

Environmental Management System

Project: UNSW Cliffbrook Estate Building CC3 Project

Belmadar Pty Ltd

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PLAN

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Environmental Management Plan

Project: UNSW Cliffbrook Estate Building CC3 Project

Revision - 03

This EMS was completed and reviewed by:

Name	Position	Date	Signature
Brett Drew	HSEQ Director	16/11/2021	
Linda Yazbek	Systems Manager	16/11/2021	

This EMS reviewed and understood for responsibilities by:

Name	Position	Date	Signature
Brett Drew	Site Manager		
TBA	Site Engineer		

This EMS was reviewed and approved by:

Name	Position	Date	Signature
Brett Drew	HSEQ Director	16/11/2021	

CONTROLLED DOCUMENT

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1.0 GENERAL

1.1 Purpose

This Environmental Management Plan (EMP) provides a coordinated system to manage and control the processes used to address environmental obligations required under the contract with UNSW Estate Management and applicable legislation. This document operates at a project level to detail environmental strategies and procedures to meet objectives and sustain environmental standards. This Plan incorporates the requirements of the Belmadar Integrated Management System, which is accredited to ISO14001.

1.2 Contact Details

The person responsible for the project is Brett Drew. Brett's mobile number is 0414228823 and email address is brett.drew@belmadar.com.au.

1.3 Scope

The UNSW Cliffbrook Estate project will include alterations to Building CC3 as follows;

- Remove the bi-fold doors in the openings in the eastern elevation and replace with double doors for accessible access.
- Restore stone works.
- Remove and reconfigure internal wall.
- Install new floor finish and operable wall.
- Remove and install new kitchenette.
- Shutdown and shift electrical switchboard.
- Maintenance works, remove and replace roof

1.4 Revision

Revision Number	Date Updated	Item Updated	Updated By
01	27/10/2021	Complete Revision	Systems Manager

Next Review

Reviewed	Reviewed By	Next Review (If no Incidents occur onsite)
11/03/2021	Systems Manager, HSEQ Director & Project Manager	11/06/2021

1.5 Distribution

The master ‘controlled’ EMP will be kept in the project’s document management system, where personnel can access it when required. All printed copies / versions of this EMP will be considered ‘uncontrolled’. The HSEQ Director has reviewed the current version of the EMP and has been approved by the Project Manager for distribution prior to work commencement on site.

2.0 REFERENCES, STANDARDS, CODES AND REGULATIONS

This plan was compiled in accordance with relevant Australian Standards, legislation, codes of practice and industry regulations, and will be adhered to at a project level. Please refer to **Appendix A** for a register of all applicable legislative requirements related to the project.

3.0 ENVIRONMENTAL POLICY

Belmadar’s Environmental Policy must be:

- Displayed in an accessible location in the site office
- Communicated to site personnel prior to project commencement through induction
- Complied with by all personnel associated with the project

Refer to **Appendix B** for Belmadar’s Environmental Policy.

4.0 OBJECTIVES

Environmental goals and objectives have been established in accordance with relevant legislation / requirements and will be monitored by senior management. Objectives are displayed in the table below:

Aspect	Objective	Target	Controls	Responsibility
Noise / Vibration	To minimise noise and vibration disturbance to site neighbours	No complaints and comply with EPA limits	14.1 Noise and Vibration	Excavation Contractor, Belmadar Supervisor
Dust / Air pollution	To minimise and confine dust within the site	No complaints and comply with EPA requirements	14.2 Dust / Air Quality	All Contractors and Belmadar Supervisors

Water Quality	To minimise impact on natural water courses from de-watering operations	No EPA fines. Meet water quality targets of 14.3	14.3 Water Quality	Earthworks Contractor, Belmadar Supervisor
Erosion and Sediment Control	To minimise erosion on site during the construction period and prevent dirty water and sediment entering stormwater system	No EPA fines. Meet water quality targets of 14.4	14.4 Erosion and Sediment Control	Earthworks Contractor, Belmadar Supervisor
Chemicals / Hazardous Materials	To control spills and minimise potential for harm	No environmental harm	14.5 Chemicals / Hazardous Materials	All Contractors and Belmadar Supervisors
Land Contamination	To control any existing contaminated soil excavated on site	No EPA fines. Comply with soil contaminant limits	14.6 Land Contamination	Earthworks Contractor, Belmadar Supervisor
Waste Minimisation / Management	To control all waste materials generated on the site and encourage recycling	Recycling Targets: as defined in 14.7	14.7 Waste Minimisation / Management	All Contractors and Belmadar Supervisors
Heritage Management	To comply with heritage legislation and ensure that existing heritage sites are protected from construction activities.	No disturbance or damage to existing known heritage sites or items.	14.8 Heritage Management	Earthworks Contractor, Belmadar Supervisor
Flora / Fauna Management	To protect flora assets identified in the Tree Protection Plan	No harm to flora assets	14.9 Flora / Fauna Management	Earthworks / Landscape Contractors, Belmadar Supervisor

Progress towards these objectives is to be monitored through internal audits conducted by the Systems Manager and HSEQ Director, and reported in the monthly HSEQ report.

5.0 ROLES AND RESPONSIBILITIES

The responsibilities associated with environmental management apply to all personnel of the Belmadar team. The following organisational chart outlines the Belmadar personnel responsible for the implementation of all aspects of the EMS. The chart is to be updated if any changes in circumstances arise such as legislative amendments or reported incidents.

	Managing Director	HSEQ Director	Construction Director	Pre-Construction Director	Systems Manager	Project Manager	Site Manager	Site Engineer	Foreman	Subcontractor
Provide resources to ensure the Environmental Management System adheres to environmental legislation, standards and codes of practice.	✗	✗	✗	✗	✗					
Promote a positive workplace environmental culture.	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗
Establish project specific objectives and targets. Monitor and report accordingly.		✗				✗	✗	✗		
Complete project specific environmental documents using templates						✗	✗	✗		
Establish the environmental requirements for site establishment and planning requirements.						✗	✗	✗		
Monitor for changes in environmental legislation					✗					
Establish and maintain environmental registers including legislation, training and objectives.		✗			✗					
Identify and assess competency of employees and facilitate any training requirements		✗			✗	✗	✗			
Determine and assess requirements for environmental monitoring (ie. noise, air and dust) and implement.						✗	✗			
Provide site personnel with relevant environmental management documentation.					✗	✗				
Obtain environmental documentation from each subcontractor prior to commencing. Review and identify required changes prior to work commencement							✗	✗		
Assess subcontractors' ability to comply with the project environmental systems and requirements							✗	✗		
Conduct inductions for all personnel attending site and maintain records.							✗	✗		
Complete an environmental risk assessment at commencement of the project and update as required						✗	✗	✗		
Maintain register of all onsite hazardous materials, chemicals or dangerous goods.							✗	✗		
Obtain safety data sheets and provide adequate chemicals and hazardous materials storage onsite.							✗	✗		
Conduct environmental inspections, distribute for action, obtain sign-offs and close out.					✗	✗	✗	✗		

