

# Construction Environmental Management Plan

M12 Motorway – Central package

January 2025





**Transport for New South Wales**

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## Document control

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## Approval and authorisation

Plan reviewed by:	Plan endorsed by:
	
Seymour Whyte Environmental Site Representative	Seymour Whyte Project Manager
18/01/2025	18/01/2025
	

## Revision history

Revision	Date	Description
A	18/02/2022	First draft for TfNSW review
B	29/04/2022	Updated in response to TfNSW review
C	20/06/2022	Updated in response to TfNSW review
D	27/07/2022	Updated in response to TfNSW and ER review
E	17/08/2023	Updated in response to OCEMP review
F	18/01/2025	Updated in response to OCEMP review

## List of emergency and key contacts

Position / Organisation	Name	Phone
EPA pollution hotline	n/a	131 555
Fire and Rescue NSW	n/a	000 (for pollution incidents that present an immediate threat to human health or property)  1300 729 579 (for pollution incidents that do not present an immediate threat to human health or property)
NSW Health – South Western Sydney Local Health District	n/a	(02) 8738 5755
SafeWork NSW	n/a	131 050
Penrith City Council	██████████	██████████
Fairfield City Council	██████████	██████████
Liverpool City Council	██████████	██████████
24 hour community information line	n/a	1800 517 155
TfNSW Deputy Project Director, M12	██████████	██████████
TfNSW Delivery Manager M12	██████████	██████████
TfNSW Project Manager – East	██████████	██████████
TfNSW Project Manager – Central	██████████	██████████
TfNSW Project Manager – West	██████████	██████████
TfNSW Project Director, M12	██████████	██████████
TfNSW Environment and Sustainability Manager	██████████	██████████
TfNSW Environment and Sustainability Manager	██████████	██████████
TfNSW M12 Community and Stakeholder Engagement Representative	██████████	██████████



Position / Organisation	Name	Phone
TfNSW M12 WHS Partner		
TfNSW Environment Officer		
TfNSW Sustainability Advisor		
Department of Planning, Housing, Industry and Environment		
Sydney Metro – Western Sydney Airport		
University of Sydney		
Western Sydney International Airport		
Western Sydney Parklands Trust		
Seymour Whyte Project Manager		24 hour contact in an emergency
Seymour Whyte Construction Manager / Superintendent		
Seymour Whyte Environmental Site Representative		24 hour contact in an emergency
Seymour Whyte Site Safety Representative		
Seymour Whyte Community Relations Manager		
	Non-Aboriginal Heritage – Heritage NSW	
	Aboriginal Heritage – Heritage NSW	
	DPI Fisheries	
	EPA	
	EPA	
	SEEC (TfNSW Soil Con)	
	ER (HBI)	
	ER (HBI)	

Position / Organisation	Name	Phone
██████████	TMC	████████████████████
██████████	Sydney Water	████████████████████

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## Glossary/Abbreviations

Abbreviation	Expanded text
AR	Amendment Report
Areas of vegetation to be retained	These areas present potential opportunities for the Construction Contractor to avoid and minimise potential vegetation impacts if possible. As vegetation impacts may occur during construction, these impacts have been considered in biodiversity off-set calculations.
ARSR	Amendment Report Submissions Report
BC Act	Biodiversity Conservation Act 2016 (NSW)
CA	Consistency Assessment
CAQMP	Construction Air Quality Management Sub-plan
CCHMP	Construction Cultural Heritage Management Sub-plan
CCLMP	Construction Contaminated Land Management Sub-plan
CEMP	Construction Environmental Management Plan
CFFMP	Construction Flora and Fauna Management Sub-plan
CFMP	Construction Flood Management Sub-plan
CLM Act	<i>Contaminated Land Management Act 1997</i>
CMS	Complaints Management System
CNVMP	Construction Noise and Vibration Management Sub-plan
Commonwealth CoA	Federal Conditions of Approval under the EPBC Act
Construction	Includes all activities required to construct the CSSI as described in the documents listed in Condition A1, including commissioning trials of equipment and temporary use of any part of the CSSI, but excluding Low Impact Work which is carried out to complete prior to the approval of the CEMP, works approved under a Site Establishment Management Plan, approved under a Consistency Assessment, demolition of acquired residential houses, structures and sheds, and works specified in Appendix B of the Infrastructure Approval and approved under an environmental management plan(s) in accordance with Condition A24.
Compliance audit	Verification of how implementation is proceeding with respect to a CEMP (which incorporates the relevant approval conditions)
CSSI	Critical State Significant Infrastructure
CSWMP	Construction Soil and Water Management Sub-plan
CTTMP	Construction Transport and Traffic Management Sub-plan
CWRMP	Construction Waste and Resource Management Sub-plan
DAWE	Former Commonwealth Department of Agriculture, Water and the Environment (Now Department of Climate Change, Energy, the Environment and Water)
DEC	Former NSW Department of Environment and Conservation, now Environment and Heritage Group (EHG)



Abbreviation	Expanded text
DECC	Former Commonwealth Department of Environment and Climate Change
DIPNR	Former Department of Infrastructure, Planning and Natural Resources
Division 5.2 Approval	Approval issued by the NSW Minister for Planning and Public Spaces for the M12 Motorway.
DPC Heritage	Department of Premier and Cabinet (Heritage)
DPE	Former NSW Department of Planning and Environment
DPIE	Former Department of Planning, Industry and Environment
DPHI	NSW Department of Planning, Housing and Infrastructure (formerly NSW DPIE)
EAD	Environmental Assessment Documentation
EAP	Environmental Audit Program
Ecologically sustainable development	Using, conserving and enhancing the community's resources so that the ecological processes on which life depends are maintained and the total quality of life now and in the future, can be increased (Council of Australian Governments, 1992).
EIS	Environmental Impact Statement
EEC	Endangered Ecological Community
EES	Former Environmental, Energy and Science
EHG	Environment and Heritage Group (a part of NSW DPE)
EMM	Environmental Management Measure as outlined in the Project EIS documentation
EMS	Environmental Management System
Environmental aspect	Defined by AS/NZS ISO 14001:2015 as an element of an organisation's activities, products or services that can interact with the environment.
Environmental Assessment Documentation	<p>The set of documents that comprise the Division 5.2 Approval:</p> <ul style="list-style-type: none"> <li>• Roads and Maritime Services (October, 2019) M12 Motorway, Environmental Impact Statement (EIS)</li> <li>• Transport for NSW (October, 2020) M12 Motorway, Submissions Report (the Submissions Report)</li> <li>• Transport for NSW (October, 2020) M12 Motorway, Amendment Report (AR)</li> <li>• Transport for NSW (December, 2020) M12 Motorway, Amendment Report submissions report (ARSR)</li> <li>• Transport for NSW (March, 2021) The M12 Motorway Amendment Report Submissions Report – Amendment (ARSR amendment)</li> <li>• WSP (October, 2021) M12 Motorway – West Package Detailed Design Consistency Assessment</li> </ul>

Abbreviation	Expanded text
	<ul style="list-style-type: none"> <li>• GHD (October, 2021) M12 Motorway – Central Package Detailed Design Consistency Assessment</li> <li>• Arcadis (June, 2022) M12 Motorway – Sydney Water Crossings Consistency Assessment</li> <li>• Arcadis (July, 2022) M12 Motorway – Design Boundary Changes Consistency Assessment</li> <li>• Arcadis (August, 2022) M12 Motorway – Minor Consistency Assessment for Proposed Change to the M12 Motorway Project (M12 Central)</li> <li>• Arcadis (September, 2023) M12 Motorway – Devonshire Road Temporary Roundabout Consistency Assessment</li> <li>• WSP (September, 2023) M12 Motorway – Elizabeth Drive Connections Consistency Assessment</li> <li>• TfNSW (September, 2023) M12 Motorway – Minor Consistency Assessment M12 West demolition of structures at 752 Luddenham Road</li> <li>• TfNSW (October, 2023) M12 Motorway – Minor Consistency Assessment M12 East AF9 Power Supply</li> <li>• TfNSW (October, 2023) M12 Motorway – Minor Consistency Assessment M12 East Cecil Road Laydown Area</li> <li>• TfNSW (October, 2023) M12 Motorway – Minor Consistency Assessment M12 East Temporary Construction Signage</li> <li>• Arcadis (December, 2023) M12 Motorway – East Site 48, 50 and 51 Boundary Changes Minor Consistency Assessment</li> <li>• Arcadis (January, 2024) M12 Motorway – Minor Consistency Assessment M12 Central Water Tower Access Road</li> </ul> <p>The documents that comprise the EPBC referral:</p> <ul style="list-style-type: none"> <li>• Submission #3486 – The M12 Motorway Project between the M7 Motorway, Cecil Hills and The Northern Road, Luddenham, NSW</li> </ul> <p>Notification of referral decision and designated proponent - controlled action; date of decision 19 October 2018; ID: 2018-8286.</p>
Environmental impact	Defined by AS/NZS ISO 14001:2015 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
Environmental incident	An unexpected event that has, or has the potential to, cause harm to the environment and requires some action to minimise the impact or restore the environment.
Environmental objective	Defined by AS/NZS ISO 14001:2015 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.

Abbreviation	Expanded text
Environmental policy	Statement by an organisation of its intention and principles for environmental performance.
Environmental target	Defined by AS/NZS ISO 14001:2015 as a detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of construction. A key point of contact for the Planning Secretary in relation to environmental performance of the CSSI.
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EPA	NSW Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPBC referral	A Proponent must refer a proposed action to the Australian Government Minister for the Environment (the Minister) for assessment, if it has, will have, or is likely to have a significant impact on the world heritage values of a declared World Heritage property, or is likely to have a significant impact on the National Heritage values of a National Heritage place.
EPL	Environment Protection Licence
ERG	Environmental Review Group – generally comprising representatives of TfNSW, ER, Project delivery team, regulatory authorities (EPA, EHG) and councils (Penrith City Council, Liverpool City Council and Fairfield City Council). The ERG will be maintained for the duration of the Project and will meet regularly and undertake environmental inspections. The role the ERG is to work collaboratively with the project team to provide proactive advice on environmental management issues on the Project.
ESCP	Erosion and Sediment Control Plan
ESM	TfNSW Environment and Sustainability Manager
ESR	Environment Site Representative (Seymour Whyte)
EWMS	Environmental Work Method Statement
Exclusion zones	Exclusion zones are areas of environmental importance (e.g., threatened vegetation or heritage items) that need to be protected. These exclusion zones are defined as no-go areas and are to be protected for the duration of construction in that particular footprint area.
FM Act	<i>Fisheries Management Act 1994</i>
Hold point	Is a verification point that prevents work from commencing prior to approval from TfNSW Services
Infrastructure Approval	Approval (SSI 9364) for carrying out of the M12 Project under Section 5.19 of the <i>Environmental Planning and Assessment Act 1979</i> subject to specific CoA as detailed in Schedule 2 of the approval.
ISCA	The Infrastructure Sustainability Council of Australia who issues IS Ratings valuating sustainability across the construction phases for the Project
km	kilometres

Abbreviation	Expanded text
LGA	Local Government Area
LLEP	Liverpool Local Environmental Plan
Minister, the	Minister of the NSW Department of Planning and Environment (or delegate)
MNES	Matters of Environmental Significance
NCR	Non-conformance report
Non-compliance	Failure to comply with the requirements of the Project approval or any applicable licence, permit or legal requirements.
Non-conformance	Failure to conform to the requirements of Project system documentation including this CEMP or supporting documentation.
Notifiable event	Any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify a regulatory authority.
NRAR	Natural Resources Access Regulator
NSW CoA	NSW Conditions of Approval
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water (formerly NSW DPE which has now been split into NSW DCCEEW and NSW DPHI)
OCAQMP	Overarching Construction Air Quality Management Sub-plan
OCCHMP	Overarching Construction Cultural Heritage Management Sub-plan
OCCLMP	Overarching Construction Contaminated Land Management Sub-plan
OCEMP	Overarching Construction Environmental Management Plan
OCFFMP	Overarching Construction Flora and Fauna Management Sub-plan
OCFMP	Overarching Construction Flood Management Sub-plan
OCS	Overarching Communication Strategy
CNVMP	Overarching Construction Noise and Vibration Management Sub-plan
OOHW	Out-of-hours work
Operational footprint	Generally includes the M12 Motorway and additional areas required for operation and maintenance of the Project.
CSWMP	Overarching Construction Soil and Water Management Sub-plan
CTTMP	Overarching Construction Transport and Traffic Management Sub-plan
CWRMP	Overarching Construction Waste and Resource Management Sub-plan
PDLP	Place, Design and Landscape Plan
PIRMP	Pollution Incident Response Management Plan
Planning Secretary	Secretary of the NSW Department of Infrastructure, Planning and Environment, or delegate
Primary CoA/REMM	CoA that are specific to the development of this Plan
POEO Act	<i>Protection of the Environment Operations Act 1997 (NSW)</i>

Abbreviation	Expanded text
Pollution	Pollution (including air pollution, water pollution, noise pollution and land pollution) as defined in the dictionary to the POEO Act
Pollution incident	Has the same meaning as defined in the dictionary to the POEO Act.
Project, the	M12 Motorway Project
QA	Quality Assurance
RAP	Registered Aboriginal Party
Regulatory action	Any formal regulatory response from an environmental regulator including but not limited to penalty notices, clean-up notices, prevention notices, official cautions, show cause notices and formal warnings.
REMM	Revised Environmental Management Measures
Report-only event	An environmental incident or unexpected find resulting from circumstances outside the scope of controls and of an activity.
Roads and Maritime (RMS)	Former Roads and Maritime, now Transport for New South Wales
ROL	Road Occupancy Licence
SAP	Sensitive Area Plan
SEAR's	Secretary's Environmental Assessment Requirements
Secondary CoA/ REMM	CoA that are related to, but not specific to, the development of this Plan
SEMP	Site Establishment Management Plan
Significant incident	An environmental incident that is likely to receive a classification of C3, C2 or C1, OR the history of the project, past performance and/or previous regulatory interest, indicate the project is likely to receive a penalty notice or be subject to prosecution, and therefore requires escalation to the Secretary and other TfNSW senior management.
TECs	Threatened Ecological Communities
TfNSW	Transport for New South Wales (formerly Roads and Maritime Services)
TSC Act	<i>Threatened Species Conservation Act 1995</i> (NSW) (repealed) but relevant for this assessment due to being assessed under the Biodiversity Conservation Transitional arrangements.
Unexpected find	An unexpected discovery such as a heritage item, threatened species, contamination, asbestos or hazardous substance.
Work	Any physical work to build or facilitate the building of the CSSI, including low impact work, environmental management measures and utility works. However, it does not include activities that inform or enable detailed design of the CSSI and generate noise that is no more than 5 dB(A) above the rating background level at any sensitive receiver.
WSA Co	Western Sydney Airport Corporation
WSP	Western Sydney Parklands

Abbreviation	Expanded text
WSIA	Western Sydney International Airport
WSIP	Western Sydney Infrastructure Plan

# 1 Introduction

## 1.1 Context

This Construction Environmental Management Plan (CEMP or Plan) has been prepared for the M12 Motorway – Central package (M12 Central package).

This CEMP has been prepared under the Overarching Construction Environmental Management Plan (OCEMP) and relevant sub-plans developed for M12 Motorway (the Project), to address the requirements of the Minister's Conditions of Approval (CoA) SSI-9364, the Revised Environmental Management Measures (REMMs) listed in the M12 Motorway Environmental Impact Statement (EIS) (October, 2019), Submissions Report (October 2020), Amendment Report (October 2020), Amendment Report Submissions Report (ARSR) (December 2020), ARSR Amendment (March, 2021), all applicable legislation, and the Transport for New South Wales (TfNSW) Specifications.

## 1.2 Background

### 1.2.1 M12 Motorway (the Project)

Transport for New South Wales (TfNSW) is planning to construct and operate the M12 Motorway (the Project) to provide direct access between the Western Sydney International Airport (WSIA) at Badgerys Creek and Sydney's motorway network. The M12 Motorway will run between the M7 Motorway at Cecil Hills and The Northern Road at Luddenham for about 16 kilometres (km) and is expected to be opened to traffic prior to opening of the WSIA.

Key features of the Project include:

- An east-west 16 km motorway between the M7 Motorway, Cecil Hills and The Northern Road, Luddenham
- A motorway built for four lanes (with provision for up to six lanes) with a median to separate opposing traffic flows
- A direct connection to Western Sydney International Airport
- A new connection to The Northern Road with traffic lights
- A motorway-to-motorway interchange at the M7 Motorway
- Provision for a future interchange connecting Mamre Road and Devonshire Road at the M12 Motorway.

A detailed Project description is provided in Section 2.1.



### 1.2.2 Statutory Context

The Project is subject to an approval under Division 5.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as Critical State Significant Infrastructure (CSSI) (SSI-9364). The Project is also a controlled action under Section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), requiring a separate approval from the Australian Minister for the Environment.

An Environmental Impact Statement (EIS) was prepared to describe and assess the environmental impacts associated with the Project and provide recommend management measures to address the identified impacts. The EIS was exhibited by the NSW Department of Planning and Environment (DPE; now the NSW Department of Planning, Housing and Infrastructure (DPHI) and the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)) for 34 days from 16 October 2019 to 18 November 2019 to give the community and stakeholders the opportunity to provide comment.

In accordance with Section 5.17 of the EP&A Act, the Secretary requested TfNSW to provide a Response to Submissions report on 29 November 2019. These were addressed within the Submissions Report. Due to design developments since the exhibition of the EIS, an Amendment Report (AR) was prepared to assess the impacts of these amendments. The AR was exhibited by DPE for 14 days from 21 October 2020 to 4 November 2020. Following exhibition of the AR, an Amendment Report Submissions Report (ARSR) was prepared in December 2020 to address the identified issues, followed by the ARSR Amendment prepared in March 2021 which addressed biodiversity matters only.

The following additional assessments have since been undertaken:

- Two Consistency Assessments (CA) for M12 West and Central addressing detailed design changes for the Project construction boundary approved in October 2021
- Sydney Water Consistency Assessment related to construction boundary extensions associated with Sydney Water utility crossings; approved in June 2022
- Design Boundary Change Consistency Assessment related to design boundary changes within the M12 alignment. This required an extension of the construction footprint and operational footprint, property adjustments and the demolition of Building No.1 at McMasters Field Station; approved in July 2022. Threatened Species Surveys were also undertaken along the M12 alignment between September and December 2021 to satisfy the NSW Conditions of Approval (CoA) E4, E5 and E6; the outcomes of which captured within the Design CA.
- Minor Consistency Assessment (M12 Central) required amendments to the construction footprint as a result of utility adjustments and tie in works, property adjustments for flood alleviation and improvements to ancillary facility access due to safety concerns, temporary widening of Elizabeth Drive and signage installation; approved in August 2022.
- Devonshire Road Temporary Roundabout Consistency Assessment required to address the requirements of REMM TT10. This has resulted in an increase to the construction footprint at the Elizabeth Drive and Devonshire Road intersection to allow for the construction of a temporary roundabout; approved in September 2023.
- Elizabeth Drive Connections Consistency Assessment addressed detailed design changes for the Elizabeth Drive Connections. This involved minor construction and operation boundary adjustments, design changes, new sediment basin locations, utility works, property access changes and property adjustments; approved in September 2023.

- M12 West Minor Consistency Assessment for the demolition of structures as 752 Luddenham Road required to address the need for the demolition of structures within Ancillary Facility 11. Whilst this ancillary facility is already located within the construction footprint and was previously assessed in the M12 Motorway Amendment Report, the demolition and disposal of structures in this location required assessment; approved in September 2023.
- M12 East AF9 Power Supply Minor Consistency Assessment required to address a minor temporary amendment to the construction footprint in order to provide permanent site power to the construction ancillary facility 9 (AF9); approved in October 2023.
- M12 East Cecil Road Laydown Area Minor Consistency Assessment required to address temporary amendment to the construction boundary to facilitate the installation of a DN150 Steel Secondary Gas main within Cecil Road; approved in October 2023.
- M12 East Temporary Construction Signage Minor Consistency Assessment required to address temporary traffic signage installed prior to the start of temporary barriers on the M7 Motorway; approved in October 2023.
- M12 East Sites 48, 50 and 51 Boundary Changes Minor Consistency Assessment addressed the required amendments to the construction footprint in three locations as a result of temporary traffic control measures, pavement build up and resurfacing; approved in December 2023.
- M12 Central Water Tower Access Road Minor Consistency Assessment addressed changes to the construction boundary to facilitate the construction of concrete slabs over the Sydney Water main, the construction of a temporary access road to the existing water town and radar tower, and the subsequent reinstatement of this temporary access road to pre-construction conditions; approved in January 2024.

The Project must be carried out generally in accordance with the EIS, Submissions Report, AR, ARSR and the ARSR - Amendment, M12 West and Central CA, Sydney Water CA, Design Boundary Change CA, Minor CA, Devonshire Road Temporary Roundabout CA, Elizabeth Drive Connections CA, M12 West Demolition of Structures as 752 Luddenham Road CA, M12 East AF9 Power Supply CA, M12 East Cecil Road Laydown Area CA, M12 East Temporary Construction Signage CA, M12 East Sites 48, 50 and 51 CA and M12 Central Water Tower Access Road CA in accordance with NSW CoA A1.

. These documents are collectively referred to as the Environmental Assessment Documentation (EAD). The CSSI must also be carried out in accordance with all procedures, commitments, preventative actions, performance outcomes and mitigation measures set out in the EAD as required by NSW CoA A2.

Approval for the Project under the EP&A Act was granted by the Minister for Planning on 23 April 2021. Approval for the Project under the EPBC Act was granted by the Federal Minister for the Environment on 3 June 2021. The Project must be carried out in accordance with the terms of the NSW and Federal Approvals.

Additionally, the M12 East Stage is being delivered as part of the M7-M12 Integration Project which includes the M7 Motorway Widening Project (MOD 6 Widening (SSI-663-MOD 6)) (referred to herein as M7 Widening) delivered by Western Sydney Orbital Company (WSO Co). Additional assessments were undertaken as a part of the EAD for this project.



### 1.2.3 M12 Motorway Delivery Strategy

The Project will be constructed in separate stages under separate construction contracts (or works packages):

- **M12 West** – between The Northern Road, Luddenham and about 250 metres east of Badgerys Creek
- **M12 Central** (the subject of this Plan) – between about 500 metres west of South Creek and the Western Sydney Parklands at Duff Road, Cecil Park
- **M12 East** – (as part of the M7/M12 Integration Project)
  - Elizabeth Drive Connections (EDC) – a two-kilometre section from Duff Road to about 300 metres east of the M7 Motorway
  - M7/M12 Interchange – An interchange between the M12 Motorway and M7 Motorway and tie-in works for approximately four kilometres on the M7 Motorway

Each package of work is to be delivered under separate contracts on behalf of the proponent TfNSW. While the packages will commence at different times there will be periods during which the packages works will overlap.

Co-ordination between Seymour Whyte and other contractors will be required to manage cumulative impacts. Further details on the management of cumulative impacts, including between the other Project packages is provided in Section 2.6 and Section 5.5.3.

Further detail of the Project staging is provided in the Project Staging Report, which has been prepared by TfNSW in accordance with NSW CoA A13. In accordance with NSW CoA A11, the CSSI (the Project) must be staged in accordance with the Project Staging Report.

### 1.2.4 M12 Central

Seymour Whyte has been engaged to deliver the M12 Central package. Construction of the M12 Central package involves building 7.5 km of motorway from west of Badgerys Creek to the Water Tower Access Road within Western Sydney Parklands.

The M12 Central package will provide a dual carriageway with a wide median to allow for future widening to six lanes. Safety barriers will be provided along the length of the package. Emergency stopping bays and emergency crossovers will also be provided at regular intervals. A shared user path with lighting will provide an active transport link along the motorway and eastward to the M7.

The M12 Central package includes the following bridges:

- Twin bridges over South Creek
- A bridge for Clifton Avenue over the M12 Motorway
- Twin bridges over Kemps Creek
- Twin bridges over Elizabeth Drive near Mamre Road
- Twin Bridges over Range Road
- A bridge for the Water Tower Access Road over the M12 Motorway
- A private property access bridge in University of Sydney land.

Retaining walls will be provided around Range Road to help limit Project impacts on Range Road. Adjustments will be made to local roads including Clifton Avenue and Salisbury Road.

The M12 Central package also requires relocation of utility services including electricity, water and telecommunications. Urban design features of this package include Aboriginal artwork on bridges, rest areas on shared user paths, interpretive signage and landscape planting.

A detailed description of the M12 Central package is provided in Section 2.3.

### **1.2.5 Overarching Construction Environmental Management Plan**

To provide a consistent management approach to the delivery of the Project, TfNSW have developed an Overarching Construction Environmental Management Plan (OCEMP) and associated Sub-plans to ensure that TfNSW and its Construction Contractors establish and maintain best practice controls to manage potential environmental impacts during construction.

The OCEMP has been developed to address the NSW and Commonwealth conditions of approval and the management measures presented in the Environmental Assessment Documentation. The OCEMP includes general requirements for implementation, monitoring and auditing which will be applied to, and further developed in, each of the stage-specific Construction Contractor CEMPs prepared under the OCEMP.

The OCEMP was initially approved by the Planning Secretary under NSW CoA C3, C9 and C15 on 21 December 2021, and will be subject to future revisions as described in the OCEMP. If changes to the OCEMP are identified, TfNSW will write to Seymour Whyte directing that this CEMP is to be updated to reflect the changes in the OCEMP.

## **1.3 Purpose of this CEMP**

The purpose of this Construction Environmental Management Plan (CEMP or Plan) and associated Sub-plans is to describe how Seymour Whyte will manage potential environmental and community impacts during construction of the M12 Central package.

This Plan has been prepared under and consistent with the OCEMP, to outline and describe how the NSW Minister for Planning's CoA and the Federal Minister for the Environment's CoA will be complied with during the construction of the M12 Central package. The CEMP addresses the requirements of the EAD including incorporating the relevant Revised Environmental Mitigation Measures (REMMs).

The CEMP is consistent with:

- The OCEMP
- NSW Minister's Infrastructure Approval dated 23 April 2021
- Federal Minister for the Environment Approval dated 3 June 2021
- Environmental Assessment Documentation
- TfNSW Specifications
- TfNSW Guidelines

- Environmental Management Plan Guideline – Guideline for Infrastructure Projects (DPE, 2020)
- AS/NZS ISO 14001: Environmental Management Systems (EMS)
- ISO 9001: Quality Management Systems
- AS/NZS 4801: Safety Management Systems.

This CEMP provides a structured approach to the management and minimisation of environmental risks and issues during construction of the M12 Central package. This Plan is the overarching document in the Environmental Management System for the M12 Central package, and includes a number of Sub-plans, protocols and procedures, developed to outline the requirements, controls and management methods that will be implemented during construction.

The CEMP and associated Sub-plans must be consistent with the OCEMP and be approved by the Independent Environmental Representative (ER) for the Project, prior to the commencement of construction of the M12 Central package.

## 1.4 Conditions of Approval

This CEMP provides a consistent approach to address the requirements of both the State and Federal approvals in a single document. The requirements of the State conditions relevant to the development of this CEMP are shown in Table 1-1. These are defined as primary CoA and specifically relate to the development of the CEMP. Secondary CoA relevant to, but not specific to the development of this Plan, have been listed in Appendix A1. A cross reference is also included to indicate where the CoA is addressed in this Plan or other Project management document.

If a proposed action has the potential to significantly impact on Matters of National Environmental Significance (MNES) or the environment of Commonwealth land it must be referred to the Australian Minister for the Environment. As the Project has potential to significantly impact on listed threatened species of communities (Section 18 and Section 18A of the EPBC Act) the Project is considered a controlled action under the EPBC Act and is therefore subject to Commonwealth CoA's. The requirements of the Commonwealth CoA and where they are met in this CEMP is shown in Table 1-2.

Table 1-1: NSW CoA relevant to the CEMP

No.	Requirement	Plan Reference
C1	A Construction Environmental Management Plan (CEMP) must be prepared having regard to the Environmental Management Plan Guideline for Infrastructure Projects (Department Planning, Industry and Environment, 2020). The CEMP must detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.	The OCEMP This CEMP Section 1.3 Appendix A9
C2	The CEMP must provide: (a) a description of activities to be undertaken during construction (including the scheduling of construction);	Section 2 Table 2-1 Table 2-2
	(b) details of environmental policies, guidelines and principles to be followed in the construction of the CSSI;	Section 3.2

No.	Requirement	Plan Reference
		Section 3.3 Section 4.2 Appendix A3
	(c) a program for ongoing analysis of the key environmental risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of the CSSI;	Section 4.1.2 Appendix A2
	(d) details of how the activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1; and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition;	Section 4.3 Appendix A2 Sub-plans
	(e) an inspection program detailing the activities to be inspected and frequency of inspections;	Section 7.1 Sub-plans
	(f) a protocol for managing and reporting any: (i) incidents; and (ii) non-compliances with this approval or statutory requirements;	Section 6 Section 7.3 Appendix A7
	(g) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction;	Section 7.3.6
	(h) a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C5. Where staged construction of the CSSI is proposed, the CEMP must also identify which CEMP Sub-plan applies to each of the proposed stages of construction;	Section 3.3 Project Staging Report
	(i) a description of the roles and environmental responsibilities for relevant employees and their relationship with the ER;	Section 5.1
	(j) for training and induction for employees, including Construction Contractors and sub-contractors, in relation to environmental and compliance obligations under the terms of this approval; and	Section 5.3
	(k) for periodic review and update of the CEMP and all associated plans and programs.	Section 1.12 Section 7.7
	(l) the outcomes of consultation with government agencies in accordance with Condition A5.	Section 1.10 OCEMP Sub-plans
C3	The CEMP must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction, or where construction is staged no later than one (1) month before the commencement of that stage.	OCEMP

No.	Requirement	Plan Reference
C4	The following CEMP Sub-plans must be prepared in consultation with the relevant government and other agencies identified for each CEMP Sub-plan. Details of all information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant CEMP Sub-plan, including copies of all correspondence from those agencies as required by Condition A5.	OCEMP and Sub-plans
	(a) Traffic and Transport - Relevant Council(s)	Appendix B1
	(b) Noise and vibration - WaterNSW, Sydney Water and pipeline operators (where vibration generating activities will impact on their assets) and relevant council(s)	Appendix B2
	(c) Flora and Fauna - DPI Fisheries, EES <sup>1</sup> , DAWE <sup>2</sup> and relevant council(s)	Appendix B3
	(d) Soils and contamination - DPE Water, WaterNSW and relevant council(s)	Appendix B4 Appendix B5
	(e) Surface water and groundwater - DPE Water, WaterNSW and Sydney Water (if there are discharges to its assets) and relevant council(s)	Appendix B4
	(f) Heritage (including Aboriginal and non-Aboriginal Heritage) - Heritage Council of NSW, Heritage NSW, WaterNSW and relevant council(s)	Appendix B6
	(g) Air Quality and Odour - Relevant Council(s)	Appendix B7
C9	Any of the CEMP Sub-plans may be submitted to the Planning Secretary for approval along with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before the commencement of construction.	OCEMP
C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved, unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER must be implemented for the duration of construction. Where construction of the CSSI is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been endorsed by the ER and approved by the Planning Secretary.	Section 1.11

<sup>1</sup>Former Environment, Energy and Science Group, now Environment and Heritage Group

<sup>2</sup>Former Commonwealth Department of Agriculture, Water and Environment, now Department of Climate Change Energy Environment and Water.

