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## **PART A – OVERVIEW**

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### **1. INTRODUCTION**

#### **1.1. Purpose**

This Environmental Management Plan (EMP) (US-050052-ENV-MP-001) details how Ventia will achieve environmental compliance and beyond at the Soil Washing Plant (herein the Project) located at the Taylors Rd landfill (the Site) by the application of the Veolia Integrated Management System (IMS) and Ventia's operational procedures.

Information provided in this EMP is, to the best of Ventia's knowledge, complete and correct at the time of writing.

#### **1.2. Objectives**

The objectives of this plan are to:

- Identify the environmental obligations attached to the project and the hazards and risks associated with the works;
- Assist in the prevention of unauthorised environmental harm;
- Prevent the release of dusts, contamination, contaminated soils, contaminated sludges, contaminated water, hazardous chemical, odours and vapours at the Project (i.e. Site);
- Protect both on and off-site waters near the Site from being polluted by on-site sources throughout performance of the Project activities;
- Prevent the entry of all contaminated materials, detritus, rubbish, soil, concrete, rubble, hydrocarbon, liquid waste, solid garbage or human waste into drains and waterways;
- Comply with all relevant environmental legislation such as Environment Protection Act (2017)
- Minimise negative impacts on the community that relate to environmental impacts;
- Identify and implement feasible opportunities to reduce environmental impacts that are beyond contractual and compliance requirements;
- Fulfil Veolia's EMS requirements, enabling continued certification to ISO 14001:2015 and contribution to Veolia's overall business plans; and
- Establish a continual improvement framework for managing the Site

#### **1.3. Management Structure**

The management of the facility will be in line with the structure at the adjacent EarthSure Thermal Treatment Facility. This will be a continuation of the Veolia Ventia Joint Venture (SVJV) known as EarthSure. As such, Veolia will retain overall control of the facility and hold the site licences and permits, while Ventia will manage site operations in accordance with this EMP. As a result, while the overarching management system applied to the facility will be Veolia's, Ventia will maintain control over operational decision making.

This is reflected in this EMP, with Veolia management systems and Ventia operational procedures referred to below.

This EMP is a Ventia document.

## **1.4. Project Background**

The project will establish a soil washing plant on an existing waste management site in Melbourne's southeast (Taylors Rd Landfill). The soil washing plant will transform contaminated soils into beneficial reuse products. It will be managed by EarthSure, a joint venture between Veolia, a market leader in waste management, and Ventia, a leading provider of contaminated land remediation services. This partnership is successfully operating the nearby Thermal Treatment Facility.

The soil washing plant will be established on underutilised, capped and well settled former landfill cells. It will provide a cost effective and sustainable reuse solution, particularly for Category C soils. The output of the soil washing plant is predominantly construction materials, that can be reused in other industries. The waste concentrate from soil washing will be treated at the nearby EarthSure Thermal Treatment Facility. Aggregate, sand and road base, all products in high demand, can be reused in infrastructure and building projects.

This project will relocate a 30 tonne per hour soil washing plant, owned by Ventia and operating in South Australia, to Veolia's Taylors Road site. The plant will divert ~160,000 tonnes of Category C soils from landfill per annum. It is estimated that greater than 98% of the soils will be beneficially reused as construction materials.

Apart from the treatment technology, the other key infrastructure required is controlled storage areas for the feedstocks and products of soil washing. The project will require storage for up to 200,000 tonnes of feedstock, particularly to cater for the surge demands of large infrastructure projects. There is a high demand for many of these materials because of the State Government's extensive infrastructure program.

The primary objectives of the Project are to:

- Recycle Category C soils to achieve clean products in accordance with Australian Standards
- Process soil in a manner which maximises efficient use of resources and minimises generation of waste.
- Implement appropriate materials tracking data, including waste classification processes;
- Manage the collection of any surface water or groundwater to ensure further contamination or migration of contamination does not occur;
- Manage activities in accordance with all relevant environmental and work health and safety requirements;
- Manage the facility in a cost-effective manner; and
- Comply with all regulatory and legislative requirements

## **1.5. Scope of Works (SOW)**

The scope of works for the site is summarised below:

- Site establishment and civil works for the Soil Washing Plant and stockpile areas (fencing, environmental controls, etc.)
- Supply, installation and commissioning of the Soil Washing Plant
- Construction of feed and treated soil storage areas

The location of the SWP and stockpiles are identified in **Annex E** Environmental Control Plan.

## 1.6. Source of Feedstock

Soil sources will likely be from major infrastructure developments around Melbourne. Imported soil will be stored in the stockpile areas. Transport of this soil to and from Taylors Rd will be managed with appropriate regulatory approval and waste tracking requirements.

## 1.7. Approvals

Ventia shall be responsible for complying with any Project approvals including permits, certificates, consents and authorisations under Commonwealth, State and Territory and local government law.

The Project Manager shall maintain the updated Project Permits Register and Program.

## 1.8. Environmental Management Plan Map

Ventia has prepared numerous other documents related to the project, which could provide further relevant information if required, as described in the following table.

| Plan / sub-plan  | Revision | Date       | Description   | Location           |
|--|----------|------------|---|--------------------|
| Construction Environmental Management Plan (US-050052-ENV-MP-001)  | 6        | 26/09/19   | <ul style="list-style-type: none"> <li>- Environmental risks</li> <li>- Environmental controls</li> <li>- Roles and responsibilities</li> </ul>   | Stand-alone report |
| Health and Safety Management Plan (US-050052-HS-MP-001)            | 1        | 18/02/19   | <ul style="list-style-type: none"> <li>- Health and safety procedures</li> <li>- Roles and responsibilities</li> </ul>  | Stand-alone report |
| Project Overview and Quality Management Plan (US-050052-QS-MP-001) | 1        | 18/02/19   | <ul style="list-style-type: none"> <li>- Project overview</li> <li>- Project framework</li> </ul>   | Stand-alone report |
| Trial Performance Plan (US-050052-ENV-TPP-001)                     | B        | 26/02/2019 | <ul style="list-style-type: none"> <li>- Detailed material handling and tracking process</li> <li>- Clarification on waste streams</li> <li>- Sampling analysis and quality plan</li> <li>- Performance criteria</li> </ul> | Stand-alone report |
| Emergency Response Management Plan (US-050052-HS-MP-002)           | 2        | 18/02/19   | <ul style="list-style-type: none"> <li>- Emergency procedures</li> </ul>  | Stand-alone report |

# ADVERTISED PLAN

| Plan / sub-plan  | Revision | Date     | Description   | Location           |
|--|----------|----------|---|--------------------|
| Traffic Management Plan (US-050052-OPS-MP-002)                           | 3        | 17/10/19 | <ul style="list-style-type: none"> <li>- Traffic management</li> <li>- Vehicle Movement Plan</li> </ul>   | Stand-alone report |
| Excavation and Stockpiling Management Plan (US-050052-OPS-MP-003)        | F        | 06/09/19 | <ul style="list-style-type: none"> <li>- Dilapidation survey requirements</li> <li>- Excavation process</li> <li>- Stockpiling process and design</li> <li>- HAZOP summary</li> <li>- Decontamination procedures</li> </ul> | Stand-alone report |
| Foreign Object Debris (US-050052-ENV-GL-006)                             | B        | 17/10/18 | <ul style="list-style-type: none"> <li>- FOD risks and controls</li> </ul>  | Stand-alone report |
| Sustainability Management (US-050052-ENV-GL-001)                         | 1        | 23/15/19 | <ul style="list-style-type: none"> <li>- Sustainability initiatives</li> </ul>  | Appendix to CEMP   |
| Soil and Water Management (US-050052-ENV-GL-002)                         | 4        | 06/09/19 | <ul style="list-style-type: none"> <li>- Soil and water management</li> <li>- Erosion and sediment controls</li> </ul>  | Appendix to CEMP   |
| Hazardous Chemicals and Spill Response Management (US-050052-ENV-GL-003) | 0        | 02/11/18 | <ul style="list-style-type: none"> <li>- Hazardous chemical risks</li> <li>- Hazardous chemical controls</li> </ul>   | Appendix to CEMP   |
| Biodiversity Management (US-050052-ENV-GL-004)                           | 2        | 06/09/19 | <ul style="list-style-type: none"> <li>- Biodiversity risks and controls</li> </ul>   | Appendix to CEMP   |
| Indigenous and Cultural Heritage Management (US-050052-ENV-GL-005)       | 3        | 06/09/19 | <ul style="list-style-type: none"> <li>- Indigenous and cultural heritage risks and controls</li> </ul>   | Appendix to CEMP   |
| Air Quality Management (US-050052-ENV-GL-008)                            | 1        | 06/09/19 | <ul style="list-style-type: none"> <li>- Air quality risks and controls</li> </ul>  | Appendix to CEMP   |
| Noise and Vibration Management (US-050052-ENV-GL-009)                    | 1        | 06/09/19 | <ul style="list-style-type: none"> <li>- Noise and vibration risks and controls</li> </ul>  | Appendix to CEMP   |
| Waste Management (US-050052-ENV-GL-010)                                  | 1        | 14/11/18 | <ul style="list-style-type: none"> <li>- Waste risks and controls</li> </ul>  | Appendix to CEMP   |

## 1.9. Environmental Guidelines (subplans)

This plan is the base reference document which addresses Ventia’s environmental management system requirements and will be supported by a number of environmental subplans (see Annex F Sub-Plans). These sub-plans will be developed following confirmation of final site and licence conditions, to document how each environmental risk will be managed.

Environmental Guidelines will include:

- Sustainability Management (US-050052-ENV-GL-001) incorporating energy and greenhouse gas management;
- Soil and Water Management (US-050052-ENV-GL-002) incorporating contaminated land management;
- Waste Management Plan (US-050052-ENV-GL-010);
- Hazardous Chemicals and Spill Response Management (US-050052-ENV-GL-003);
- Biodiversity Management (US-050052-ENV-GL-004) incorporating weed and pest management, flora and fauna management;
- Air Quality Management (US-050052-ENV-GL-008) incorporating dust suppression; and
- Noise and Vibration Management (US-050052-ENV-GL-009).

## 1.10. Plan Structure

The Environmental Management Plan has the following structure:

### Part A – Overview

The plan overview comprising:

- Introduction to the EMP and the Project
- Project Environmental Management System
- Compliance Requirements and Project Environmental Performance Targets
- Listing of the likely significant environmental hazards (SEH) and identified environmental guides

### Part B – Implementation Plan

An implementation plan that describes:

- How Ventia will meet each element and expectation
- Responsibilities for each expectation
- The procedures and deliverables for each expectation

### Annexures

Provides the supporting detail behind the methodology and systems to support the implementation plan including the sub-plans associated with this CEMP

### 1.11. Definitions

Definitions for terms used in this document are included in Annex A.

### 1.12. Distribution and Authorisation

This plan is issued in accordance with Ventia Process: [Develop/Update Project Management Plans](#) and shall be communicated to all project personnel.

Revisions are approved and issued along with an updated record of revisions. Revisions to the plan are made in accordance with Ventia Process: [Establish Documented Information Management System](#). As required, revisions to text are denoted by 'track changes'. Tracked changes are then approved by the Project Manager who shall arrange the release of the new revision in VenDocs.

All documentation produced by Ventia conforms to the requirements as outlined in Ventia's Business Management System (BMS) and Business Processes which are located in InVentia and VenDocs.

Revisions are distributed to all holders of controlled copies and communicated via email to the users of the intranet-based system. It is the responsibility of the persons receiving the revision to update the workplace management plan assigned to them and to destroy obsolete copies of all amended pages.

The documents contained on InVentia and VenDocs shall always remain up-to-date and current. Any documents printed from the BMS are considered UNCONTROLLED.

#### Authorisation

The implementation of the plan is under the authority of Ventia Utility Services (herein Ventia) and the Project Manager. All personnel employed on the project will perform their duties in accordance with the requirements of this plan and related procedures.

The Environmental Management Plan will be further developed and revised during its use on the project to address:

- Any changes in the work scope which may affect the control of works or added high risk
- Changes in technology and work methods to improve processes
- Changes identified by continual improvement
- Changes in legislation that requires amendments to this plan.

The Project Manager will review this plan (and the environmental subplans) with the assistance of senior project staff at regular intervals (minimum annually or at least once within the project period).

## 2. FACILITY DESCRIPTION

### 2.1. Site Activities

The location on which the facility is to be located is an existing licensed facility, Taylors Rd landfill. The existing operating licence no. OL000070542 (Taylors Rd Landfill) and operating licence no. OL000211831 (EarthSure thermal treatment facility) are located on the same parcel of land. The location is also subject to a current proposal to establish a Product Destruction Unit for packaged organic material. An overview of the site is included in Annex D - Base Layout Map.

The SourceZone® soil washing technology was developed by Ventia to deliver a solution for processing low level contaminated soils for reuse and recycling. The use of soil washing is acknowledged to be highly successful in Victoria and other similar plants have been operating for a number of years.