Attend projects to monitor and discuss Environmental issues with project management, supervisors and workers	✘	✘			✘					
Schedule and conduct environmental audits of Subcontractors. Distribute report and monitor status		✘			✘					
	Managing Director	HSEQ Director	Construction Director	Pre-Construction Director	Systems Manager	Project Manager	Site Manager	Site Engineer	Foreman	Subcontractor
Conduct environmental consultation and communication when necessary	✘	✘	✘	✘	✘	✘	✘	✘	✘	✘
Implement emergency response procedures as outlined in the site Emergency Response Plan						✘	✘	✘	✘	✘
Report and investigate environmental incidents. Monitor corrective actions and distribute any lessons learnt		✘					✘			
Report and distribute non-conformances and apply corrective actions. Review effectiveness of the applied corrective actions.		✘			✘	✘	✘	✘	✘	✘
Implement environmental sub-plans and procedures		✘			✘	✘	✘	✘	✘	✘
Obtain feedback for both internal/external training conducted and evaluate the effectiveness of the training programs		✘								
Review procedures and forms resulting from changes in legislation, regulation, standards, codes of practices and incidents					✘					
Attend stake holder meetings to assess environmental performance, identify and document lessons learnt	✘	✘	✘	✘						
Ensure that independent audits of the Environmental Management Systems are conducted		✘			✘					
Review environmental performance through preparation of the monthly HSEQ report		✘			✘					
Comply with legal and contractual requirements	✘	✘	✘	✘	✘	✘	✘	✘	✘	✘

6.0 TRAINING

All project personnel will receive training of environmental management during site induction to ensure that responsibilities are understood and workers are competent to carry out the work in line with environmental requirements. The Site Manager is responsible for coordinating environmental training, forwarding training records and assessing the effectiveness of training at project level.

Project Induction

The Site Manager shall ensure that the Project Induction includes the environmental risks and control strategies identified for the project. The following will be included during induction:

- Belmadar's Environmental Policy

- Site environmental objectives and goals
- Site environmental rules and consequences for non-compliance
- Potential consequences of departure from these rules
- Emergency / incident response and management

Belmadar site Supervisors shall be inducted into the requirements of this plan and the requirements of Environmental Control Programs and other management controls relevant to the work they are managing.

Internal Training

The Site Manager shall ensure all workers performing duties required by this plan are properly trained. Where a need is identified, arrangements shall be made for the appropriate training to be provided. Training records from external providers are sent to the Systems Manager following the completion of training.

Training of Subcontractors

The Site Manager or nominee shall assess the environmental control requirements of the subcontract package and, where considered necessary, ensure Subcontractors conduct specific environmental training sessions (through toolbox meetings or external providers etc.).

All Subcontractor site employees shall attend the Project Induction that includes general awareness topics and the key environmental issues for the project. It also includes information on emergency response actions.

7.0 CONSULTANCY AND COMMUNICATION

Communication with External Stakeholders

Communications on significant environmental aspects shall be established with external stakeholders.

Belmadar will also cooperate with the Client and the responsible authority in any required community consultation initiatives or emergency response.

Complaints Management

All complaints shall be treated with respect and referred to the Project Manager for action. Incidents including complaints are summarised in the Belmadar Monthly Report.

Communication Actions

Subject	Action	Recipient	Frequency
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EMP	Site Manager to distribute for implementation	Client and Belmadar workers	Project commencement and following each revision
Pollution incident	Workers to report incident	SM/PM	Immediately after personnel safety check
	SM to telephone details	SM/PM, Client, EPA	Same day
Pollution limit exceedance	SM to raise Incident Record	SM/PM, SafeWork NSW or EPA as applicable	Next day
Site Meetings - Environmental actions	Record in minutes of project coordination meetings	As per distribution list on minutes	Each meeting
Community notification	Project Information letter with 24-hour contact number	Adjoining land users likely to be affected	As determined by Management
Public complaints receipt	Workers to report	SM/PM	Immediate
Complaint response	SM to telephone	Complainant	Within 2 hours (during working hours)
	SM/Foreman to submit written report	Client and Belmadar management	Within 5 working days
Media	SPM as per Media procedure	Belmadar Management	Immediately
Discovery of threatened fauna	SM/Foreman to telephone details	NPWS	Same day
Discovery of archaeological material, heritage items	SM/Foreman to telephone details	Architect/Heritage Office.	Same day
Discovery of skeletal material	SM/Foreman to telephone details	Police	Same day
Environmental monitoring checks	SM/Foreman to complete HSE checklist	Site File	Weekly
Environmental performance reporting	Site Manager to report	Client and Internal Reports	Monthly
HSE Audits	HSEQ Manager to notify and provide report	SM/SPM	Monthly
Management Review	PM to review and update EMP	Site team	Six monthly or resultant audit finding

8.0 OPERATIONAL CONTROL

8.1 Hold Points

Hold points are activities that cannot proceed without review and approval by the relevant authority. Specific activities cannot continue until certain procedures or requirements are

met that require sign off by a member of the site team. Hold points are to be implemented into the planning stage of the project to avoid unexpected delays or bottlenecks. The following table identifies hold points that have the potential to impact environmental performance and objectives.

Hold Point	Required Action	Authority
All construction work	A Project specific Environmental Management plan has been designed and approved by the site team.	Project Manager
Dewatering	A dewatering permit is to be completed and the water quality is to be tested and only dispersed if it meets required standards	Site Manager
Vegetation Removal	Clearing zones are identified with signage or any equivalent and notes are made on shop drawings. Protected areas must be clearly outlined and avoided.	Site Manager
Transport of Dangerous Goods	Must have storage facilities prepared before goods are transported on site. Transport vehicles must have covered loads and be operated by licensing-holding personnel	Site Manager
Chemical / hazardous materials use	All chemicals and hazardous materials transported on site must have a storage facility prepared, have up to date SDS and be included in the register	Site Manager
Removal of contaminated soil / spoiled land	Soil must be classified prior to leaving site and a licenced facility is to be approved for disposal	Site Manager
Groundwork	Soil and sediment erosion control measures and management plans are in place, and staff are trained in awareness and competency.	Site Manager

Activities that proceed without correct actions undertaken or without authorisation from the correct authority will be deemed a system non-conformance and requires elevation to the HSEQ Director or Managing Director if necessary.