Table 1-2: Commonwealth CoA relevant to the CEMP

No.	Requirement	Plan Reference
6	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	OCEMP Section 1.10
8	The approval holder must maintain accurate and complete compliance records.	Section 7.3.4

No.	Requirement	Plan Reference
9	<p>If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.</p> <p>Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.</p>	Section 7.3.4
10	<p>The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ul style="list-style-type: none"> <li>(a) publish each compliance report on the website within 60 business days following the relevant 12 month period;</li> <li>(b) notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication;</li> <li>(c) keep all compliance reports publicly available on the website until this approval expires or as otherwise agreed by the Department in writing;</li> <li>(d) exclude or redact sensitive ecological data from compliance reports published on the website; and</li> <li>(e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.</li> </ul> <p>Note: Compliance reports may be published on the Department's website.</p>	Section 7.3.4
11	<p>The approval holder must notify the Department in writing of any: incident affecting protected matters; non-compliance with the conditions; or non-compliance with the commitments made in plans required in accordance with conditions 5a or 5b. The notification must be given as soon as practicable, and no later than 2 business days after becoming aware of the incident affecting protected matters or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> <li>(a) any condition which is or may be in breach</li> <li>(b) a short description of the incident affecting protected matters and/or non-compliance</li> <li>(c) the location (including co-ordinates), date, and time of the incident affecting protected matters and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.</li> </ul>	Section 7.3.1 Appendix A7

No.	Requirement	Plan Reference
12	<p>The approval holder must provide to the Department the details of any incident affecting protected matters or non-compliance with the conditions or commitments made in plans required in accordance with conditions 5a or 5b as soon as practicable and no later than 10 business days after becoming aware of the incident affecting protected matters or non-compliance, specifying:</p> <ul style="list-style-type: none"> <li>(a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</li> <li>(b) the potential impacts of the incident affecting protected matters or non-compliance; and</li> <li>(c) the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>	<p>Section 7.3.1 Appendix A7</p>
13	<p>The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.</p>	<p>Section 7.4.1</p>
14	<p>For each independent audit requested by the Minister under condition 13, the approval holder must:</p> <ul style="list-style-type: none"> <li>(a) provide the name and qualifications of the independent auditor and the draft audit criteria to the Department</li> <li>(b) only commence the independent audit once the audit criteria have been approved in writing by the Department</li> <li>(c) submit an audit report to the Department within the timeframe specified in the approved audit criteria.</li> </ul>	<p>Section 7.4.1</p>
15	<p>The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval, or as otherwise agreed by the Department in writing.</p>	<p>Section 7.4.1</p>
16	<p>The approval holder must:</p> <ul style="list-style-type: none"> <li>(a) submit plans electronically to the Department for information;</li> <li>(b) unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date: <ul style="list-style-type: none"> <li>i. that the plan was approved under the State Infrastructure approval, if the plan requires approval under the State Infrastructure approval; or</li> <li>ii. that the plan was finalised and provided to the NSW Planning Secretary, if the plan is required for information under the State Infrastructure approval.</li> </ul> </li> <li>(c) exclude or redact sensitive ecological data from plans that are to be published on the website or provided to a member of the public; and</li> <li>(d) keep plans published on the website for the period for which this approval has effect, or as otherwise agreed by the Department in writing.</li> </ul>	<p>OCEMP Section 1.11</p>



## 1.5 Revised Environmental Management Measures

The primary requirements of the Revised Environmental Management Measures (REMM) presented in the EAD relevant to the development of this CEMP are shown in Table 1-3. Secondary REMMs not specifically related, but relevant to this Plan and have been listed in Appendix A1. A cross reference is also included to indicate where the REMM is addressed in this Plan for other Project management documents.

Table 1-3: Primary REMMs relevant to the development of this Plan

REMM	Measure/Requirement	Timing	Plan Reference
G02	A CEMP will be prepared and implemented for the project in accordance with the Department of Infrastructure, Planning and Natural Resources Guideline for the Preparation of Environmental Management Plans (DIPNR 2004), for the ongoing management of environmental issues during construction of the project.	Prior to construction and during construction	This CEMP
TT01	<p>A construction transport and traffic management plan (CTTMP) will be prepared as part of the CEMP in consultation with relevant local Councils, and in accordance with relevant guidelines. The CTTMP will outline:</p> <ul style="list-style-type: none"> <li>• Staging and planning of works to minimise the need to occupy roads where practicable, including identification of haulage routes</li> <li>• Safe alternative routes for pedestrians and cyclists in accordance with relevant safety and accessibility standards</li> <li>• The requirements for traffic control plans to be prepared for each work area which will include details of site access and specific traffic control measures (including signage) to manage traffic movements</li> <li>• Road safety audit requirements</li> <li>• Parking arrangements for construction staff</li> <li>• Identification of access arrangements at construction sites detailing vehicle access movements</li> <li>• Measures to minimise changes to the existing road network, property access, bus stops and pedestrian/cyclist facilities where feasible</li> <li>• Measures to communicate and notify of any changes in traffic conditions on roads or paths to road users, emergency services, public transport operators, and other relevant stakeholders</li> </ul>	Prior to construction	Appendix B1



REMM	Measure/Requirement	Timing	Plan Reference
	<ul style="list-style-type: none"> <li>Measures to manage construction traffic interfaces and access arrangements with WSIA and Sydney Metro – Western Sydney Airport</li> </ul> <p>Requirements for appropriate warning and signage for traffic and other road users such as cyclists and pedestrians in the vicinity of work areas and work site access, and road diversions.</p>		
B19	Emergency response protocols and procedures will be included in the Project CEMP and implemented in the event of a contaminant spill or leak.	During construction	Section 6.4.2 Appendix A9
NAH01	<p>A construction cultural heritage management plan (CCHMP) will be prepared for the project as part of the CEMP in consultation with DPC (Heritage). The CCHMP will include as a minimum:</p> <ul style="list-style-type: none"> <li>A list, plan and maps with GIS layers showing the location of identified heritage items both within, and near, the construction footprint</li> <li>A significance assessment and statement of significance for each item</li> <li>Protocols and procedures including inductions and toolbox talks for all contractors and subcontractors working in the area to be informed of all exclusion zones, the elements and their significance, to prevent accidental damage or encroachment</li> <li>Protocols and procedures to be implemented during construction to avoid or minimise impacts on items of heritage significance including protective fencing</li> <li>The TfNSW Unexpected Heritage Items Procedure (Roads and Maritime, 2015) which would be followed in the event that unexpected heritage finds are uncovered during construction.</li> </ul>	Prior to construction	Appendix B6

REMM	Measure/Requirement	Timing	Plan Reference
AQ01	<p>A Construction Air Quality Management Sub-plan (CAQMP) will be developed and implemented as part of the CEMP to manage potential air quality impacts associated with construction. The CAQMP will identify activities that may results in air quality impacts and associated mitigation measures to avoid or minimise these impacts. The CAQMP will provide:</p> <ul style="list-style-type: none"> <li>Measures to minimise dust generation associated with earthworks and other activities that disturb the ground surface, stockpiles, and haulage routes</li> <li>Measures to minimise emissions from machinery and vehicles associated with the project</li> <li>Procedures for inspection, monitoring and addressing any impacts where required.</li> <li>The CAQMP will be implemented for the duration of construction.</li> </ul>	Prior to construction	Appendix B7
F03	<p>A flood management plan will be prepared as part of the CEMP for the project and will detail the processes for flood preparedness, materials management, weather monitoring, site management and flood incident management. The flood management plan will be developed in accordance with:</p> <ul style="list-style-type: none"> <li>Managing Urban Stormwater, Soils and Construction, Volume 1 4th Edition, March 2004 (Landcom 2004) and Managing Urban Stormwater, Volume 2D – Main Road Construction (DECC 2008)</li> <li>TfNSW Erosion and Sedimentation Management Procedure (Roads and Traffic Authority 2009)</li> <li>TfNSW Technical Guideline: Temporary Stormwater Drainage for Road Construction (Roads and Maritime 2011)</li> <li>TfNSW Stockpile Management Guideline (Roads and Maritime 2011).</li> </ul>	Prior to construction	Appendix B8
W01	<p>A construction waste and resource management plan (CWRMP) will be prepared for the project and outline appropriate management procedures. It will include, but not be limited to:</p> <ul style="list-style-type: none"> <li>Identification of the waste types and volumes that are likely to be generated by the project</li> </ul>	Prior to construction	Appendix B9

REMM	Measure/Requirement	Timing	Plan Reference
	<ul style="list-style-type: none"> <li>Adherence to the waste minimisation hierarchy principles of avoid/reduce/reuse/recycle/dispose</li> <li>Waste management procedures to manage the handling and disposal of waste, including unsuitable material or unexpected waste volumes</li> <li>Identification of reporting requirements and procedures for tracking of waste types and quantities</li> <li>A resource management strategy detailing the process to identify reuse options for surplus materials</li> <li>A procurement strategy to minimise unnecessary consumption of materials and waste generation in accordance with relevant legislation and guidelines.</li> </ul>		
AH01	<p>A construction cultural heritage management plan (CCHMP) will be developed for the project in consultation with the project RAPs and EESG. The CCHMP will include:</p> <ul style="list-style-type: none"> <li>An unexpected finds procedure for the discovery of Aboriginal ancestral remains, Aboriginal objects or new Aboriginal sites consistent with TfNSW Standard Management Procedure Unexpected Heritage Items (Roads and Maritime, 2015). This procedure will also outline requirements to manage unexpected human remains finds in accordance with NSW statutory requirements, and relevant guidelines and standards prepared by EESG. The Procedure will outline the process for consulting with the RAPs in the event that previously unidentified Aboriginal heritage is discovered.</li> <li>Procedures for the management and curation of salvaged Aboriginal objects</li> <li>Detailed locations and installation procedures for fencing and protective coverings</li> <li>Details of permissible activities inside protected Aboriginal areas</li> <li>Details of permissible activities inside protected Aboriginal areas</li> </ul>	Prior to construction	Appendix B6

REMM	Measure/Requirement	Timing	Plan Reference
	<ul style="list-style-type: none"> <li>Procedures for consideration of heritage aspects within site inductions and toolbox talks for construction workers and supervisors.</li> </ul>		
NV01	A construction noise and vibration management plan (CNVMP) will be prepared for the project to mitigate and manage noise and vibration impacts during construction. The CNVMP will be implemented for the duration of construction of the project and will: ...	Prior to construction	Appendix B2
B01	<p>A CFFMP will be prepared. The measures in the CFFMP will include:</p> <ul style="list-style-type: none"> <li>Identify nearby sensitive receivers</li> <li>Include a description of the construction activities equipment and working hours</li> <li>Identify relevant noise and vibration performance criteria for the project and license and approval conditions.</li> <li>Include modelling results showing construction noise impacts based on detailed design information</li> <li>Outline standard and additional mitigation measures from the Construction Noise and Vibration Guideline (CNVG) (Roads and Maritime 2016) and information about when each will be applied</li> <li>Outline requirements for the development and implementation of an Out-of-hours Work Protocol</li> <li>Outline requirements for noise and vibration monitoring that will be carried out to monitor project performance associated with the noise and vibration criteria</li> <li>Describe community consultation and complaints handling procedures in accordance with the Community Communication Strategy to be developed for the project</li> <li>Outline measures to manage noise impacts associated with heavy vehicle movements both on and offsite</li> <li>Outline measures to minimise cumulative construction impacts and the likelihood for 'construction fatigue' from concurrent and consecutive projects in the area</li> </ul>	Prior to construction	Appendix B3

REMM	Measure/Requirement	Timing	Plan Reference
	<ul style="list-style-type: none"> <li>Outline requirements to minimise and manage construction fatigue, in consultation with the community.</li> </ul>		
B01	<p>A CFFMP will be prepared. The measures in the CFFMP will include:</p> <ul style="list-style-type: none"> <li>A site specific induction</li> <li>Identification of clearing limits and exclusion fencing</li> <li>Pre-clearance surveys</li> <li>Vegetation clearing procedures</li> <li>An unexpected finds procedure</li> <li>Procedures for weed management and monitoring</li> <li>A process for de-watering farm dams and the relocation of aquatic fauna</li> <li>Provision of supplementary fauna habitat (eg nest boxes).</li> </ul>	Prior to construction	Appendix B3
SWH01	<p>A construction soil and water management plan (CSWMP) will be prepared for the project. The plan will outline measures to manage soil and water impacts associated with the construction works, including contaminated land. The CSWMP will provide:</p> <ul style="list-style-type: none"> <li>Measures to minimise/manage erosion and sediment transport both within the construction footprint and offsite including requirements for the preparation of erosion and sediment control plans (ESCP) for all progressive stages of construction</li> <li>Measures to manage waste including the classification and handling of spoil</li> <li>Procedures to manage unexpected contaminated finds including asbestos which would be outlined in the contaminated land management plan and asbestos management plan to be prepared for the project</li> <li>Measures to manage stockpiles including locations, separation of waste types, sediment controls and stabilisation</li> <li>Measures to manage groundwater de-watering and impacts including mitigation required</li> </ul>	Prior to construction	Appendix B4

REMM	Measure/Requirement	Timing	Plan Reference
	<ul style="list-style-type: none"> <li>Processes for de-watering of water that has accumulated on site and from sediment basins, including relevant discharge criteria</li> <li>Measures to manage potential tannin leachate</li> <li>Measures to manage accidental spills including the requirement to maintain materials such as spill kits</li> <li>Measures to manage potential saline soils</li> <li>Details of surface water and groundwater quality monitoring to be carried out before, throughout, and following construction</li> <li>Controls for sensitive receiving environments including SEPP Coastal Wetlands which may include but not be limited to: <ul style="list-style-type: none"> <li>Designation of 'no go' zones for construction plant and equipment</li> <li>Creation of catch/diversion drains and sediment fences at the downstream boundary of construction activities where practicable to ensure containment of sediment-laden runoff and diversion toward sediment sump treatment areas (not sediment basins) to prevent flow of runoff to the SEPP Coastal Wetland.</li> </ul> </li> <li>Erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 (Landcom 2004) and Volume 2D (NSW Department of Environment, Climate Change and Water 2008), commonly referred to as the "Blue Book", as well as relevant TfNSW Guidelines.</li> </ul>		
SC03	<p>A contaminated land management plan (CLMP) will be prepared for the project. The CLMP will include:</p> <ul style="list-style-type: none"> <li>Control measures to manage identified areas of contamination, including surface soils in the vicinity of TP303, TP304, TP310 and TP311 containing heavy metal and PAH concentrations</li> <li>Procedures for unexpected contamination</li> <li>Measures to manage potential ASS (as required based on testing results) within</li> </ul>	Prior to construction	Appendix B5

REMM	Measure/Requirement	Timing	Plan Reference
	<p>sediments of the creeks in the construction footprint to minimise impacts to the environment</p> <ul style="list-style-type: none"> <li>Requirements for excavation of unexpected contaminants to be carried out in consultation with project Remedial Actions Plans.</li> </ul>		

## 1.6 Environment Protection Licence

The M12 Central package is subject to Environment Protection Licence (EPL) No. 21596 as a Scheduled Activity for 'road construction'. The EPL includes clauses requiring the licensee to minimise the emission of pollution from the premises. The M12 Central package will be constructed to meet the requirements of the EPL.

## 1.7 TfNSW Specifications

The TfNSW Specifications set out the minimum requirements for the detailed outcomes in terms of quality or performance expected in the finished product for construction projects and are relevant to various construction activities on work sites to minimise impacts to the environment.

This CEMP and Sub-plans incorporate the relevant requirements from the TfNSW Specifications prepared for the *M12 Motorway (Central), Construction between Badgerys Creek and the Water Tower Access Road, Cecil Hills* including:

- G01 – Job Specific Requirements
- G04 – Principal's Project Accommodation
- G10 – Traffic Management
- G36 – Environmental Protection
- G38 – Soil and Water Management
- G40 – Clearing and Grubbing
- R44 – Earthworks
- R178 – Vegetation
- R179 – Landscape Planting
- R201 – Fencing
- R272 – Automatic Weather Stations.

The specifications set out environmental protection requirements, including Hold Points and Witness Points that must be complied with during construction of the M12 Central package. A Hold Point is a point beyond which a work process must not proceed without express written authorisation from TfNSW. Witness Points are an identified point in the process where TfNSW request to, review, witness, inspect method and/or process of work. The activities, however, may

proceed. For processes under the CEMP, the request for release of Hold Points and Witness Points is to be made through the TfNSW ESM (or delegate).

Details of the Hold Points and Witness Points relevant to this Plan are outlined in Section 7.6.3.

## 1.8 Scope of the CEMP

This CEMP provides:

- A description of activities to be undertaken during construction
- Details of environmental policies, guidelines and principles to be followed in the construction of the M12 Central package
- A schedule for compliance auditing
- A program for analysis of the key environmental risks arising from the construction of the Project
- Details of how construction will meet the performance outcomes stated in the Environmental Assessment Documentation and to manage the identified risks
- An inspection program detailing the activities to be inspected and frequency of inspections
- A protocol for managing and reporting any incidents and non-compliances with the NSW and Federal approvals and with statutory requirements
- Procedures for rectifying non-compliances during compliance auditing, incident management or at any time during construction
- A list of the Sub-plans prepared under this CEMP
- A description of the roles and environmental responsibilities for Seymour Whyte, TfNSW, and their relationship with the independent Environmental Representative (ER)
- Details of training, inductions and awareness programs for construction personnel working on the Project, in relation to environmental and compliance obligations
- A mechanism for periodic review and update of the OCEMP and associated plans and programs, ensuring continual improvement.

This Plan is applicable to all activities during construction of the M12 Central package, including all areas where physical works will occur or areas that may be otherwise impacted by the construction works, and under the control of Seymour Whyte. All Seymour Whyte staff and sub-contractors are required to operate fully under the requirements of this Plan and related environmental management plans, over the full duration of the construction program.

For work outside the Works Under Contract (WUC), Seymour Whyte may be required to work under a separate contractor's Environmental Management Plan (EMP). In such instances works will be undertaken in accordance with the requirements of the relevant EMP.

A copy of this Plan will be kept on the premises for the duration of construction and available to sub-contractors.

## 1.9 Sustainability

Seymour Whyte and TfNSW place a high importance on ensuring key sustainability outcomes are achieved in the delivery of the M12 Central package. Addressing sustainability requirements will be



an ongoing process throughout the project life cycle. The M12 Central package will be delivered to meet the relevant objectives, targets and initiatives outlined in the TfNSW Sustainability Strategy 2019 – 2023 (Roads and Maritime, 2019). Key initiatives from the Strategy that are relevant to the M12 Central package are listed in Table 1-4.

In accordance with NSW CoA E91 a Project Sustainability Strategy will be prepared by TfNSW outlining how the Project will achieve a minimum excellent 'Design' and 'As-built' ISC rating. The M12 Central package will be constructed in accordance with the Project Sustainability Strategy with the aim of achieving a minimum excellent 'As-built' ISC rating as described in the M12 Central Sustainability Management Plan.

Governance, monitoring, reporting and corrective action processes applicable to sustainability are detailed in the environmental management system. Seymour Whyte will meet the applicable ISC credit requirements (these include, but are not limited to, Dis-1, Dis-2, Dis-3, Dis-4, Dis-5, Lan-2, Lan-3, Was-1, Was-2, Her-1, Her-2, Wat-1, Ene-1).

Table 1-4: Key initiatives of Sustainability Strategy 2019 – 2023 relevant to M12 Central package

Focus Area	Key initiative
Energy and carbon management	Educating and raising awareness in employees, contractors and our supply chain regarding the need for increased energy efficiency and reductions in carbon emissions.
	Using solar panels to power roadside signage, alert and messaging systems when cost effective and fit for purpose.
Climate change resilience	Consulting and partnering with key stakeholders to reduce vehicle carbon emissions and supporting new technologies to reduce road transport carbon emissions.
	Minimising the carbon impacts associated with vegetation clearance by reducing project footprints where possible.
Air quality	Actively monitoring and minimising non-road diesel emissions from our activities.
	Ensuring non-road diesel plant and equipment used in our activities comply with relevant EU or US EPA emissions standards.
Resource use and waste management	Identifying where there is potential to recover and reuse materials on site.
	Substituting non-renewable materials with recycled or reused materials where they are fit for purpose, cost effective and affordable.
	Managing waste to minimise transport related risks and impacts by using local disposal facilities where feasible and appropriate
	Maximising the use of non-potable water in preference to potable water where feasible.
Pollution control	Fostering a proactive reporting culture that promotes transparency in managing and reporting incidents internally and with regulators.
	Keeping our roads and waterways clean through litter and debris collection and removal.
Biodiversity	Minimising impacts by applying best practice approaches to unavoidable habitat loss (e.g., following pre-clearing processes, establishing exclusion zones and careful management of weeds and pathogens).
	Avoiding the spread of weeds, pests and diseases outside of our sites through appropriate management of mulch and vegetation wastes generated, reused or removed from our sites.
Sustainable procurement	Where possible, procuring from small and medium-sized enterprises, Aboriginal businesses and Australian disability enterprises by including such requirements in procurement strategies and policies.
	Supporting local suppliers to minimise haulage distances of construction materials when feasible.

## 1.10 Consultation

Consultation with relevant stakeholders and Government agencies, in accordance with the requirements of the NSW CoA, was undertaken as part of the development of the OCEMP, Sub-plans and Construction Monitoring Programs. Where a Sub-plan and/or Monitoring Program required consultation with identified parties, details of the consultation undertaken, matters raised by the parties, and how the matters were addressed are outlined in the applicable overarching Sub-plans including consultation evidence in accordance with NSW CoA C4 and A5. This CEMP, Sub-plans, and Monitoring Programs have been prepared under and consistent with the OCEMP and therefore no further consultation was required as part of the initial preparation of these documents. Consultation may be required with stakeholders and Government agencies if any changes occur to the CEMP, Sub-plan and/or Monitoring Program that would be inconsistent with the compliance outcomes of the OCEMP and would not be considered 'minor' and able to be approved by the ER. In such instances, Seymour Whyte will provide TfNSW with all relevant documents, information and support to allow TfNSW to undertake this consultation.

Ongoing consultation between TfNSW, Seymour Whyte, neighbouring Project packages, other construction projects, stakeholders, the community and relevant agencies stakeholders prior to and during construction to review potential cumulative impacts and to co-ordinate, plan and integrate construction methodologies/ activities (including traffic impacts and dust and noise management), as far as practicable to minimise cumulative impacts. This will include the coordination of respite between the various construction projects where nearby sensitive receivers are likely to experience concurrent construction impacts where feasible.

The approach to community consultation is documented in the Project's Overarching Communication Strategy (OCS) that has been developed in accordance with NSW CoA B1 to B5 and subsequently approved by the Planning Secretary. The process for consultation on the M12 Central package will be consistent with the OCS and as described in the M12 Central Community and Stakeholder Engagement Plan.

## 1.11 CEMP endorsement and approval

This CEMP, Sub-plans and Monitoring Programs will be reviewed by the TfNSW ESM (or delegate) and the ER to confirm they are consistent with, and incorporate, all relevant elements of the approved OCEMP, prior to submission to the Planning Secretary for information.

Construction of the M12 Central package will not commence until the CEMP and Sub-plans are accepted by the ER and provided to the Planning Secretary for information.

## 1.12 Revision

The CEMP (including Sub-plans, Monitoring Programs and EWMS) will be reviewed within one month of any of the below occurrences, or as otherwise agreed with the Planning Secretary:

- At least annually during the senior management review (Table 7-6)
- Following reportable environmental incidents
- On identification of new risks, including risks identified during risk register updates
- When non-compliances are identified

- Following environmental audits that identify matters that require attention
- In response to project change (including consistency assessments and modifications)
- As part of a continuous improvement process.

Should the review process identify any issues or items within the environmental documentation that must be updated, it is the responsibility of the Seymour Whyte Environmental Site Representative (ESR) to update the documentation and then submit to TfNSW for review.

The CEMP (including Sub-plans, Monitoring Programs and EWMS) are to be updated with improved environmental management measures where the original measures are found by Seymour Whyte, TfNSW, ER or a statutory authority, to be not fully effective in achieving the intended environmental outcome, or to address changed or evolving circumstances.

Following endorsement from TfNSW, the updated CEMP documents will be submitted to the ER for review and comment. All submissions to the ER must also be provided to the TfNSW ESM. A minimum 10 working day review period may be required each time the ER is required to review.

The final approved and updated CEMP document(s) will then be submitted to TfNSW for release of the Hold Point, in accordance with TfNSW specification G36, clause 3.1 (Section 7.6.3) at least 10 days prior to the commencement of work not previously addressed by the EMS and CEMP documents (including CEMP, Sub-plans, Monitoring Programs and EWMS) and authorised by earlier Hold Point release by TfNSW, TfNSW may request additional information for including in the CEMP before authorising release of the Hold Point.

Revised versions of the CEMP will be made available through the document control process described in Section 7.6.2 and on the Project website in accordance with NSW CoA B10.

The environmental management system review process described in Section 7.6.3 ensures that environmental documentation is updated as required.

## 2 Project Description

A detailed description of the Project and the M12 Central package is provided in this section. Further details are provided in the Project Staging Report.

### 2.1 M12 Motorway – Project description

#### 2.1.1 Overview

The M12 Motorway (the Project) will provide direct access to Western Sydney International Airport (WSIA) at Badgerys Creek and connect to Sydney's motorway network.

The corridor route is an east-west 16 kilometre motorway between the M7 Motorway, Cecil Hills and The Northern Road, Luddenham. The motorway will provide increased road capacity and reduce congestion and travel times in the future. It will also improve the movement of freight in and through Western Sydney.

The Project forms a key part of the Western Sydney Infrastructure Plan (WSIP). The WSIP is a joint initiative of the Australian and NSW governments to fund a \$4.4 billion road and transport program for Western Sydney and is designed to capitalise on the economic benefits of the Western Sydney Airport as part of an integrated transport solution for the Western Sydney region.

The Project is expected to open by mid-2026.

#### 2.1.2 Key benefits

The key benefits of the Project include:

- Direct access to Western Sydney International Airport at Badgerys Creek from the M7 Motorway and the upgraded The Northern Road
- Improved access to the Western Sydney Aerotropolis and the South West Growth Area
- Increased road capacity for future growth and development
- Improved traffic safety for road users
- Pedestrian and cyclist infrastructure
- Improved freight movement to key commercial centres
- Reduced congestion impact on the community and businesses by providing more capacity.

#### 2.1.3 Project elements

The Project, includes the following key elements:

- A new dual-carriageway motorway between the M7 Motorway and The Northern Road with two lanes in each direction with a central median allowing future expansion to six lanes
- Motorway access via three interchanges/intersections:
  - A motorway-to-motorway interchange at the M7 Motorway and associated works (extending about 4 km within the existing M7 Motorway corridor) with connection between the M12 Motorway and Elizabeth Drive

- A grade-separated interchange referred to as the WSIA interchange, including a dual-carriageway four-lane airport access road (two lanes in each direction for about 1.5 km) connecting with the WSIA Main Access Road
- A signalised intersection at The Northern Road with provision for grade separation in the future
- Bridge structures across Ropes Creek, Kemps Creek, South Creek, Badgerys Creek and Cosgroves Creek, including adjustments of waterways, where required
- A bridge structure across the M12 Motorway into the Western Sydney Parklands to maintain access to the existing water tower and mobile telephone/other service towers on the ridgeline in the vicinity of Cecil Hills, to the west of the M7 Motorway
- Bridge structures at interchanges and at Clifton Avenue, Elizabeth Drive, Luddenham Road and other local roads to maintain local access and connectivity
- Inclusion of active transport (pedestrian and cyclist) facilities through provision of pedestrian bridges and an off-road shared user path, including connections to existing and future shared user path networks
- Modifications to the local road network, as required, to facilitate connections across and around the M12 Motorway, including:
  - Realignment of Elizabeth Drive at the WSIA, with Elizabeth Drive bridging over the airport access road and the future passenger rail line to the airport
  - Two new signalised intersections from Elizabeth Drive into the WSIA, with provisions for future connection to potential developments to the north
  - Widening of Elizabeth Drive under the M7 Motorway and approaches
  - Realignment of Clifton Avenue over the M12 Motorway, with associated adjustments to nearby property access
  - Relocation of the Salisbury Avenue cul-de-sac, on the southern side of the Project
  - Realignment of Wallgrove Road north of its intersection with Elizabeth Drive to accommodate the M7 Motorway northbound entry ramp
  - Realignment of Wallgrove Road to connect to Cecil Road, including a connection between Elizabeth Drive and Wallgrove Road via Cecil Road with a signalised intersection with Elizabeth Drive.
- Adjustment, protection or relocation of existing utilities
- Ancillary facilities to support motorway operations, smart motorways operation in the future and the existing M7 Motorway operation, including gantries, electronic signage and ramp metering
- Other roadside furniture including safety barriers, signage and street lighting
- Permanent water quality management measures including swales and basins
- Establishment and use of temporary ancillary facilities, temporary construction sedimentation basins, access tracks and haul roads during construction
- Permanent and temporary property and access adjustments as required.
- Adjustments of waterways, where required, including Kemps Creek, South Creek and Badgerys Creek
- Utility crossing pipelines for Sydney Water at five sites located in M12 West and Central.

More details on the description of the Project is provided in Chapter 5 of the EIS and in Section 2 of the OCEMP. Figure 2-1 shows the Project as described in its regional context.



