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PSP_C Attachment 8.1

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP)

FOR

Queanbeyan-Palerang Regional Council (QPRC)

Burra Road : Reconstruction from Little Burra Road to London Bridge Road

Document Issues, Revisions and Authorisations

PLAN ISSUE	PAGE(S) REVISED	PAGE(S) REV. No.	BRIEF REASON FOR REVISION	DATE	PREPARED FOR	AUTHORISED BY
A	All	0	Original Issue Total of 46 Pages Plus, Appendices as Listed in Point 8.2	06/06/18	IES for Barry Osmond Program Co-ord., Transport Construction	Nathan Cooke Service Manager Transport & Utilities
A	4 & 45 2	1 1	Points 1.1 and 8.1: Reference to 'Minor Works' Contract added This page duly revised. Plan remains Total of 46 Pages Plus, Appendices as Listed in Point 8.2	14/06/18	IES for Barry Osmond Program Co-ord., Transport Construction	Nathan Cooke Service Manager Transport & Utilities
B	All		Plan template fully reviewed to integrate to QPRC management systems and align RMCC templates inclusive of PSP-C template and Att. 8.1	30/06/20	Barry Osmond Program Co-ord., Transport Construction	Nathan Cooke Service Manager Transport & Utilities

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Section 1. – Introduction

1.1 The Project and the Purpose, Objective and Content of CEMP

This Construction Environmental Management Plan (CEMP) and associated "work specific" environmental protection documentation [erosion and sedimentation plans (E&SCP's) and Environmental Line Work Plans (if developed)] (described in CEMP Section 6) are prepared for the construction of approach roads and related works ('the Works') associated with proposed Burra Road Reconstruction from Little Burra Road to London Bridge Road.

The Works are located between Burra Road Chainage 1520.00 to chainage 3300.00, making a total length of 1780 metres. The target widths of the road formation along Burra Road are 2 x 3.25 metre lane widths, and 1.0 metres sealed shoulders, which making altogether 8.5 metres nominal bitumen seal width. Also when there is a SO kerb on one side along the Burra Road, QPRC going to make 9.5 metres of nominal bitumen seal width by 2 x 3.25 metres lane widths and 1.5 metres sealed shoulders.

This CEMP has been prepared as portion of and is controlled under attachment 8.1 of the Project Specific Plan for Construction (PSP-C) for the Works.

The Works generally involves:-

- Survey and design of the existing alignment with the possibility of some realignment
- Clearing and grubbing of the new construction footprint
- Earthworks to shape batters and form the road
- Construction of drainage requirements to protect the road from flooding events
- Construction of the road pavement using a flexible gravel pavement
- Sealing of the road surface for waterproofing
- Installation of road furniture for road safety requirements.

This CEMP and associated documentation has been prepared in consideration of RMS' QA Specification G36: Environmental Protection, G38: Soil and Water Management, NSW Government Environmental Management System Guidelines (3rd Edition; August 2013) , Little Burra Road to London Bridge Road REF prepared by Eco Logical Australia Pty Ltd and Statutory requirements.

Section 1. – Introduction (Continued) …

1.1 The Project and the Purpose, Objective and Content of CEMP (Cont) …

The 'overall' objective of this CEMP is to provide formal planning and instruction to protect the environment during the Works, and in support of QPRC's Health Safety Environment and Quality Policy. Refer to linked Policy under CEMP Point 3.4 below.

"Work specific" environmental protection documentation [erosion and sedimentation plans (E&SCP's) and Environmental Line Work Plans (if developed)] (described in CEMP Section 6) are progressively developed, reviewed, as necessary amended and maintained under **various PSP-C attachments.** "Work specific" environmental protection documentation is prepared as "stand alone" instructional documents and detail the environmental safeguards and protection measures identified as necessary for particular sections of the Works, as the Works progresses. This CEMP covers:-

- restrictions to working hours;
- likely potential environmental aspects and impacts of the Works;
- an overview of applicable legislative and statutory obligations;
- QPRC's environmental commitment plus associated management personnel's roles and responsibilities;
- environmental safeguards to be implemented in order to mitigate likely potential environmental aspects and impacts;
- monitoring procedures to be followed to verify that the provisions of this CEMP are being implemented;
- processes/ procedures to be implemented in the event the monitoring procedures or other review procedures reveal non-conformances; and
- incident response processes/ procedures to control and manage an incident that results in an actual or a potential environmental impact.

1.2 Working Hours

Working hours and working days are restricted to:-

- 6.30am through 5.30pm, Monday to Friday; and
- 6.30am through 2pm, Saturdays

Only the following work is permitted outside these days and hours …

- Work approved by the Program Co-ordinator Transport Construction; and / or
- The delivery of materials which is required outside hours and as requested by police or other authorities for safety reasons; and / or
- Emergency work to avoid the loss of life and / or property and / or to prevent environmental harm.

Section 1. – Introduction (Continued) …

1.3 Environmental Aspects and Impacts and Assessment

Eco Logical Australia' Document titled "Little Burra Road to London Bridge Road REF" (REF), issued in 09 October 2019, includes consideration of the Works, and is included under **PSP-C Tab 11**.

Safeguards and management measures identified in the REF as relevant to the Works, have been included in CEMP Section 6, as further described in Section 6 itself.

Section 1. – Introduction (Continued) …

1.3 Environmental Aspects and Impacts and Assessment (Continued) …

With due consideration to the REF, the following table summarises the expected aspects and potential impacts for the Works.

Factor / Potential Impact Topic …	Significant	Moderate	Minor	Negligible
Terrestrial Biodiversity		✓		
Aquatic Biodiversity		✓		
Aboriginal Heritage				✓
Non-Aboriginal Heritage				✓
Geology and Soils		✓		
Hydrology and Water Quality		✓		
Air Quality		✓		
Noise and Vibration		✓		
Traffic and Safety		✓		
Visual Amenity and Landscape			✓	
Socio-economic		✓		
Energy and Climate Change				✓
Waste Management			✓	
Cumulative Impacts			✓	

As introduced in CEMP Points 1.1 and 1.2 above, Environmental Protection processes/Procedures have been developed for each of the above expected aspects and potential impacts classified as ‘significant’ and ‘moderate’. Refer to CEMP Section 6

Section 2. – Legislation and Statutory Obligations

2.1 Legislation / Statutes and Environmental Penalties

As covered in various sections, the REF was prepared with consideration to and includes appropriate content covering the following applicable and related legislation.

