area plans
SecureEnergy	Elecnor and Clough Projects Australia Pty Ltd have formed the SecureEnergy Joint Venture (SecureEnergy). SecureEnergy is the contractor who will be carrying out the project on behalf of Transgrid.
SSI	State significant infrastructure
Submissions Report	<i>EnergyConnect (NSW – Western Section) Submissions Report</i>

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Acronym	Definition
WMS	Work method statement
WWTPs	Wastewater treatment plant

1 Introduction

1.1 Context

This Accommodation Camp Management Plan (ACMP or this plan) forms part of the Environmental Management System for EnergyConnect (NSW – Western Section).

This plan has been prepared to address the relevant requirements of the Infrastructure Approval (SSI 10040), the *EnergyConnect (NSW – Western Section) Environmental Impact Statement (EIS)*, the *EnergyConnect (NSW – Western Section) Submissions Report* (Submissions Report), the *EnergyConnect (NSW – Western Section) Amendment Report* (Amendment Report) and the additional information letter dated 10 August 2021 (Response to Department of Planning, Industry and Environment (DPIE) Request for Information).

1.2 Background

On 29 August 2019 the NSW Minister for Planning and Public Spaces declared EnergyConnect critical State significant infrastructure (CSSI) under the *Environmental Planning and Assessment Act 1979* (EP&A Act) on the basis that it is critical to the State for environmental, economic or social reasons. Within NSW, EnergyConnect is therefore subject to assessment under Part 5, Division 5.2 of the EP&A Act.

Transgrid have two environmental planning approval applications for the sections within NSW:

- EnergyConnect (NSW – Western Section) – SA/NSW border to Buronga and Buronga to the NSW/Victorian border (the project); and
- EnergyConnect (NSW – Eastern Section) – Buronga to Wagga Wagga.

A referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was submitted on 27 May 2020. The Australian Department of Agriculture, Water and the Environment (DAWE) determined the project to be a controlled action on 26 June 2020 and thus, it would be assessed using the bilateral assessment process. As such, the project also requires approval from the Australian Minister for the Environment under the EPBC Act.

The EIS was prepared for the project in October 2020 and was placed on public exhibition from 30 October 2020 to 10 December 2020. A total of 20 submissions were received, with 15 from government agencies, three from organisations and two from the public.

The Submissions Report was prepared for the project in response to the submissions and was finalised on 14 April 2021.

Transgrid also prepared a separate Amendment Report to document design changes and additional environmental assessment undertaken since exhibition of the EIS. The Amendment Report describes the updated project for which approval has been sought and was finalised on 14 April 2021.

On 7 May 2021, DPIE requested additional information (*EnergyConnect (NSW – Western Section) (SSI-10040) Request for Additional Information*) to assist with the assessment of the project. In response Transgrid prepared and provided the Response to DPIE Request for Information, which included revised mitigation measures (RMMs) which are to be applied. The Response to DPIE Request for Information was dated 10 August 2021.

Approval for the project under the EP&A Act was granted by the NSW Minister for Planning and Public Spaces (Infrastructure Approval SSI 10040). Approval for the project under the EPBC Act was granted by the Australian Minister for the Environment.

Transgrid have engaged SecureEnergy, a joint venture between Elecnor and Clough Projects Australia Pty Ltd to design and construct their portion of the EnergyConnect project.

Some activities will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval. These works will remain excluded from the definition of 'construction' and will therefore not be subject to this ACMP.

This ACMP has been prepared specifically for EnergyConnect (NSW – Western Section).

1.3 Environmental management system

This ACMP forms part of the SecureEnergy's environmental management framework for the project. The overall Environmental Management System for the project is further described in Section 5 and indicated by Figure 5.1.

Management measures identified in this plan will be incorporated into relevant site-based documents including, but not limited to, site or activity specific work packs, work method statements (WMSs), or training and awareness material.

1.4 Purpose and objective

The purpose of this ACMP is to describe the environmental management approach to be adopted during the operation of the following accommodation camps:

- accommodation camp at Buronga; and
- accommodation camp at Wentworth.

In accordance with the Infrastructure Approval, operation of the accommodation camps is excluded from the definition of 'construction' and will therefore not be subject to the requirements of the Construction Environmental Management Plan (CEMP).

The key objective of this plan is to detail management measures and inform site procedures so that environmental impacts are minimised and managed within the scope permitted by the Infrastructure Approval. To achieve this objective, the following will be undertaken:

- implement appropriate measures to address the requirements outlined in the Infrastructure Approval and the Response to DPIE Request for Information;
- implement appropriate measures during the operation of the camps to minimise environmental impacts; and
- implement appropriate measures to comply with the relevant legislative requirements as described in Section 2.1 of this plan.

1.5 Consultation

In accordance with condition D52 of the Infrastructure Approval, this plan has been prepared to the satisfaction with Wentworth Shire Council. This plan was issued to Wentworth Shire Council on 15 November 2021. Wentworth Shire Council did not return a response to this plan at the completion of the consultation process. Details of all consultation with Wentworth Shire Council in relation to this plan will be provided separately.

1.5.1 Ongoing communication and consultation

SecureEnergy will use a range of tools in accordance with the *Community Communication Strategy* (CCS) (45860-CM-PL-G-1001) to facilitate ongoing consultation and communication with the community and stakeholders regarding the project. Communication tools include, but are not limited to, stakeholder briefings, project website, community drop-in sessions via the project's mobile van, door knocks and project factsheets. Notifications will be issued for, but not limited to the following: commencement of construction, significant milestones and changes to the scope of work. Refer to the CCS for further information.

In accordance with condition E12 a) of the Infrastructure Approval, project documents including the EIS, approved strategies, plans or programs required under the conditions of approval will be publicly available on the project website. The project website is <https://www.projectenergyconnect.com.au>. A 24-hour toll-free telephone number (1800 560 577) is also available for any project enquiries.

1.6 Submission and approval

Prior to finalisation of this plan, the ACMP will be reviewed by the Environmental Representative (ER) to ensure that the plan is consistent with the requirements of the Infrastructure Approval. A written statement to this effect will be prepared. This review will be undertaken in accordance with condition A19 of the Infrastructure Approval.

This ACMP will be prepared to the satisfaction of Wentworth Shire Council (council) prior to the construction of the accommodation camps. The approved ACMP will then be implemented for the duration of the accommodation camp operation.

1.7 Continuous improvement

The Plan-Do-Check-Act model will be applied to the continuous improvement process.

The Plan stage outlines the environmental objectives and the process to achieve the results. This is outlined through the Environmental Management System (EMS) described in Section 5 of this ACMP and supported by the Environmental Aspect and Impact Register provided within Appendix C.

The Do stage focuses on the implementation of the EMS. Tools such as Work Packs and Work Method Statements described in Section 5.3 will be prepared to facilitate the implementation of the EMS. The Work Packs and Work Method Statements will be supported by drawings, forms and plans. The various communication methods to carry out the Do stage is outlined in Section 8.

The Check stage comprises ongoing monitoring of the environmental management performance against the environmental objectives, for the purpose of identifying opportunities for improvement. This will be undertaken through regular environmental inspections, monitoring and auditing as described in Section 10.

The Act stage include undertaking the required actions in order to achieve the environmental objectives. Corrective and preventive actions are further described in Section 11. In addition to this, for any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Environmental Manager to coordinate the preparation of the revised documents, as further described in Section 1.7.

1.8 Updating the ACMP

In accordance with condition E1 of the Infrastructure Approval, SecureEnergy will review and, if necessary, revise the applicable strategies, plans or programs required by the Infrastructure Approval to the satisfaction of the Planning Secretary within three months of the following:

- submission of an incident report under condition E6 of the Infrastructure Approval;
- submission of an audit report under condition E11 of the Infrastructure Approval; or
- any modifications to the Infrastructure Approval.

Further to this, a document review process will be implemented to ensure that the environmental management practices and procedures which are to be implemented for construction as required by this ACMP, are updated as appropriate for the specific works that are occurring on-site. The document review process of the ACMP or other approval documents required under the Infrastructure Approval will be undertaken:

- in response to changes in the applicable legislation;
- where requested or required by DPIE (condition A3);
- where deficiencies in the ACMP are identified in inspections, monitoring, or complaints;
- in response to project changes as described in Section 1.9; and
- annually where the above circumstances do not arise.

Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Environmental Manager or their

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delegate to prepare the revised documents. The revised document will then be issued to the Project Director for internal approval and reviewed by Transgrid prior to re-issue.

Minor changes to the ACMP may be required during delivery of the project. The Environmental Representative will consider and approve minor changes to the ACMP. Minor changes involve updating the approved environmental documents that:

- are administrative in nature (e.g. staff and agency/authority name changes);
- do not increase impacts to nearby sensitive receivers;
- are consistent with the terms the Infrastructure Approval and the other documents approved by the Planning Secretary;
- are in response to audit findings relating to procedures and processes of the environmental management system;
- in response to changes in the applicable legislation such that the project complies with the amended legislative requirements; or
- any other changes or updates that considered minor by the Environmental Representative.

Changes to the ACMP that are not defined as minor will be discussed with Wentworth Shire Council to confirm the need for further review and approval. If required, the updated ACMP will be submitted to Wentworth Shire Council for review and for receipt of their satisfaction of the revised plan.

As permitted by condition E2, with the agreement of the Planning Secretary, staged or updated strategies, plans or programs may be prepared without undertaking all of the consultation required under the applicable condition in the Infrastructure Approval.

1.9 Changes to the project

Amendments or changes to the project may result from detailed design refinements or changed methodologies throughout construction.

Design and construction methodology changes will be communicated to SecureEnergy's Environmental Manager. The Environmental Manager will review the proposed change in consultation with the Transgrid Environmental Manager where required, and the Environmental Representative to determine whether it is consistent with the approved project.

Changes that are not consistent with the approved project will be discussed with DPIE to confirm requirements. Transgrid as the Proponent will apply for any required formal modifications to the approved project.

If any changes to the project require changes to the ACMP, the Environmental Manager will identify the required changes and update the ACMP as required by Section 1.8.

2 Environmental requirements

2.1 Legislation

Legislation relevant to the management of the aspects within the accommodation camp includes:

- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Commonwealth (Cth));
- *State Environmental Planning Policy (State and Regional Development) 2011*;
- *Environmental Planning and Assessment Act 1979*;
- *Biodiversity Conservation Act 2016*;
- *Local Land Services Act 2013*;
- *Rural Fires Act 1997*;
- *Protection of the Environment Operations (Waste) Regulation 2005*;
- *Contaminated Land Management Act 1997*;
- *Protection of the Environment Operations Act 1997*;
- *Heritage Act 1977*;
- *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005*;
- *National Parks and Wildlife Act 1974*; and
- *Native Title Act 1994* (Cth).

Relevant provisions of the above legislation are detailed within the register of legal and other requirements included in Appendix A of this ACMP.

2.2 Conditions of Approval

The conditions of the Infrastructure Approval relevant to this ACMP for the project are presented in Table 2.1. A cross reference is also included to indicate where the condition is addressed within this plan or other project management documents.

Table 2.1 - Conditions of Approval relevant to the accommodation camps

Condition no.	Requirement	Where addressed	How addressed
Flooding			
D21	The Proponent must ensure that the development:		
	a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and	Section 7.1	Key facilities within the Wentworth accommodation camp area will be elevated off the ground to minimise the potential to materially alter the flood storage, capacity, flows or characteristics.
	b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council.	Section 7.1	Land within the accommodation camp area will have a falling grade of approximately 0.5% (up to 1.0%) from the centreline, a temporary drainage channel around the boundary, and a sediment basin to capture sediment-

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Condition no.	Requirement	Where addressed	How addressed
			laden surface water runoff. These measures will be designed, constructed and maintained to minimise impacts to surface water quality and localised flooding.
Operating conditions			
D46	The Proponent must:		
	a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Section 7.3	The management of the accommodation camp to minimise fire risk is outlined in Section 7.3. In addition, vegetation inside the accommodation camp sites will be regularly maintained to a maximum height of 75mm.
	b) ensure that the development: <ul style="list-style-type: none"> complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset Protection Zones; is suitably equipped to respond to any fires on site, including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps; incorporates the recommendations of a fire risk assessment as per Transgrid's design standards; 	Section 7.3	<p>A 50m wide asset protection zone will be implemented around the perimeter of occupied buildings at the accommodation camps unless an alternative fire protection approach that complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> and achieves the same level of bushfire risk management is identified by a suitably qualified specialist during detailed design.</p> <p>Each accommodation camp will have firefighting equipment including a dedicated 20,000L water supply with a 65mm Storz fitting and a FRNSW compatible suction connection.</p> <p>Transgrid's Bushfire Management Risk Management Plan only covers existing network assets. There are no 'Transgrid design standards' that apply to temporary construction facilities such as accommodation camps. This requirement is therefore not relevant to the accommodation camp.</p>
	c) ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS3959-2018 <i>Construction of buildings</i>	Section 7.3	Accommodation camps will be built to Bushfire Attack Level (BAL) rating 12.5. The accommodation

Condition no.	Requirement	Where addressed	How addressed
	<i>in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019;</i>		camps will therefore comply with the relevant BAL12.5 requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> , and the relevant requirements of Section 3 and Section 5 of AS 3959: 2018 <i>Construction of buildings in bushfire-prone areas</i> .
	d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;	Section 7.3	The bushfire and fire response procedure, as described in Section 7.3, will be implemented in the event there is a fire within, or in the vicinity of, the accommodation camp sites.
	e) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and	Section 7.3	Although site personnel are not employed as firefighters, site personnel will assist fire emergency services where practicable, reasonable and safe to do so.
	f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.	Not applicable	Not applicable as operation is defined within the Infrastructure Approval as operation of the CSSI project upon completion of construction.
Accommodation camp			
D52	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan to the satisfaction of Council, unless the Planning Secretary agrees otherwise. The plan must:	This plan	This ACMP was prepared to the satisfaction of Wentworth Shire Council.
	a) ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards, in consultation with Council;	Section 4.2	Utilities at the accommodation camps will be designed in accordance with <i>Division 3, Subdivision 4 of the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021</i> .
	b) ensure the accommodation camp complies with conditions D21 and D46;	Where condition D21 and D46 are addressed is provided in the rows above.	How conditions D21 and D46 are addressed is provided in the rows above.

Condition no.	Requirement	Where addressed	How addressed
	c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction: <ul style="list-style-type: none"> complies with <i>the Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) guidelines for irrigation water quality</i>; meets the requirements of the <i>Public Health Act 2010</i>; 	Section 7.4	The treated wastewater quality will be treated to comply with ANZECC & ARMCANZ 2000 guidelines for irrigation water quality and any relevant requirements of the <i>Public Health Act 2010</i> .
	d) include measure for dust suppression within the accommodation camps;	Section 7.3.1 MM11 to MM14	Onsite management measures to suppress dust generation is provided in the table of Appendix D MM11 to MM14.
	e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and	Section 4.1	Indicative site layouts are provided in Section 4.1 of this ACMP.
	f) include measures to support local suppliers in servicing the camp where possible.	Section 8.3 Local Business and Employment Strategy	A <i>Local Business and Employment Strategy</i> (45860-CM-PL-G-1002) has been developed and considers the local market conditions and capacity.
	Following approval, the Proponent must implement the Accommodation Camp Management Plan.	Section 1.6	This ACMP will be implemented following approval.

2.3 Revised mitigation measures

The revised mitigation measures (RMMs) are defined in Appendix G of the Response to DPIE Request for Information. The RMMs relevant to the management of environmental aspects of the accommodation camps are presented in Appendix B.

A cross reference is also included to indicate where the measure is addressed within this plan or other project management documents. The management measures that will be implemented for the project are provided in Appendix D.

2.4 Guidelines

The main guideline relevant to this plan is:

- AS 3959:2018 *Construction of buildings in bushfire-prone areas*;
- Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*;
- NSW Department of Primary Industries, 2015, *Recycled Water - Guidance Document, Recycled Water Management Systems*;
- Landcom, 2004, *Managing Urban Stormwater: Soils and Construction Volume 1*, 4th Edition and Volume 2D Main Roads Construction (DECC 2008) - commonly referred to as the 'Blue Book';
- Natural Resource Management Ministerial Council, Environment Protection and Heritage Council and Australian Health Ministers' Conference (2006) *National Water Quality Management Strategy – Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 1)*;

- NSW Department of Environment and Climate Change (DECC), 2009, *Interim Construction Noise Guideline* (ICNG);
- NSW Department of Environment, Climate Change and Water, 2008, *Managing Urban Stormwater – Soils and Construction, Volumes 2A and 2C* - commonly referred to as the 'Blue Book'; and
- NSW Rural Fire Service, 2019, *Planning for Bushfire Protection – A guide for councils, planners, fire authorities and developers*, Sydney.

The documents identified above are considered by the project as described and referenced throughout this ACMP.

3 Accommodation camps

The EIS identified two accommodation camp sites that are required to support the construction phase of the project. These sites are essential to deliver the project. This ACMP describes the environmental management approach which will be adopted during the operation of the following accommodation camps:

- accommodation camp at Buronga; and
- accommodation camp at Wentworth.

The accommodation camps at Buronga and Wentworth do not require the utilisation or connection to the existing local council infrastructure during the operation phase. Refer to Table 4.1 for further detail.

3.1 Buronga accommodation camp

The Buronga accommodation camp site will be located in the vicinity of the Buronga substation and on the northern site of Arumpo Road, around 10km northeast from the township of Buronga. Refer to Figure 3.1 for the indicative site boundary.

Buronga accommodation camp will provide accommodation for approximately 340 project personnel along with other facilities such as food and catering facilities, fitness and recreational facilities (such as indoor and outdoor recreational spaces, gymnasium areas), parking space, first aid facilities and telecommunication services for personal use.

In addition, the camp will consist of other key infrastructure such as generators, storage of chemicals (such as oils, lubricant, wastewater treatment products and fuel), a sediment basin, a wastewater treatment plant (WWTP) which includes a lined basin type storage pond (turkey's nest).

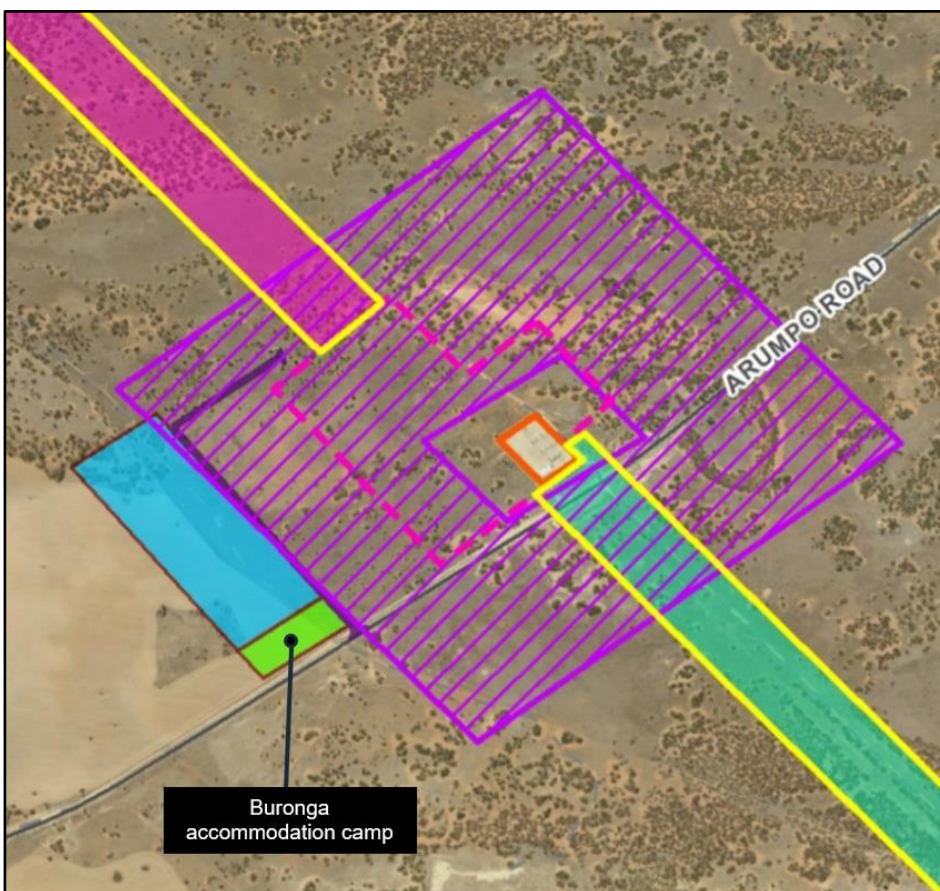


Figure 3.1 - Indicative site boundary of Buronga accommodation camp

3.2 Wentworth accommodation camp

The location for the Wentworth accommodation camp site has been identified on the northern side of Renmark Road, around 17 kilometres west of the township of Wentworth. Refer to Figure 3.2 for the indicative site boundary.