The soil washing facility will receive soils and stockpile them. Soil production from major infrastructure projects typically occurs in “bursts” where the material is generated at a high rate. The materials are generated in the early stages of the project when bulk earthworks are being undertaken. Many of the current suite of major infrastructure projects (North East Link, Suburban Rail Loop, Westgate Tunnel) are in heavily space-constrained brownfields sites and cannot manage soil stockpiles within the project boundaries.

The proposed Soil Washing Plant site has been designed to progressively fill a series of untreated soil stockpile bays. The material will be received in a dedicated receival area before being transported to an engineered stockpile. The receival area will function as a waste triage area to enable materials to be sorted into the appropriate stockpiles or sent directly to the soil processing facility. The receival area will also allow the quarantining of materials for further testing or disposal (if necessary). These measures will allow the site to control:

- Emissions of noise and dust
- Quality of material including sorting into stockpiles and rejecting loads if necessary
- Vehicle queueing and maximising site efficiency
- Interaction between mobile plant, pedestrians and vehicles delivering material
- The flow of material to the processing plant.

The receival area design is based on the experience Veolia has in operating facilities such as the adjacent EarthSure facility treating Category A and B soils. The stockpiles of treated material include a quarantine and testing area to further assess the product quality prior to the material being sold off site. The physical separation of the stockpiles from the untreated stockpile areas ensures that the material is less likely to be cross contaminated through mixing materials.

The site is located on Cells 2 and 5 of the Taylors Rd landfill as these are the older and more well settled cells on the site, minimising the likelihood of settlement caused by the stockpile load resulting in damage to the existing cap. As stockpiles are filled, the condition of the landfill cap will be monitored, and remediation will be carried out if necessary. During construction, landfill gas and leachate wells will be decommissioned if necessary and reinstalled in locations not obstructed by the SWP or supporting infrastructure.

## **2.2. Surrounding Land Use**

The site is located in an Industrial 1 (INZ1) planning zone, on top of capped landfill cells of the Taylors Rd landfill. Surrounding land use is also industrial with the nearest residential zone approximately 900m east of the site’s eastern boundary. A public conservation and resource zone (PCRZ) exists immediately north of the site and is known as the ‘Frank Pellicano Reserve’. Majority of the surrounding land use is warehousing and factory uses:

## **2.3. Potential Sensitive Receptors**

Veolia has a long-established Community Reference Group for the Taylors Rd landfill site. This group has been notified of the potential for a facility to be established on the site, and a full Community Engagement Plan has been completed, with a community engagement specialist (Spence Consulting) engaged to undertake extensive community consultation regarding the facility.

The nearby potential human health sensitive receptors include:

- Site workers and site visitors

- General public and workers in adjacent industrial facilities
- Nearest residential receptor is approximately 900m east of the eastern site boundary

The nearby potential ecological sensitive receptors include:

- Surface water: There is an Urban Flood Zone approximately 450m west of the south-western site corner and Eumemmering Creek is located approximately 1,850m west of the site's western boundary
- Groundwater: according to Visualising Victoria's Groundwater, the groundwater at the site is <5m below ground level.
- Flora and fauna: Frank Pellicano Reserve immediately north of the site

### 3. COMPLIANCE

Ventia will comply with all relevant standards applying to the project.

The EMP has been prepared in accordance with the following requirements:

- Environment Protection Act (2017)
- Environmental Reference Standards, EPA
- Australian and New Zealand Guidelines for Fresh and Marine Water Quality
- CSIRO 1999, Urban Stormwater Best Practice Environmental Management Guidelines.
- EPA Victoria 1991 Construction Techniques for Sediment Pollution Control, Publication No: 275
- EPA Victoria 2015 Stormwater and protection our water ways Fact Sheet, Publication 1304.1 March 2015
- EPA Victoria 2020, Civil construction, building and demolition guide, Publication 1834 November 2020
- EPA Victoria 2020, Noise Control Guidelines, EPA Publication 1254.2, December 2020
- EPA Victoria, 2021 Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues, EPA Publication 1826.4, May 2021
- EPA Victoria, 2018 Liquids Storage and Handling Guidelines, EPA Publication 1698, June 2018
- Standards Australia 1995 Piling Design and Installation
- Standards Australia 2009, AS/NZS ISO 31000:2009 Risk management— Principles and guidelines
- Sustainability Victoria 2019, Guide to Better Practice at Resource Recovery Centres
- Environment Protection Regulations 2021
- Catchment and Land Protection Act (1994)
- Planning and Environment Act (1987)
- Public Health and Wellbeing Act (2008)
- Work Safe Victoria 2010 Asbestos-Contaminated Soil Guidance Note

If any environmental incidents occur, they will be managed in accordance with Veolia's Incident Management System.

## 4. VEOLIA HEALTH AND SAFETY MANAGEMENT SYSTEM

### 4.1. Environmental System Overview

Veolia has a robust Environment, Quality and Safety (EQS) Integrated Management System certified to Australian and international standards – AS4801, ISO9001 and ISO14001. The EQS Management System is applied in everything we do and helps ensure that our workers, contractors on our sites and those undertaking work on our behalf, do so in a safe and environmentally responsible manner.

We are committed to applying risk management principals to support the identification and control of hazards and risks that may arise from our business operations – this applies to our customers, our workers, the community and the environment. Customer focused risk management tools play an important role in how we deliver services in a safe and controlled manner.

Our specialised Environment, Quality and Safety teams work at all levels of the business to support our operations in maintaining best practice and compliance with legislative and regulatory requirements. A focus on high standards of induction, training and competency across the business gives Veolia confidence in the ability of its workers to meet ours and our customers' expectations in safety and environmental compliance and management.

We also hold certification to a number of standards and regulatory bodies to certify that our business is managed effectively and to the highest levels possible. These include certification to the National Heavy Vehicle Australian Standards for both Maintenance Management and Basic Fatigue Management, and certification to the Product Quality standards AS4454 and AS4419 for applicable sites.

Veolia has implemented 'Our Lifesaving Rules' which reflect the high-risk activities undertaken on our sites and in the services we provide. The Lifesaving Rules help ensure that all workers are committed to staying safe in everything they do and that the services we provide are conducted in the safest manner possible for our customers.

Our integrated Environment, Quality and Safety Management System (EQSMS) is third-party certified by SAIGlobal, the certification body of Standards Australia.

The following accreditations are also integrated into the EQS Management System:

- Fatigue Management (under the National Heavy Vehicle Accreditation Scheme NHVAS)
- Maintenance Management (under the NHVAS)

### 4.2. Governance Documentation

The Ventia 'SHEQ Policy' provides the principles we will apply in operating our business to achieve our environmental performance objectives and targets.

The Elements and Expectations provide more specific detail on what we expect in managing the environment. This is the layer of governance most directly applicable to contracts and against which all contracts must be able to demonstrate compliance at all times.

### 4.3. Environmental Rules

Environmental rules for the provision of services are determined using Ventia's Visions, Values and Purpose. These include:

- We do not start any work without relevant environmental approvals, permits or licences in place;
- We know our obligations and have controls in place to meet these obligations;

- We do not start any work without assessing environmental risks and ensuring suitable controls are in place;
- We follow all procedures;
- We report all environmental incidents;
- We comply with all relevant environmental legislation immediately;
- We hold each other accountable for environmental management; and
- We understand our usage of energy and water and plan to use it in the most efficient manner practical.

## 5. IMPROVEMENT

Continual improvement is fundamental to delivering success and for this Project, Ventia has tailored our continual improvement approach to include the principles of lean thinking continual improvement methodology.

We see 'lean' thinking as a proven business improvement concept that:

- Provides a rapid and systematic approach to process improvement;
- Facilitates understanding and continual assessment flow of materials, processes and information; and
- Identifies essential day-to-day processes.

The outcomes of using this approach include:

- Training of our staff in continual improvement practices;
- Improved ability to track and communicate success across the contract; and
- Reduced costs.

Our dedication to deliver quality services results in the constant development of efficiencies across all elements of our business.

## 6. ELEMENTS AND EXPECTATIONS

### 6.1. Explanation

This Environmental Management Plan is based on a set of 12 Elements that describe Ventia' requirements for environmental management. Each Element is supported by a short intent statement and a set of Expectations or key outcomes to be delivered as part of that element.

- **Element** – Key aspects for managing this function on the Project
- **Intent** – A one-line statement describing the overall purpose of the Element
- **Expectation** – The outcomes achieved as part each Element

This structure is applied consistently across all Ventia management plans. The Elements and Expectations are defined below.

#### ELEMENT 1. LEADERSHIP, ACCOUNTABILITY AND CULTURE

---

##### *Expectations*

- 1.1. Environmental accountabilities, roles and responsibilities for managers, staff, employees and subcontractors are clearly defined, documented and communicated
- 1.2. Environmental leadership and commitment is demonstrated through measurable participation in environmental management
- 1.3. Environmental expectations are clearly defined with appropriate reward and disciplinary processes in place

#### ELEMENT 2. PLANNING

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We will formally and systematically plan for effective environmental management on the project.

##### *Expectations*

- 2.1. Adequate resources are provided to effectively implement the EMP
- 2.2. IT Systems are defined and established
- 2.3. Environmental sub-plans are prepared for significant environmental hazards
- 2.4. Work is planned and executed to ensure compliance
- 2.5. Inspections, observations and monitoring are performed to ensure compliance is maintained
- 2.6. All energy and greenhouse data collected and entered into JDE
- 2.7. Personnel on the site have access to current versions of relevant legislation, standards and codes of practice

#### ELEMENT 3. LEGAL COMPLIANCE

---

We will comply with all applicable safety legislation, standards and codes of practice

##### *Expectations*

- 3.1. All necessary environmental approvals are obtained prior to commencing relevant works and surrendered on completion
- 3.2. All non-compliances are reported as incidents

#### ELEMENT 4. RISK MANAGEMENT

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We will use a risk management approach during all stages of the project to identify, assess, control and review environmental risks and harness opportunities

##### *Expectations*

- 4.1. Systematic processes are defined and implemented for identifying environmental risks and opportunities at all stages of the project
- 4.2. Identified risks and opportunities are analysed and evaluated according to agreed criteria and recorded in a risk register

- 4.3. Environmental controls appropriate to the level of risk are identified, documented and implemented
- 4.4. Feasible opportunities are implemented
- 4.5. Identified environmental risks and controls are communicated to all relevant personnel
- 4.6. Regular inspections and monitoring are conducted to check effectiveness of controls
- 4.7. Environmental risks and controls are regularly reviewed

#### **ELEMENT 5. CHANGE MANAGEMENT**

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We will identify and manage environmental consequences arising from permanent and temporary changes to the project's planned operations

##### *Expectations*

- 5.1. Changes to the planned operations that have potential environmental consequences are identified
- 5.2. Risks associated with identified changes are assessed and controlled before changes are implemented
- 5.3. All changes with environmental consequences are authorised before they are implemented
- 5.4. Controls associated with change are communicated to all affected personnel

#### **ELEMENT 6. COMMUNICATION, CONSULTATION AND WHS COMMITTEES**

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We will effectively and openly communicate and consult with external and internal stakeholders to create an environment of trust, openness and involvement

##### *Expectations*

- 6.1. External environmental stakeholders are identified
- 6.2. Relationships with external stakeholders are effectively managed
- 6.3. Internal consultative forums are established with regular meetings scheduled, conducted, documented and communicated
- 6.4. Environmental complaints and enquiries are recorded and responded to appropriately
- 6.5. The effectiveness of internal and external stakeholder engagement is evaluated and improved

#### **ELEMENT 7. TRAINING AND COMPETENCY**

---

We will ensure that all personnel working on the project are competent to perform their duties safely

##### *Expectations*

- 7.1. All personnel have completed an induction containing relevant environmental information before they are authorised to work on the project
- 7.2. A training plan is developed and documented
- 7.3. Personnel are trained and assessed according to the training plan
- 7.4. Training records are maintained and accessible to relevant personnel

#### **ELEMENT 8. SUBCONTRACTOR AND SUPPLIER RELATIONSHIPS**

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We will build effective relationships with our subcontractors and suppliers to ensure they positively contribute to the safety of our project

##### *Expectations*

- 8.1. Selection processes ensure that subcontractors meet Ventia's minimum environmental requirements
- 8.2. Planning requirements of all subcontractor work scopes are completed and communicated prior to commencing work
- 8.3. Subcontractor documentation is submitted and reviewed to meet project requirements
- 8.4. Subcontractors actively participate in environmental management on the project
- 8.5. Subcontractors are reviewed to assess their performance and compliance with our minimum environmental requirements

**ELEMENT 9. INCIDENT MANAGEMENT**

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We will effectively respond to, report, and investigate all incidents. We will take appropriate corrective and preventative actions and share associated lessons