'Overall' Planning and Assessment ...
- *Environmental Planning and Assessment Act, 1979* (NSW)
  - … State Environmental Planning Policy (Infrastructure) 2007

Heritage and Archaeology ...
- *National Parks and Wildlife Act, 1974* (NSW)
- *Heritage Act, 1977* (NSW)

Water Quality ...
- *Water Management Act, 2000* (NSW)
  - … State Enviro Planning Policy (Sydney Drinking Water Catchment) 2011

Waste …
- *Waste Avoidance & Resource Recovery Act 2001* (NSW) (Waste Avoidance / Recovery Act)

Flora and Fauna ...
- *Native Vegetation Act, 2003* (NSW)
- *Fisheries Management Act, 1995* (NSW)
- *Threatened Species Conservation Act, 1995* (NSW)
  - … State Environmental Planning Policy No. 44 – Koala Habitat Protection
- *Noxious Weeds Act, 1993* (NSW)
- *National Parks and Wildlife Act, 1974* (NSW)

Biodiversity ...
- *Environment Protection and Biodiversity Conservation Act, 1999* (Cth)
- *Biodiversity Conservation Act 2016* (NSW)

Amenity ...
- *Roads Act 1993* (NSW)

General ...
- *Protection of the Environment Operations Act, 1997* (NSW) (POEOA)

Section 2. – Legislation and Statutory Obligations (Continued) …

2.1 Legislation / Statutes and Environmental Penalties (Continued) …

QPRC Transport Construction recognises that the following, albeit unlikely, may apply to or become a consequence of environmental aspects and impacts during construction of the Works.

** Note Statutes which were replaced by and incorporated in the Protection of the Environment Operations Act, in late 1999, or by the Water Management Act, in early 2008, have been included as "repealed" Legislation below for ease of reference / information [and given these are still cited (for whatever reasons) in various standard specifications and codes]. **

Ensure all legislation updates are recorded accordingly at time of project:

Pollution - General ...

~~*Environmental Offences and Penalties Act, 1989* (NSW)~~ ... ** Repealed **
~~*Pollution Control Act, 1970* (NSW)~~ ... ** Repealed **
Protection of the Environment Operations Act, 1997 (NSW) (POEOA)
Environmentally Hazardous Chemicals Act, 1985 (NSW)

Water Quality ...

~~*Clean Waters Act, 1970* (NSW)~~ ... ** Repealed **
~~*Rivers and Foreshores Improvement Act, 1948* (NSW)~~ ... ** Repealed **
Water Management Act, 2000 (NSW)
Water Act, 1912 (NSW)

Air Quality ...

~~*Clean Air Act, 1961* (NSW)~~ ... ** Repealed **

Noise ...

~~*Noise Control Act, 1975* (NSW)~~ ... ** Repealed **

Heritage and Archaeology ...

National Parks and Wildlife Act, 1974 (NSW)
plus its Amendment Acts, 2001 and 2010
Heritage Act, 1977 (NSW)

Waste ...

~~*Waste Minimisation and Management Act, 1995* (NSW)~~ ... ** Repealed **
Waste Avoidance and Resource Recovery Act 2001 (NSW)

Community and Public Amenity ...

Roads Act 1993 (NSW)

Flora and Fauna ...

Fisheries Management Act, 1995 (NSW)
Threatened Species Conservation Act, 1995 (NSW)
Native Vegetation Act, 2003 (NSW) and its Regulation, 2013

Section 2. – Legislation and Statutory Obligations (Continued) …

2.1 Legislation / Statutes and Environmental Penalties (Continued) …

Environmental Penalties ...

Environmental offences under the *Protection of the Environment Operations Act, 1997* (NSW) (POEOA) are classed into three tiers; Tier 1, 2 or 3

Tier 1 offences as the most serious offences. These are the wilful or negligent disposal of waste causing or likely to cause harm to the environment (POEOA section 115), wilfully or negligently causing a substance to leak, spill or otherwise escape in a manner that harms or is likely to harm the environment (section 116), and the wilful or negligent emission of an ozone-depleting substance in breach of the Ozone Protection Regulations in a manner that harms or is likely to harm the environment (section 117). Tier 1 offences can attract penalties of up to $5 million and seven (7) years in gaol.

Tier 2 offences are set out according to the 'medium' involved. Water pollution (without an appropriate licence) is prohibited under POEOA section 120. Potential air and noise pollution offences are similarly controlled. Waste offences include littering, unlawful transporting of waste and permitting land to be used unlawfully as a waste facility. Land pollution (without an appropriate licence) is prohibited under POEOA section 142A. The maximum penalties for Tier 2 offences are $2 million (in the case of a Corporation) and $500,000 (in the case of an individual). Ongoing daily penalties apply to continuing offences.

Tier 3 offences are dealt with by penalty notices (sometimes known as 'on-the-spot fines' or 'penalty infringement notices'). These notices impose a fine that can be paid or can be defended in court. The maximum possible penalty that a penalty notice can impose may not exceed the maximum penalty that can be imposed by a court for the offence. The Protection of the Environment Operations (Penalty Notices) Regulation 2004 (NSW) lists the Tier 2 offences that can be dealt with by penalty notice.

Other Legislation including (but not limited to) the *National Parks and Wildlife Act, 1974* (NSW) and the *Heritage Act, 1977* (NSW) prescribe significant penalties for environmental offences.

Section 2. – Legislation and Statutory Obligations (Continued) …

2.2 Approvals, Permits and Licences

Given the expected nature of the Works, including extent and location of construction activities, it is not envisaged that any planning related permits, licences or formal approvals (other than those already obtained by RMS during the planning phase of the Works) will be required from other QPRC departments, nor from the NSW Environmental Protection Authority (EPA), nor from the NSW Department of Primary Industries (DPI) "Water" (formerly DLWC, then DNR, then DoW, then NSW Office of Water).

The expected impacts of the Works do not include matters for which any (further) planning representations need be made to the EPA, the Department of Planning (Heritage Branch), NSW Office of Environment and Heritage (OEH - NPWS Division), or to NSW WorkCover.