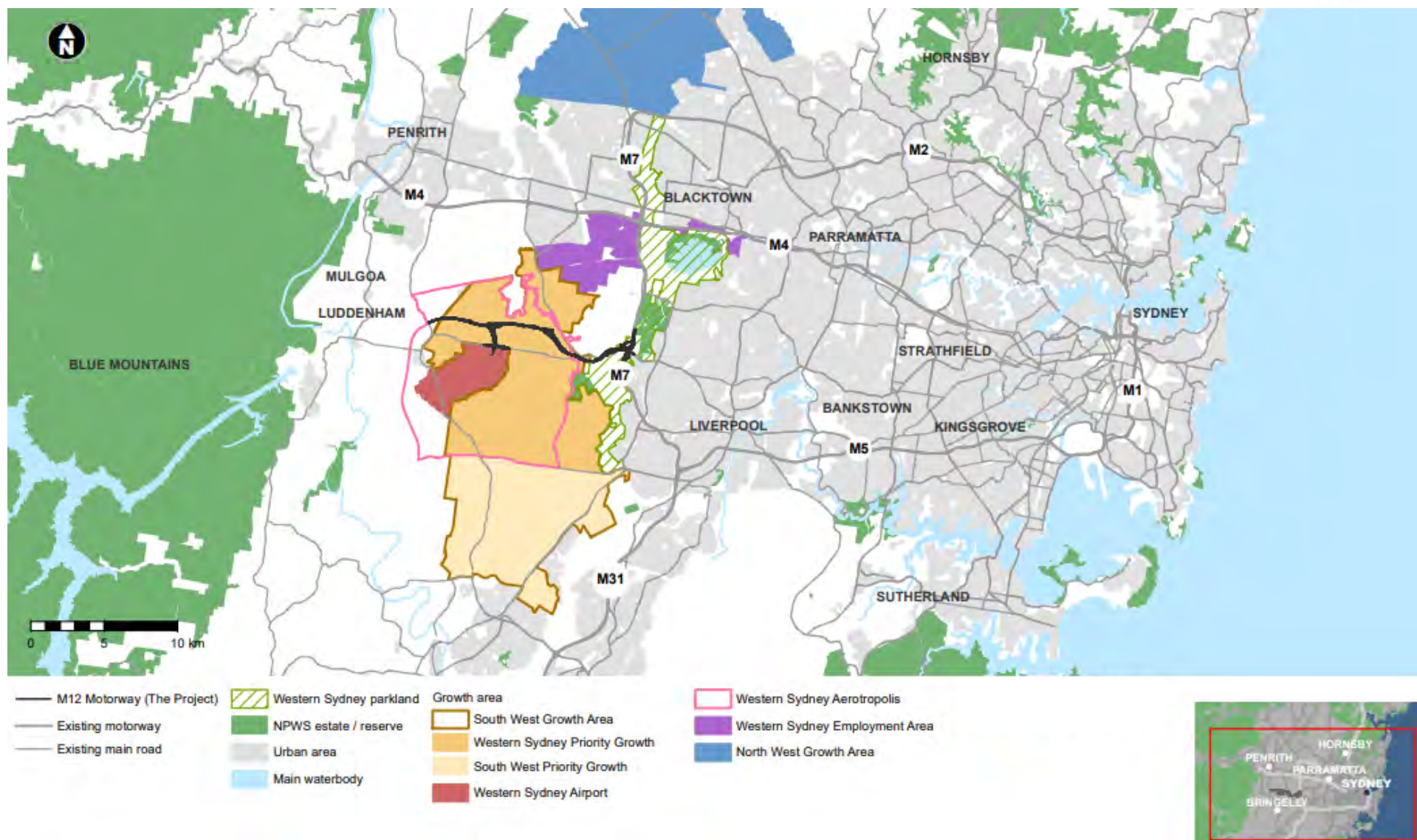
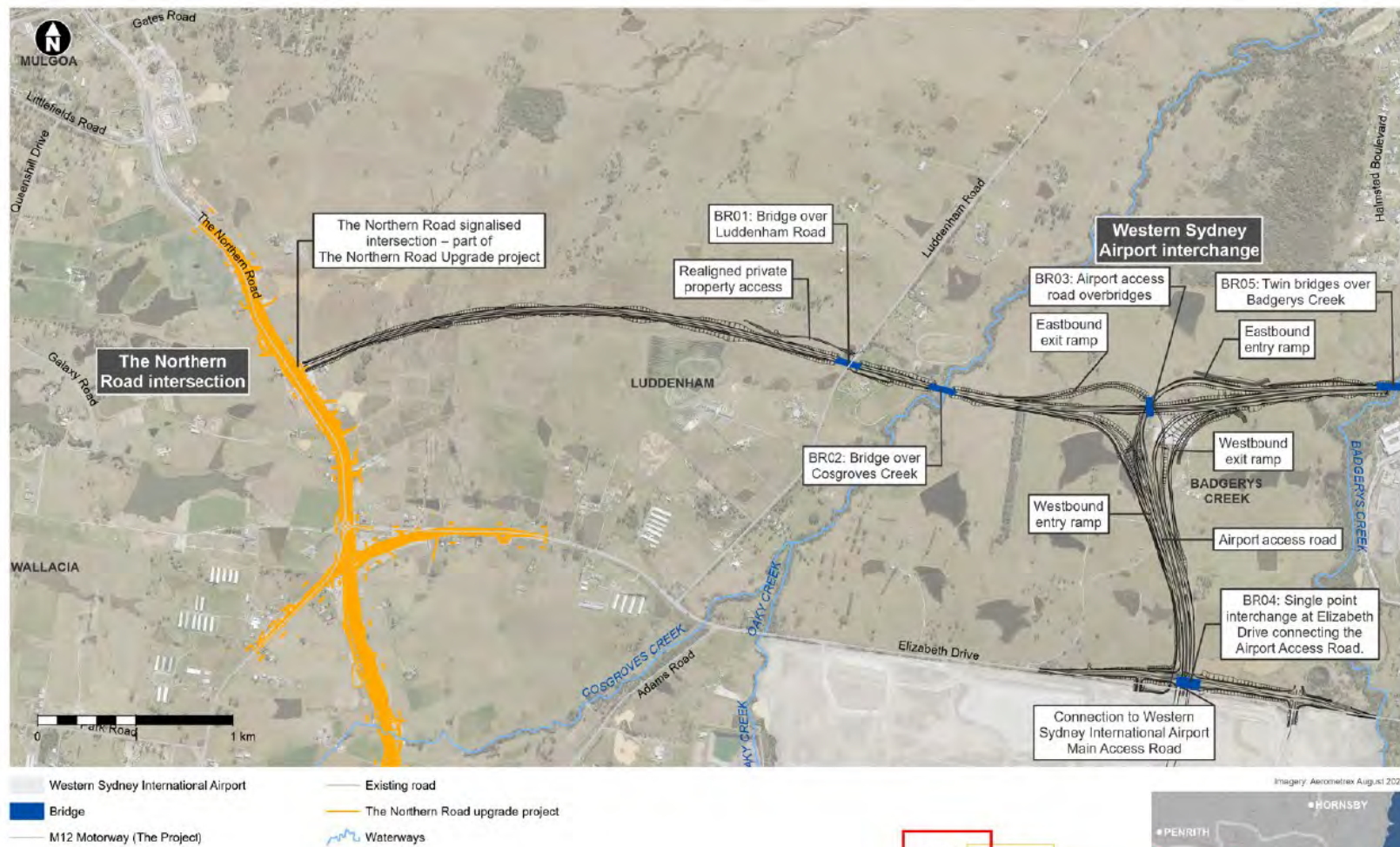
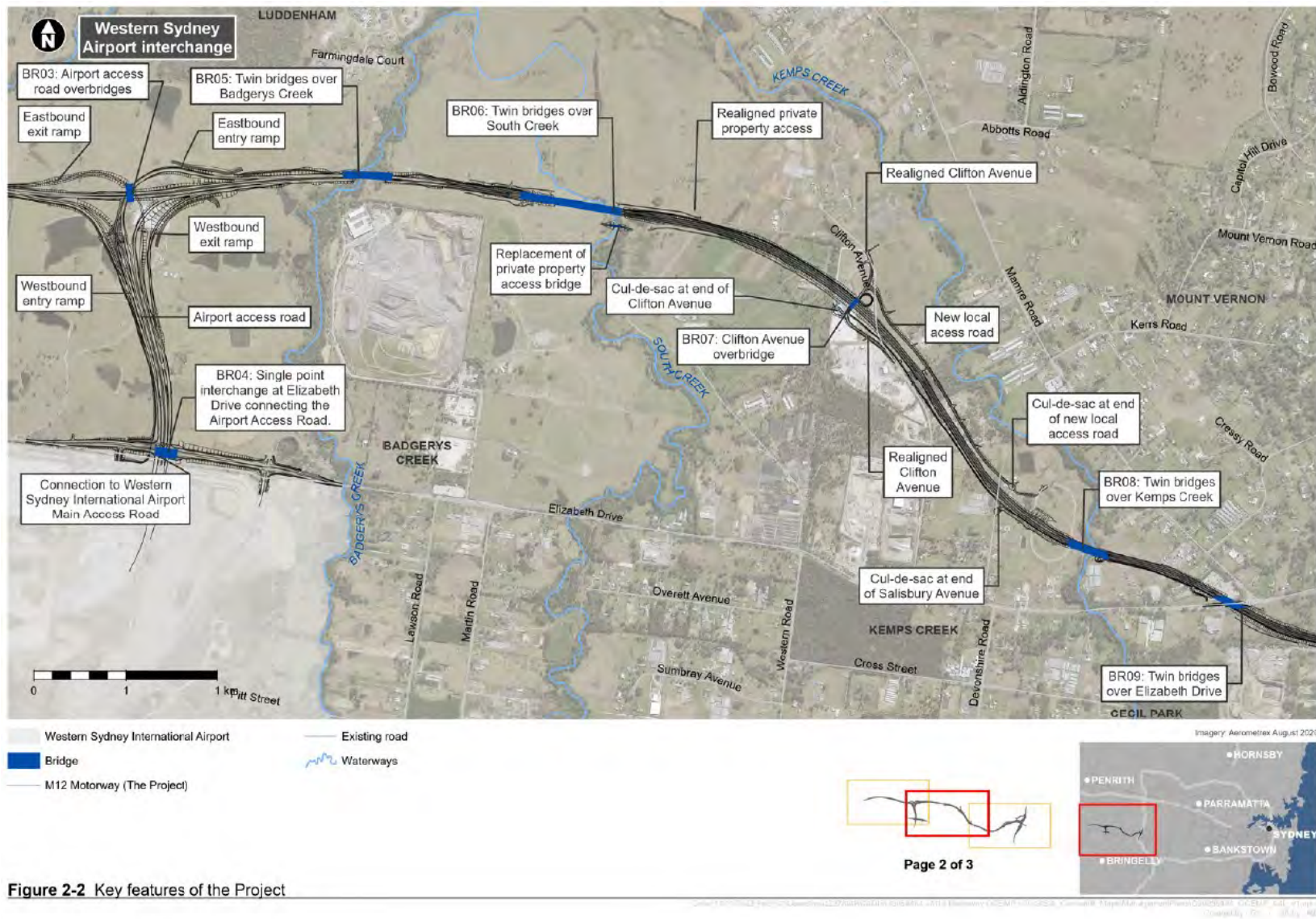


Figure 2-1: Project regional context





**Figure 2-2** Key features of the Project



**Figure 2-2 Key features of the Project**



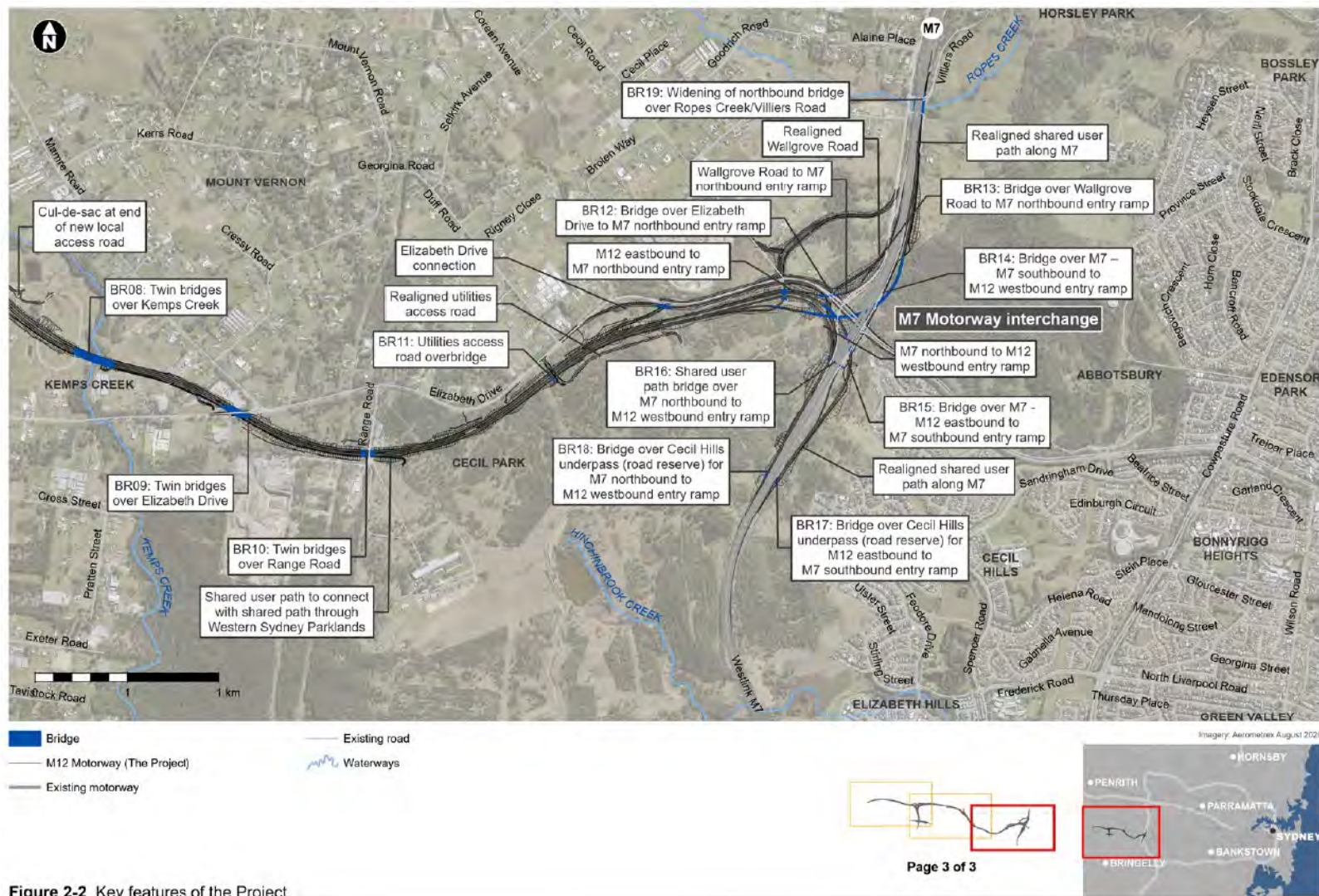


Figure 2-2 Key features of the Project

## 2.2 Project Staging

As described in Section 1.2.3, the Project is to be constructed in several stages under separate construction contracts (or works packages). Each Project stage is to be delivered in a separate construction package that will include all activities needed to complete the stage, including utility adjustments, road construction, bridge construction, traffic management, intelligent transport systems, lighting and finishing work. Each stage is split as detailed in the following sections; some overlap may occur where the respective sections meet. Prior to the main works packages, Low Impact Works (including geotechnical and archaeological investigations) will be undertaken which commenced in mid to late 2021.

Main construction is anticipated to commence in 2022 and be completed by mid-2026.

In accordance with NSW CoA A11, the CSSI (the Project) must be staged in accordance with the Project Staging Report. Where staging is proposed, the terms of the Infrastructure Approval that apply or are relevant to the work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.

Where changes are proposed to the staging of construction by Seymour Whyte, a request will be made to TfNSW to update the Project Staging Report which must be prepared and submitted to the Planning Secretary for information no later than one (1) month before the proposed change in the staging. The revised Project Staging Report must be endorsed by the ER before submitting it to the Planning Secretary.

The key features of the M12 Central package and adjacent stages is provided in Figure 2-2.

### 2.2.1 M12 West

The M12 West package is six kilometres long and runs from The Northern Road at Luddenham to approximately 250 metres east of Badgerys Creek and features a grade separated interchange with the Airport Access Road connecting the M12 Motorway to the WSIA.

The M12 West package will provide a dual carriageway with a narrow median and safety barriers running along the entire length and designed to integrate with the future Western Sydney Orbital (OSO) project. The OSO eastbound carriageway will be built to the north of the M12 Motorway alignment and the M12 Motorway carriageway would become the westbound carriageway for OSO. Emergency stopping bays and emergency crossovers will be provided at regular intervals.

### 2.2.2 M12 Central

### 2.2.3 The subject of this CEMP, described in detail within Section 2.3.M12 East –

The M12 East package involves two sections of work as described below.

#### **Elizabeth Drive connections**

Construction of this package will involve the upgrade of a two km section of Elizabeth Drive from Duff Road to 300 metres east of the M7 Motorway which includes:

- The realignment of Wallgrove Road through properties to the existing Cecil Road and Elizabeth Drive intersection
- The realignment of Cecil Road to connect it to the new Wallgrove Road
- Upgrade of Elizabeth Drive from two to three lanes in both directions from Elizabeth Drive/M7 Motorway southbound entry and exit ramp intersection to new Wallgrove Road/Elizabeth Drive intersection with provisions for three lanes on the remaining sections.

Wallgrove Road will be realigned to make room for the construction of the Elizabeth Drive connection. This will also require decommissioning a section of the existing Wallgrove Road approximately 500 metres from where it currently intersects with Elizabeth Drive. The new Wallgrove Road will connect to and replace the existing Cecil Road and Elizabeth Drive intersection and Cecil Road will be realigned to connect back into the realigned Wallgrove Road.

The package will require relocation of utility services including electricity, water and telecommunications.

### **M7/M12 interchange**

The interchange will provide a grade separated motorway connection between the M7 Motorway and M12 Motorway which will involve the provision of four connections at the grade separated interchange and tie-in extending four kilometres into the M7 Motorway corridor.

## **2.3 M12 Central package – description**

Construction of the M12 Central package involves building 7.5 km of motorway from east of Badgerys Creek to the Water Tower Access Road within Western Sydney Parklands.

The M12 Central package will provide a dual carriageway with a wide median to allow for future widening to six lanes. Safety barriers will be provided along the length of the package. Emergency stopping bays and emergency crossovers will be provided at regular intervals.

The M12 Central package starts at its western extent just north of the Suez Kemps Creek Resource Recovery Park through to around one kilometre west of the M7 Motorway. The M12 Central package traverses through the following suburbs, from west to east: Badgerys Creek, Kemps Creek, Mount Vernon, Cecil Hills and Cecil Park.

Existing roads which are crossed or close to the M12 Central package include Elizabeth Drive, Clifton Avenue, Salisbury Avenue, Devonshire Road, Range Road, Mamre Road, Duff Road.

The M12 Central package is located within greenfield areas of the South West Growth Area and within the Western Sydney Aerotropolis (formerly known as the Western Sydney Priority Growth Area). The Western Sydney Employment Area is located around six kilometres north-north-east of the M12 Central package.

The M12 Central package, include the following key features:

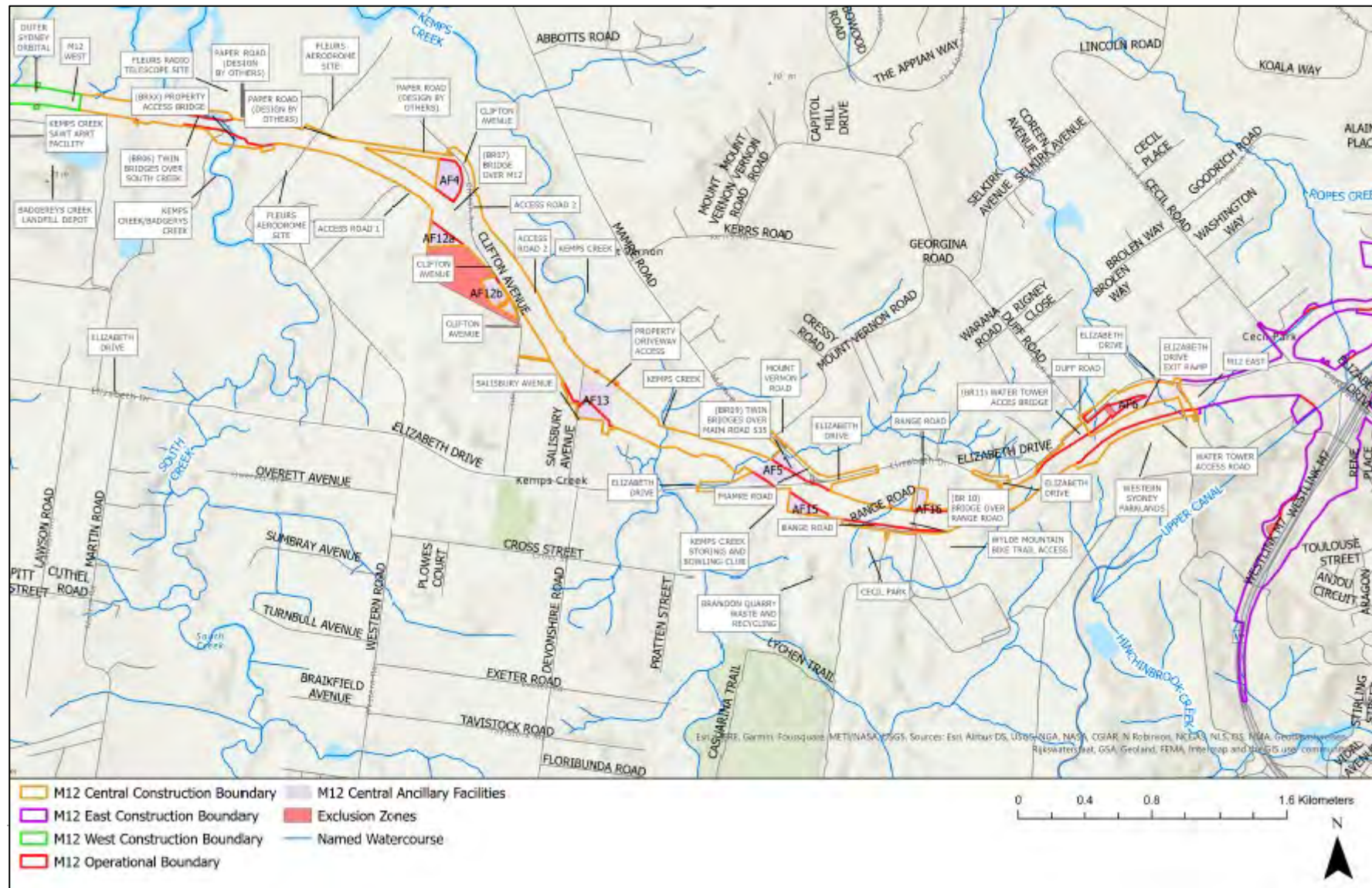
- A four lane dual-carriageway motorway, designed to facilitate widening to six lanes in the future
- A shared user path with lighting will provide an active transport link along the motorway and eastward to the M7
- Seven bridge locations as detailed below:
  - BR06 – M12 twin bridges over South Creek
  - BR07 – Clifton Avenue bridge over M12
  - BR08 – M12 twin bridges over Kemps Creek
  - BR09 – M12 twin bridges over Elizabeth Drive
  - BR10 – M12 twin bridges over Range Road
  - BR11 – Water Tower Access Road bridge over M12
  - Private property access bridge to Sydney University land.
- Miscellaneous structures including retaining walls, ITS gantries, sign supports, noise barriers and culverts

- Road drainage, comprising pits, pipes, channels and water quality facilities
- Culverts to convey existing or diverted watercourses
- Relocation and/or protection of existing utilities
- ITS infrastructure to support future smart motorways operation
- Signage, line marking, safety barriers and related road furniture
- Urban design including landscaping and public art.

The M12 Central package includes delivery of a temporary roundabout at Elizabeth Drive and Devonshire Road, Kemps Creek. This work will be delivered as a separate small M12 Central construction package and the relevant contractor will develop a streamlined CEMP in accordance with this OCEMP.

The key features of the M12 Central package are provided in Figure 2-2 .





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## 2.4 Construction activities

The M12 Central package includes the following construction activities:

- Low impact work
- Construction of ancillary facilities (including car parks, office buildings, laydown areas)
- Clearing and grubbing
- Demolition
- Construction of concrete and asphalt batching plants
- Earthworks
- Material haulage
- Crushing and screening
- Traffic management and access
- Road widening and new road work
- Intersection works including construction of temporary roundabouts
- Construction of bridges and viaducts (including piling)
- Construction of drainage
- Construction of pavements
- Installation of noise mitigation measures
- Relocation of utilities and services
- Finishing work and site restoration (road furnishing and landscaping).

An indicative construction sequence is provided in Table 2-1 including plant and equipment requirements. The indicative duration of construction activities for the M12 Central package is outlined in Table 2-2.

Construction activities will be planned to minimise disruption to existing agricultural operations/activities in surrounding properties where feasible and reasonable (e.g. stock access, access to farm dams, etc) unless otherwise agreed by the landowner.

Following the completion of detailed design, the M12 Motorway – Central Section Detailed Design Consistency Assessment was prepared in October 2021. This assessed a series of detailed design changes for its consistency with the Environmental Assessment Documentation and has subsequently been approved. The Consistency Assessment provides the Approved Project Boundary for construction, which may be subject to further consistency assessments and/or modifications. Other Consistency Assessments undertaken since 2021 relevant to M12 Central include:

- Minor Consistency Assessment (M12 Central) required amendments to the construction footprint as a result of utility adjustments and tie in works, property adjustments for flood alleviation and improvements to ancillary facility access due to safety concerns, temporary widening of Elizabeth Drive and signage installation; approved in August 2022.
- Minor Consistency Assessment (M12 Central) required amendments to the construction footprint as a result of utility adjustments and tie in works, property adjustments for flood



alleviation and improvements to ancillary facility access due to safety concerns, temporary widening of Elizabeth Drive and signage installation; approved in August 2022.

Construction of the bridges will generally involve:

- Construction of foundations (piling)
- Construction of bridge piers
- Construction of bridge abutments and spill-throughs where required
- Installation of pre-cast concrete planks/girders and barriersInstallation of the deck
- Installation of throw screens where required.
-

Table 2-1: Indicative construction sequence of the M12 Central package

Phase No.	Construction phase	Activities	Plant and equipment
0	Pre-construction Activities Low Impact Work	<ul style="list-style-type: none"> <li>Establish temporary ancillary facilities</li> <li>Establish site access</li> <li>Erect temporary fencing around pre-construction works footprint perimeter</li> <li>Install safety barriers and traffic control devices for protection of the work area</li> <li>Install environmental controls</li> <li>Minor clearing of vegetation</li> <li>Identify utilities and services</li> <li>Work meeting the definition of Low Impact Work under the Infrastructure Approval</li> </ul>	<ul style="list-style-type: none"> <li>Traffic control</li> <li>Temporary fencing</li> <li>Excavators (up to 14-20 tonnes)</li> <li>Site vehicle, tippers and bogies</li> <li>Plate compactors and small rollers</li> <li>Elevated work platforms</li> <li>Water cart</li> <li>Steel plates</li> <li>20T Franna crane</li> <li>Compressor</li> <li>Vacuum truck</li> </ul>
1	Site establishment and enabling works	<ul style="list-style-type: none"> <li>Set up ancillary facilities as needed</li> <li>Erect temporary fencing around construction footprint perimeter</li> <li>Establish temporary crossings of Clifton Avenue and Elizabeth Drive to permit haulage routes</li> <li>Construct a turning head for Salisbury Avenue</li> <li>Construct local access roads for properties divided by the M12 Central package</li> <li>Remaining heritage salvage works at Fleurs Radio Telescope site</li> <li>Certain buildings and structures within the construction footprint will require demolition and removal where they are not proposed to be used as ancillary facilities during construction. This includes: <ul style="list-style-type: none"> <li>Buildings, sheds or farm infrastructure that fall within the construction footprint</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Trucks</li> <li>Light vehicles</li> <li>Generators</li> <li>Crane</li> <li>Bobcat</li> <li>Excavator</li> <li>Boring machines</li> <li>Piling machines</li> <li>Dump trucks</li> <li>Plate compactors</li> <li>Concrete pumps</li> <li>Concrete truck</li> </ul>

Phase No.	Construction phase	Activities	Plant and equipment
		<ul style="list-style-type: none"> <li>- A bridge crossing South Creek on private property.</li> <li>• Carry out early stockpiling of fill</li> <li>• Works to remove pockets of contamination</li> <li>• Utility relocation works</li> <li>• Vegetation and topsoil will be stripped before earthworks are carried out, including removal of vegetation and topsoil stripping</li> <li>• Emptying of existing farm dams</li> <li>• Installation of environmental controls</li> </ul>	<ul style="list-style-type: none"> <li>• Graders</li> <li>• Vibrating rollers</li> <li>• Spray sealing equipment</li> <li>• Asphalt paving machines</li> <li>• Compactors</li> <li>• Chainsaws</li> <li>• Mulcher</li> </ul>
2	Bulk earthworks, drainage and structures, bridge construction, pavement works	<ul style="list-style-type: none"> <li>• Construct all areas of the M12 Central package from east of Badgerys Creeks to the Water Tower Access Road within Western Sydney Parklands</li> <li>• Operation of all ancillary sites</li> <li>• Bulk earthworks along the entire construction footprint, including: <ul style="list-style-type: none"> <li>- Areas of new cut and fill along the construction footprint, including at all interchanges</li> <li>- Construction of retaining walls</li> <li>- Cut and fill or preparation of site for construction of all bridges</li> </ul> </li> <li>• Onsite haulage will be required to move spoil between areas of the site as required</li> <li>• Construct bridges over Clifton Avenue (BR07), Range Road (BR10), and Elizabeth Drive (BR09)</li> <li>• Construct a bridge over the main line for Water Tower Access Road (BR11)</li> <li>• Construct bridges at South Creek (BR06) and Kemps Creek (BR08) with waterway realignments as required</li> </ul>	<ul style="list-style-type: none"> <li>• Light vehicles</li> <li>• Excavator</li> <li>• Compactors</li> <li>• Bulldozers</li> <li>• Graders</li> <li>• Water carts</li> <li>• Dump trucks</li> <li>• Vibrating rollers</li> <li>• Spray sealing equipment</li> <li>• Asphalt paving machines</li> <li>• Concrete saws</li> <li>• Slip-forming machines</li> <li>• Concrete pumps</li> <li>• Concrete trucks</li> <li>• Rock breaker</li> <li>• Welding equipment</li> <li>• Piling machines</li> </ul>

Phase No.	Construction phase	Activities	Plant and equipment
		<ul style="list-style-type: none"> <li>Road works including the surfacing and concrete/asphalt works associated with the construction of the road surface</li> <li>Construction of new drainage infrastructure and alterations to existing drainage. Construction of drainage works will involve localised excavation, compaction and installation of drainage pipes and pits, and construction of table drains and temporary construction sediment basins</li> <li>Installation of environmental controls</li> </ul>	<ul style="list-style-type: none"> <li>Oxy-cutting equipment</li> <li>Cherry pickers</li> <li>Jackhammers</li> <li>Boring machines</li> <li>Bobcats</li> <li>Cranes</li> </ul>
3	Finishing works	<ul style="list-style-type: none"> <li>Complete all remaining work on the M12 Central package including signage and line marking</li> <li>Decommission and rehabilitate all temporary watercourse crossings and local road haulage crossings</li> <li>Vacate, decommission and rehabilitate all ancillary facilities</li> <li>Finalise the tie-in works at Elizabeth Drive/Mamre Road intersection and switch traffic</li> <li>Removal of temporary environmental controls.</li> </ul>	<ul style="list-style-type: none"> <li>Light vehicles</li> <li>Excavators</li> <li>Generators</li> <li>Dump trucks</li> <li>Concrete trucks</li> <li>Hydro-mulching equipment</li> <li>Cranes</li> <li>Water cart</li> <li>Compactor</li> <li>Bobcats</li> <li>Road marking machine</li> <li>Welding equipment</li> </ul>

Table 2-2: Indicative construction program of the M12 Central package

Construction activity	M12 Central package – indicative construction program																							
	2021				2022				2023				2024				2025				2026			
Mobilisation/ Site Compounds																								
Property adjustments																								
Utilities relocation																								
Fencing																								
Demolition/clearing																								
Bulk earthworks																								
Bridge works																								
Drainage																								
Pavement																								
Barriers																								
Landscaping																								
Intelligent transport systems																								
Lighting																								
Signage																								
Decommission ancillary facilities																								

## 2.5 Ancillary facilities

Ancillary facilities are required to support construction of the M12 Central package, comprising:

- Temporary buildings (generally prefabricated) including offices and meeting rooms, amenities and first aid facilities (the size and number of office facilities at the main ancillary facilities will be greater than at the secondary ancillary facilities)
- Hardstand parking areas with sufficient space to accommodate the numbers of construction workers expected at any site
- Materials laydown, storage and handling areas, including purpose built temporary structures as required
- Batching plant
- Crushing, grinding and screening operations.