Wentworth accommodation camp will provide accommodation for approximately 160 project personnel along with other facilities such as food and catering facilities, fitness and recreational facilities (such as indoor and outdoor recreational spaces, gymnasium areas), parking space, first aid facilities and telecommunication services for personal use.

In addition, the camp will consist of other key infrastructure such as generators, storage of hazardous material, sediment basin, a WWTP along with a storage pond (turkey's nest).

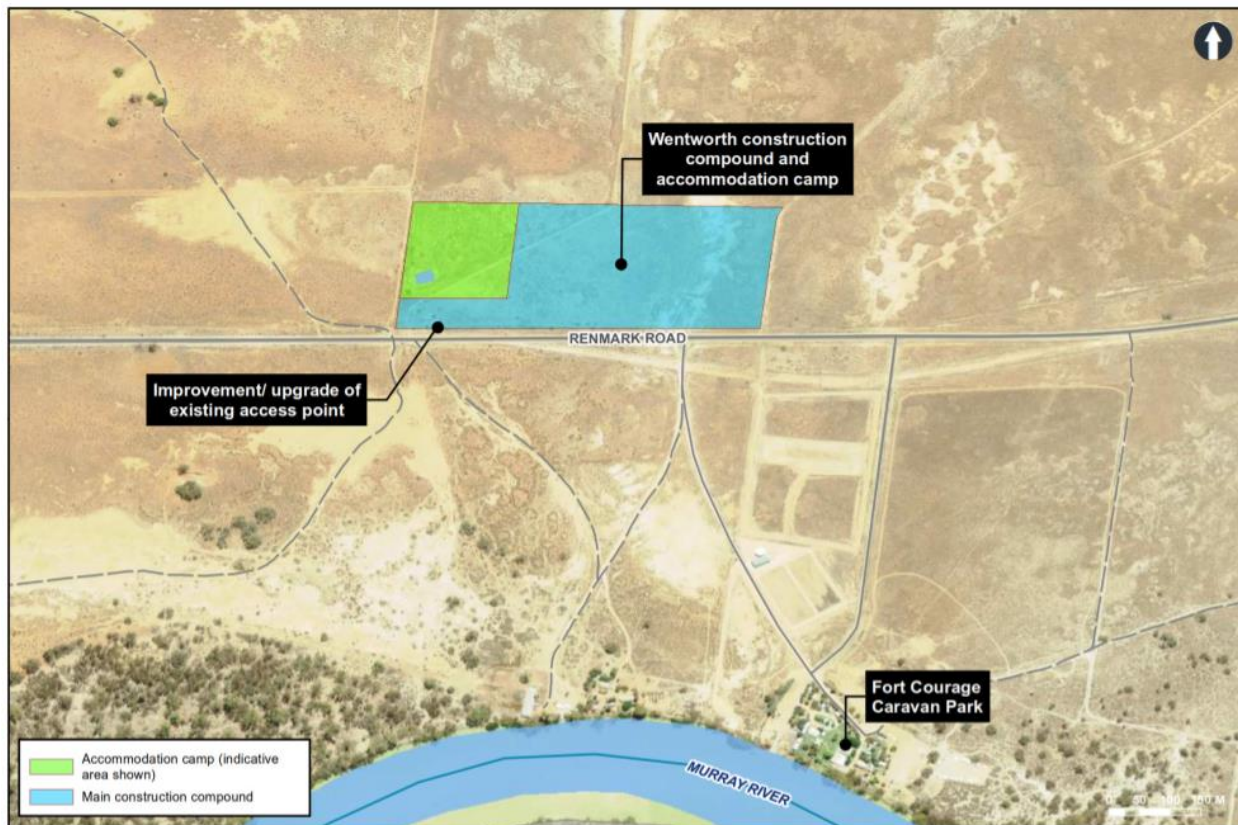


Figure 3.2 - Indicative site boundary of Wentworth accommodation camp

3.3 Fly camps

To facilitate construction of the Buronga and Wentworth accommodation camps, the operation of fly camps (or pioneer camps) are required at each site. Fly camps are temporary/semi-permanent structures to accommodate workers for a relatively short duration whilst the main accommodation camp is being constructed.

Both fly camps will be situated within the accommodation camp and construction compound site boundaries as indicated within Figure 3.1 and Figure 3.2.

The construction crew will utilise the fly camps until operation of the respective Buronga and Wentworth accommodation camps commence. The fly camps will include the number of beds required to accommodate the accommodation camp construction crew, portable kitchen facility, an initial laydown area, a site office, and ablution facility. The fly camps will improve logistical efficiency by eliminating the need to mobilise and demobilise the construction team from site each day during the construction of the accommodation camps.

The process of initiating/seeding the WWTPs will occur during the operation of the fly camps. This includes pre-filling the WWTP bioreactor with waste generated during the operation of the fly camps to commence the generation of adequate cells for the inoculation of the WWTP bioreactor. Initiating/seeding the WWTPs at this stage would allow adequate time for the cells to inoculate and for validation and verification monitoring to be undertaken. This ultimately allow the WWTP to operate at the designed operational performance. Refer to Section 7.4 for further details.

3.4 Activities

The key components of operating the accommodation camps include, but are not limited to, the activities provided in Table 3.1.

Table 3.1 - Key project components of operation of the accommodation camps

Key activity	Description of key activity
Operation of the fly camps are Buronga and Wentworth accommodation camp	<p>Fly camps are required to facilitate the construction of the Buronga and Wentworth accommodation camps. The fly camps will include the number of beds required to accommodate the accommodation camp construction crew, temporary ablution facility, portable kitchen facility and office rooms. The process of initiating/seeding the WWTPs will occur during the operation of the fly camps.</p> <p>The fly camps will be situated within the approved camp and compound site boundary.</p>
Operation of Buronga and Wentworth accommodation camp and associated facilities	<p>Both accommodation camps will operate for 24 hours for 7 days a week. Buronga accommodation camp will accommodate for 340 personnel at peak. While Wentworth accommodation camp will accommodate for 160 personnel at peak.</p> <p>The operation of Buronga and Wentworth accommodation facilities and associated facilities, includes but not limited to site offices, amenities, wastewater treatment plant, water treatment plant, power generators, hazardous material and fuel storage area, maintenance of asset protection zone and vegetation, waste collection, access points, carpark and internal roads.</p>
Operation of wastewater treatment plants at Buronga and Wentworth accommodation camp	<p>The wastewater treatment plant (WWTP) will manage and treat wastewater from the facilities such as toilets, bathroom sinks, kitchen sinks, showers and other suitable wastewater sources. The wastewater will be treated to the water quality objective detailed within Section 7.4 prior to reuse. To reduce waste disposal and resource use, the project will reuse treated wastewater for dust suppression within the accommodation camp where necessary, and in for other construction activities.</p>
Maintenance of the asset protection zones and vegetation	<p>From the commencement of operation of the camps and for every bushfire season throughout the project duration, the asset protection zones (APZ) of 50m width around the perimeter of occupied buildings will be regularly maintained to a maximum grass height of 100mm-150mm during the bushfire danger period or when the grassland fuel reaches 70 per cent cured.</p> <p>The APZ will remain in place and be maintained during the operation of the accommodation camp sites until demobilisation of each camp area.</p>

3.5 Operating hours

The EnergyConnect (NSW – Western Section) EIS advises that operation of the camps would be undertaken 24 hours a day, 7 days per week.

4 Utility design requirements

The following section addresses condition D52 a) of the Infrastructure Approval which requires that utilities at the accommodation camps, including water, wastewater, waste and electricity be designed and located in accordance with council specifications.

It should be noted that utilisation or connection to the existing local council infrastructure is unavailable at the Buronga and Wentworth accommodation camps. SecureEnergy will be providing alternative utility sources. This is further outlined Table 4.1.

Table 4.1 - Installation and connection of utility

Utilities	Description of utility requirement during operation of the accommodation camps
Water	No connection to potable water is available at Buronga and Wentworth accommodation camps. All water supply would be purchased and procured during the operation of the accommodation camps. As such, no connection and utilisation of water from the local water supply network is required.
Wastewater	No connection to the wastewater sewage system is available at Buronga and Wentworth accommodation camps. Any wastewater produced from the operation of the camps would be collected and feed into the on-site wastewater treatment plant for processing. As such, connection to the existing local sewerage system is not required. Wastewater will be treated to the water quality objective outlined in Section 7.4 prior to reuse onsite. Treated wastewater will be used for dust suppression and other construction activities as outline in Section 7.5.
Waste	Any waste produced would be transported to a licensed waste facility by SecureEnergy personnel or subcontractors. As such utilisation of local council waste transport vehicles is not required.
Electricity	An investigation into the existing electricity network is being undertaken to determine if the camps are suitable to connect into the local network. Otherwise, each camp would consist of generators sufficient in producing the required electricity for the operation of the camps. Connection and utilisation of the existing local electricity supply network is not required in the event generators are being used.

Division 3, Subdivision 4 of the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021*, is being applied to provide guidance to the design and location of the utilities at the accommodation camps.

Table 4.2 - Utility requirement of the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Ground and Moveable Dwellings) Regulation 2021*

Clause	Utility services	Requirements	How addressed
Clause 27	Water supply	(1) A manufactured home estate must be – (a) connected to a mains water supply, or (b) provided with an alternative water supply service as specified in the approval.	Water supply will be transported to each accommodation camp as a form of alternative water supply service.
		(2) A dwelling site must be – (a) connected to the water supply service for the manufactured home estate, and (b) provided with – (i) a separate water meter, and (ii) a separate water service isolating valve.	Not applicable. The accommodation camps would operate collectively under the project and not as individual dwelling sites.

Clause	Utility services	Requirements	How addressed
		<p>(3) The water supply service must comply with –</p> <p>(a) the <i>Plumbing and Drainage Act 2011</i> and the regulations made under that Act, and</p> <p>(b) the requirements of a relevant statutory body.</p>	Internal water supply pipes and plumbing will comply with the <i>Plumbing and Drainage Act 2011</i> and the requirements of any relevant statutory body.
		<p>(4) The water supplied for human consumption or domestic purposes must comply with the <i>Australian Drinking Water Guidelines 6</i> published in October 2011 by the National Health and Medical Research Council.</p>	Water supplied for human consumption or domestic purposes will comply with the <i>Australian Drinking Water Guidelines 6</i> . Potable water will be acquired from a potable water supply point and transported to site for use.
Clause 28	Sewerage	<p>(1) A manufactured home estate must be</p> <p>(a) connected to a main sewer, or</p> <p>(b) provided with an alternative sewage disposal system as specified in the approval.</p>	WWTPs will be established and operational at each accommodation as a form of alternative sewage disposal system.
		<p>(2) A dwelling site must be connected to the sewage disposal system for the manufactured home estate.</p>	The facilities within the accommodation camps where wastewater will be generated will be connected to the WWTPs.
		<p>(3) The sewage disposal system must comply with -</p> <p>(a) the <i>Plumbing and Drainage Act 2011</i> and the regulations made under that Act, and</p> <p>(b) the requirements of a relevant statutory body.</p>	Sewage disposal system will comply with the <i>Plumbing and Drainage Act 2011</i> and the requirements of any relevant statutory body.
Clause 29	Drainage	<p>(1) A manufactured home estate must be provided with a stormwater drainage system as specified in the approval.</p>	The accommodation camps would capture and collect the stormwater that falls within the site boundary and reuse as dust suppression.
		<p>(2) A dwelling site must be -</p> <p>(a) connected with the stormwater drainage system for the manufactured home estate, or</p> <p>(b) provided with an on-site stormwater drainage system.</p>	Not applicable. The accommodation camps would operate collectively under the project and not as individual dwelling sites.
		<p>(3) A stormwater drainage system must comply with -</p> <p>(a) the Plumbing Code of Australia, and</p> <p>(b) the requirements of a relevant statutory body.</p>	Stormwater drainage will be managed through grading of the site with temporary drainage channels at the accommodation camp boundary to redirect potential stormwater runoff to the sediment basin for discharge.
Clause 30	Electricity supply	<p>(1) A dwelling site must be supplied with electricity from a reticulated electricity service by an electrical circuit connected to a separate electricity meter.</p>	Not applicable. Electricity will be supplied through electrical generators at each accommodation camp.
		<p>(2) The electrical circuit must be installed in accordance with the Australian/New Zealand Wiring Rules.</p>	The electrical circuit will be installed in accordance with the AS/NZS 3000:2018.

Clause	Utility services	Requirements	How addressed
		(3) The maximum capacity of the electrical circuit supplying a dwelling site is not required to be more than 32 amperes if the site is provided with gas, whether by a reticulated gas service or on-site gas containers.	Noted. On-site gas containers will be established at each accommodation camp.
		(4) If a dwelling site is provided with electricity otherwise than by a direct connection to the local electricity supply authority's electricity main, the occupant of the dwelling site may only be charged reasonable charges for the supply of the electricity.	An investigation into the existing electricity network is being undertaken to determine if the camps are suitable to connect into the local network. Otherwise, each camp would use onsite generators sufficient in producing the required electricity for the operation of the camps.
Clause 31	Telephone lines	Telephone services, if available, must be provided by a telephone connection that is available to each dwelling site within the manufactured home estate.	The project will connect to the existing communication network at Buronga substation. This will require the installation of underground communication cables from accommodation camp to the substation.
Clause 32	Common trenches	A common trench may be used for the installation of services in accordance with guidelines provided in AMCORD.	Trenching for the purpose of installation of subsurface utilities (water, wastewater, waste and electricity) is generally not anticipated for the project. If common trenching is required, it will be undertaken in accordance with AMCORD.

4.1 Site layout

Figures showing the indicative site layout of the accommodation camps at Buronga and Wentworth are provided below. The figures provide an indicative site layout design and relative placement of items in respect to one another. The site layout of the accommodation camp is subject to changes during the detail design phase.

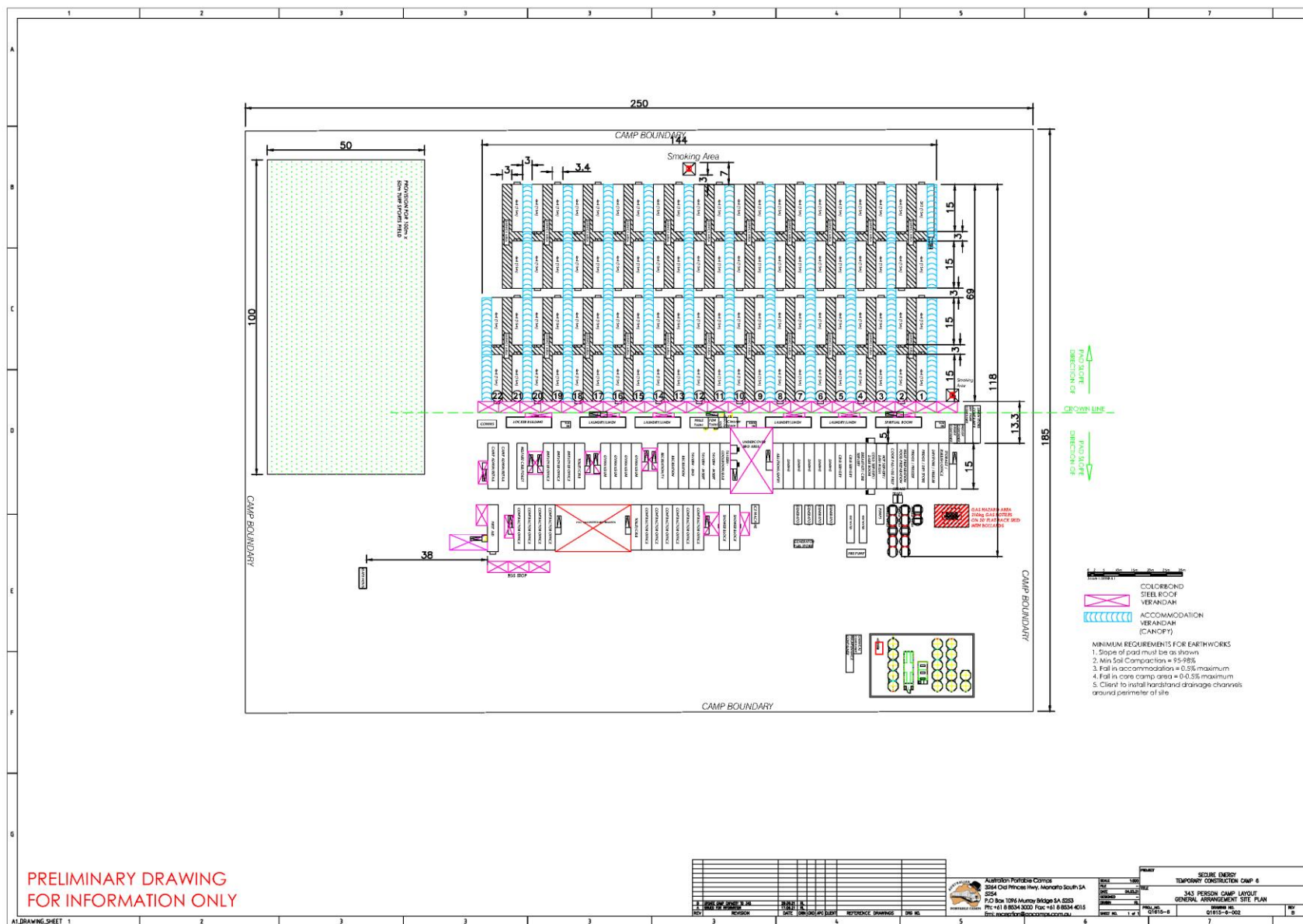


Figure 4.1 - Indicative site layout of Buronga accommodation camp

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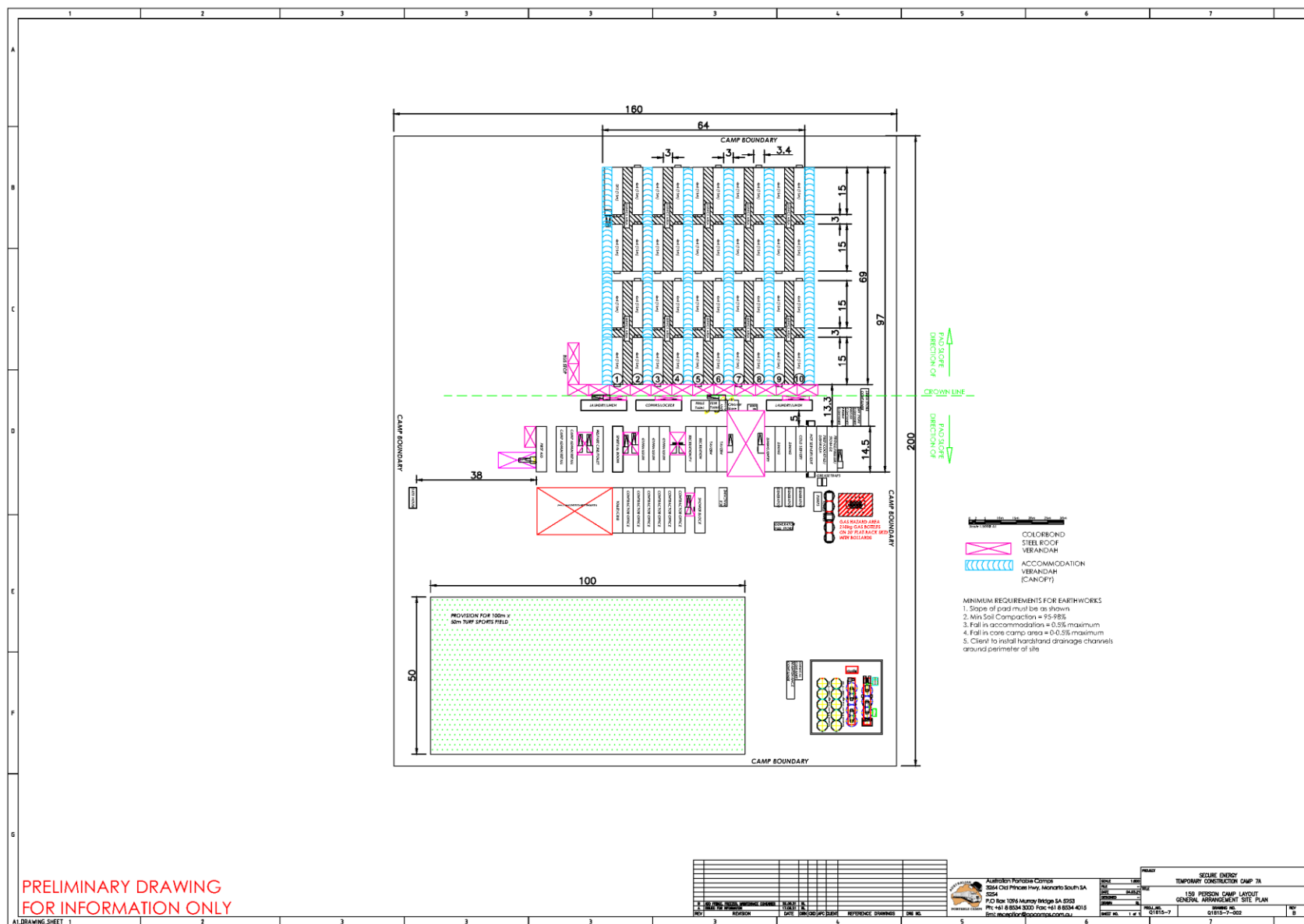


Figure 4.2 - Indicative site layout of Wentworth accommodation camp

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5 Environmental management approach

The potential environmental impacts associated with the operation activities are described in the following sections.

