

PUBLIC



Accommodation Camp Management Plan - Dinawan EnergyConnect (NSW – Eastern Section) 45860-HSE-PL-D-0125

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C	Updated in response to agency consultation. Issue to the Environmental Representative for review
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1	Revised to address comments from DPE
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Key Document Stakeholders
To be communicated with during reviews and revisions of this document

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Abbreviations

Acronym	Definition
ACMP, this plan	Accommodation Camp Management Plan
Amendment Report	<i>Amendment Report EnergyConnect (NSW – Eastern Section)</i>
APZ	Asset protection zone
BAL	Bushfire attack level
CCS	Community Communication Strategy
CCTV	Closed-circuit television
CEMP	Construction Environmental Management Plan
Council	Murrumbidgee Council
CSSI	Critical State significant infrastructure
Cth	Commonwealth of Australia
DAWE	Department of Agriculture, Water and the Environment, now known as Department of Climate Change, Energy, the Environment and Water
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPE or Department	NSW Department of Planning and Environment
EIS	<i>Environmental Impact Statement EnergyConnect (NSW – Eastern Section)</i>
EMS	Environmental Management System
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	(Commonwealth) <i>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 – Eastern Section)
RAPs	Registered Aboriginal Parties
Response to DPE Request for Information	EnergyConnect (NSW – Eastern Section) Response to Department of Planning and Environment Request for Information (30 August 2022)
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

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Acronym	Definition
Submissions Report	<i>Submissions Report EnergyConnect (NSW – Eastern Section)</i>
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 – Eastern Section).

This plan has been prepared to address the relevant requirements of the Infrastructure Approval (SSI-9172452), the *Environmental Impact Statement EnergyConnect (NSW – Eastern Section)* (EIS), the *Submissions Report EnergyConnect (NSW – Eastern Section)* (Submissions Report), the *Amendment Report EnergyConnect (NSW – Eastern Section)* (Amendment Report).

1.2 Background

On 29 August 2019 the NSW Minister for Planning 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; and
- EnergyConnect (NSW – Eastern Section) – Buronga to Wagga Wagga (the project).

A referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was submitted on 17 September 2020. The Australian Department of Agriculture, Water and the Environment (DAWE) determined the project to be a controlled action on 30 September 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 January 2022 and was placed on public exhibition from 19 January 2022 to 15 February 2022. A total of 75 submissions were received, with 17 from government agencies, five from special interest groups, nine from local councils and 44 from the public.

The Submissions Report was prepared for the project in response to the submissions received during the public exhibition of the EIS and includes the final set of revised mitigation measures (RMMs) that are to be applied. The Submissions Report was finalised in May 2022.

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 in May 2022.

On 2 June 2022, the Department requested additional information (Project EnergyConnect (NSW - Eastern Section) (SSI-9172452) Request for Additional Information (June 2022)) to assist with the assessment of the project. In response TransGrid prepared and provided the *EnergyConnect (NSW – Eastern Section) Response to Department of Planning and Environment Request for Information* (Response to DPE Request for Information) to address the requests for information raised by the Department. The Response to DPIE Request for Information was dated 30 August 2022.

Approval for the project under the EP&A Act was granted by the NSW Minister for Planning (Infrastructure Approval SSI-9172452). 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 Dinawan accommodation camp (Camp 3) for EnergyConnect (NSW – Eastern 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 Dinawan accommodation camp.

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) and CEMP sub-plans.

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 Submission Report; 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 C50 of the Infrastructure Approval, this plan has been prepared in consultation with Murrumbidgee Council (council). This plan was issued to Murrumbidgee Council on 22 August 2022 for review and comment. On 26 August 2022, Murrumbidgee Council advised that they have no comments on this plan. Details of all consultation with Murrumbidgee 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-HSE-DOC-D-0024) 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, door knocks and project factsheets. Notifications will be issued for significant milestones. Refer to the CCS for further information.

In accordance with condition D12 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.transgrid.com.au/projects-innovation/energyconnect>. A 24-hour toll-free telephone number (1800 490 666) 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 A12 of the Infrastructure Approval. The ACMP will be submitted to the Department for

information afterwards. 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 D2 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 D6 of the Infrastructure Approval;
- submission of an audit report under condition D11 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:

- where requested or required by DPE (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 delegate to prepare the revised documents. The revised document will then be issued to the Project Director for internal approval 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 Murrumbidgee Council. If required, the updated ACMP will be submitted to Murrumbidgee Council and DPE for information.

As permitted by condition A8, 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, to determine whether it is consistent with the approved project.

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

If any changes to the project requires 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));
- *Native Title Act 1993* (Cth);
- *Planning Systems State Environmental Planning Policy (SEPP) 2021* (now consolidated into the *State Environmental Planning Policy (Planning Systems) 2021*);
- *Environmental Planning and Assessment Act 1979*;
- *Biodiversity Conservation Act 2016*;
- *Biosecurity Act 2015*;
- *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*;
- *Public Health Act 2010*; and
- *National Parks and Wildlife Act 1974*.

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			
C19	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 6.7 Section 7.2	Section 16.4.1 of the EIS states that the Dinawan accommodation camp is not affected by flooding. Thus, the accommodation buildings and associated infrastructure placed within the Dinawan accommodation camp site are unlikely to be impacted by flooding. However, Dinawan construction compound and accommodation camp could

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Condition no.	Requirement	Where addressed	How addressed
			be subjected to overland flow after large rainfall events.
	b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council or BCS.	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, as required, to capture sediment-laden surface water runoff. These measures will be designed, constructed and maintained to minimise impacts to surface water quality and localised flooding.
Operating conditions			
C44	The Proponent must:		
	a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Section 7.3	The management measures to minimise fire risk are 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: (i) 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; (ii) 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 (including all-weather access to the water supply tanks for Category 1 tankers); (iii) incorporates the recommendations of a fire risk assessment as per Transgrid's design standards;	Section 7.3	An 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. 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. 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

Condition no.	Requirement	Where addressed	How addressed
			relevant to the accommodation camp.
	c) ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS3959-2018 <i>Construction of buildings in bushfire-prone areas</i> (or equivalent) and RFS's <i>Planning for Bushfire Protection 2019</i> ;	Section 7.3	Buildings within the accommodation camps will be built to a Bushfire Attack Level (BAL) rating 12.5. The buildings within the accommodation camps will comply with the relevant 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			
C50	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan in consultation with the relevant Council. The plan must:	This plan	This ACMP was prepared in consultation with Murrumbidgee 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;	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 camps comply with conditions C19 and C44;	Where condition C19 and C44 are addressed is provided in the rows above.	How conditions C19 and C44 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: (i) complies with 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; (ii) 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 measures for dust suppression within the accommodation camps;	Section 7.5 Appendix D	Onsite management measures to suppress dust generation is provided in Appendix D.
	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-1004) has been developed and considers the local market conditions and capacity.
	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 B of the Submissions Report. 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 several accommodation camp sites that are required to support construction of the project. These sites are essential to deliver the project. This ACMP describes the environmental management approach that will be adopted during operation of the Dinawan accommodation camp.

The Dinawan construction compound and accommodation camp site will be located along the eastern side of Kidman Way adjacent to the proposed Dinawan substation site and around 30 kilometres to the south of the township of Coleambally. Refer to Figure 3.1 for the indicative site boundary.

The Dinawan accommodation camp will provide accommodation for approximately 400 project personnel along with other facilities such as food and catering facilities, tavern, fitness and recreational facilities (such as indoor and outdoor recreational spaces), parking, 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 as required, a wastewater treatment plant (WWTP) which includes a basin type storage pond (turkey's nest).

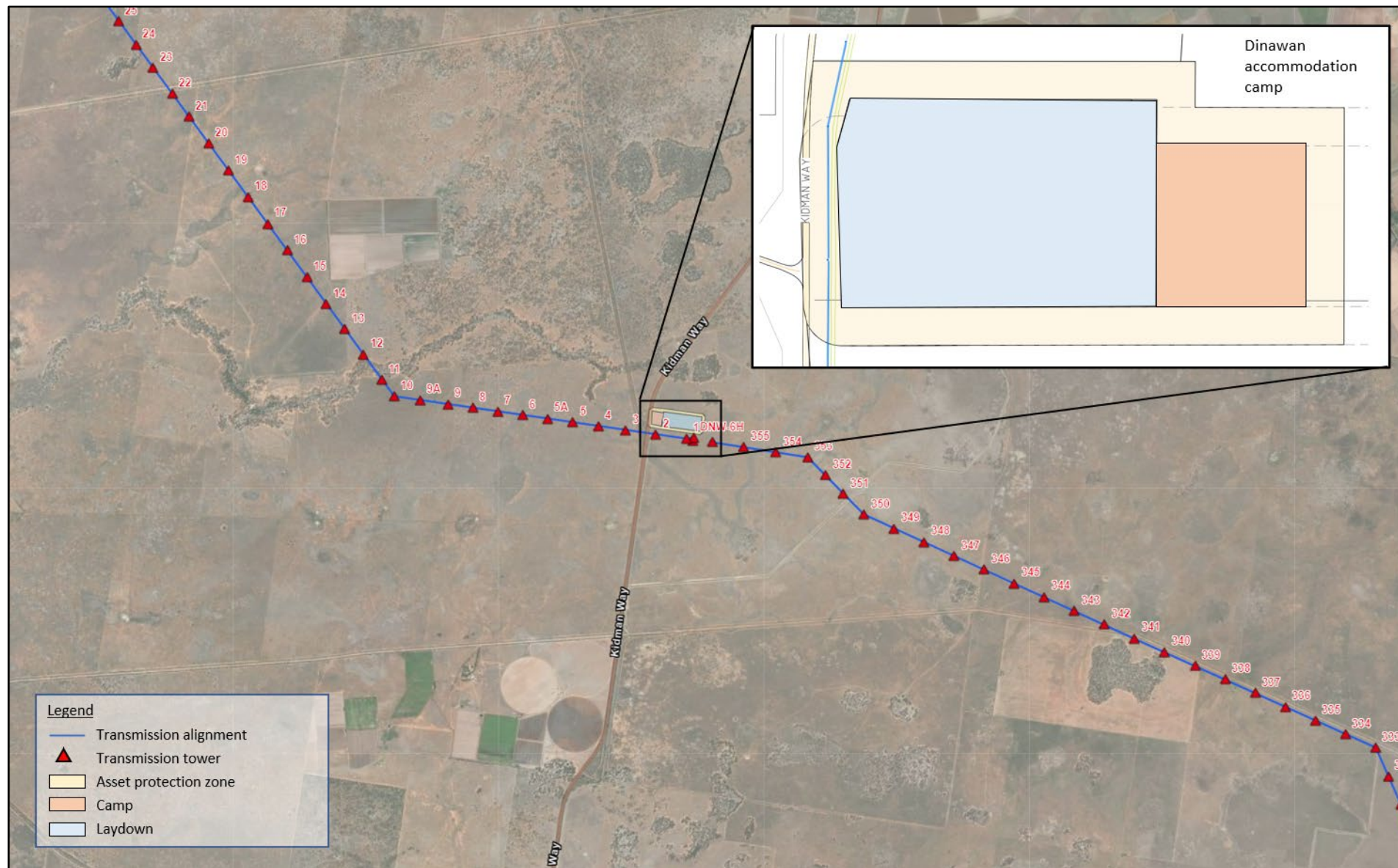


Figure 3.1 - Indicative site boundary of Dinawan accommodation camp

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3.1 Fly camps

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

The fly camp will be situated within the accommodation camp and construction compound site boundaries as indicated within Figure 4.1.