Two types of ancillary facilities are defined in the NSW Infrastructure Approval:

- Minor Construction Ancillary Facility: Lunch sheds, office sheds, portable toilet facilities, and the like that meet the requirements of NSW CoA A20
- Construction Ancillary Facility: A temporary facility for construction of the CSSI including an office and amenities compound, construction compound, material crushing and screening plant, materials storage compound, maintenance workshop, testing laboratory, material stockpile area, access and car parking facilities and utility connections to the facility.

In accordance with NSW CoA A20, minor ancillary facilities can be established and used by the Construction Contractor if they have been assessed in the EAD, and do not require approval from the ER. For minor construction ancillary facilities not included in the EAD, the ESR (or delegate) will prepare minor construction ancillary facilities assessments for review and approval by the ER in accordance with NSW CoA A20. The criteria required for ER consideration is outlined in Appendix A4.

The EAD identified and assessed construction ancillary facilities AF1 to AF18. In the M12 Central package, construction ancillary facilities include:

Table 2-3: NSW CoA relevant to the CEMP

Reference	Primary use of ancillary facility
AF4	Concrete and/or asphalt batching plants Material and earthworks stockpile Plant servicing workshop Site offices Amenities Vehicular access and car park
AF5	Material and earthworks stockpile Bridge construction Plant servicing workshop Double-handling laydown

Reference	Primary use of ancillary facility
	Site offices
AF6	Material and earthworks stockpile Bridge construction Plant servicing workshop Site offices
AF12	Material and earthworks stockpile Amenities Vehicular access and car park
AF13	Material and earthworks stockpile Site offices Amenities Vehicular access and car park
AF15	Material and earthworks stockpile Site offices Amenities Vehicular access and car park
AF16	Material and earthworks stockpile Site offices Amenities Vehicular access and car park

Any additional construction ancillary facilities that are not identified by description or location in the Environmental Assessment Documentation will be assessed in accordance with the criteria in NSW CoA A15, using the ancillary facilities assessment provided in Appendix A4 of the CEMP.

AF16a was assessed using the ancillary facilities assessment and endorsed by the ER as a minor change to the Site Establishment Management Plan on 23/06/2023 (Rev H)

Additional construction ancillary facilities must comply with the requirements of NSW CoA A15, including:

- Located within or immediately adjacent to the construction boundary
- Not located next to a sensitive receiver(s) (including where an access road is between the facility and the receiver(s)), unless the sensitive receiver(s) (both the landowner(s) and occupier(s)) have given written acceptance to the carrying out of the relevant facility in the proposed location
- No impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the Infrastructure Approval
- Establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.

Where additional ancillary facilities do not meet the requirements of NSW CoA A15, a modification assessment report will be prepared for the Planning Secretary's approval.

Before establishment of any construction ancillary facility (excluding minor construction ancillary facilities), a Site Establishment Management Plan (SEMP) will be prepared in accordance with NSW CoA A16. The SEMP will detail the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facilities. Refer to Section 3.3.6 for further information on the SEMP.

Construction ancillary facilities must be operated during standard construction hours only unless otherwise permitted through an out of hours works approval developed in accordance with the Infrastructure Approval and EPL. See Appendix B2, Construction Noise and Vibration Management Sub-plan for more details on the approval of out of hours works, including at compounds.

In accordance with NSW CoA A21, boundary fencing will be erected around all construction ancillary facilities that are adjacent to sensitive receivers for the duration of construction, unless otherwise agreed with the affected residents, business operators and landowners. Boundary screening will minimise, as far as practicable, visual impacts on adjacent sensitive receivers as per NSW CoA A22.

Information on the minor construction ancillary facilities assessment and the locations of the assessed construction ancillary facilities is referenced in Appendix A4.

Small laydown areas for short term temporary placement of material will be required within active work sites. These are part of the work zone rather than ancillary facilities. If storage of the material at the worksite is required, this will be assessed under the NSW CoA A20 as a Minor Ancillary Facility.

## 2.6 Other Projects in development – Cumulative impacts

In addition to the four stages of the Project which will mostly be delivered concurrently, there are a number of other major construction projects concurrently being delivered within the vicinity of the Project, including, but not limited to:

- Western Sydney International Airport
- Sydney Metro – Western Sydney Airport The Northern Road upgrade
- Western Sydney Aerotropolis
- Other potential road projects such as Elizabeth Drive upgrade, Mamre Road upgrade and Outer Sydney Orbital
- Development land releases such as Southwest Growth Area and Western Sydney Employment Area.

It is noted that the scale of cumulative impacts is dependent upon timing, location and type of construction activities. Regular interface meetings will be undertaken with government authorities, neighbouring Project packages, other projects, and stakeholders as detailed in Section 5.5.2 and 5.5.3 and within the Overarching Communication Strategy (OCS).

## 2.7 Utilities

Seymour Whyte must identify the utilities and services (hereafter “services”) potentially affected by M12 Central package to determine requirements for diversion, protection and/or support.

Alterations to services must be determined by negotiation between the Seymour Whyte or TfNSW



and the service providers. The Seymour Whyte in consultation with service providers must ensure that disruption to services resulting from the M12 Central package are avoided where possible and where unavoidable, customers are advised in accordance with the OCS and CSEP.

## 3 Environmental Management Systems Overview

### 3.1 Environmental Management System

The CEMP has been prepared in accordance with the overarching environmental management principles as shown in Figure 3-1, and consistent with those outlined in the OCEMP.

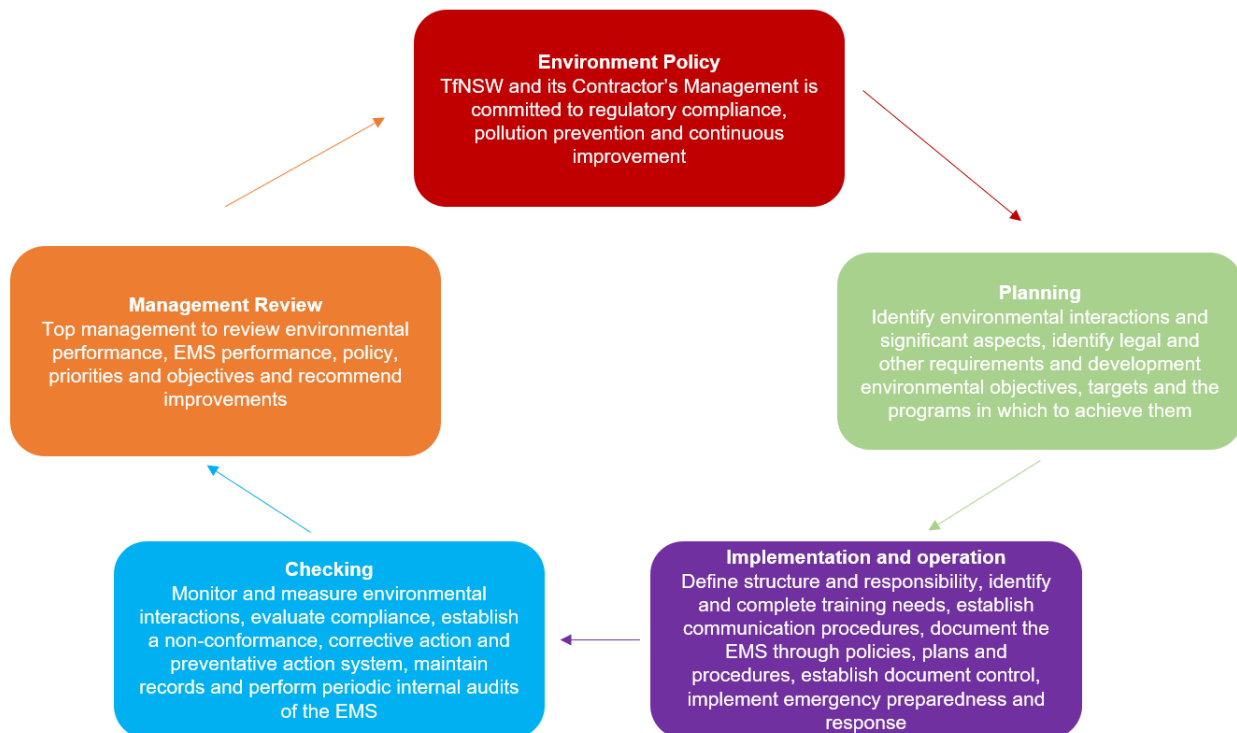


Figure 3-1: Overview of the Project environmental management principles

Source: <http://www.environmentalmanagementsystem.com.au/what-is-an-environmental-management-system.html>

The CEMP has been prepared in accordance with these principles and provides the overarching structure to the environmental management of the M12 Central package. To achieve the intended environmental performance outcomes, Seymour Whyte have established, implemented, maintained and continually improved a certified Environmental Management System (EMS) in accordance with the requirements of ISO14001:2015. The Seymour Whyte EMS will be adopted as the guiding environmental management framework for the M12 Central package.

### 3.2 M12 Central – Environment and Sustainability Policy

The M12 Central package Environment and Sustainability Policy, provided in Appendix A3, has been developed consistent with TfNSW's overarching Environment and Sustainability Policy. The Policy provides Seymour Whyte's commitment to continual improvement in environmental performance and compliance with applicable legal requirements.

The M12 Central package Environment and Sustainability Policy will be displayed on the Project website and at M12 Central package site offices and communicated to all Seymour Whyte staff and other interested parties via inductions and ongoing awareness programs (refer to Section 5.3).

### 3.3 Construction Environmental Management Plan

This CEMP has been developed under and consistent with the OCEMP (as described in Section 1.2.5). This Plan is the stage-specific CEMP providing an overarching framework for the environment management documents developed for the M12 Central package, as per Figure 3-2.

This CEMP establishes the system for implementation, monitoring and continuous improvement to minimise environmental impact from construction of the M12 Central package. TfNSW will review this CEMP, the aspect specific Sub-plans and Monitoring Programs for compliance with the approved OCEMP documents. Thereafter, the ER will approve the CEMP, aspect specific Sub-plans and Monitoring Programs prior to implementation. Any amendments to the CEMP and relevant documents will require TfNSW review and ER approval as outlined in Section 1.12.

This CEMP addresses the requirements of the EMS (Figure 3-1) in the following sections:

- Environmental Policy – Appendix A3
- Planning – Sections 4.1 to 4.3
- Implementation and operation – Sections 5.1 to 5.5 and appendices
- Checking – Section 7
- Management review – Section 7.6.3.

As a key document the CEMP integrates environmental management requirements, TfNSW obligations and community expectations during M12 Central delivery. It provides environmental management protocols for the construction stage of the M12 Central package. This Plan and the associated Sub-plans were prepared in accordance with TfNSW specifications G36, G38, G40, the *Guideline of the Preparation of Environmental Management Plans* (DIPNR, 2004) and *Environmental Management Plan Guideline – Guideline for Infrastructure Projects* (DPE, 2020). This CEMP also addresses the relevant Infrastructure Sustainability Council requirements.

The supporting appendices prepared under the CEMP comprise:

- Appendix A1 Legal and Other Requirements
- Appendix A2 Initial Risk Register
- Appendix A3 Environment and Sustainability Policy
- Appendix A4 Ancillary Facilities Assessment Criteria
- Appendix A5 Document Register
- Appendix A6 Sensitive Area Plans
- Appendix A7 M12 Environmental Incident Classification and Reporting Procedure
- Appendix A8 Environmental Work Method Statement Template

In addition to the CEMP Sub-plans and Construction Monitoring Programs, described in Section 3.3.1, other documentation is required to support the delivery of construction as described in the following sections.

Any document that is submitted or action taken within a timeframe specified in or under the terms of the Infrastructure Approval may be submitted or undertaken within a later timeframe agreed with the Planning Secretary. This does not apply to NSW CoA A44 and A45.

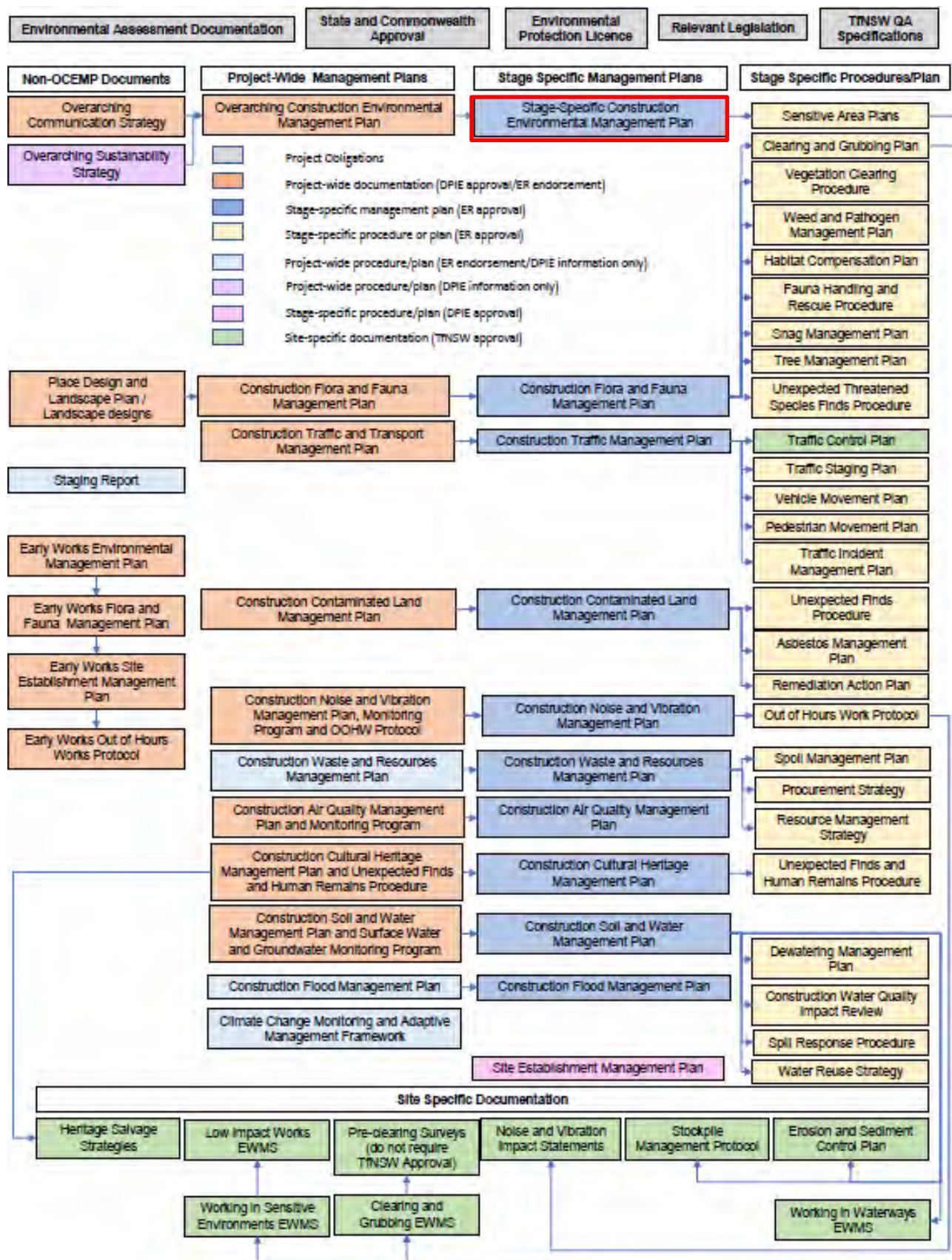


Figure 3-2: Project EMS overview (this Plan is highlighted with a red border)



### 3.3.1 Environmental Management Sub-plans and Monitoring Programs

Aspect-specific Environmental Management Sub-plans including, issue-specific construction Monitoring Programs have been developed where required by the Infrastructure Approval to support this CEMP. The Monitoring Programs are included as an appendix to the appropriate Sub-plans (see Section 7.2 for further information).

The Sub-plans and Monitoring Programs have been prepared under and consistent with the overarching management systems established in the OCEMP which address the requirements of the NSW and Commonwealth Infrastructure Approval, and mitigation measures identified in the Environment Assessment Documentation. The Sub-plans address the requirements listed in NSW CoA C4 and the relevant REMMs. The Monitoring Programs address the requirements listed in NSW CoA C13 (refer to Section 7.2 for further information).

The Sub-plans and Monitoring Programs have been prepared to identify requirements and processes applicable to specific impacts or aspects of the activities described in Section 2. The Sub-plans and Monitoring Programs have also been prepared to compare the actual performance of construction of the M12 Central package against the performance described in the Environment Assessment Documentation, in accordance with NSW CoA C11.

The Sub-plans include:

- Appendix B1 Construction Transport and Traffic Management Sub-plan
- Appendix B2 Construction Noise and Vibration Management Sub-plan
- Appendix B3 Construction Flora and Fauna Management Sub-plan
- Appendix B4 Construction Soil and Water Management Sub-plan
- Appendix B5 Construction Contaminated Land Management Sub-plan
- Appendix B6 Construction Cultural Heritage Management Sub-plan
- Appendix B7 Construction Air Quality Management Sub-plan
- Appendix B8 Flood Management Sub-Plan
- Appendix B9 Construction Waste and Resources Sub-plan
- Appendix B10 Climate Change Monitoring and Adaptive Management Framework.

Monitoring Programs include:

- Construction Noise and Vibration Monitoring Program, Appendix B of Appendix B2
- Soil and Water Monitoring Program, Appendix C of Appendix B4
- Construction Air Quality Monitoring Program, Appendix B of Appendix B7.

### 3.3.2 Other plans and strategies

In addition to the CEMP, Sub-plans and Monitoring Programs, a number of other plans and strategies are required during construction under the NSW and Commonwealth approvals. The Project Staging Report, developed in accordance with NSW CoA A9, provides the applicability of these plans and strategies to the M12 Central package and allocates the responsibility for their development.

With the approval of the Secretary, TfNSW and/or Seymour Whyte may submit any strategies plans or programs required by the Infrastructure Approval on a progressive basis. Noting that:

1. While any strategy, plan or program may be submitted on a progressive basis, TfNSW and Seymour Whyte (as relevant) will need to ensure that the Work being undertaken on site is covered by suitable strategies, plans or programs at all times; and
2. If the submission of any strategy, plan or program is to be submitted on a progressive basis, then the relevant strategy, plan or program must clearly describe the specific Work or stage to which the strategy, plan or program applies, the relationship of the Work or stage to any future Work or stages, and the trigger for updating the strategy, plan or program if and as relevant.

It is noted that a temporary roundabout at Elizabeth Drive and Devonshire Road will be delivered as a separate small M12 Central construction package and the relevant contractor will develop a streamlined CEMP in accordance with the OCEMP. This stage specific CEMP would not include sub-plans or monitoring programs to be commensurate with the nature and extent of the required construction activities. This stage specific CEMP will be endorsed by the ER prior to the commencement of works.

### **3.3.3 Environmental Work Method Statements (EWMS)**

Environmental Work Method Statements (EWMS) will be prepared to manage and control high risk activities that have the potential to negatively impact on the environment. EWMS will be prepared by the ESR and reviewed by the TfNSW Project Manager, TfNSW ESM (or delegate) and ER before commencement of the construction activities to which they apply.

EWMS incorporate appropriate mitigation measures and controls, including those identified in the relevant Sub-plans. They also identify key activity specific procedures to be used concurrently with the EWMS. EWMS are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simple written instructions. A template EWMS is provided in Appendix A8. Appendix A8 also contains a template EWMS register and template EWMS training register to be used on the M12 Central package.

EWMS for activities identified as having high environmental risk will undergo consultation with stakeholders and authorities before approval. A list of upcoming/future EWMS will be provided to the Environmental Review Group (ERG) participants during regular meetings for consultation.

As a minimum, EWMS will be prepared for the activities:

- Low impact work
- Activities with high environmental risk
- Activities that impact on or are in proximity to environmentally sensitive areas such as ecological communities and threatened species
- Activities that impact on or are in proximity to waterways including:
  - Kemps Creek
  - South Creek
- Activities that impact on or are in proximity to non-Aboriginal heritage sites including:
  - Fleurs radio telescope site



- Fleurs Aerodrome
- Exeter Farm Archaeological site
- Activities that impact on or are in proximity to Aboriginal heritage sites including:
  - CCE T1
  - CCE T2
  - CCE T3
  - BWB
  - BCW
  - BCE
  - SCW T1
  - SCW T2
  - SCE
  - KNW
  - M12A1
  - Kemps Creek AFT 1 (AHIMS 45-5-5478)
- Pre-construction activities including (as relevant):
  - Delineation of sensitive areas
  - Installation of erosion and sedimentation control
  - Heritage excavation and salvage
  - Treatment of contamination sites
- Topsoil stripping and earthworks including temporary stockpiling and disposal of excavated material and protocols for the management of materials containing asbestos
- Utilities relocation
- Compound and ancillary facility establishment and use
- Piling
- Contaminated land
- Activities that involve work in waterways or that pose a risk to receiving water quality including:
  - Construction and operation of sediment basins and/ or buffer swales and connecting drainage for the associated catchment area
  - Construction of culverts, including associated staging, flow diversions, any dewatering, short- and long-term stabilisation and removal of existing structures
- Vegetation clearing and grubbing
- Installation of temporary construction boundary fencing
- Dewatering activities including activities where construction water may be discharged into natural waterways
- Construction and operation of concrete wash out areas
- Managing runoff from curing processes
- Activities that generate high levels of noise and/or vibration (where there are nearby receptors)
- All works associated with rehabilitation of dams including but not limited to dewatering and filling.

The EWMS will include at least the following elements:

- Description of the work activity, including any plant and equipment to be used



- Outline of the sequence of tasks for the activity, including interfaces with other construction activities
- Identification of any environmental and/or socially sensitive areas, sites or places
- Identification of potential environmental risks/impacts due to the work activity
- Mitigation measures to reduce the identified environmental risk, including assigned responsibilities to site management personnel
- Process for assessing the performance of the implemented mitigation measures.

EWMSs may be submitted progressively to suit the construction stages.

EWMS are to be developed in consultation with the relevant site management personnel to ensure that all issues are addressed, methods and activities are practical and all construction personnel, including sub-contractors are aware of their commitments and responsibilities. The ESR and Seymour Whyte Project Manager will review and endorse by their personal signature each EWMS prior to submitting it to the appropriate regulatory authority, the ER and TfNSW for review at least 20 working days prior to the commencement of the work activities referred to in the EWMS.

For high-risk activities, EWMS are to be provided to the appropriate regulatory authority(ies) for review and comment (e.g. this includes notification to DPI Fisheries under s199 of the FM Act for all work in Waterways and consideration of matters raised within the time specified in the legislation). Consultation with the appropriate regulatory authority(ies) is to be discussed with TfNSW prior to commencing consultation.

Each EWMS must be submitted to TfNSW under a separate Hold Point, and separate to that for the CEMP.

All construction personnel and sub-contractors undertaking a task governed by an EWMS must participate in training on the EWMS as detailed in Section 5.3, and acknowledge that they have read and understood their obligations by signing an attendance record prior to commencing work.

Regular monitoring, inspections and auditing of compliance with the EWMS will be undertaken by Project management, quality and environmental personnel, as outlined in Section 7, to ensure that all controls are being followed and properly implemented, to ensure its effectiveness and that any non-conformances are recorded and corrective actions implemented. Where appropriate, improvements will be incorporated following reviews as described in Sections 1.12 and Section 7.6.3. If there are any changes to the EWMS, the appropriate regulatory authority, ER and TfNSW are to be advised of any proposed changes before the changed work method is adopted.

A register of EWMS will be maintained in Appendix A5.

### **3.3.4 Erosion and Sediment Control Plans**

Erosion and Sediment Control Plans (ESCPs) are planning documents for managing erosion and sedimentation and show the site layout and the location of erosion and sediment control mitigation on-site. They cover all construction stages from initial vegetation clearing through to rehabilitation when erosion and sediment control are no longer required and are removed. ESCPs are to be developed by persons with demonstrated skills and experience in preparing ESCPs in accordance with the 'Blue Book' guidelines (Landcom, 2004) and implemented during construction.

ESCPs may be produced in conjunction with EWMS to provide more detailed site-specific environmental mitigation measures and will be developed before commencing activities within each catchment for the M12 Central package.

The requirements of ISC Credit Dis-1 (receiving water quality) Level 2 construction requirements should also be included when preparing ESCP's. These requirements are:

- Measures to minimise adverse impacts to receiving water environmental values during construction and operation have been identified and implemented
- Monitoring of water discharges and receiving waters is undertaken at appropriate intervals and at times of discharge during construction
- Monitoring and modelling of water discharges and receiving waters demonstrates no adverse impact on receiving water environmental values
- The infrastructure does not increase peak stormwater flows for rainfall events of up to a 1.5 year average recurrence interval event discharge.

ESCPs will be developed by Seymour Whyte environmental personnel in consultation with the Project Managers, Site Engineers, Foreman/ Site Supervisor, other relevant site personnel and the SWC Soil Conservationist, as required. The ESCP must be signed and approved by the ESR, Construction Manager, Project Manager and SWC Soil Conservationist before submitting the ESCP to TfNSW for review at least 10 working days before disturbance occurs. TfNSW must review the ESCP before releasing the hold point.

ESCPs will be modified to reflect site conditions at the time of construction. For updates to the ESCP and minor changes thereafter, the ESCP will be approved by the ESR.

### **3.3.5 Sensitive Area Plans**

Construction works are located amongst and in proximity to sensitive areas and sites. To assist pre-construction planning and on-site construction management, these site constraints will be consolidated on a series of map-based sheets that extend the length of the M12 Central package. Sensitive Area Plans (SAPs) include information pertaining, but not limited to:

- Threatened Ecological Communities (TECs) listed in NSW:
  - Shale Gravel Transition Forest in the Sydney Basin Bioregion (endangered)
  - Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion (endangered)
  - Moist Shale Woodland in the Sydney Basin Bioregion (endangered)
  - River-Flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South East Corner Bioregions (endangered)
  - Cumberland Plain Woodland in the Sydney Basin Bioregion (critically endangered)
  - Swamp oak floodplain forest of the NSW North Coast, Sydney Basin and South East Corner bioregions (endangered)
- EPBC Act listed TECs:
  - Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest (critically endangered)
  - Western Sydney Dry Rainforest and Moist Woodland on Shale (critically endangered)
- EPBC Act listed threatened flora species:

- *Pultanaea tenuifolia parviflora* (Sydney Bush Pea)
- *Dillwynia tenuifolia*
- Actual and potential habitat for Cumberland Plain Land Snail, White Bellied Sea Eagle, Grey-headed Flying-fox, Swift Parrot and Southern Myotis
- Areas of vegetation to be retained
- State forest/national parks/nature reserves/flora reserves
- Heritage items:
  - Fleurs radio telescope site
  - Fleurs Aerodrome
  - Cecil Park School, Post Office and Church Site
  - Exeter Farm Archaeological site
- Aboriginal heritage sites including assessment boundaries, items, places, objects and sites
- Waterways:
  - Kemps Creek
  - South Creek
- Noise sensitive receivers e.g. residential dwellings, educational institutions
- Potential or actual acid sulphate soil areas
- Contaminated sites
- Monitoring locations for groundwater, surface water and dust.

SAPs will include the most up-to-date Construction Boundary (the working area available to Seymour Whyte) provided by TfNSW from the design drawings.

Overarching SAPs for the Project are presented in Appendix A6 of the OCEMP. Stage specific SAPs for the M12 Central package are provided in Appendix A6 of this CEMP. SAPs will be a working element of the CEMP and will be revised throughout construction to reflect true ground conditions and the most up-to-date information available on sensitive sites. SAPs will be used in conjunction with EWMS to help identify key risk areas and to promote ongoing communication with construction personnel.

SAPs will be reviewed by the TfNSW ESM (or delegate) prior to commencement of construction.

### 3.3.6 Site Establishment Management Plan

Before establishment of a construction ancillary facility not identified by description and location in the Environmental Assessment Documentation, the ESR will assess the ancillary facility in accordance with NSW CoA A15 and the Environment Assessment Documentation. If criteria in NSW CoA A15 cannot be complied with, a modification will be required for the establishment of the ancillary facility.

Following this assessment, and before establishment of a construction ancillary facility, the ESR will prepare a SEMP or SEMPs in accordance with NSW CoA A16. The SEMPs will detail the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facilities. The SEMPs will be prepared in consultation with the relevant

Council(s) and government agencies and be approved by the Secretary before the establishment of major construction ancillary facilities. The SEMP's will detail the management of the ancillary facilities and include:

- A description of activities to be undertaken during construction (including scheduling of construction)
- Figures illustrating the proposed site layout
- A program for ongoing analysis of the key environmental risks arising from the site establishment activities, including an initial risk assessment undertaken before the commencement of site establishment works
- Details of how the site establishment activities will be carried out to:
  - Meet the performance outcomes stated in the EIS and Amendment Report
  - Manage the risks identified in the risk analysis
- A program for monitoring the performance outcomes, including a program for construction noise monitoring of site establishment activities.