5.1 Environmental management system overview

The SecureEnergy overall management system includes the Environmental Management System (EMS). It has been designed to comply with the requirements of *ISO 14001 Environmental management systems*.

The Health, Safety, Security and Environment Management Manual (HSSE Manual) describes the Environmental Management System for SecureEnergy. Table 5.1 summarises the EMS components.

Table 5.1 - Environmental Management System components

Management System Component	Description
HSSE Policy & HSSE Management Expectations	The policy sets the overall guidelines and direction to HSSE and represents the commitment of management to the achievement of its aims. The <i>HSSE Management Expectation</i> clearly defines minimum expectations to ensure that all SecureEnergy personnel and subcontractors understand their obligations and accountabilities to contribute to SecureEnergy HSSE culture.
HSSE Operating Standards	The HSSE Operating Standards set out the minimum mandatory performance requirements. Environmental minimum mandatory performance requirements are set out in the following HSSE related Operating Standards: <ul style="list-style-type: none"> • Environment Management Operating Standard; and • Major Accident Event Hazard Management Operating Standard.
HSSE Management Manual	Provides a framework for the HSSE component of the BMS, an overview of the key elements and reference documents.
HSSE Procedures, documents and registers (tools)	Procedures or work practices which provide the detailed steps to be taken to identify risks, work safely, protect the environment, investigate incidents and implement continuous improvement.
HSSE Management Plans – this SEMP	Project specific plans prepared to identify and manage project HSSE risks and achieve the Operating Standards performance requirements.
Project/Site Specific Procedures, Work Instructions	Project and activity specific procedures, risk assessments and work methods to mitigate HSSE hazards. These are prepared by project personnel.

The structure of the environmental management system for the project is shown in Figure 5.1.

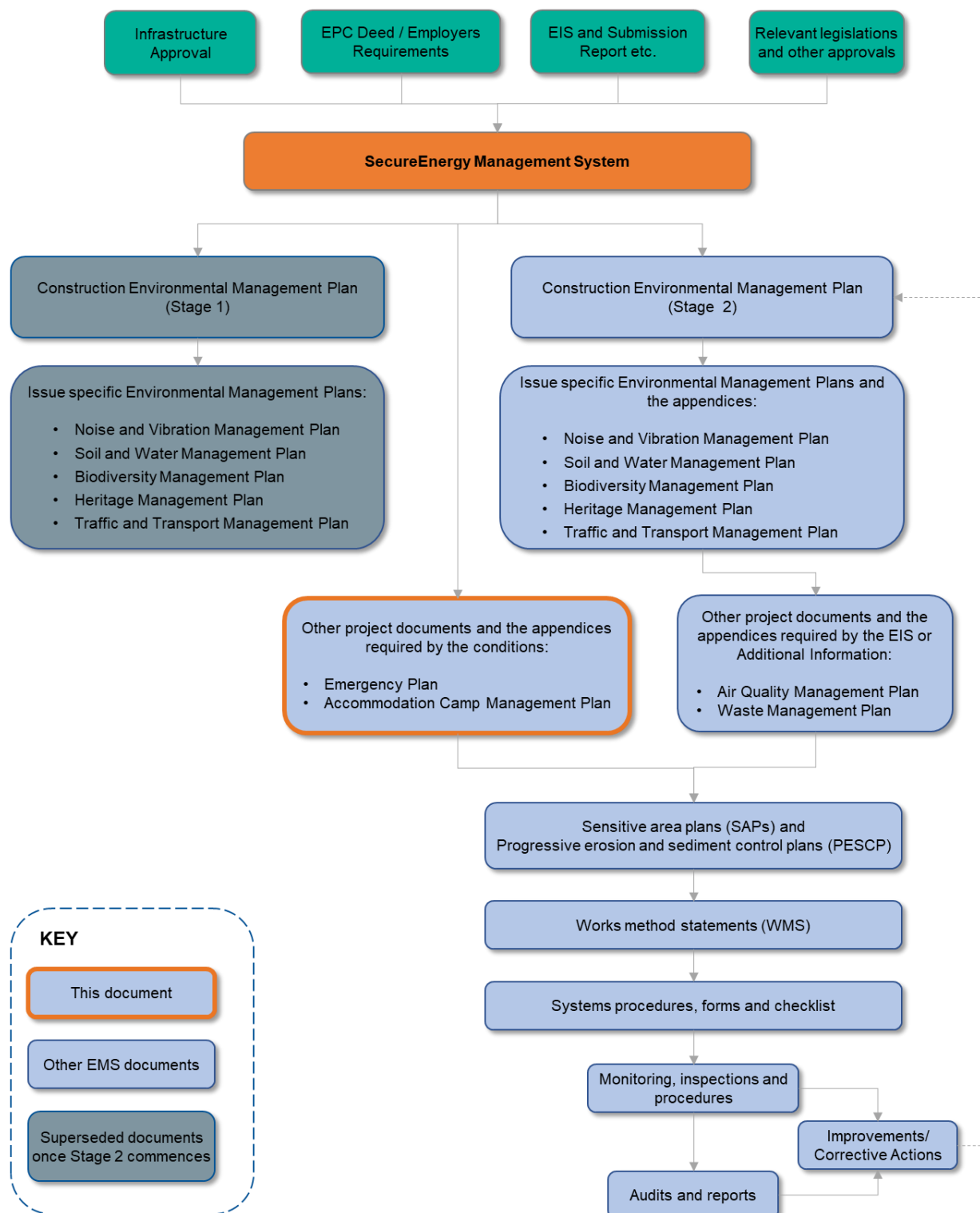


Figure 5.1 - Environmental management framework

5.2 Accommodation Camp Management Plan

This ACMP has been prepared to outline the environmental management practices and procedures that will be implemented during the operation of the accommodation camps at Buronga and Wentworth. The ACMP outlines specific environmental management measures identified to address potential impacts for a range of environmental factors.

5.3 Work packs and work method statements

Work packs describe construction implementation in detail. The preparation of work packs involves a comprehensive review of the requirements of many aspects of project delivery, including design, construction, environment and health and safety. Work packs provide specific instruction on how to construct and undertake certain elements of the project. As required, work packs will incorporate procedures relevant to site-specific activities, to reduce risk and ensure ongoing environmental compliance.

Work method statements (WMSs) are developed as part of the preparation of every Work Pack. WMSs set out the construction methodology for a particular activity or set of activities, specific to the project and incorporate work-specific environmental hazard assessments. WMSs are the document tools to transform the relevant management measures in this ACMP into actions to be implemented during the undertaking of project activities. The WMSs will ensure that location and activity-specific environmental features and risks are managed.

WMSs are typically prepared by the construction team in consultation with the environmental team. The relevant environmental controls and management measures are incorporated into the WMS. The site personnel and sub-contractors involved in the relevant activities will be briefed on the requirements in the WMS prior to the commencement of the works. All construction personnel and sub-contractors undertaking tasks governed by the work packs and WMSs must acknowledge that they have read and understood their obligations prior to commencing work.

5.4 Sensitive Area Plans

A set of sensitive area plans (SAPs) will be prepared to support the identification and appropriate management of key environmental features associated with the project. The SAPs will identify areas/features of environmental and heritage sensitivity and 'no go' zones, and will be included in the project Work Packs to help identify key risk areas, and promote ongoing communication to construction personnel.

Sensitive area plans include information pertaining, but not limited to:

- flora features, including threatened species and endangered ecological communities;
- Aboriginal and non-Aboriginal heritage sites;
- watercourses;
- known fauna habitat to be protected (i.e. hollow bearing trees);
- areas of vegetation to be retained;
- clearing limit boundary; and
- any designated no-go zones.

5.5 Progressive erosion and sediment control plans

Progressive erosion and sediment control plans (PESCPs) will be developed to show the site layout and approximate location of erosion and sediment control structures on-site. PESCPs will be updated as required as sites and associated erosion and sediment control requirements change.

A certified professional in erosion and sediment control will prepare an Erosion and Sediment Control Plan for the project. Environmental staff will then typically develop any PESCPs in consultation with Project Engineers, Superintendents and Supervisors. This will ensure that erosion and sediment control management is incorporated into the planning stage of construction activities and is coordinated in its approach.

The Environmental Manager will approve PESCPs in the first instance. Minor changes thereafter will be approved by environment staff in consultation with the Environmental Manager, as required. PESCPs are designed for use as a practical guide and may be produced in conjunction with work packs or WMSs.

6 Environmental aspects, impacts and risks

The potential environmental impacts associated with the operation of the accommodation camps are described in the following sections.

6.1 Environmental risk assessment

The environmental aspects of key construction activities and associated potential impacts will be continually identified, assessed and controlled throughout the project and included within the environmental risk register. The environmental aspect and impact register, provided in Appendix C, will form a part of the consolidated risk register managed and reported in accordance with the *Risk Management Plan* (45860-QM-PL-G-1002).

The ongoing determination of environmental aspects and impacts will be achieved through the risk management processes outlined above, which results in the maintenance of a list of environmental risks (aspects and impacts), corresponding risk mitigation strategy and risk ranking for each risk. Each environmental risk is categorised, based on the following:

- the environmental aspect;
- type of potential impact (or consequence); and
- likelihood of occurrence.

SecureEnergy will maintain the project risk register to address risks specific to the scope. Risks will be required to be reviewed on a regular basis and will also be reviewed in response to incidents, changes in legal requirements, change in project scope, findings of inspections and audits and management reviews.

6.2 Biodiversity

Potential impacts on biodiversity during operation of the accommodation camp (including vegetation clearing, grubbing and topsoil stripping) are outlined in the Table 6.1 below.

The Buronga and Wentworth accommodation camps do not impact on any known or recorded threatened ecological communities or threatened flora species.

Potential impacts to unexpected threatened species will be managed in accordance with the environmental management measures identified in Appendix D.

Table 6.1 - Potential impacts on biodiversity

Accommodation camp	Operational aspects
Buronga accommodation camp	<ul style="list-style-type: none"> • Direct impacts: <ul style="list-style-type: none"> – ongoing vegetation trimming for maintenance purposes such as the asset protection zones (APZ).
Wentworth accommodation camp	<ul style="list-style-type: none"> • Indirect impacts: <ul style="list-style-type: none"> – reduced viability of adjacent habitat due to noise, dust or light spill.

6.3 Heritage

The operation of the Buronga and Wentworth accommodation camp sites would not impact on any recorded Aboriginal and non-Aboriginal heritage features/items including artefact scatters or identified PADs.

Potential impacts to unexpected Aboriginal and non-Aboriginal heritage features/items will be managed in accordance with the environmental management measure identified in Appendix D.

6.4 Land use and property

The operation of the accommodation camps will result in the temporary change in the land use of the properties, and may impact upon existing infrastructure such as fences, dams, access tracks or other property infrastructure.

Land will be rehabilitated at the completion of the operation of the camps, where possible or will be retained as is, as agreed with the landowner.

Environmental management measures to minimise impacts to land use and property are identified in Appendix D.

6.5 Landscape character and visual amenity

Operation of the accommodation camps would have temporary impacts on the surrounding landscape character and visual amenity.

Potential impacts on landscape character and visual amenity during operation of the accommodation camps is outlined in the Table 6.2 below.

Table 6.2 - Potential impacts on landscape character and visual amenity

Accommodation camp	Operational aspects
Buronga accommodation camp	<ul style="list-style-type: none"> Utilisation of overhead lighting. The presence of plant and equipment.
Wentworth accommodation camp	

Environmental management measures to minimise impacts on visual amenity are identified in Appendix D.

6.6 Social and economic

The accommodation camps would provide increased opportunities for local workforce participation. The increase in workforce is also likely to increase demand for local goods and services. This may result in certain products or services becoming difficult to access for some residents due to increased costs.

Amenity impacts including noise, vibration, light spill, dust generation and reduced air quality may cause irritation or result in changes in day-to-day activities for surrounding receivers.

Environmental management measures to manage social and economic impacts are identified in Appendix D.

6.7 Hydrology, flooding and water quality

The Wentworth accommodation camp is located within the flood prone land to the north of the Murray River. Renmark Road, which would provide access to the site, is also mapped by the Wentworth Local Environmental Plan as being flood affected. The Wentworth accommodation camp is located away from the main channel of the Murray River but would have the potential to impact local overland flow paths. Additionally, any elements of the accommodation camp may be impacted during a flood event.

The Buronga accommodation camp is unlikely to experience flooding, and the activities proposed in this location are unlikely to affect flood behaviour or exacerbate existing flooding characteristics.

The Buronga and Wentworth accommodation camps will have minor impacts to surface water flow characteristics. Erosion and sediment control measures will be implemented to manage and minimise surface water impacts. Impacts to groundwater are not anticipated as groundwater extraction will not occur at the accommodation camp.

Environmental management measures to minimise hydrology, flooding and water quality impacts are identified in Appendix D.

6.8 Air quality

Particulate matter (dust) and gaseous emissions will be generated from the operation of accommodation camps. Potential direct impacts and the emissions sources are provided in Table 6.3.

Environmental management measures to minimise impact to air quality impacts are identified in Appendix D.

Table 6.3 - Potential impacts on air quality

Accommodation camp	Operational aspects
Buronga accommodation camp	<ul style="list-style-type: none"> Dust emission from vehicle movements. Engine combustion emissions from on-site machinery operation and vehicles travelling within the site. Fugitive emissions such as volatile organic compounds from on-site chemical/fuel storage and handling.
Wentworth accommodation camp	

6.9 Noise and vibration

The closest receivers to the Wentworth accommodation camp are approximately 570m away (Fort Courage Caravan Park and an additional residential receiver). The operation of the Wentworth accommodation camp is predicted to be below the NMLs.

The nearest receivers to Buronga accommodation camp are approximately 1.8km away. Based on the distances to sensitive receivers, no receivers are predicted to be adversely impacted by operation activities during and outside standard construction hours. Operation of the camps would occur 24 hours for 7 days a week.

Environmental management measures to minimise noise and vibration impacts are identified in Appendix D.

6.10 Traffic and access

Access to the Buronga accommodation camp is via Arumpo Road, while the Wentworth accommodation camp is located along Renmark Road with access to the site generally via Renmark Road and the Silver City Highway. There will be minor impacts to the local road network, however, the increases in traffic volumes associated with the operation of the accommodation camps are not likely to significantly impact the efficiency of the local road network.

Environmental management measures to minimise traffic and access impacts are identified in Appendix D.

6.11 Hazard and risk

Hazards and risks to the surrounding community or environment may be associated with the following activities outline in Table 6.4.

Table 6.4 - Potential hazards and risk impacts

Accommodation camp	Operational aspects
Buronga accommodation camp	<ul style="list-style-type: none"> On-site storage, handling and transport of dangerous and hazardous goods, contaminated soils and hazardous waste. Potential bushfire risks.
Wentworth accommodation camp	

Management of bushfire safety is further detailed in Section 7 below. Environmental management measures to manage potential hazards and risks are identified in Appendix D.

In addition, project wide systems and processes including the *Health and Safety Management Plan* (45860-HSE-PL-G-1004) will be implemented prior to the commencement of site operation activities.

6.12 Soils, contamination and groundwater

Operation of the accommodation camps would have temporary impacts on the surrounding soil and groundwater. Potential impacts to soils and groundwater, and potential contamination impacts during the operation of the accommodation camps are outlined in Table 6.5.

Table 6.5 - Potential impacts on soil and groundwater

Accommodation camp	Operational aspects
Buronga accommodation camp	<ul style="list-style-type: none"> Potential for spills and leaks from materials, plant and equipment. Potential for spills and leaks from the operation of the wastewater treatment plants.
Wentworth accommodation camp	

Environmental management measures to manage soils, contamination and groundwater impacts are identified in Appendix D.

6.13 Waste management

The various waste types will be generated during the operation of the accommodation camps ranging from domestic waste to wastewater. Potential waste streams are outlined in Table 6.6.

Table 6.6 - Potential waste streams

Accommodation camp	Operational aspects
Buronga accommodation camp	<ul style="list-style-type: none"> Domestic waste from site personnel including food scraps, glass and plastic bottles, paper and plastic containers. Wastewater which will be processed by the wastewater treatment plant and reused onsite. Waste oils, greases and lubricants from maintenance of plant and equipment.
Wentworth accommodation camp	

Environmental management measures to minimise waste impacts are identified in Appendix D.

7 Environmental management measures

To minimise potential environmental impacts, a range of environmental management measures will be applied and are provided in Appendix D.

The following sections describe the environmental management of key environmental aspects mentioned in condition D52 of the Infrastructure Approval.

7.1 Flooding

As outlined in Section 6.7, the Buronga accommodation camp is not located on flood prone land. The accommodation buildings and associated infrastructure placed within the Buronga accommodation camp site are therefore unlikely to impact or alter the existing flood storage capacity, flow or characteristics beyond the accommodation camp boundary.

As identified in Section 6.7, Wentworth accommodation camp is situated on flood prone land. Detail design is currently exploring options to minimise flood impacts to the site. Options being considered include bunding of camp boundary and/or camp and office structures at Wentworth accommodation camp will be raised to a minimum of 600mm above the levelled ground level. Accommodation buildings and associated infrastructure placed within the Wentworth accommodation camp area are unlikely to impact or alter the existing flood storage capacity, flow or characteristics beyond the accommodation camp boundary.

7.2 Water quality

Cut and fill earthwork activities will be undertaken at both the Buronga and Wentworth accommodation camp site to level the ground and to incorporate a falling grade of approximately 0.5% (up to 1.0%) from the centre of the camp site. This will allow stormwater runoff to flow towards the temporary drainage channels around the boundary of each accommodation camp, and to then be diverted into a temporary sediment basin. The sediment basin will be sized in accordance with the Blue Book, and relevant to the catchment area of each accommodation camp. The incorporation of the sediment basin at each accommodation camp will minimise potential impacts to surface water quality.

The stormwater captured within the sediment basin will be collected via water carts and reused for dust suppression in accordance with the *Dewatering Procedure* (45860-HSE-PR-G-1006). The reuse of stormwater will be in a controlled matter and will consider the factors outlined in Section 7.5.

7.3 Bushfire safety

Design

Buildings within the Buronga and Wentworth accommodation camp will be design and constructed to account for the following:

- comply with the relevant bushfire attack level (BAL) of 12.5 building requirements in the RFS's *Planning for Bushfire Protection 2019*;
- comply with Section 3 and Section 5 of *AS 3959–2018–Construction of Buildings in Bushfire Prone Areas* with a BAL12.5 rating;
- sub-floor space of each building will be enclosed with stainless steel flymesh securely fixed to the external wall/s and buried into the ground (or an equivalent alternative solution that achieves the same level of bushfire risk management in compliance with the AS3959-2018);
- all joints will be overlapped and sealed; and
- installation of security measures such as security fencing and CCTV to monitor the actions of unauthorised persons during the bushfire danger period to minimise the risk of an arson attack being successful. The security measures to be implemented at each key location will be determined using a risk based approach.