Accordingly QPRC Transport Construction is only responsible for obtaining the following (further) approvals, permits and / or licences arising as a direct result of construction activities, and during the construction phase of the Works:-

- new waste disposal sites approval(s), as and if required; and
- Road Occupancy Licence(s) and Speed Zone Authorisations, as required.

2.3 Archaeological and Heritage Findings

While not foreshadowed in the REF, if Aboriginal or suspected Aboriginal objects are discovered during the Works, activities in the affected area are to cease immediately and OEH (NPWS) notified under section 89A of the *National Parks and Wildlife Act, 1974* (NSW).

Similarly, if a non-Aboriginal relic or heritage item or suspected relic or heritage item is discovered the NSW Heritage Council is to be notified under section 146 of the *Heritage Act, 1977* (NSW)

Section 3. – Organisation, Responsibilities, Accountabilities & Communication

3.1 Organisation

QPRC's organisation structure and various relevant contact details are included in the PSP-C Attachment 1.

3.2 Roles and Responsibilities

QPRC recognises Statutory requirements / obligations to define the following "work specific" environmental roles and responsibilities for all personnel.

Abbreviations ...

PC / CE/ESR = Program Co-ordinator/ Construction Engineer and Environmental Site Rep.
TL = Team Leader(s)
EMR = Environmental Management Representative (if required)
DL = "Direct" Labour

Responsible for ...	PC / CE/ESR	TL	EMR	DL
Preparation of and revisions (as necessary) to this Environmental Management Plan and related planning documentation in consultation with and as instructed by the ESR.	✓or		✓	
Liaison with all relevant authorities on environmental matters.	✓			
Managing compliance with Environmental legislation and "work specific" environmental requirements.	✓	✓		
Maintaining a register of all environmental management documents for the Works.	✓			
Hold and / or make available copies of relevant "Site specific" environmental documentation.		✓		
Initial inspection(s) and identifying of any further potential 'location specific' environmental impacts associated with the Works.	✓	✓		
'Overall' responsibility for the establishment, management, monitoring and maintenance of erosion and sediment controls within the Site.	✓			
'Day-to-day' responsibility for the establishment, management, monitoring and maintenance of erosion and sediment controls within the Site.		✓		✓
Ongoing inspection(s) and identification of 'location specific' environmental aspects of the Works.		✓		✓
Documenting environmental protection measures to be taken and development of "work specific" procedures and other instruction.	✓or		✓	
Identifying environmental training needs of management, team leaders and all site personnel.	✓	✓		
'Overall' responsibility for facilitating environmental induction and environmental 'content' in toolbox talks for all site personnel.	✓			

Section 3. – Organisation, Responsibilities, Accountabilities & Communication (Cont) …

3.2 Roles and Responsibilities (Continued) …

Abbreviations ...

PC / CE/ ESR = Program Co-ordinator/ Construction Engineer and Environmental Site Rep.
TL = Team Leader(s)
EMR = Environmental Management Representative (if required)
DL = "Direct" Labour

Responsible for ...	**PC / CE/ ESR**	**TL**	**EMR**	**DL**
Delivery of environmental training / induction.	✓or	✓or	✓	
Daily planning, establishment and monitoring of "location specific" environmental protection measures.		✓		✓
OVERALL responsibility for incident management, including contact outside normal working hours.	✓			
Responsibility for incident management, including contact outside normal working hours, IN THE EVENT above is not available.		✓		
Managing environmental incidents and associated emergency procedures.	✓	✓		✓
Authority to stop all or particular work and to use / mobilise QPRC's resources and / or engage external resources (as necessary) to implement all reasonable steps to avoid environmental nonconformities or to mitigate adverse environmental impacts; including environmental emergencies.	✓	✓		
Recording environmental incidents and reporting to relevant parties and authorities.	✓	✓		
Preparation and issue of "internal" NCR's.	✓	✓	or ✓	
'Overall' responsibility for regular inspections and auditing of the works to ensure that environmental safeguards are being followed.	✓			
'Day-to-day' responsibility for Site environmental inspections / completion of associated records to ensure that environmental safeguards are being followed.		✓		
Carrying out, recording and reporting "internal" environmental audits.	✓or		✓	
Identifying where the implemented environmental measures are not meeting the targets set, and identifying areas where improvement can be achieved.	✓			
As and if required, preparing monthly reports outlining the works that have been undertaken and the achievements that have been met, as well as identifying those areas where improvements were made.	✓			

Section 3. – Organisation, Responsibilities, Accountabilities & Communication (Cont) …

3.3 Training of Personnel

To ensure all Site personnel are familiar with this CEMP and the "work specific" documentation and how they apply to them, all personnel will be formally inducted prior to commencing their work. These inductions will be carried out by the Environmental Site Representative (or other Council delegate who has been duly trained) and will include:-

- Familiarisation with each of the Sections of this CEMP, in particular stressing the purpose and objectives of the CEMP, environmental due diligence, duty of care and environmental penalties for associated violations, conditions of applicable environmental licences, permits and approvals (if any), organisation and environmental compliance monitoring, environmental incidents and emergencies and environmental non-conformances (both potential and actual), associated emergency response procedures (including, but not limited to, for unexpected archaeological and / or heritage discoveries), reporting and notification requirements for pollution and other environmental incidents;

- Familiarisation (or re-familiarisation) with each of the Environmental Protection Processes detailed in CEMP Section 6 and accessed via tablet, associated responsibilities, specific circumstances where work is not to proceed until approvals have been obtained, and specific circumstances where work is to cease; and

- Familiarisation with the role, format and 'usual' content of Environmental Line Work Plans (as and when developed – see CEMP Point 6.7 below).

Formal site inductions, plus ongoing monitoring and feedback of personnel performance / compliance is the primary form of training employed. In the event monitoring and feedback identifies particular needs appropriate further training is arranged including, if necessary, formal "external" training of key personnel.

Tool box meetings (held at least fortnightly and on commencing of new or changed activities) are also used to provide a forum to discuss current and upcoming environmental issues and requirements, to serve as 'refresher' training to the formal site inductions, and to provide site personnel with formal environmental instruction (as and when necessary).

