

4 ENVIRONMENTAL MANAGEMENT

4.1 ENVIRONMENTAL MANAGEMENT PLAN

Section 4 of the PMP and the accompanying Appendix 1 represent the project specific Environmental Management Plan (EMP).

RCC's Environmental Policy has been included in Appendix 1.

4.2 PURPOSE OF THE ENVIRONMENTAL MANAGEMENT PLAN

The purpose of this Environmental Management Plan is to:

- Identify the environmental issues (aspects and impacts) for this project;
- Establish, communicate & implement environmental operational controls to reduce any adverse impacts on the environment from RCC's activities, products and services.
- Implement and Monitor compliance by RCC and its suppliers & subcontractors with the requirements of all relevant environmental legislation, conditions of any applicable licence, approval and permit, regulatory requirements and this EMP.
- Action any outcomes from incidents or accidents, project audits or other identified non-conformances to continually improve the RCC environmental management system.

4.3 PROJECT OBJECTIVES AND TARGETS - ENVIRONMENT

RCC's project level environmental objectives and targets have been listed below.

Progress in meeting these objectives and targets will be reported in the Project Reports.

Project specific objective and targets are to be identified, listed and tracked internally

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|-------------|---|
| ENVIRONMENT | <ul style="list-style-type: none">• "O/T" Minimise impacts on the community by action community complaints within 24hrs, no repeat complaints• "O" Reduce environmental impacts by investigating, documenting and rectifying non-effective environmental controls• "O/T" Legal compliance by aiming for zero EPA/Local council clean up notices per year• "T" 4 site walks per month documented• Green Star 4 Design & As Built |
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4.4 RESPONSIBILITIES

Refer to the project Responsibilities and Authorities Matrix in Appendix 1.

4.5 ENVIRONMENTAL RISKS/ ENVIRONMENTAL ASPECTS

Potential environmental obligations and risks associated with RCCs projects will be identified in the project risk workshop, as described in Section 1, Project Planning.

Additionally, environmental impacts associated with trades/activities etc will be identified using the Environmental Risk Matrix, Appendix 1.

The Environmental Risk Matrix will be reviewed and updated as a (minimum 6 monthly) and updated in section 4.2 of the PMP. Where risks are identified as medium to high in the matrix, the impacts associated with RCC's activities, Contractual requirements, DA, Products and services will be deemed as "significant" and require operational controls as described in Appendix section 4.3.

Significant aspects may impact on the environment positively (eg. recycling) or negatively (eg. pollution).

The Environmental Risk Matrix will be provided to subcontractors and suppliers as part of the subcontract and supply contracts.

4.6 LEGISLATIVE COMPLIANCE

Legislative requirements that apply to the project are detailed in Appendix 1 legal register. The PM will amend the legal register to make it project specific

Where Development Consents, permits or approvals relate specifically to the project, these issues will also be deemed as "significant" and will be included in the project environmental risk assessment, Project Environmental Management Plans & environmental procedures.

The RCC intranet provides a summary of key environmental legislation and how it relates to the company's activities, products and services.

4.7 ENVIRONMENTAL IMPACTS AND CONTROLS

4.7.1 PROJECT ENVIRONMENTAL MANAGEMENT PLANS

Project Environmental Management Sub-Plans (Appendix 1) describe operations controls to manage environmental issues. The Project Environmental Management Sub-Plans have been developed these for part of the DA requirements.

The Site Supervisor will inspect the environmental controls in accordance with these plans.

Information on hazardous materials, including each material's potential impact on the environment and measures to be taken in the event of accidental release will managed via the Hazardous Substances Register [Form 21.3](#).

4.7.2 SUPPLEMENTARY ENVIRONMENTAL PROCEDURES

Supplementary procedures required by the contract or deemed necessary by the Project Manager will be attached to this plan under Appendix 1. Where required, these documents may require preparation by a special consultant.

Also refer to the RCC intranet.

Supplementary procedures required are:

- Soil and Surface Water Management
- Noise Management
- Community Involvement (refer Section 4.12.2)
- Landscaping and Revegetation
- Flora and Fauna Management
- Traffic Management Plan (refer Appendix 1)
- Air Quality Management

- Waste Management (including a waste management register)
- Indigenous and European Heritage
- Importation of Fill / Remediation Action

4.7.3 SUBCONTRACTORS AND SUPPLIERS

Sub-contractors, and where relevant suppliers, engaged at the site must meet the environmental management requirements specified in the EMP.

The Subcontractors are made fully aware of their responsibilities under the terms of the applicable environmental legislation, all subcontractors will be provided a copy of the project Environmental Management Plans and will participate in site induction.

Subcontractors whose activities may have a significant impact on the environment (refer Risk Assessment) will be requested to submit Safe Work Method Statements (SWMS), ITPs or environmental procedures with details of how they manage any environmental aspects and impacts associated with their activities.

Consideration of normal and abnormal operations, along with emergency scenarios will be included in the SWMS as required.

Subcontractor performance will be monitored against their contract requirements and appropriate environmental management practices are being followed.

4.7.4 CONTAMINATED SITE PROCEDURE & WASTE MANAGEMENT

Projects undertaken by RCC on contaminated sites will have Contaminated Site Assessment (CSA) reports available. The CSA reports are required to be provided as part of planning approvals process of a proposed development.

It is essential that any obligations on recommendation made with the CSA or associated approvals are reviewed in detail.

All relevant CSA reports, documents and relevant approvals will be obtained and reviewed prior to site activities commencing. Operational controls will include any specific procedures described in the report or approvals.