*Expectations*

- 9.1. All incidents are followed by appropriate response and notification
- 9.2. All incidents are entered into and closed out in the SHEQ Ven-Safe system
- 9.3. Incident investigations are conducted appropriate to the type of incident
- 9.4. All personnel conducting incident investigations are trained to competently perform the task
- 9.5. Corrective and preventative actions are taken after incidents and lessons are shared with other projects

**ELEMENT 10. EMERGENCY PLANNING AND RESPONSE**

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We will actively prepare for and respond to emergencies

*Expectations*

- 10.1. Potential emergencies are identified using a formal risk assessment process
- 10.2. Emergency response plans and procedures are developed and regularly reviewed
- 10.3. Adequate resources are provided to effectively implement emergency response plans and procedures
- 10.4. Environmental emergency response drills are conducted
- 10.5. Employees, contractors and visitors are given appropriate emergency response training

**ELEMENT 11. DOCUMENT AND RECORD MANAGEMENT**

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We will maintain accurate documents and records relevant to our environmental management system

*Expectations*

- 11.1. Current versions of all relevant documents and records are available and controlled
- 11.2. Documents and records are stored in appropriate systems
- 11.3. Regular management reviews are conducted to determine the effectiveness of the EMP

**ELEMENT 12. AUDITING, REVIEW AND IMPROVEMENT**

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We will continually improve our environmental systems and environmental performance by monitoring and reviewing their effectiveness

*Expectations*

- 12.1. Environmental performance trends are identified, and corrective actions are implemented as required
- 12.2. A monthly environmental report is produced and distributed

**7. PROJECT OBLIGATIONS AND TARGETS****7.1. Compliance with Requirements**

This plan provides a strategic approach when effectively managing all environmental risks associated with the project. The objectives and targets set out in this plan ensure that all potential environmental risks and opportunities are adequately identified, assessed and managed. This plan complies with, as a minimum:

- The Ventia Business Management System (BMS);
- AS/NZS ISO 14001:2015 Environmental management systems – Requirements with guidance for use; and
- All applicable Australian laws.

Specific environmental legislation associated with our activities is listed within the Project's subplans where the key environmental risks and controls are documented.

## 7.2. Expectations

Throughout the project necessary environmental licences, permits, certificates, consents and authorisations under Commonwealth, State and Territory and local government laws may be required to perform certain environmental functions on the projects, such as a trade waste discharge licence. Any environmental conditions associated with these licences, permits, approvals or consents shall be updated into the Project Environmental Obligations Register.

## 7.3. Corporate Performance Measures

## 7.4. Roles and Responsibilities

Roles and responsibilities are detailed in Annex B of this plan.

## 7.5. Reporting

Ventia will issue management reports on the status of works throughout the duration of the project. Details of specific details required in these reports is outlined in Annex F of this CEMP.

# 8. ENVIRONMENTAL RISKS

Key environmental risks have been identified through the review of community and EPA compliance requirements. In accordance with Ventia processes and procedures, a risk assessment of the potential environmental aspects and associated impacts has been completed for the scope of work on this project, taking into account both severity and likelihood. This is recorded in the Project Risk Assessment.

## 8.1. Environmental Aspects, Impacts and Relevant Controls

The terms 'environmental aspect' and 'environmental impact' are defined below:

**Environmental Aspect** – Element of an organisation's activities, products or services which can interact with the environment.

**Environmental Impact** - Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisations activities or products.

Environmental risks that details project activity, aspect, impact, risk category, mitigation measure, residual risk and accountability are detailed in Annex C Project Risk Register(US-050052-HS-REG-005).

## 8.2. Hierarchy of Controls

All risks identified in the guidelines and in the provision of services under the contract will be managed through use of controls. Selection of appropriate controls will be based upon the hierarchy of controls which provides a range of hazard control methods arranged in order of implementation preference.

More than one control method must generally be used to control a hazard. The table below provides a description of each level of control from most preferred, elimination to least preferred (PPE).

| Control     | Description   | Example                         |
|-------------|---|---------------------------------|
| Elimination | Remove the hazard so the consequence is essentially zero. This is | Removal of malfunctioning plant |

| Control                             | Description   | Example  |
|-------------------------------------|---|--|
|                                     | the most effective control measure and is always be considered first.   | Disposal of hazardous chemicals<br>Changing works to remove risk (such as moving works to ground level to eliminate working at heights)  |
| Substitution                        | Substitute a less hazardous material, process or equipment so the consequence is lower. Note that replacing a hazard often introduces a different hazard.                               | Substitute the hazard with a safer alternative<br>Reduce the weight of lifts<br>Reduce the toxicity of chosen chemicals<br>Use different plant or equipment  |
| Isolation                           | Isolate the hazard from the person at risk.   | Barriers and restricted work areas<br>Bunding<br>Noise insulation  |
| Engineering                         | Reduce the likelihood of the unwanted event through hardware design.  | Mechanical assistance<br>Electronic solutions  |
| Administration                      | Reduce exposure to hazards through procedures, instructions, training and competency.   | Training<br>Inspections<br>Review of procedures  |
| Personal Protective Equipment (PPE) | At-risk employees wear personal protective equipment to provide a last line of defence if either control prove ineffective. PPE may be used in conjunction with other control measures. | Eye protection<br>Long sleeves and trousers<br>Respirators/Breathing Apparatus<br>Helmets<br>Steel capped, leather lace-up boots<br>Ensuring PPE is correctly selected, fitted, maintained and used. |

### 8.3. Hazard Identification and Management

For the purpose of this plan, an environmental hazard is taken to be the same as an environmental aspect, as referred to in ISO 14001:2015. A hazard is an element of activities or products or services that can interact with the environment. This approach is consistent with the assessment of environmental aspects and their interaction with Project activities.

An assessment of environmental hazards for new works or conditions is conducted with reference to existing knowledge and specific information on:

- The type of activity to be undertaken on the relevant assets;
- The location of the activity and proximity to sensitive environments;
- Equipment to be used;
- Environmental and community values potentially impacted; and
- Government authority approvals.

An overall project risk assessment shall be completed, including an environmental risk assessment that identifies the key risks and likely controls. Based on the assessment process, the environmental hazards and risks that have a residual risk of moderate or higher, and any risks that require specific management or

may generate complaints are identified in the various guidelines and appropriate mitigation strategies outlined. At a more detailed level, activity specific hazards are identified through the use of SHEWMS and inspections.

Hazards are reported through Veolia's Integrated Management System and actions assigned are taken to address the hazard.

**PART B – IMPLEMENTATION**

**ELEMENT 1. LEADERSHIP, ACCOUNTABILITY AND CULTURE**

All managers, staff, employees and contractors will actively drive continuous improvement in environmental performance on the project.

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor | Deliverables   |
|---|---|---|---------------------------------|--|
| 1.1.Environmental accountabilities, roles and responsibilities for managers, staff, employees and subcontractors are clearly defined, documented and communicated | Standard: <a href="#">SHEQ Leadership and Commitment</a><br>Process: <a href="#">Demonstrate Project Leadership</a><br>Process: <a href="#">Define Project Roles Responsibilities and Tasks</a><br>Process: <a href="#">SHEQ Performance Reporting</a>  | <b>Roles and Responsibilities</b><br>Environmental responsibilities are included in all relevant position descriptions. Roles that carry specific environmental accountabilities, i.e. those that supervise or manage work with specific environmental risks, will contain more detailed environmental content.<br>The environmental responsibilities contained in this plan are communicated to each person by their immediate Manager/Supervisor upon commencing in their role.                         | Project Manager                 | Position descriptions<br>Performance reviews   |
| 1.2.Environmental leadership and commitment is demonstrated through measurable participation in environmental management  | Standard: <a href="#">SHEQ Leadership and Commitment</a><br>Process: <a href="#">Demonstrate Project Leadership</a><br>Process: <a href="#">SHEQ Performance Reporting</a><br>Process: <a href="#">Leadership Walk and Talk</a><br>Process: <a href="#">Site Communication</a><br>Process: <a href="#">Communications Process</a> | <b>Participation and Measurement</b><br>All personnel in leadership roles on the project participate in environmental management activities, including observations, incident reviews, toolbox talks and attend prestart meetings.<br>In addition, project management will regularly review environmental performance against project KPIs and raise corrective action to maintain or improve environmental performance as necessary.<br>Environmental matters will be addressed at communication forums. | Project Manager                 | Observation records<br>Incident reviews (minutes)<br>Toolbox talks<br>LEADs, Inspections |
| 1.3.Environmental expectations are clearly defined with appropriate reward  | Standard: <a href="#">SHEQ Leadership and Commitment</a><br>Process: <a href="#">Demonstrate Project Leadership</a>   | <b>Environmental (SHEQ) Policy</b><br>The SHEQ policy will be communicated in project inductions and prominently displayed on the SHEQ noticeboards.<br><b>Performance Targets</b>  | SHEQ Manager                    | SHEQ policy displayed on noticeboards and communicated in site inductions                |

| Expectations                        | Procedures   | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor | Deliverables   |
|-------------------------------------|--|--|---------------------------------|--|
| and disciplinary processes in place | Process: <a href="#">Create and Maintain a Positive Culture</a><br>Process: <a href="#">Behavioural Safety Improvement</a><br>Policy: <a href="#">Performance Management &amp; Discipline</a><br>Process: <a href="#">Conduct a Performance Review</a><br>Process: <a href="#">Manage Poor Performance</a> | Environmental performance targets for the project have been identified in Part A of this document. The associated key performance indicators (KPIs) include lead and lag indicators.<br><b>Managing Personal Performance</b><br>Performance and development reviews occur regularly and may include an assessment of performance against any individual environmental goals in addition to Project environmental KPIs. |                                 | Monthly reports<br>Ven-Safe dashboard<br>Performance reviews |

**ELEMENT 2. PLANNING**

We will formally and systematically plan for effective environmental management on the project.

| Expectations   | Procedures  | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor | Deliverables  |
|--|---|---|---------------------------------|---|
| <p>2.1. Adequate resources are provided to effectively implement the EMP</p>           | <p>Process: <a href="#">Source Project People and On Boarding</a></p> <p>Process: <a href="#">Identify and Manage Project Requirements</a></p> <p>Process: <a href="#">Establish the Organisational Structure</a></p> <p>Process: <a href="#">Define Project Roles Responsibilities and Tasks</a></p> | <p><b>Resources</b></p> <p>Sufficient resources will be provided to implement this plan including personnel, technical environmental expertise, equipment, materials, training, and plant and infrastructure.</p> <p>An organisational chart is provided in the Project and Quality Management Plan (US-050052-QS-MP-001).</p> <p><b>Environmental Monitoring</b></p> <p>The SHEQ Manager is accountable for developing environmental monitoring schedules on the project.</p> <p>All equipment, equipment maintenance (including calibration) and personnel required to implement environmental monitoring, will be identified.</p> <p>Environmental monitoring is planned in accordance with the requirements of the Project’s environmental sub-plans.</p> | <p>Project Manager</p>          | <p>Project budget</p> <p>Project forecasts</p> <p>Organisational structure in project management plan</p> <p>Training matrix</p> <p>Training schedule</p> |
| <p>2.2. IT Systems are defined and established</p>                                     | <p>Process: <a href="#">IT Risk Mitigation &amp; Opportunity Realisation</a></p> <p>Process: <a href="#">Project Start-Up</a></p> <p>Process: <a href="#">Mobilise Project</a></p>  | <p><b>Define and Set-Up IT Systems</b></p> <p>Information technology systems required to manage environmental performance will be defined and established.</p> <p>Systems to be used include:</p> <ul style="list-style-type: none"> <li>• Ven-Safe – to record all incidents and actions; and</li> <li>• JD Edwards (NGER module) – to capture energy use and emissions, and water and waste data.</li> </ul>  | <p>Project Manager</p>          | <p>Ven-Safe</p> <p>JD Edwards (JDE)</p>   |
| <p>2.3. Environmental sub-plans are prepared for significant environmental hazards</p> | <p>Standard: <a href="#">Hazard Identification and Risk Assessment and Control</a></p> <p>Process: <a href="#">Develop/Update Project Management Plans</a></p> <p>Process: <a href="#">Risk and Opportunity Assessment</a></p>  | <p><b>Identify Significant Environmental Hazards (SEH)</b></p> <p>Significant environmental hazards will be identified through the review and analysis of environmental maps, contractual documents and, community and legal compliance requirements relating to the project.</p> <p><b>Environmental Sub-Plans (Guidelines)</b></p>  | <p>Project Manager</p>          | <p>Significant environmental hazards (included in Guidelines – refer to Section 6 High-Risk Activities)</p> <p>Project risk register</p> <p>VenDocs</p>   |