8.2 Design

Design is to be conducted in a manner that incorporates sustainability and preservation of the broader environment by avoiding adverse environmental impacts. Belmadar has a responsibility to promote sustainability through the design phase by adopting practices that do not degrade or pollute the environment wherever possible.

The following are to be considered during the design phase:

- Energy-efficient operation
- Using recycled or reusable materials where possible
- Improving efficiency to minimise natural resources used
- Environmental codes of practice, legislation, regulations and standards
- Environmental targets and objectives
- Environmental hazard and risk control measures
- Alternative systems that promote clean practices and sustainability
- Consultation from environmental specialists

The design and construct process is to incorporate the above factors and any extra practices that arise from meetings or consultations. Requirements and resources for environmental compliance will also be described in the design and construct procedure.

8.3 Procurement

The provision of goods and services by subcontracts or suppliers is to be done in consideration of environmental impacts during the selection process. Suppliers are to be evaluated on their ability to conform to environmental regulations and practices as well as their history of environmental non-conformances. A weighted score is to be given using the ***Subcontractor selection and procurement scorecard*** that can be used comparatively against other suppliers to make an environmentally conscious selection. Suppliers with a history of environmental non-conformance or with policies that do not correlate with Belmadar's will require escalation to the HSEQ Director or Managing Director for review. Suppliers of chemicals and hazardous materials are required to submit up to date SDS' and a register is to be maintained and updated by the site manager. Subcontractors' SWMS are to include environmental procedures and practices, and will be assessed by the site manager during induction. Weekly site walks will include monitoring and evaluation of the subcontractor's environmental procedures and ensure they operate in accordance with their SWMS and environmental policies.

8.4 Transport and Storage

All transport, handling and storage of goods is to be done in accordance with Belmadar's quality management plan. Chemicals and hazardous materials are to be transported, handled and stored in accordance with supplied SDS' as well as the ***Dangerous Goods Act 2008***.

Transport:

Transport documentation must be included upon delivery of each load unless an exemption has been approved. The following information must be included in the documentation:

- Contact details of workplace
- Contact details of transporter

- Transport date, origin and destination
- Product information including name, quantity or classification

Storage:

Materials are to be kept in designated storage areas under the discretion of the site manager, in areas clear of obstructions, access ways and water ways. Chemicals and hazardous materials require caution with handling and should be located nearby to the drop-off zone to minimise risk of spills and damage to the environment. Any provided SDS' should be stored with the respective products, with the register kept in the site office.

8.5 Plant and Equipment

All plant to be brought on site must be documented in **Form F1.4 Plant ID Register** prior to use. Plant is to be inspected and services to ensure it meets the criteria outlined in the form **F1.3 Mobile plant requirements**.

Plant and equipment used by Belmadar will be monitored and maintained at intervals in accordance with **F1.7 Inspection Test Plan**. In particular, the following requirements apply:

- Plant will be inspected and serviced prior to operation by the site manager. If major defects or mechanical faults are discovered, a certified engineer or manufacturer is required for sign off.
- Plant will be serviced, refuelled and washed-down in designated areas, such as concrete wash-out bays, where runoff can be captured and disposed of
- Fuelling will be conducted in bunded areas.
- Plant will be driven and operated only in approved areas, with relevant markings or signage, by personnel holding licences..
- Pollution and noise/vibration control devices will be fitted to plant where practical.

Refer to Appendix 3 for further project specific information on environmental controls for plant and equipment.

9.0 MONITORING

The Site Manager shall ensure that the required monitoring and inspection activities for the project/area are implemented.

Environmental Monitoring

Specific environmental monitoring requirements are included in section **14.0 Environmental**

Management Sub-Plans and are generally the responsibility of the applicable subcontractor performing the work and Belmadar supervisors.

Where required, specialist consultants may be engaged to help establish monitoring systems and to train relevant personnel in the taking of samples, reading of instruments as well as analysis and recording of results.

Any environmental monitoring or testing agencies used on the project shall be appropriately qualified for their applicable activity.

Inspection

Surveillance inspections are conducted by the Site Manager and/or Foremen as part of their daily routine, with significant issues recorded (Site Diary or Action Notice) as applicable for resolution.

The Site Manager or responsible Foreman will also conduct a HSEQ walk which includes a check of environmental issues to confirm the environmental controls are being implemented. Inspections are recorded on the checklist for follow up, with significant deficiencies raised as a non-compliance Notice (or electronic equivalent as applicable).

10.0 EMERGENCY RESPONSE

The Emergency Response Manual and evacuation plan are kept in the office and displayed on the site notice board respectively. Subcontractors and other site personnel are informed of the procedures and location of the plan during induction. Refer to Emergency Response Manual for further details.

11.0 INCIDENTS AND NON-CONFORMANCES

11.1 Incident Management

Any environmental issues (potential or actual harm) which are considered as non-compliant with the requirements of this plan shall be resolved in accordance with procedure 'Incident Management'.

The site manager / supervisor will ensure that all environmental incidents / non-conformances occurring in or around the site involving Belmadar personnel, subcontractors, visitors or passers-by, external authorities, Unions etc. are investigated and reported regardless of how minor they appear at the time of the occurrence.

Major or serious incidents which are deemed notifiable will be investigated and reported to the appropriate regulatory authority i.e., NSW Environment Protection Authority (EPA) by the HSEQ Director.

Incident reporting and notification to Planning must be conducted in accordance with Condition A17 of State Significant Development consent. Note that incident report must be emailed to the Department within 7 days of awareness of the incident. A written notification must be emailed to the department by the HSEQ director, the address is compliance@planning.nsw.gov.au. The details of the notification must include items i) – viii) in accordance with Condition A17 part A.

11.2 Non-Conformances and Corrective Actions

Any non-conformance requires a “Task Observation” on Procore to be completed. Situations that require a report are:

- Non-compliance with the site rules
- Non-compliance with environmental requirements
- Following a site incident or accident if changes are required to the Belmadar system to prevent a re-occurrence;
- Actions arising from audits site / weekly inspections, management reviews and weekly site team / subcontractor meetings

The non-conformance shall be completed and issued to the offending party. Copies of the NCR shall be issued to Belmadar project manager, the subcontractor site supervisor, HSEQ director and systems manager via Procore.