Section 3. – Organisation, Responsibilities, Accountabilities & Communication (Cont) …

3.4 Extract from QPRC's HSEQ Policy – The full policy is web-linked from QPRC Approved Policy on the website to the CSMP through the RMCC-Management Plans process linked below:
https://au.promapp.com/qprc/Process/Minimode/Permalink/EoXgEfwmk4TzguHhp8R4hL

Queanbeyan-Palerang Regional Council is committed to providing a safe and healthy work environment for all workers including, councillors, contractors, volunteers and visitors.

HSEQ management systems implemented by QPRC provide the framework for continual improvement throughout all our businesses, products and activities.

External certification of these systems provides a recognised external assessment process through which we can align our business excellence.

Through the implementation of our HSEQ Management Systems QPRC is committed to the following principles:

- The maintenance of a safe environment and safe work places
- Executives and managers commit to active leadership and sound HSEQ governance
- Reducing both human and financial costs of injuries through early intervention and rehabilitation support
- Adopting ecologically sustainable development principles
- Consultation on issues that may affect an individual's health and safety
- Proactively identifying and managing HSEQ risks, and implementing effective controls and systems of work
- Effective management of the processes around land access and statutory approvals
- Reducing our energy, water and natural resources consumption and waste generation
- Providing all necessary supervision, training, instruction, equipment and information to workers and visitors to our workplaces
- Setting and achieving HSEQ corporate key performance indicators (KPIs) and related improvement plans
- Regularly monitor, audit, review and report health, safety, environmental and quality performance against internal objectives and targets for continuous improvement
- Effective communication of our HSEQ management systems
- Seeking and respecting customer feedback and community views
- Maintenance of certification to, AS/NZ 4801 AS/NZS ISO 14001and AS/NZS ISO 9001.

Council's workers, councillors, contractors, volunteers and visitors are responsible and held accountable for carrying out their activities in accordance with the above principles. QPRC staff are required to cooperate and comply with this Policy and supporting documents to undertake a HSEQ risk management approach.

Further, QPRC will encourage the adoption of these principles by organisations working in a close relationship with Council.

Section 3. – Organisation, Responsibilities, Accountabilities & Communication (Cont) …

3.5 Service Providers and Subcontractors

The Program Co-ordinator Transport Construction carries 'overall' responsibility for and QPRC's Team Leader(s) is / are responsible for the day-to-day management of service providers and subcontractors on-Site; including surveillance in accordance with Point 7.3 below.

For the purposes of training / induction, environmental 'performance' and environmental compliance monitoring, service providers and subcontractors (and their personnel) are treated as if they were QPRC personnel and are subject to all of the requirements of this CEMP and the "work specific" documentation. Service providers' and subcontractors' personnel are inducted in accordance with CEMP Point 3.3 above and their 'performance' is monitored in accordance with Point 7.3 below.

Service providers and / or subcontractors found not to comply with environmental protection requirements / instructions (including serious and / or repeated minor breaches) will be instructed to cease work immediately and participate in a full assessment of the non-conformance(s) ... CEMP Section 5 below relates.

In the event a service provider or subcontractor does not fully co-operate with QPRC to address non-conformance(s), and / or continues to breach requirements / instructions, the Program Co-ordinator Transport Construction has the authority to instruct the subcontractor to "show cause" why their engagement should not be terminated and, if necessary, to terminate their engagement. In the instance of serious breach(es) of environmental protection requirements / instructions the Program Co-ordinator Transport Construction has the authority to immediately terminate engagement of the guilty subcontractor.

3.6 Communication and Liaison with and Visits by NSW EPA

The Program Co-ordinator Transport Construction, Construction Engineers and Team Leader(s) (contact numbers under PSP-C Attachment 1) are available to be contacted by the NSW Environment Protection Authority (EPA) on a 24 hour basis and, further to Point 3.2 above, have the authority to take immediate action to cease work and / or to put into effect any pollution control measure, as directed by an authorised NSW EPA officer.

The Program Co-ordinator Transport Construction is to immediately notify appropriate QPRC environmental personnel of any visit to the Site by the NSW EPA and, if required, prepare and submit a report including details of the purpose and outcome of the visit and all actions required in response to the visit.

3.7 Community Complaints Management

Management of community complaints are covered in the CSMP and the RMCC-CSMP Control of Non-conformance process linked below:
https://au.promapp.com/qprc/Process/Minimode/Permalink/EtiIjbmMxLPuTGkmxVULkj
Refer also to CEMP Point 4.2 below.

Section 4. – Incident Management and Emergencies

4.1 Responsibilities

In the event an environmental "incident" occurs the QPRC adopts a policy of immediate control, stabilisation and rectification. The Program Co-ordinator Transport Construction is to be alerted to all environmental "incidents", regardless of the (perceived) seriousness or otherwise.

The Program Co-ordinator Transport Construction carries 'overall' responsibility for classifying, managing and reporting environmental incidents and emergencies, in accordance with RMS' Environmental Incident and Classification Reporting Procedure [September 2017] *('RMS' EI&CR Procedure')*, *in particular as prescribed in RMS' EI&CR Procedure Table 3.1b,* including for contacting the relevant statutory body(ies), RMS' representative(s), utility "owner" (if applicable) and QPRC's own environmental representative(s); as applicable and if necessary out of working hours.

The Construction Engineer assists the Program Co-ordinator Transport Construction in the management of the incident.

The Team Leader(s) are responsible for organising immediate rectification of environmental "incidents".

4.2 Environmental Incident / Emergency 'Matrix'

Without replacing necessary compliance with RMS' Environmental Incident and Classification Reporting Procedure [September 2017] the following process is followed:

https://au.promapp.com/qprc/Process/Minimode/Permalink/F5Q4vBNZtYwysCUCDTm6GZ

The "Contract specific" Incident and Emergency Management Plans include appropriate reference to and a copy of RMS' EI&CR Procedure Table 3.1b, plus spill management measures in accordance with RMS' Code of Practice for Water Management (RTA, 1999) and relevant EPA guidelines

4.3 'Serious' Environmental Incidents and Notification

The Program Co-ordinator Transport Construction is responsible for immediately reporting of 'serious' environmental incidents to the relevant authority. Relevant emergency contact numbers are included under **PSP-C Attachment 1**

Further to CEMP Point 2.1 above and RMS' EI&CR Procedure Table 3.1b (included in the "Contract specific" Incident and Emergency Management Plans), under Part 5.7 of the POEOA there is a duty to notify each relevant authority of a pollution incident, where material harm to the environment is caused or threatened. Material harm includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential loss (refer definitions in section 147 of POEOA) or property damage of an amount over $10,000.