Information on ancillary facilities assessment is provided in Appendix A4.

### **3.3.7 Environmental system, procedures, forms and other documents**

The Environmental Management System procedures, forms and other documents provide instructions and records related to both environmental and non-environmental activities throughout the M12 Central package. Where applicable, existing Seymour Whyte procedures and work instructions will be applied or amended for use on the M12 Central package. TfNSW will review this documentation to confirm consistency with the requirements of the OCEMP and specifications.

A register of relevant environmental documents will be maintained in Appendix A5.

### **3.3.8 Low impact work**

If Low Impact Work is proposed prior to the Hold Point release of the CEMP by TfNSW (Section 7.6.3), then Seymour Whyte will submit a Low Impact Work Method Statement (LIWMS), at least 10 working days prior to the activity, that includes the following information;

- Description of activities to be undertaken
- Justification for how the proposed works conform to the definition of Low Impact Work
- A risk assessment to identify environmental risks associated with the Low Impact Work
- Management measures to minimise risks associated with the Low Impact Work
- Reference to the relevant sections of the OCEMP that outlines the approved procedure for Low Impact Work and any management measures relevant to the proposed Low Impact Work.

## 4 Planning

### 4.1 Environmental aspects and impacts

In accordance with NSW CoA C2(c), Appendix A2 contains a list of environmental activities and impacts attributable to the M12 Central package. This will be updated to incorporate the outcomes of the risk assessment workshop (refer to Section 4.1.1) and as appropriate, during construction.

Where relevant, the requirements from the CoA and REMMs, TfNSW Specifications, EPL and the Infrastructure Sustainability Council will be incorporated into the environmental risk assessment, particularly in developing the agreed activity specific site controls.

Potential environmental aspects and impacts associated with construction of the M12 Central package are identified in Table 4-1.

Table 4-1 Potential environmental impacts associated with construction

Environmental Aspect	Potential impact
Biodiversity	<ul style="list-style-type: none"> <li>• Direct removal of native vegetation, threatened plant species and threatened ecological communities</li> <li>• Indirect impact to native vegetation and threatened plant species through edge effects</li> <li>• Removal of fauna habitat including woodland, riparian, native and exotic grassland and aquatic habitat</li> <li>• Noise, vibration and lighting impacts to fauna.</li> </ul>
Traffic and access	<ul style="list-style-type: none"> <li>• High numbers of construction vehicle movements may temporarily affect the surrounding road network, particularly heavy vehicles</li> <li>• Site traffic resulting in changes/disruptions to local traffic movements</li> <li>• Traffic-related safety incidents during work (workers and road users) if management measures are not implemented.</li> </ul>
Noise and vibration	<ul style="list-style-type: none"> <li>• Vibration impacts to sensitive receivers (including utilities and heritage items)</li> <li>• Road traffic noise due to vehicle movements/haulage routes</li> <li>• Noise associated with physical works and type of plant and equipment proposed.</li> </ul>
Air quality	<ul style="list-style-type: none"> <li>• Dust associated with excavation including from exposed surfaces, spoil stockpiles or backfilling trenches</li> <li>• Exhaust emissions from equipment, machinery and construction vehicles.</li> </ul>
Non-Aboriginal and Aboriginal heritage	<ul style="list-style-type: none"> <li>• Direct impacts to Aboriginal sites</li> <li>• Impact on heritage items including: Fleurs Aerodrome, Cecil Park School/Post Office/Church and the Fleurs Radio Telescope</li> <li>• Unexpected impacts on unknown heritage items (e.g. archaeological items) during work.</li> </ul>

Environmental Aspect	Potential impact
Soils and water	<ul style="list-style-type: none"> <li>Erosion of soils resulting in offsite sedimentation</li> <li>Interaction with groundwater is not expected, however some locally perched systems may be encountered</li> <li>Potential disturbance, handling and disposal of contaminated material should these be identified through the unexpected finds procedure.</li> </ul>
Flooding	<ul style="list-style-type: none"> <li>Potential impacts on construction activities due to flooding.</li> </ul>
Socio-economic, land use and property	<ul style="list-style-type: none"> <li>Direct impacts on properties</li> <li>Changes to property access required due to realignment of local roads including Wallgrove Road and Clifton Avenue</li> <li>Construction and operation footprints impact urban rural residential land and businesses</li> <li>Potential changes to, or requirements for, easement arrangements for utilities.</li> </ul>
Landscape character and visual amenity	<ul style="list-style-type: none"> <li>Minor and temporary adverse visual and landscape character impacts during work on site primarily relate to residential receivers and include:</li> <li>Building removal</li> <li>Tree removal</li> <li>Visibility or overshadowing of temporary structures</li> <li>Temporary noise barriers</li> <li>Hoardings</li> <li>Visibility of ancillary facilities, including construction machinery, plant operations and site offices</li> <li>Temporary lighting.</li> </ul>
Hazard and risk	<ul style="list-style-type: none"> <li>Transport and storage of hazardous substances and dangerous goods</li> <li>Potential strikes of existing underground utilities</li> <li>Risk of bushfires</li> <li>Potential asbestos containing material finds during excavation.</li> </ul>
Resource use and waste management	<ul style="list-style-type: none"> <li>Increased demand on water supply for dust suppression during works</li> <li>Impacts associated with unexpected waste volume or types.</li> </ul>
Sustainability	<ul style="list-style-type: none"> <li>Emissions of greenhouse gases as a result of construction activities.</li> </ul>
Cumulative impacts	<ul style="list-style-type: none"> <li>Noise, amenity and traffic related impacts associated with other construction sites in proximity to the works.</li> </ul>

#### **4.1.1 Environmental Risk Assessment Workshop**

An Environmental Risk Assessment Workshop was held for the M12 Central package on the 1 July 2022 prior to construction. Participants for the workshop included representatives from:

- Seymour Whyte site management and environmental personnel
- The Environmental Representative
- TfNSW
- Western Sydney Parklands Trust
- Sydney Water
- Fairfield Council.

The Environmental Risk Assessment Workshop identified high risk activities for the M12 Central package with input from the Packages key stakeholders.

Each risk was assessed to identify the associated environmental hazards, initial risk levels, mitigation measures and to avoid, manage and/or minimise the risks and residual risks. Each of these items was documented in an environmental risk register and contained in Appendix A2. Where residual risk is assessed as high, or if required under a TfNSW specification, the ESR will develop an EWMS for that activity.

The Environmental Risk Assessment Workshop was also used to raise general awareness of good environmental management practices and site specific issues among the Seymour Whyte construction team and relevant sub-contractors working on the M12 Central package, and to develop ideas and actions to improve environmental performance.

Following the Environmental Risk Assessment Workshop, a final workshop report was submitted to TfNSW workshop including an updated M12 Central package stage-specific risk assessment.

The OCEMP will be updated as necessary by the TfNSW's ESM (or delegate).

#### **4.1.2 Ongoing risk analysis**

The ESR is responsible for ensuring that environmental risks associated with the M12 Central package are identified and included in the M12 Central Environmental Risk Register (Appendix A2) and appropriate mitigation measures are identified and implemented throughout construction.

The ESR will review and, if necessary, update of the M12 Central Environmental Risk Register on an ongoing process, including, as a minimum, when:

- A new risk has been identified
- There is a change in work systems, materials, equipment, practices or procedures on site
- There is a reportable incident
- New information about an environmental risk becomes available or where personnel raise concerns about the proposed management of an environmental risk
- At regularly scheduled times, including during CEMP Annual reviews, and at quarterly management review meetings (refer to Table 7-6).

The requirement for the regular review and update of the aspects and impacts register as part of continuous improvement is included in Table 4-2.



Where new risks are identified, these will be included in the risk register, assessed and control measures put in place to eliminate or minimise the level of risk. Monitoring and review of the effectiveness of control measures will be carried out during weekly environmental inspections and may include consultation with site personnel involved in managing the identified risks. Where required, the CEMP will also be reviewed and updated as required in accordance with the CEMP revision process outlined in Section 1.12.

## 4.2 Relevant legislation and guidelines

In accordance with NSW CoA A7, references in the terms of this Plan to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in at the date of the Infrastructure Approval (CSSI 9364).

### 4.2.1 Legislation

A register of legal requirements for the M12 Central package is contained in Appendix A1. This register will be maintained by the ESR during construction. The ESR will review the register at regular intervals, such as during management reviews (see Section 7.6.3) and will update with any applicable changes. Any changes made to the legal requirements register will be communicated to the wider Seymour Whyte project team, including sub-contractors where necessary, through toolbox talks, specific training and other methods detailed in Section 5.3.2.

### 4.2.2 Approvals, permits and licences

In accordance with NSW CoA A4, Seymour Whyte staff and its sub-contractors will comply with all written requirements or directions of the Planning Secretary. A number of approvals, permits and licenses have and/or will be obtained for the M12 Central package. The following approvals and licences have been obtained by TfNSW which are applicable to the M12 Central package:

- Infrastructure Approval under Part 5, Division 5.2 of the EP&A Act – SSI 9364 granted by the Minister for Planning on 23 April 2021
- A Commonwealth controlled action approval from the Department of Agriculture, Water and the Environment (DCCEEW now DCCEEW) under Part 8 of the EPBC Act – EPBC 2018/8286 granted by the Minister for Environment on 3 June 2021
- EPL No.21596 for the M12 Central package under Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) for 'road construction'.

Following the initial preparation of the EPL application by TfNSW, the EPL No.21596 has been transferred to Seymour Whyte. The ESR will be responsible for preparing and obtaining variations to the EPL during construction as required.

The following additional licences, approvals or exemptions will be obtained by Seymour Whyte:

- Road Occupancy Licences (ROLs) under Section 138 of the *Roads Act 1993*
- An aquifer interference approval under the *Water Management Act 2000* if construction requires intersection of a groundwater source. It is understood that a person can take up to 3 megalitres of groundwater through an aquifer interference activity per authorised project per water year without needing to obtain a water access licence
- Exemptions to allow hot works to be undertaken on Total Fire Ban days as detailed under Section 99 of the *Rural Fires Act 1997*

- Specific Resource Recovery Exemptions, where determined
- To undertake prescribed activities involving environmentally hazardous chemicals or declared chemical wastes, as detailed under s28 of *Environmentally Hazardous Chemicals Act 1985*
- For construction or use of 'work' for purposes including the taking and using of water, as detailed under S21B of the *Water Act 1912*.

At least 5 working days prior to the commencement of an activity requiring an approval, licence and/or permit from an appropriate authority, Seymour Whyte will provide to TfNSW evidence of the receipt of the approval, licence and/or permit from the relevant authority for release of the Hold Point (Section 7.6.3)

Environmental approvals, permits and licences applicable under the legislation are also noted within the register in Appendix A1.

All necessary licences, permits and approvals required for the development of the M12 Central package will be obtained and maintained as required throughout construction. No condition of the Infrastructure Approval removes the obligation for TfNSW or Seymour Whyte to obtain, renew or comply with such necessary licences, permits or approvals except as provided under Section 5.23 of the EP&A Act.

#### **4.2.3 Guidelines and standards**

The main guidelines, specifications, and policy documents relevant to this Plan include:

- Environmental Management Plan Guideline – Guideline for Infrastructure Projects (DPE, April 2020)
- Department of Infrastructure, Planning and Natural Resources Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004)
- Managing Urban Stormwater: Soils and Construction Volume 1, Landcom, (4th Edition) March 2004 (reprinted 2006) (the "Blue Book").
- Interim Construction Noise Guideline (DECC, 2009)
- Construction Noise and Vibration Guidelines (RMS, 2016)
- AS/NZS ISO 14001: Environmental Management Systems (EMS)
- AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems
- AS/NZS 4801: Safety Management Systems.
- ISO 9001: Quality Management Systems
- AS 4282-2019 Control of the obtrusive effects of outdoor lighting and
- AS/NZ 1158 – Lighting for Roads and Public Spaces
- TfNSW Environment and Sustainability Policy (January, 2020)

The guidelines and standards listed above are specifically relevant to this Plan. Relevant guidelines and standards will vary for each aspect specific Sub-plan. Specific guidelines and standards are included within Section 3 of each Sub-plan.

### 4.3 Environmental and sustainability objectives and targets

The Project is a critical component of the Western Sydney Infrastructure Plan (WSIP). WSIP is a major Australian and NSW government road investment program to improve and upgrade road infrastructure in Western Sydney. The program will deliver new and upgraded roads to support an integrated transport solution for the western Sydney region and capitalise on the economic benefits from developing the WSIA at Badgerys Creek.

The strategic aims of WSIP are:

- Development and demand – support the WSIA, land use change and residential growth; balancing functional, social, environmental and value for money considerations
- Connectivity to airport – provide a resilient connection to the WSIA site for freight and people
- Integrated network – provide road improvements to support and integrate with the broader transport network
- Customer focus – provide meaningful engagement with customers and stakeholders throughout the program life.

The Project would provide a number of benefits that are in the public interest, which include:

- Facilitate the construction and ongoing operation of the WSIA
- Accommodate future traffic growth and improve accessibility for road users accessing the Western Sydney Aerotropolis and other development projects in western Sydney
- Develop new infrastructure for public and active transport modes
- Support regional benefits related to the broader program of upgrades proposed under the WSIP, such as the provision of high capacity traffic and freight links.

The Project objectives are to:

- Provide sufficient road capacity to meet traffic demand generated by the planned western Sydney urban development
- Provide a high standard connection to the airport with capacity to meet future freight and passenger needs
- Provide a road which supports and integrates with the broader transport network
- Support the provision of an integrated regional and local public transport system
- Preserve the access function of Elizabeth Drive
- Provide active local transport within the east–west corridor
- Make provision for connection to the future Outer Sydney Orbital.

Environmental objectives and targets have been established as a means of assessing environmental performance during construction of the Project, including M12 Central package. These objectives and targets have been developed with consideration of the key issues identified through the environmental assessment and risk assessment process. The objectives and targets are consistent with TfNSW's and the Seymour Whyte's environmental policies and will assist in monitoring whether the policy commitments are being met.

The performance of the M12 Central package will be monitored against the objectives and targets and documented in the Monthly environmental reports (see Section 7.2), the six monthly Construction Compliance Reports (see Section 7.4.3) and as part of the management review (see Section 7.6.3).

Environmental objectives and targets for the M12 Central package have been incorporated into issue-specific Sub-plans. The Seymour Whyte Project Director and ESR are responsible for ensuring that the objectives and targets for the M12 Central package are achieved. A summary of objectives and targets is provided in Table 4-2.

Table 4-2: Environmental and sustainability objectives and targets

Objective	Target	Measurement tool
Construct in accordance with environmental approvals	<ul style="list-style-type: none"> <li>Full compliance with statutory approvals</li> </ul>	<ul style="list-style-type: none"> <li>Audits</li> <li>Environmental inspections</li> <li>Compliance tracking program &amp; other reporting</li> <li>Management reviews</li> </ul>
Compliance with all legal requirements	<ul style="list-style-type: none"> <li>No regulatory infringements (PINs or prosecutions)</li> <li>No formal regulatory warning</li> </ul>	<ul style="list-style-type: none"> <li>Audits</li> <li>Reporting</li> <li>Management reviews</li> </ul>
Implement a rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001	<ul style="list-style-type: none"> <li>Address non-conformances and corrective actions within specific timeframes</li> </ul>	<ul style="list-style-type: none"> <li>Audits</li> <li>Reporting</li> <li>Management reviews</li> </ul>
Engage with the affected and broader community, minimise complaints and respond to any complaints within a suitable timeframe	<ul style="list-style-type: none"> <li>Disseminate regular construction updates and other information using the Project website and through the use of other tools identified in the OCS</li> <li>Record and respond to complaints within timeframes specified in the OCS</li> </ul>	<ul style="list-style-type: none"> <li>Audits</li> <li>Complaints Register</li> <li>Reporting</li> </ul>
Continuously improve environmental performance	<ul style="list-style-type: none"> <li>Develop and maintain a program of ongoing environmental training</li> <li>Capture and disseminate lessons learnt from environmental incidents to minimise repeat issues</li> <li>Encourage and reward innovation and effort throughout the workforce</li> <li>Regular review and update of the aspects and impacts register, legal register and environmental induction</li> </ul>	<ul style="list-style-type: none"> <li>Audits</li> <li>Management review</li> <li>Training Register</li> <li>Incident Reports</li> <li>Complaints Register</li> <li>Updated CEMP and Sub-plans in response to incidents or NCRs</li> <li>Risk register</li> </ul>

Objective	Target	Measurement tool
Implement sustainability initiatives	<ul style="list-style-type: none"> <li>• Adopt sustainability leadership and continual improvement</li> <li>• Integrate governance, environmental, social and economic considerations into decision-making processes within the M12 Central package</li> <li>• Enhance positive environmental, social and economic outcomes wherever possible, while minimising adverse impacts, resource use and embodied impacts</li> <li>• Achieve a minimum 'Excellent' ISC As-Built Rating</li> </ul>	<ul style="list-style-type: none"> <li>• Measure, monitor and report on the implementation of the sustainability initiatives identified in the Construction Sustainability Management Plan</li> <li>• Utilise the ISC IS rating tool v1.2 to evaluate the sustainability performance of the quadruple bottom line (governance, economic, environmental and social) of the M12 Central package.</li> </ul>

## 5 Implementation and operation

### 5.1 Resources, roles, responsibilities and authority

This section details the roles and responsibilities of environmental personnel, including wider Seymour Whyte team members, TfNSW, the Independent Environmental Representative and Environmental Review Group. The organisational structure of these roles for the M12 Central package is shown in Figure 5-1.

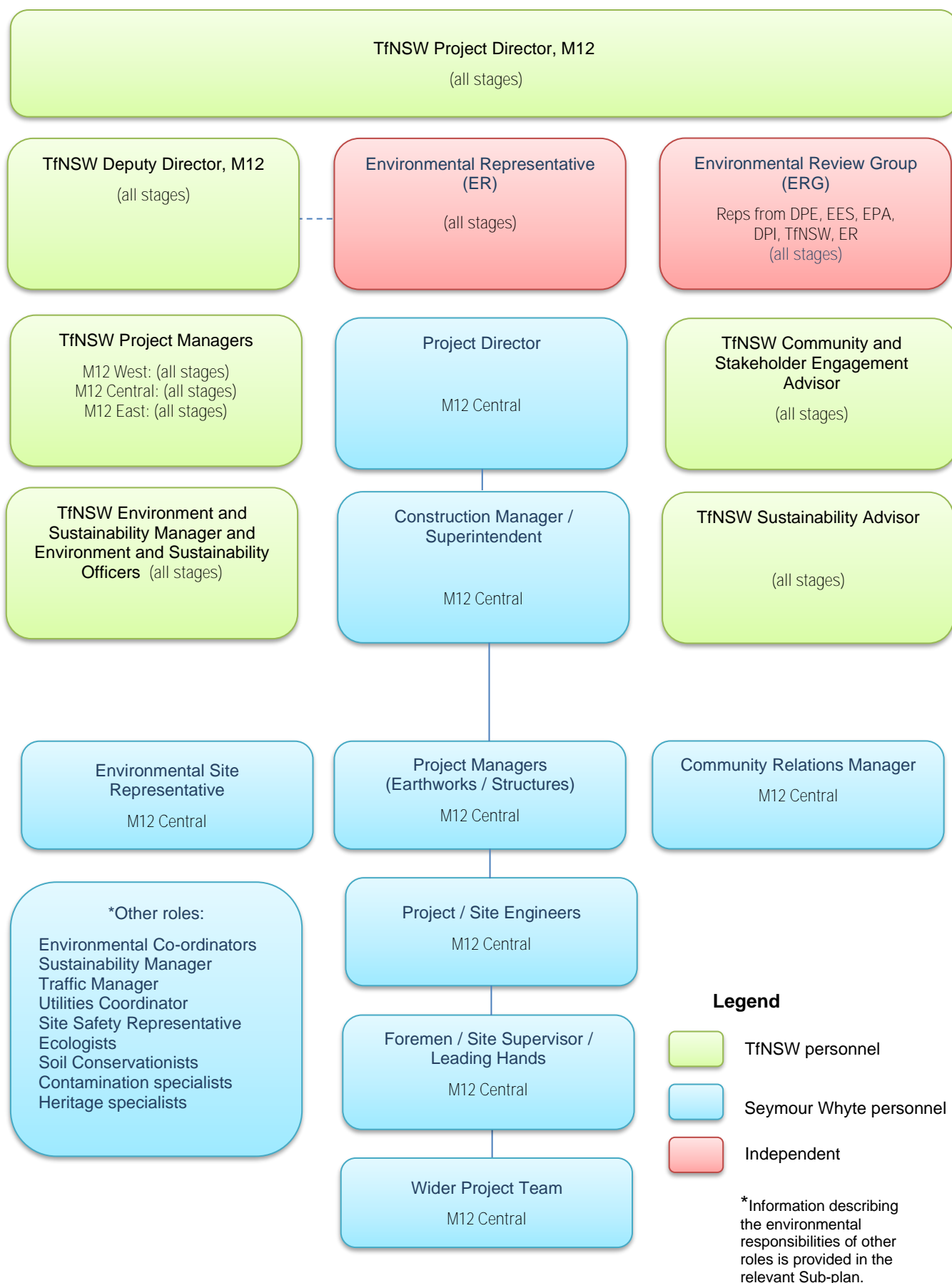


Figure 5-1: M12 Central package organisation structure



### 5.1.1 Seymour Whyte team

#### ***Environment & Sustainability Manager (Environmental Site Representative)***

The Seymour Whyte Environment and Sustainability Manager (referred to in this CEMP and Sub-plans as the Environmental Site Representative or ESR) is a member of the Senior Leadership Team and is accountable for the environmental and sustainability performance of the M12 Central package. The key authorities, responsibilities and lines of communication associated with the role are detailed in Table 5-1.

Table 5-1: Environmental and Sustainability Manager (ESR)

<b>Environmental and Sustainability Manager (ESR)</b>	
Authority	<ul style="list-style-type: none"> <li>Appointed by the Seymour Whyte Project Director and works closely with the construction and safety teams</li> <li>Authorised to collaborate and develop documentation necessary for approvals and environmental and sustainability management</li> <li>Authorised contact person for communications with TfNSW and the EPA on all environmental matters</li> <li>Authorised to take immediate action to shut down any activity, or to effect any pollution control measure, as directed by TfNSW, an authorised officer of the EPA or other relevant agencies</li> <li>All correspondence and documentation that has legal, commercial or contractual impact shall be viewed and agreed upon, by the Project Director.</li> </ul>
Responsibility	<ul style="list-style-type: none"> <li>Overall responsibility for the implementation of environmental mitigation measures on the M12 Central package</li> <li>Implementation of the CEMP</li> <li>Development, implementation, monitoring and updating of the CEMP and Sub-plans in accordance with ISO14001</li> <li>Report to the Project Director on the performance and implementation of the OCEMP and the CEMP</li> <li>Ensure management reviews of the CEMP are undertaken annually, documented and actions implemented</li> <li>Ensure environmental risks of the M12 Central package are identified ongoing and appropriate mitigation measures implemented</li> <li>Identify where environmental measures are not meeting the targets set and where improvement can be achieved</li> <li>Ensure environmental protocols are in place and managed</li> <li>Ensure environmental compliance with CoA and management plans</li> <li>Obtain and update all environmental licences, approvals and permits as required</li> <li>Liaise with the ER, the TfNSW ESM (or delegate) and approval authorities</li> <li>Work collaboratively with the Sustainability Manager (or delegate) to deliver the sustainability objectives, targets and requirements for the M12 Central package</li> <li>Manage environmental document control, reporting, inductions and training</li> <li>Manage environmental reporting within the Seymour Whyte team and to TfNSW and regulatory authorities</li> </ul>

Environmental and Sustainability Manager (ESR)	
	<ul style="list-style-type: none"> <li>• Prepare reports on a monthly basis outlining the construction works undertaken and the achievements that have been met, as well as identifying those areas where improvements were made</li> <li>• Oversee site monitoring activities, site inspections, audits and site checklists</li> <li>• Ensure monitoring records are appropriately maintained, reviewed and any non-compliance issues addressed</li> <li>• Record and provide written reports to the Construction Manager of non-conformances or corrective actions with the OCEMP and the CEMP. This may include the need to implement additional, or revise existing, mitigation measures</li> <li>• Provide reports to the Project Director on any major issues resulting from the M12 Central package</li> <li>• Assist all site staff with issues concerning M12 Central environmental matters</li> <li>• Manage all sub-contractors and consultants with regard to environmental matters, including assessing their environmental capabilities and overseeing the submission of their environmental documents</li> <li>• Develop and facilitate induction, toolbox talks, environment awareness notes and other training programs regarding environmental requirements for all site personnel</li> <li>• Notify TfNSW and relevant authorities in the event of an environmental incident and manage close-out of these</li> <li>• Assist in identifying environmental risks and advise the Construction Manager of any requirements to avoid or minimise impacts</li> <li>• Stop activities where there is an actual or immediate risk of harm to the environment, or to prevent environmental non-conformances, and advise the Project Director, Construction Manager and Project Managers</li> <li>• Assist the Community Relations Manager to resolve environment-related complaints</li> <li>• Develop, review and approve ESCPs in consultation with the Project Managers, Site Engineers, Foreman / Site Supervisor and other relevant site personnel, as required</li> <li>• Manage the day-to-day environmental elements of construction.</li> </ul>
Lines of communication	<ul style="list-style-type: none"> <li>• Member of the Senior Leadership Team</li> <li>• Primary contact on environmental and sustainability matters to Principal's Representative, and Environmental Representative</li> <li>• Primary government agency contact for planning approvals, environmental management and sustainability.</li> </ul>

### ***Environmental Coordinator***

The responsibilities of the Environmental Coordinator are detailed in Table 5-2.

Table 5-2: Environmental Coordinator

Environmental Co-ordinators	
Authority	<ul style="list-style-type: none"> <li>Appointed by the ESR.</li> </ul>
Responsibility	<ul style="list-style-type: none"> <li>Assist the ESR in the day-to-day environmental management of the works</li> <li>Ensure compliance with this Plan, Sub-plans and procedures</li> <li>Work in partnership with construction staff to build environmental capabilities, drive cultural change, and achieve performance improvements</li> <li>Assist the ESR in implementing the environmental induction program</li> <li>Assist Seymour Whyte staff with environmental inquiries</li> <li>Assist in the implementation of site environmental controls</li> <li>Conduct environmental monitoring and inspections including with the ER</li> <li>Liaise with the ER and the TfNSW ESM (or delegate)</li> <li>Assist the ESR in audits</li> <li>Assist the ESR in the investigation and close out of any environmental complaints.</li> </ul>
Lines of communication	<ul style="list-style-type: none"> <li>Functional reporting to the ESR</li> <li>Indirect reporting to Project Manager(s).</li> </ul>
Minimum Skill Levels	<ul style="list-style-type: none"> <li>Possess a relevant recognised qualification</li> <li>At least two years relevant experience</li> <li>Familiarity with current and emerging environmental issues.</li> </ul>

### **Contractor's Soil Conservationist**

The responsibilities of the Contractor's Soil Conservationist are detailed in Table 5-2.

Table 5-3: Soil Conservationist

Contractor's Soil Conservationist	
Authority	<ul style="list-style-type: none"> <li>Appointed by the ESR.</li> </ul>
Responsibility	<ul style="list-style-type: none"> <li>Review of all erosion, sediment and water pollution plans, controls and measures prior to installation</li> <li>Assistance in project training relating to erosion and sediment control issues</li> <li>Attend site for any critical and/or activities deemed high risk for erosion and sediment control management</li> <li>Attend site inspections as required, but at least monthly and prepare a report detailing findings from these inspections. Issues identified in these inspection reports must be acted on and reported to TfNSW within 5 working days.</li> <li>Work in partnership with the ESR to build environmental capabilities, drive cultural change, and achieve performance improvements</li> <li>Assist the ESR in implementing the environmental training program</li> <li>Assist Seymour Whyte staff with environmental inquiries</li> </ul>

Contractor's Soil Conservationist	
	<ul style="list-style-type: none"> <li>Assist in the implementation of site environmental controls</li> <li>Conduct environmental monitoring and inspections</li> <li>Assist the ESR in the investigation and close out of relevant complaints.</li> </ul>
Lines of communication	<ul style="list-style-type: none"> <li>Functional reporting to the ESR</li> <li>Indirect reporting to Project Manager(s)</li> <li>Liaise with any soil conservationist appointed for the Project by TfNSW.</li> </ul>
Minimum Skill Levels	<ul style="list-style-type: none"> <li>A suitably experienced external Certified Practicing Erosion and Sediment Control Professional (CPESCP) as the Soil Conservationist approved under TfNSW at category S1 or higher.</li> </ul>

### Ecologist

The responsibilities of the ecologist are detailed in Table 5-2.

Table 5-4: Ecologist

Environmental Co-ordinators	
Authority	<ul style="list-style-type: none"> <li>Appointed by the ESR.</li> </ul>
Responsibility	<ul style="list-style-type: none"> <li>Provide expert advice on biodiversity related issues</li> <li>Review and provide input to fauna handling procedures and relevant EWMS</li> <li>Conduct pre-clearing survey and provide clearing supervision in accordance with TfNSW G40</li> <li>Perform fauna handling and relocation where required</li> <li>Conduct flora and fauna surveys, weed surveys, ecological constraints assessments, monitoring and trapping where required</li> <li>Prepare detailed pre-clearing and post-clearing reports</li> <li>Review and advise on the Clearing and Grubbing Plan (CGP)</li> <li>Provide advice on reuse opportunities for hollows, tree trunks, mulch, bushrock and root balls required to be cleared for the project before any clearing activities are undertaken. Opportunities may include habitat enhancement, beneficial re-use and rehabilitation work and are to be informed by the expression of interest process detailed in G36, Clause 4.8(n)</li> <li>Work in partnership with the ESR to build environmental capabilities, drive cultural change, and achieve performance improvements</li> <li>Assist Seymour Whyte staff with environmental inquiries.</li> </ul>
Lines of communication	<ul style="list-style-type: none"> <li>Functional reporting to the ESR</li> <li>Indirect reporting to Project Manager(s)</li> <li>Liaise with any ecologist appointed for the Project by TfNSW.</li> </ul>
Minimum Skill Levels	<ul style="list-style-type: none"> <li>A suitably qualified, experienced and licenced Ecologist. The Ecologist must have qualifications and experience in fauna identification and handling, botany,</li> </ul>

Environmental Co-ordinators	
	environmental science, landscaping or bush regeneration and experience in identifying weeds and other plant species.

## Seymour Whyte – Key Personnel

Other key JV personnel with environmental responsibilities are detailed in Table 5-5.