The construction crew will utilise the fly camp until operation of the accommodation camp commences. The fly camp 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 camp 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 camp. This includes pre-filling the WWTP bioreactor with waste generated during the operation of the fly camp 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.

3.2 Activities

The key components of operating the accommodation camp 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 camp	A fly camp is required to facilitate the construction of the Dinawan accommodation camp. The fly camp 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 camp. The fly camp will be situated within the approved camp and compound site boundary.
Operation of Dinawan accommodation camp and associated facilities	Dinawan accommodation camp will operate for 24 hours for 7 days a week. Dinawan accommodation camp will accommodate for 400 personnel at peak. The operation of Dinawan accommodation facilities includes, but is 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.
Operation of wastewater treatment plants at Dinawan accommodation camp	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.
Maintenance of the asset protection zones and vegetation	From the commencement of operation of Dinawan camp and for every bushfire season throughout the project duration, the asset protection zones (APZ) around the perimeter of occupied buildings will be regularly maintained to a grass height of 100mm or less. The APZ will remain in place and be maintained during the operation of the Dinawan accommodation camp until demobilisation.

3.3 Operating hours

Section 6.10.2 of the EnergyConnect (NSW – Eastern Section) EIS states that operation of the accommodation camps would be undertaken 24 hours a day, seven days per week. The Out of Hours Work Protocol will not apply to operation of the Dinawan accommodation camp.

4 Utility design requirements

The following section addresses condition C50 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. Table 4.1 provides a description of the utility requirements during the establishment and operation of Dinawan accommodation camp.

Table 4.1 - Installation and connection of utility

Utilities	Description of utility requirement during operation of the accommodation camps
Water	No connection to council's potable water supply network is required at Dinawan accommodation camps. All water supply would be purchased from existing local regulated water sources and transported to the accommodation camp during the operation. As such, no connection and utilisation of water from the council's water supply network is required.
Wastewater	No connection to the council's wastewater sewage system is required at Dinawan 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 will be 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 camp.

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 the 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 camp would operate collectively under the project and not as individual dwelling sites.

Clause	Utility services	Requirements	How addressed
		(3) The water supply service must comply with – (a) the <i>Plumbing and Drainage Act 2011</i> and the regulations made under that Act, and (b) the requirements of a relevant statutory body.	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.
		(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.	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 an existing regulated potable water source and transported to site for consumption or domestic purposes.
Clause 28	Sewerage	(1) A manufactured home estate must be (a) connected to a main sewer, or (b) provided with an alternative sewage disposal system as specified in the approval.	WWTPs will be established and operational at the accommodation camp as a form of alternative sewage disposal system.
		(2) A dwelling site must be connected to the sewage disposal system for the manufactured home estate.	The facilities within the accommodation camp where wastewater will be generated will be connected to the WWTPs.
		(3) The sewage disposal system must comply with - (a) the <i>Plumbing and Drainage Act 2011</i> and the regulations made under that Act, and (b) the requirements of a relevant statutory body.	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	(1) A manufactured home estate must be provided with a stormwater drainage system as specified in the approval.	The accommodation camp will include temporary perimeter drainage to divert clean stormwater around the camp. While temporary internal drainage channels and a sediment basin, as required, would capture stormwater that falls within the site boundary for reuse as dust suppression.
		(2) A dwelling site must be - (a) connected with the stormwater drainage system for the manufactured home estate, or (b) provided with an on-site stormwater drainage system.	Not applicable. The accommodation camps would operate collectively under the project and not as individual dwelling sites.
		(3) A stormwater drainage system must comply with - (a) the Plumbing Code of Australia, and (b) the requirements of a relevant statutory body.	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, as required, for discharge.

Clause	Utility services	Requirements	How addressed
Clause 30	Electricity supply	(1) A dwelling site must be supplied with electricity from a reticulated electricity service by an electrical circuit connected to a separate electricity meter.	An investigation into the existing electricity network will be 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.
		(2) The electrical circuit must be installed in accordance with the Australian/New Zealand Wiring Rules.	The electrical circuit will be installed in accordance with the AS/NZS 3000:2018.
		(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 will be 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. 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.	If common trenching is required, it will be undertaken in accordance with AMCORD.

4.1 Site layout

Figure 4.1 shows the indicative site layout of the Dinawan accommodation camp. The figure provides 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 change during the detailed design phase.

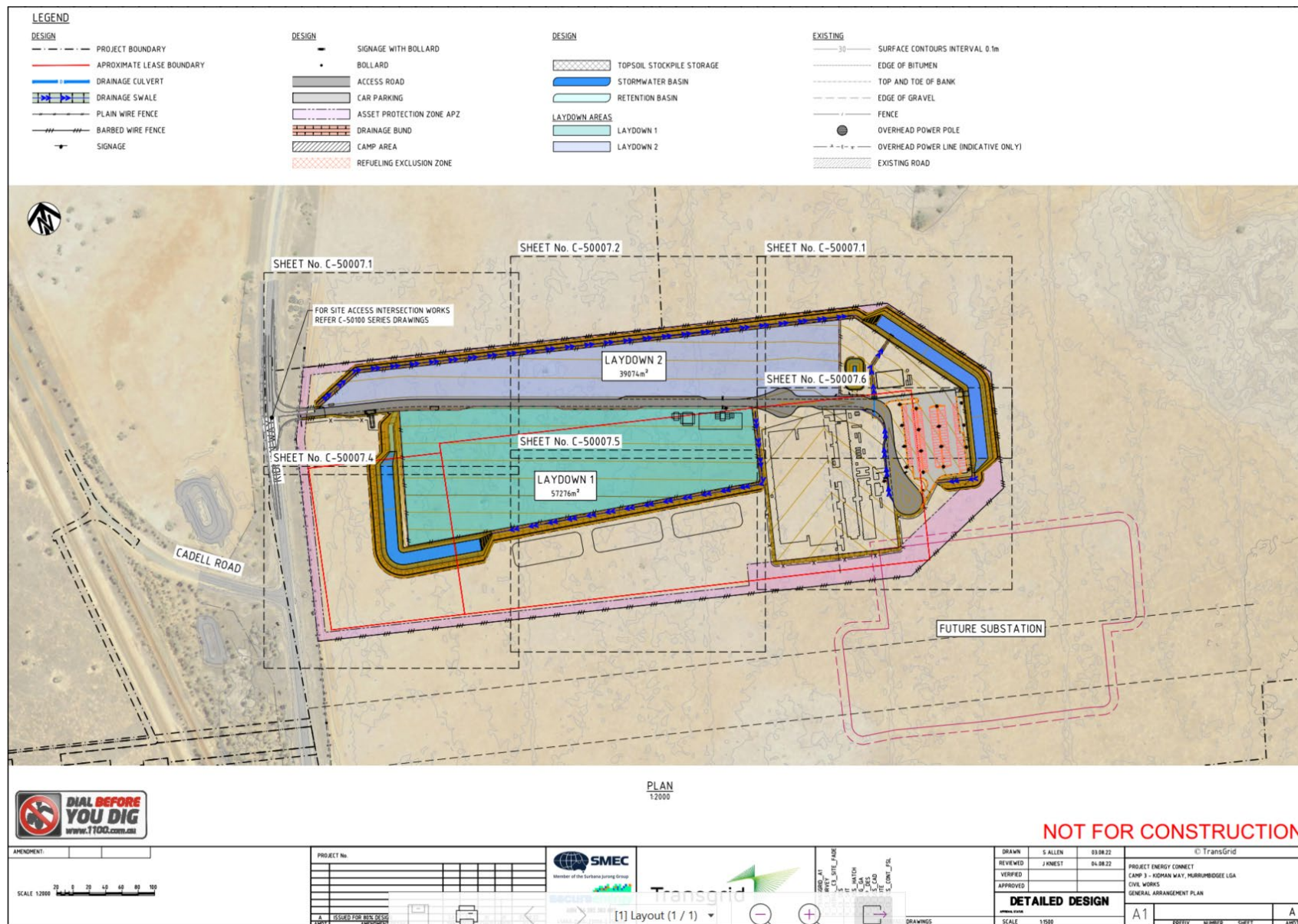


Figure 4.1 - Indicative site layout of Dinawan accommodation camp

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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: • 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.