Section 5. – Non-conformances, Corrective and Preventive Actions

5.1 Environmental Non-conformances and 'Internal' Responsibilities.

Failure to implement the environmental safeguards detailed in this CEMP, in "work specific" environmental protection documentation, and environmental "incidents" (as covered in CEMP Points 4.2 and 4.3 above) are all deemed to be 'environmental non-conformances'

The nature and extent of the nonconformity is advised to the Program Co-ordinator Transport Construction or, in his absence, the Construction engineer for evaluation of the significance of the nonconformity.

If necessary, subsequent and / or associated work is suspended pending review of the nonconformity.

All QPRC personnel have the authority, responsibility and are encouraged to identify and notify of non-conformances. Refer to the RMCC-CSMP Control of Non-conformances process linked below:

https://au.promapp.com/qprc/Process/Minimode/Permalink/DxRRWi7zEJUIt5I8eP91f5

5.2 Recording, Disposition and Review of Environmental Non-conformances

Non-conformances are raised, processed, 'closed out' and reviewed in accordance with the process and related linked QPRC policies outlined in the process above.

Section 6. – Environmental Protection Processes/Procedures & Other Instruction

As introduced in CEMP Points 1.1 and 1.3 above, the following Environmental Protection processes apply for each of the expected aspects and potential impacts classified as 'significant' and 'moderate' for the Works.

For ease of reference particular 'Site specific' mitigation measures recommended in and / or arising from the REF, and / or RMS' QA Specifications 'called up' for the Works, are included in this section. Note that many 'Site specific' mitigation measures mentioned in the REF are 'usual' requirements for RMS projects, and are not highlighted below.

6.1 Terrestrial Biodiversity Management Sub-Plan (incl. Weed & Pathogens Management)

Instructions to minimise impact on Biodiversity

Threatened flora and vegetation communities	Responsibility of …
• Avoid further clearing and modification, wherever possible, of all native vegetation. • The limits of the corridor of works (disturbance footprint) should be clearly marked (for example, using temporary fencing or bunting) to ensure site disturbance occurs only within the designated works areas and is not unnecessarily extended. • Material stockpile and equipment storage areas should be restricted to existing disturbed areas. • Vegetation clearing should be undertaken in a manner to avoid damage to adjacent vegetation. • Fallen logs and felled tree trunks should be retained on site and used in rehabilitation works on or off site. The remaining portions of felled trees (e.g. upper branches and leaves) should be mulched/chipped and used in erosion mitigation and/or revegetation works. • Vehicle movements should be confined to the disturbance footprint. • Machinery coming from outside the works area should be thoroughly washed down prior to entering the site to reduce the risk of introducing weed species and pathogens. • Priority weed species should be targeted in accordance with the NSW DPI WeedWise recommended control measures (DPI 2019). • Any revegetation of disturbed areas should utilise a seed mix consisting of local provenance species that are typical of the vegetation in the study area. • Council should develop an induction plan to inform workers of appropriate safeguards to limit impacts on vegetation to be retained and to limit impacts on vegetation beyond the disturbance footprint.	Program Co-ordinator and / or Team Leader(s), if needed, in consultation with a suitably experienced ecologist

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.1 Terrestrial Biodiversity Management Sub-Plan (incl. Weed & Pathogens Management) (Cont)

Instructions to minimise impact on Biodiversity (continued)

Threatened fauna - general	Responsibility of …
• Modify the design where possible to retain hollow bearing trees. • Undertake pre-clearing assessment immediately prior to felling of any hollow-bearing trees to identify any resident fauna. Should fauna roosts/nests be identified during this survey, a qualified ecologist should be consulted to determine the appropriate course of action prior to any disturbance. • Felling of any hollow-bearing trees should be supervised by a qualified ecologist or fauna handler. • Hollow-bearing trees should be removed in a way that minimises the risk of harm to fauna (e.g. by clearing surrounding, non-hollow-bearing trees at least one day prior to removing hollow-bearing trees; and by bumping the tree several times to initiate evacuation of any fauna prior to felling). Hollows should be inspected for fauna after felling. • Retain, where possible, all felled hollow-bearing trees or hollow limbs on site or within adjacent vegetation to provide fauna habitat. • Any occupied nests located or any fauna which are inadvertently injured should be reported to WIRES or a similar organisation and relocated from the works area by a suitably qualified fauna handler.	Program Co-ordinator and / or Team Leader(s), if needed, in consultation with a suitably experienced ecologist

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.1 Terrestrial Biodiversity Management Sub-Plan (incl. Weed & Pathogens Management) (Cont)

Instructions to minimise impact on Biodiversity (continued)

Threatened fauna Gang-gang and Glossy Black Cockatoos	Responsibility of …
• Modify the design where possible to retain hollow bearing trees. • Targeted pre-dusk hollow-bearing tree watching surveys (1.5-person hours per tree) should be undertaken for the relevant cockatoo species, based on the time of year. o Gang gang Cockatoos breed between October and January o Glossy Black Cockatoos breed between March and August • If there is no breeding pair present, the tree can be removed during the breeding season of the species surveyed for. • If there is a breeding pair, the tree will be retained with a 20 m buffer around it until the breeding is complete and chicks are fledged. Once breeding is complete and the hollow is vacant, the tree may be removed within the breeding season of the breeding pair. • Should works continue into the breeding season of the second species and clearing has not yet been undertaken, the tree must be checked for a breeding pair/s of the other species. If there is a breeding pair, the tree will be retained with a 20 m buffer around it until breeding is complete and chicks are fledged. Once breeding is complete and the hollow is vacant, the tree may be removed within the breeding season of the breeding pair.	Program Co-ordinator and / or Team Leader(s), if needed, in consultation with a suitably experienced ecologist