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor | Deliverables   |
|---|---|--|---------------------------------|--|
|   | <p>Process: <a href="#">Identify and Manage Project Requirements</a></p> <p>Sustainability Management (US-050052-ENV-GL-001)</p> <p>Soil and Water Management (US-050052-ENV-GL-002)</p> <p>Waste Management (US-050052-ENV-MP-010)</p> <p>Hazardous Chemicals and Spill Response Management (US-050052-ENV-GL-003)</p> <p>Biodiversity Management (US-050052-ENV-GL-004)</p> <p>Indigenous and Cultural Heritage Management (US-050052-ENV-GL-005)</p> <p>Air Quality Management (US-050052-ENV-GL-008)</p> <p>Noise and Vibration Management (US-050052-ENV-GL-009)</p> | <p>Environmental sub-plans will be prepared to address the following project environmental impacts:</p> <ul style="list-style-type: none"> <li>• Sustainability Management;</li> <li>• Soil and Water Management;</li> <li>• Waste Management;</li> <li>• Hazardous Chemicals and Spill Response Management;</li> <li>• Indigenous and Cultural Heritage Management;</li> <li>• Biodiversity Management;</li> <li>• Air Quality Management; and</li> <li>• Noise and Vibration Management.</li> </ul> <p>Environmental sub-plans shall be reviewed for on-going relevance and accuracy by the SHEQ Manager and Veolia Environmental Specialist.</p> <p>The frequency of review may be triggered by any incidents, project change, contract variations and management system reviews. Reviews shall be documented, and records retained in VenDocs.</p> |                                 | <p>Environmental Guidelines include:</p> <ul style="list-style-type: none"> <li>- Energy and Greenhouse Gas Management</li> <li>-Soil and Water Management</li> <li>-Waste Management</li> <li>-Hazardous Chemicals and Spill Response</li> <li>-Flora and Fauna Management</li> <li>-Heritage Management</li> <li>-Noise &amp; Vibration Management</li> <li>-Contaminated Land</li> <li>-Weed and Pest Management</li> </ul> |
| <p>2.4. Work is planned and executed to ensure compliance</p> | <p>Process: <a href="#">Manage Client Requirements and Project Performance</a></p> <p>Process: <a href="#">Identify and Manage Project Requirements</a></p> <p>Process: <a href="#">SHEQ Legal Requirements</a></p> <p>Process: <a href="#">SHEQ Objectives and Improvement Planning</a></p>  | <p><b>Planning for Compliance</b></p> <p>The SHEQ Manager shall be consulted in the development of all works procedures and SHEWMS.</p> <p>All controls necessary to ensure environmental compliance shall be included in the SHEWMS and sub-plans.</p> <p>SHEWMS shall be reviewed by the SHEQ Manager and approved by the Project Manager (or designee) prior to the commencement of works.</p> <p><b>Implementing Controls</b></p> <p>Controls required to achieve compliance, as detailed in the site’s risk assessments and/or SHEWMS, will be implemented before relevant works commence.</p> <p>The environmental aspects and impacts register contains an explanation and link to the sub-plan. This further explains how the project will regularly demonstrate compliance with each requirement.</p>   | <p>Project Manager</p>          | <p>Start Cards</p> <p>SHEWMS</p>   |

| Expectations  | Procedures   | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor | Deliverables   |
|---|--|---|---------------------------------|--|
| <p>2.5. Inspections, observations and monitoring are performed to ensure compliance is maintained</p> | <p>Process: <a href="#">Conduct Assurance Audit</a><br/>                     Process: <a href="#">SHEQ Performance Reporting</a><br/>                     Process: <a href="#">Manage SHEQ Planned Inspections</a></p>                   | <p><b>Inspections and Observations</b></p> <p>Environmental controls will be regularly inspected to ensure their ongoing suitability and effectiveness.</p> <p>Corrective actions raised, will be tracked and closed out in Ven-Safe.</p> <p>Inspections will be undertaken using the LEAD observation process and recorded in Ven-Safe.</p> <p><b>Environmental Monitoring</b></p> <p>Environmental monitoring is carried out to confirm compliance with the conditions of environmental approvals and laws, and to provide early indications of potential adverse impacts to the environmental or community.</p> <p>Environmental monitoring results are interpreted to identify actual and potential non-compliances and events that may result in nuisance, environmental harm and unacceptable loss of amenity or community complaints. Corrective actions are taken immediately, where required and are discussed in weekly and/or monthly environmental monitoring reports. Where required, further actions will be reported into Ven-Safe.</p> <p>All equipment, equipment maintenance (including calibration) and personnel required to implement environmental monitoring, will be identified.</p> <p>All monitoring is planned and conducted according to the requirements of the as detailed in the relevant environmental sub-plans.</p> | <p>Project Manager</p>          | <p>Inspections<br/>                     Observation records<br/>                     Ven-Safe<br/>                     LEADs</p>         |
| <p>2.6. All energy and greenhouse data collected and entered into JDE</p>                             | <p>Process: <a href="#">Manage Client Requirements and Project Performance</a><br/>                     Process: <a href="#">SHEQ Performance Reporting</a><br/>                     Process: <a href="#">Project KPI Management</a></p> | <p><b>Greenhouse and Energy</b></p> <p>All sources of energy use and production, and greenhouse gases, including those relating to subcontractors, will be identified and recorded as determined by <b>Veolia</b>.</p> <p>Data for energy used and produced and greenhouse gases emitted, will be captured and entered into JDE.</p> <p>Relevant records relating to the reporting of NGER data will be retained for seven years.</p>   | <p>Project Manager</p>          | <p>NGER subcontractor register<br/>                     NGER checklist<br/>                     Completed NGER subcontractor records</p> |

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor | Deliverables                   |
|---|---|--|---------------------------------|--------------------------------|
| 2.7. Personnel on the site have access to current versions of relevant legislation, standards and codes of practice | Process: <a href="#">SHEQ Legal Requirements</a><br>Process: <a href="#">Communications Process</a><br>Process: <a href="#">Site Communication</a><br>Process: <a href="#">Deliver Site Project Induction Package</a> | <p><b>Updates to Legislation, Standards and Codes of Practice</b></p> <p>Access to all relevant legislation shall be available to personnel via Ven-Law or other online resources.</p> <p>Updates to legislation, standards and codes of practice are reviewed to determine relevance.</p> <p>Work practices, including the environmental sub-plans and environmental aspects and impacts register will be updated by the SHEQ Manager to ensure compliance.</p> | Project Manager                 | Updates distributed<br>Ven-Law |

**ELEMENT 3. LEGAL COMPLIANCE**

We will comply with all applicable safety legislation, standards and codes of practice

| Expectations  | Procedures   | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor | Deliverables  |
|---|--|--|---------------------------------|---|
| <p>3.1. All necessary environmental approvals are obtained prior to commencing relevant works and surrendered on completion</p> | <p><a href="#">Ventia Compliance Framework</a></p> <p>Process: <a href="#">SHEQ Legal Requirements</a></p> <p>Process: <a href="#">Manage Client Requirements and Project Performance</a></p> <p>Process: <a href="#">Identify and Manage Project Requirements</a></p> | <p><b>Consultation with Environmental Stakeholders</b></p> <p>Veolia shall consult with relevant government agencies, service and utility providers in the preparation of environmental plans and in preparation of the project.</p> <p><b>Identifying environmental obligations</b></p> <p>An environmental obligations register will be updated to include conditions associated with regulatory approvals, environmental licences, permits and/or land owner consents to perform certain environmental functions on the projects (e.g. trade waste discharge licence).</p> <p>The environmental obligations register shall be consistent with the Veolia SHEQ legal requirements business process.</p> <p>An environmental obligations register shall be compiled to identify all:</p> <ul style="list-style-type: none"> <li>• Contractual conditions specific to environmental management</li> <li>• Regulatory approvals required and associated conditions</li> <li>• Specific requirements of local, state and federal laws that are additional to the requirements of project approvals</li> <li>• Additional approvals, licences, permits or consents as required for performing the project works</li> </ul> <p><b>Obtaining and Surrendering Environmental Approvals</b></p> <p>Approvals required to deliver the project will be obtained prior to the commencement of any activities relating to the scope of the approval. The timing to obtain each necessary regulatory approval is included within the project program linked to relevant activities.</p> <p>Details of all approvals and licences (including applications and decision notices where appropriate) shall be maintained on the licence database function of Ven-Safe.</p> <p>All regulatory approvals shall be surrendered according to the requirements of the approval or, where not stated, as soon as practical following the completion of the activity to which the approval relates.</p> | <p>Project Manager</p>          | <p>Environmental approvals</p> <p>Approvals and licences maintained on Ven-Safe</p> <p>Updated environmental obligations register</p> |

| Expectations                                      | Procedures  | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor | Deliverables     |
|---|---|---|---------------------------------|------------------|
|   |   | An environmental aspects and impacts register will be updated to include conditions associated with newly received regulatory approvals.  |                                 |                  |
| 3.2.All non-compliances are reported as incidents | Process: <a href="#">Investigate and Finalise SHEQ Incident</a><br>Process: <a href="#">Corrective and Preventive Action</a><br>Process: <a href="#">Communications Process</a> | <p><b>Reporting Non-Compliances</b></p> <p>All non-compliances will be recorded and reported in Ven-Safe. Should a non-compliance be issued by a Regulator, in such cases, these will be recorded as an incident and investigated accordingly.</p> <p>The management of environmental incidents and non-compliances is detailed further in Element 9.</p> | Project Manager                 | Incident reports |

**ELEMENT 4. RISK MANAGEMENT**

We will use a risk management approach during all stages of the project to identify, assess, control and review environmental risks and harness opportunities

| Expectations   | Procedures  | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor                                | Deliverables   |
|--|---|---|--|--|
| 4.1. Systematic processes are defined and implemented for identifying environmental risks and opportunities at all stages of the project | <p>Standard: <a href="#">Risk &amp; Opportunity Management Framework</a></p> <p>Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a></p> <p>Process: <a href="#">Project Risk and Opportunity Assessment</a></p> <p>Process: <a href="#">Manage Project Service Delivery Risk</a></p> | <p><b>Identifying Environmental Risks and Opportunities</b></p> <p>Environmental risks associated with activities, products and services of the project will be identified and recorded in the Project’s Risk Register.</p> <p>Where relevant, environmental opportunities are considered during the development of the SHEWMS and at the task risk-assessment level.</p> <p>Environmental risks and opportunities are considered as follows:</p> <ul style="list-style-type: none"> <li>• The principal risk assessment conducted at bid stage for major tangible risks</li> <li>• Overarching project risk assessment</li> <li>• SHEWMS</li> <li>• Task-based risk assessments</li> </ul> | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Project risk register</p> <p>SHEWMS</p> <p>Toolbox records</p> <p>Start Cards</p> |
| 4.2. Identified risks and opportunities are analysed and evaluated according to agreed criteria and recorded in a risk register          | <p>Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a></p> <p>Process: <a href="#">SHEQ Activity and Task Based Risk Assessment</a></p> <p>Process: <a href="#">Project Risk and Opportunity Assessment</a></p> <p>Process: <a href="#">Manage Project Service Delivery Risk</a></p> | <p><b>Analysing Environmental Risks and Opportunities</b></p> <p>Each environmental risk and opportunity will be evaluated and assigned a rating which is determined using the consequence and likelihood criteria ratings.</p> <p>Opportunities will be assessed to determine whether or not they can be implemented on the project and be based on a cost-benefit business case for the opportunity.</p> <p>Advice shall be sought from the SHEQ Manager as necessary by the project team to ensure SHEWMS risk assessments are as informed and accurate as possible.</p>   | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Project risk register</p> <p>SHEWMS</p> <p>Toolbox records</p> <p>Start Cards</p> |
| 4.3. Environmental controls appropriate to the level of risk are identified, documented and implemented                                  | <p>Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a></p> <p>Process: <a href="#">Project Risk and Opportunity Assessment</a></p> <p>Process: <a href="#">Manage Project Service Delivery Risk</a></p>  | <p><b>Identifying Adequate Controls</b></p> <p>A work activity / task is not to proceed if the formal risk assessment (e.g. SHEWMS) has identified the following:</p> <ul style="list-style-type: none"> <li>• The risk is classified from 23-25 (EXTREME) on the Risk Matrix and the Executive Manager has not granted approval</li> </ul>   | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Project risk register</p> <p>SHEWMS</p> <p>Toolbox records</p> <p>Start Cards</p> |