The project manager and/or site manager will decide on the appropriate disposition and corrective actions. Non-conformances raised as a result of failing to meet environmental legislation will be reviewed by the HSEQ Director to confirm if systems need to be updated and if any company wide alerts, correspondence is required

Non-Compliance reporting and notification to Planning must be conducted in accordance with Condition A18 of State Significant Development consent. Note that the non-compliance report must be emailed to the Department within 7 days of becoming aware of the non-compliance. A written notification must be emailed to the department by the HSEQ director, the address is compliance@planning.nsw.gov.au. The details of the notification must be in accordance with A19 of the of State Significant Development consent.

Refer to the Safety Management System for further details on the NCR / CRA process.

12.0 AUDITS

The Site Manager and Health, Safety, Environmental & Quality Director (HSEQ Director) shall ensure that the audit requirements of the EMP are being implemented. The Project Manager shall ensure that the project reporting and review requirements are implemented.

Auditing

The HSEQ Director and Systems Manager shall conduct project level audits to confirm compliance with the requirements of this EMP in accordance with the Belmadar 'Audits' procedure. Inspections are conducted at monthly intervals as specified in the Safety Management System.

Subcontractors are generally not formally audited for environment unless a requirement for a full EMP exists within their contract. Environmental implementation inspections (as described in section 5.2) have been determined as the appropriate mechanism used to ensure Subcontractors comply with the project environmental control measures documented in this EMP.

Reporting

The Project Manager shall report monthly on the implementation of this plan, including all significant events, the status of any non-compliance, complaints and audits required by the contract and this plan. These results are communicated through Procore to be accessed by the site team as well as in the monthly HSEQ Report.

Management Review

Management reviews including a review of this plan, shall be carried out in accordance with Belmadar procedure 'Management Review'.

13.0 ENVIRONMENTAL MANAGEMENT SUB PLANS

13.1 Noise & Vibration

Targets:	
No noise or vibration complaints resulting from construction works	
No unnecessary or unreasonable noise or vibration	
No noise and vibration impact on external receptors.	
No structural damage resulting from vibrations to any surrounding structures	
Controls	Responsibility
No audible work will be undertaken outside of 9:00 am – 12:00 pm and 2:00 pm – 5:00pm Monday to Friday and 9:00 am – 12:00pm Saturday. Where work outside these hours is	Site Manager / Subcontractor

required, approval must be gained prior to commencement	
Nearby residents are to be notified of works exceeding 10DB during construction	Site Manager
Site offices and sheds will be positioned to have no impact on the noise amenity of nearby sensitive receptors	Site Manager
All plant and equipment to be fitted with applicable noise control equipment as per the manufacturer's specifications. Noise-generating equipment will be orientated away from sensitive areas where possible. Regular inspections will be undertaken to ensure all plant and equipment are in good working order and are operated correctly	Foreman / Subcontractor
Loading / unloading activities are to be conducted away from sensitive areas and during construction hours as mentioned above	Foreman / Subcontractor
On-site generators are to be positioned away from existing buildings to buffer noise and vibration.	Site Manager
Awareness training and information will be provided to personnel in relation to noise and vibration requirements during site induction	Site Manager
Where practical, loud processes will be substituted with alternative processes	Site Manager / Subcontractor
Monitoring	Responsibility
Complaints to be recorded on Procore "Observations" tab and closed out accordingly	Site Manager / Site Engineer
Daily inspection (pre-start) checks to be conducted for each activity, where noise / vibration control methods are to be outlined where applicable	Site Manager
Routine maintenance and servicing of equipment to be carried out as specified by manufacturer	Foreman / Subcontractors
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director

13.2 Dust & Air Quality

Targets	
No dust complaints from construction works	
No dust impacting off-site activities or surrounding residences	
No visual evidence of deposited dust or suspended particulate matter	
Controls	Responsibility
Using water carts, tankers or other suitable equipment to suppress dust by spraying work areas	Foreman / Subcontractor
Haul vehicles loads are to be covered and tail gates closed when operating on public roads. All vehicles are also to be restricted to 10km/h when on site	Subcontractor
Mud is to be manually removed from haul vehicles and other construction equipment prior to entering public roads.	Foreman / Subcontractor
Activities generating dust (including spray painting) are to be rescheduled during periods of high wind, unless a physical barrier can be erected perpendicular to prevailing winds	Site Manager
Awareness training in the need to minimise dust during to be conducted at site inductions as well as toolbox talks.	Site Manager
Any asbestos discovered on the project to be left undisturbed and subsequently managed in accordance with the Safety Management System	All personnel
No burning of vegetation or other materials is permitted	All personnel
Monitoring	Responsibility
Complaints to be recorded on Procore "Observations" tab and closed out accordingly	Site Manager / Site Engineer
Daily pre-start checks to be conducted for each activity, where dust / air quality control methods are to be outlined where applicable	Site Manager
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director

13.3 Water Quality / Erosion & Sediment Control

Targets	
All discharged water meets minimum water quality criteria as per EPA	
No notable change in groundwater quality and levels during dewatering activities	
No sediment impacts to surrounding waterways and the environment resulting from activities	
Prevention of water quality impacts off site as a result of erosion and sedimentation	
Controls	Responsibility
Sediment fences, straw bales, catch drains, diversion drains, sandbags and similar controls will be designed appropriately for application	Subcontractor
Permanent drainage is to be installed at the earliest date possible.	Subcontractor
All water will be discharged in accordance with legislation and Belmadar approval. It must be tested and treated if necessary to ensure that it meets water quality criteria.	Site Manager / Subcontractor
Top soil/mulch stockpiles must not exceed 2 metres in height. Stockpiles will be located clear of watercourses and drainage	Subcontractor
Sandbag check dams will be used to protect stormwater drains where required	Subcontractor
All erosion and sediment control works will be removed immediately prior to final completion. All surfaces are to be returned to pre-existing conditions	Subcontractor
A designated washout area and purpose built bunded structure will be provided for concrete pumps.	Site Manager
All spills on site must be cleaned up immediately to minimise pollution of stormwater or groundwater. If contaminated water requires discharge it will be sampled and analysed	Site Manager / Subcontractor
For sites with a soil disturbance greater than 2,500m ² or with slopes >10%, an Erosion and Sediment Control Plan is to be prepared by a Certified Engineer / Practitioner	Site Manager / Project Manager
Monitoring	Responsibility
All water quality data including quantity, quality and dates of water release are kept in the project records.	Site Manager
Daily pre-start checks to be conducted for each activity, where water quality / erosion control methods are to be outlined where applicable	Site Manager
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director
Erosion and sediment control methods to be monitored in weekly site walks	Site Manager / Foreman