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.2 Aquatic Biodiversity

Instructions to minimise impact on aquatic fauna

Fish Passage - maintain and/or enhance	Responsibility of …
• New or replacement waterway crossings should be designed and constructed in accordance with the national guidelines entitled 'Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings' (Fairfull and Witheridge 2003). Crossings should be designed to allow adequate fish passage during operation (Fairfull 2013). The crossings are on *Class 3 – Minimal key fish habitat* and *Class 4 – Unlikely Key Fish Habitat.* Some key points of design are: o For waterway crossings incorporating culverts (including low flow culvert cells), a minimum of 300 mm of water should pool through the structure, with a centrally placed low-flow cell being preferable. o Waterway crossings should be constructed perpendicular to the flow of the water and should be positioned away from channel bends. o Crossings should not increase stream velocity for a given cross-section through the constriction of flow (through pipes or culverts) or lead to significant reductions in water depth. • The timing of works should coincide with low or no flow periods, if possible.	Program Co-ordinator, Construction Engineer and / or Team Leader(s)
Indirect impacts on aquatic fauna – decreased water quality	Responsibility of …
• Develop a CEMP to address pollution and contamination issues, such as silt control and oil/fuel/chemical storage/spill management, which could arise during construction. • Install sediment fences to prevent fine material from entering the waterway. If working directly alongside a pool, install a floating boom with a silt curtain to capture fine material. • Stabilise exposed banks and earthworks around culverts to prevent erosion before vegetation or rock armour is established. This may include placing geofabric on bare soil beneath rock armour, coir logs along drainage lines and jute matting on proposed planting areas. • Avoid using contaminated fill and waste material (tyres, building rubble, etc) near waterways. • All temporary works, flow diversion barriers and in-stream sediment control barriers must be removed as soon as practicable and in a manner that does not promote future channel erosion. • The construction site should be left in a condition that actively promotes native revegetation and creek habitat.	Program Co-ordinator, Construction Engineer and Team Leader(s)

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.2 Aquatic Biodiversity (Cont)

Instructions to minimise impact on aquatic fauna (continued)

Direct impacts on aquatic fauna – dewatering	Responsibility of …
• If dewatering of pools is required, engage a qualified aquatic ecologist to relocate fish and other aquatic fauna upstream.	Program Co-ordinator and Team leader(s)

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.3 Geology and Soils

Instructions to minimise impact on Soils and landscapes

Erosion and Sediment Control and Other Planning	Responsibility of …
Prior to commencing work a copy of the project drawing(s) is to be "marked-up" (either by hand or by drafting) and / or special "Location specific" Environmental Line Work Plans (ELWP's) developed; as further described in CEMP Point 6.7 below "Marked-up" drawings and / or ELWP's are to include, as applicable, and as a minimum:- • "Location specific" erosion and sediment control (E&SC) measures to be installed [Erosion and Sediment Control Plans (E&SCP's)]; • Location of spoil and imported material stockpile sites (away from any floodway(s)); • Location of designated concrete truck 'wash-outs'; and • Details of / infrastructure for clean water diversion Excavation is not to commence until the Program Co-ordinator has considered and, if required, approved these E&SCP's / ELWP's. The E&SCP's / ELWP's are to be reviewed and, if necessary, revised:- • Whenever the scope of works changes; • Whenever the scope of environmental protection work and / or, as applicable) when work methods change; • Whenever environmental protection measures are found to be ineffective; and / or • When directed to do so by relevant statutory authorities and / or QPRC's (corporate) environmental representative	Program Co-ordinator, Duly trained QPRC person and / or accredited consultant

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.3 Geology and Soils (Cont) …

Instructions to minimise impact on Soils and landscapes (Cont)…

Earthworks and excavation may result in increased erosion risk and sedimentation of waterways • Ensure that any site access is stabilised to reduce tracking of sediment off site with approaches kept free of dust during works. • Minimise extent of disturbed area through appropriate staging and completion of works in shortest possible timeframe. • Topsoil stripping shall occur while soil is reasonably moist if possible. • Loads of soil and other erodible materials transported to and from the site to be kept covered at all times during transportation and remain covered until unloading for use or disposal at appropriate waste facility. • Excess spoil will be placed in stockpiles, reused on site or properly disposed of offsite. • Work areas to be watered as necessary particularly during dry and windy conditions. • Progressive rehabilitation and revegetation of disturbed areas to be undertaken during construction period to the greatest extent possible • Topsoil shall not be respread during high wind conditions.	Responsibility of … Team Leader(s) and Designated Labourers
Discovery of contaminated soil • If contaminated areas are encountered during construction, appropriate control measures will be implemented to manage the immediate risks of contamination. All other works that may impact on the contaminated area will cease until the nature and extent of the contamination has been confirmed and any necessary site-specific controls or further actions identified in consultation with Council and/or EPA.	Responsibility of … Team Leader(s), if necessary, in consultation and Suitably Qualified Consultant
Soil contamination resulting from accidental spills • A site-specific emergency spill plan will be developed.	Responsibility of … Program Co-ordinator, Construction Engineer and Team Leader(s)

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.3 Geology and Soils (Cont) …

Instructions to minimise impact on Soils and landscapes (continued)

Rehabilitation of disturbed areas	Responsibility of …
• A rehabilitation plan would be prepared for all areas disturbed by construction works proposal and would include the following: ○ Ensure areas disturbed during construction (including laydown areas and ancillary sites) are stabilised progressively during construction and restored back to original condition or re-vegetated with appropriate species (native in native dominated areas) as soon as practical. ○ Include monitoring to meet clear targets, regarding vegetation establishment and stabilisation of bare areas of soil.	Program Co-ordinator, Construction Engineer and Team Leader(s)

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.4 Hydrology and Water Quality

Instructions to minimise impact on Water Quality

Impacts on water quality associated with the proposed works have the potential to occur during the construction phase within the subject site and downstream.

These impacts can have implications for both aquatic ecosystem health and human health when considering potential effects on sensitive receiving environments downstream. Reduced water quality, decreased light penetration through the water column, filling pools and covering hard substrate with sediments may alter primary (plant) and secondary (animal) production that supports or regulates the aquatic food web.

Impacts on water quality during construction can be minimised effectively with the diligent implementation of mitigation measures as below.