Table 5-5: Other Key roles and responsibilities

Role	Responsibilities
Project Director	<ul style="list-style-type: none"> <li>• Ensure all works comply with relevant regulatory and Project requirements, including compliance with the approvals, EPL, REMMs, TfNSW Specifications</li> <li>• Ensure the requirements of the OCEMP and this CEMP are fully implemented, and in particular, that environmental requirements are not secondary to other construction requirements</li> <li>• Endorse and support the TfNSW and Seymour Whyte environmental policy attached at Appendix A3 of the OCEMP and CEMP respectively</li> <li>• Liaise with TfNSW, ER and other government authorities as required</li> <li>• Participate and provide guidance in the regular review of the OCEMP and the CEMP and supporting documentation</li> <li>• Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of the OCEMP / CEMP</li> <li>• Ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements</li> <li>• Ensure that complaints are investigated to ensure effective resolution</li> <li>• Stop work immediately if an unacceptable impact on the environment is likely to occur</li> <li>• Point of contact in the event of an environmental site emergency</li> <li>• 24-hour person of contact for environmental regulatory authorities.</li> </ul>
Construction Superintendent / Manager	<ul style="list-style-type: none"> <li>• Plan construction works in a manner that avoids or minimises impact to environment</li> <li>• Ensure the requirements of the OCEMP and the CEMP are fully implemented</li> <li>• Ensure construction personnel manage construction works in accordance with statutory and approval requirements</li> <li>• Support the ESR in achieving relevant environmental objectives</li> <li>• Ensure environmental management procedures and protection measures are implemented</li> <li>• Co-ordinate the implementation and maintenance of pollution control measures</li> <li>• Identify resources required for implementation of the OCEMP and the CEMP</li> <li>• Ensure all Project personnel attend an induction prior to commencing works</li> <li>• Liaise with TfNSW, the ER and government authorities as required</li> <li>• Stop work immediately if an unacceptable impact on the environment is likely to occur</li> <li>• Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the ESR</li> <li>• Point of contact in the event of an environmental site emergency</li> <li>• 24-hour person of contact for environmental regulatory authorities.</li> </ul>



Role	Responsibilities
Earthworks Project Manager	<ul style="list-style-type: none"> <li>• Deputize for Project Director as required</li> <li>• Ensure all earthworks comply with relevant regulatory and Project requirements, including compliance with the approvals, EPL, REMMs, TfNSW Specifications</li> <li>• Lead the construction staging strategy for earthworks to deliver works and minimise disruption to stakeholders</li> <li>• Co-ordinate the implementation of the OCEMP, this CEMP and EWMS</li> <li>• Develop EWMS in consultation with ESR</li> <li>• Approve work procedures for effective minimisation of risk to the environment</li> <li>• Ensuring sub-contractors and suppliers comply with this CEMP and EWMS</li> <li>• Ensuring that work is carried out in accordance with standards and specifications</li> <li>• Liaise with TfNSW, the ER and government authorities as required</li> <li>• Co-ordinate action in emergency situations and allocate required resources</li> <li>• Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and ESR</li> <li>• Support the ESR in achieving relevant environmental objectives, including on ground implementation of the EWMS and ESCP</li> <li>• Ensuring all erosion and sediment controls are implemented and maintained.</li> </ul>
Structures Project Manager	<ul style="list-style-type: none"> <li>• Deputize for Project Director as required</li> <li>• Ensure all civil infrastructure works comply with relevant regulatory and Project requirements, including compliance with the approvals, EPL, REMMs, TfNSW Specifications</li> <li>• Lead the construction staging strategy for the civil infrastructure works to deliver works and minimise disruption to stakeholders</li> <li>• Co-ordinate the implementation of the OCEMP, this CEMP and EWMS</li> <li>• Develop EWMS in consultation with ESR</li> <li>• Approve work procedures for effective minimisation of risk to the environment</li> <li>• Ensuring sub-contractors and suppliers comply with this CEMP and EWMS</li> <li>• Ensuring that work is carried out in accordance with standards and specifications</li> <li>• Liaise with TfNSW, the ER and government authorities as required</li> <li>• Co-ordinate action in emergency situations and allocate required resources</li> <li>• Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and ESR</li> <li>• Support the ESR in achieving relevant environmental objectives, including on ground implementation of the EWMS and ESCP</li> <li>• Ensuring all erosion and sediment controls are implemented and maintained.</li> </ul>
Community Relations Manager	<ul style="list-style-type: none"> <li>• Ensure that all community consultation activities are carried out in accordance with the overarching and M12 Central Communication and Stakeholder Engagement Strategy</li> <li>• Report any environmental issues to the ESR raised by stakeholders or members of the community</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>Communicate general Project and M12 Central package progress, performance and issues to stakeholders including the community</li> <li>Maintain the 24 hour complaints hotline</li> <li>Maintain the complaints register in accordance with the Complaints Management System.</li> <li>Liaise with the ER in relation to community and stakeholder complaints.</li> </ul>
Project/Site Engineers	<ul style="list-style-type: none"> <li>Provide input into the preparation of environmental planning documents as required</li> <li>Ensure that instructions are issued and adequate information provided to employees that relate to environmental risks on-site</li> <li>Ensure that the works are carried out in accordance with the requirements of the OCEMP and the CEMP and supporting documentation, including implementation of all environmental controls</li> <li>Identify any environmental risks</li> <li>Identify resource needs for implementation of OCEMP and CEMP requirements and related documents</li> <li>Ensure that complaints are investigated to ensure effective resolution</li> <li>Take action in the event of an emergency and allocate the required resources to minimise the environmental impact</li> <li>Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Construction Manager and ESR.</li> </ul>
Site Supervisors	<ul style="list-style-type: none"> <li>Undertake any environmental duties as defined by the Construction Manager or Project/Site Engineers</li> <li>Control field works and implement/maintain effective environmental controls</li> <li>Where required, undertake environmental risk assessment of works prior to commencement</li> <li>Ensure site activities comply with EWMS and relevant records are kept</li> <li>Ensure all site workers are site inducted prior to commencement of works</li> <li>Attend to any spills or environmental incidents that may occur on site</li> <li>Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Construction Manager</li> <li>Stop activities where there is an actual or immediate risk of harm to the environment and advise the Project Manager, Construction Manager or ESR.</li> </ul>
Project Team (including sub-contractors)	<ul style="list-style-type: none"> <li>Comply with the relevant requirements of the OCEMP and CEMP, or other environmental management guidance as instructed by a member of Seymour Whyte management team</li> <li>Participate in the mandatory M12 Central package induction program</li> <li>Report any environmental incidents to the Site Supervisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident</li> <li>Undertake remedial action as required to ensure environmental controls are maintained in good working order</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>Stop activities where there is an actual or immediate risk of harm to the environment and advise the Project Manager, Construction Manager, Foreman/ Site Supervisor or ESR.</li> </ul>
Sustainability Manager	<ul style="list-style-type: none"> <li>Ensure the development and implementation of the Sustainability Management Plan for the M12 Central package</li> <li>Ensure the development, implementation and verification of sustainability measures are carried out for all construction works</li> <li>Support the Project Manager in achieving sustainability objectives, targets and requirements</li> <li>Manage the Sustainability Induction and Training Program for relevant personnel</li> <li>Ensure relevant sustainability personnel are capable and suitably skilled to undertake designated sustainability responsibilities</li> <li>Assist and support the Construction Manager to ensure the sub-contractors fulfill sustainability obligations, targets and requirements</li> <li>Monitor progress of sustainability targets and ensure actions are initiated and performed throughout the M12 Central package</li> <li>Co-ordinate and prepare the sustainability initiative progress reports for TfNSW.</li> </ul>

### 5.1.2 TfNSW roles

Roles and responsibilities of TfNSW personnel, as relevant to the construction of the M12 Central package is provided in Table 5-6.

Table 5-6: Roles and responsibilities of TfNSW personnel on M12 Central package

Role	Responsibilities
TfNSW Project Director, M12	<ul style="list-style-type: none"> <li>Evaluate and advise on high-risk compliance issues relating to Seymour Whyte and TfNSW environmental requirements</li> <li>Provide Seymour Whyte management with environmental advice and/or directions, in consultation with TfNSW environmental staff.</li> </ul>
TfNSW Utilities Manager	<ul style="list-style-type: none"> <li>Evaluate and advise on high risk compliance issues relating to Seymour Whyte and TfNSW environmental requirements</li> <li>Review and endorse documentation to be submitted to the Planning Secretary of DPE (now NSW DPHI and NSW DCCEEW) and the Commonwealth Minister of the Environment for approval</li> <li>Have oversight of the review and approve the CEMP in consultation with TfNSW environmental staff and the ER</li> <li>Provide Seymour Whyte management with environmental advice and/or directions, in consultation with TfNSW environmental staff</li> </ul>
TfNSW Delivery Manager	<ul style="list-style-type: none"> <li>Evaluate and advise on high risk compliance issues relating to Seymour Whyte and TfNSW environmental requirements</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>Review and endorse documentation to be submitted to the Secretary of DPE (now NSW DPHI and NSW DCCEEW) and the Commonwealth Minister of the Environment for approval</li> <li>Have oversight of the review and approve the CEMP in consultation with TfNSW environmental staff and the ER</li> <li>Provide Seymour Whyte management with environmental advice and/or directions, in consultation with TfNSW environmental staff.</li> </ul>
TfNSW Project Managers	<ul style="list-style-type: none"> <li>Evaluate and advise on compliance with TfNSW environmental requirements</li> <li>Review and approve the CEMP in consultation with TfNSW environmental staff and the ER</li> <li>Provide Seymour Whyte staff with environmental advice and/or directions, in consultation with TfNSW environmental staff.</li> </ul>
TfNSW ESM and Environment and Sustainability Officers	<ul style="list-style-type: none"> <li>Review the CEMP and related documents prepared for the M12 Central package</li> <li>Review and consider minor refinements that are consistent with the Project Environmental Assessment Documentation in accordance with the TfNSW EP&amp;A Act Part 5.1 environmental assessment procedure</li> <li>Monitor the environmental performance of the M12 Central package in relation to TfNSW requirements</li> <li>Provide guidance and where appropriate, monitor compliance with DPE (now NSW DPHI and NSW DCCEEW) post approval document submission requirements.</li> </ul>

### 5.1.3 Independent Environmental Representative

In accordance with NSW CoA A30, an Independent Environmental Representative (ER) must be approved by the Planning Secretary prior to the commencement of work. An ER was approved by the Planning Secretary on 3 May 2021. The environmental responsibilities of the ER for the Project are detailed in NSW CoA A34 and include:

- Receive and respond to communication from the Secretary in relation to the environmental performance of the Project
- Consider and inform the Secretary on matters specified in the terms of the Infrastructure Approval
- Consider and recommend to TfNSW and Seymour Whyte any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community
- Review documents identified in NSW CoA A9, A13, A16, A24, C1, C4 and C11 and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under the Infrastructure Approval and if so:
  - Make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary) or

- make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Secretary/Department for information or are not required to be submitted to the Secretary/Department)
- Regularly monitor the implementation of the documents listed in NSW CoA A9, A13, A16, A24, C1, C4 and C11 to ensure implementation is being carried out in accordance with the document and the terms of the Infrastructure Approval
- As may be requested by the Secretary, help plan, attend or undertake audits of the Project commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under NSW CoA A38 and A41
- As may be requested by the Secretary, assist the Department in the resolution of community complaints
- Assess the impacts of minor construction ancillary facilities comprising lunch sheds, office sheds and portable toilet facilities as required by NSW CoA A20
- Consider any minor amendments to be made to the OCEMP, CEMP, CEMP Sub-plans, Construction Monitoring Programs and SEMP's that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and the documents approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of the Infrastructure Approval
- Prepare and submit to the Planning Secretary and relevant regulatory agencies, for information, an ER Monthly Report providing the information set out in the ER Protocol under the heading "Environmental Representative Monthly Reports." The ER Monthly Report must be submitted within seven days following the end of each month for the duration of the ER's engagement for the Project.

To assist the ER in undertaking its role, Seymour Whyte will:

- Facilitate ER inspections (refer to Section 7.1.2)
- Notify the ER of any environmental incidents and identify any incident with significant off-site impacts on people or the biophysical environment which will be reported to the Planning Secretary
- Provide the ER with all information and documents, allow the ER to attend meetings and audits of this Plan and access such premises as may be necessary or reasonably required by the ER to allow the ER to perform its functions under the Infrastructure Approval
- Update this Plan to address any relevant requirements and recommendations of the ER
- Review and analyse the cause of any non-conformances raised by the ER and develop a plan of corrective action to minimise the likelihood of recurrence
- Comply with the lawful requirements of the ER, so as to allow the ER to discharge any functions under the Infrastructure Approval.

#### **5.1.4 Environmental Review Group**

The Environmental Review Group (ERG) comprises:

- The ER
- Representatives of TfNSW

- Representatives of Seymour Whyte
- Regulatory authorities, including
  - Environment Protection Authority (EPA)
  - Environmental, Energy and Science (EES)
- Relevant local councils, including:
  - Penrith City Council
  - Liverpool City Council
  - Fairfield City Council.

The purpose of the ERG is to ensure prompt and effective consultation and resolution of environmental issues raised by or affecting Government agencies, Council(s), TfNSW, the community and Seymour Whyte. The role of the ERG is to work collaboratively with the Project teams for each work package to provide proactive advice on environmental management issues on the Project and review the environmental performance of the Project, including M12 Central package. The ERG will be maintained for the duration of the Project and will meet monthly (or as otherwise agreed by the regulatory agencies and TfNSW) and undertake environmental inspections. Relevant Seymour Whyte personnel including the Project Manager and ESR will attend the ERG meetings.

#### 5.1.5 Regulator roles

The environmental responsibilities of Regulators are provided in Table 5-7.

Table 5-7: Regulator roles and responsibilities

Role	Responsibilities
DPE (now NSW DPHI and NSW DCCEEW)	<ul style="list-style-type: none"> <li>• Assessing compliance with the Concept Plan and Project Approval</li> <li>• Assessing and approving any documents under the Project Approval which require the specific approval</li> <li>• Assessing any proposed modifications to the Project Approval that are not consistent with the Project Approval</li> <li>• Liaising with TfNSW during fortnightly meetings.</li> </ul>
EPA	<ul style="list-style-type: none"> <li>• Providing comment on the environment and planning documents as specified in the Infrastructure Approval</li> <li>• Provision of review and comment, where applicable, to incident reports for potential or actual environmental harm.</li> </ul>
DCCEEW	<ul style="list-style-type: none"> <li>• Assessing compliance with Commonwealth CoA</li> <li>• Liaison with TfNSW with regard to Protected Matters.</li> </ul>

## 5.2 Sub-contractor management

The Seymour Whyte Project Director and ESR will be responsible for environmental performance of all sub-contractors. Subcontractors will be provided with detailed contracts and information



packages before works commence that define environmental and sustainability obligations. Contracts will also clarify duties that the Seymour Whyte team will retain for environmental protection of the subcontracted work. Compliance obligations will be reinforced through training programs (e.g. inductions) and role specific training (refer to Section 5.3).

The ESR (or delegate) will participate in the tender assessment and selection process where it is deemed necessary due to associated environmental risks. All sub-contractors are required to complete a sub-contractor questionnaire or similar. As part of the sub-contractor selection process, consideration will be given to past environmental performance.

When engaging sub-contractors, Seymour Whyte will:

- Reflect relevant CoA, environmental management requirements, sustainability requirements and obligations of the TfNSW specifications in the planning, selection and management of sub-contractors
- Ensure sub-contractors are advised in writing of the environmental requirements and the CoA and any other applicable Authority requirements, prior to commencing any work
- Undertake a review of sub-contractors' documentation to verify compliance with the CEMP
- Undertake a review of the sub-contractors proposed work methodology and review against the requirements of the OCEMP, this CEMP and associated Sub-plans
- Where required, sub-contractors will be required to support the development of Environmental Work Method Statements (EWMS), Noise and Vibration Impact Statements (NVIS) and/or other approval documents prior to works
- Undertake appropriate monitoring of each sub-contractors environmental protection measures together with the relevant project documentation to ensure that the specified environmental protection requirements are effectively implemented and maintained.

All sub-contractors are required to work in accordance with the approved OCEMP and the CEMP. These obligations are monitored by the ESR and wider Seymour Whyte team through inspections, monitoring, audits and reporting requirements (refer to Section 7).

All sub-contractors are required to attend the M12 Central project induction where the requirements and obligations of the OCEMP and the CEMP are communicated. A record of all sub-contractors inducted will be maintained as part of the M12 Central package induction and training register.

Seymour Whyte will regularly review and keep a record of the sub-contractor's:

- General work practices
- Effectiveness of planned and implemented environmental protection measures
- Compliance with the requirements of the OCEMP and this CEMP
- Maintenance of environmental measures.

All environmental documentation submitted by sub-contractors will be subject to review and approval by Seymour Whyte personnel to ensure compliance with TfNSW contract requirements and the CoA, EPL, REMMs and TfNSW Specifications before works may begin.

## 5.3 Competence, training and awareness

To ensure that the OCEMP and this CEMP are effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of the OCEMP and this CEMP. The ESR will coordinate the environmental training in conjunction with other training and development activities (e.g. safety).

All Seymour Whyte staff and subcontractor personnel (including plant operators and truck drivers) working on the site will be provided with environmental training to achieve a level of competence and awareness appropriate to their assigned activities before they commence their assigned activities. No one is permitted to work on the M12 Central package who has not undergone the appropriate environmental training to work on the site.

### 5.3.1 Environmental induction

All personnel (including sub-contractors) are required to attend a compulsory site induction that includes an environmental component before commencement on-site. This is undertaken to ensure all personnel involved in the M12 Central package are aware of the requirements of the OCEMP and this CEMP.

Short-term visitors to site undertaking inspections/entering the site (such as regulators) will be required to undertake a visitor's induction and be accompanied by inducted personnel at all times.

Temporary visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.

The ESR (or delegate) will conduct the environmental component of the site inductions. The environmental component of the induction will cover relevant elements of the OCEMP and this CEMP and include:

- Relevant details of the OCEMP, this CEMP, including all Sub-plans, procedures and strategies, their purpose and objectives
- Requirements of due diligence and duty of care
- Relevant legislation, CoA, conditions of environmental licences, permits and approvals
- Potential environmental emergencies on-site and the emergency response procedures
- Incident notifications and requirements of the PIRMP (Appendix A9)
- Reporting and notification requirements for pollution and other environmental incidents
- Key environmental issues
- Mitigation measures for the control of environmental issues
- Complaints response and reporting
- High risk activities and associated environmental safeguards and EWMS
- Site specific environmental management requirements and responsibilities
- Incident and emergency response and reporting requirements
- A briefing on the use of spill kits
- Information relating to the location of environmental constraints
- SAPs

- Environmentally sensitive locations and no-go/exclusion zones
- Site flagging protocol
- Erosion and sediment controls, water quality controls, sediment basin management and dewatering activities
- Minimising light pollution on sensitive receivers, including adjacent vegetation from construction ancillary facilities and during night works
- Management of contaminated material (including asbestos impacted material)
- Location of identified potential contaminated land sites
- Signs of contaminated soil, including visual asbestos identification protocols
- Procedure for unexpected finds of contaminated land, asbestos, or human remains
- Groundwater management
- Mulch and tannin management
- Stockpile location criteria
- Working near or in drainage lines and creeks
- Location of acid sulfate soils or potential acid sulfate soils
- Obligation to report and the process for reporting environmental issues on-site including damaged environmental controls
- Obligations under the *Biosecurity Act 2015* to prevent the spread of weeds during Construction
- Responsibilities under the *National Parks and Wildlife Act 1974*, including the need to cease work immediately and report any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations
- Responsibilities under the *Heritage Act 1977* if an object of potential Non-Aboriginal heritage is uncovered during construction
- Responsibilities under the POEO Act, other relevant legislation and the EPL
- Location of identified Aboriginal and non-Aboriginal archaeological heritage sites, areas of cultural sensitivity and areas of archaeological potential and the kinds of historical relics, structures or deposits which may be encountered during the construction works
- Responsibilities under the *Contaminated Land Management Act 1997*
- Noise, vibration and air quality management controls
- Standard construction hours, approved standard hours and the process for seeking approval for out of hours works, including consultation
- Noise management measures during night works
- Location of noise, vibration and air quality sensitive receivers
- Road safety
- Road occupancy and other temporary and interim traffic arrangements
- Response procedure for dealing with traffic incidents

- Requirement to maintain surrounding property access for residences, business owners, and their visitors, and to minimise disruptions to these properties for the duration of construction
- Location of refuse bins, washing, refuelling and maintenance of vehicles, plant and equipment
- Waste minimisation principles, waste reporting and waste/recycle storage requirements
- Best practice energy efficiency
- Equipment start up and shut down procedures
- Sustainability management measures and initiatives
- Boundaries for vegetation clearing, fauna and fauna habitat management, including awareness of threatened fauna species and fauna rescue and obligations under the EPBC Act and Biodiversity Conservation Act 2016
- Weed control measures
- Specific species likely to be affected by the construction works and how these species can be recognised
- Specific responsibilities for the protection of flora and fauna
- Overview of M12 Central package ISC requirements.

A record of all environment inductions will be maintained in an induction and training register and kept on-site. The training register will identify who is trained, when trained, the trainer and what they were trained in.

Refresher environmental awareness training will be provide as required, based on the environmental risk assessment and turnover of personnel. Refresher environmental awareness training will be included on the register of environmental training.

The ESR may authorise amendments to the site induction where required to address Project modifications, legislative changes or amendments to the OCEMP or CEMP. Drafts of all environmental induction and/or online materials must be provided to TfNSW for endorsement at least 10 working days before it is planned to be used for release of the Hold Point (Section 7.6.3).

The ER will review and endorse the induction program before the induction is delivered and will monitor its implementation.

### **5.3.2 Toolbox talks, training and awareness**

Toolbox talks will be used to raise awareness and educate personnel on construction-related environmental issues. Toolbox talks are used to ensure environmental awareness continues throughout construction.

Toolbox talks will be tailored to specific environmental issues relevant to upcoming work, including (but not limited to):

- Incident notification requirements
- Erosion and sedimentation control
- Management of waste concrete
- Management of water/ concrete during pilling activities

- Dewatering
- Hours of work
- Emergency and spill response
- Aboriginal and non-Aboriginal heritage
- Threatened species and ecological communities
- Clearing controls and vegetation protection
- Weed management
- Dust control
- Minimising light pollution during night works
- EWMS, for relevant personnel
- Lessons learnt from other projects, where relevant
- Incident alerts, where relevant.

Toolbox talk attendance is mandatory and attendees of toolbox talks are required to sign an attendance form and the records maintained.

Toolbox talks which identify environmental issues and controls are to be held when works commence in a new area of the site, or a new activity, or when environmental issues arise on site. The toolbox talk must include but not be limited to:

- A description of the activity and the area
- Identification of the environmental issues and risks for the area (including fauna or flora)
- An outline of the mitigation measures for the works and the area.

Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. Topics covered may include those detailed above, or others deemed necessary in the lead up to or during construction. Workers responsible for carrying out activities managed under an EWMS must undertake a toolbox talk on the requirements of the EWMS.

Awareness notes, in the form of posters, booklets, or similar will be developed and distributed to the Construction Manager, Project Engineers, Foreman / Site Supervisor and other personnel with a responsibility for managing specific work locations or activities. This documentation will be distributed to the broader construction workforce through daily pre-starts meetings and made available in site offices/break facilities.

For some activities required to be carried out under this CEMP and Sub-plans, as detailed in the relevant sections of these documents, an appropriate level of training is necessary to ensure that the activity is suitably implemented. This includes, but not limited to:

- Noise and vibration monitoring
- Air quality monitoring
- Water quality monitoring
- Development of ESCPs

- Fauna rescue
- Pre-clearing surveys
- Pre and post condition surveys
- Heritage works.

The ESR will review and approve the training program and monitor implementation.

### **5.3.3 Daily Pre-Start meetings**

Daily pre-start meetings are used to inform the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the work, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

The Foreman / Site Supervisor will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift.

The environmental component of pre-start meetings will include any environmental issues that could potentially be impacted by, or impact on, the day's activities. All attendees will be required to sign on to the pre-start meeting and acknowledge their understanding of the issues explained.

Pre-start meeting topics, dates delivered, and a register of attendees will be recorded by the ESR and the records maintained.

### **5.3.4 Communications training**

All staff (including plant operators and truck drivers) and sub-contractor personnel working on the delivery of the M12 Central package will be required to behave in a courteous and professional manner when in dialogue with any community member. All personnel will be:

- Trained on how to respond to community queries
- Aware of and abide by the requirements for the release of information
- Advised on the identity of the community within which they are working prior to their involvement in the work activities.

Community involvement obligations will be included in the site induction.

## **5.4 Working hours**

### **5.4.1 Hours of work**

In accordance with TfNSW specification G1, the contractual working days and nights of work 'standard construction hours' for the M12 Central package are between 7:00 am to 6:00 pm Monday to Friday inclusive but excluding public holidays and rostered days off.

In accordance with NSW CoA E34 and the EPL condition L5.1, the approved standard hours are:

- 7:00 am to 6:00 pm Monday to Friday
- 8:00 am to 6:00 pm Saturday
- At no time on Sunday or public holidays.



Applications to work between 8:00am and 6:00pm on Saturdays (the allowable work hours on Saturdays identified in the Infrastructure Approval) must be submitted to the TfNSW no later than 5 days immediately prior to the Saturday proposed to undertake work. The application must include the details of the work activities to be undertaken and use the form provided in the OOHW Protocol (Appendix C). Approval is at the discretion of TfNSW.

As required by NSW CoA E35, except as permitted by an EPL, highly noise intensive works that result in an exceedance of the applicable noise management level at the relevant receiver must only be undertaken:

- Between 8:00 am to 6:00 pm Monday to Friday
- Between 8:00 am to 1:00 pm Saturday
- In continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block.

‘Continuous’ includes any period during which there is less than a one hour respite between ceasing and recommencing the work.

All conditions relating to construction hours outlined in the EPL will be complied with.

#### **5.4.2 Variation to work hours**

Works associated with the delivery of the M12 Central package may be undertaken outside the hours of work identified in Section 5.4.1 in the following circumstances, in accordance with NSW CoA E36:

- Safety and emergencies
  - For the delivery of materials required by the NSW Police Force or other authority for safety reasons; or
  - Where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent material environmental harm.

On becoming aware of the need for emergency works, the ESR (or delegate) will notify the TfNSW Project Manager, the Planning Secretary, the ER and the EPA of the need for those works. The construction team will use its best endeavours to notify all affected sensitive receivers of the likely impact and duration of those works.

- Work that causes:
  - LAeq(15 minute) noise levels:
    - No more than 5 dB(A) above the rating background level at any residence in accordance with the *Interim Construction Noise Guideline (DECC, 2009)* and
    - No more than the ‘Noise affected’ NMLs specified in Table 3 of the ICNG at other sensitive land user(s) and
  - LAFmax(15 minute) noise levels no more than 15 dB(A) above the rating background level at any residence during the night time period and
  - Continuous or impulsive vibration values, measured at the most affected residence, that are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of *Assessing Vibration: a technical guideline (DEC, 2006)* and

- Intermittent vibration values measured at the most affected residence that are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006).
- By Approval, including:
  - Where different construction hours are permitted or required under an EPL in force in respect of the Project; or
  - Works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by NSW CoA E37 (Appendix C in Appendix B2); or
  - Negotiated agreements with directly affected residents and sensitive land uses.

An Out of Hours Work (OOHW) Protocol (Appendix C in Appendix B2) has been prepared in accordance with the *Construction Noise and Vibration Guidelines (Roads and Maritime, 2016)*. The OOHW Protocol has been prepared to address the requirements of NSW CoA E37 and the EPL relating to OOHW and includes:

- Identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:
  - the ER reviews all proposed out-of-hours activities and confirm their risk levels
  - low risk activities can be approved by the ER
  - high risk activities that are approved by the Planning Secretary.
- A process for the consideration of OOHW against the relevant NML and vibration criteria
- A process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of NSW CoA E47. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land user(s) would be exposed to, including the number of noise awakening events
- Procedures to facilitate the coordination of OOHW including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided
- Notification arrangements for affected receivers for all approved OOHW and notification to the Secretary of approved low risk OOHW.

The OOHW Protocol will be prepared in consultation with the ER and approved by the Planning Secretary before commencement of work out of standard hours.

## 5.5 Communication

### 5.5.1 Internal Communication

The environment team will meet regularly to discuss any issues with environmental management on-site, any amendments to plans that might be required or any new/changes to construction activities. Regular meetings will also occur with the ER and TfNSW environment staff. These meetings will discuss ongoing environmental performance and identify any issues to be addressed.

In addition, environment team members will participate in regular toolbox talks to communicate on environmental performance, advise on any upcoming sensitive environmental matters for future work areas and to receive feedback from on-site personnel.

Further internal communications regarding environmental issues and aspects will be through awareness training and pre-start meetings as described in Section 5.3.

### **5.5.2 Liaison with EPA, government authorities or other relevant stakeholders**

Seymour Whyte will notify TfNSW of its proposed commencement of construction or stages of construction (if further staging proposed), who will notify DPE in writing of the date of commencement of construction (or stage as relevant) of the M12 Central package at least one month before commencement of which the notification applies. TfNSW will also notify DCCEE in writing of the date of commencement of the action within 10 business days after the date of commencement of the action to which the Commonwealth approval applies.

The ESR will be the main point of contact regarding specific environmental issues. The ESR is responsible for reporting on the ongoing environmental performance of the M12 Central package to TfNSW, the ER and EPA. The ESR will report regularly to TfNSW on progress and any key environmental matters, and to the EPA through monthly EPL reports.

Two Project team members have been nominated as 24-hour contacts for environmental regulatory authorities and are identified in the “List of emergency and key contacts”. They have the authority to halt the progress of the work if necessary, and are the key emergency response personnel during an environmental site emergency.

TfNSW will be immediately notified on each occasion that the site is visited by EPA and/or other relevant agencies. The ESR (or delegate) will prepare a report for each occasion when the site is visited by the EPA and/or other relevant agencies, notifying TfNSW of the purpose and outcome of the EPA and/or other relevant agencies visit, and of all actions taken by the Seymour Whyte in response to the EPA visit and/or other relevant agencies. The report will be provided to TfNSW within one working day of the visit.

Relevant government authorities will be consulted throughout construction through their involvement in regular ERG meetings. These meetings will discuss environmental performance, upcoming work, high risk activities and will include inspections of the work sites as required.

The ESR will report to the EPA in the event of an occurrence or set of circumstances that causes or threatens to cause material harm.

### **5.5.3 Community liaison and/or notification**

#### ***Overarching Communication Strategy***

TfNSW has prepared an Overarching Communication Strategy (OCS) in accordance with the requirements of NSW CoA B1 to document the approach to stakeholder and community communications for the Project. The OCS identifies opportunities for providing information and consulting with the community and stakeholders during the construction of the Project.