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor                 | Deliverables  |
|---|---|--|---|---|
|   | Process: <a href="#">Review/Update Key Risk Documents</a>   | <ul style="list-style-type: none"> <li>The risk is classified from 17-22 (VERY HIGH) and the Project Manager or delegate has not granted approval</li> <li>The risk is classified from 12-16 (HIGH) and the Supervisor has not granted approval</li> <li>The risk is classified from 8-11 (MODERATE) and the Supervisor has not granted approval and where;</li> <li>Consensus is not reached in the consultation phase of SHEWMS development/review in relation to risk values or controls required/options</li> </ul> <p><b>Implementing Controls</b><br/>Controls shall be implemented by the accountable person by the due date. No activity is commenced until all relevant controls are implemented.</p> |   |   |
| 4.4. Feasible opportunities are implemented   | Process: <a href="#">Project Risk and Opportunity Assessment</a><br>Process: <a href="#">Manage Project Service Delivery Risk</a>   | <p><b>Implementing Opportunities</b><br/>Opportunities identified and, for which a business case has been developed, are to be submitted to the Project Manager for approval. Once approved, accountability for implementation of the opportunity is assigned and the opportunity is implemented.</p>  | Project Manager<br>Engineers<br>Site Supervisor | Monthly reports<br>Ven-Safe   |
| 4.5. Identified environmental risks and controls are communicated to all relevant personnel | Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a><br>Process: <a href="#">SHEQ Risk Assessment</a><br>Process: <a href="#">Site Communication</a><br>Process: <a href="#">Communications Process</a> | <p><b>Communications</b><br/>The environmental risks, controls and accountabilities shall be communicated to all relevant personnel. This is achieved through inductions and other environmental risk training and also the preparation of SHEWMS and Start Cards.</p> <p><b>SHEQ Communications</b><br/>Environmental risks, controls and accountabilities are also communicated through the delivery of H&amp;S communications, including prestart meetings, toolbox talks and face-to-face meetings.</p>  | Project Manager<br>Engineers<br>Site Supervisor | Toolbox records<br>Face-to-face meetings<br>HSE communications and meetings<br>Training records |
| 4.6. Regular inspections and monitoring are conducted to check effectiveness of controls    | Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a><br>Process: <a href="#">SHEQ Risk Assessment</a><br>Process: <a href="#">SHEQ Activity and Task Based Risk Assessment</a>                          | <p><b>Inspections, Observations and Monitoring</b><br/>Environmental inspections will be undertaken weekly to ensure their ongoing suitability and effectiveness. The environmental management system will be audited 6-monthly as per the HSE Activity Schedule.<br/>Corrective actions raised, will be tracked and closed out in Ven-Safe.</p>   | Project Manager<br>Engineers<br>Site Supervisor | Inspections<br>Observation records<br>Ven-Safe<br>LEADs   |

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor                 | Deliverables  |
|---|---|---|---|---|
|   | Process: <a href="#">Behavioural Safety Improvement</a><br>Process: <a href="#">Manage SHEQ Planned Inspections</a>   | Inspections will be undertaken using the LEAD observation process and recorded in Ven-Safe.   |   | Audits  |
| 4.7.Environmental risks and controls are regularly reviewed | Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a><br>Process: <a href="#">SHEQ Risk Assessment</a><br>Process: <a href="#">SHEQ Activity and Task Based Risk Assessment</a><br>Process: <a href="#">Manage Project Service Delivery Risk</a> | <p><b>Risk review</b></p> <p>The relevance and adequacy of environmental risks and controls identified in this plan, including the project risk assessment, works procedures or SHEWMS, will be reviewed and updated as per project requirements.</p> | Project Manager<br>Engineers<br>Site Supervisor | Updated risk registers<br>Inspections<br>Observation records<br>LEADs<br>SHEWMS |

**ELEMENT 5. CHANGE MANAGEMENT**

We will identify and manage environmental consequences arising from permanent and temporary changes to the project’s planned operations

| Expectations   | Procedures   | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor                                | Deliverables  |
|--|--|--|--|---|
| <p>5.1.Changes to the planned operations that have potential environmental consequences are identified</p>     | <p>Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a></p> <p>Process: <a href="#">Manage Change for Projects</a></p> <p>Process: <a href="#">Modifications and Change Management</a></p>   | <p><b>Identifying Change</b></p> <p>Personnel are required to promptly report any ‘medium’ or ‘major’ changes that could affect the environment and community in accordance with the Ventia Process: Modifications and Change Management.</p> <p>Depending on the nature of the change - minor or major, a formal change request may be required. Changes that affect a work activity at the worksite, such as a one-off change that will not affect other projects or work activities, are considered 'minor' change.</p> <p>Changes that affect the Company-wide processes or systems are considered 'major' change.</p> <p>Minor changes include amending documented Project processes and procedures such as SHEWMS, Start Cards or risk tools required to manage a particular hazard on the day. Minor changes are communicated at toolbox talks and face to face interactions.</p> | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Change requests</p> <p>Toolbox minutes</p> <p>Updated SHEWMS</p> <p>Start Card</p> |
| <p>5.2.Risks associated with identified changes are assessed and controlled before changes are implemented</p> | <p>Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a></p> <p>Process: <a href="#">Modifications and Change Management</a></p> <p>Process: <a href="#">SHEQ Risk Assessment</a></p> <p>Process: <a href="#">Manage SHEQ Planned Inspections</a></p> | <p><b>Risks Associated with Change</b></p> <p>An assessment shall be undertaken to determine the risk associated with the change. The assessment will be based on the determination of potential consequence using the Risk Matrix.</p> <p>The effectiveness of the change process will be monitored during and after implementation, ensuring any unintended hazard is promptly controlled. If required, the Project Risk Register will also be updated to reflect new hazards and controls.</p> <p>A risk-based approach using HIRAC principals will be used for any unplanned change/deviation from the approved SHEWMS and all changes must be documented in the Start Card.</p>   | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Veolia Risk Matrix.</p> <p>Revised Start Cards</p> <p>SHEWMS</p>                   |
| <p>5.3.All changes with environmental</p>  | <p>Standard: <a href="#">SHEQ Hazard Identification and Risk Assessment and Control</a></p>  | <p><b>Approvals of Change</b></p>  | <p>Project Manager</p> <p>Engineers</p>                        | <p>Revised Start Cards</p> <p>SHEWMS</p>  |

| Expectations  | Procedures   | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor  | Deliverables  |
|---|--|---|--|---|
| <p>consequences are authorised before they are implemented</p>                        | <p>Process: <a href="#">Manage Change for Projects</a></p>   | <p>Proposed changes must be approved before they are implemented. The level of approval required depends on the type and potential consequence of the change.</p> <p>Before the change is approved, the authorised approver must be satisfied that:</p> <ul style="list-style-type: none"> <li>• The appropriate people (including stakeholders) have been consulted</li> <li>• All immediate and downstream/consequential implications have been fully considered</li> <li>• The change proposed is effective and practical</li> <li>• The implementation plan is practical and achievable</li> </ul> <p>If a work activity involves a change to an existing procedure/process, SHEWMS or Start Cards, the relevant Subject Matter Expert will approve the change. Changes to process in other functional areas will be managed by the Subject Matter Expert for that functional group.</p> <p>Major changes will be approved by the Project Manager (or delegated authority) acting as the authorised approver.</p> | <p>Site Supervisor</p>   |   |
| <p>5.4.Controls associated with change are communicated to all affected personnel</p> | <p>Process: <a href="#">Manage Change for Projects</a><br/>                     Process: <a href="#">Site Communication</a><br/>                     Process: <a href="#">Communications Process</a></p> | <p><b>Communication of Change</b></p> <p>All changes must be clearly communicated to affected personnel. Communication methods will be via toolbox talks, face to face meetings, pre-starts and/ or site team meetings.</p>   | <p>Project Manager<br/>                     Engineers<br/>                     Site Supervisor</p> | <p>Toolbox talk material<br/>                     Per-start meetings<br/>                     Meeting minutes</p> |

**ELEMENT 6. COMMUNICATION, CONSULTATION AND WHS COMMITTEES**

We will effectively and openly communicate and consult with external and internal stakeholders to create an environment of trust, openness and involvement

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor                 | Deliverables   |
|---|---|--|---|--|
| 6.1. External environmental stakeholders are identified                 | Standard: <a href="#">Environment and Community</a><br>Process: <a href="#">Manage Client Requirements and Project Performance</a><br>Process: <a href="#">Identify and Manage Project Requirements</a><br>Process: <a href="#">Risk and Opportunity Assessment</a> | <b>Identifying External Stakeholders</b><br>All engagement with community and other stakeholders shall be in accordance with the community engagement plan.  | Project Manager<br>Engineers<br>Site Supervisor |  |
| 6.2. Relationships with external stakeholders are effectively managed   | Standard: <a href="#">Environment and Community</a><br>Process: <a href="#">Manage Client Requirements and Project Performance</a><br>Process: <a href="#">Identify and Manage Project Requirements</a>   | <b>Managing Relationships</b><br>Activities performed to effectively manage relationships with external stakeholders include: <ul style="list-style-type: none"> <li>Identifying environmental risks that relate to stakeholder interests by considering the impacts to stakeholders</li> <li>Determining suitable controls and activities to mitigate risks</li> <li>Performing inspections, audits, stakeholder engagement and monitoring activities to assess the effectiveness of controls; and</li> <li>Where required, actively engaging stakeholders through open communication and involvement.</li> </ul> | Project Manager<br>Engineers<br>Site Supervisor | Project risk register<br>SHEWMS<br>Environmental guidelines<br>Audit reports<br>Monitoring results<br>Communication records<br>Forums for stakeholder engagement |
| 6.3. Internal consultative forums are established with regular meetings | Process: <a href="#">Site Communication</a><br>Process: <a href="#">Communications Process</a>  | <b>Consultative Forums</b><br>A schedule of communication forums will be developed and include:  | Project Manager<br>Engineers<br>Site Supervisor | BU Meetings<br>Toolbox talks<br>Attendance records   |

| Expectations  | Procedures   | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor                                | Deliverables  |
|---|--|---|--|---|
| <p>scheduled, conducted, documented and communicated</p>                                      | <p>Process: <a href="#">Corrective and Preventative Action</a></p>   | <ul style="list-style-type: none"> <li>Business Unit SHEQ meetings (performance review, incident trends, status of corrective actions or investigation, compliance to KPIs, etc.) at least monthly</li> <li>Toolbox talks – Monthly</li> </ul> <p>Consultation with the workforce and subcontractors shall also be included during:</p> <ul style="list-style-type: none"> <li>Inductions</li> <li>Review / training of H&amp;S procedures, SHEWMS development, risk assessments, etc.</li> <li>Client and contractor meetings</li> <li>Subcontractor workshops</li> </ul> <p>Actions arising from consultation forums will be tracked using the SHEQ Ven-Safe corrective action database.</p> <p>Minutes of meetings shall be recorded.</p>  |  | <p>Notice boards</p> <p>Inductions</p>  |
| <p>6.4.Environmental complaints and enquiries are recorded and responded to appropriately</p> | <p>Standard: <a href="#">Environment and Community</a></p> <p><a href="#">Ventia Incident Classification Guideline</a></p> <p>Process: <a href="#">Manage Client Requirements and Project Performance</a></p> <p>Process: <a href="#">Investigate and Finalise SHEQ Incident</a></p> <p>Process: <a href="#">Corrective and Preventative Action</a></p> <p>Process: <a href="#">Communications Process</a></p> | <p><b>Responding to Complaints and Enquiries</b></p> <p>The Site Operator will be notified of all complaints. Environmental related complaints will be classified according to the Ventia Incident Classification Guideline and recorded in Ven-Safe.</p> <p>Corrective and preventative actions, assigned to an appropriate person, shall be given a date for completion and captured within the Ven-Safe system.</p> <p>The Site Operator will be notified of the intended project response once approved by the Project Manager.</p> <p><b>Changes to Environmental Monitoring</b></p> <p>Environmental monitoring may be required in response to valid complaints and consultations with stakeholders. Data will be analysed to identify actual and potential impacts to the community, and corrective actions implemented.</p> <p><b>Client and Internal Notifications</b></p> <p>The Project Manager shall be notified immediately of complaints that have or are likely to generate media interest. The Project Manager shall provide support and information to the Site Operator, as required, to assist in the effective management of the community and stakeholder engagement process associated with the Project activities.</p> | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Incident records</p> <p>Complaints register</p> <p>Communication records</p> |

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br><i>Key Contributor</i>          | Deliverables   |
|---|---|--|---|--|
| 6.5.The effectiveness of internal and external stakeholder engagement is evaluated and improved | Standard: <a href="#">Environment and Community</a><br>Process: <a href="#">Manage Client Requirements and Project Performance</a><br>Process: <a href="#">Conduct Assurance Audit</a><br>Process: <a href="#">SHEQ Performance Reporting</a> | <p><b>Evaluation of Internal and External Communications</b></p> <p>The effectiveness of internal and external communication and consultation activities are reviewed annually (or at least once within the project period) as per the Ventia Management System Review requirements.</p> <p>The SHEQ Manager shall participate in both of these reviews, which are led by the Project Manager.</p> <p>The SHEQ Manager shall also regularly attend and review the effectiveness of forums and recommend changes to the scheduling or style of forum.</p> | Project Manager<br>Engineers<br>Site Supervisor | Incident records<br>Complaints register<br>Communication records |