13.4 Land Contamination

Targets	
No spread of contaminants on site resulting from activities	
No pollution events affecting the surrounding environment and waterways due to contaminated land	
Tracking of all off-site movement of any contaminated grounds	
Controls	Responsibility
Materials suspected to be contaminated may be: visibly different to surrounding material, fibrous in nature, exhibits a strong odours or has other unexpected characteristics. Materials suspected of this are immediately to be reported to site manager.	Subcontractor
Where a site has known contamination which has not been controlled, or unexpected contaminants are identified underground, an environmental consultant/professional is to assess the site and determine whether a Contaminated Site Investigation is necessary	Site Manager / Environmental Consultant
All contaminated land removed from the site is to be done in accordance with the approved plan for the management of contamination and disposed of at a licensed facility	Subcontractor
A Waste Transport Certificate for all contaminated material is required from the responsible contractor.	Subcontractor

All contaminated material is to be managed as per legislative or EPA requirements, including testing and assessment	Site manager / Subcontractor
Control measures are to be implemented to divert surface run-off away from potentially contaminated ground. Any surface run-off already contaminated by exposure to contaminated ground must be captured and kept separate	Site Manager / Subcontractor
Underground storage tanks identified during site work that require removal will be conducted in accordance with all relevant environmental and workplace safety standards. A Geotechnical Engineer is to provide guidance and recommendations	Site Manager / Geotechnical Engineer
Monitoring	Responsibility
Receipts / reports for disposing any hazardous material found underground will be filed on site	Site Manager
The finding of any contaminated lands will be reported and kept within the site teams documentation system	Site Manager
Daily pre-start checks to be conducted for each activity, where land contamination procedures and control methods are to be outlined where applicable	Site Manager
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director

13.5 Waste Minimisation & Management

Targets	
A target of 75% of demolition and construction waste to be reused or recycled	
A culture of waste minimisation is established whereby conscious efforts are made to reduce waste in all aspects of activities.	
There will be no incidents arising from incorrectly stored / positioned waste	
No complaints related to construction waste affecting nearby residences or premises during construction	
Controls	Responsibility
Licensed waste contractors will be used to remove waste on site	Waste Contractors
All waste will be disposed of at a licensed facility holding an environment protection licence or complies with EPA-approved conditions and requirements	Site Manager
The NSW EPA Waste Classification Guidelines will be used to classify waste prior to disposal	Site Manager / Subcontractor
An adequate number of skip bins will be provided on site to be used to hold all waste generated	Site Manager
Waste disposal permits and figures on the amount of waste that has been removed from site will be retained	Site Manager / Subcontractor
The following recycling services are to be provided: Paper, concrete, steel, cardboard and timber	Site Manager
Waste minimisation is to be accounted for during the design phase of materials and equipment where applicable	Project Manager / Site Manager
Monitoring	Responsibility
Skips are to be monitored by the Site Manager or Site Engineer each day to avoid overfilling	Site Manager / Site Engineer
Daily pre-start checks to be conducted for each activity, where land contamination procedures and control methods are to be outlined where applicable	Site Manager
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director
Exact quantities will be specified during procurement to avoid unused (waste) materials and excess packaging.	Site Manager / Site Engineer

13.6 Heritage Management

Targets	
No incidents of disturbance or damage to known existing heritage sites or items	
Unknown or undocumented heritage sites are not knowingly damaged or disturbed	
Identify and protect any new artefacts or heritage sites before any harm can take place. Any relics found on site will be kept safe or distributed to licensed facilities	
Controls	Responsibility
Awareness training on the need for the preservation of artefacts and items of heritage value to be provided during the site induction.	Site Manager
Location of currently identified archaeological and heritage items are to be noted in construction plans	Architect
Exclusion fencing will be provided around the perimeter of any identified heritage or archaeological items	Site Manager
Excavations on or around known heritage and archaeological sites are to be monitored as required by the ethnographic / anthropologist consultant	Site Manager
Should any items be discovered that are suspected of being of heritage or archaeological significance, work in the specific area will stop and the HSEQ Director is to be notified immediately. The HSEQ Director will then contact the appropriate authority (Police, Department of Indigenous Affairs etc.) who will inspect the area and provide notification of when works can recommence	Subcontractor / Site Manager / HSEQ Director
Monitoring	Responsibility
Findings are to be documented and reported to all relevant authorities and stored within the site documentation system	Site Manager
Daily pre-start checks to be conducted for each activity, where heritage management and control methods are to be outlined where applicable	Site Manager
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director

13.7 Flora and Fauna Management

Targets	
No death or injury to any fauna	
No destruction of any flora, particularly that which is preserved	
No damage to trees marked as protected on the project.	
Controls	Responsibility
Fencing and signage is to be installed surrounding vegetation which has been identified for retention within 5m of activity proximity	Site Manager
Vegetation removal is to be kept to a minimum by clearly fencing off vegetation zones. Where it is required, a clearing permit must be approved by the relevant authority prior to work commencement.	Subcontractor
All trenches / excavations will be inspected each morning. Where flora and / or fauna are discovered, personnel are to cease work and notify the Site Manager	Subcontractor
If any previously unidentified flora or fauna is discovered on-site, personnel are required to notify the Site Manager. Subcontractors must make conscious efforts to minimise harm and mortality to those animals	Subcontractor
Monitor disturbed areas for growing weeds and undertake necessary control measures as seen as applicable. If required, workers are to fertilise, water and weed rehabilitated areas.	Site Manager / Subcontractor
Plant and equipment brought to and from site must be cleaned of mud and harmful materials, that may disturb vegetation or harbour weed growth	Subcontractor
Personnel are not permitted to hunt, fish, feed, capture or otherwise disturb flora and fauna when in or around site	Site Manager / Subcontractor
Only qualified tree removal contractors will be used with approval from the client and authorities	Subcontractor

Monitoring	Responsibility
Pre-construction ecological surveys will be conducted to be used as reference to monitor effectiveness of controls listed above	Environmental Consultant
Daily pre-start checks to be conducted for each activity, where flora and fauna procedures and control methods are to be outlined where applicable	Site Manager
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director