The OCS was approved by the Planning Secretary on 7 July 2021, as required by NSW CoA B3.

The OCS includes:

- Principles to guide the overall approach to community and stakeholder involvement
- Identification of the stakeholders and groups to be consulted during the Project

- Procedures and tools for the distribution of information about the Project, such as regular updates about construction activities, the program for construction activities and key milestone dates.
- A process for communication with adjacent/nearby developments for the management of potential cumulative impacts or emissions (noise, air or odour) from their sites
- Opportunities for the community to visit Project construction sites
- Methods for involving construction personnel in engaging with the local community
- Methods and tools for engaging with the local community, including community forums to discuss key environmental management issues of concern for the Project
- Procedures and mechanisms:
  - Detailing how the community can discuss or provide feedback in relation to the Project
  - Detailing how the Project team will respond to community enquiries and feedback
  - Describing how issues will be resolved or disputes mediated in relation to environmental management and construction of the Project.
- Procedures to consult with local communities potentially affected by the impacts of multiple projects in addition to the Project.

The OCS also provides details on the requirements for coordination and communication between the Construction Contractors working on the Project stages which will include:

- Liaison meetings
- Mailing list for all communications (including community updates)
- Email communication
- Project briefings.

Where relevant, the TfNSW Community and Stakeholder Engagement Advisor and the Community Relations Manager will undertake consultation with proponents of other nearby developments to increase the overall awareness of Project / M12 Central package timeframes and impacts.

A range of communication tools are also defined in the OCS, and may include:

- Targeted community open days
- Media releases and advertisements in local and metropolitan papers
- Public displays
- Door-knocks
- Letterbox drops
- Community update newsletters, information brochures and fact sheets
- Community information sessions and community forums
- Signage at construction sites
- Construction updates (including for councils, emergency services and bus operators)
- Project website
- Project 1800 number, email address and postal address.

The OCS will be implemented for the duration of the M12 Central package through the implementation of the M12 Central Community and Stakeholder Engagement Plan (CSEP).

### ***M12 Central Community and Stakeholder Engagement Plan***

Seymour Whyte will support the implementation of the OCS and in meeting the community relations obligations of the Infrastructure Approval during the delivery of the M12 Central package through the implementation of the CSEP.

The CSEP, which has been developed under and consistent with the OCS, details the procedures and processes for community notification, consultation and complaints management for the M12 Central package. It provides a targeted approach to achieving the objectives of the OCS and aligns with the M12 Central package EMS.

The CSEP:

- Guides Seymour Whyte's interactions with stakeholders and the community
- Responds to requirements for community and stakeholder liaison throughout the delivery of the M12 Central package
- Ensures Seymour Whyte will partner with TfNSW and other package contractors to coordinate stakeholder engagement and community consultation activities
- Supports the M12 Central package certainty of delivery by ensuring consistent standards of stakeholder and community liaison.

The objectives of the CSEP are to:

- Establish and build genuine relationships with stakeholders and the community to increase support and understanding of the M12 Central package and to encourage sustainable and accessible community ownership and participation
- Minimise where possible, impacts on stakeholders and the community
- Actively manage impacts and disruption to stakeholders and the community
- Appropriately address stakeholder issues
- Ensure a "no surprises" approach exists where commitments to the community are met or bettered at all times
- Ensure stakeholders and the community fully understand the activities to be undertaken by Seymour Whyte, potential impacts and expected outcomes
- Communicate early and often.

As part of the CSEP, a complaints management system, compliant with the TfNSW approved complaints management system, is to be provided for TfNSW approval in accordance with TfNSW Specification GS61.

The CSEP will be implemented for the duration of the M12 Central package.

### ***Complaints Management***

TfNSW has developed a Complaints Management System (CMS) to document the overall approach to complaints management for the Project, including M12 Central package. The CMS will be consistent with AS-ISO 10002-2006 Complaints Handling in accordance with the requirements

of NSW CoA B6 to B9. Seymour Whyte will adopt the requirements of the CMS, including reporting requirements and will provide the necessary assistance to TfNSW for the reporting of complaints.

The CMS has been provided to the Planning Secretary for information as part of the OCS before any work commencing on the Project.

All community enquiries and complaints related to the construction activities will be referred to the 24-hour toll free community information line (1800 517 155). The Project postal address (Transport for NSW, PO Box 973 Parramatta CBD NSW 2124) and email address (m12motorway@rms.nsw.gov.au) are also available for receipt of enquiries and complaints.

Details of the telephone number, postal address and email address for enquiries and complaints related to the Project will be on the Project website, one month before the commencement of work, as required under NSW CoA B7.

The CMS includes a Complaints Register in accordance with NSW CoA B8 which will record the details of all complaints relating to the M12 Central package including the following as a minimum:

- Date and time of the complaint
- Method by which the complaint was made
- Any personal details of the stakeholder
- Number of people affected in relation to a complaint
- Nature of the complaint
- Action taken in relation to the complaint, means by which the complaint was addressed and any follow up
- Whether resolution was reached, with or without mediation
- If no action taken, reasons why
- The status of resolution of the complaint.

The Seymour Whyte Community Relations Manager (or delegate) will be responsible for providing information to TfNSW to assist with the updates of the Complaints Register. The Complaints Register will be provided to the Planning Secretary on request in accordance with NSW CoA B9. In accordance with NSW CoA A35(a), the Complaints Register will be provided to the ER on the day complaints are received.

Once complaints have been received and allocated to the M12 Central package by TfNSW, attempts will be made to resolve complaints in accordance with the CMS. Figure 5-2 provides a flow chart of the complaints management process provided in the CMS. All complaints will be investigated and the source of the complaint determined immediately, with a phone call made to the complainant (when received by phone) by the Seymour Whyte Community Relations Manager (or delegate) within two hours. An initial response will be provided during this phone call, unless the complainant agrees otherwise.

An initial written response to email complaints will be provided within 24 hours (or during the next business day if received out-of-hours) and a resolution provided within seven business days, if the complaint cannot be resolved in the initial contact.

The complainant will be kept informed and updated of the progress until the complaint is resolved. The complainant has the right to contact the Project to access personal information held about



them and to correct or amend that information (Collection Statement). For any complaints made in person the complainant must be made aware of the Collection Statement.

For any complaints or inquiries which are received (e.g. via the complaints line or email) and allocated to the M12 Central package for resolution, details will be uploaded to TfNSW's cloud based database – Consultation Manager. Complaints will be recorded in the Complaints Register (within Consultation Manager) within 24 hours. Inquiries will be recorded in Consultation Manager, but are not classified as complaints. A maximum of seven business days should be taken to respond to an inquiry.

The Seymour Whyte Community Relations Manager (or delegate) will inform TfNSW once a complaint has been resolved and if not resolved escalate to the TfNSW Community and Stakeholder Engagement Advisor for further resolution. An initial internal escalation process will be followed for the resolution of complaints which requires escalation to the TfNSW Communication and Stakeholder Engagement Advisor and TfNSW Project Director and following that to the next level which includes the ER as per the Complaints Management Process (see Figure 5-2).

TfNSW will set up a mediation system for complaints unable to be resolved. The mediation system will be available for the duration of the M12 Central package. Further details of the mediation system are provided in the OCS.

The ESR will apply an adaptive approach to ensure that corrective actions are applied in consultation with the appropriate construction staff to allow modifications and improvements in the management of any environmental issues resulting in community complaints.

In addition to the complaints reporting to the ER, in accordance with EPL condition R4.1, Daily Complaints Reports must be provided to the EPA by 2:00 pm each business day (or the next business day if it would otherwise be required to be submitted on a Saturday, Sunday or public holiday) that provide details of all complaints received in relation to activities regulated by the EPL. The Daily Complaints Report will be provided in a format approved in writing by the EPA. If the works that are the subject of a complaint have been carried out under EPL conditions L5.2, L5.3 or L5.4, the Daily Complaints Reports must also include details of how the requirements of these conditions have been met. For any reporting period during which no complaints have been received, no Daily Complaints Report is required to be submitted to the EPA.

## Complaints management process

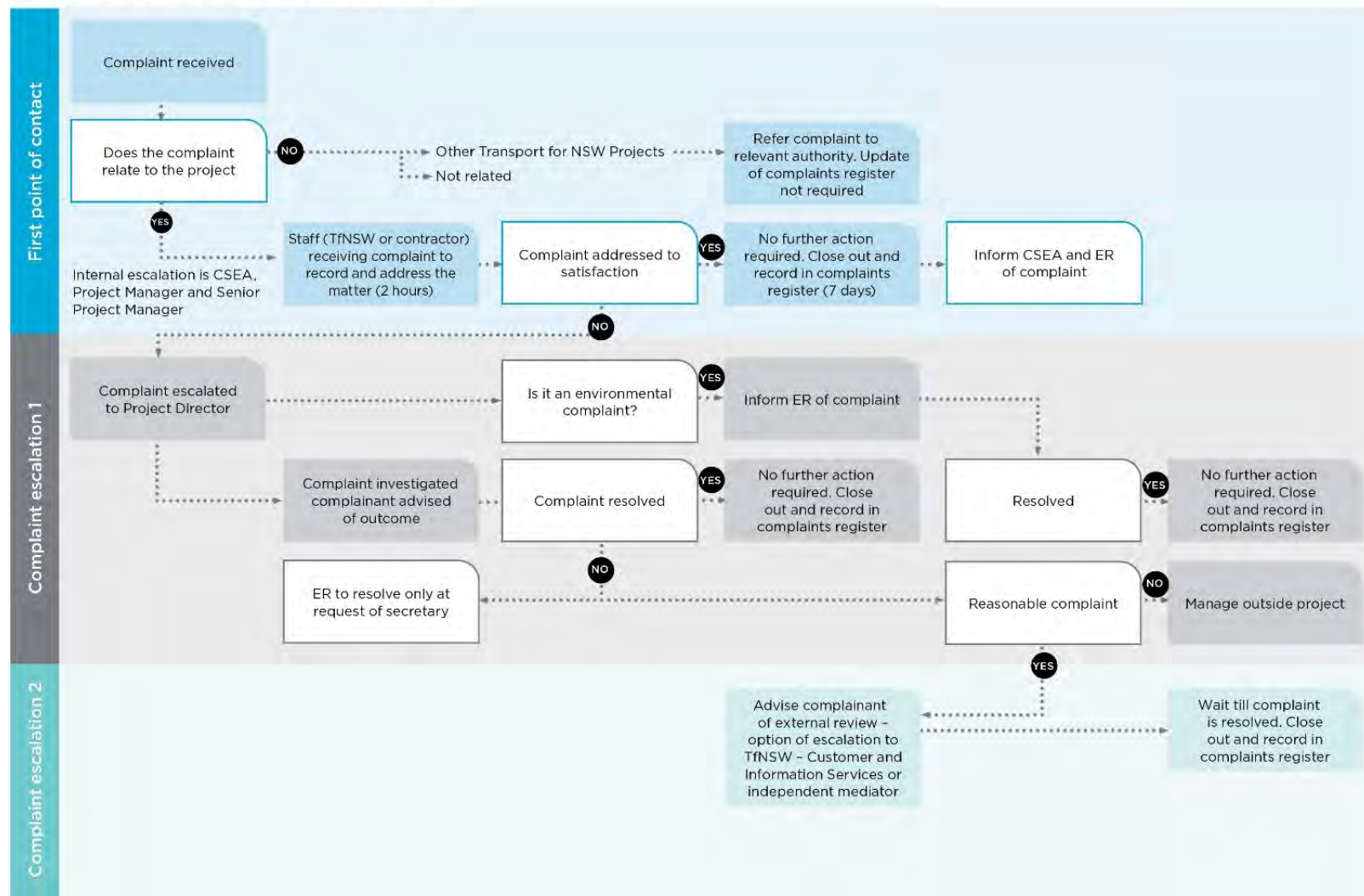


Figure 5-2: Complaints management process

#### 5.5.4 Project website

A website has been established for the Project (<https://www.rms.nsw.gov.au/projects/m12-motorway/index.html>) and will be regularly maintained during construction of the M12 Central package and wider Project. The website will be kept up to date with the latest Project information, environmental assessments, and will include all community updates. The Project website includes methods for the community to provide feedback, enquiries and complaints related to the Project and M12 Central package.

In accordance with NSW CoA B10, the following information will be maintained by TfNSW on the Project website:

- Information on the current implementation status of the Project
- The Environmental Assessment Documentation and any documentation relating to any modifications made to the Project
- A copy of the Infrastructure Approval in its original form, a current consolidated copy of the Approval (including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of the Approval
- A copy of each statutory approval, licence or permit required and obtained in relation to the Project
- A current copy of each document required under the terms of the Approval
- A copy of any audit reports required under NSW CoA A38 and A41.

Seymour Whyte will provide information to TfNSW as required to assist in the management of the Project website, including:

- A copy of this CEMP and Sub-plans
- Documentation required to be published under the Infrastructure Approval
- Community notifications, including for out of hours works
- Modifications to the Infrastructure Approval and consistency assessments
- Details of the telephone complaints line
- Other documents requested by TfNSW.

Seymour Whyte will supply documents to TfNSW required by the relevant CoA to be made publicly available, meeting TfNSW and DPE requirements including web-accessibility requirements.

Where the information/document relates to a particular work activity or is required to be implemented, it must be published before the commencement of the relevant work activity to which it relates or before its implementation.

Additionally, in accordance with NSW CoA B6, the Collection Statement must be included on the Project Website to make prospective complainants aware of their rights under *the Privacy and Personal Information Protection Act 1998*.

Relevant Project information will be published on the website for the duration of construction. As required by Commonwealth CoA 16(b), CEMP Sub-Plans (the overarching plans approved by the Secretary) will be published on the Project website within 20 business days of the date of their approval date, unless otherwise agreed to in writing by the Federal Minister for the Environment.

Confidential information, which may include the location of threatened species, Aboriginal objects or places and personnel contact details, will be removed from all documents provided before being made available to the public.

Seymour Whyte are required to publish certain information on its project website, including a copy of the EPL and any documents which are required to be made public under the EPL, including:

- A copy of the EPL No.21596
- Premise maps
- Community agreements
- EPL monthly reports.

#### **5.5.5 Design of temporary project elements**

In accordance with REMM LVIA07, project elements such as ancillary facility hoardings will be designed and maintained to minimise impacts on landscape character and visual amenity. This will include selecting colours and materials that are visually recessive and blend into the surrounding landscape where practicable, and the prompt removal of graffiti.

### **5.6 Property**

In accordance with REMM SLP01, areas of land leased for the purposes of construction will be reinstated at the end of the lease to at least equivalent standard in consultation with the landowner.

## 6 Emergency and incident planning, management and reporting

The M12 Environmental Incident Classification and Reporting Procedure (see Appendix A7) outlines the procedure to be followed if, during an activity being carried out there is:

- A report-only event
- A non-compliance
- Regulatory action received
- An environmental incident.

The Procedure sets out the steps for the:

- Identification
- Classification
- Reporting of report-only events, non-compliances, regulatory action and environmental incidents.

The M12 Environmental Incident Classification and Reporting Procedure (Appendix A7) has been modified to be made site-specific and includes requirements under the NSW CoA and the Commonwealth CoA for the Project. The following sections summarise the requirements.

### 6.1 Emergency preparedness

Emergency planning and awareness training will be undertaken for construction and based upon the M12 Environmental Incident Classification and Reporting Procedure in Appendix A7. All site personnel will be inducted on the incident management process detailed in Appendix A7.

Seymour Whyte will ensure that the following equipment will be available to all site personnel to utilise in the event of an incident:

- Protective gloves for certain types of corrosive chemicals
- Other personal protective equipment required for the handling of hazardous chemicals and radioactive substances
- Spill kits
- Stormwater drain guards
- Alarms for when there are issues with processes
- Firefighting equipment
- Up-to-date safety data sheets for any chemicals or fuels used or stored at the premises
- Hard hats for designated 'emergency controllers'
- Eye-wash stations.

Further details of the location of this equipment is provided in the Pollution Incident Response Management Plan (PIRMP) (Appendix A9). Seymour Whyte will ensure that all site personnel are aware of where the equipment listed above is located on site and appropriately trained on the use of all equipment.

A Spill Response and Management Procedure is provided in Appendix B4, Construction Soil and Water Management Sub-plan (Appendix G) to minimise impacts from spills. This Procedure details the requirements for managing, cleaning up and reporting of spills.

## 6.2 Incident identification

Section 3 of the M12 Environmental Incident Classification and Reporting Procedure provides the actions to be undertaken for incident response.

## 6.3 Incident classification

Section 3.1.1 of the M12 Environmental Incident Classification and Reporting Procedure details environmental incident classification based upon three risk areas (see Appendix A7):

- Environment
- Reputation and integrity
- Regulation and compliance.

Table 6-1 provides the definitions of each type of environmental incident/issue.

Table 6-1: Incident definitions

No.	Requirement
Environmental event	<ul style="list-style-type: none"> <li>• A report-only event, non-compliance, regulatory action or environmental incident.</li> </ul>
Environmental incident	<ul style="list-style-type: none"> <li>• An environmental incident is an event or set of circumstances, as a consequence of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur</li> <li>• Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items and adverse community impacts</li> <li>• An unexpected find that is not managed in accordance with relevant procedures / guidelines is also considered an environmental incident.</li> </ul>
Non-compliance (as per the M12 Environmental Incident Classification and Reporting Procedure)	<ul style="list-style-type: none"> <li>• A failure to comply with any CoA, REMM, licence condition (where applicable), permit or any other statutory approval relevant to the activity and/or area where the activity occurs.</li> </ul>
Notifiable event	<ul style="list-style-type: none"> <li>• Any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify a regulatory authority i.e. under NSW CoA A44 – A48 and Federal CoA 11 and 12.</li> </ul>
Report-only event	<ul style="list-style-type: none"> <li>• An environmental incident or unexpected find resulting from circumstances outside the scope of controls and of an activity.</li> </ul>



No.	Requirement
Significant incident	<ul style="list-style-type: none"> <li>An environmental incident that is likely to receive a classification of C3, C2 or C1, OR the history of the project, past performance and/or previous regulatory interest, indicate the project is likely to receive a penalty notice or be subject to prosecution, and therefore requires escalation to the Secretary and other TfNSW senior management.</li> </ul>
Incident affecting protected matter(s)	<ul style="list-style-type: none"> <li>An event that has the potential to, or does impact, Matters of National Environmental Significance other than as authorised by the M12 Federal approval.</li> </ul>

## 6.4 Incident notification

Reporting of environmental incidents will be in accordance with Section 3.2 of the M12 Environmental Incident Classification and Reporting Procedure, specifically Figure 2-1 and utilising the Environmental Event Reporting Form (624/400). A summary of notification requirements is provided in Table 6-2.

Potential class C1, C2 or C3 incidents will be notified verbally immediately to the ER and the TfNSW ESM (or delegate). Incident reports will be provided to TfNSW Project Manager and the ER in accordance with the TfNSW procedure, including lessons learnt from each environmental incident and proposed measures to prevent the occurrence of a similar incident. All efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident.

Incidents that meet the criteria outlined in the NSW CoA and Commonwealth CoA will also be notified verbally immediately to the ER and TfNSW ESM. Incident reports will be provided to TfNSW Project Manager and ER. TfNSW will provide written notification to DPHI and/or Commonwealth DCCEE in accordance with the procedure outlined in Appendix A7. In accordance with NSW CoA A44, the Planning Secretary must be notified in writing via the Major Projects website as soon as possible and no later than 12 hours after Seymour Whyte/TfNSW become aware of the incident.

NSW CoA A45 also requires additional written notification within seven days and a detailed report within 30 days of the incident occurring. Further information on incident reporting for the Planning Secretary can be found in Appendix A7. TfNSW and Seymour Whyte will undertake an investigation and implement corrective action to minimise the impact of the incident where possible.

### 6.4.1 Notifiable events

Section 3.3 of the M12 Environmental Incident Classification and Reporting Procedure outlines the requirements for the notification of any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify an authority.



Table 6-2: Summary of requirements for incident notification and reporting

Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
Regulatory action (material harm under the POEO Act)	EPA environment line Fire and Rescue NSW Ministry of Health SafeWork NSW Relevant Council TfNSW Project Manager and TfNSW ESM (or delegate)	Immediately	ESR	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR
	Secretary of DPHI and DCCEEW	As soon as possible, and no later than 12 hours after TfNSW becomes aware of an incident.	TfNSW (via the major projects portal)	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"><li>Written notification report</li><li>Detailed incident report</li></ul>	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"><li>Within 7 days</li><li>Within 30 days</li></ul>	ESR / TfNSW
Regulatory action (other than material harm under the POEO Act): <ul style="list-style-type: none"><li>Discovery of Aboriginal objects</li></ul>	TfNSW Project Manager and TfNSW ESM (or delegate) RAPs Environment and Heritage	As soon as possible, and no later than 12 hours after TfNSW becomes aware of an incident.	ESR / TfNSW	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW

Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
<ul style="list-style-type: none"> <li>Discovery of all human remains</li> </ul>	NSW Police	Immediately	ESR	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW
<ul style="list-style-type: none"> <li>If TfNSW activities have contaminated land or if TfNSW owns land that has been contaminated</li> </ul>	EPA	Immediately	ESR / TfNSW	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW
<ul style="list-style-type: none"> <li>The location of a relic once a relic has been discovered or located</li> </ul>	TfNSW Project Manager and TfNSW ESM (or delegate) Heritage NSW	Immediately	ESR / TfNSW	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW
<ul style="list-style-type: none"> <li>The inability to extinguish any fire burning during a bush fire danger period applicable to the land</li> </ul>	An appropriate officer of the NSW Rural Fire Service	Immediately	ESR / TfNSW	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW

Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
<ul style="list-style-type: none"> <li>Environmental incident with the potential for unapproved impacts on a drinking water supply</li> </ul>	Local water supply authority EPA	Immediately	ESR / TfNSW	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW
TfNSW Incident Classification C1, C2, C3 (excluding material harm)	TfNSW PM and TfNSW ESM (or delegate) ER	Immediately	ESR	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW
Significant Incident (C1, C2, C3) with potential for: <ul style="list-style-type: none"> <li>Regulatory action (e.g. EPA Penalty Infringement Notice) and/ or</li> <li>Reputational damage (e.g. media coverage) and/ or</li> <li>Significant environmental harm.</li> </ul>	TfNSW Executive Director Environment and Sustainability who will determine whether further escalation to the Secretary and other senior management is required	Immediately	TfNSW PM and TfNSW ESM (or delegate)	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW

Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
TfNSW Incident Classification C4, C5, and C6	TfNSW PM and TfNSW ESM (or delegate)	Immediately	ESR	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR
Report-only events	TfNSW PM and TfNSW ESM (or delegate)	Immediately	ESR	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR
Any incident (as defined in the NSW Infrastructure approval)	Secretary DPHI Minister for Commonwealth DCCEEW ER	As soon as possible and no later than 12 hours after TfNSW becomes aware of an incident.	TfNSW / ESR	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"> <li>Written notification report</li> <li>Detailed incident report</li> </ul>	In accordance with NSW CoA A44 and A45: <ul style="list-style-type: none"> <li>Within 7 days</li> <li>Within 30 days</li> </ul>	ESR / TfNSW
Incident affecting protected matters	TfNSW Project Manager and TfNSW ESM (or delegate) ER	Immediately	ESR	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR



Incident type	Notify	Notification timeframe	Notification responsibility	Written report	Written report timeframe	Written report responsibility
	Commonwealth DCCEEW	As soon as practicable, and no later than 2 business days after becoming aware of the incident	TfNSW	In accordance with Section 3.2 of the reporting procedure in Appendix A7	In accordance with Section 3.2 of the reporting procedure in Appendix A7	ESR / TfNSW

#### 6.4.2 Pollution Incident Response Management Plan (PIRMP)

Pollution incidents will also be managed in accordance with the M12 Central PIRMP (Appendix A9A) as required by the EPL. The PIRMP has been prepared and tested in accordance with *Environmental guidelines: Preparation of pollution incident response management plans (EPA, 2012)*.

The PIRMP documents the procedures to be followed in the event of an environmental emergency including:

- The names and contact details (including all-hours telephone numbers) for emergency response personnel
- Response personnel responsibilities
- Contact details for emergency services (ambulance, fire brigade, spill clean-up services)
- The location of on-site information on hazardous materials, including Safety Data Sheets and spill containment materials
- Steps to following to minimise damage and control and environmental emergency
- Instructions and contact details for notifying relevant government agencies, local councils and, if necessary, nearby residents
- Include measures to avoid spillages of fuels, chemicals, and fluids onto any surfaces or into any adjacent waterways.

All necessary contact numbers will be identified in advance and stored for immediate access should a pollution incident need to be notified. These contact numbers are also be identified in the M12 Central PIRMP in accordance with the EPL.

### 6.5 Incident investigation

Reporting of environmental incidents will be in accordance with the M12 Environmental Incident Classification and Reporting Procedure (see Appendix A7).

The responsibilities for incident reporting are provided in Section 5.1. The ESR is responsible for reporting on incidents.

Where required, due to the severity or ongoing nature of the incident, investigations will be conducted and action plans established to ensure that the incident does not occur again.

Environmental investigations will include:

- Identification of the cause, extent and responsibility of the incident
- Identification and implementation of the necessary corrective action
- Identification of the personnel responsible for carrying out the corrective action
- Implementation or modification of controls necessary to avoid a repeat occurrence of the incident
- Recording of any changes in written procedures required
- Notifying all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the POEO Act.

Where there are lessons learnt from the investigation or current procedures are identified as being ineffective, the CEMP will be revised by the ESR to include improved procedures or requirements.

In accordance with Commonwealth CoA 11 and 12, DCCEEW must also be notified in writing of any incident affecting protecting matters. The notification must be submitted as soon as practicable and no later than 2 business days after becoming aware of the incident affecting protected matters.

In accordance with Commonwealth CoA 12, DCCEEW must be provided with the details of the incident no later than 10 business days after becoming aware of the incident affecting protected matters.

## 7 Monitoring and review

### 7.1 Environmental inspections

Environmental inspections will be undertaken for the duration of the M12 Central package. The type and frequency of environmental inspections will be determined by the environmental risk assessment and reflect the minimum requirements detailed in Table 7-1.

Environmental inspections undertaken by Seymour Whyte environmental personnel will be documented on the online inspection form (Seymour Whyte intranet). Copies of all environmental inspection reports prepared by Seymour Whyte environmental personnel, TfNSW, the ER and/or ERG will be kept with the project records and closed out within the agreed timeframes.

Seymour Whyte will ensure that COVID-19 protocols are implemented on site during inspections to protect the wellbeing of inspection participants. Inspection participants to be informed of COVID-19 management measures during the pre-start briefing.

Table 7-1: Environmental inspections

Type of Inspection	Minimum Frequency	Form	Scope	By Whom
<b>Internal inspections</b>				
Informal – work sites	Pre-work / Daily	Daily diary	<ul style="list-style-type: none"> <li>• Site housekeeping</li> <li>• Erosion and sediment controls</li> <li>• Tree protection</li> <li>• Dust mitigation</li> <li>• Noise controls</li> <li>• Other environmental controls</li> <li>• Ensure resources required to perform works effectively are available and in place.</li> </ul>	Forman / Supervisor / Leading Hand
Informal – work sites	Daily	Environmental Checklist, as required	Significant environmental aspects and impacts including erosion and sediment controls	ESR / Environmental Coordinator
Formal – work sites	Weekly	Environmental Checklist	Significant environmental aspects and impacts including erosion and sediment controls	ESR / Environmental Coordinator

Type of Inspection	Minimum Frequency	Form	Scope	By Whom
Sustainability inspections	Weekly	Sustainability checklist	Environmental and social aspects	Sustainability Representative.
Soil conservationist inspections	Monthly, and as required	ERSED Report	As detailed in the Construction Soil and Water Management Plan	Soil conservationist
Wet weather preparation inspections	Prior to rainfall where a wet weather event is predicted. The wet weather event is a forecast of more than 50% chance of 10 mm or more of rain	Wet weather / flood preparedness checklist	Ensure that all erosion and sediment control measures installed on the premises are inspected and works undertaken to repair and/or maintain these controls if practicable and safe to do so. See Section 6 of the CFMP for flood preparedness scope.	ESR / Environmental Coordinator
Formal – work sites	Post rainfall (10 mm or more of rain within 24 hours recorded at the Seymour Whyte Automated Weather Station) / other significant weather event	Environmental Checklist	Significant environmental aspects and impacts including erosion and sediment controls	ESR / Environmental Coordinator
Formal – work sites	Pre-flood	Environmental Checklist	Ensure that all erosion and sediment control measures installed on the premises are inspected and works undertaken to repair and/or maintain these controls if practicable and safe to do so.	ESR / Environmental Coordinator
Formal – Shutdown inspections	Before and after site shutdowns (e.g. site closed for more than four days, such as during Christmas) or a significant weather event is forecast (e.g. storm event requiring shutdown of the site)	Environmental aspects of the M12 Central Shutdown Checklist	Significant environmental aspects and impacts including erosion and sediment controls	ESR / Environmental Coordinator

Type of Inspection	Minimum Frequency	Form	Scope	By Whom
Formal – Start up inspections	Following a shutdown period if a significant weather event has occurred during this time	Environmental Checklist	Significant environmental aspects and impacts including erosion and sediment controls	ESR / Environmental Coordinator
<b>External inspections</b>				
TfNSW Inspections	TfNSW to attend ER inspections and carry out other inspections based on an assessment of risk or to confirm action close out as appropriate.	Determined by TfNSW	Determined by TfNSW	TfNSW
ER Inspections	Typically on a weekly or fortnightly basis. Noting that frequency may vary based on an assessment of risk.	Determined by ER	Determined by ER	ER
EPA and other agency inspections	Determined by EPA.	Determined by EPA. See Section 7.1.4 for ESR reporting requirements	Determined by EPA	EPA
ERG Inspections	Typically on a monthly basis. Noting that frequency may vary based on an assessment of risk.	Determined by ERG	Determined by ERG	ERG

### 7.1.1 Action Tracking Register

All actions identified during environmental inspections will be tracked in an action tracking register and closed out within the required timeframes by the allocated personnel. The register will list the required action, date raised, status, and close out date. This register will be updated by the Environmental Coordinator (or delegate) and monitored by the ESR for on-time completion.

### 7.1.2 ER and TfNSW inspections

The ER and TfNSW Project Managers (or delegates) and TfNSW ESM (or delegate) will carry out regular inspections of work sites and critical activities throughout construction of the M12 Central package. Inspections by the ER and TfNSW will typically occur on a weekly or fortnightly basis depending on the complexity and anticipated risks associated with the stage of construction. Inspections will be carried out in accordance with the TfNSW inspection procedure.