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Operation

An asset protection zone (APZ) is a fuel reduced area around buildings or other assets to minimise fire risk and to provide a buffer from bushfire hazards (e.g. patches of native vegetation). APZs create a defensible space to manage the flame, radiant heat and ember exposure to assets and emergency service personnel.

An APZ will be implemented during the establishment of the accommodation camp sites. The APZ will remain in place and be maintained during the operation of the accommodation camp sites until demobilisation of each area. From the commencement of the works and for every bushfire season throughout the project duration, the APZ will be maintained in the following manner:

- an APZ of minimum 50m width will be implemented around the perimeter of occupied buildings unless an alternative fire protection approach that achieves the same level of bushfire risk management is identified by a suitably qualified bushfire specialist;
- the APZs will be regularly maintained to a maximum grass height of 100mm-150mm during the bushfire danger period (1 October to 31 March annually) or when the grassland fuel reaches 70 per cent cured; and
- vegetation inside the accommodation camp sites will be regularly maintained to a maximum height of 75mm.

The respective accommodation camp supervisor is responsible for the management and maintenance of the APZ for their area. This will also be supported through visual inspections undertaken by the Environment Manager or delegate.

Flammable chemicals are another key aspect to manage to minimise fire risk during the operation of the accommodation camp. The inappropriate storage of incompatible or flammable chemicals has the potential to result in chemical fire or explosion. The storage and maintenance of flammable material will be in accordance with the safety data sheet given by the manufacturers or importers. Hazards and risk will be identified through a risk assessment form and where hazards are identified, the risk shall be reduced as far as practicable through the preferred order of control methods (hierarchy of controls) as follows:

- Elimination - removing the hazard or hazardous work practice from the workplace so it is no longer present - the most preferred and most effective measure;
- Substitution - substituting or replacing the purchase/use of a hazardous chemical with a compatible less hazardous chemical;
- Isolation - isolating or separating the hazard or hazardous work practice from those not involved in the work, or the general work areas;
- Engineering - modifications to storage methodology or providing guarding, to prevent contact with the hazard or hazardous work practice, and increasing ventilation to reduce any inhalation or skin exposure to a hazardous substance;
- Administrative - making changes to procurement strategy to reduce the duration and quantity of storage or make changes to timing of procurement so incompatible chemicals are not stored concurrently; and
- Personal Protective Equipment - providing employees with suitable personal protective equipment to minimise body contact with the hazard. This measure is a last resort and should be used in circumstances where other methods of control are not practicable - it is the least preferred measure.

As such the following management measures will be implemented during storage:

- the chemicals should be stored in a secure area to limit unauthorised access;
- all chemicals should be managed and stored in accordance with safety data sheet requirements to reduce the risk of fire starting;

- store incompatible chemicals in separate storage areas if possible. Otherwise incompatible chemicals are to be separated with adequate spacing within the same storage areas;
- eliminate any ignition sources near the storage of flammable chemicals where possible. Otherwise provide adequate spacing, non-flammable covers or screens between potential ignition source and flammable chemicals; and
- no hot work (grinding, heating, welding etc.) near the flammable liquid storage areas so far as reasonably practicable, or otherwise provide non-flammable covers or screens to control sparks and flash.

The bushfire and fire response procedure provided in Figure 7.1 will be implemented in the event there is a fire onsite or in the vicinity of the site. It is important to highlight that in the event of a fire, it is critical to remain calm and not to panic or shout. Where safe to do so, rescue and/or help any people in immediate danger. Personnel should only carry out the procedure if safe to do so.

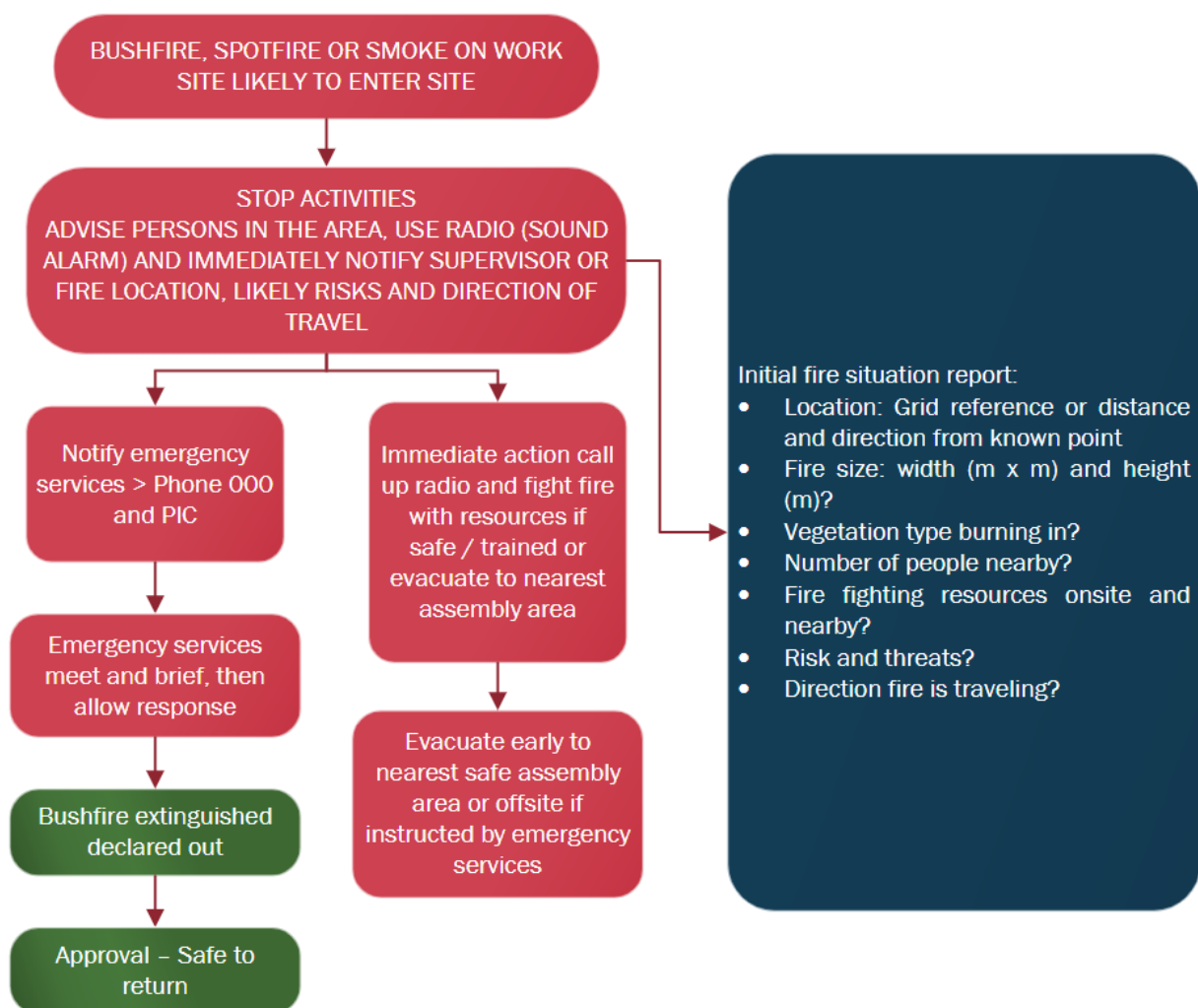


Figure 7.1 - Bushfire and fire response procedure

After carrying out the bushfire and fire response procedure, the *HSSE Incident Notification* (45860-HSE-TPL-G-0014) will be followed and if required, the incident will be reported in accordance with Section 8 of the CEMP.

In addition, the following fire-fighting water supplies and resources will be available and maintained at each accommodation camp:

- provision of a dedicated 20,000L water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection; and

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- dedicated firefighting equipment such as fire-fighting hose reels.


Site personnel are not employed as firefighters and are not expected to combat bushfires on-site. However, relevant site supervisory personnel will have the appropriate level of training on how to operate fire extinguishing equipment in a safe and effective manner. In the event of a fire ignition within the accommodation camp, these trained personnel will be capable of providing a rapid response to extinguish minor fires and to prevent escalation to bushfire.

In the event of a fire emergency during the operation of the accommodation camp, the Person In Charge (PIC) or their delegate will function initially as the Incident Controller (IC) until replaced by responding external fire authority IC, if external emergency service is required. The replacement will occur on the arrival of the external fire authority IC and following a handover briefing.

The IC shall ensure the necessary parties are notified of existing bushfire in accordance with Table 7.1. In the event of ignition on site, the IC shall consider the deployment of trained personnel to provide a rapid response attack if safe to do so.

Site personnel will assist the local RFS, FRNSW and other emergency services, where safe to do so, as much as practicable and reasonable if there is a fire in the vicinity of the accommodation camp. Site personnel would firstly provide rapid response to extinguish any minor fires in the vicinity of the accommodation camp, if capable and under a safe environment. If site personnel are unable to, or should they feel unsafe in extinguishing the fire, the site personnel will contact and report the observation of the fire to appropriate emergency services. Table 7.1 presents the emergency and stakeholders contact details within the project vicinity.

Table 7.1 - Emergency and stakeholder contact details

Emergency Contacts		
IN AN EMERGENCY and FOR ALL FIRES: DIAL 000 (TRIPLE ZERO)		
Secondary Emergency Call from Mobiles: Dial 112		
DO NOT CALL 000 FOR INFORMATION OR ADVICE. CALLING 000 UNNECESSARILY MAY PUT OTHERS WHO ARE IN A GENUINE EMERGENCY SITUATION AT RISK.		
All emergencies including bushfires	Dial 000	
SecureEnergy Site Personnel		
Project Director	Phone: TBA	Email: TBA
HSSE Manager	Phone: TBA	Email: TBA
Environmental Manager	Phone: TBA	Email: TBA
NSW RFS		
NSW RFS – current fire information	https://www.rfs.nsw.gov.au/fire-information/fires-near-me	
NSW RFS Bush Fire Information Line	1800 NSW RFS (1800 679 737)	
Stakeholders (to be notified in the event of a fire)		
Transgrid (emergencies)	1800 027 253	
NSW RFS Lower Western	03 5027 4422	
Other information (non-emergency)		
NSW Police Wentworth (not 24 hours)	03 5027 3102	
NSW Ambulance	131 233	
State Emergency Service	132 500	

7.4 Wastewater treatment plants

As water is a valuable resource within Western NSW, the project will reuse wastewater produced from the sewage treatment plants as part of the construction processes to minimise the volume taken from other local sources.

Wastewater treatment plants (WWTPs) would be established at the Buronga accommodation camp and the Wentworth accommodation camp to manage the respective wastewater generated. The WWTPs will manage wastewater from the facilities such as toilets, bathroom sinks, kitchen sinks, showers and other suitable wastewater sources.

The WWTPs will be designed to accommodate the proposed number of project personnel at each camp. While the volumes of water to be treated will be dependent on the occupancies and associated volume of water use.

The typical treatment process would consist of the following stages:

- collection of raw wastewaters through use of pumps;
- primary screens;
- discharge to equalisation/flow balance tank (to offer flow buffering);
- effluent pumped at a controlled rate to fill the treatment system;
- disinfection process;
- treated water tank; and
- waste tank.

The WWTPs would either be a membrane bio reactor or a sequencing batch reactor. Current design of the proposed WWTP includes the use of a four step disinfection process which includes biological treatment, membrane bioreactor filtration, chlorination, pH control and storage. Further details regarding the treatment processes and plant configurations will be finalised during detailed design.

The WWTPs will be designed and operated to produce treated wastewater that meets the requirement for dust suppression and other construction related activities. The treated wastewater quality will be treated to comply with the relevant Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) *Australian and New Zealand Guidelines for Fresh and Marine Water Quality* guidelines for irrigation water.

The *Recycled Water - Guidance Document, Recycled Water Management Systems (DPI, 2015)* provides guidance on the development of a recycled water management system (RWMS). A RWMS system is a collection of documents, procedures, processes, data and other activities and records that support the safe use of recycled water. Section 2.4 of the guideline describes how a recycled water supplier might develop a RWMS for a new WWTP. The process for developing a RWMS will depend upon the individual recycled water supplier. The recommended steps for developing a recycled water management system for new plant are:

- stage 1: Early engagement;
- stage 2: Concept development;
- stage 3: Risk assessment and mitigation;
- stage 4: Develop recycled water management system; and
- stage 5: Approval.

The project has undertaken early engagement (stage 1) and detailed design (stage 2 to 4) of the WWTP. The WWTP will be designed to meet the treated wastewater quality objectives outlined in Table 7.2. The treated wastewater quality objectives will be measured in terms of physical and chemical parameters. The wastewater quality objectives were adopted primarily from Natural Resource Management Ministerial Council et al. (2006) and ANZECC and ARMCANZ (2000). The adopted water quality objectives were taken from the irrigation section of the respective guidelines. The treated wastewater quality objectives is subject to change as detailed design of the WWTP progress and to meet the required guidelines. Water quality objectives as provided in Table 7.2 are to be met prior to reusing the treated wastewater.

Table 7.2 - Treated wastewater quality objectives

Parameter	Units	Water quality criteria for reuse
pH	pH units	6.5 – 9
Biochemical oxygen demand	mg/L	20
E coli	cfu/100 ml	1,000
Total suspended solids	mg/L	30
Total Nitrogen	mg/L	25 -125
Total Phosphorous	mg/L	12

The supplier will prepare the necessary documents and procedures to obtain approval (stage 5) from the local government as part of their agreed service.

Validation and verification monitoring generally occur during the commissioning phase. Validation monitoring will be undertaken to confirm that the WWTP operates safely and to the expectations of the design. Verification monitoring will be undertaken to ensure that wastewater is treated to the desired water quality required. Ultimately, monitoring undertaken during commissioning is used to determine whether the control of the WWTP are effective and whether the RWMS is being implemented appropriately.

The supplier will operation and maintain the WWTPs during the construction of the project. A wastewater treatment plant maintenance manual will be prepared for the WWTPs. The manual will outline the operation and maintenance procedure to properly and safely maintain the quality of the treated wastewater so that it meets the requirements for dust suppression and other construction related activities. The manual will include a monitoring program and incident response procedures to avoid, minimise and manage accidental spills or other incidents that impact the function of the treatment plants.

The monitoring program will consist of a combination of daily sampling and monthly sampling to ensure the WWTP meets the requirements set out in Table 7.2. The monthly samples will be taken from WWTP and transported to a NATA accredited laboratory for testing. Daily sampling will be undertaken via online monitoring equipment which will take reading on daily basis and recorded in the logbook.

It is important to note that the following section on wastewater and turkey's nests (or storage ponds) is not to be confused with the requirements for sediment basins and water captured from other construction areas which are outlined in the *Dewatering Procedure* (45860-HSE-PR-G-1006).

The wastewater treatment systems will discharge into turkey's nests situated at each camp site in the vicinity of the WWTPs. Prior to reuse, the wastewater released from the WWTPs should meet the water quality objectives provided in Table 7.2. **Error! Reference source not found..** The turkey's nests may also be used for the storage of raw water sourced from offsite water supply points. The nominated water supply points are outlined in Section 2.6 of the *Soil and Water Management Plan* (45860-HSE-PL-D-0008).

Generally, treated wastewater will be loaded into a watercart vehicle and transported to the intended usage site. Treated wastewater will be reused in various construction activities such as, but not limited to, dust suppression within the accommodation camp and throughout the project corridor (including at transmission tower pad areas, onto and adjacent to access tracks, unsealed roads, and unsealed areas in construction compounds and accommodation camps), soil compaction, wheel wash, vehicle washdown areas. Section 7.5 below outlines the reuse of treated wastewater for dust suppression within the accommodation camp.

7.5 Dust suppression

To reduce waste disposal and resource use, SecureEnergy proposes to reuse as much treated wastewater as possible. During operation of the accommodation camps, the project will reuse treated wastewater for dust suppression within the accommodation camp where necessary. The treated

wastewater will also be reused in various construction activities as described in Section 6 of the *Dewatering Procedure* (45860-HSE-PR-G-1006) such as dust suppression throughout the project corridor, soil compaction, wheel wash, vehicle washdown areas and for site restoration.

Although the *Public Health Act 2010* does not specifically address water quality for dust suppression, the responsibility to ensure public health from the Act is considered. The objectives of the *Public Health Act 2010* are to protect and promote public health, control the risk to public health, prevent the spread, control and monitor of infectious diseases and to recognise the role of local governments in protecting public health. The Act primarily focuses on drinking water for human consumption and skin penetration activities. The treated wastewater will not be reused for human consumption or skin penetration activities.

As outlined in Section 7.4, a wastewater treatment plant maintenance manual will be prepared to ensure that appropriate operation and maintenance of the WWTP such that the treated wastewater meets the required water quality criteria. The following factors will be considered prior to the application of treated wastewater to land within the accommodation camp and throughout the project:

- the respective water quality criteria has been met;
- consideration of the existing soil surface condition (and infiltration) when determining the application rate per hour;
- the application area is 40m clear of sensitive receiving environments such as waterways and farm dams;
- no use of water in close-proximity to sensitive areas (such as fauna burrows, threatened flora and endangered ecological communities) or areas of contamination;
- water is not to be irrigated near food crops or food crop pastures;
- existing environmental aspects such as salinity or flood prone areas;
- the likelihood of potential runoff at the application areas; and
- previous and upcoming climatic and weather conditions.

Onsite management measures to suppress dust generation are provided as management measures (MM) 10 to MM13 of Appendix D.

8 Communication and complaints management

SecureEnergy and Transgrid are committed to ensuring effective communication is undertaken on a regular basis at all levels of the project. A high level of communication is an important factor in the successful and correct delivery of environmental outcomes on the project and it will ensure environmental performance is continually communicated, understood and improved.

8.1 Internal communication

The methods of internal (on-site) communication will include:

- inductions;
- toolbox talks;
- pre-start meetings;
- alerts and/or bulletins; and
- Work Packs.

All personnel (including sub-contractors) will be 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 ACMP and to ensure the implementation of environmental management measures. The SecureEnergy Environmental Manager (or delegate) will prepare the environmental component of the site induction.

8.2 External communication

A *Community Communication Strategy* (CCS) (45860-CM-PL-G-1001) has been prepared for the project. The CCS provides a framework in the management of community and stakeholder communication and engagement. The CCS identifies the community engagement objectives, the people and organisations that will be consulted with, the delivery framework and potential issues the project needs to manage during project delivery.

The CCS also provides information on the communication tools and protocols which will support implementation, and descriptions of how community stakeholders will be kept informed of, and consulted about, the project throughout the delivery phase.

Communication tools which will be used by the project to inform stakeholders and the community will include but not be limited to:

- notifications of construction activities;
- notification of out of hours works (as required);
- written correspondence (letters/emails);
- advertisements (as required);
- newsletters;
- meetings;
- the project website which is located at <https://www.projectenergyconnect.com.au>; and
- enquiries and complaints line (24 hour) on 1800 560 577.

8.3 Engagement of local suppliers

One of the most encouraging developments in supply chain management have been the concerted effort to incorporate local content into major infrastructure projects. From a community perspective, the participation of local businesses in infrastructure projects is a means by which economic benefits can flow into their communities. A *Local Business and Employment Strategy* (45860-CM-PL-G-1002)

will be developed prior to construction and will consider the local market conditions and capacity. The Local Business and Employment Strategy will include initiatives for:

- local supplier and labour procurement targets;
- local Aboriginal workforce and business participation;
- training and upskilling programs for local labour force; and
- programs to inform local businesses of contracting opportunities and requirements.

The Local Business and Employment Strategy will be implemented to guide local opportunities during the operation and maintenance of the accommodation camps.

8.4 Complaints management

8.4.1 Complaints

The protocol for managing and reporting any complaints is described in the *Enquiries, Complaint and Dispute Resolution Management Procedure* (45860-CON-PR-G-1001) provided in the CCS. The procedure includes a complaints management process which outlines how SecureEnergy will respond to complaints related to the project.

The complaints management process will use the Consultation Manager database to record information on complaints received about the project during construction.

The key principles of the complaint management process is provided in Table 8.1 below. Refer to the CCS for further details.