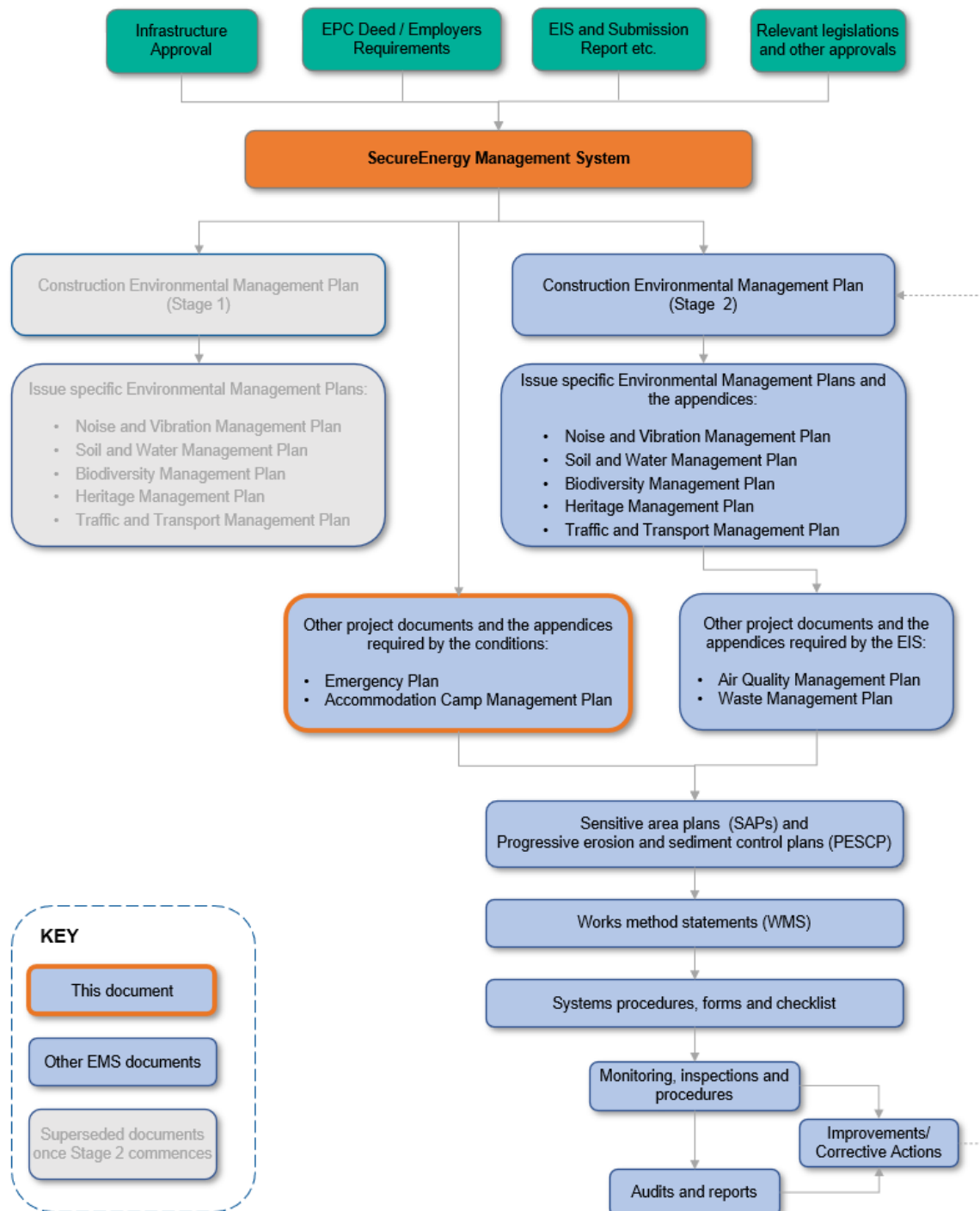


Figure 5.1 - Environmental management framework

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 Dinawan accommodation camp. 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

Sensitive area plans (SAPs) will be prepared to support the identification and appropriate management of key environmental features associated with the project. An initial risk assessment for the site will be undertaken by the Environmental Team. Where the risk is identified as being moderate or above (i.e. locations where sensitive areas are located adjacent to the work area), a SAP will be developed and reviewed by the environmental team. The SAPs will identify areas/features of environmental and heritage sensitivity and 'no go' zones, to help identify key risk areas, and promote ongoing communication to construction personnel.

Site hazard analysis plans include information pertaining, but not limited to:

- flora features, including threatened species and endangered ecological communities;
- Aboriginal and non-Aboriginal heritage sites and items;
- 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 initial Erosion and Sediment Control Plan to detail the erosion control measures to be utilised across a range of different receiving environments and landforms on the project. Environmental staff will then typically develop any PESCPs in consultation with Project Engineers, Superintendents and Supervisors. For high-risk environments, such as works near the major river systems or in steep or highly erodible terrain, the progressive ESCPs will be reviewed by the CPESC. This will ensure that erosion and sediment control management is incorporated into the planning stage of construction activities and is coordinated in its approach. PESCPs will be updated as required as sites and associated erosion and sediment control requirements change as the works progress.

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 camp 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

The Dinawan accommodation camp does not impact any known or recorded threatened ecological communities, threatened flora species or important habitat areas for Plains Wanderer.

Potential impacts on biodiversity during operation of the accommodation camp (including vegetation clearing, grubbing and topsoil stripping) would include the following:

- direct impacts due to ongoing vegetation trimming for maintenance purposes such as the asset protection zones (APZ); and
- indirect impacts relating to reduced viability of adjacent habitat due to noise, dust or light spill.

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

6.3 Heritage

The Dinawan accommodation camp site does not impact any recorded Aboriginal or non-Aboriginal heritage features/items including artefact scatters or identified PADs. No potential impacts on Aboriginal and non-Aboriginal heritage is therefore anticipated during operation of the accommodation camp.

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

6.4 Land use and property

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

Land will be rehabilitated at the completion of the operation of the camp 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 camp 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 includes the use of overhead lighting, placement of temporary building and structures the presence of plants and equipment

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

6.6 Social and economic

The accommodation camp 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

Section 16.4.1 of the EIS states Dinawan accommodation camp is not affected by flooding and the construction proposed are unlikely to affect flood behaviour or exacerbate existing flooding characteristics. However, Dinawan construction compound and accommodation camp could be subjected to overland flow after large rainfall events.

The accommodation camp will be impacted by stormwater runoff and surface water flow. The accommodation camp will have minor impacts to the local surface water flow characteristics. Erosion and sediment control measures will be implemented to manage and minimise surface water runoff. 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 camp. Potential direct impacts and the emissions sources include:

- dust emission from vehicle movements;
- engine combustion emissions from on-site machinery operation and vehicles travelling within the site; and
- fugitive emissions such as volatile organic compounds from on-site chemical/fuel storage and handling.

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

6.9 Noise and vibration

Dinawan accommodation camp is located approximately 4km from the nearest sensitive receiver. Based on the distances to sensitive receiver, no receivers are predicted to be adversely impacted during operation of the accommodation camp.

6.10 Traffic and access

Access to Dinawan accommodation camp will be via Kidman Way. Traffic generation on roads directly adjacent to the accommodation camp site is estimated to generate the highest traffic volumes over the course of construction when compared to other project areas, due to the consistent construction vehicle activities associated with the use of the accommodation camp.

The additional traffic movements would bring a noticeable change to the quiet local road environment however from a road capacity point of view, all haulage routes, which includes the roads near the accommodation camp, would still operate at the same Level of Service as per the existing condition.

Therefore there will be minor impacts to the local road network, however, the increases in traffic volumes associated with the operation of the accommodation camp are not likely to significantly impact 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 during operation of Dinawan accommodation camp would mainly be associated with the following activities:

- on-site storage, handling and transport of dangerous and hazardous goods, contaminated soils and hazardous waste which increases potential contamination risk;
- on-site storage, handling and transport of flammable goods which increases bushfire risk; and
- use of treated wastewater from the wastewater treatment plant that is below the water quality requirement.

Management of bushfire safety is further detailed in Section 7. 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 and contamination

Operation of the accommodation camp will have temporary impacts on the surrounding soil. Potential impacts to soils and potential contamination impacts during the operation of the accommodation camps include:

- spills and leaks from materials, plant and equipment;
- spills and leaks from the operation of the wastewater treatment plants; and
- exposed ground leading to increase erosion and sedimentation.

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

6.13 Waste management

Various waste types will be generated during operation of the accommodation camp ranging from domestic waste to wastewater. Potential waste streams include:

- 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; and
- waste oils, greases and lubricants from maintenance of plant and equipment.

7 Environmental management measures

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

The following sections describe the environmental management of key environmental aspects mentioned in condition C50 of the Infrastructure Approval.

7.1 Surface water flow

Stormwater runoff and surface water flow from upslope areas will be diverted around the accommodation camp site, where possible.

Cut and fill earthwork activities will be undertaken at Dinawan 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 to runoff into the temporary drainage channels and eventually into the temporary sediment basin, as required.

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, as required, 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-D-0018). The reuse of stormwater will be in a controlled matter and will consider the factors outlined in Section 7.5.

7.2 Flooding

As outlined in Section 6.7, Dinawan accommodation camp is not located on flood prone land. Thus, the accommodation buildings and associated infrastructure placed within the Dinawan accommodation camp site are therefore unlikely to be impacted by flooding.

However, Dinawan construction compound and accommodation camp could be subjected to overland flow after large rainfall events. The drainage infrastructure at Dinawan accommodation camp would be designed to not materially worsen flood impacts downstream.

No impact to the existing flood storage capacity is anticipated given the approximate equal cut and fill earthwork quantities at the accommodation camp site. No drastic impact or materially altered impact is anticipated for existing flood flow or characteristics for the areas beyond the accommodation camp boundary.

7.3 Bushfire safety

Design

Occupied buildings within the Dinawan accommodation camp will be designed and constructed to account for the following:

- comply with the relevant 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;
- 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 or an equivalent alternative solution that achieves the same level of bushfire risk management in compliance with the AS3959-2018; 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.

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 will be maintained during the operation of the accommodation camp site until demobilisation. 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 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 grass height of 100mm or less; 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;

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- 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.

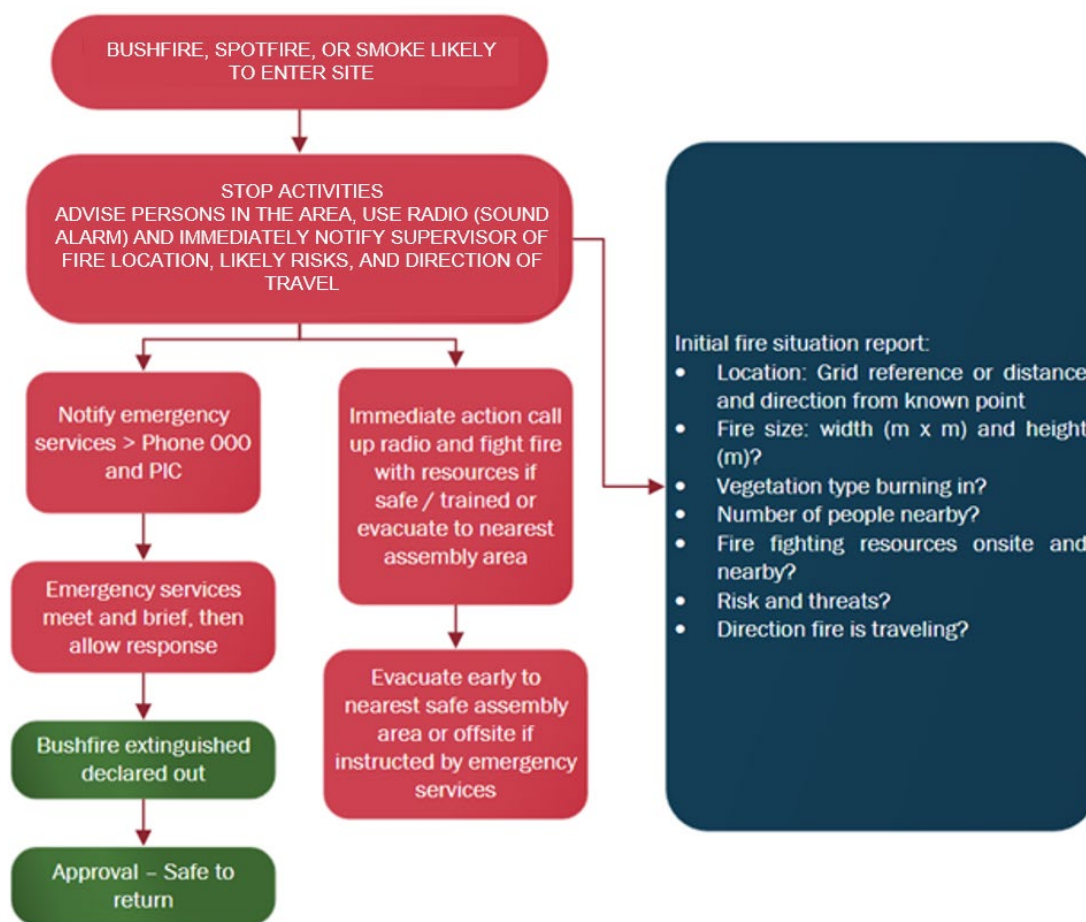


Figure 7.1 - Bushfire and fire response procedure

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
- 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 Murrumbidgee Local Government Area (MIA office, Mid Murray office)	03 5898 4100	
Other information (non-emergency)		
NSW Police Murrumbidgee Police District (not 24 hours)	02 6969 4310	
NSW Ambulance	131 233	
State Emergency Service	132 500	

7.4 Wastewater treatment plants

As water is a valuable resource particularly in 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.