Loss of soil and sediment during construction	Responsibility of …
• Erosion and sediment control measures should be implemented prior to any construction works commencing and remain in place until exposed areas are rehabilitated and stabilised. Measures should include some or all the following: o Placement of geofabric on exposed banks before vegetation is established (and beneath rock armour) o Coir logs along drainage lines o Jute matting on proposed planting areas o Silt fencing downstream of the works o Silt curtains o Temporary catch drains to divert clean run on water o Bunding around stockpiles o Sediment fences upslope of all drainage lines o ESC measures to be implemented in accordance with the CEMP, manufacturers specifications and appropriately maintained at regular intervals and following any rainfall and runoff events o Ground disturbance works including vegetation removal and earthworks to be scheduled or periods of dry weather and not during heavy rainfall events o Newly constructed batters to be stabilised as soon as practicable by topsoiling and sowing an appropriate cover crop o All spills or soil or other erodible material on sealed access routes or roadways to be immediately cleaned up and removed (by manual means where possible)	Program Co-ordinator, Construction Engineer and / or Team Leader(s), if needed, in consultation with a suitably experienced ecologist

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.4 Hydrology and Water Quality (Cont) …

Instructions to minimise impact on Water Quality (continued)

Accidental petrochemical spills during construction • Petrochemicals or other chemicals to be stored in appropriate transportable storage containers, away from watercourses and drainage lines, flow paths. • Refuelling of plant and equipment to be undertaken away from watercourses and within areas appropriately bunded. • A spill kit to be kept onsite and staff trained in its use. • Equipment, machinery and vehicles should be regularly maintained (documented).	Responsibility of … Team Leader(s) and Designated Labourers
Flooding during construction • A Flood Contingency Plan would be developed to manage the potential impacts of flooding on the construction site.	Responsibility of … Program Co-ordinator, Construction Engineer and / or Team Leader(s), if needed, in consultation with a suitably experienced ecologist
Loss of construction and domestic waste • General solid waste to be collected and disposed of at Council Waste Transfer facilities. • Onsite portable toilets to be maintained and waste collected and properly disposed of by licensed contractor.	Responsibility of … Team Leader(s) and Designated Labourers

6.5 Air Quality

Instructions to minimise impact on Air Quality

Plant and equipment, if not properly maintained, has the potential to adversely impact on air quality and to generate excessive greenhouse gases. Odours from excavated earth are usually not expected to be significant and where occurring will be minor and localised. Construction activities plus associated plant and truck movements have potential to generate dust.

The objective of the following instructions is to preserve air quality, minimise greenhouse gas emissions, and to minimise dust generated and dust nuisance from the Works.

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.5 Air Quality (Cont) …

Instructions to minimise impact on Air Quality (continued)

Construction air quality impacts – transportation	Responsibility of …
• Materials to be covered during transport to minimise dust emissions. • Stabilised and well-maintained site access to reduce tracking of sediment off site and to ensure approaches kept dust free.	Team Leader(s) and Designated Labourers
Exhaust emissions	Responsibility of …
• Vehicles and machinery should not be left idling when not in use. • Equipment, machinery and vehicles should be regularly maintained (documented). • Traffic control measures implemented in accordance with Council's Traffic Management Plan (TMP) to minimise stationary idling vehicles.	Team Leader(s) and Designated Labourers

6.6 Noise and Vibration

Instructions to minimise impacts resulting from noise and vibration

Elevated noise levels during construction	Responsibility of …
• Hours of work limited to specified hours (Monday to Friday between 6:30 a.m. and 5:30 p.m. and Saturday 6:30 a.m. and 2 p.m. • Vehicles and machinery should not be left idling when not in use • Equipment, machinery and vehicles should be regularly maintained (documented). • Well planned site layout to ensure where practical that noisy plant and machinery and overnight parking locations are located away from nearby residences with reversing also minimised in these locations. • Community consultation and notification for potentially noise affected residences detailing timing of noisy activities. • Mechanism to provide noise complaints using signage and usage of a complaints register with relevant triggers for noise monitoring if required.	Program Co-ordinator, Construction Engineer and / or Team Leader(s), if needed, in consultation with a suitably experienced ecologist

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.7 Traffic and Safety

Instructions to minimise impacts from increase in construction traffic

Increased heavy vehicle traffic and lane closures may disrupt traffic movement and access on local roads	Responsibility of …
• Ensure that a best practice TMP is prepared prior to works commencing to ensure traffic is safely managed and that residents with local properties continue to have road access during the implementation of the proposal. • Ensure all workers adhere to relevant OH&S standards and provide workers compensation insurance. • Construction traffic movements associated with the proposal will be kept to the minimum necessary to efficiently and safely implement the proposal. • Traffic impacts in association with the proposal will be restricted to the hours of construction, which would be undertaken between 6:30 a.m. to 5:30 p.m. Monday to Friday and Saturday 6:30 a.m. to 2 p.m. with no work on Sundays or public holidays. • Consultation with residents regarding access, closures and work scheduling prior to works commencing.	QPRC 'weeds officer', Team Leader(s) and Designated Labourers

6.8 Socio Economic

Instructions to minimise the negative Socio Economic impacts

Traffic delays	Responsibility of …
• The proposed works should be undertaken outside of the peak summer season and holiday periods. • Undertake early community engagement, early notification / advertisement of construction period through both local and regional channels. • Development of TMP.	Program Co-ordinator and / or Team Leader(s), if needed, in consultation with a suitably experienced ecologist

Section 6. – Environmental Protection Procedures / Sub-Plans (Cont) …

6.9 Environmental Line Work Plans (ELWP's)

Further to CEMP Points 1.3 and 1.4 above, the Program Co-ordinator Transport Construction (or his nominated delegate) may consider it necessary to prepare one or more "Location specific" Environmental Line Work Plan (ELWP) (Document No.'s ELWP-*Various*) to further instruct field personnel on particular environmental protection requirements / issues.

"Location specific" ELWP's are considered necessary in instances where protection measures are to be established at a particularly environmentally sensitive location and / or 'complex' protection measures are required.

An ELWP form has been developed (refer **PSP-C Tab 47**), but its use is not mandatory and ELWP's can be in whatever format the author considers appropriate.

If developed, the Program Co-ordinator Transport Construction (or his nominated delegate) maintains a 'register' of "Location specific" ELWP's on each site for review and / or formal auditing. CEMP Point 7.3 below relates.