Table 8.1 - Key principles for effective complaint and dispute resolution

Action	Description
Acknowledge	SecureEnergy staff should respect the communities' right to voice their concerns. All complaints received should be acknowledged to the complainant either by telephone or in writing.
Resolve	SecureEnergy staff should aim at first contact resolution for all community concerns. SecureEnergy staff should investigate community concerns in detail before negotiating a resolution. All SecureEnergy staff should use their relevant discretions to achieve a mutually acceptable resolution to complaints.
Escalate	All SecureEnergy staff should aim to escalate the complaint if the community member remains dissatisfied with the investigation and/or resolution offered by their first point of contact at SecureEnergy. All complaints where community request to speak to a higher-level representative, should also be escalated.
Record	SecureEnergy staff should aim through the Engagement Team at recording all relevant information, on the community account in Consultation Manager System, regarding customer concerns along with details of all discussions had with the community member in the process of investigating and/resolving the complaint. Detailed information on the resolutions offered to address community concerns should also be clearly recorded.
Communicate	SecureEnergy staff should remain in constant touch with the community member while their concerns are being investigated. The community member should be informed of all steps of the investigation and the resulting outcome at appropriate times.
Report	SecureEnergy should report on all complaints received to the SecureEnergy Management Team and Transgrid. The reporting should include information on the number as well as type of complaints being received, the status of these complaints from time to time and the resulting outcomes or resolutions offered to close them.
Feedback	The SecureEnergy Engagement Team should aim at regular and intensive reviews to identify possible trends in the complaints being received. These reviews should be aimed at highlighting improvements required to avoid complaints being repeated.
Action	SecureEnergy should aim at effective implementation of improvements suggested directly by the community or highlighted by complaint trends.

The complaints management system will include a process to manage complaints including receiving, recording, tracking and responding to complaints within a defined timeframe. If a complaint cannot be responded to immediately, a follow up phone call or verbal response will be made to the complainant in accordance with the timeframes detailed below.

The key processes involved in recording complaints and enquiries are as follows:

- all enquiries/complaints will be recorded in a complaint register;
- complaints received for the duration of the project will be acknowledged verbally within 2 hours from the time of complaint unless the complainant agrees otherwise. Any complaints received out of hours will be responded to on the next working day;
- complaints received via email will be acknowledged within 24 hours; and
- complaints received via letters will be acknowledged within 5 days of receipt. Where a phone number or email address is supplied, a response will be provided within 24 hours.

The community and stakeholder engagement staff will attend to enquiries and complaints received through the enquiries and complaints 1800 information line, project email address, from letters mailed to the project team, during community meetings or through construction/site staff.

The project enquiries and complaints 1800 number will be included on project communications, including notifications, advertisements, and on the SecureEnergy website.

All complaints will be investigated and dealt with impartially. All correspondence, agreements, resolutions and other relevant information will be recorded in Consultation Manager. The complaints register will be sent to the Environmental Representative on any day a complaint is received. If a complainant is not satisfied with the resolution provided, the complaint can be escalated, and alternative offers of resolution can be discussed.

8.4.2 Dispute resolution

Wherever possible, complaints will be resolved directly between SecureEnergy and the stakeholder.

If a complaints management process has been followed and the issue cannot be resolved the *Enquiries, Complaint and Dispute Resolution Management Procedure* (45860-CON-PR-G-1001) provides a flowchart that outlines the process to manage and escalate complaints. As part of this procedure, a Community Complaints Mediator will be engaged to address any complaint where a member of the public is not satisfied by SecureEnergy's response. The escalated review process will include an assessment of the details of the complaint received, any findings of the investigation undertaken in response to the complaint, and any further matters raised by the complainant.

If a complaint requires referral to senior management and Transgrid, the complainant will be informed of this and the outcome of the review process.

9 Incidents and emergencies

9.1 Emergency preparedness and emergency response

Emergency management and planning including environmental emergencies will be undertaken in accordance with the Clough management system and relevant procedures. In line with the Clough management system, a three-tiered approach will be adopted for major incidents:

- Level 1 – on-site emergencies will be in accordance with the *Project Specific Emergency Preparedness and Response Plan* (45860-HSE-PL-G-1015);
- Level 2 – emergency situations where response exceeds the capacity of site resources incidents will be coordinated by the Incident Coordination Team in accordance with *Major Incident Coordination Plan* (CORP-HSE-PL-G-0002); and
- Level 3 – an emergency situation where the incident has the potential to, or has impacted, the business in terms of, reputation, and commercial liability. Incidents will be supported by the Major Incident Management Team in accordance with *Major Incident Management Plan* (CORP-HSE-PL-G- 0001).

9.2 Environmental incidents

In the event of an environmental incident, the Incident, Notification and Investigation Procedure Flowchart provided in Appendix E will be implemented. The flowchart applies to:

- incidents causing harm to the environment (in excess of predicted impacts described and assessed in the EIS, Submissions Report and Amendment Report);
- incidents resulting in non-compliance with approvals, licences, permits, consents and other legislative requirements; and
- near misses including high potential incidents and/or hazards.

Environmental incidents may include the following events caused by the works:

- chemical spills and leaks (including hydrocarbons);
- accidental spills or other incidents associated with the wastewater treatment plants;
- unauthorised discharge of contaminated waters to the environment;
- clearing or damage to vegetation outside of the designated clearing areas;
- unauthorised/unapproved damage or interference to threatened species, endangered ecological communities or critical habitat;
- unauthorised death or injury of native fauna;
- any non-compliance with legislation; and
- inappropriate waste disposal.

All efforts will be undertaken to avoid and reduce impacts of incidents. All site personnel are authorised to suspend a work activity that is likely to cause or actually causing or contributing to an incident. A supervisor/manager may request additional staff be deployed to the site to provide additional capacity or capability to manage the incident.

9.3 Incident notification and reporting

All environmental incidents that occur on the project, regardless of how minor, must be reported to a supervisor by personnel involved or witnesses to the incident immediately after the incident occurs. The Environmental Manager will be notified immediately of any environmental incident. The Environmental Manager will confirm whether the incident has caused or threatens material environmental harm under the POEO Act.

Transgrid will be notified of incidents and near misses immediately. Formal, documented reporting of incidents will be completed using InControl, and will be submitted to Transgrid in accordance with requirements under the Contract.

If required, all external communication and reporting to the community and stakeholders will be in accordance with the CCS.

9.3.1 Incident notification and reporting in accordance with the Infrastructure Approval

An incident is defined in the Infrastructure Approval as ‘*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*’. In addition, material harm is defined in the Infrastructure Approval as the following:

[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).*

This definition excludes “harm” that is authorised under either this approval or any other statutory approval.

The protocol for managing and reporting incidents will be in accordance with condition E6 and Appendix 3 of the Infrastructure Approval. As such, Transgrid will notify DPIE via the Major Projects website immediately after becoming aware that an incident has occurred. A written notification will then be provided to DPIE via the Major Projects website within seven days after becoming aware of the incident. SecureEnergy will provide the appropriate details to assist Transgrid. The written notification will include the following details:

- identify the development and application number;
- provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- identify how the incident was detected;
- identify when the Proponent became aware of the incident;
- identify any actual or potential non-compliance with conditions of consent;
- describe what immediate steps were taken in relation to the incident;
- identify further action(s) that will be taken in relation to the incident; and
- identify a development contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred, or as otherwise agreed by the Planning Secretary, Transgrid will provide DPIE and any relevant public authorities with a detailed report on the incident addressing the following requirements, and any further reports that may be requested:

- 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.

9.3.2 Incident notification and reporting in accordance with the EPBC Act

SecureEnergy will notify Transgrid of any event that impacts or has the potential to impact upon protected matters, as defined under the EPBC Act, immediately on becoming aware of the occurrence. Appropriate details will be provided to assist Transgrid in notifying DAWE in accordance with the requirement of the EPBC Act.

9.3.3 Incident notification and reporting in accordance with the POEO Act

SecureEnergy will notify Transgrid immediately after becoming aware of pollution incidents that causes or threatens material environmental harm to the environment.

Following initial verbal notification to Transgrid, SecureEnergy will notify the NSW Environmental Protection Authority (NSW EPA) immediately, via the EPA pollution hotline:

- 131 555; and
- (02) 9995 5555 if calling from outside NSW.

The circumstances where this will take place include:

- if the actual or potential harm to the health or safety of human beings or ecosystems is not trivial; and
- if actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds \$10,000.

Any incidents that present an immediate threat to human health or property are to be reported immediately to 000.

9.3.4 InControl Data Entry

All incident notifications and investigations shall be entered into the incident management system (InControl). This system shall also act as the Incident Register and allows the project to monitor and analyse incident trends. <http://inx.australia.corp.clough.com/InControl/Default.aspx>

10 Compliance management

10.1 Monitoring

Monitoring will be undertaken to validate the impacts predicted for the project and to measure the effectiveness of environmental controls are address in Table 10.1.

Table 10.1 - Monitoring program

Activity	Description	Frequency	Responsibility	Record
Access point inspections	Visual inspections of road conditions, safety and traffic signage at the access point of each accommodation camp.	Daily	Supervisors	Report by exception in Daily Diary
Vegetation level in APZs	Visual inspections of grass height within APZs to ensure APZ grass height is maintained at 100mm-150mm during the bushfire danger period or when the grassland fuel reaches 70 per cent cured.	As required during bushfire season	Safety Manager or delegate Camp Manager	Report by exception in Daily Diary
Wastewater treatment plant water quality	Monitoring of the treated water quality against the wastewater quality criteria as provided in Table 7.2.	Daily and monthly	SecureEnergy Environmental Manager or SecureEnergy Camp Manager	Logbook

10.2 Inspections

Weekly inspections will be performed by the Environmental Advisor and documented in a weekly environmental checklist. A weekly checklist for environmental inspections will be developed, with the purpose of the checklist to:

- provide a surveillance tool to ensure that safeguards are being implemented;
- assess and document the effectiveness of implemented environmental management measures;
- identify where problems might be occurring;
- identify where sound environmental practices are not being implemented; and
- facilitate the identification and early resolution of problems.

Deficiencies and required actions will be analysed and prioritised at the completion of the inspection and timeframes for implementation of corrective actions agreed. Any non-conformances identified through the checklist process will be highlighted and an environmental inspection report (minor issues) or an environmental incident report completed.

SecureEnergy environmental staff undertake regular inspections of works sites, and in particular critical activities throughout the construction and operation of the accommodation camp. Inspections would typically occur on a fortnightly basis depending on the complexity and anticipated risks associated with the works.

The proposed inspection schedule is provided in Table 10.2

Table 10.2 - Inspection schedule

Activity	Frequency	Location	Responsibility	Record
Pre-start equipment inspections	Daily	The equipment/machinery being used	Equipment/ machinery operators	Pre-start checklist

Activity	Frequency	Location	Responsibility	Record
Environmental site inspection	Weekly	Accommodation camp	SecureEnergy Environmental Manager and SecureEnergy Camp Manager	Site inspection checklist
Joint environmental site inspection	As required.	Accommodation camp	Transgrid, SecureEnergy Environmental Manager and SecureEnergy Camp Manager	Transgrid inspection report

10.3 Auditing

The purpose of auditing is to assess compliance with the Infrastructure Approval and any relevant legal and other requirements (e.g. licences, permits, regulations, contract documentation) and to form a part of continuous improvement described in Section 1.7.

In accordance with condition E11 of the Infrastructure Approval, independent audits will be undertaken in accordance with the *Independent Audit Post Approval Requirements* (2020). An independent audit will be undertaken within 12 weeks from the commencement of construction, followed by six-monthly intervals for each subsequent audit until the completion of the construction phase of the project. The independent audits will address any of the relevant approval requirements, and as determined by the independent auditor, may include an audit of this ACMP.

The independent audits will be undertaken in accordance with the requirements set out in Section 3 of the *Independent Audit Post Approval Requirements* (2020). At the end of each audit, the auditor is to prepare an independent audit report. The report includes details such as the audit methodology, audit findings and recommendations and opportunities for improvement. SecureEnergy will review the draft report and provide a response of the audit findings. If the audit findings identifies any non-compliance, the nominated action and completion timing of the action will be provided as part of the response to each non-compliance.

The submission of the independent audit report and SecureEnergy's response to the audit findings will be submitted to the Department no later than two months from the date of the independent audit site inspection.

10.4 Reporting non-compliances

10.4.1 Reporting non-compliances in accordance with the Infrastructure Approval

Non-compliance is defined in Infrastructure Approval as '*an occurrence, set of circumstances or development that is a breach of this approval*'. The procedure to respond to any non-compliance will be in accordance with condition E7 of the Infrastructure Approval. As such, the Planning Secretary will be notified in writing via the Major Projects website within seven days after Transgrid becomes aware of any non-compliance. SecureEnergy will provide the appropriate details to assist Transgrid. The written notification will include details such as:

- the non-compliance;
- the reasons for the non-compliance (if known); and
- what actions have been taken, or will be taken, to address the non-compliance.

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

10.4.2 Reporting non-compliances in accordance with the EPBC Act

SecureEnergy will notify Transgrid of any event that impacts or has the potential to impact upon protected matters, as defined under the EPBC Act, immediately on becoming aware of the occurrence. Appropriate details will be provided to assist Transgrid in notifying DAWE in accordance with the requirement of the EPBC Act. Transgrid will notify DAWE in writing of any non-compliance with the conditions or commitments made in plans as defined under the EPBC Act Approval.

10.4.3 Other reporting and notification requirements

SecureEnergy is required to prepare and submit various reports to Transgrid and/or the Department and to undertake reporting required under the Infrastructure Approval. A summary of these reports is provided in Table 10.3.

Table 10.3 - Other reporting requirements

No	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report	For incorporation in project Monthly Reports.	Monthly	SecureEnergy Environmental Manager	Transgrid
2	Incident Report	Provide a report on the incident within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary.	30 days after the incident has occurred	SecureEnergy/ Transgrid	DPIE
3	Non-compliance notification	Planning Secretary must be notified within 7 days after identifying the non-compliance.	As required	SecureEnergy/ Transgrid	DPIE
4	Independent audit report	As per the reporting requirements in the <i>Independent Audit Post Approval Requirements</i> (2020).	Within 12 months of the commencement of construction and at six-monthly intervals for subsequent reports.	SecureEnergy/ Transgrid	DPIE

11 Non-conformance, corrective and preventative action

A non-compliance is the failure to comply with the requirements of this ACMP and associated documents such as Infrastructure Approval and relative legislations.

A non-conformance is the failure to meet the procedural requirements and processes developed for the project such as work packs and WMS, or internal permits that forms part of the environmental management system.

Where a non-conformance or non-compliance has been identified, corrective actions will be developed as required and implemented to address the non-conformance that occurred. In addition, preventative actions will be developed as required and implemented to minimise the potential for recurrence. In the event of a non-conformance the following will occur:

- the nature of the event will be investigated by the Environmental Manager;
- the effectiveness of existing controls, or the need for new/additional controls will be reviewed;
- appropriate preventative and corrective actions will be developed and implemented; and
- the relevant environmental management practices and procedures implemented for the construction/operation will be reviewed and revised.

Corrective and preventative actions may be generated from a number of sources, including but not limited to incident investigations, audits and management reviews. The actions will be systematically managed in accordance with the Clough management system to ensure that the required actions are tracked and closed out in a timely manner.

The action records will include details on the source of the action (e.g. audit, inspection or other), the action required, target close out date, actual close out date and the person responsible for the action item.

If the actions require changes to the ACMP, the update will occur as described in Section 1.8.

12 Contingency plan

Although the project has been assessed through the environmental impact assessment process and potential impacts identified, unpredicted impacts may occur as the project progresses. In the event that unexpected impacts are identified, the action or cause will be categorised and as required will be managed as:

- an emergency or environmental incident in accordance with Section 9 of the ACMP – Incidents and emergencies; and/or
- a non-compliance or non-conformance in accordance with Section 11 of the ACMP – Non-compliance, non-conformance, corrective and preventative action.

Reporting of the unpredicted impacts would be in line with the above processes and as described in Section 10.4 of the ACMP – Reporting non-compliances.

Through the identification of corrective and/or preventative actions via the above processes, the following steps will be considered:

- a) determine the relevant impact assessment criterion/criteria, below which the impact should be reduced, consistent with the requirements of this ACMP;
- b) identify options to reduce the unexpected impacts to below the relevant criterion/criteria and appropriate timeframe for implementation;
- c) implement the selected measure(s) to reduce the unexpected impacts; and
- d) identify and implement an appropriate monitoring program to determine the effectiveness of the selected measure(s) to reduce the unexpected impact.

If the above monitoring program identifies that the unexpected impacts have not been reduced to below the nominated criterion/criteria, items b) to d) of the contingency process will be repeated.

This section does not apply to unexpected biodiversity, heritage and contamination finds. These will be managed in accordance with the relevant Unexpected Finds Procedure included in Appendix F of this ACMP.

Appendix A – Relevant legislation

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
Commonwealth legislation					
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Protection of areas and objects	Section 10	Comply with any declarations relating to the project area	No declarations have been made relating to the project area. In the event that declarations are made, this ACMP will be updated if required.	Not applicable
		Section 20	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy
<i>Native Title Act 1994</i>	Native Title Land	All	Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.	The project area intersects with the Barkandji Traditional Owners #8 (Part A) native title area (determined). Barkandji Traditional Owners will be included in consultation and archaeological survey for the project.	Transgrid SecureEnergy
New South Wales legislation					
<i>State Environmental Planning Policy (State and Regional Development) 2011</i>	All	Part 3 Clause 13	Declaration of critical State Significant Infrastructure	On 29 August 2019 the NSW Minister for Planning and Public Spaces declared EnergyConnect critical State significant infrastructure (CSSI) under the <i>State Environmental Planning Policy (State and Regional Development) 2011</i> on the basis that it is critical to the State for environmental, economic or social reasons. The project may be carried out without development consent under Part 4 of the EP&A Act, however application for approval of the CSSI is required.	Transgrid
<i>Environmental Planning and Assessment Act 1979 (EP&A Act)</i>	All	Section 5.5	A determining authority has the duty to fully consider the environmental impact (including Aboriginal or non-Aboriginal heritage) of an activity and is required to 'take into account the fullest extent possible all matters affecting, or likely to affect the environment' arising from the proposal.	The <i>EnergyConnect (NSW - Western Section) - Environmental Impact Statement</i> was submitted to Department of Planning, Industry and Environment in October 2020 and publicly exhibited between 26 September 2019 and 10 December 2020. On 14 April 2021, the response to submissions was finalised in the <i>EnergyConnect (NSW - Western Section) – Submissions Report</i> . A separate <i>EnergyConnect (NSW - Western Section) – Amendment Report</i> , to document design changes and additional environmental assessment undertaken, was also finalised on 14 April 2021. Transgrid prepared and provided a memorandum titled <i>EnergyConnect (NSW – Western Section) Response to</i>	Transgrid

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Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				DPIE Request for Information – 7 May 2021 and subsequent discussions to DPIE on the 10 August 2021 in response to DPIE requested additional information (EnergyConnect (NSW – Western Section)(SSI-10040) Request for Additional Information).	
		Section 5.19	Approval of the Minister required to carry out critical State significant infrastructure (CSSI). Comply with the conditions of the Infrastructure Approval and generally in accordance with the revised mitigation measures from the Response to DPIE Request for Information.	The project requires approval from the NSW Minister for Planning and Public Spaces under Division 5.2, Part 5 of the EP&A Act. The project was assessed as above. Approval for EnergyConnect (NSW - Western Section) was granted by the Minister for Planning and Public Spaces.	Transgrid
<i>National Parks and Wildlife Act 1974 (NP&W Act)</i>	Aboriginal places and objects	Part 6 Division 1 Clause 89A	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	Yes, notification requirements are detailed in the Unexpected Heritage Finds Procedure.	SecureEnergy
<i>Biodiversity Conservation Act 2016 (BC Act)</i>	Flora and Fauna	All	Legislation responsible for the conservation of biodiversity in NSW through the protection of threatened flora and fauna species, populations and Endangered Ecological Communities (EECs). The Biodiversity Conservation Act 2016, together with the Biodiversity Conservation Regulation 2017, established the Biodiversity Offsets Scheme which is outlined below.	The biodiversity impacts of the project have been assessed in accordance with the BC Act, which includes the Biodiversity Assessment Method (BAM) and documented in a Biodiversity Development Assessment Report (BDAR).	Transgrid
		Part 6 Division 1 Clause 6.2	This Act, and the <i>Biodiversity Conservation Regulation 2017</i> , outlines the framework for addressing impacts on biodiversity from development and clearing. Biodiversity Offsets Scheme is a framework to avoid, minimise and offset impacts on biodiversity from development and clearing, and to ensure land that is used to offset impacts is secured in-perpetuity.	As part of the assessment under the BC Act, the biodiversity offset credits has been estimated for the project and are outlined in the BDAR. Biodiversity Offset Credits is applicable for clearing on the project. Transgrid as the proponent will retire the full biodiversity offset credit liability of the development.	Transgrid
<i>Local Land Services Act 2013</i>	Clearing of native vegetation in regulated rural areas	Part 5A Division 3 Clause 60N and	Clause 60N details the offence to clears native vegetation in a regulated rural area. Clause 60O details the planning approval and authorisation for clearing native vegetation in a regulated rural area.	Yes, as detailed 60O(b) of the Act, approval and authorisation for clearing native vegetation in a regulated rural area is subject to approval of the project under Part 5 of the EP&A Act. Infrastructure Approval will satisfy this compliance requirement.	Transgrid