13.8 Chemicals & Hazardous Materials Management

Targets	
No accidental release of chemicals, as listed under the Environmental Protection Regulations 2004, during construction	
No incidents involving chemical spills or unprecedented damage to the surrounding environment	
All chemicals and hazardous materials to be registered and stored securely	
Controls	Responsibility
A Safety Data Sheet (SDS) and Chemical / Hazardous Materials Risk Assessment are to be submitted for all substance brought on site. A register of chemicals and hazardous materials is also conducted and maintained for project duration	Site Manager
All chemicals and hazardous materials not being used are to be stored in a securely bunded area with appropriate signage.	Site Manager
Storage sites for chemicals are to be located at a minimum of 20 metres away from facilities, drainage lines and areas prone to flooding	Site Manager
When unloading fuel, chemicals or other substances, the operator or supervisor must be present at all times	Subcontractor
Spill kits or absorbent material for spills are to be located near storage bunds	Site Manager
Chemical handling is only permitted in a designated area set by the Site Manager, where potential spills or contaminated run-off cannot reach stormwater	Site Manager / Subcontractor
Monitoring	Responsibility
SDS and the Chemical / Hazardous Materials Register are always conducted on site and accessible by personnel	Site Manager
Incidents of spills and other unprecedented chemical releases are recorded on Procore "Incidents" tab to be closed out	Site Manager
Storage areas are inspected by the Site Manager or Foreman on a weekly basis to ensure materials are correctly stored and not missing	Site Manager / Foreman
Daily pre-start checks to be conducted for each activity, where chemicals and hazardous materials handling methods are to be outlined where applicable	Site Manager
Monthly site walks to be conducted by HSEQ Director to monitor objectives and targets	HSEQ Director

13.9 Traffic Management Plan

Please refer to separate Traffic Management Plan document.

14.0 Environmental Risk Assessment

An environmental risk assessment is to be completed at a project level during site establish to identify and mitigate potential hazards that may impact the broader environment. A

master risk assessment is to be used as a template and made project specific by both the site manager and project manager to account for relevant risks and procedures that must be adopted.

The master environmental risk assessment is attached as **Annexure C**.

Appendix A Environmental Policy

ENVIRONMENTAL MANAGEMENT POLICY

This policy outlines the company's actions and views on environmental issues.

This policy applies to all employees, contractors and managers working for Belmadar.

Responsibilities:

In all organisational undertakings Belmadar is committed to:

- a) Complying with all environmental legislative requirements,
- b) Prevent or minimise air, water, land pollution from occurring as a direct result of any of Belmadar's activities,
- c) Minimise Greenhouse Gas Emissions,
- d) Minimise water usage,
- e) Minimise non-renewable energy consumption,
- f) Utilised current environmental best practise methodologies,
- g) Recycle, reduce and re-use wherever possible,
- h) Train and educate all staff to utilise and adopt environmentally friendly methods in all aspects of our work,
- i) Promote environmentally friendly methods as Belmadar's preferred method of performing business,
- j) Minimise noise pollution,
- k) Minimise dust and sediment pollution,
- l) Protect wildlife and their habitats,
- m) Dispose of wastes appropriately,
- n) Protect Aboriginal, European, and natural heritage,
- o) Use triple bottom line reporting to balance business considerations of economic, social and environmental factors in the implementation of works,
- p) Support programs that encourage or create social change with respect to business and public attitudes to sustainable development, and
- q) Select sub-contractors and suppliers who support Belmadar's aims and objectives within our environmental philosophy.

Belmadar endeavours to continually improve environmental performance and attitudes so as to achieve current best practices as a minimum standard.

Belmadar meets these basic requires through complying with the maintenance of our internationally recognised accreditation AS/NZS 14001:2004.

Through our continual improvement processes we will endeavour to perform over and above the minimum standards as set out in AS/NZS 14001:2004.



Alfredo Domenico Marrocco
Managing Director, Belmadar Pty Ltd
1st of November 2020



Brett Drew
Health, Safety, Environmental & Quality Director
1st of November 2020

Appendix B

Legal requirements

Legislation	Summary	Relevance
Clause B33 Construction Environmental Management Plan (CEMP) of the Development Consent issued on 19th February 2018.	Provide a copy of the CEMP prepared by an appropriately qualified person incorporating the requirements of i) – xiv) of this condition. The introduction of the report should certify compliance with this condition of the SSDA.	
B36 Construction Noise & Vibration Management Plan (CNVMP) of the Development Consent issued on 19th February 2018.	Provide a copy of the CNVMP prepared by an appropriately qualified person incorporating the requirements of i) – x) of this condition. The introduction of the report should certify compliance with this condition of the SSDA.	
Contaminated Land Management Act 1997	The general object of this Act is to establish a process for investigating and (where appropriate) remediating land that the EPA considers to be contaminated significantly enough to require regulation	
Contaminated Land Management Regulation 2008	The regulation allows sites to be cleaned up more efficiently while reinforcing the 'polluter pays' principle. Other regulations include increased fines for non-compliance and classification for significantly contaminated land	
Environmental Planning and Assessment Act 1979	Objectives of the act revolve around promoting a better environment through the proper management, development and conservation of natural resources as well as facilitating ecologically sustainable development	
Environmental Planning and Assessment Regulation 2000	The regulation contains key operational provisions for the NSW planning system, especially those relating to requirements and procedures for planning proposals as well as procedures for making and amending development control plans	
State Environmental Planning Policy (Infrastructure) 2007	The aim of this Policy is to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency as well as allowing for the efficient development / redevelopment of government owned land	
Environmental Trust Act 1998 (no environmental obligations for non-regulatory organisations)	The objective of the act is to encourage and support restoration and rehabilitation projects to prevent or reduce pollution, the waste-stream or environmental degradation of any kind in New South Wales	
Environmentally Hazardous Chemicals Act 1985 Environmentally Hazardous Chemicals Regulation 2017	An Act to provide control of the effect on the environment of chemicals and chemical wastes. It established a formal process to assess chemicals and, where necessary, to impose controls on chemicals	
Local Government Act 1993	The act defines the purposes and functions of local government as well as providing the legal	