**ELEMENT 7. TRAINING AND COMPETENCY**

We will ensure that all personnel working on the project are competent to perform their duties safely

| Expectations  | Procedures   | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor   | Deliverables   |
|---|--|---|---|--|
| <p>7.1. All personnel have completed an induction containing relevant environmental information before they are authorised to work on the project</p> | <p>Process: <a href="#">Deliver Site Project Induction Package</a></p> <p>Process: <a href="#">Safety, Health, Environment and Quality Training</a></p> <p>Process: <a href="#">Identify Training Requirements</a></p> | <p><b>Inductions</b></p> <p>All personnel, including employees, subcontractors and visitors, will receive appropriate inductions before they commence work.</p> <p>The induction addresses general and project-specific environmental issues, including:</p> <ul style="list-style-type: none"> <li>• Ventia environmental (SHEQ) policy</li> <li>• How environmental controls will be implemented on site</li> <li>• High risk environmental activities on the project and their controls</li> <li>• What to do in the event of an environmental incident</li> </ul> <p>A competency assessment will be conducted upon completion of the induction.</p> <p>Induction materials shall be reviewed and amended to reflect changes to project environmental risks, the status of community relations and the occurrence of incidents.</p> | <p>Project Manager<br/>SHEQ Manager<br/>Engineers<br/>Site Supervisor</p> | <p>Inductions &amp; assessment records</p> <p>Training attendance records</p>  |
| <p>7.2. A training plan is developed and documented</p>   | <p>Process: <a href="#">Safety, Health, Environment and Quality Training</a></p> <p>Process: <a href="#">Manage Facility Training for Project</a></p> <p>Process: <a href="#">Identify Training Requirements</a></p>   | <p><b>Identifying Training Needs</b></p> <p>Environmental training needs required on this project shall be identified and documented within the project’s training matrix. The SHEQ Manager will be consulted in developing the training matrix.</p> <p>The Ventia performance review and development processes shall provide an opportunity to identify and plan the delivery of training needs that are necessary in the development of the individual.</p> <p>Subcontractor training and competency responsibilities will be included in subcontractor agreements.</p> <p><b>Scheduling Training Needs</b></p> <p>A project training schedule will be developed to plan the delivery of training needs that have been identified in the Project’s training matrix. Refresher training will also be provided where applicable.</p>    | <p>Project Manager<br/>Engineers<br/>Site Supervisor</p>                  | <p>Training matrix</p> <p>Training needs analysis</p> <p>Subcontractor meeting minutes</p> <p>Completed training records and assessments</p> |

| Expectations   | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor  | Deliverables   |
|--|---|--|--|--|
| <p>7.3. Personnel are trained and assessed according to the training plan</p>    | <p>Process: <a href="#">Safety, Health, Environment and Quality Training</a></p> <p>Process: <a href="#">Manage Facility Training for Project</a></p> <p>Process: <a href="#">Conduct Training or Assessment</a></p> <p>Process: <a href="#">Conduct a Performance Review</a></p> | <p><b>Provide Training Resources</b></p> <p>All resources to deliver the training schedule, including personnel, equipment, funding and materials, will be allowed for in the project budget.</p> <p><b>Delivery of Training</b></p> <p>All training identified in the training matrix will be delivered according to the training schedule.</p> <p>Training and development needs, identified through the performance review and development process, shall be achieved as per time frames nominated in individual plans.</p> <p><b>Training Evaluation and Review</b></p> <p>Training assessments and evaluation forms shall be used to assess the effectiveness and improve the quality of training.</p> <p>The training matrix will be updated monthly to identify gaps in training delivery programs for individuals.</p> | <p>Project Manager</p> <p>SHEQ Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Training matrix</p> <p>Training needs analysis</p> <p>Subcontractor meeting minutes</p> <p>Completed training records and assessments</p> |
| <p>7.4. Training records are maintained and accessible to relevant personnel</p> | <p>Process: <a href="#">Safety, Health, Environment and Quality Training</a></p> <p>Process: <a href="#">Maintain Training Records</a></p>  | <p><b>Training Records</b></p> <p>Records of all training activities, including inductions, will be maintained in the Advance Learning Management System (LMS).</p> <p>Records will include the name and role of the attendee, the name of the course and, where applicable, reference to the document-controlled version of the material presented, and a copy of the assessment completed.</p>   | <p>SHEQ Manager</p> <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Completed training records</p> <p>Advance (LMS)</p>   |

**ELEMENT 8. SUBCONTRACTOR AND SUPPLIER RELATIONSHIPS**

We will build effective relationships with our subcontractors and suppliers to ensure they positively contribute to the safety of our project

| Expectations   | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor                                | Deliverables  |
|--|---|--|--|---|
| <p>8.1. Selection processes ensure that subcontractors meet Ventia’s minimum environmental requirements</p>                | <p>Process: <a href="#">Prepare &amp; Issue Tender for Project Procurement</a></p> <p>Process: <a href="#">Evaluate Tender Responses for Project Procurement</a></p> <p>Process: <a href="#">Contractor SHEQ Management</a></p> <p>Process: <a href="#">Mobilise Contractor</a></p> | <p><b>Subcontractor Selection and Engagement</b></p> <p>Subcontractor environmental requirements, including communication, training, reporting and accountabilities, will be included in procurement packages.</p> <p>Tender applicants will be provided with relevant environmental risks as recorded in the project’s risk register.</p> <p>Subcontractors will be made aware of Ventia’s environmental requirements throughout the tender process.</p>  | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Pre-award evaluations</p> <p>Subcontractor agreements</p> <p>Project risk register</p> |
| <p>8.2. Planning requirements of all subcontractor work scopes are completed and communicated prior to commencing work</p> | <p>Process: <a href="#">Contractor SHEQ Management</a></p> <p>Process: <a href="#">Identify and Manage Project Requirements</a></p> <p>Process: <a href="#">Site Communication</a></p> <p>Process: <a href="#">Communications Process</a></p>                                       | <p><b>Identify, Complete and Communicate Planning Requirements</b></p> <p>The scope of work to be performed by each subcontractor shall be reviewed to determine whether it includes works for which environmental risk assessments have been performed. Subcontractors shall be informed of all relevant risks and existing project documents, systems and procedures to be followed prior to commencing works.</p> <p><b>Compliance Requirements</b></p> <p>For high-risk environmental activities, the Project Manager will review the subcontractor’s scope of works and SHEWMS and ensure all controls are appropriate.</p> <p>The subcontractor will be informed of all relevant environmental risks and the controls, procedures and documents to be followed and implemented, in order to achieve compliance prior to commencing work.</p> | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>SHEWMS</p> <p>Start Cards</p>  |
| <p>8.3. Subcontractor documentation is submitted and reviewed to meet project requirements</p>                             | <p>Process: <a href="#">Prepare &amp; Issue Tender for Project Procurement</a></p> <p>Process: <a href="#">Evaluate Tender Responses for Project Procurement</a></p> <p>Process: <a href="#">Contractor SHEQ Management</a></p> <p>Process: <a href="#">Mobilise Contractor</a></p> | <p><b>Documentation Preparation and Review</b></p> <p>The subcontractor will provide Ventia with all required environmental documentation prior to commencing work on the project as described in the executed agreement. This documentation shall be assessed to ensure all nominated controls are appropriate and in accordance with Ventia’s environmental requirements.</p>  | <p>Project Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Subcontractor environmental documentation</p>  |

| Expectations   | Procedures  | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor  | Deliverables   |
|--|---|---|--|--|
| <p>8.4. Subcontractors actively participate in environmental management on the project</p>                                     | <p>Process: <a href="#">Contractor SHEQ Management</a><br/>                     Process: <a href="#">Manage SHEQ Planned Inspections</a><br/>                     Process: <a href="#">Investigate and Finalise SHEQ Incident</a><br/>                     Process: <a href="#">Site Communication</a><br/>                     Process: <a href="#">Communications Process</a></p> | <p><b>Subcontractor Environmental Participation</b><br/>                     Subcontractors will participate in SHEQ communication forums and monitoring activities on the project.</p> <p><b>Subcontractor Training</b><br/>                     Subcontractors will undergo all necessary environmental training as required by the project.</p>  | <p>Project Manager<br/>                     Engineers<br/>                     Site Supervisor</p> | <p>Attendance records<br/>                     Advance LMS<br/>                     Subcontractor training records</p>   |
| <p>8.5. Subcontractors are reviewed to assess their performance and compliance with our minimum environmental requirements</p> | <p>Process: <a href="#">Contractor SHEQ Management</a><br/>                     Process: <a href="#">Manage Audit Program and Resources</a><br/>                     Process: <a href="#">Conduct Assurance Audit</a></p>   | <p><b>Subcontractor Audits and Reviews</b><br/>                     If subcontractors are using or are permitted to use their own environmental management system, the subcontractor must demonstrate their EMS is certified to ISO 14001:2015 and implemented (preferably demonstrated by an independent audit). In such instances, the SHEQ Manager will audit their EMS within two months of start-up for subcontractors carrying out high-risk activities and annually (or at least once within the project period) thereafter.<br/>                     Subcontractors will be regularly inspected and observed for environmental performance.</p> | <p>Project Manager<br/>                     Engineers<br/>                     Site Supervisor</p> | <p>Inspections<br/>                     Observation records<br/>                     Ven-Safe<br/>                     LEADs<br/>                     Audits</p> |

**ELEMENT 9. INCIDENT MANAGEMENT**

We will effectively respond to, report, and investigate all incidents. We will take appropriate corrective and preventative actions and share associated lessons

| Expectations   | Procedures   | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor  | Deliverables  |
|--|--|---|--|---|
| <p>9.1.All incidents are followed by appropriate response and notification</p>       | <p>Process: <a href="#">Identify SHEQ Incident and Apply Immediate Response</a></p> <p>Process: <a href="#">Investigate and Finalise SHEQ Incident</a></p> <p>Process: <a href="#">Claims and Injury Management Workplace Planning</a></p> | <p><b>Incident Response</b></p> <p>The immediate response to all incidents is to make the area safe and undertake measures to prevent further environmental harm. An assessment will be made in consultation with the SHEQ advisor to ensure that responses do not result in further harm.</p> <p><b>Initial Incident Notification</b></p> <p>The Project Manager, and SHEQ Manager are to be notified immediately of the following incidents:</p> <ul style="list-style-type: none"> <li>• All Class 1 and Class 2 environmental incidents, and</li> <li>• High potential incidents (HPIs)</li> </ul> <p>The SHEQ Manager is also to be notified of any actual Class 3 environmental incidents, procedural or legal breach.</p> <p>For Class 1 incidents and HPIs, the Project Manager shall immediately notify the Business Unit General Manager, the Business Unit SHEQ Manager.</p> <p>Environmental incidents will be reported to regulators in accordance with the requirements of local, state and federal government regulations.</p> | <p>Project Manager</p> <p>SHEQ Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Records of incident notifications</p> <p>Ven-Safe</p> <p>Incident records</p> <p>SHEQ Alerts</p> <p>Veolia Incident Classification</p> |
| <p>9.2.All incidents are entered into and closed out in the SHEQ Ven-Safe system</p> | <p>Process: <a href="#">Investigate and Finalise SHEQ Incident</a></p> <p>Process: <a href="#">Corrective and Preventative Action</a></p> <p>Process: <a href="#">Communications Process</a></p>   | <p><b>Incident Classification and Reporting</b></p> <p>Environmental incidents will be classified using the Ventia Incident Classification Guideline.</p> <p>Unauthorised access to the site or entry into ‘no go zones’ will be classified using the Ventia Incident Classification Guideline.</p> <p>All environmental incidents will be reported using Ven-Safe.</p> <p>Root causes will be identified and recorded in Ven-Safe for all Class 1 and 2 incidents.</p>   | <p>Project Manager</p> <p>SHEQ Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Records of incident notifications</p> <p>Ven-Safe</p> <p>Incident records</p> <p>SHEQ Alerts</p> <p>Ventia Incident Classification</p> |