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Wastewater treatment plants (WWTPs) would be established at the Dinawan 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. 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-D-0018).

The wastewater treatment systems will discharge into turkey's nests situated at each camp site in the vicinity of the WWTPs. Prior to release, the wastewater from the WWTPs should meet the water quality objectives provided in Table 7.2. 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 the *Soil and Water Management Plan* (45860-HSE-PL-D-0112).

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-D-0018) 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;
- 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 used in a manner that may result in overspray onto food crop;
- 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 in 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-HSE-DOC-D-0024) 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.transgrid.com.au/projects-innovation/energyconnect>; and
- enquiries and complaints line (24 hour) on 1800 490 666.

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-1004) has been developed and considers the local market conditions and capacity. The Local Business and Employment Strategy includes 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* 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 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* 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 D6 and Appendix 4 of the Infrastructure Approval. As such, Transgrid will notify DPE via the Major Projects website immediately after becoming aware that an incident has occurred. A written notification will then be provided to DPE 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 approval;
- 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 DPE 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 DCCEE 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
Vegetation level in APZs	Visual inspections of grass height within APZs is maintained to a grass height of 100mm or less.	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.	As required	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 will undertake regular inspections of works sites, and in particular critical activities. Inspections would typically occur on a fortnightly basis depending on the complexity and anticipated risks associated with the works. These inspections may include a review of the operation of the Dinawan accommodation camp.

The proposed inspection schedule is provided in Table 10.2.

Table 10.2 - Inspection schedule

Activity	Frequency	Location	Responsibility	Record
Environmental site inspection	Weekly	Accommodation camp may be inspected as part of the project weekly inspections	SecureEnergy Environmental Manager and SecureEnergy Camp Manager	Site inspection checklist

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 D11 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 identify any non-compliances, 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.

10.4 Reporting non-compliances

10.4.1 Reporting non-compliances in accordance with the Infrastructure Approval

Non-compliance is defined in the 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 D7 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 DCCEE in accordance with the requirement of the EPBC Act. Transgrid will notify DCCEE 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

No	Report	Requirement	Timing	Responsibility	Recipient
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	DPE
3	Non-compliance notification	Planning Secretary must be notified within 7 days after identifying the non-compliance.	As required	SecureEnergy/ Transgrid	DPE
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	DPE

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 1993</i>	Native Title Land	All	Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.	The project area intersects with various native title area associated with various Traditional Owners and Aboriginal groups. The various Traditional Owners and Aboriginal groups will be included in consultation.	Transgrid SecureEnergy
New South Wales legislation					
<i>State Environmental Planning Policy (State and Regional Development) 2011</i> (now consolidated into <i>State Environmental Planning Policy (Planning Systems) 2021</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. The provision for the EnergyConnect CSSI declaration under the <i>State Environmental Planning Policy (State and Regional Development) 2011</i> has since been included in the <i>State Environmental Planning Policy (Planning Systems) 2021</i>	Transgrid
<i>Environmental Planning and Assessment Act 1979</i> (EP&A Act)	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>Environmental Impact Statement EnergyConnect (NSW - Eastern Section)</i> was submitted to Department of Planning and Environment in January 2022 and publicly exhibited between 19 January 2022 and 15 February 2022. In May 2022 the response to submissions was finalised in the <i>Submissions Report. EnergyConnect (NSW - Western Section)</i> . A separate <i>Amendment Report EnergyConnect (NSW - Western Section)</i> to document design changes and	Transgrid

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Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				additional environmental assessment undertaken, was also finalised in May 2022.	
		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 Submissions Report.	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 - Eastern Section) was granted by the Minister for Planning.	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 <i>Biodiversity Conservation Act 2016</i> , together with the <i>Biodiversity Conservation Regulation 2017</i> , 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 are applicable to the project. Transgrid, as the Proponent, will retire the full biodiversity offset credit liability of the development.	Transgrid
<i>Biosecurity Act 2015</i>	Weeds and Pest Management	Section 22	Under Part 3 of the <i>Biosecurity Act 2015</i> , landowners or land managers have a general biosecurity duty to prevent, eliminate or minimise the biosecurity risk posed or likely to be posed by priority weeds. A biosecurity risk exists where priority weeds have the potential to negatively impact on agriculture, industry, the liveability of our city, human health or the environment. Invasive weeds	Biosecurity matters will be discussed with the affected landholders and addressed in project management plans for each property.	Transgrid SecureEnergy

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Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
			are known as 'Biosecurity Matter' or 'Priority weeds'.		
<i>Local Land Services Act 2013</i>	Clearing of native vegetation in regulated rural areas	Part 5A Division 3 Clause 60N and Clause 60O	Clause 60N details the offence to clear 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
<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: - 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

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Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
	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
<i>Public Health Act 2010</i>	Wastewater	All	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 from the wastewater treatment plant will not be reused for human consumption or skin penetration activities.	SecureEnergy
<i>Heritage Act 1977</i>	Heritage	Section 146	A person who is aware or believes that he or she has discovered or located a relic must within a reasonable time notify the Heritage Council of the location of the relic, unless he or she believes on reasonable grounds that the Heritage Council is aware of the location of the relic, and within the period required by the Heritage Council, furnish the Heritage Council with such information concerning the relic as the Heritage Council may reasonably require.	Yes, notification requirements are detailed Appendix F2 – Unexpected Heritage Finds Procedure.	SecureEnergy
<i>Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005</i>	Utilities	Division 3, Subdivision 4	Utilities requirements for manufactured home estates for short-term and long-term accommodation.	Condition C50 a) of the Infrastructure Approval requires that utilities at the accommodation camps, including water, wastewater, waste and electricity be designed and located in accordance with council specifications. <i>Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2021</i> Division 3, Subdivision 4 have been applied to provide guidance to the utilities at the accommodation camps.	SecureEnergy

Appendix B – Revised mitigation measures

Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
Biodiversity				
B14	All relevant project personnel, including relevant sub-contractors would be trained on biodiversity management protocols and the requirements for the project, through inductions, toolbox talks and targeted training, and provided with sensitive area maps (showing clearing boundaries and exclusion zones) and updates as required.	All locations	MM2	All relevant project personnel will be trained on the biodiversity protocol. Site hazard analysis plans will be prepared to include clearing boundary, exclusion zones and location of threatened species. Site hazard analysis will be issued to the relevant site personnel.
B18	A species unexpected finds protocol would be implemented if threatened ecological communities, flora and fauna species, not identified in the biodiversity assessment, are identified in the disturbance area.	All locations	MM3	If an unexpected threatened species find is discovered, the Unexpected Threatened Species Procedure will be followed.
Aboriginal heritage				
AH11	If at any time during construction, any items of potential Aboriginal archaeological or cultural heritage significance, or human remains are discovered outside of previously recorded sites or PAD, they would be managed in accordance with an Aboriginal heritage unexpected finds protocol aligned with the protocol in Appendix 3 of the Revised Aboriginal Cultural Heritage Report.	All locations	MM4 and MM5	If an unexpected heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.
Non-Aboriginal heritage				
NAH5	If at any time during construction, any items of potential historic heritage archaeological significance, or human remains are discovered, they would be managed in accordance with an unanticipated discovery protocol that is aligned with the protocol in Appendix 1 of Technical paper 3.	All locations	MM4 and MM5	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	Application location(s) (from RMMs)	Where addressed	How addressed
Land use and property				
LP7	Biosecurity controls would be implemented during construction to minimise the risk of off-site transport or spread of disease, pests or weeds. Controls would include (but not limited to): - 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. The specific controls applicable to a property will be identified in consultation with the affected landholder. The effectiveness of these controls would be monitored in a manner and time interval consistent with the level of risk on each property.	All locations	MM6 and MM7	The supplier/owner of plant and equipment shall complete a Hygiene Inspection Form prior to arriving or upon arriving to the project site. All vehicles and mobile plant will be inspected on arrival at the construction compounds.
LP8	Where present in locations that would be accessed for construction activities, weeds would be managed in consultation with the relevant landholder. Consultation would also occur with the relevant authority (Local Land Services, the relevant local council, or NSW DPI) in relation to notifiable weeds.	All locations	MM8	The relevant landowner 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 <i>Biosecurity Act 2015</i> and <i>Biosecurity Regulation 2017</i> .	All locations	MM9	The relevant control authority will be notified in the event of new infestations of notifiable weeds.
Landscape and visual amenity				
LV3	Lighting at construction compound and accommodation camps would be designed and operated in accordance with AS4282-2019 Control of the obtrusive effects of outdoor lighting.	Construction compound and accommodation camps	MM10	Lighting at the accommodation camps will be designed and operated in accordance with the relevant sections of <i>AS4282-2019 Control of the obtrusive effects of outdoor lighting</i> .

Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
Social and economic				
SE1	A Community and Stakeholder Engagement Management Plan (CSEMP) would be implemented. This would include: - appropriate communication and engagement tools and approaches to engage with councils, landholders, community groups in service communities, emergency services and the broader community - complaint handling processes in line with the Transgrid Complaints Handling Policy.	All locations	MM11	A <i>Community Communication Strategy</i> (45860-HSE-DOC-D-0024) has been prepared and outlines the communication and engagement tools.
SE3	A Local Business and Employment Strategy would be implemented to guide local opportunities during construction, and where possible, align with existing plans and strategies of regional study area LGAs, and Transgrid's Reconciliation Action Plan. The strategy would be developed in consultation with the affected local councils and would take into account current unemployment trends across the region. The strategy would include initiatives for: - local supplier and labour procurement targets - Aboriginal workforce and business participation - training and upskilling programs for local labour force - transitioning the local workforce following the completion of construction.	All locations	MM12	A <i>Local Business and Employment Strategy</i> (45860-CM-PL-G-1004) has been developed and considers the local market conditions and capacity.
Hydrology, flooding and water quality				
HF5	Water supply options and management will be undertaken in accordance with agreements between the construction contractor and relevant suppliers.	All locations	MM13	Discussions with existing local regulated water suppliers regarding water supply options have commenced and will be ongoing throughout the project as required.
Traffic				
TA3	Any permits required under the National Heavy Vehicle Law for oversized and overmass vehicle movements associated with the proposal would be obtained from the National Heavy Vehicle Regulator. Permit applications would be supported by a Vehicle Movement Plan prepared to identify the proposed heavy vehicle route(s). The plan would consider activities of adjoining land uses and safety of the public, particularly when entering urban areas from rural highways.	Construction haulage routes, access/egress points to access tracks and main construction compound and accommodation camps.	MM16	Permits will be obtained from the National Heavy Vehicle Regulator (NHVR) for the movement of oversize and overmass vehicles as required. The permit applications will be supported by a Vehicle Movement Plan (VMP),

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Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
TA5	A Driver Code of Conduct would be developed and implemented. The code would: - define acceptable driver behaviour for proposal personnel to promote road safety - address fatigue management - ensure that the impacts of construction-related vehicle movements on local roads and the local community are minimised.	Construction haulage routes, access tracks, main construction compound and accommodation camp accesses	MM17	All vehicle drivers will follow the <i>Drivers Code of Conduct</i> provided in Appendix F5 of this plan.
TA9	A Community Communications Strategy would be developed and implemented to manage communications in order to engage and notify local communities of major works that could disrupt the road network. The Community Communication Strategy would be developed in conjunction with the Traffic and Transport Management sub-plan to detail the methodology, frequency and response measures in relaying information to the community and for addressing community concerns. All affected communities would be notified in advance of any disruptions to the transport network. This may be in the form of variable message signs, website notices, public notices in local publications and personal correspondence.	All locations	MM11	A <i>Community Communication Strategy</i> (45860-HSE-DOC-D-0024) have been prepared and outlines the communication and engagement tools to notify the local communities of major works that could disrupt the road next work.
TA15	Road and surface conditions and the traffic controls implemented at each proposal site access/egress point from the sealed road network would be monitored during construction. Any identified issues would be rectified.	Access/egress points to access tracks and the main construction compound and accommodation camps	MM18	Surface conditions at the site access/egress point from the sealed road network would be monitored during the operation of the camp.
TA16	Existing connections to the public road network would be considered for use when access to construction locations via private land is required. Existing site access points would be used for construction access where feasible and reasonable and in consultation with the relevant landholder. Consultation with the relevant roads authority would occur for all new site access points.	Access/egress points to access tracks	MM19	A new access point will be required to be used for operation of the Dinawan Camp. Consultation with the relevant landowner and roads authority would occur if a new site access/egress point is required for the operation of the accommodation camp.
TA17	Temporary access points within the road reserve that are not required for operational reasons would be removed and restored in consultation with the relevant roads authority following the completion of construction.	Access/egress points to access tracks	MM20	The access point will be removed at the completion of construction if the access point is not required for the operation of the Dinawan substation.

Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
Air quality				
AQ1	To minimise particulate and gaseous emissions during construction, the following measures (as a minimum) would be implemented where practicable and appropriate: • use of water sprays or surfactants as required for dust suppression • adjust the intensity of dust generating activities based on observed dust levels and weather forecasts • protect stockpiled materials from wind erosion to minimise dust generation and position stockpiles as far as practicable away from any nearby receptors • limit vehicle movements to designated entry/exit routes and parking areas • implement measures to minimise the tracking of dust generating material onto paved roads • inspect and clean paved roads in the vicinity of site access points as required to minimise dust generation (up to 100 metres either side of the access point) • cover the loads of potential dust producing materials • minimise the extent of ground disturbance as far as practicable • stabilise disturbed areas as soon as practicable. The effectiveness of the installed controls would be monitored, and additional controls implemented as required to address any performance issues identified.	All locations	MM21 to MM24	An <i>Air Quality Management Plan</i> (45860-HSE-PL-D-0020) has been prepared and details air quality management measures to be implemented for the project. The relevant management measures to minimise air quality impacts is provided in MM17 to MM20 Appendix D.
AQ2	Ensure that all vehicles and machinery are fitted with appropriate emission control equipment and maintained in a proper and efficient manner in line with guidelines contained in the National Environment Protection (Diesel Vehicle Emissions) Measure 2009.	All locations	MM25	All vehicles and machinery will be fitted with and maintain the appropriate emission control equipment.

Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
AQ5	To minimise potential odour emissions and impacts from the wastewater treatment plants, the following measures would be implemented where practicable and appropriate: - 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. The effectiveness of the installed controls would be monitored, and additional controls implemented as required to address any performance issues identified.	Cobb Highway, Dinawan and Lockhart construction compound and accommodation sites	MM26 to MM29	The relevant management measures to minimise potential odour emissions from the wastewater treatment plants is provided in MM22 to MM25 of Appendix D.
Hazard and risk				
HR2	A minimum 50 metre wide managed APZ would 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. Any Asset Protection Zone would be regularly maintained to provide a maximum grass height of up to 150mm during the prescribed Bushfire Danger Period and when the grassland fuel reaches 70 per cent cured. Vegetation inside the main construction compounds and accommodation camp sites will be regularly maintained to a maximum height of 75 millimetres.	Main construction compounds and accommodation camps	Section 7.3 MM32 and MM33	Bushfire risk management measures, particularly in relation to asset protection zones are detailed in Section 7.3 and provided in MM32 and MM33 in Appendix D.
HR3	Buildings within the construction compound and camp site would be constructed to comply with Section 3 and Section 5 (BAL 12.5) of <i>Construction of Buildings in Bushfire Prone Areas – AS 3959:2018</i> (Standards Australia, 2018). The sub-floor space of each building would be enclosed with stainless steel flymesh securely fixed to the external wall(s) and buried into the ground, unless an alternative fire protection approach that achieves the same level of bushfire risk management is identified by a suitably qualified specialist.	Main construction compounds and accommodation camps	Section 7.3 MM34	Bushfire risk management measures, particularly in relation to BAL 12.5 design requirement are detailed in Section 7.3 and provided in MM22 to MM36 in Appendix D.

Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
HR4	Water for fire-fighting operations would be confirmed with consideration to occupancy density and site layout. This would include onsite static water supply and fire-fighting hose reels when working in areas where vehicles may travel through environments such as areas of: - known rocks where equipment such as bulldozers and excavators may create sparks - long cured (dry) vegetation (grass and crops). All weather access having a minimum width of four metres would be provided to the static water supply tanks	Main construction compounds and accommodation camps	Section 7.3 MM35 and MM36	Bushfire risk management measures, particularly in relation to dedicated firefighting equipment are detailed in Section 7.3 and provided in Appendix D.
HR6	Security measures would be implemented to minimise the risk of ignition leading to bushfire(s). Sources of potential ignition would be secured at the end of each shift or as sites are left unattended.	All locations	MM37	Sources of potential ignition with the accommodation camp would be secured at the end of each working day to minimise the risk of arson.
HR7	Consultation with emergency services (the NSW Rural Fire Service and Fire and Rescue NSW) would be undertaken prior to construction to ensure emergency access provisions are provided during operation.	All locations	Section 7.3 MM38	Bushfire risk management measures, particularly in relation to consultation with emergency services are detailed in Section 7.3 and provided in Appendix D.
HR8	Prior to the occupation of the construction camps and offices, all bushfire protection and mitigation measures would be certified as compliant with relevant regulatory requirements by a suitably qualified bus fire consultant.	All locations	Section 7.3 MM39	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.
HR9	Controls to minimise potential ignition of vegetation would be implemented and a water supply (suitable extinguisher) and trained operator on hand during all outdoor hot works/grinding activities, and during vegetation slashing within and adjacent to the construction compounds and accommodation camps. No outdoor hot works would 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	MM40 and MM41	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.
HR11	All chemicals, fuels or other hazardous substances would 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 MM42 and MM43	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 Appendix D.

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Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
HR12	Equipment would be checked in accordance with Australian Standard requirements for potential electrical faults, including faulty power leads and generators.	All locations	MM45	Service safety inspection, testing and tagging will be undertaken for electrical equipment in accordance with the relevant Australian Standard requirements
HR13	Dangerous goods and hazardous substances would be transported in accordance with relevant legislation and codes, including the <i>Dangerous Goods (Road and Rail Transport) Act 2008</i> , Road and Rail Transport (Dangerous Goods) (Road) Regulation 1998 and the <i>Australian Code for the Transport of Dangerous Goods by Road and Rail</i> (National Transport Commission, 2018).	All locations	MM46	MM42 in Appendix D outlines the measures to transport dangerous good and hazardous substances.
HR14	Appropriate spill containment equipment would be provided and located at strategic, accessible locations.	All locations	MM47 and MM48	The Spill Response Procedure will be followed if a spill occurs.
HR15	Security measures would be implemented to minimise the risk of arson within and adjoining construction areas. The location of appropriate security measures would be determined using a risk-based approach.	All locations	Section 7.3 MM49	Security fencing and CCTV will be implemented to minimise the risk of arson at the accommodation camps.
HR16	An Emergency Management and Response Plan would be prepared for construction that contains: - the procedures and protocols to ensure to appropriate responses to foreseeable on-site and off-site emergencies, including (but not limited to): - fire and hazardous material incidents - bushfire emergency including evacuation or relocation of workers to nominated safe refuge zones during a bushfire emergency either within or remote to the work zone - appropriate risk controls to mitigate potential risks to the health and safety of site personnel and first responders - protocols for the management of bushfire risk during construction, including fuel loads in the vicinity of proposal facilities. This includes restriction and/or prevention of certain activities that present bushfire risks on days with a fire danger rating of equal to or greater than 'high', and as directed by relevant state authorities - training requirements for construction workers, including training on bushfire risks and preventative actions (such as risks associated with operation (and maintenance) of vehicles, plant and equipment). The Emergency Management and Response Plan would be prepared for the entire project but would contain site-specific information procedures and protocols as required for individual sites. The plan would be developed in	All locations	Emergency Plan (45860-HSE-PL-D-0129)	An Emergency Plan (45860-HSE-PL-D-0129) has been prepared and forms part of the Environmental Management System for EnergyConnect (NSW – Eastern Section). The purpose of the Emergency Plan is to describe the approach that will be adopted during construction of the project to manage potential bushfire impacts to the project. The key objective of this plan is to detail management measures and inform site procedures for implementation so that the likelihood of a bushfire and its impacts are minimised and managed.