Local Government (General) Regulation 2005	framework for establishing and administering Councils. The regulation ensured councils and their elected bodies remained fully accountable to the public.	
Poisons and Therapeutic Goods Act 1966	The object of this act is to prescribe requirements in respect of certain substances and goods that may be used for a variety of purposes. It imposes limitations on the use of many potent medicines, drugs and poisons by restricting their distribution, prescription and/or administration to appropriately qualified and authorised persons	
Protection of the Environment Administration Act 1991	This act constitutes the Environment Protection Authority and makes provision with respect to its general responsibilities and management. Other objects include providing integrated administration for environment protection, and the requirement of Authority to perform tasks in relation to the quality of the environment and environmental audits	
Protection of the Environment Legislation Amendment Act 2011 Protection of the Environment Administration Regulation 2012	The act aimed to improve the way pollution incidents are reported and managed by outlining notification requirements, providing pollution incident management plans and publishing monitoring data. The Regulation makes provision for members of the board of the Environment Protection Authority to make disclosures of interests.	
Protection of the Environment Operations Act 1997	This act aims to protect, restore and enhance the quality of the environment in New South Wales, by maintaining ecologically sustainable development as well as to reduce risks to human health and degradation of the environment by the use of mechanisms	
Protection of the Environment Operations (Clean Air) Regulation 2010	This act imposes certain requirements and standards for the industry's air impurity emissions in areas such as controlled burning, anti-pollution devices and solid fuel heaters. It also outlines requirements on the control, storage, and transport of volatile organic liquids	
Protection of the Environment Operations (General) Regulation 2009	This Regulation outlines the administration of environment protection licences, defines water pollution, prescribes further requirements in respect of pollution incident response management plans and outlines penalty notices for certain offences	
Protection of the Environment Operations (Noise Control) Regulation 2008	This regulation provides regulations for noise emissions from vehicles, outlines labelling of certain noise emitting articles such as chainsaws, air conditioners or pavement breakers and	

	provides for the inspection and testing of certain equipment	
Protection of the Environment Operations (Waste) Regulation 2005	This Regulation prescribes the transport of waste to licenced facilities, outlines reporting requirements relating to asbestos waste as well as prohibiting the re-use and recycling of asbestos waste, and makes it an offence to cause or permit the application of residue waste to land that is used for the purpose of growing vegetation	
Protection of the Environment Operations Amendment (Miscellaneous) Regulation 2011	This act regulates a variety of legislative changes including when an environmental protection license is required, amendments to other environmental protection regulations for specific activities and clearly defines EPA responsibilities for certain tasks.	
Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012	The object of this regulation is to specify additional matters relating to pollution incident response management plans that are required to be prepared by the holders of environment protection. In particular, the regulation specifies the additional information that is required to be included in a plan, the manner in which it is to be made available and the occasions on which it is to be tested	
Public Health Act 1991	This act encompasses the maintenance of proper standards of health for the public. It aims to protect and promote public health, control the risk to public health and promote the control of infectious diseases	
Soil Conservation Act 1938	This act makes provision for the conservation of soil resources, farm water resources and for the mitigation of erosion. It acts to amend the Crown Lands Consolidation Act of 1913.	
Sydney Water Act 1994	An Act to establish a State-owned corporation in relation to the supply of water, the provision of sewerage and stormwater drainage systems as well as the disposal of waste water in Sydney	
Sydney Water Catchment Management Regulation 2008	The regulation outlines guidelines for conduct on land in a special area or a controlled area by the creation of a number of offences including the taking of water, pollution, entering certain land and other penalties for non-compliance	
Sydney Water Regulation 2006	This regulation specifies the performance of plumbing and drainage work, including the requirement for a permit to do plumbing or drainage work. It also describes the imposition of restrictions on the use of water in Sydney Water Corporation's area of operations	
Waste Avoidance and Resource Recovery Act 2001	This act aims to encourage the most efficient use of resources and to reduce environmental harm in	

	accordance with the principles of ecologically sustainable development. Other objectives include ensuring the efficient funding of waste and resource management planning, programs and service delivery, and to achieve these on a state-wide basis	
Waste Recycling and Processing Corporation Act 2001	This act aims to protect the environment by conducting its operations in compliance with the principles of ecologically sustainable development. It also aims to provide and manage efficient, safe and reliable waste facilities and to minimise any adverse health and environmental impacts of waste management activities and services	
Water Act 1912 Water Management Act 2000	This act aims to provide for the sustainable and integrated management of the water sources of the state for the benefit of both present and future generations through ecologically sustainable development. Water act licenses permit holders to use water from rivers, lakes, and aquifers in NSW.	

Appendix C

Environmental Risk Assessment

Form No: H1.3.2 Environmental Risk Assessment Register (08/03/2021)										
Environmental Risk Assessment Register										
 COMPLEX MADE EASY										
Doc. No.: H1.3.2 Environmental Risk Register (08/03/2021)										
Rev.: 0 8/03/2021										
Project No.: C21006			Prepared By: Brett Drew				Site Manager: Brett Drew			
Project Description: Building CC3 Heritage Refurbishment						Project Manager: Brett Drew				
Scope of Works: Refurbishment										
No.	Aspect of the Project	Environmental Hazards	Current Risk Assessment			Hierarchy of Control	Proposed Treatment (Prevention/Mitigation Action)	RA after proposed treatment		
			Likelihood	Consequence	Risk Rating			Likelihood	Consequence	Risk Rating
1 Noise and Vibration										
1.1	Noise from general construction activities in residential areas	Disturbance of residents resulting in noise complaints	Likely	Moderate	9 Medium	6 PPE	Ensure equipment has noise minimisation technology where applicable	Rare	Moderate	14 Low
1.2	Noise from general construction activities in residential areas	Disturbance of residents resulting in noise complaints	Likely	Moderate	9 Medium	5 Admin	Consult with community in relation to construction activities	Rare	Moderate	14 Low
1.3	Noise from general construction activities in residential areas	Disturbance of residents resulting in noise complaints	Likely	Moderate	9 Medium	5 Admin	Establish noise monitoring targets and monitor for compliance	Rare	Moderate	14 Low
2.0 Dust / Air Quality										
2.1	General construction works such as demolition, excavation piling	Generation of dust leading to pollution and complaints from residents	Likely	Moderate	9 Medium	5 Admin	Toolbox talks to discuss air quality and dust management	Possible	Moderate	12 Moderate
2.2	General construction works such as demolition, excavation piling	Generation of dust leading to pollution and complaints from residents	Likely	Moderate	9 Medium	4 Engineer	Mitigate dust through equipment such as water carts and water	Possible	Moderate	12 Moderate
2.3	General construction works such as demolition, excavation piling	Generation of dust leading to pollution and complaints from residents	Likely	Moderate	9 Medium	4 Engineer	Physical barriers to be erected to prevent wind or activity from generating dust emissions	Possible	Moderate	12 Moderate
2.4	Plant and equipment exhaust	Air pollution	Likely	Moderate	9 Medium	5 Admin	Conduct pre-start checks and servicing checks with up to date register	Possible	Moderate	12 Moderate
3.0 Water Quality / Erosion & Sediment Control										
3.1	Sediment runoff from construction works	Degradation of existing waterways / water pollution	Likely	Major	5 High	4 Engineer	Use sediment bases and other equipment for control measures	Possible	Major	8 Medium
3.2	Sediment runoff from construction works	Degradation of existing waterways / water pollution	Likely	Moderate	9 Medium	5 Admin	Toolbox talks to discuss water quality and erosion control methods / competency training to take place if necessary	Possible	Moderate	12 Moderate
3.3	Vegetation and topsoil	Weed and seed dispersion from wind or water	Likely	Moderate	9 Medium	5 Admin	Designated vegetation stockpiling areas away from protected vegetation	Possible	Moderate	12 Moderate
3.4	Discharging water	Pollutant water entering stormwater system	Likely	Moderate	9 Medium	5 Admin	Dewatering permits to be completed prior to discharge to ensure water quality is maintained	Possible	Moderate	12 Moderate
3.5	Discharging water	Pollutant water entering stormwater system	Likely	Moderate	9 Medium	4 Engineer	Toolbox talks to discuss water discharge procedures / competency training to take place if necessary	Possible	Moderate	12 Moderate