| Expectations  | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor  | Deliverables   |
|---|---|--|--|--|
|   |   | Ventia shall prepare a written report on the incident within 24 hours of such occurrence. All statutory notices received from regulators, including penalty notices and fines, will be entered into Ven-Safe.  |  |  |
| 9.3. Incident investigations are conducted appropriate to the type of incident                                | <a href="#">Ventia Incident Classification Guideline</a><br>Process: <a href="#">Identify SHEQ Incident and Apply Immediate Response</a><br>Process: <a href="#">Corrective and Preventative Action</a><br>Process: <a href="#">SHEQ Reporting &amp; Performance Monitoring</a> | <p><b>Project Incident Investigations</b></p> <p>All incidents will be investigated according to the requirements of the Ventia Incident Classification Guideline. Corrective actions, including those required to help prevent future incident occurrences, shall be recorded in Ven-Safe.</p> <p><b>Statutory Authority Investigation</b></p> <p>Before any staff member is questioned by officers of a statutory authority investigations they shall consult with the Project Manager to determine whether legal counsel is needed.</p>   | Project Manager<br>SHEQ Manager<br>Engineers<br><b>Site Supervisor</b> | Incident investigation reports   |
| 9.4. All personnel conducting incident investigations are trained to competently perform the task             | Process: <a href="#">Investigate and Finalise SHEQ Incident</a><br>Process: <a href="#">Identify Training Requirements</a>  | <p><b>Incident investigation teams are competent and trained</b></p> <p>Participants in incident investigation and management will be trained and competent to undertake investigations.</p> <p>Supervisors will be involved in the investigation process to ensure appropriate understanding and learning opportunities.</p> <p>The following is considered when selecting an investigation team:</p> <ul style="list-style-type: none"> <li>• Statutory requirements;</li> <li>• Technical specialists with an understanding of the work processes;</li> <li>• Mix of skills and experience;</li> <li>• Potential conflict of interest for any proposed member.</li> </ul> | Project Manager<br>SHEQ Manager<br>Engineers<br>Site Supervisor        | Records of incident notifications<br>Ven-Safe<br>Incident records<br>SHEQ Alerts<br>Ventia Incident Classification |
| 9.5. Corrective and preventative actions are taken after incidents and lessons are shared with other projects | Process: <a href="#">Investigate and Finalise SHEQ Incident</a><br>Process: <a href="#">Communications Process</a><br>Process: <a href="#">Corrective and Preventative Action</a>   | <p><b>Corrective and Preventative Actions</b></p> <p>Corrective and preventative actions, assigned to an appropriate person, given dated for completion and captured within the Ven-Safe system.</p> <p>Corrective actions will be monitored weekly for compliance and effectiveness.</p> <p><b>SHEQ Alerts</b></p> <p>SHEQ Alerts will be published and distributed in accordance with the Veolia Processes. As a minimum SHEQ Alerts must be developed for all HPI's, unless there are limited learnings to be communicated from the incident.</p>   | Project Manager<br>SHEQ Manager<br>Engineers<br>Site Supervisor        | Records of incident notifications<br>Ven-Safe<br>Incident records<br>SHEQ Alerts<br>Ventia Incident Classification |

**ELEMENT 10. EMERGENCY PLANNING AND RESPONSE**

We will actively prepare for and respond to emergencies

| Expectations   | Procedures  | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor   | Deliverables  |
|--|---|--|---|---|
| 10.1. Potential emergencies are identified using a formal risk assessment process                      | <p>Process: <a href="#">Emergency Management Plans</a></p> <p><a href="#">Ventia Guideline: Emergency Planning</a></p> <p>Emergency Response Management Plan (US-050052-HS-MP-002)</p>  | <p><b>Identifying potential emergencies</b></p> <p>Potential environmental emergencies to be considered, depending on the nature of the work, hazards and location of the workplace, include:</p> <p>(a) Human<br/>(b) Natural<br/>(c) Technological<br/>(d) High Risk Activities.</p>   | <p>Project Manager<br/>SHEQ Manager<br/>Engineers<br/>Site Supervisor</p> | <p>Project risk register</p>                            |
| 10.2. Emergency response plans and procedures are developed and regularly reviewed                     | <p>Process: <a href="#">Emergency Management Plans</a></p> <p><a href="#">Ventia Guideline: Emergency Planning</a></p> <p><a href="#">Ventia Crisis Management Plan</a></p> <p>Emergency Response Management Plan (US-050052-HS-MP-002)</p> | <p><b>Emergency Response Plan</b></p> <p>An Emergency Response Management Plan (US-050052-HS-MP-002) that addresses all identified potential environmental emergencies with specific emergency procedures for each different potential emergency will be developed.</p> <p>The emergency response plan will be updated at least annually or when there are significant changes to project activities or in response to revised and new risk assessments.</p> <p>The emergency response plan shall be prepared in accordance with relevant EPA, Australian and ISO standards.</p> | <p>Project Manager<br/>SHEQ Manager<br/>Engineers<br/>Site Supervisor</p> | <p>Emergency response management plan and processes</p> |
| 10.3. Adequate resources are provided to effectively implement emergency response plans and procedures | <p>Process: <a href="#">Emergency Management Plans</a></p> <p><a href="#">Ventia Guideline: Emergency Planning</a></p> <p>Process: <a href="#">First Aid</a></p> <p>Emergency Response Management Plan (US-050052-HS-MP-002)</p>            | <p><b>Emergency Resources</b></p> <p>Sufficient emergency response resources (i.e. personnel and equipment) will be provided, based on the project risk assessment of possible and likely emergency situations.</p> <p>Resources include:</p> <ul style="list-style-type: none"> <li>Emergency coordinator and wardens;</li> <li>Spill response kits – appropriate for the type and volume of hazardous materials stored or in use and shall be available and accessible to workers.</li> </ul>  | <p>Project Manager<br/>SHEQ Manager<br/>Engineers<br/>Site Supervisor</p> | <p>Project risk register<br/>Organisational chart</p>   |

| Expectations   | Procedures   | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor  | Deliverables   |
|--|--|---|--|--|
|  |  | <p>They shall be located at hazardous substance storage locations, site compounds and in proximity to specific construction activities;</p> <ul style="list-style-type: none"> <li>• Fire-fighting equipment; and</li> <li>• Barricading.</li> </ul>  |  |  |
| <p>10.4. Environmental emergency response drills are conducted</p>                                 | <p>Process: <a href="#">Emergency Management Plans</a><br/> <a href="#">Ventia Guideline: Emergency Planning</a><br/> <a href="#">Ventia Crisis Management Plan</a><br/>                     Emergency Response Management Plan (US-050052-HS-MP-002)</p>  | <p><b>Environmental Emergency Response Drills</b><br/>                     Environmental emergency response drills will be conducted at least every six months.<br/>                     Drills will be recorded, and corrective actions identified from drills will be recorded in the SHEQ Ven-Safe system.</p>   | <p>Project Manager<br/>                     SHEQ Manager<br/>                     Engineers<br/>                     Site Supervisor</p> | <p>Emergency response drill records<br/>                     Corrective action records in Ven-Safe</p>   |
| <p>10.5. Employees, contractors and visitors are given appropriate emergency response training</p> | <p>Process: <a href="#">Emergency Management Plans</a><br/> <a href="#">Ventia Guideline: Emergency Planning</a><br/>                     Process: <a href="#">Manage Facility Training for Project</a><br/>                     Process: <a href="#">Identify Training Requirements</a><br/>                     Emergency Response Management Plan (US-050052-HS-MP-002)</p> | <p><b>Emergency Training</b><br/>                     Emergency responders will be trained in the Project’s Emergency Response Management Plan and will be scheduled in the TNA/Skills Matrix.<br/>                     Training in the use of spill kits shall be given to personnel involved in the storage, distribution or use of hazardous materials. Standard Operating Procedures and relevant SHEWMS shall capture the use of hazardous materials and refuelling procedures.<br/>                     Specific training requirements will also be identified and captured within the project’s training matrix. Visitors shall be informed of requirements during the visitor’s induction.<br/> <b>General Workforce Training and Awareness</b><br/>                     All personnel and subcontractors will receive training to inform them of their roles and responsibilities in the event of an emergency. This training and awareness will be provided during the project induction and at toolbox meetings.</p> | <p>Project Manager<br/>                     SHEQ Manager<br/>                     Engineers<br/>                     Site Supervisor</p> | <p>Training matrix<br/>                     Training needs analysis<br/>                     Completed training records and assessments<br/>                     Advance (LMS)<br/>                     Project inductions</p> |

**ELEMENT 11. DOCUMENT AND RECORD MANAGEMENT**

We will maintain accurate documents and records relevant to our environmental management system

| Expectations   | Procedures  | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor  | Deliverables  |
|--|---|---|--|---|
| <p>11.1. Current versions of all relevant documents and records are available and controlled</p> | <p>Process: <a href="#">SHEQ Records Management</a></p> <p>Process: <a href="#">Record Keeping Requirements &amp; Review</a></p> <p>Process: <a href="#">Documented Information Control</a></p> <p>Process: <a href="#">System Documents Control</a></p> <p>Process: <a href="#">Manage Business Process Change</a></p> | <p><b>Document and Record Management</b></p> <p>All documents and records referred to within and required to implement this plan will be controlled and maintained according to the Ventia Process – Document and Record Management. A full list of Ventia documents and records is provided within this procedure and examples are provided below.</p> <p>Document types:</p> <p>The types of documents to be controlled include:</p> <ul style="list-style-type: none"> <li>• Procedures</li> <li>• Guidelines</li> <li>• Flow charts</li> <li>• Registers</li> <li>• Forms</li> <li>• Management Plans</li> <li>• Checklists</li> </ul> <p>Copies of the environmental records, including, audit reports, forms and templates required by Codes, Standards, environmental records, induction and training records (as required), environmental management reviews, inspection and testing records, calibration certificates and registers, subcontractor audits or other records shall be available as requested.</p> <p><b>Document Control Authorities</b></p> <p>This plan and subsequent revisions, must be authorised by the SHEQ Manager and approved by the Project Manager.</p> <p>All other new and revised environmental documents and records, including environmental sub-plans must be approved by the BU SHEQ Manager.</p> | <p>Project Manager</p> <p>SHEQ Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>VenDocs</p> <p>Advance (LMS)</p> <p>Ven-Safe</p> |
| <p>11.2. Documents and records are stored</p>  | <p>Process: <a href="#">SHEQ Records Management</a></p>   | <p><b>Document and Record Storage</b></p> <p>All documents and records generated on the Project will be stored in VenDocs with the following exceptions:</p>  | <p>Project Manager</p> <p>SHEQ Manager</p> <p>Engineers</p>                        | <p>VenDocs</p> <p>Advance (LMS)</p> <p>Ven-Safe</p> |

| Expectations   | Procedures   | How will we meet the Expectation? (minimum requirements)  | Responsible/<br>Key Contributor | Deliverables  |
|--|--|---|---------------------------------|---|
| in appropriate systems   | Process: <a href="#">Record Keeping Requirements &amp; Review</a><br><br>Process: <a href="#">Documented Information Control</a> | <ul style="list-style-type: none"> <li>• Training documentation will be managed and stored using Advance training database</li> <li>• Incident records, investigation reports and corrective actions will be stored and managed using the SHEQ Ven-Safe system</li> </ul> Documents stored within VenDocs (e.g. procedures etc) shall be made available and accessible to subcontractors via the subcontractor portal.  | Site Supervisor                 | JDE   |
| 11.3. Regular management reviews are conducted to determine the effectiveness of the EMP | Process: <a href="#">Management System Review</a><br><br>Process: <a href="#">Manage Audit Program and Resources</a>             | <p><b>Management system reviews</b></p> <p>A review of the project’s environmental management system will be conducted at least annually (or at least once within the project period) to ensure its continuing suitability and effectiveness.</p> <p>This will involve a formal meeting scheduled by the Project Manager and attended by the management team. The management system review shall also include evaluations of systems from other functional areas.</p> <p>An agenda will be agreed prior to the meeting and minutes kept.</p> <p>Corrective actions will be stored and managed using the SHEQ Ven-Safe system.</p> | Project Manager<br>SHEQ Manager | Management system review minutes<br><br>Corrective and preventative actions in Ven-Safe |

**ELEMENT 12. AUDITING, REVIEW AND IMPROVEMENT**

We will continually improve our environmental systems and environmental performance by monitoring and reviewing their effectiveness

| Expectations   | Procedures   | How will we meet the Expectation? (minimum requirements)   | Responsible/<br>Key Contributor  | Deliverables   |
|--|--|--|--|--|
| <p>12.1. Environmental performance trends are identified, and corrective actions are implemented as required</p> | <p>Process: <a href="#">Conduct Assurance Audit</a></p> <p>Process: <a href="#">SHEQ Performance Reporting</a></p> <p>Process: <a href="#">Manage SHEQ Planned Inspections</a></p> <p>Process: <a href="#">Corrective and Preventative Action</a></p> <p><a href="#">Guideline: Leadership Accountability and H&amp;S Culture</a></p> <p><a href="#">Guideline: HSE Activities and Lead Indicators</a></p> | <p><b>Performance trends</b></p> <p>Environmental performance will be reviewed and reported at least monthly to identify trends.</p> <p>Performance will be assessed against both lead and lag measures, and relative to specific targets as agreed.</p> <p>Action plans will be developed to improve performance as required and managed using Ven-Safe.</p>  | <p>Project Manager</p> <p>SHEQ Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Monthly reports</p> <p>Action plans in Ven-Safe</p>   |
| <p>12.2. A monthly environmental report is produced and distributed</p>  | <p>Process: <a href="#">Manage Client Requirements and Project Performance</a></p> <p>Process: <a href="#">SHEQ Performance Reporting</a></p> <p>Process: <a href="#">Report Project Performance</a></p>   | <p><b>Monthly reporting</b></p> <p>A monthly environment report will be prepared for the Project Manager. This report will include the following:</p> <ul style="list-style-type: none"> <li>• Analysis of performance against project, business unit and corporate environmental targets;</li> <li>• Details of each environmental incident on the project for that period including actions taken;</li> <li>• Confirmation that this plan is compliant as a result of inspections, audits, observations and monitoring;</li> <li>• Confirmation that the NGER reporting has been completed (if required) during the month; and</li> <li>• Any environmental innovations implemented on the project.</li> </ul> | <p>Project Manager</p> <p>SHEQ Manager</p> <p>Engineers</p> <p>Site Supervisor</p> | <p>Project monthly reports</p> <p>Inspections reports</p> <p>Audit reports</p> <p>Monitoring reports and records</p> |