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Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
	consultation with Fire and Rescue NSW and the District Office of the Rural Fire Service. A minimum of two up-to-date copies would be kept in an accessible, dedicated location at each accommodation camp and construction compound. The Emergency Management and Response Plan would be implemented in the event of an emergency situation			
Soils, contamination and groundwater				
SCG5	Construction materials, spoil and waste would be suitably stored to minimise the potential for soil, groundwater or water quality impacts.	All locations	MM50 and MM51	Construction material will be appropriately stored to minimise erosion and sediment-related impacts
SCG8	All chemicals, fuels or other hazardous substances would 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 (during construction)	MM42 to MM44	Storage of chemicals, fuels or other hazardous substances are detailed in Section 7.3 and provided in Appendix D.
SCG9	The discovery of previously unidentified contaminated material will be managed in accordance with an unexpected contamination finds procedure.	All locations	MM52	If an unexpected contaminated material is discovered, the Unexpected Contamination Finds Procedure will be followed.
Waste management and resources				
WM4	All waste would be assessed, classified, managed and disposed of in accordance with the <i>Waste Classification Guidelines</i> (NSW EPA, 2014).	All locations	MM53	All waste to be assessed and classified in accordance with the EPA guideline prior to transportation.
WM5	Waste streams will be segregated, where feasible, to avoid cross contamination of materials and maximise reuse and recycling opportunities.	All locations	MM54	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	MM56	All waste generated which needs to be removed from the project will be transported to appropriately licensed waste disposal or transfer facilities

Reference	Revised mitigation measures	Application location(s) (from RMMs)	Where addressed	How addressed
Cumulative impacts				
CI2	Consultation with relevant local councils and other water supply operators would occur in relation to the proposal's water supply strategy to ensure there is effective management of these demands during construction and operation.	All locations	MM13	Discussions with existing local regulated water suppliers regarding water supply options have commenced and will be ongoing throughout the project where required.

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.	- 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	- 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.	- Impact to biodiversity in exceedance of the approved Project - Spread of weeds/impacts to native vegetation - Long term maintenance requirements	Major	Possible	19 – High	- 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.	- Hydrocarbon pollution - Potential regulatory action from agencies - Financial penalties - Reputational impacts	Major	Possible	19 – High	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.	- Excessive dust emission/deposition in surrounding environment - Air quality impacts exceed the approved project levels - Adverse biodiversity impacts - Reputational impacts	Moderate	Possible	13 - Moderate	- 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.	- Traffic delays on local and regional roads - Increased road safety hazard - Adverse reputational impacts - Increased noise and air quality impacts	Moderate	Likely	17 – High	- 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.	- Impact to biodiversity in exceedance of the approved Project - Spread of weeds/impacts to native vegetation - Long term maintenance requirements	Major	Possible	19 – High	- 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.	- Potential for irreparable damage to groundwater quality - Long term impacts to groundwater dependent species or ecosystems	Major	Unlikely	14 – Moderate	- 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.	- 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	- 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.	- 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	- 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.	- 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	- 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.	- Damage to construction site, works and accommodation camps - Project delays - Safety impacts	Moderate	Possible	13 - Moderate	- 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	All relevant project personnel would be trained on biodiversity management protocols and the requirements from this plan through inductions, toolboxes and targeted training	Operation	Environmental Manager, HSSE team	RMM B14
MM2	Sensitive area plans or GIS will include: - flora features, including threatened species and endangered ecological communities; - Aboriginal and non-Aboriginal heritage sites and items; - waterbodies/waterways and riparian zones; - existing utilities and services; and - any designated no-go zones. The sensitive area plans or GIS will be issued to relevant site personnel with updates issued as required.	Operation	Environmental Advisor, Environmental Manager	RMM B14
MM3	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	RMM B18
Aboriginal and non-Aboriginal Heritage				
MM4	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	RMM AH11 and NAH5
MM5	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	RMM AH11 and NAH5
Land use and property				
MM6	Prior to arriving on the project site, the supplier/owner of plant and equipment shall complete a Hygiene Inspection Form. If a Hygiene Inspection Form is not present or completed prior to arrival, one will be completed by the deliverer prior to inspection. All vehicles and mobile plant will be inspected on arrival at the construction compounds. A Hygiene Inspection Form with an assigned inspection number will be issued for vehicle / plant assets inspected as required. If plant or equipment arrives on the project site unclean it will either be washed down at the site compound or be removed from the project site by the supplier/owner and cleaned an appropriate facility.	Operation	Subcontractor/owner/suppliers Plant Department or delegate	RMM LP7

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EnergyConnect (NSW – Eastern Section) Accommodation Camp Management Plan - Dinawan

ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM7	Cleaning of vehicles and machinery will occur at designated washdown bays prior to movement onto the construction work areas or between properties (as required by the Property Management Plans).	Operation	All personnel	RMM LP7
MM8	The specific controls applicable to a property will be identified in consultation with the affected landholder, documented in a Property Management Plan as appropriate and implemented during all relevant site activities. The effectiveness of these controls will be regularly monitored.	Operation	Engagement Team, Environmental Manager	RMM LP8
MM9	If during construction, new infestations of notifiable weeds, pests or diseases are identified in project areas that are owned by Transgrid and/or occupied by SecureEnergy, the Environment Manager will notify Transgrid and will report the infestation to the relevant local control authority.	Operation	Environmental Manager	RMM LP9
Landscape and visual amenity				
MM10	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	RMM LV3
Social and economic				
MM11	A <i>Community Communication Strategy</i> (45860-HSE-DOC-D-0024) will be prepared and will outline the appropriate communication and engagement tools to engage with councils, landholders and community groups and will include a complaint handling processes.	Operation	Engagement Team	RMM SE1
MM12	A <i>Local Business and Employment Strategy</i> (45860-CM-PL-G-1004) will be prepared and will consider the local market conditions and capacity. The 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 followed to guide local opportunities during the operation and maintenance of the accommodation camps.	Prior to operation and during operation	Engagement Team	RMM SE3
Hydrology, flooding and water quality				
MM13	Water supply options and management will be undertaken in accordance with agreements with construction contractor and relevant suppliers.	Prior to operation and during operation	Supervisor	RMM HF5
MM14	Stormwater runoff and surface water flow from upslope areas will be divert around the accommodation camp site, where possible.	Prior to operation	Engineering team	Condition C19 b)

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM15	Drainage infrastructure at Dinawan accommodation camp would be designed to not materially worsen flood impacts downstream.	Pre-construction and Construction	Design Manager, Environmental Manager	Condition C19
Traffic				
MM16	Permits will be obtained from the National Heavy Vehicle Regulator (NHVR) for the movement of oversize and overmass vehicles as required. The permit applications will be supported by a Vehicle Movement Plan (VMP), prepared to indicate the proposed heavy vehicle route(s). The VMP will consider activities of adjoining land uses and safety of the public, particularly when entering urban areas from rural highways. All oversize and overmass vehicle movements will occur in accordance with permits from NHVR and associated VMP.	Operation	Supervisor	RMM TA3
MM17	All vehicle drivers including SecureEnergy staff, suppliers and subcontractors will follow the <i>Drivers Code of Conduct</i> provided in Appendix F5 of this plan.	Operation	All drivers	RMM TA5
MM18	Surface conditions at the site access/egress point from the sealed road network would be monitored during the operation of the camp. Any identified issues would be rectified where required.	Operation	Supervisor	RMM TA15
MM19	Existing site access points would be determined if they are feasible and reasonable for use during operation of the accommodation camp in consultation with the relevant landowner. Consultation with the relevant landowner and roads authority would occur if a new site access/egress point is required for the operation of the accommodation camp.	Operation	Engagement Team	RMM TA16
MM20	Access point will be removed at the completion of construction if the access point is not required for the operation of the Dinawan substation.	Operation	Supervisor	RMM TA17
Air quality				
MM21	Exposed and disturbed areas 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	RMM AQ1
MM22	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	RMM AQ1
MM23	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	RMM AQ1

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM24	Disturbed areas will be stabilised as soon as practicable and feasible to minimise the generation of dust emissions.	Operation	Environmental Advisor, Environmental Manager, Supervisors	RMM AQ1
MM25	All vehicles and machinery will be fitted with appropriate emission control equipment.	Operation	Plant operators, Supervisors	RMM AQ2
MM26	Where practicable and appropriate, 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	RMM AQ5
MM27	Waste bins containing screened material and sludge from wastewater treatment plant/processes will be placed as far away as practicable from the occupied buildings of the accommodation camp site.	Operation	Supervisors	RMM AQ5
MM28	Where practicable and appropriate, waste bins will be fully closed at all times when not in use.	Operation	Supervisors	RMM AQ5
MM29	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	RMM AQ5
Noise and vibration				
MM30	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	RMM NV4
Hazard and risk				
MM31	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 C44 d)
MM32	An 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	RMM HR2
MM33	All asset protection zones will be maintained to a grass height of 100mm or less. 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	Condition C45 RMM HR2

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
MM34	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 securely fixed to the external wall/s and buried into the ground, unless an alternative fire protection approach that achieves the same level of bushfire risk management is identified.	Prior to operation	Supervisor, Project Manager	RMM HR3
MM35	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	RMM HR4
MM36	All static water supply tanks will have an all weather access track with a minimum width of 4m.	Prior to operation	Supervisor, HSSE team	RMM HR4
MM37	Sources of potential ignition with the accommodation camp would be secured at the end of each working day to minimise the risk of arson.	Operation	Supervisor	RMM HR6
MM38	Consultation will occur with emergency services (the NSW Rural Fire Service and Fire and Rescue NSW) to ensure emergency access provisions are provided during operation.	Prior to operation	Environmental Manager, HSSE team	RMM HR7
MM39	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	RMM HR8
MM40	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	RMM HR9
MM41	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: - a water supply will be present (nine kilogram water fire extinguisher); and - a trained operator will be present.	Operation	Supervisor, HSSE team	RMM HR9
MM42	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	RMM HR11
MM43	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	RMM HR11
MM44	The following management measures will be implemented during chemical 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;	Operation	Supervisor, HSSE team	Good practice