Form No: H1.3.2 Environmental Risk Assessment Register (08/03/2021)

Environmental Risk Assessment Register

Doc. No.: H1.3.2 Environmental Risk Register (08/03/2021)
Rev.: 0 8/03/2021

 **belmadar**
COMPLEX MADE EASY

Project No.:	C21006	Prepared By:	Brett Drew			Site Manager:	Brett Drew			
Project Description:	Building CC3 Heritage Refurbishment					Project Manager:	Brett Drew			
Scope of Works:	Refurbishment									
No.	Aspect of the Project	Environmental Hazards	Current Risk Assessment			Hierarchy of Control	Proposed Treatment (Prevention/Mitigation Action)	RA after proposed treatment		
			Likelihood	Consequence	Risk Rating			Likelihood	Consequence	Risk Rating
4.0 Land Contamination										
4.1	Contaminated / untreated materials	Pollutant materials entering stormwater system / Damage to ecosystems	Likely	Moderate	9 Medium	5 Admin	Develop and apply contaminated land or materials management procedures	Possible	Moderate	12 Moderate
4.2	Contaminated / untreated materials	Pollutant materials entering stormwater system / Damage to ecosystems	Likely	Moderate	9 Medium	5 Admin	Toolbox talks to discuss contaminated land procedures / competency training to take place if necessary	Possible	Moderate	12 Moderate
4.3	Discovery of unexpected contaminated land	Release of odours into atmosphere / spread of contaminated materials	Possible	Major	8 Medium	5 Admin	Stop all works and commence professional investigation before recommencing any activities	Rare	Major	11 Moderate
4.4	Asbestos	Spread of asbestos into uncontaminated areas	Possible	Major	8 Medium	5 Admin	Develop and apply asbestos management procedures	Rare	Major	11 Moderate
5.0 Waste Minimisation / Management										
5.1	Waste disposal	Incorrect disposal causing environmental contamination / pollution	Possible	Major	8 Medium	5 Admin	Facilities to be established on site for recycling and waste storage	Rare	Major	11 Moderate
5.2	Waste disposal	Incorrect disposal causing environmental contamination / pollution	Possible	Major	8 Medium	5 Admin	All off site material to be tested / classified by competent personnel before disposal	Rare	Major	11 Moderate
5.3	Waste disposal	Incorrect disposal causing environmental contamination / pollution	Possible	Major	8 Medium	5 Admin	Maintain waste records	Rare	Major	11 Moderate
5.4	Concrete Washout	Sediment / water pollution of stormwater systems	Likely	Major	5 High	5 Admin	Concrete washout areas to be designated by site manager prior to works commencing	Rare	Major	11 Moderate
6.0 Heritage Management										
6.1	Discovery of unexpected heritage items	Damage to heritage items	Possible	moderate	12 Moderate	4 Engineer	Toolbox talks to discuss possibility of heritage item discovery and management procedures	Rare	moderate	14 Low
6.2	Discovery of unexpected heritage items	Damage to heritage items	Possible	moderate	12 Moderate	5 Admin	Known areas with heritage items / land to be marked on site drawings and considered when undergoing all works. A safe distance is to be applied	Rare	moderate	14 Low
6.3	Discovery of unexpected heritage items	Damage to heritage items	Possible	moderate	12 Moderate	4 Engineer	Stop all works and commence professional investigation before recommencing any activities	Rare	moderate	14 Low
7.0 Flora and Fauna Management										
7.1	Vegetation removal	Removing or damaging threatened species	Possible	Major	8 Medium	5 Admin	Clear markings to be put in place for protected areas / species both on site and on drawings	Rare	major	11 Moderate
7.2	Vegetation removal	Removing or damaging threatened species	Possible	Major	8 Medium	5 Admin	Toolbox talks to discuss existing clearance zones and necessary protection measures for avoiding destruction of flora and fauna	Rare	major	11 Moderate
7.3	Vegetation removal	Removing or damaging threatened species	Possible	Major	8 Medium	5 Admin	Erosion and sediment control plans to be in place prior to works with vegetation commencing	Rare	major	11 Moderate
8.0 Chemicals / Hazardous Materials Management										
8.1	Storage of chemicals and hazardous materials	Spills into the environment	Likely	Major	5 High	5 Admin	Storage areas to be designated in a location away from stormwater systems or egress paths.	Possible	Major	8 Medium
8.2	Storage of chemicals and hazardous materials	Spills into the environment	Likely	Major	5 High	5 Admin	SDS to be approved for all chemicals on site with a register to be maintained	Possible	Major	8 Medium
8.3	Storage of chemicals and hazardous materials	Spills into the environment	Likely	Major	5 High	4 Engineer	Spill kits to be located in an accessible location on site, with site personnel trained in their use	Possible	Major	8 Medium
8.4	Runoff	Contaminated runoff entering stormwater systems	Likely	Major	5 High	4 Engineer	Toolbox talks to discuss chemicals and hazardous materials storage	Possible	Major	8 Medium
8.5	Runoff	Contaminated runoff entering stormwater systems	Likely	Major	5 High	4 Engineer	All runoff material to be tested / classified by competent personnel before disposal	Possible	Major	8 Medium