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Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
		Clause 60O			
<i>Rural Fires Act 1997</i>	Bushfire prone land	Section 100B	Bush fire safety authorities	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 100B of <i>Rural Fires Act 1997</i> does not apply.	Not applicable
<i>Protection of the Environment Operations (Waste) Regulation 2005</i>	Waste and transportation	Part 4	Comply with record keeping requirements in relation to the transport of certain types of waste.	Yes, the relevant management measures have been incorporated within Appendix D	SecureEnergy
<i>Contaminated Land Management Act 1997</i>	Reporting contamination	Section 60	Duty to report contamination.	Yes, if project activities have caused land contamination, or a landowner becomes aware of land that is contaminated, there is a legal duty under section 60 of the <i>Contaminated Land Management Act 1997</i> to notify the EPA.	SecureEnergy
<i>Protection of the Environment Operations Act 1997 (POEO Act)</i>	Harming the environment	Section 115 Section 116 Section 117	Do not risk harming the environment by wilfully or negligently: <ul style="list-style-type: none"> disposing of waste unlawfully. causing any substance to leak, spill or otherwise escape (whether or not from a container); or causing any controlled substance to be emitted into the atmosphere.	Yes, the relevant management measures have been incorporated within Appendix D	SecureEnergy
	Notification of pollution incidents	Section 148	Notify the EPA immediately of pollution incidents where material harm to the environment is caused or threatened.	Yes, notification requirements are detailed in Section 9.3	SecureEnergy
	Plant maintenance and operation	Section 139	Do not operate plant if it emits noise caused by failure to maintain or operate the plan in a proper and efficient manner.	Yes, the relevant management measures have been incorporated within Appendix D	SecureEnergy
	Control equipment	Section 167	Properly and efficiently maintain and operate any installed pollution control equipment (including monitoring devices).	Yes, the relevant management measures have been incorporated within Appendix D	SecureEnergy
	Waste and transportation	Section 143	Only transport waste to a facility that can lawfully accept the waste.	Section 143 Notices are to be obtained for waste that is sent to a facility/premise.	SecureEnergy

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Appendix B – Revised mitigation measures

Reference	Revised mitigation measures	Applicable locations (from RMMs)	Where addressed	How addressed
Biodiversity				
B14	Training on biodiversity management practices and the requirements for the project will be provided to all relevant project personnel, including relevant subcontractors, through inductions, toolbox talks and targeted training. Construction workforce will be supplied with sensitive area maps (showing clearing boundaries and exclusion zones), including updates as required.	All locations	MM1	Sensitive area plans will be prepared to include clearing boundary, exclusion zones and location of threatened species. Sensitive area plans will be issued to the relevant site personnel.
B18	A species unexpected finds protocol will be implemented if threatened ecological communities, flora and fauna species, not assessed in the biodiversity assessment, are identified in the disturbance area.	All locations	MM2	If an unexpected threatened species find is discovered, the Unexpected Threatened Species Procedure will be followed.
Aboriginal heritage				
AH10	If at any time during construction, any items of potential Aboriginal archaeological or cultural heritage significance, or human remains are discovered, they will be managed in accordance with the Aboriginal heritage unexpected finds protocol (refer to Appendix 2 of the <i>Non-Aboriginal and Aboriginal Cultural Assessment Report</i> (Navin, 2021)).	All locations	MM3 and MM4	If an unexpected heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.
Non-Aboriginal heritage				
NAH3	If at any time during construction, any items of potential non-Aboriginal archaeological significance, or human remains are discovered, they will be managed in accordance with the non-Aboriginal unexpected finds protocol (refer to Appendix 2 of the <i>Non-Aboriginal & Aboriginal Cultural Heritage Assessment Report</i> (Navin, 2021)).	All locations	MM3 and MM4	If an unexpected heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.

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Reference	Revised mitigation measures	Applicable locations (from RMMs)	Where addressed	How addressed
Land use and property				
LP7	<p>Biosecurity controls will be implemented during construction to minimise the risk of off-site transport or spread of disease, pests or weeds. Controls will include (but not limited to):</p> <ul style="list-style-type: none"> • inspections and cleaning of vehicles, machinery, and personnel equipment prior to movement on and off the construction work areas or between properties • minimising movements across adjoining farmland including trip numbers and locations • additional measures where localised areas of high biosecurity risks have been identified. <p>The specific controls applicable to a property will be identified in consultation with the affected landholder. The effectiveness of these controls will be regularly monitored.</p>	All locations	MM5	<i>Biosecurity Management Plan</i> (45860-HSE-PLN-D-0032) have been prepared and outlines biosecurity controls to minimise the risk of off-site transportation or spread of weeds.
LP8	Where present, weeds will be managed in consultation with Western Local Land Services (LLS), Wentworth Shire Council and NSW Department of Primary Industries.	All locations	MM5	Western Local Land Services, Wentworth Shire Council and NSW Department of Primary Industries will be consulted if weeds are present within the accommodation camp area
LP9	In the event of new infestations of notifiable weeds as a result of construction activities, the relevant control authority will be notified as per Biosecurity Act 2015 and Biosecurity Regulation 2017.	All locations	MM6	The relevant control authority will be notified in the event of new infestations of notifiable weeds.
Landscape and visual amenity				
LV4	Lighting at construction compound and accommodation camps will be designed and operated in accordance with AS4282-2019 Control of the obtrusive effects of outdoor lighting.	Construction compound and accommodation camps	MM7	Lighting at the accommodation camps will be designed and operated with the relevant sections of <i>AS4282-2019 Control of the obtrusive effects of outdoor lighting</i> .

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Reference	Revised mitigation measures	Applicable locations (from RMMs)	Where addressed	How addressed
Social and economic				
SE3	<p>A Local Business and Employment Strategy will be implemented to guide local opportunities during construction, and where possible, align with existing plans and strategies of Wentworth Shire Council and Mildura Rural City Council, and Transgrid's Reconciliation Action Plan. The initiatives will be prepared in consultation with Wentworth Shire Council, Mildura Rural City Council and key community stakeholders and organisations in the region. The strategy will consider local market conditions and capacity, and will include initiatives for:</p> <ul style="list-style-type: none"> • local supplier and labour procurement targets • Aboriginal workforce and business participation • training and upskilling programs for local labour force • programs to inform local businesses of contracting opportunities and requirements • consideration of use of available local infrastructure and services for construction activities such as the Wentworth Aerodrome, where feasible • transitioning the local workforce following the completion of construction. 	All locations	MM8	A <i>Local Business and Employment Strategy</i> (45860-CM-PL-G-1002) have been developed and considers the local market conditions and capacity.
Hydrology, flooding and water quality				
HF4	Water supply options and management will be undertaken in accordance with agreements between the construction contractor and Wentworth Shire Council.	All locations	MM9	Discussions with Wentworth Shire Council regarding water supply options have commenced and will be ongoing throughout the project where required.
HF5	<p>Erosion and sediment measures will be implemented in accordance with the principles and requirements in:</p> <ul style="list-style-type: none"> • <i>Managing Urban Stormwater – Soils and Construction, Volume 1</i> (Landcom 2004), and <i>Volumes 2A and 2C</i> (NSW Department of Environment, Climate Change and Water 2008), commonly referred to as the 'Blue Book' • <i>Best Practice Erosion and Sediment Control</i> (IESCA – 2008) • Transgrid's <i>HSE Guideline</i> • <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRA 2018). 	All locations	MM38	<p>Progressive Erosion and Sediment Control Plan (PESCPs) will be prepared, as required, in line with the Blue Book, IESCA 2008 and the relevant Transgrid HSE Guidelines.</p> <p><i>Guidelines for Controlled Activities on Waterfront Land</i> was not applied as the accommodation camps are not situated near waterfront land.</p>

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Reference	Revised mitigation measures	Applicable locations (from RMMs)	Where addressed	How addressed
Noise and vibration				
NV4	Further engagement and consultation with affected receivers will be carried out to understand their preferences for mitigation and management measures where exceedances of noise management levels are predicted. Based on this consultation, appropriate mitigation and management options will be considered and implemented where feasible and reasonable to minimise the impacts.	All locations	MM19	Consultation with the affected receivers will be undertaken to understand their preference for mitigation if noise exceedances is predicted.
Traffic				
TA8	Access to properties for emergency vehicles will be provided at all times.	All locations	MM20	Access to properties for emergency vehicles will be provided.
Air quality				
AQ1	<p>Air quality management measures will be detailed in the Air Quality Management Plan and implemented during construction to minimise particulate and gaseous emissions as far as possible. Measures include (but are not limited to):</p> <ul style="list-style-type: none"> • use of water sprays or dust suppression surfactants as required for dust suppression where required and appropriate • adjusting the intensity of activities based on observed dust levels and weather forecasts • vehicle movements to be limited to designated entry/exit routes and parking areas, and measures to minimise the tracking of material onto paved roads • stabilising disturbed areas as soon as practicable, including new access routes • minimising the extent of disturbance as far as practicable • regularly conducting visual inspections of dust emissions and applying additional controls as required. 	All locations	MM10 to MM13	<p>An <i>Air Quality Management Plan</i> (45860-HSE-PL-D-0020) have been prepared and details air quality management measures to be implemented for the project.</p> <p>The relevant management measures to minimise air quality impacts is provided in MM10 to MM13 of Appendix B.</p>
AQ2	Ensure that all vehicles and machinery are fitted with appropriate emission control equipment and maintained in a proper and efficient manner.	All locations	MM14	All vehicles and machinery will be fitted with and maintain the appropriate emission control equipment.

Reference	Revised mitigation measures	Applicable locations (from RMMs)	Where addressed	How addressed
AQ5	<p>To ensure potential odour emissions from the wastewater treatment plants are minimised, the following additional management measures will be implemented:</p> <ul style="list-style-type: none"> • prevent excessive inorganic material accumulating on the screens by disposing of screened material in waste bins on a regular basis • place waste bins containing screened material and sludge as far away as practicable from the construction compound and accommodation sites • ensure waste bins are fully closed at all times • remove screened material and sludge from site at regular intervals and dispose in an appropriate manner. 	Buronga substation and Wentworth construction compound and accommodation sites	MM15 to MM18	The relevant management measures to minimise potential odour emissions from the wastewater treatment plants is provided in MM15 to MM18 of Appendix B.
Hazard and risk				
HR2	<p>A minimum 50m wide managed Asset Protection Zone will be provided to the hazard perimeter of the fixed construction equipment and camp site buildings unless an alternative fire protection approach that achieves the same level of bushfire risk management is identified by a suitably qualified specialist during detailed design.</p> <p>Any Asset Protection Zone will be regularly maintained to provide a maximum grass height of 100mm -150mm during the prescribed Bushfire Danger Period and when the grassland fuel reaches 70 per cent cured.</p> <p>Vegetation inside the main construction compounds and accommodation camp sites will be regularly maintained to a maximum height of 75mm.</p>	Main construction compounds and accommodation camps	Section 7.3 MM22 and MM23	Bushfire risk management measures, particularly in relation to asset protection zones are detailed in Section 7.3 and provided in MM22 to MM36 in Appendix D.
HR3	Buildings within the construction compound and camp site will be constructed to comply with Section 3 and Section 5 (BAL 12.5) of A.S. 3959 – 2018 – ‘Construction of Buildings in Bushfire Prone Areas’. The sub-floor space of each building will be enclosed with stainless steel flymesh securely fixed to the external wall/s and buried into the ground. All joints will be overlapped and sealed.	Main construction compounds and accommodation camps	Section 7.3 MM24	Bushfire risk management measures, particularly in relation to BAL12.5 design requirement are detailed in Section 7.3 and provided in MM22 to MM36 in Appendix D.
HR4	Water for fire-fighting operations will be confirmed during detailed design with consideration to occupancy density and site layout. This will include onsite static water supply and fire-fighting hose reels. All weather access having a minimum width of 4 metres will be provided to the static water supply tanks.	Main construction compounds and accommodation camps	Section 7.3 MM25 and MM26	Bushfire risk management measures, particularly in relation to dedicated firefighting equipment are detailed in Section 7.3 and provided in MM22 to MM36 in Appendix D.
HR5	Consultation with emergency services, including the Rural Fire Service and Fire and Rescue NSW will be undertaken during detailed design to ensure emergency access provisions are provided during operation.	All locations	Section 7.3 MM27	Bushfire risk management measures, particularly in relation to consultation with emergency services are detailed in Section 7.3 and provided in MM22 to MM36 in Appendix D.

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Reference	Revised mitigation measures	Applicable locations (from RMMs)	Where addressed	How addressed
HR6	Prior to the occupation of the construction camps and offices, all bush fire protection and mitigation measures would be certified as compliant with relevant regulatory requirements by a suitably qualified bush fire consultant.	Main construction compounds and accommodation camps	Section 7.3 MM28	Prior to the occupation of the accommodation camp sites, all bushfire protection management measures will be certified as compliant by a suitably qualified bushfire consultant.
HR7	Shielding will be used and a water supply (nine kilogram water fire extinguisher) and trained operator present during all outdoor hot works/grinding activities, and during vegetation slashing within and adjacent to the construction compound and camp sites. No outdoor hot works will be undertaken during periods of Total Fire Ban and Catastrophic Fire Weather Days unless there is a suitable fire suppression unit present on site and only with prior agreement with local fire services.	All locations	MM29 and MM30	Bushfire risk management measures, particularly in relation to dedicated firefighting equipment and timing of hot work activities are provided in MM22 to MM36 in Appendix D.
HR8	All chemicals, fuels or other hazardous substances will be stored in accordance with the supplier's instructions and relevant legislation, Australian Standards and applicable guidelines. The capacity of any bunded area shall be at least 130 per cent of the largest chemical volume contained within the bunded area. The location of the bunded enclosure/s shall be shown on the site plans.	All locations	Section 7.3 MM31 to MM34	Bushfire risk management measures, particularly in relation to storage of chemicals, fuels or other hazardous substances are detailed in Section 7.3 and provided in MM22 to MM36 in Appendix D.
HR10	Appropriate spill containment equipment will be provided and located at strategic, accessible locations.	All locations	MM35	Spill Response Procedure will be followed if a spill have occurred.
HR11	Security measures will be implemented to minimise the risk of arson within and adjoining construction areas. The location of appropriate security measures will be determined using a risk based approach.	All locations	Section 7.3 MM36	Security fencing and CCTV will be implemented to minimise the risk of arson at the accommodation camps.
HR14	The proposal will be designed, operated and maintained in accordance with Transgrid's Bushfire Risk Management Plan. This includes reduction in fuel loads, management of asset protection zones and inspections of infrastructure.	All locations	MM37	The principles within the Transgrid's Bushfire Risk Management Plan will be considered during the detailed design.
Soils, contamination and groundwater				
SCG12	Construction materials, spoil and waste will be suitably stored to minimise the potential for soil, groundwater or water quality impacts.	All locations	MM39 and MM40	Construction material will be appropriately stored to minimise erosion and sediment-related impacts
SCG13	The discovery of previously unidentified contaminated material will be managed in accordance with a contamination unexpected finds procedure.	All locations	MM41	If an unexpected contaminated material is discovered, the Unexpected Contamination Finds Procedure will be followed.

Reference	Revised mitigation measures	Applicable locations (from RMMs)	Where addressed	How addressed
SCG14	<p>The application of treated wastewater will be managed so that:</p> <ul style="list-style-type: none"> • Application rates account for soil conditions and the protection of water quality (including groundwater). This includes salinity conditions and the prevention of runoff from application areas • buffer distances to sensitive receivers (such as waterways and farm dams) as set out in <i>Designing and Installing On-Site Wastewater Systems</i> (WaterNSW, 2019) are met • climatic conditions are considered during application to ensure treated wastewater is applied to intended areas • equipment used will reflect the management of human, livestock and environmental risks. 	All locations	Section 7.5 MM42	Factors such as water quality, existing soil surface condition and infiltration and existing environmental aspects such as salinity or flood prone areas, clear of sensitive receiving environments, the likelihood of potential runoff at the application areas, and previous and upcoming weather conditions will be considered prior to the application of treated wastewater to land
SCG15	Incident response procedures for wastewater treatment plants (and use of treated wastewater) will be implemented to avoid, minimise and manage accidental spills or other incidents that impact the function of the wastewater treatment plants.	Accommodation camps	MM43	The wastewater treatment plant maintenance manual will include incident response procedures
Waste management and resources				
WM4	All waste will be assessed, classified, managed and disposed of in accordance with the Waste Classification Guidelines (NSW EPA, 2014).	All locations	MM44	All waste to be assessed and classified in accordance with the EPA guideline prior to transportation.
WM5	Waste streams will be segregated to avoid cross contamination of materials and maximise reuse and recycling opportunities.	All locations	MM45	Waste streams will be segregated through the use of separate and dedicated waste bins.
WM6	All waste generated and surplus spoil to be removed from the construction of the proposal will be transported to appropriately licensed waste disposal or transfer facilities or other facilities lawfully able to accept materials.	All locations	MM47	All waste generated which needs to be removed from the project will be transported to appropriately licensed waste disposal or transfer facilities

Appendix C – Environmental aspects and impacts register

No.	Activity	Environmental Aspect	Risk	Cause	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
1	Transport of materials, equipment and personnel	Biodiversity	Frequent injury/mortality of protected fauna	Driving vehicles on access roads during times of high fauna activity. Excessive speed on access roads. Inattention of drivers on potential for fauna impacts.	<ul style="list-style-type: none"> Trigger EPBC Act thresholds for impacts on Commonwealth listed species, Potential regulatory action from agencies Financial penalties Reputational impacts Personal injury due to collision with larger fauna including kangaroos and horses. 	Major	Possible	19 – High	<ul style="list-style-type: none"> Unexpected threatened species find procedure Fauna Handling Procedure 	Moderate	Unlikely	12 – Moderate	SecureEnergy
2	Transport of materials, equipment and personnel	Biosecurity	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	Vehicular movements from disturbed and contaminated areas into undisturbed areas within the project area.	<ul style="list-style-type: none"> Impact to biodiversity in exceedance of the approved Project Spread of weeds/impacts to native vegetation Long term maintenance requirements 	Major	Possible	19 – High	<ul style="list-style-type: none"> Weed and seed inspections Hygiene inspections of vehicle prior to accessing site 	Major	Unlikely	14 – Moderate	SecureEnergy
3	Transport of materials, equipment and personnel	Surface water	Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	Vehicular spills along access road or within Project compounds.	<ul style="list-style-type: none"> Hydrocarbon pollution Potential regulatory action from agencies Financial penalties Reputational impacts 	Major	Possible	19 – High	<ul style="list-style-type: none"> Spill Response Procedure 	Moderate	Unlikely	12 – Moderate	SecureEnergy
4	Transport of materials, equipment and personnel	Air Quality	Visible dust plumes and deposition of dust on surfaces.	Transportation vehicles movements cause dust particle to become airborne and carried in wind to other areas.	<ul style="list-style-type: none"> Excessive dust emission/deposition in surrounding environment Air quality impacts exceed the approved project levels Adverse biodiversity impacts Reputational impacts 	Moderate	Possible	13 - Moderate	<ul style="list-style-type: none"> Implement dust-suppression through use of water cart Cover all loads during transportation 	Moderate	Unlikely	12 – Moderate	SecureEnergy
5	Transport of materials, equipment and personnel	Traffic and Transport	Roadworks on local roads blocking or excessively delaying traffic movements and thoroughfare.	Increased traffic volumes and congestion, increased road noise, degradation of roadways, traffic delays. Heavy and light vehicles moving in convoys through local towns to the project site.	<ul style="list-style-type: none"> Traffic delays on local and regional roads Increased road safety hazard Adverse reputational impacts Increased noise and air quality impacts 	Moderate	Likely	17 – High	<ul style="list-style-type: none"> Traffic Control Plans Engagement with community to manage expectations Community Communication Strategy Manage timing of oversize/ overmass (OSOM) movements 	Minor	Unlikely	6 – Low	SecureEnergy
6	Stockpile/ spoil emplacement	Biodiversity	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	Disturbance of natural areas and storage of spoil provides opportunity for weeds to establish and spread beyond the project area.	<ul style="list-style-type: none"> Impact to biodiversity in exceedance of the approved Project Spread of weeds/impacts to native vegetation Long term maintenance requirements 	Major	Possible	19 – High	<ul style="list-style-type: none"> Work Packs and WMS Sensitive Area Plans 	Major	Unlikely	14 – Moderate	SecureEnergy
7	Storage of hazardous materials	Groundwater	Contamination of groundwater.	Spill or leaks of stored hazardous material dispersing into ground water.	<ul style="list-style-type: none"> Potential for irreparable damage to groundwater quality Long term impacts to groundwater dependent species or ecosystems 	Major	Unlikely	14 – Moderate	<ul style="list-style-type: none"> Bunded areas for storage of fuels and oils Spill Response Procedure 	Moderate	Rare	7 - Low	SecureEnergy
8	Storage/ disposal of hazardous materials	Waste	Contamination of soil and water, unlawful disposal of waste.	Inadequate storage of hazardous materials, inadequate spill management practices, improper disposal practices.	<ul style="list-style-type: none"> Contamination of soil and water in sensitive environment Potential regulatory action from agencies Financial penalties Loss of community support Reputational impacts 	Major	Possible	19 – High	<ul style="list-style-type: none"> Use of licensed disposal contractors Appropriate bunded storage of hazardous materials 	Major	Unlikely	14 – Moderate	SecureEnergy