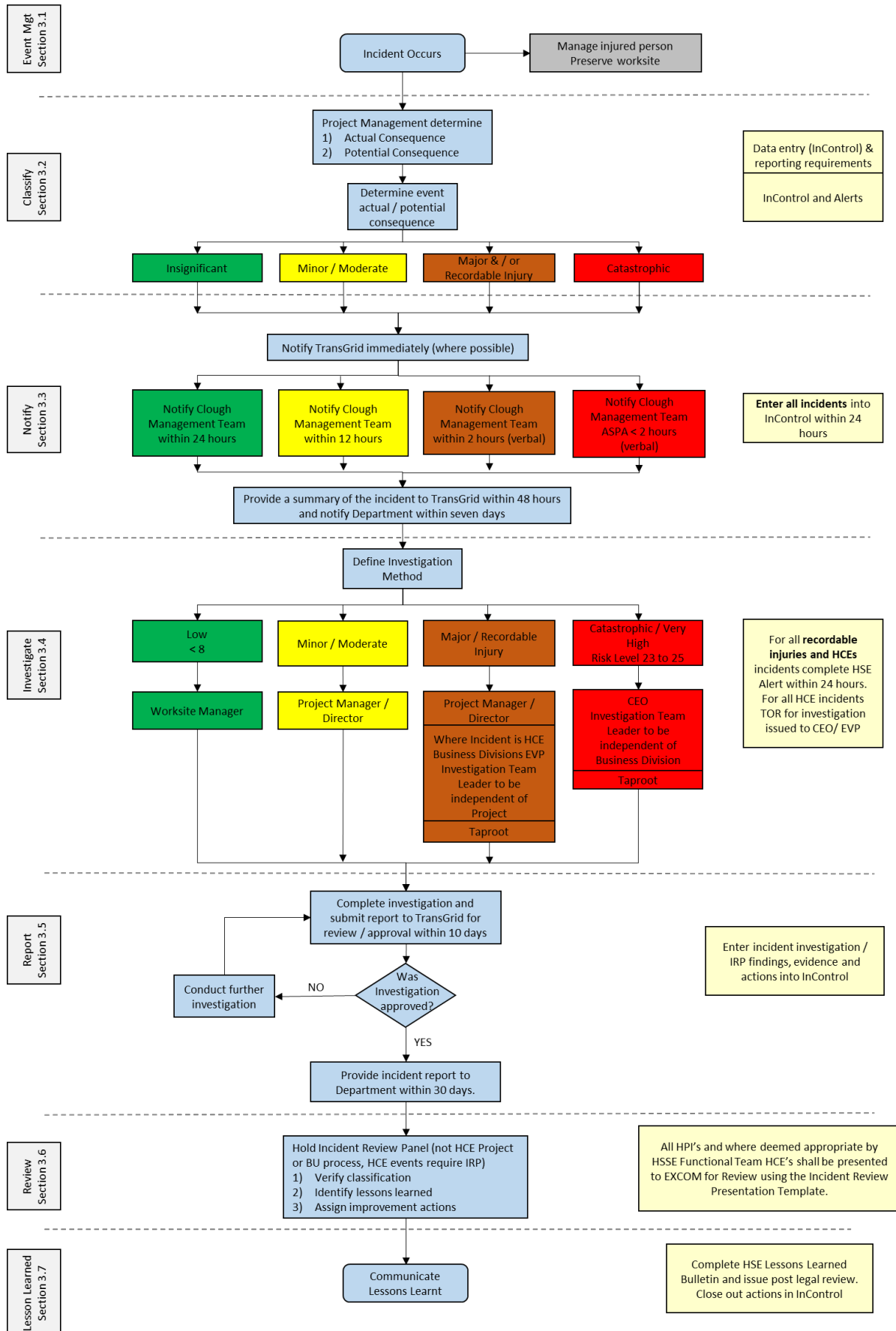
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ID	Measurement/Requirement	When to implement	Responsibility	Source document
	- store incompatible chemicals in separate storage areas if possible. Otherwise incompatible chemicals are to be separated with adequate spacing within the same storage areas; - 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.			
MM45	Service safety inspection, testing and tagging will be undertaken for electrical equipment in accordance with the relevant Australian Standard requirements to minimise potential electrical faults, including faulty power leads and generators.	Operation	Supervisor, HSSE team	RMM HR12
MM46	Dangerous goods and hazardous substances will be transported in accordance with relevant legislation and codes, including the Dangerous Goods (Road and Rail Transport) Act 2008, Road and Rail Transport (Dangerous Goods) (Road) Regulation 1998 and the Australian Code for the Transport of Dangerous Goods by Road and Rail (National Transport Commission, 2007).	Operation	Supervisor, Environmental Manager	RMM HR13
MM47	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	RMM HR8
MM48	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	RMM HR14
MM49	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	RMM HR15
Soils, contamination and groundwater				
MM50	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	RMM SCG8
MM51	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	RMM SCG5
MM52	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	RMM SCG10

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
Waste management and resources				
MM53	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	RMM WM4
MM54	Waste streams will be segregated, where feasible, to avoid cross contamination of materials and maximise reuse and recycling opportunities.	Operation	Supervisors	RMM WM5
MM55	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
MM56	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	RMM WM6

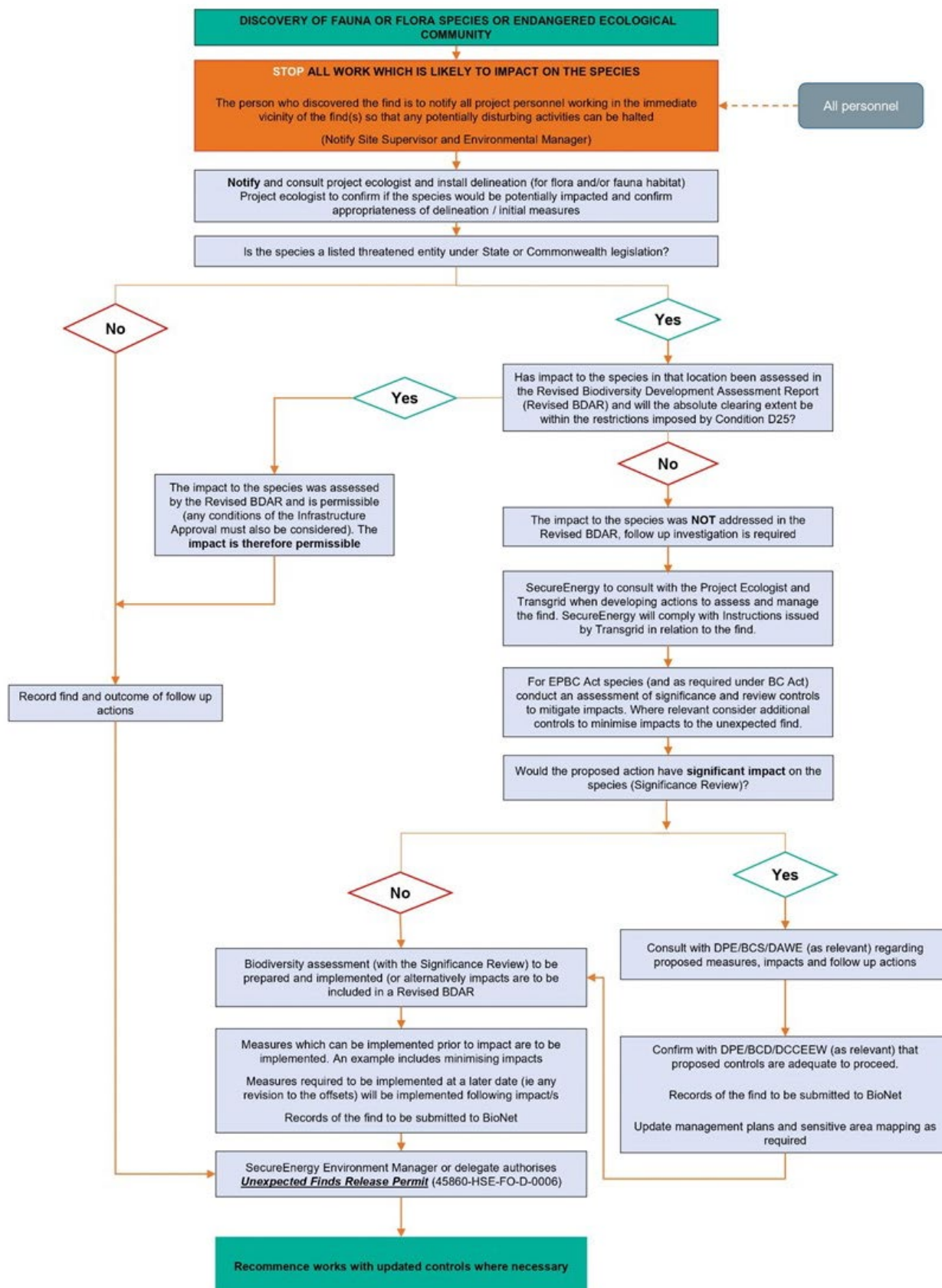
Appendix E – Incident, Notification and Investigation Procedure Flowchart



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Appendix F1 – Unexpected Threatened Species Finds Procedure

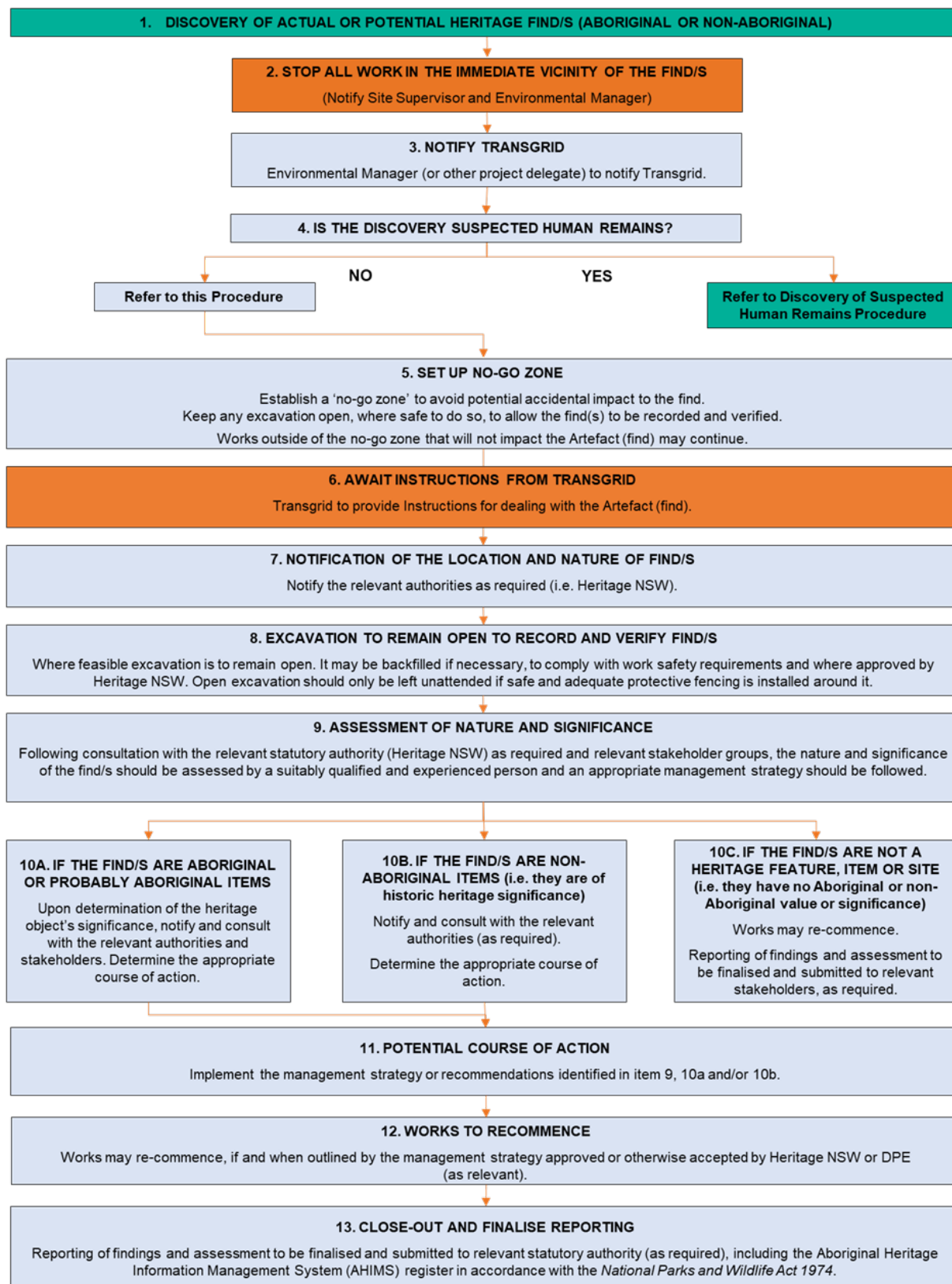
Biodiversity Management Procedure Unexpected Threatened Species Finds Procedure