Section 7. – Documentation, Monitoring and Reporting

7.1 Control, Management Review, Revision and Distribution of CEMP

This CEMP is controlled and revised in accordance with the procedures outlined in QPRC's Council System Plan section 2 and the PSP-C management plan for this project.

This CEMP is formally reviewed at least once during the Works by the Program Co-ordinator Transport Construction (or his delegate) to ensure that this CEMP remains relevant to the Works and to identify opportunities for continual improvement of environmental management processes and safeguards.

A Schedule of Audits and Management Review is included **in the PSP-C Attachment 6** and is managed according to the *RMCC-CSMP Internal audit program process* linked below:

https://au.promapp.com/qprc/Process/Minimode/Permalink/DLQTnfW98bBIxOf1o3H7jD

Regarding environmental considerations, management reviews comprise of the following; as a minimum: -

i. identification of areas of opportunity for improved environmental performance;
ii. analyses of the causes of nonconformities and deficiencies, including those identified in environment inspections and audits (CEMP Section 5 and Point 7.3 below relate);
iii. verification of the effectiveness of corrective and preventative actions (CEMP Section 5 relates); and
iv. highlighting of any changes in environmental safeguards resulting from process improvement.

Revisions to and distribution of this CEMP are recorded on CEMP Page 2.

7.2 Changes to and / or 'Special' Environmental Requirements

Changes to and / or 'special' environmental requirements for the Works are communicated to site personnel by way of tool box meetings and, if necessary, issue of "internal" site instructions and / or "Location specific" ELWP's. CEMP Point 6.7 above relates. As necessary, revisions are made to this CEMP and distributed accordingly.

7.3 Daily Inspections and Reviews, and Audits of Compliance

QPRC carries out the following "internal" inspections and reviews and formal audits.

The Team Leader(s) are responsible for informal daily inspections and reviews of environmental compliance, carried out in accordance with RMS' Guidance Note: Environmental Inspection Reporting [June 2015]

The Team Leader(s) are also responsible for formal weekly inspections and reviews of environmental compliance and record their findings on (or with reference to) a "Project

specific" Environmental Management Inspection & Test Plan as per the PSP-C Section 15 and to the process below:

https://au.promapp.com/qprc/Process/Minimode/Permalink/lfk3RFkiWzaCffdbZTHOl

Section 7. – Documentation, Monitoring and Reporting (Continued) …

7.3 Daily Inspections and Reviews, and Audits of Compliance (Continued) …

The Program Co-ordinator Transport Construction (or his delegate) is responsible for formal audits of environmental compliance.

Arrangements are made in consultation with a lead auditor and a Schedule of Audits and Management Review is included **under PSP-C Attachment 6**.

7.4 Records of Environmental Activities and Inspections

The Program Co-ordinator Transport Construction is responsible to maintain, as part of project records, legible environmental records of all environmental activities associated with the Works; including:-

i. site environmental inspection reports;
ii. environmental monitoring data and reports;
iii. 'internal' audit reports;
iv. reports of environmental incidents, environmental complaints, associated actions taken, and follow-up actions;
v. minutes of management review meeting(s); and
vi. induction and training records.

These records of environmental activities are to be held for at least five years after the Works actual completion date and are to be made available to authorized NSW EPA officers; on request.

Environmental inspections and associated issues identified are summarised in a monthly report prepared and submitted to the RMS Representative using (and based on) RMS' Field Data Collection Sheet ('FDCS') for Systems Performance Reports ('SPR')

The template is linked through the Systems performance reporting process linked below:

https://au.promapp.com/qprc/Process/Minimode/Permalink/D3o28DtozY7I8uXzafHE3b

Section 8. – Associated Documents / Appendices

8.1 Associated Documents / References

Rev 1 *'Unpriced' Copy of 'Minor Works' Contract* **under PSP-C Attachment 2 Works Program;**

RMS' QA Specification G36: Environmental Protection;

RMS' QA Specification G38: Soil and Water Management;

NSW Government Environmental Management System Guidelines (3rd Edition; August 2013);

QPRC's organisation structure and various relevant contact details **under PSP-C Attachment 1;**

Eco Logical Australia Pty Ltd' Document titled "Little Burra Road to London Bridge Road REF" (REF), issued in October 2019, **under PSP-C Attachment 8.2**;

RMS' Environmental Incident and Classification Reporting Procedure [September 2017];

RMS' Code of Practice for Water Management (RTA, 1999);

"Contract specific" Incident and Emergency Management Plans **under PSP-C Attachment 11;**

Landcom (formerly NSW Department of Housing) Manual 'Managing Urban Stormwater – Soils and Construction' [4th Edition, March 2004] ('Blue Book');

RMS' 'G38' Drawings and Landcom 'Blue Book' Diagrams **under PSP-C Tab 15;**

'Site specific' Erosion and Sediment Control Plans (E&SCP's) **under PSP-C Attachment 16;**

Australian Standard AS 4343-2007: Pruning of amenity trees;

If developed, "Location specific" ELWP's development follows the process linked below:

https://au.promapp.com/qprc/Process/Minimode/Permalink/FsxbH2NRFK8dq1CzyEEjZY

RMS' Stockpile Site Management Guideline (EMSTG-10) **under PSP-C Attachment 12.3;**

WaterNSW *Rural Earthmoving in the Sydney Drinking Water Catchment* and *Guidelines for Treatment of Stormwater Runoff from the Road Infrastructure* ;

Section 8. – Associated Documents / Appendices (Continued) …

8.1 Associated Documents / References (Continued) …

NSW Environmental Protection Authority (EPA) Interim Construction Noise Guideline

Chapter 9: Construction Equipment Noise Levels and Ranges, of the US Federal Highway Administration Construction Noise Handbook.;

EU Noise & Traffic Information Site – Noise levels of equipment used outdoors;

Roads and Maritime Services Biodiversity Guidelines 2011;

NSW Government Guidelines for Controlled Activities on Waterfront Land; and
NSW Government Guidelines for Riparian Corridors,

RMS' Guidance Note: Environmental Inspection Reporting [June 2015];

Refer to the CSMP for Safety, Quality, Environment and Traffic management systems linked to the process below:

https://au.promapp.com/qprc/Process/Minimode/Permalink/FHi04ycGOKRvpyCL7v2UtC

8.2 Environmental Management Plan Appendices

None