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No.	Activity	Environmental Aspect	Risk	Cause	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
9	Hot works and plant operations	Bushfire	Ignition of bushfire.	Sparks from machinery or hot work activities ignites combustible vegetation and fire gets out of control.	<ul style="list-style-type: none"> Significant impact to local environment through bushfire Potential destruction of project infrastructure and equipment Potential for fatality/injury to personnel and members of the public Damage to public property and adjacent properties Loss of biodiversity Project delays Significant reputational impact Potential regulatory actions from agencies Financial penalties 	Catastrophic	Likely	24 – Very High	<ul style="list-style-type: none"> Pre position firefighting equipment Safety and emergency systems and procedures Implement preparatory actions of Emergency Plan 	Catastrophic	Unlikely	15 – Moderate	SecureEnergy
10	Inflow of workforce to local area	Socio economic	Business impacts, increased housing demand.	Workforce size relocating to local area.	<ul style="list-style-type: none"> Housing rental/purchase prices increase due to increased demand Local services struggle to meet demands Loss of community support for the project 	Minor	Possible	10 - Moderate	<ul style="list-style-type: none"> Establishment of construction camps to provide accommodation for workforce Encourage personnel to purchase local produce and use local business to stimulate positive economic growth in the locality 	Minor	Unlikely	6 – Low	SecureEnergy
11	Working in bushfire prone areas	Bushfire	Ignition of bushfire.	Siting of temporary infrastructure and personnel in bushfire prone areas without appropriate bushfire mitigation in place.	<ul style="list-style-type: none"> Damage to construction site, works and accommodation camps Project delays Safety impacts 	Moderate	Possible	13 - Moderate	<ul style="list-style-type: none"> Pre position firefighting equipment Safety and emergency systems and procedures Implement preparatory actions of Emergency Plan 	Minor	Unlikely	6 – Low	SecureEnergy

Appendix D – Environmental management measures

ID	Measurement/Requirement	When to implement	Responsibility	Source document
Biodiversity				
MM1	<p>Sensitive area plans will be prepared and will include:</p> <ul style="list-style-type: none"> the location of clearing boundaries; the location of exclusion zones; and the location of threatened flora or vegetation which is to be retained. <p>The sensitive area plans will be issued to relevant site personnel with updates issued as required. Sensitive area plans will be updated based on the results of the pre-clearing surveys</p>	Operation	Environmental Advisor, Environmental Manager	B14
MM2	The <i>Unexpected Threatened Species Finds Procedure</i> provided in Appendix F1 of this plan will be followed if threatened ecological communities and threatened flora and fauna species, not assessed in the biodiversity assessment, are identified in the disturbance area of the accommodation camp.	Operation	All personnel	B18
Aboriginal and non-Aboriginal Heritage				
MM3	If at any time during construction, any potential Aboriginal objects, or human remains or any items of potential non-Aboriginal archaeological significance are discovered, stop all work in the immediate vicinity of the find and notify the Site Supervisor and Environmental Manager.	Operation	All personnel	AH10 and NAH3
MM4	Environmental Manager (or delegate) to notify Transgrid of an unexpected find. SecureEnergy will comply with Instructions from the Employer in proceeding in accordance with the <i>Unexpected Heritage Finds Procedure</i> provided in Appendix F2.	Operation	Transgrid Environmental Manager	AH10 and NAH3
Land use and property				
MM5	<p>The biosecurity controls outlined in the <i>Biosecurity Management Plan</i> (45860-HSE-PLN-D-0032) will be followed during construction to minimise the risk of off-site transport or spread of weeds. Controls will include (but not limited to):</p> <ul style="list-style-type: none"> inspections and cleaning of vehicles, machinery, and personnel equipment prior to movement on and off the construction work areas; and minimising movements across adjoining farmland including trip numbers and locations where possible. <p>Additional measures where localised areas of high biosecurity risks have been identified will be implemented. The effectiveness of these controls will be regularly monitored.</p> <p>Where weeds are present within the disturbance area, weeds will be managed in consultation with Western LLS, Wentworth Shire Council and NSW Department of Primary Industries</p>	Operation	Environmental Manager, Environmental Advisor, Supervisor	LP7 and LP8

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM6	In the event of new infestations of notifiable weeds as a result of construction activities, the relevant control authority will be notified as per <i>Biosecurity Act 2015</i> and <i>Biosecurity Regulation 2017</i> .	Operation	Environmental Manager	LP9
Landscape and visual amenity				
MM7	Lighting at accommodation camps will be designed and operated generally in accordance with <i>AS4282-2019 Control of the obtrusive effects of outdoor lighting</i> .	Detailed design	Supervisor	LV4
Social and economic				
MM8	<p>A <i>Local Business and Employment Strategy</i> (45860-CM-PL-G-1002) will be prepared and will consider the local market conditions and capacity. The Strategy will include initiatives for:</p> <ul style="list-style-type: none"> • local supplier and labour procurement targets; • local Aboriginal workforce and business participation; • training and upskilling programs for local labour force; and • programs to inform local businesses of contracting opportunities and requirements. <p>The Local Business and Employment Strategy will be followed to guide local opportunities during the operation and maintenance of the accommodation camps.</p>	Prior to operation and during operation	Engagement Team	SE3
Hydrology, flooding and water quality				
MM9	Water supply options and management will be undertaken in accordance with agreements with Wentworth Shire Council.	Prior to operation and during operation	Supervisor	HF4
Air quality				
MM10	Exposed and disturbed areas, surfaces and stockpiles, including access tracks, will be managed using dust suppression techniques such as water sprays (from water carts) or dust suppression surfactants, especially during inclement weather conditions where required and appropriate.	Operation	Environmental Advisor, Environmental Manager, Supervisors	AQ1
MM11	Vehicle movements into and out of the project area are to be limited to designated access points. Light vehicles will park in a designated parking area.	Operation	Environmental Advisor, Environmental Manager, Supervisors	AQ1
MM12	Establish measures such as wash bays or rumble grids at the access points as required to minimise dust generation and mud tracking onto paved roads.	Operation	Environmental Advisor, Environmental Manager, Supervisors	AQ1
MM13	Disturbed areas will be stabilised as soon as practicable and feasible to minimise the generation of dust emissions.	Operation	Environmental Advisor, Environmental Manager, Supervisors	AQ1

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM14	All vehicles and machinery will be fitted with appropriate emission control equipment.	Operation	Plant operators, Supervisors	AQ2
MM15	Screened material from wastewater treatment plant/processes will be disposed of in waste bins on a regular basis to prevent excessive inorganic material accumulating on the screens.	Operation	Plant operators, Supervisors	AQ5
MM16	Waste bins containing screened material and sludge from wastewater treatment plant/processes will be placed as far away as practicable from the construction compound and accommodation sites.	Operation	Supervisors	AQ5
MM17	Waste bins will be fully closed at all times when not in use.	Operation	Supervisors	AQ5
MM18	Screened materials and sludge from wastewater treatment plant/processes will be removed from site if required at regular intervals and appropriately disposed of.	Operation	Plant operators, Supervisors	AQ5
Noise and vibration				
MM19	Where exceedances of noise management levels are predicted, consultation with affected receivers (e.g. individual meetings) will occur to understand their preferences for mitigation and management measures. Based on this consultation, appropriate mitigation and management options will be considered and implemented where feasible and reasonable to minimise the impacts.	Operation	Supervisors, Construction Manager, Environmental Manager, Engagement Manager	NV4
Traffic				
MM20	Access to properties will be provided at all times for emergency vehicles.	Operation	Supervisors	TA8
Hazard and risk				
MM21	The bushfire and fire response procedure provided in Figure 7.1 will be implemented in the event there is a fire onsite or in the vicinity of the site. Personnel should only carry out the procedure if safe to do so.	Operation	Supervisor, Project Manager, HSSE team	Condition D46 d)
MM22	A 50m wide asset protection zone will be implemented around the perimeter of occupied buildings at the accommodation camps. Otherwise, consult with a suitably qualified bushfire specialist for alternative fire protection management measures that achieves that same level of bushfire risk management as the APZ.	Prior to operation	Supervisor, Project Manager	HR2
MM23	All asset protection zones will be maintained to a maximum grass height of 100mm -150mm during prescribed Bushfire Danger Period (1 October to 31 March) or when the grassland fuel reaches 70 per cent cured. Grass inside the main construction site compounds and accommodation camp sites will be maintained to a maximum height of 75mm.	Operation	Supervisor, Project Manager, HSSE team	HR2

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM24	Occupied buildings within the accommodation camp sites will be constructed to comply with Section 3 and Section 5 (Bushfire attack level [BAL] 12.5) of A.S. 3959–2018 – <i>Construction of Buildings in Bushfire Prone Areas</i> . The sub-floor space of each building will be enclosed with stainless steel flymesh (or an equivalent alternative solution that achieves the same level of bushfire risk management in compliance with the AS3959-2018) securely fixed to the external wall/s and buried into the ground. All joints will be overlapped and sealed.	Prior to operation	Supervisor, Project Manager	HR3
MM25	Dedicated fire-fighting static water supply and equipment (such as fire-fighting hose reels) will be available at camps.	Operation	Supervisor, Procurement Manager, HSSE team	HR4
MM26	All static water supply tanks will have an all weather access track with a minimum width of 4m.	Prior to operation	Supervisor, HSSE team	HR4
MM27	Provision of emergency access routes are implemented in accordance the detailed design, which takes into account considerations from emergency services, including the Rural Fire Service and Fire and Rescue NSW.	Prior to operation	Environmental Manager, HSSE team	HR5
MM28	Prior to the occupation of the accommodation camp sites, all bushfire protection management measures will be certified as compliant in accordance with relevant regulatory requirements by a suitably qualified bushfire consultant.	Prior to operation	Supervisor, Procurement Manager, HSSE team	HR6
MM29	No outdoor hot works will be undertaken during periods of Total Fire Ban and Catastrophic Fire Weather Days unless there is a suitable fire suppression unit present on site and only with prior agreement with local fire services.	Operation	Supervisor, Environmental Manager, HSSE team	HR7
MM30	The following will be implemented during all outdoor hot works, grinding activities and vegetation slashing within and adjacent to the construction compound and camp sites: <ul style="list-style-type: none"> shielding will be used; a water supply will be present (nine kilogram water fire extinguisher); and a trained operator will be present. 	Operation	Supervisor, HSSE team	HR7
MM31	All chemicals, fuels or other hazardous substances will be stored in accordance with the supplier's instructions, any relevant legislations or Australian Standards or the applicable guidelines.	Operation	Supervisor, Environmental Manager	HR8
MM32	All chemicals, fuels or other hazardous substances shall be banded. The capacity of any banded shall be at least 130 per cent of the largest chemical volume contained within the banded area. The location of the banded enclosure/s shall be shown on the PESCPs.	Operation	Supervisor, HSSE team	HR8
MM33	The following management measures will be implemented during chemical storage: <ul style="list-style-type: none"> the chemicals should be stored in a secure area to limit unauthorised access; all chemicals should be managed and stored in accordance with safety data sheet requirements to reduce the risk of fire starting; 	Operation	Supervisor, HSSE team	Good practice

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
	<ul style="list-style-type: none"> store incompatible chemicals in separate storage areas if possible. Otherwise incompatible chemicals are to be separated with adequate spacing within the same storage areas; eliminate any ignition sources near the storage of flammable chemicals where possible. Otherwise provide adequate spacing, non-flammable covers or screens between potential ignition source and flammable chemicals; and no hot work (grinding, heating, welding etc.) near the flammable liquid storage areas so far as reasonably practicable, or otherwise provide non-flammable covers or screens to control sparks and flash. 			
MM34	In the event of a spill incident of chemicals, fuels or other hazardous substances, the <i>Spill Response Procedure</i> (45860-HSE-PR-G-1004) provided in Appendix F4 will be followed.	Operation	Supervisor, Environmental Manager	HR8
MM35	Appropriate spill containment equipment (i.e. spill kits) will be provided and placed at strategic and accessible locations within the site such as adjacent to chemical storage area, relevant work area and refuelling area.	Operation	Supervisor, Environmental Manager	HR10
MM36	Security measures such as security fencing, CCTV will be implemented to minimise the risk of arson within and adjoining accommodation camps. The level of security measures implemented at each key location will be determined using a risk based approach.	Operation	Supervisor, HSSE team	HR11
MM37	The principles within Transgrid's Bushfire Risk Management Plan will be considered during the detailed design stage.	Detailed design	Engineering Manager	HR14
Soils, contamination and groundwater				
MM38	<p>Progressive Erosion and Sediment Control Plan (PESCPs) will be prepared, as required, in line with the principles and requirements in:</p> <ul style="list-style-type: none"> <i>Managing Urban Stormwater – Soils and Construction, Volume 1</i> (Landcom 2004), commonly referred to as the 'Blue Book'; <i>Managing Urban Stormwater – Soils and Construction, Volumes 2A and 2C</i> (NSW Department of Environment, Climate Change and Water 2008); <i>Best Practice Erosion and Sediment Control</i> (IESCA – 2008); and Relevant Transgrid's HSE Guideline. <p>The PESCPs will outline controls to be implemented for locations where ground disturbance will occur with the aim to minimise soil erosion and movement of sediment and other pollutants to land and/or waters.</p> <p>The PESCPs will be progressively updated throughout the project to reflect the current construction activities occurring on site and to allow the removal of any measures that are ineffective or no longer needed.</p>	Operation	Environmental Advisor, Environmental Manager, Supervisors	SCG9 and HF5

EnergyConnect (NSW – Western Section) Accommodation Camp Management Plan

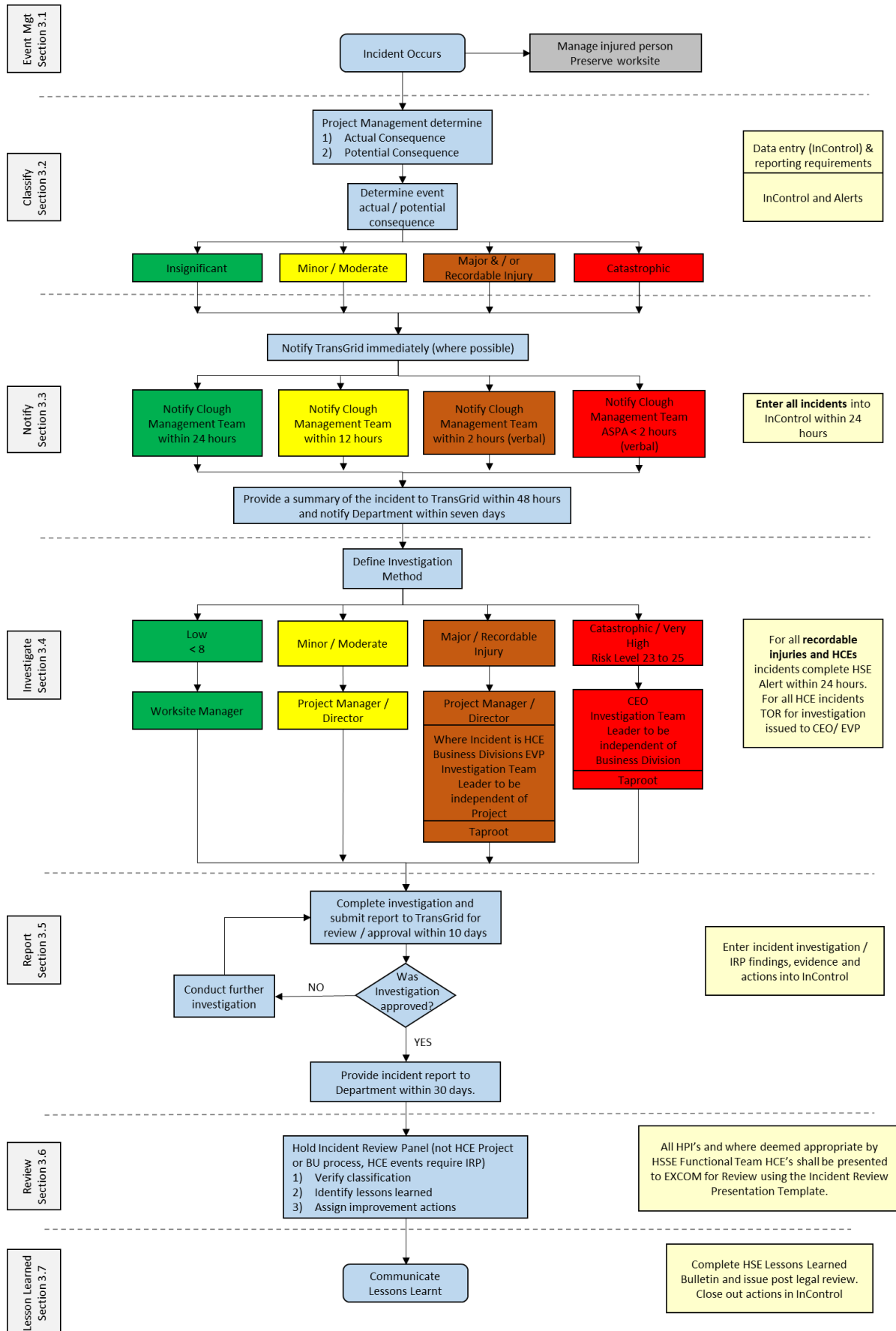
ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM39	Construction materials such as fuels, chemicals, vehicles and equipment will be appropriately stored to minimise the introduction of contaminants to the existing soil, groundwater and surface water runoff.	Operation	Supervisor, Environmental Advisor	SCG12
MM40	Construction materials and spoil will be appropriately stored on site and within the accommodation camp with the aim to minimise erosion and sediment-related impacts in adjacent areas.	Operation	Supervisor, Environmental Manager	SCG12
MM41	Promptly notify the Site Supervisor or Environmental Manager of any suspected or potential unexploded ordnance exposed during construction activities. Cease all work activities within the vicinity of actual or suspected unexploded ordnance find. The <i>Unexpected Contamination Finds Procedure</i> provided in Appendix F3 is to be followed.	Operation	Supervisor, Environmental Advisor, Environmental Manager HSSE team, Transgrid	SCG13
MM42	Prior to the application of treated wastewater to land within the accommodation camp, the following factors will be considered: <ul style="list-style-type: none"> the respective water quality criteria has been met; consideration of the existing soil surface condition (and infiltration) when determining the application rate per hour; the application area is 40m clear of sensitive receiving environments such as waterways and farm dams; no use of water in close-proximity to sensitive areas (such as fauna burrows, threatened flora and endangered ecological communities) or areas of contamination; water is not to be irrigated near food crops or food crop pastures; existing environmental aspects such as salinity or flood prone areas; the likelihood of potential runoff at the application areas; and previous and upcoming climatic and weather conditions. 	Operation	Supervisor, Environmental Advisor, Environmental Manager HSSE team	SCG14
MM43	The wastewater treatment plant maintenance manual will be prepared for the operation and maintenance of the WWTPs. The manual will include a monitoring program and an incident response procedures to avoid, minimise and manage accidental spills or other incidents that impact the function of the treatment plants.	Operation	Supervisor	SCG15
Waste management and resources				
MM44	All waste will be assessed, classified, managed and disposed of in accordance with the <i>Waste Classification Guidelines</i> (NSW EPA, 2014).	Operation	Environmental Manager, Environmental Advisor, Project Engineers	WM4
MM45	Waste streams will be segregated to avoid cross contamination of materials and maximise reuse and recycling opportunities.	Operation	Supervisors	WM5