Where required, ITPs and/or SWMS will be developed and completed to address requirements of CSAs

The Site Manager will notify the site workforce of potential contamination issues associated with the contaminated site development and that they seek advice should problems be identified.

The Site Manager will maintain spoil disposal records using [Form 18.1](#) Record of Waste and [Form 18.4](#) Waste Tracking. Disposal dockets are to be reconciled with quantities of materials leaving the site. Dockets are to be retained for RCC records.

4.7.5 IMPORTED FILL

The Project Manager will ensure that records will be maintained of all products such as imported fill, recycled products etc used on site to enable traceability if future health and safety issues arise.

No fill is to be imported to site without a Consultants Validation report for the material that indicates its suitability for the land use.

[Form 25.08](#) Imported fill register will be used along with marked up drawings of the fill areas.

4.8 MONITORING

4.8.1 INSPECTIONS AND FIELD TESTING

Environmental site inspections will be undertaken using [Form 18.3](#) at a frequency listed in the Site Task Checklist, Appendix 1. The form is to be made site specific based on the identified risks.

Field testing of water collected on site (excavations, trenches, paint washout etc) will be tested prior to discharge and results record on the Dewatering & Field Test Sheet. [Form 18.6](#)

Other inspections and testing will be performed as required by plans described in Section 4.7.1.

4.8.2 PERFORMANCE OF THE EMP

The Project EMP will be monitored following implementation:

- Environmental operational controls are being effectively applied;
- Project specific environmental monitoring targets specified in the Development Consent or other planning permits for air, water and noise are met;
- Unpredicted impacts are identified and remedial action is taken; and
- The project objectives being met.

Responsibilities for monitoring and compliance requirements are detailed in the Project Environmental Plans.

Monthly reports are provided to the RCC Directors for review and the performance of projects against RCC's company objectives and targets is reviewed on a quarterly basis.

Monthly reports are to be formatted and provided to the respective client with each monthly progress claims for review and comment if necessary.

4.9 COMMUNICATION AND CONSULTATION

4.9.1 TRAINING

Prior to the commencement of project activities, all site personnel (including sub-contractors) will attend a site induction. This will include an outline of the requirements of this EMP and the responsibilities and accountabilities of all site personnel.

The project environmental site rules will be included in the induction session.

Training records will be kept to verify who has attended the training. Refer Site Inductions Section 3.5

4.9.2 COMMUNITY CONSULTATION

The Supervisor shall conduct and encourage RCC employees and subcontractors to conduct toolbox meetings to address safety & environmental hazards in and around the site, community interactions & feedback, company alerts posted on Crookes net, Client raised environmental issues, safe work practices, coordination and responsibilities.

The Project Manager will advise relevant residents of the nature and scope of works.

4.9.3 EXTERNAL STAKEHOLDERS

External stakeholders in the project have been listed in Section 1, Emergency/Stakeholder Contact Details:

4.9.4 COMMUNITY COMPLAINTS

Upon receiving a community complaint, site personnel are to complete [Form 18.5](#) Community Feedback.

Remedial action must be taken as soon as practical Note it is an RCC objective to have all complaints actioned with 24hours. Any action taken must be recorded on the form.

The Supervisor is to include the completed [Form 18.5](#) in the site files.

4.10 EMERGENCY PLANNING & RESPONSE

Refer to the Incident and Emergency Plan in Appendix 1.

4.11 INCIDENT INVESTIGATION & REPORTING

4.11.1 INTERNAL RCC REQUIREMENTS

Refer to Procedure [QAP-8.5-001](#) Incident & Accident Reporting.

The Supervisor shall ensure that all incidents occurring in or around the site, involving RCC personnel, subcontractors, visitors or passers-by, are investigated and reported regardless of how minor they appear at the time of the occurrence.

Where a legal breach has been identified (by RCC or other stakeholders such as the EPA or Local Council) or where clean up costs occur, [Form 01.1](#) Incident – Accident Report Accident will be completed. The original is to be forwarded by the Project Manager to the Business Systems/Environmental Manager and WHS Manager.

4.11.2 DUTY TO NOTIFY ENVIRONMENT PROTECTION AUTHORITY (EPA) OF POLLUTION INCIDENT

RCC must notify the EPA Pollution Line on telephone 131 555 pollution incidents which have occurred in the course of RCC's activities, in the following circumstances:

- if the actual or potential harm to the health or safety of human beings or ecosystems is not trivial, if actual or potential loss or property damage (including clean-up costs) associated with a pollution incident may exceed \$10,000.

Further to the aforementioned, RCC must notify the client and/or representative of any pollution or the like as soon as possible.

4.12 NON CONFORMANCE

In the event of breach in the requirements of the EMP, such as:

- Non compliance with the RCC/ subcontractors SWMS or other environmental procedures;
- Non complying activities noted during site inspections (high risk or potential for legal breach);
- Following concerns regarding potential breaches in environmental legislation raised by RCC, the client or other stakeholders such as local council or the EPA;
- Changes to the RCC system or subcontractors procedures, as a result of corrective or preventative action following and environmental incident, inspection or external audit.

[Form 31.1](#) – Non Conformance Report or via Aconex will be completed and issued to the offending party.

Non Conformances will be registered in [Form 31.2](#) Non Conformance Report Register or on soft copy.

A copy of the Non Conformance Notice will be forwarded to the Project Manager and the subcontractor, who will implement appropriate corrective action.

Additionally Contractors Notices or Main Contractor Notices may be issued in certain circumstances, as described in Section 2 of the PMP.