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Appendix F2 – Unexpected Heritage Finds Procedure

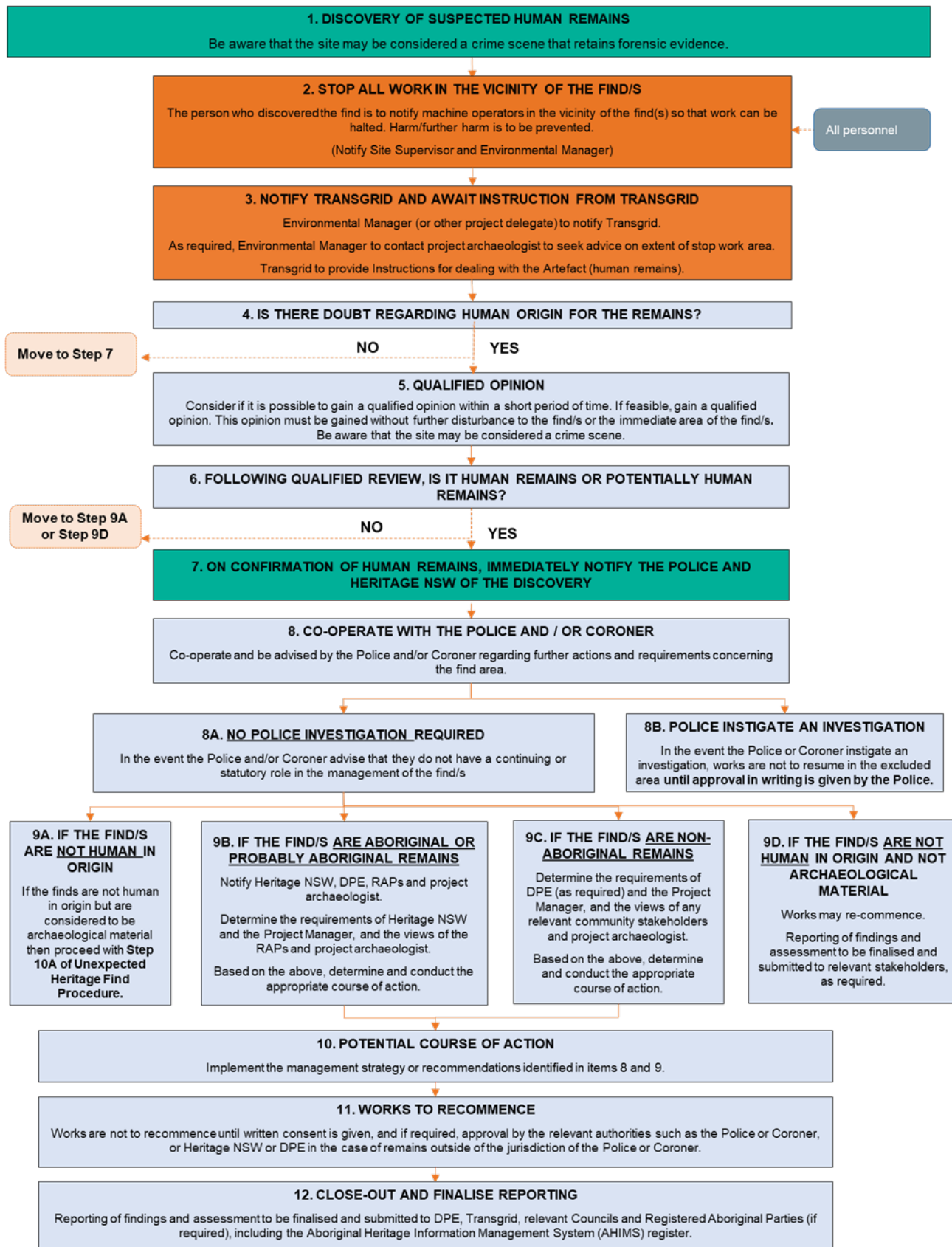
Heritage Management Procedure UNEXPECTED HERITAGE FINDS PROCEDURE



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Heritage Management Procedure

DISCOVERY OF SUSPECTED HUMAN REMAINS PROCEDURE

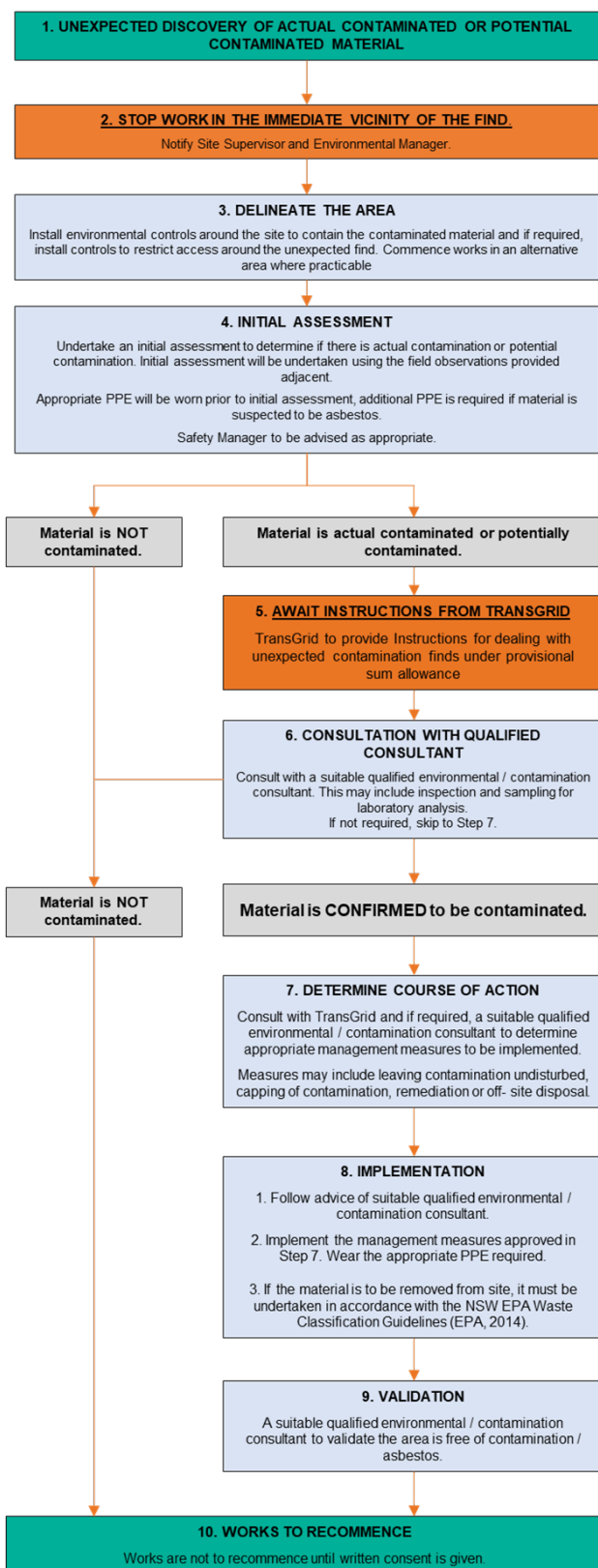


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Appendix F3 – Unexpected Contamination Finds Procedure

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 EnergyConnect (NSW – Eastern 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. Environment team to determine if any further reporting is required in accordance with Section 8 of the CEMP.
- HSE senior representative on site to call emergency services as required 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 a facility authorised to accept the waste. 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 Environment team will investigate and report the spill as required within Section 8 of the CEMP

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 HSSE Team, construction personnel and emergency response personnel
- Major incidents should refer to SecureEnergy's *Emergency Preparedness and Response Plan* (458060-HSE-PL-G-1015)

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Appendix F5 – Drivers' Code of Conduct



Driver's Code of Conduct EnergyConnect (NSW – Eastern Section)

Drivers obligations

- 1) Drivers MUST at all times:
 - adhere to all of the obligations required by law;
 - hold a current and appropriate licence for the class of vehicle they are operating;
 - drive at no more than the legal speed limit including those imposed by the project;
 - ensure the vehicle is roadworthy, registered, insured and well maintained;
 - comply with all construction and road work signs;
 - comply with all Oversize Overmass (OSOM) permits;
 - take the necessary and/or prescribed rest breaks so that operation of the vehicle is not affected by fatigue;
 - enter and leave the site with loads covered or contained;
 - operate the vehicle free from the effects of drugs and alcohol;
 - ensure that vehicles are operated calmly, safely and with a high degree of care and attention; and
 - operate vehicles in a manner that is suitable to the road and weather conditions including consideration for the likelihood for encountering wildlife. In the event of a fauna strike on a gazetted road, drivers are to follow item 8) below.
- 2) There shall be no littering from a vehicle. Rubbish is to be disposed of in appropriate bins.
- 3) Drivers are to notify their employer or operator immediately should the status or conditions of their driver's licence change.
- 4) Drivers must ensure they can be contacted at all times when on duty, either through ultra high frequency (UHF) radio or other handsfree devices. Vehicle specification requirements for UHF radio or satellite phones are found in the *Driving and Journey Management Work Instruction* (45860-HSE-WI-G-0041).
- 5) Drivers are to give due consideration to the public at all times. This includes:
 - behaving and driving professionally at all times; and
 - responding courteously if approached by members of the public and directing them to the EnergyConnect community contact number (1800 490 666).
- 6) Fatigue will be managed in accordance with the *Driving and Journey Management Work Instruction* (45860-HSE-WI-G-0041).
- 7) Fitness to drive will be managed in accordance with *Driving and Journey Management Work Instruction* (45860-HSE-WI-G-0041).
- 8) Fauna strikes are to be reported to your Supervisor. The Supervisor is to ensure these details are reported to the Environment team.



Additional requirements for heavy vehicles or over dimension vehicles

In addition to the general driver requirements, all heavy or over-dimension vehicle drivers are to comply with the additional requirements related to heavy vehicles.

- 1) Drivers MUST at all times:
 - adhere to their Chain of Responsibility requirements;
 - ensure the heavy vehicle is operated within its legal mass and dimension limits;
 - adhere to any permit to travel requirements;
 - adhere to direction of road authorities and OSOM permit; and
 - adhere to the designated over-dimensional and heavy vehicle routes.
- 2) Drivers are to take regular rest breaks to manage fatigue and breaks of no less than the minimum periods prescribed by the National Heavy Vehicle Regulator.
- 3) Convoys and congestion can have a large impact on the local community, motorists and road authority operations. Drivers are to avoid forming convoys where other road users are limited in vehicle movements by no-break in heavy vehicles.