## ANNEX A. GLOSSARY OF TERMS

The following table outlines key terms used in this document and associated procedures.

| Term                            | Description  |
|---------------------------------|--|
| Advance LMS                     | Training and competency records repository for employees and subcontractors  |
| BMS                             | Ventia Business Management System is the overarching system that provides the necessary information and workflow to manage all business and project activities which incorporates VenDocs and InVentia   |
| BU                              | Business Unit  |
| CAR                             | Corrective actions register  |
| EMP                             | Environmental management plan  |
| EMS                             | Environmental management system  |
| H&S                             | Health and safety  |
| HPI                             | High potential incidents   |
| InHealth                        | System that records employee health and return to work data  |
| InVentia                        | Ventia's corporate knowledge management system and the central place where all Business Processes are stored – links to documents in VenDocs   |
| JDE                             | JD Edwards is the procurement, subcontract management, asset management, cost and forecasting system   |
| Key Performance Indicator (KPI) | Is a business/project metric used to evaluate factors that are crucial to the success of an organisation (business or project performance).  |
| NCR                             | Non-conformance report   |
| NGER                            | National greenhouse and energy reporting   |
| PFAS                            | Per- and poly fluoroalkyl substances   |
| Project                         | Taylors Rd Soil Washing Facility   |
| Project Manager                 | The person responsible for project management of all operational matters including financial management, reporting, resources, planning with other project personnel   |
| Risk                            | The chance of something happening that will have an impact upon objectives. It is measured in terms of consequence and likelihood. For this plan, also encompasses opportunity.  |
| Risk Assessment                 | A risk assessment is the logical and systematic approach to identifying hazards, assessing risks, and implementing and maintaining controls in order to reduce risk to an acceptable level.  |
| Risk Register                   | A register of the identified issues, risks/opportunities, analysis, evaluation and treatments for the project.   |
| Safe work procedure             | Provides the direction (instruction) on what Ventia expects to be in place to safely manage a particular work activity or safety issue (e.g. Concrete Pumping, Access to Tunnel Works)   |
| Safe work system (SWS)          | Describes the procedures, forms and processes that the project implements to ensure that particular activities are executed in a risk-controlled way. The structure and format of a safe work system will depend on the complexity and risk associated with the task it describes. |
| SDS                             | Safety data sheet  |
| SharePoint                      | Used by the Ventia projects this system stores all day to day operational documents and records  |
| SOP                             | Standard Operating Procedures  |
| SHEQ                            | Safety, Health, Environment and Quality  |
| SHEQ Manager                    | The manager responsible for auditing, reviewing and assisting all managers to maintain the POQMP (QAPP) H&S, Environmental and Emergency Response requirements of the business.  |

|               |   |
|---------------|---|
| SHEWMS        | Safety, Health, Environment and Quality Work Method Statements  |
| Site          | Taylor's Rd Soil Washing Facility   |
| SOW           | Scope of Works  |
| SSA           | Soil Source Areas   |
| Subcontractor | A subcontractor is a company, partnership, trust or individual business under a signed contract to carry out works for the principal contractor   |
| Toolbox Talk  | A tool box meeting is an interactive informal meeting of workgroup members. Foreseeable work hazards are discussed, and controls planned.   |
| VenChem       | Ventia system used to track chemicals on sites including SDS and chemical risk assessments  |
| VenDocs       | Ventia's Document Management System – repository for management plans, project procedures and tools (forms, templates, registers and checklists)  |
| VenSafe       | Ventia's event reporting and safety management system which includes recording and reporting incidents, actions management, notifications management, automated (scheduled) reporting, interactions, inspections and audits |
| Ventia        | Ventia Utility Services - a division of Ventia  |

## ANNEX B. ENVIRONMENTAL ROLES AND RESPONSIBILITIES

The following table summarises the responsibilities identified in this plan.

R= Responsible, C = Key contributor

|   | Project Manager | Engineer | SHEQ Manager/Advisor | Site Supervisor |
|---|-----------------|----------|----------------------|-----------------|
| <b>ELEMENT 1. LEADERSHIP, ACCOUNTABILITY AND CULTURE</b>  |                 |          |                      |                 |
| 1.1 Environmental accountabilities, roles and responsibilities for managers, staff, employees and subcontractors are clearly defined, documented and communicated | R               |          | C                    |                 |
| 1.2 Environmental leadership and commitment is demonstrated through measurable participation in environmental management  | R               | C        | C                    | C               |
| 1.3 Environmental expectations are clearly defined with appropriate reward and disciplinary processes in place  | R               |          | C                    |                 |
| <b>ELEMENT 2. PLANNING</b>  |                 |          |                      |                 |
| 2.1 Adequate resources are provided to effectively implement the EMP  | R               |          | C                    |                 |
| 2.2 IT Systems are defined and established  | R               |          | C                    |                 |
| 2.3 Environmental sub-plans are prepared for significant environmental hazards  | R               |          | C                    |                 |
| 2.4 Work is planned and executed to ensure compliance   | R               | C        | C                    | C               |
| 2.5 Inspections, observations and monitoring are performed to ensure compliance is maintained   | R               | C        | C                    | C               |
| 2.6. All energy and greenhouse data collected and entered into JDE  | R               |          | C                    |                 |
| 2.7. Personnel on the site have access to current versions of relevant legislation, standards and codes of practice   | R               |          | C                    |                 |
| <b>ELEMENT 3. LEGAL COMPLIANCE</b>  |                 |          |                      |                 |
| 3.1 All necessary environmental approvals are obtained prior to commencing relevant works and surrendered on completion   | R               | C        | C                    | C               |
| 3.2 All non-compliances are reported as incidents   | R               | C        | C                    | C               |
| <b>ELEMENT 4. RISK MANAGEMENT</b>   |                 |          |                      |                 |
| 4.1 Systematic processes are defined and implemented for identifying environmental risks and opportunities at all stages of the project                           | R               | C        | C                    | C               |
| 4.2 Identified risks and opportunities are analysed and evaluated according to agreed criteria and recorded in a risk register                                    | R               | C        | C                    | C               |
| 4.3 Environmental controls appropriate to the level of risk are identified, documented and implemented  | R               | C        | C                    | C               |
| 4.4 Feasible opportunities are implemented  | R               | C        | C                    | C               |
| 4.5 Identified environmental risks and controls are communicated to all relevant personnel  | R               | C        | C                    | C               |
| 4.6 Regular inspections and monitoring are conducted to check effectiveness of controls   | R               | C        | C                    | C               |
| 4.7. Environmental risks and controls are regularly reviewed  | R               | C        | C                    | C               |
| <b>ELEMENT 5. CHANGE MANAGEMENT</b>   |                 |          |                      |                 |
| 5.1 Changes to the planned operations that have potential environmental consequences are identified   | R               | C        | C                    | C               |

R= Responsible, C = Key contributor

|   | Project Manager | Engineer | SHEQ Manager/Advisor | Site Supervisor |
|---|-----------------|----------|----------------------|-----------------|
| 5.2 Risks associated with identified changes are assessed and controlled before changes are implemented                                       | R               | C        | C                    | C               |
| 5.3 All changes with environmental consequences are authorised before they are implemented  | R               | C        | C                    | C               |
| 5.4 Controls associated with change are communicated to all affected personnel  | R               | C        | C                    | C               |
| <b>ELEMENT 6. COMMUNICATION, CONSULTATION AND HSE COMMITTEES</b>  |                 |          |                      |                 |
| 6.1 External environmental stakeholders are identified  | R               |          | C                    |                 |
| 6.2 Relationships with external stakeholders are effectively managed  | R               | C        | C                    | C               |
| 6.3. Internal consultative forums are established with regular meetings scheduled, conducted, documented and communicated                     | R               | C        | C                    | C               |
| 6.4. Environmental complaints and enquiries are recorded and responded to appropriately   | R               | C        | C                    | C               |
| 6.5. The effectiveness of internal and external stakeholder engagement is evaluated and improved  | R               | C        | C                    | C               |
| <b>ELEMENT 7. TRAINING AND COMPETENCY</b>   |                 |          |                      |                 |
| 7.1 All personnel have completed an induction containing relevant environmental information before they are authorised to work on the project | R               | C        | C                    | C               |
| 7.2 A training plan is developed and documented   | R               |          | C                    |                 |
| 7.3 Personnel are trained and assessed according to the training plan   | R               | C        | C                    | C               |
| 7.4. Training records are maintained and accessible to relevant personnel   | R               |          | C                    |                 |
| <b>ELEMENT 8. SUBCONTRACTOR AND SUPPLIER RELATIONSHIPS</b>  |                 |          |                      |                 |
| 8.1. Selection processes ensure that subcontractors meet Ventia' minimum environmental requirements   | R               | C        | C                    | C               |
| 8.2. Planning requirements of all subcontractor work scopes are completed and communicated prior to commencing work                           | R               | C        | C                    | C               |
| 8.3. Subcontractor documentation is submitted and reviewed to meet project requirements   | R               |          | C                    |                 |
| 8.4. Subcontractors actively participate in environmental management on the project   | R               | C        | C                    | C               |
| 8.5. Subcontractors are reviewed to assess their performance and compliance with our minimum environmental requirements                       | R               | C        | C                    | C               |
| <b>ELEMENT 9. INCIDENT MANAGEMENT</b>   |                 |          |                      |                 |
| 9.1. All incidents are followed by appropriate response and notification  | R               | C        | C                    | C               |
| 9.2. All incidents are entered into and closed out in the SHEQ Ven-Safe system  | R               | C        | C                    | C               |
| 9.3. Incident investigations are conducted appropriate to the type of incident  | R               |          | C                    |                 |
| 9.4. All personnel conducting incident investigations are trained to competently perform the task   | R               |          | C                    |                 |
| 9.5. Corrective and preventative actions are taken after incidents and lessons are shared with other projects                                 | R               | C        | C                    | C               |
| <b>ELEMENT 10. EMERGENCY PLANNING AND RESPONSE</b>  |                 |          |                      |                 |
| 10.1. Potential emergencies are identified using a formal risk assessment process   | R               |          | C                    |                 |

R= Responsible, C = Key contributor

|  | Project Manager | Engineer |  | SHEQ Manager/Advisor | Site Supervisor |
|--|-----------------|----------|--|----------------------|-----------------|
| 10.2. Emergency response plans and procedures are developed and regularly reviewed                     | R               | C        |  | C                    | C               |
| 10.3. Adequate resources are provided to effectively implement emergency response plans and procedures | R               | C        |  | C                    | C               |
| 10.4. Environmental emergency response drills are conducted  | R               | C        |  | C                    | C               |
| 10.5. Employees, contractors and visitors are given appropriate emergency response training            | R               | C        |  | C                    | C               |
| <b>ELEMENT 11. DOCUMENT AND RECORD MANAGEMENT</b>  |                 |          |  |                      |                 |
| 11.1 Current versions of all relevant documents and records are available and controlled               | R               |          |  | C                    |                 |
| 11.2 Documents and records are stored in the appropriate systems                                       | R               |          |  | C                    |                 |
| 11.3 Regular management reviews are conducted to determine the effectiveness of the EMP                | R               |          |  | C                    |                 |
| <b>ELEMENT 12. AUDITING , REVIEW AND IMPROVEMENT</b>   |                 |          |  |                      |                 |
| 12.1 Environmental performance trends are identified and corrective actions                            | R               |          |  | C                    |                 |
| 12.2 A monthly environmental report is produced and distributed  | R               |          |  | C                    |                 |

## **ANNEX C. PROJECT RISK REGISTER**

The Project Risk Register is attached over page.

## **ANNEX D. BASE LAYOUT MAP**

The Base Layout Map is attached over page.

## **ANNEX E. ENVIRONMENTAL CONTROL PLAN**

The Environmental Control Plan is attached over page.

## **ANNEX F. SUB-PLANS**

The following sub-plans will be developed:

- Sustainability Management
- Soil and Water Management
- Hazardous Chemicals and Spill Response Management
- Biodiversity Management
- Air Quality Management
- Noise and Vibration Management
- Waste Management
- Excavation and Stockpiling Management