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM46	Concrete washout areas, where necessary, will be adequately sized and located in a position where wastewater will not enter any drainage lines or waterways. Concrete washout will be regularly maintained and residue collected for potential recycling of concrete waste.	Operation	Environmental Manager, Environmental Advisor,	Good practice
MM47	All waste generated and surplus spoil which needs to be removed from the project will be transported to appropriately licensed waste disposal or transfer facilities, or to a location which is permitted to accept such waste.	Operation	Supervisors, Project Engineers, Environmental Manager, Environmental Advisor	WM6

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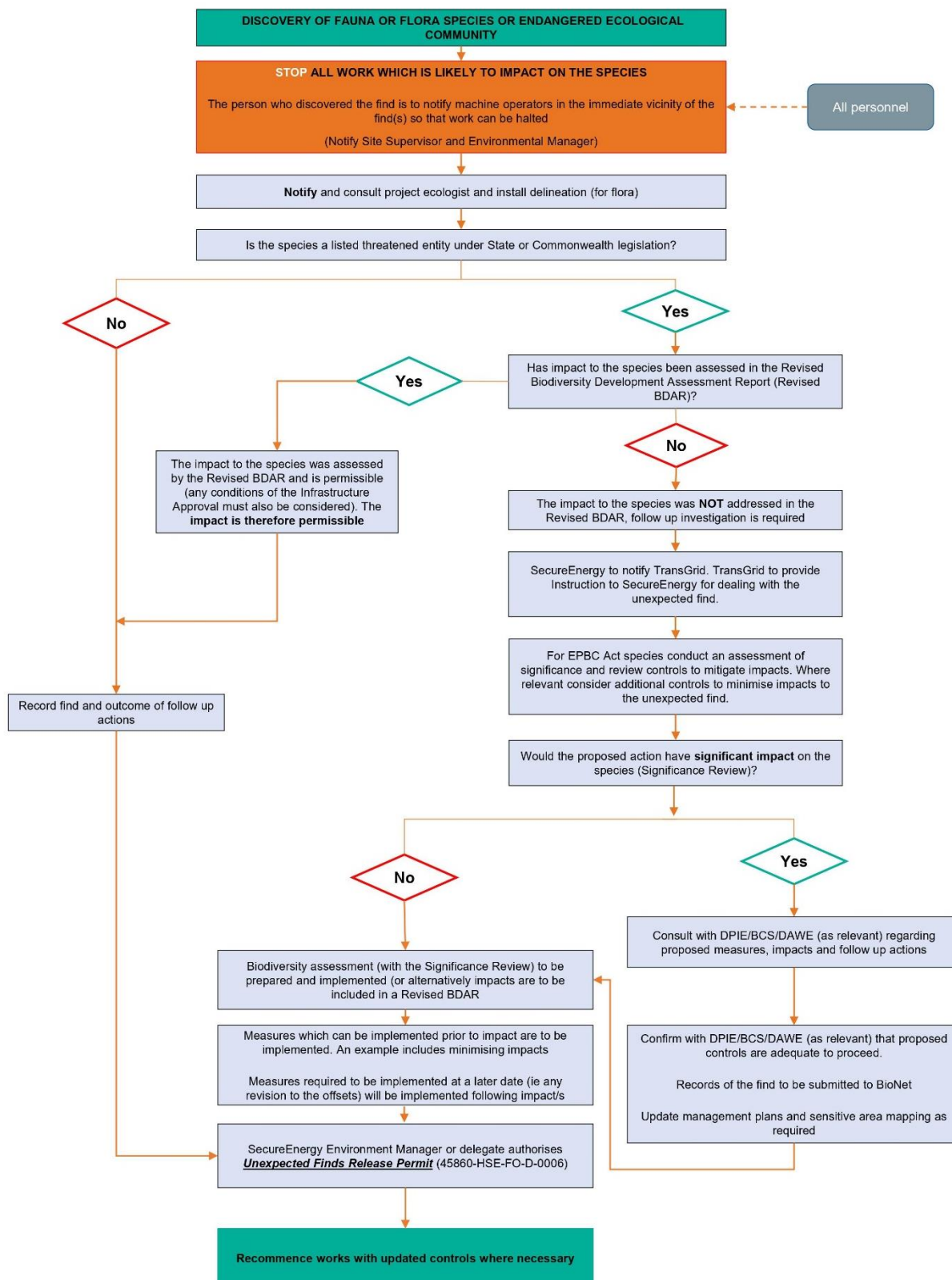
Appendix E – Incident, Notification and Investigation Procedure Flowchart



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Appendix F1 – Unexpected Threatened Species Finds Procedure

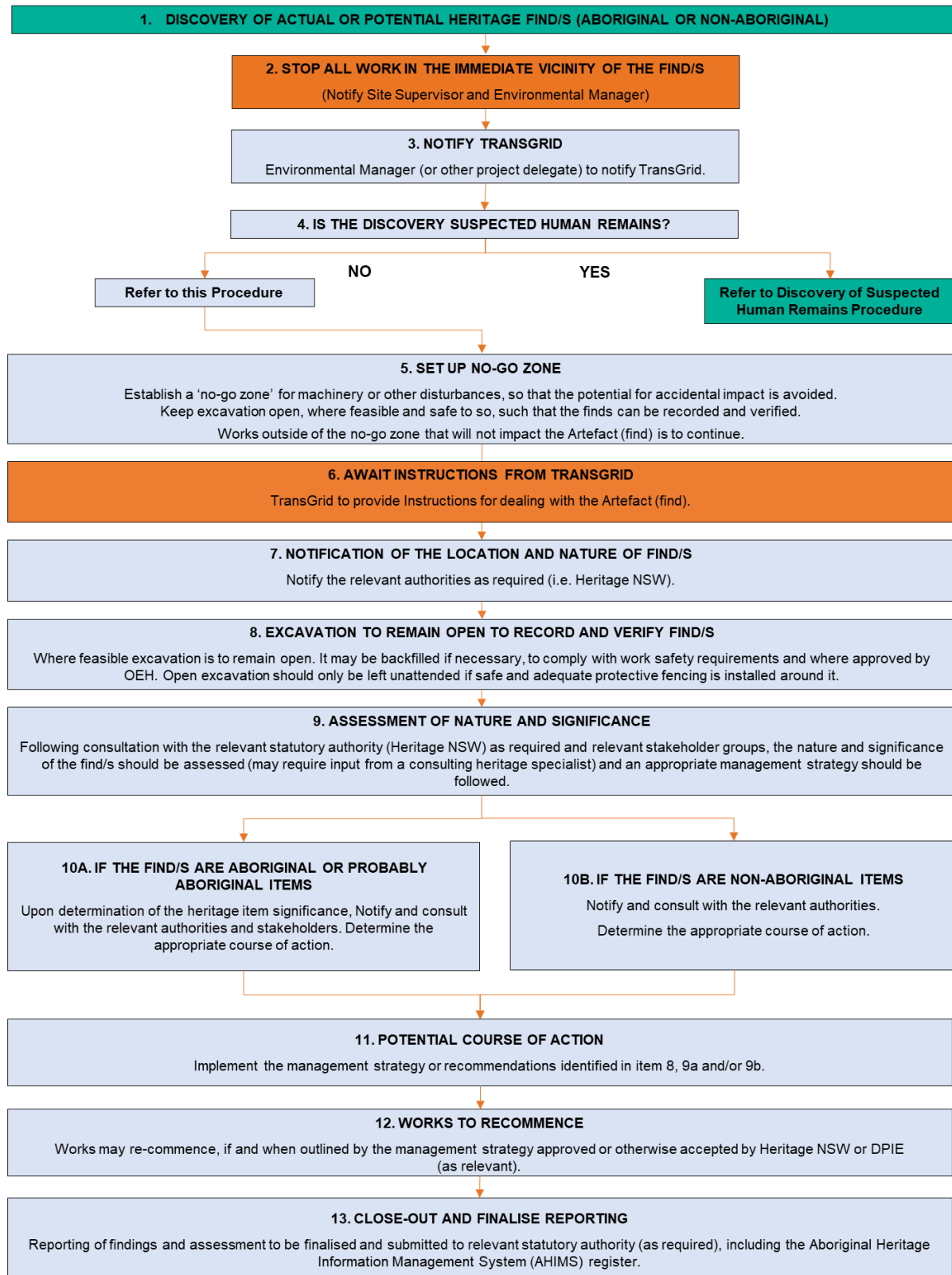
Biodiversity Management Procedure
Unexpected Threatened Species Finds Procedure



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Appendix F2 – Unexpected Heritage Finds Procedure

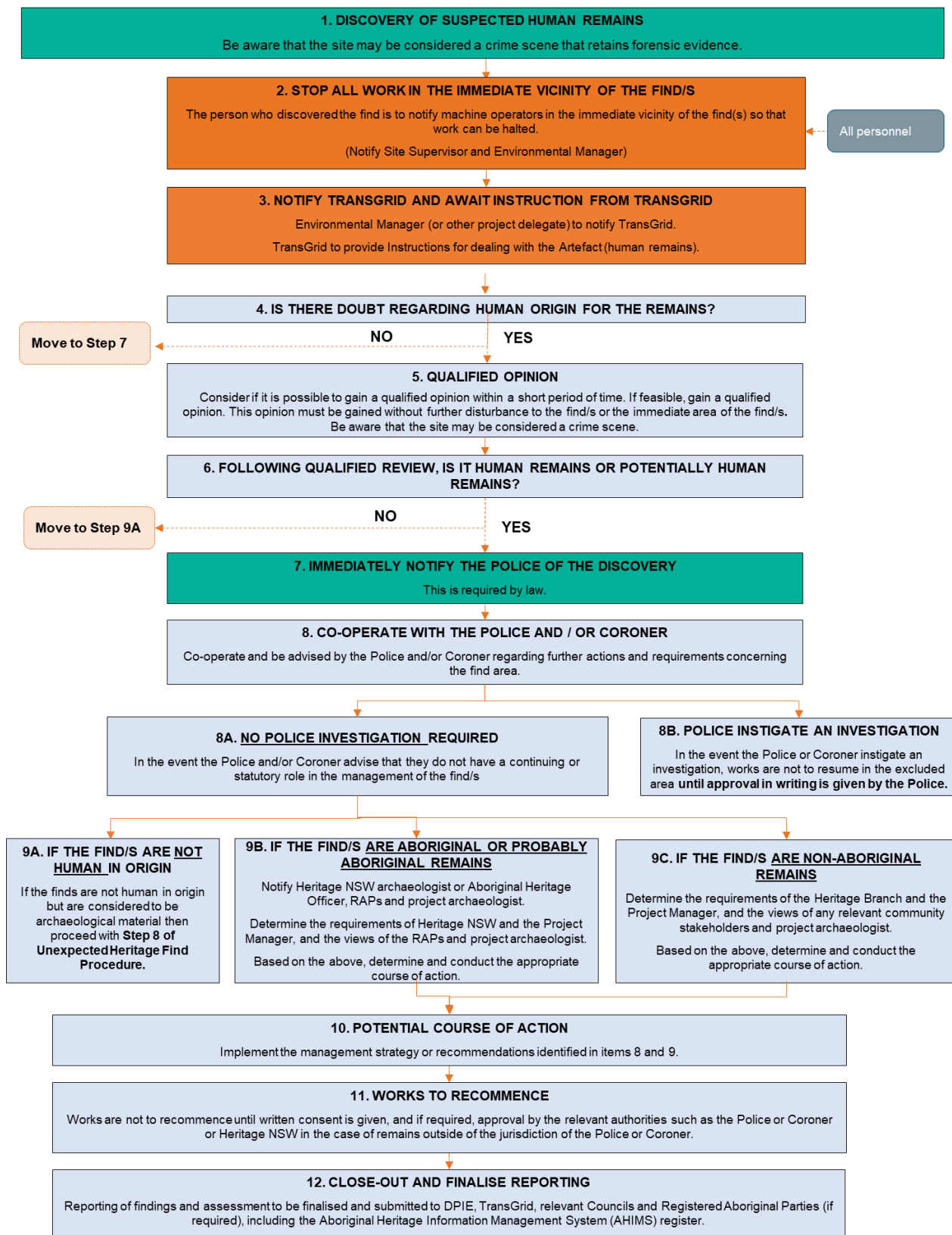
Heritage Management Procedure UNEXPECTED HERITAGE FINDS PROCEDURE



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Heritage Management Procedure

DISCOVERY OF SUSPECTED HUMAN REMAINS PROCEDURE

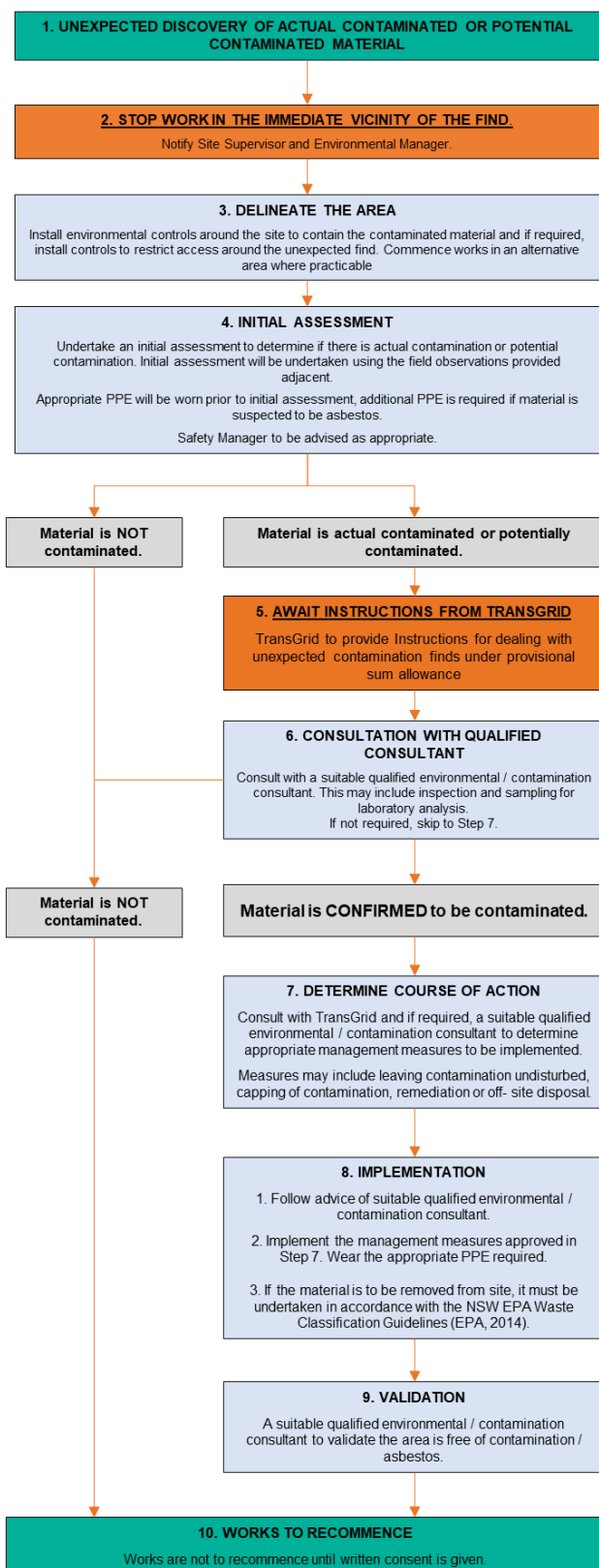


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Appendix F3 – Unexpected Contamination Finds Procedure

Contaminated Land Procedure

Unexpected Contamination Finds Procedure



Purpose

The purpose of this procedure is to detail the actions to be taken in the event that an unexpected actual or potential contaminated material is encountered during construction works associated with Stage 1 and Stage 2 of EnergyConnect (NSW – Western Section).

Definition

Contamination means the presence in, on or under land or any other aspect of the environment of a substance (i.e. gas, chemical, liquid or other matter) whether occurring naturally or otherwise, which is:

- at a concentration above the concentration at which the substance, gas, chemical, liquid or other matter, whether occurring naturally or otherwise, is normally present in, on or under land or any other aspect of the environment in the same locality, being a presence that presents a risk of harm to human health or any other aspect of the environment; or
- toxic, flammable or otherwise capable of causing harm to humans or damage to the environment including asbestos (man-made or naturally occurring), toluene, polychlorine biphenyls, lead based paints, glues, solvents, cleaning agents, paints, water treatment chemicals and acid producing spoil.

Field observations

Contamination that may not have been detected during previous investigation works may be discovered during the course of the project. Such contamination may be discovered due to the following field observations:

- odour;
- unusual discolouration or staining of soil or rock;
- seepage of unusual liquids from soil or rock;
- unusual colour, odours or sheens on groundwater and/or surface water;
- unusual metal objects;
- presence of oil;
- presence of waste or rubbish above or below ground; and
- actual or potential asbestos or asbestos containing material (ACM).

Actions

If unexpected contamination is discovered, the following procedure will be implemented:

- **STOP ALL WORKS** in the immediate vicinity of the discovery. Do not remove or unnecessarily disturb the area of the find;
- follow the adjacent flowchart;
- notify the Site Supervisor and the Environmental Manager; and
- Do not recommence work until advised to do so in writing.

Personal Protective Equipment (PPE)

The appropriate Personal Protective Equipment (PPE) will be worn prior to any contamination investigation/management. This may include, but not be limited, to:

- eye goggles;
- face mask;
- rubber boots;
- rubber gloves;
- disposal work clothes; and
- full face respirator with vapour cartridge.

Appendix F4 – Spill Response Procedure

SPILL RESPONSE PROCEDURE



IN THE EVENT OF A SPILL

1. ASSESS THE SITUATION

- Is it safe to take action?
- What is the source of spill and can it be stopped, controlled or shutdown?
- Consult the Safety Data Sheet - What PPE and emergency equipment is required?
- Are there any other hazards that need to be controlled? E.g. ignition sources?
- Do I need further assistance?



2. CEASE WORK AND IF SAFE TO DO SO, CONTROL THE SPILL

- Stop work that has resulted in the spill
- Stop the flow immediately
- Contain the spill
- Divert the spill away from waterways if needed
- Use bunds, sand etc. to limit the spread of the spill
- If spill enters the drainage system stop the spill at the low point (or it's furthest extent) if possible



3. REPORT THE INCIDENT

- Report the event to the Site Supervisor
- Site Supervisor to evaluate area and make area safe if possible and assess if further assistance needed
- Site Supervisor to notify the environment and safety teams
- Environment team to notify TransGrid
- HSE senior representative on site to call emergency services for large spills beyond the capacity of the work crew to contain or contains hazardous substances, call 000 and request Fire and Rescue HAZMAT



4. CLEAN UP THE SPILL

- Do not hose away spills into the drains or waterways
- If necessary, cover spills during rain events and divert upstream waters through use of a bund to avoid spread and further contamination
- Clean up all contaminated material, soils and water as soon as possible



5. DISPOSE OF CONTAMINATED MATERIALS

- Contaminated materials will be disposed of offsite at licensed waste disposal facility. This includes the absorbent material used for clean up



6. INVESTIGATION AND REPORTING

- Re-stock spill kits as soon as possible after the incident
- The environmental team will investigate and report the spill as required within Section 8 of the CEMP
- Implement lessons learnt to avoid reoccurrence of the incident

Notes

- Ensure the safety of yourself and others whilst implementing this procedure
- Use appropriate personal protective equipment prior to making contact with any spilt material
- Responsible persons includes personnel involved in the cause of the event, witness to the event, supervisors, Secure Energy HSE Team, construction personnel and emergency response personnel
- Major incidents should refer to the SecureEnergy's *Emergency Preparedness and Response Plan* (458060-HSE-PL-G-1015)

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