The ESR and Project Engineer / Construction Manager / Foreman / Supervisor will participate in all ER and TfNSW inspections and will maintain appropriate records. Deficiencies and required



actions will be analysed and prioritised at the completion of the inspection and timeframes for implementation of corrective actions agreed in accordance with the TfNSW inspection procedure. Timeframes for the close out of issues will be discussed at the end of the inspection and nominated in the inspection form.

TfNSW may authorise environmental specialists as agents of TfNSW to enter the M12 Central package site for the purposes of surveillance or inspection and to attend site meetings to discuss environmental aspects of the M12 Central package.

### 7.1.3 ERG inspections

ERG inspections will typically occur on a monthly timeframe or as otherwise required depending on the construction staging. Section 7.3.5 describes the process if the ERG raises non-conformances or issues requiring corrective/preventative action during site inspections.

The ESR and Project Engineer / Construction Manager / Foreman / Supervisor will also participate in all ERG inspections to maintain appropriate records, identify required actions and timeframes for implementation of corrective actions. ERG inspection frequency may be reduced based on environmental performance and in agreement with all ERG members.

### 7.1.4 Inspections by EPA and other agencies

The ESR will prepare a report on each occasion that the site is visited by the EPA and/or other relevant agencies. The report will advise TfNSW of the purpose and outcome of the EPA and/or other relevant agencies visit, and of all actions taken by Seymour Whyte in response to the EPA visit and/ or other relevant agencies. The report will be provided to TfNSW within one working day of the visit.

## 7.2 Environmental monitoring

Monitoring will be undertaken to validate the impacts predicted for the M12 Central package, to measure the effectiveness of environmental controls and implementation of the OCEMP and CEMP and to address approval requirements. The monitoring requirements for required aspects are included in the relevant issue-specific environmental management plans and summarised in Table 7-2.

Table 7-2: Summary of CoA and REMMs environmental monitoring requirements

NSW CoA and REMM	Description	Relevant plan	Reporting requirements
CoA A16(e)	Program for monitoring the performance outcomes, including a program for noise monitoring consistent with the requirements of NSW CoA C14	Site Establishment Management Plan	See Section 2.5 and Appendix A4
CoA C11(a)	Noise and vibration monitoring	Construction Noise and Vibration Monitoring Program	See Appendix B of Appendix B2
CoA C11(b)	Surface water monitoring program	Construction Soil and Water Monitoring Program	See Appendix C of Appendix B4

NSW CoA and REMM	Description	Relevant plan	Reporting requirements
SWH05			
CoA C11(c)	Groundwater monitoring program	Construction Soil and Water Monitoring Program	See Appendix C of Appendix B4

The Construction Monitoring Programs required by NSW CoA C13 will provide:

- Details of baseline data available
- Details of baseline data to be obtained and when
- Details of all monitoring of the project to be undertaken
- The parameters of the project to be monitored
- The frequency of monitoring to be undertaken
- The location of monitoring
- The reporting of monitoring results
- Procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory
- Any consultation to be carried out in relation to the monitoring programs.

Construction Monitoring Programs are to be prepared under and consistent with the OCEMP and therefore do not require further consultation with relevant agencies (including DPE and relevant Councils) unless there are significant deviations from the monitoring programs included in the OCEMP which are not considered "minor" changes (and therefore able to be approved by the ER).

The Construction Monitoring Programs will be approved by the ER and submitted to the Secretary for information at least one month before commencement of construction. Construction will not commence until the Secretary has been provided the Construction Monitoring Programs, and all relevant baseline data for the specific construction activity has been collected.

Regular monitoring and measurement will be undertaken to monitor environmental management performance and evaluate compliance. The procedures set out in the Monitoring Programs must contain the scope, methodology and responsibilities for its implementation.

The Construction Monitoring Programs including any minor amendments approved by the ER, will be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Secretary, whichever is the greater.

The results of the monitoring will be reported within Construction Monitoring Reports to be issued to TfNSW every quarter from the commencement of construction. Construction Monitoring Reports must include the results of monitoring undertaken in accordance with the Construction Monitoring Programs including for noise and vibration, surface water quality and groundwater quality. Construction Monitoring Reports will be provided by TfNSW to the Planning Secretary and relevant government agencies for information.

Should a non-conformance be detected or monitoring results directly attributable to the M12 Central package exceed the target set in the monitoring programs, the following will be implemented:

- Analysis of the results by the ESR in more detail with a view of determining possible causes for the non-conformance
- Site inspection by the ESR (or delegate)
- Advising relevant personnel of the problem
- Identifying and agreeing on actions to resolve or mitigate the non-conformance
- Implementing actions to rectify or mitigate the non-conformance.

A non-conformance Environmental Incident Report and/or Environmental Improvement Notice may be issued by the TfNSW ESM (or delegate) or the TfNSW Project Manager in response to the non-conformance if it is found to be construction related. The timing for any improvement will be agreed between the relevant Project Manager/Construction Manager and TfNSW ESM (or delegate) based on the level of risk (e.g. a significant risk will require immediate action). The ER will be kept informed of any non-conformance, any Environmental Incident Report and/or any Environmental Improvement Notice issued, and the status of implementation or improvement actions.

The ER, TfNSW Project Manager and TfNSW ESM (or delegate) will be advised of any non-conformances from monitoring and details reported in the Monthly Environmental Reports and also in the Construction Monitoring Reports.

All environmental monitoring equipment will be maintained and calibrated according to manufacturers' specifications and appropriate records kept.

## **7.3 Compliance management and monitoring**

A non-compliance is the failure or refusal to comply with any CoA, REMM, licence condition (where applicable), permit or any other statutory approval relevant to the activity and/or area where the activity occurs.

### **7.3.1 Reporting a non-compliance under the State Infrastructure Approval**

In accordance with NSW CoA A46, the Planning Secretary must be notified in writing via the Major Projects website within seven days after TfNSW or Seymour Whyte becomes aware of any non-compliance.

As required by NSW CoA A47, a non-compliance notification must identify the Project (including Project work package) and the Infrastructure Approval application number for it, set out the condition of approval that is non-compliant, the way in which it does not comply, the reasons for the non-compliance (if known), and what actions have been, or will be, undertaken to address the non-compliance. The ER will also be informed of any non-compliance.

As specified in NSW CoA A48, a non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

### **7.3.2 Reporting a non-compliance under the Commonwealth Approval**

In accordance with Commonwealth CoA 11 and 12, DCCEEW must also be notified in writing of any non-compliance with the conditions or non-compliance with the commitments made in plans required in accordance with Commonwealth CoA 5a or 5b. The notification must be submitted as soon as practicable and no later than 2 business days after becoming aware of the non-

compliance, with a follow up report providing further details regarding corrective action within 10 business days

### **7.3.3 Reporting a non-compliance under TfNSWs Environmental Incident Procedure**

A non-compliance as defined in this management plan must be reported using the Environmental Event Reporting Form (624/400) and in accordance with Appendix A7.

### **7.3.4 Compliance records**

The ESR is responsible for maintaining compliance records as current at the point of use. The ESR (or delegate) will provide TfNSW with a copy of all compliance records to satisfy the requirements of the Commonwealth CoA and NSW CoA. TfNSW are required to maintain accurate and complete compliance records.

### **7.3.5 Non-conformances**

A non-conformance is the failure or refusal to comply with the requirements of project system documentation including this CEMP and supporting documentation that does not result in a non-compliance as defined in this management plan.

Non-conformances may be identified through the review of compliance (see Section 7.3), environmental auditing (see Section 7.3.7) or incident management (see Section 6.2).

Any member of the Seymour Whyte team may raise a non-conformance. The Quality Plan describes the process for managing non-conforming work practices and initiating corrective/preventative actions or system improvements. The ER, TfNSW Project Manager, TfNSW ESM (or delegate) or a representative of a public authority may also raise a non-conformance or improvement opportunity using the same process.

Non-conforming activities may be stopped, if necessary, by the ESR or Project/Site Engineers following consultation with the Construction Manager or delegate. The ER may also stop works in these circumstances, in which case a non-conformance report will be prepared by Seymour Whyte in accordance with the Quality Plan. The works will not recommence until corrective/ preventative actions have been closed out. This may also require the release of a Hold Point (Section 7.6.3) for any activity that causes or has the potential to cause harm to the environment due to a failure to meet the environmental obligations under the Contract (including recurring issues from checklists, reviews, improvements notices, inspections, audits and surveillance).

### **7.3.6 Corrective and preventative action**

When a non-conformance or non-compliance is identified, the following will be completed to rectify the non-conformance:

- Seymour Whyte will liaise with the appropriate site personnel or qualified person to identify the appropriate corrective/preventative actions and improvement opportunities
- Corrective/preventative actions and improvement opportunities will be entered into the Seymour Whyte quality management system database and include detail of the issue, action required and timing and responsibilities. The record will be updated with date of close out and any necessary notes

- Seymour Whyte will provide the corrective/preventative actions and improvement opportunities information to TfNSW in the monthly environmental reports
  - If a corrective action is required, a process will be completed for verification of how the non-conformance has been closed out and to confirm that it is effective in addressing the non-conformance
  - If a preventive action is required, relevant incidents, complaints, audit findings and non-conformances will be discussed with the ESR, TfNSW and the ER
- The Seymour Whyte quality management system database will be reviewed regularly to ensure actions are closed out as required.

Any environmental management improvement opportunities can be initiated as a result of incidents or emergencies, monitoring and measurement, review of compliance, audit findings or other reviews.

### **7.3.7 Compliance Monitoring and Reporting Program**

A Compliance Monitoring and Reporting Program will track and manage compliance against the CoAs, REMMs, permits and licenses. NSW CoAs that are not included in the CEMP and the aspect specific Sub-plans will be included in the Compliance Monitoring and Reporting Program (e.g. NSW CoA E63 and E73 relating to place, design and landscape aspects).

The Compliance Monitoring and Reporting Program will be prepared generally in accordance with the *Compliance Reporting Post Approval Requirements* (DPE 2020) and will be endorsed by the ESR prior to submission to TfNSW and the ER on a quarterly basis, or as requested.

Each quarterly Compliance Monitoring Report must provide details of any review of, and minor amendments made to, the CEMP (which must be endorsed by your ESR and approved by the ER), resulting from construction carried out during the reporting period.

Each Quarterly Compliance Monitoring Report will be made publicly available by TfNSW.

The Compliance Monitoring and Reporting Program must be implemented for the duration of construction and for a minimum of one year following Completion, or for a longer period as determined by TfNSW based on the outcomes of independent audits, ESR reports, ER reports and regular compliance reviews submitted through Compliance Monitoring and Reporting Program.

If DCCEEW makes a request in writing, TfNSW must provide electronic copies of compliance records to DCCEEW within the timeframe specified in the request.

In accordance with Commonwealth CoA 10, a compliance report will be prepared by TfNSW for each 12 month period following the commencement of construction. TfNSW will:

- Publish the report on the website within 60 business days following the relevant 12 month period
- Notify DCCEEW by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication
- Keep all compliance reports publicly available on the website

- Exclude or redact sensitive ecological data from published compliance reports
- Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to DCCEEW within 5 business days of publication.

## 7.4 Auditing

### 7.4.1 Independent audits – NSW Requirements

To satisfy NSW CoA A38, independent auditing and audit reporting for the Project will be carried out in accordance with the *Independent Audit, Post Approval Requirements (DPE, 2020)*. The auditing report will also be prepared in accordance with AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems.

The requirements for the Independent Audit as detailed in DPE (2020) *Independent Audit – Post Approval Requirements* are as follows<sup>1</sup>:

1. An assessment of compliance with:
  - a. All NSW and Commonwealth CoA applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation
  - b. All post approval and compliance documents prepared to satisfy the CoA, including an assessment of the implementation of Environmental Management Plans and Sub-plans
  - c. All environmental licences and approvals applicable to the development excluding environment protection licences issued under the *Protection of the Environment Operations Act 1997* or as agreed by the Planning Secretary.
2. A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - a. Actual impacts compared to predicted impacts documented in the Environmental Impact Assessment
  - b. The physical extent of the development in comparison with the approved boundary
  - c. Incidents, non-compliances and complaints that occurred or were made during the audit period
  - d. The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
  - e. Feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period
3. The status of implementation of previous Independent Audit findings, recommendations and actions (if any)

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<sup>1</sup> Note that during NSW CoA A38 independent auditing, both NSW and Commonwealth CoA will be audited.



4. A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate
5. Any other matters considered relevant by the auditor or DPHI, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

In accordance with NSW CoA A38, and the DPE 2020 *Independent Audit – Post Approval Requirements*, the independent environmental audits of the Project will be conducted by a suitably qualified, experienced and independent team of experts in auditing. The results of the audit will be documented in an Environmental Audit Report which:

- Assesses the environmental performance of the Project and its effects on the surrounding environment
- Assesses whether the Project is complying with the NSW and Commonwealth CoA and REMMs
- Reviews the adequacy of any document required under the Infrastructure Approval
- Verifies compliance with the OCEMP, this CEMP and issue-specific plans
- Verifies compliance with any relevant legal and other requirements (e.g. licenses, permits, regulations, TfNSW contract documentation including specifications)
- Recommends measures or actions to improve the environmental performance of the Project, and improvements to any document required under the Approval.

In accordance with NSW CoA A38, the Independent Auditor will be approved by the Planning Secretary no later than two weeks following commencement of the construction.

The first independent environmental audit will be carried out within 12 weeks of the commencement of construction, or as agreed by the Planning Secretary. Ongoing independent environmental audits will occur at intervals, no greater than 26 weeks from the date of the initial audit, or as agreed by the Planning Secretary. However, the Planning Secretary may request the independent audits to be completed at different times. If this occurs, the Planning Secretary will give one month's notice to TfNSW and Seymour Whyte of the date upon which the audit will be required.

Seymour Whyte will make suitable facilities available at the site to accommodate an Independent Audit team of three persons for three days each. Seymour Whyte will provide the required staff at the site available to assist TfNSW with the Independent Audits.

Under NSW CoA A41, the Planning Secretary may direct independent audits in addition to those provided for in NSW CoA A38 when considered necessary to address a particular issue.

TfNSW will submit a copy of the Environmental Audit Report to the Secretary with a response to any recommendations contained in the audit report for information within two months from the undertaking of the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (DPE, 2020), or within another timeframe agreed with the Secretary, in accordance with NSW CoA A43. The Environmental Audit Reports will also be provided to the Commonwealth Minister for the Environment if a non-compliance or incident relating to Protected Matters is identified.

### **7.4.2 Independent audits – Commonwealth Requirements**

Independent audits of compliance with the Commonwealth CoA will be conducted as requested by DCCEEW. In accordance with Commonwealth CoA 14, TfNSW will provide DCCEEW with the name and qualifications of the independent auditor and the draft audit criteria to the DCCEEW for approval. Prior to the commencement of the audit TfNSW will agree the audit criteria with DCCEEW in writing. TfNSW must issue the audit report to DCCEEW within the timeframe specified in the approved audit criteria. Seymour Whyte will provide all assistance reasonably requested by TfNSW to meet the timeframes agreed to in the Commonwealth CoA.

In accordance with Commonwealth CoA 15, Seymour Whyte will assist TfNSW in publishing the Audit Report on the Project website within 10 business days of receiving the Planning Secretary's approval of the audit report. TfNSW will keep the Audit Report published on the Project website until the end date of the Commonwealth approval, or as otherwise agreed by the Planning Secretary in writing.

Seymour Whyte will maintain accurate records substantiating all activities associated with or relevant to the Commonwealth CoA, including measures taken to implement all management plans required by the Commonwealth CoAs, and make them available upon request to DCCEEW. Such records may be subject to audit by DCCEEW or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the Commonwealth CoA.

### **7.4.3 Internal audits**

Internal auditing will be undertaken by a suitably qualified auditor approved by TfNSW, however cannot be personnel from either the Contractor or TfNSW's immediate M12 Environmental teams. Internal audits will be carried out at least twice every 12 months during construction and scheduled one month prior to the independent audits so that the outcomes of the internal audits can inform the independent audits. The internal audit scope will cover the most material environmental, social and economic issues for the project and determine compliance with:

- The OCEMP, this CEMPs and Sub-plans Approval requirements (CoAs, REMMS)
- Any relevant legal and other requirements (e.g. licenses, permits, regulations, TfNSW contract documentation, including specifications).

An audit checklist will be developed and amended as necessary to reflect changes to the OCEMP, CEMP, subsequent approvals and changes to Acts, regulations or guidelines.

All internal environmental audits will be undertaken in accordance with AS/NZS ISO 19011.

### **7.4.4 Audit of the ER's exercise of its functions**

The Planning Secretary may at any time commission an audit of an ER's exercise of its functions under NSW CoA A28. TfNSW, Seymour Whyte and ER will facilitate and assist the Planning Secretary in any such audit.

### **7.4.5 TfNSW audits**

If TfNSW surveillance / inspections or audits indicate that the environmental controls are not in place or are not properly maintained as required by this CEMP, TfNSW may conduct a CEMP compliance audit at 24 hours' notice to the ESR; otherwise TfNSW will give the ESR at least 5 days' notice that a CEMP compliance audit is to be conducted and will advise the ESR on the scope of this audit.

At least 10 working days prior to construction completion, TfNSW may also carry out an audit to verify that all environmental obligations listed in the TfNSW Specification G36 have been met.

Seymour Whyte will provide the necessary resources, including site personnel and facilities at the site to accommodate the audit team nominated by TfNSW. Seymour Whyte will address all environmental issues identified during TfNSW audits, and respond in writing within five (5) working days to the auditor, with a copy to TfNSW, in respect of any issues raised during these audits.

Table 7-3 summarises the auditing to be undertaken for the M12 Central package.

Table 7-3: M12 Central package – audit requirements

Audit	Requirement	Timing	Responsibility	Recipient
Independent audit (NSW CoA A38)	<p>As detailed in DPE (2020) <i>Independent Audit – Post Approval Requirements</i> and summarised above.</p> <p>The independent environmental audits of the Project will be conducted by a suitably qualified, experienced and independent team of experts in auditing and the audit will be documented in an Environmental Audit Report.</p>	<p>The first independent environmental audit will be carried out within 12 weeks of the commencement of construction.</p> <p>Ongoing independent environmental audits will occur at intervals, no greater than 26 weeks from the date of the initial audit or as agreed by the Planning Secretary.</p>	<p>TfNSW to procure suitably qualified, experienced and independent team of auditors</p> <p>Independent auditor to undertake audit and prepare audit report</p>	Planning Secretary Minister for DCCEE
Internal audit	Verify compliance with approval and legal requirements, TfNSW Specifications and construction documentation	Internal audits will occur one month prior to the independent audit (i.e. two every 12 months)	TfNSW Project Management Team	ESR / Project Director TfNSW ER
TfNSW audit (G36)	Compliance with CEMP, as detailed in TfNSW Specification G36, Section 5.1	As required if inspections indicate that environmental controls are not in place or are not properly maintained as required by this CEMP.	TfNSW	ESR / Project Director TfNSW ER
TfNSW audit (G36)	Verify that all environmental obligations listed TfNSW Specification G36 have been met	At least 10 working days prior to construction completion.	TfNSW	ESR / Project Director TfNSW ER
ER (NSW CoA A28)	Audit of the ER's exercise of its functions	As required by the Planning Secretary	TfNSW and the ER to facilitate and assist with the audit	Planning Secretary

## 7.5 Reporting and identified records

Various reports will be prepared to address the requirements of the Infrastructure Approval, commitments under the Environmental Assessment Documentation, TfNSW Specifications and other reporting needs. Table 7-4 sets out the overarching reporting requirements for the M12 Central package. Further reporting requirements will be outlined in the CEMP Sub-plans, including reports, plans, strategies and procedures that will be prepared. Section 7.6.2 outlines the approach to be adopted for document control on the M12 Central package.

Seymour Whyte will maintain accurate records substantiating all activities associated with the M12 Central package or relevant to the conditions of approval, including measures taken to implement all management plans. Records will be made available to DPHI , DCCEEW and Commonwealth DCCEEW upon request, within the timeframe nominated in the request.

Table 7-4: Project reporting requirements

Report	Requirement	Timing	Responsibility	Recipient
<b>Reporting to TfNSW under the Contract</b>				
Monthly Environmental Report	For incorporation in Project Monthly Reports including environmental statistics (i.e. incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance, compliance report and key environmental issues.	Monthly	Construction Contractor ESR	TfNSW ER (for information)
<b>Reporting to EPA under the EPL</b>				
EPL Monthly Report	Details of all non-compliances with conditions of EPL, measures taken to prevent recurrence	Within 10 working days of the end of each calendar month.	ESR	EPA
EPL Annual Returns	Report on compliance with EPL including: <ul style="list-style-type: none"> <li>• Statement of Compliance</li> <li>• Monitoring and Complaints Summary</li> <li>• Statement of Compliance for: <ul style="list-style-type: none"> <li>- Licence conditions</li> <li>- Load based fee</li> <li>- Requirement to prepare PIRMP</li> <li>- Publish pollution monitoring data</li> <li>- Environmental Management Systems and practices</li> </ul> </li> </ul>	Within 60 days of the anniversary of the EPL	ESR	EPA

Report	Requirement	Timing	Responsibility	Recipient
<b>Inspection Reports (not related to CoA)</b>				
EPA or any other agency inspection report (other than for arranged inspections)	The report will detail the purpose, outcome and actions pertaining to the visit and will be submitted to the TfNSW Project Manager.	Within one working day of the EPA or any other Authority visit, other than for arranged inspections	ESR	TfNSW EPA
TfNSW Environmental Inspection Reports	Response to matters raised in TfNSW site inspections (see Section 7.1.2)	Typically, every two weeks but also as required.	ESR	TfNSW
ERG Environmental Inspection Reports	Response to matters raised in ERG site inspections (to Section 7.1.3)	Typically, monthly but also as required.	ESR	TfNSW ERG
<b>Reporting under the NSW Infrastructure Approval</b>				
<b>Part A - Administrative</b>				
Staging Report (NSW CoA A10)	Details the work and activities to be carried and their timing for each Project stage	One month before the proposed change in the staging	TfNSW	ER Planning Secretary (for information)
Site Establishment Management Plan (NSW CoA A16)	See Section 3.3.7 and Appendix A4	Prior the installation of any ancillary facilities	ESR	Planning Secretary (for approval)
ER Monthly Reports (NSW CoA A34(j))	Report of site environmental performance following routine inspections Refer to Section 5.1.1	Monthly, and submitted within seven days following the end of each month for the duration of the ER's engagement	ER	Planning Secretary Other regulatory agencies TfNSW
Notification of Staged Construction Commencement (NSW CoA A37)	If construction is staged, notification in writing of the commencement date of each stage	At least one month before the commencement of construction on the M12 Central package	TfNSW	Planning Secretary



Report	Requirement	Timing	Responsibility	Recipient
Independent Environment Audit Report (NSW CoA A38)	Refer to Section 7.4.1	Annually, starting within 12 months of commencement of construction  Occur at intervals, no greater than 26 weeks from the date of the initial audit	Suitably qualified, experienced, independent team of auditors	Planning Secretary (for information)  Minister for DCCEEW
Notification of incident (NSW CoA A44)	Refer to Section 6	As early as possible and within 24 hours of the incident	TfNSW ESR	DPE ER (for information)
Notification of incident affecting protected matters	In accordance with Section 3.2 of the reporting procedure in Appendix A7	As soon as practicable, and no later than 2 business days after becoming aware of the incident	TfNSW ESR	DPE DCCEEW ER (for information)
<b>Part B - Communication Information and Reporting</b>				
Overarching Communication Strategy (NSW CoA B1)	Refer to Section 5.5.3	One month prior to commencement of construction	TfNSW Community and Stakeholder Engagement Advisor	Planning Secretary (for Approval)
Complaints Management System (NSW CoA B6)	Refer to Section 5.5	One month prior to commencement of construction	TfNSW Community and Stakeholder Engagement Advisor	Planning Secretary (for information)

Report	Requirement	Timing	Responsibility	Recipient
Complaints Register (NSW CoA B10)	Refer to Section 5.5	On request during construction (Planning Secretary) On the day complaints are received (TfNSW and ER)	ESR	Planning Secretary (for information) TfNSW ER
<b>Part C – Construction Environment Management</b>				
CEMP (NSW CoA C1)	Refer to Sections 1.2 and 1.4	OCEMP - One month prior to commencement of construction of Project	TfNSW	ER (for endorsement) Planning Secretary (for approval)
		CEMP (this document) - One month prior to commencement of construction of stage	ESR	TfNSW ER (for endorsement) Planning Secretary (for information)
CEMP Sub-plans (NSW CoA C4)	Refer to Section 3.3.1	OCEMP Sub-plans - One month prior to commencement of construction of Project	TfNSW	ER (for endorsement) Planning Secretary (for approval)
		CEMP Sub-plans - One month prior to commencement of construction of stage	ESR	TfNSW ER (for endorsement) Planning Secretary (for information)
Construction Monitoring Report (NSW CoA C18)	Refer to Section 7 Refer to Appendix B2, Appendix B4, Appendix B7	OCEMP Monitoring Programs - Quarterly until operation is fully commenced	TfNSW	ER (for endorsement) Planning Secretary (for approval)

Report	Requirement	Timing	Responsibility	Recipient
		CEMP Monitoring Programs – Quarterly until operation is fully commenced	ESR	TfNSW
<b>Part E – Key Issues</b>				
<b>Heritage</b>				
Heritage Interpretation Plan (NSW CoA E27)	Identifies heritage items to be used in the final design of the Project Refer to Appendix B6 Refer PDLP	No later than the commencement of operation  Submitted to the Planning Secretary and Heritage NSW prior to finalising the PDLP required by NSW CoA E69	TfNSW	Planning Secretary and Heritage NSW (for information)
Heritage Report (NSW CoA E30)	Details of any cultural heritage investigations either undertaken or to be carried out including analysis of artefacts from excavations and identification of a final repository for finds carried out for the Project. Refer to Appendix B6	Within 12 months after the completion of all work	TfNSW	Planning Secretary (for information)
Unexpected Heritage Finds Procedure (NSW CoA E31)	Refer to Appendix B6	One month prior to commencement of construction	TfNSW	Planning Secretary (for information)
<b>Property and Land Use</b>				

Report	Requirement	Timing	Responsibility	Recipient
Pre-construction Condition Survey Report (NSW CoA E76)	Pre-construction surveys for owners of surface and sub-surface structures and other relevant assets identified at risk from vibration, including all listed heritage items and buildings/structures of heritage significance as identified in the documents listed in NSW CoA A1	Prior to the commencement of any works	Seymour Whyte Property Manager	Property owner Local council(s)
Soils and Contamination				
Detailed Site Investigation Report (s) (NSW CoA E85)	Documents outcomes of contamination assessments of land on which the Project is located Refer to Appendix B5	Prior to the commencement of any work that would result in the disturbance of potential or contaminated land and/or soil	Suitably qualified and experienced person under the CLM Act	Planning Secretary (for information)
Remedial Action Plan (NSW CoA E87)	Documents approach to remediation of specified contaminated land Refer to Appendix B5	Prior to commencing with remediation	Suitably qualified and experienced person under the CLM Act and approved by	Planning Secretary (for information)
Section A Site Audit Statement and Site Audit Report (NSW CoA E88)	Verifies land is suitable for intended land use Refer to Appendix B5	After remediation and no later than one month before the commencement of operation	EPA Accredited Site Auditor	Planning Secretary Relevant local Council(s)
Unexpected Contaminated Land and Asbestos Finds Procedure (NSW CoA E89)	Refer to Appendix B5	Implement during construction	Overarching – TfNSW	Planning Secretary
			Stage Specific – ESR	TfNSW
Sustainability				

Report	Requirement	Timing	Responsibility	Recipient
Sustainability Strategy (NSW CoA E91)	Refer to the Sustainability Strategy	Prior to the commencement of construction	Overarching – TfNSW	Planning Secretary (for information)
			Stage Specific – Sustainability Manager	TfNSW
Transport and Traffic				
Road Dilapidation Report (NSW CoA E95)	Road dilapidation report for local roads proposed to be used by construction vehicles	Within three weeks of completing the surveys and at least two weeks before the road is used by heavy vehicles	Prepared by a suitably qualified person	Relevant local Council(s)
Place and Design				
Place, Design and Landscape Plan (NSW CoA E69)	Inform the final design of the Project	No later than one month prior to the commencement of permanent works that are the PDLP	TfNSW	Planning Secretary (for approval)
Seymour Whyte reporting to TfNSW under the Contract				
Compliance Monitoring and Reporting Program	Manage compliance against CoA, REMMs, permits and licenses for which Seymour Whyte are responsible	Quarterly	ESR	TfNSW (for approval) Planning Secretary and ER (for information)
Monthly Environmental Report	For incorporation in Project Monthly Reports including environmental statistics (i.e. incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance, compliance report and key environmental issues.	Monthly	ESR	TfNSW ER (for information)

Report	Requirement	Timing	Responsibility	Recipient
Construction Compliance Report	Provide TfNSW with Construction Compliance Reports for inclusion in TfNSW's Construction Compliance Report for submission to the DPE and bring to TfNSW's attention any reported shortcomings	Six months after the start of construction and thereafter at six-monthly intervals or at other such periods as directed by TfNSW. No sooner than six weeks prior to completion.	ESR	TfNSW ER (for information)
Pre-Construction Compliance Report AND Pre-Operational Compliance Report	Prepare a draft Pre-Construction / Pre-Operation Compliance Report and a final reports addressing TfNSW comments. The Pre-Construction / Pre-Operational Compliance Report must include: (a) Details of how the project commitments required to be addressed before construction were complied with (b) The time when each relevant commitment was complied with, including dates of submission of any required reports and/or approval dates (c) Details of any approvals or licences required to be issued by relevant Government Departments before construction commences.	Pre-Construction Compliance Report - Submit at least 10 working days prior to the commencement of construction for release of the Hold Point (Section 7.6.3). Pre-Operational Compliance Report – three months prior to completion.	ESR	TfNSW ER (for information)

## 7.6 Records of environmental activities

### 7.6.1 Environmental records

The ESR is responsible for maintaining the Seymour Whyte's environmental management documents and records as current at the point of use. Types of documents and records include:

- Monitoring, inspection and compliance reports/records
- Correspondence with public authorities
- Internal and external audit reports
- Induction and training records
- Reports on environmental incidents, other environmental non-conformances, complaints and follow-up action
- Community engagement information
- Minutes of CEMP and Environmental Management System review meetings and evidence of any action taken
- CEMP and Sub-plans EWMS.

Seymour Whyte's environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements.

Only the ESR or delegate has the authority to change the Seymour Whyte environmental management documentation. The ESR must endorse changes prior to resubmission. This documentation will be held for five years after the actual completion date and be available to TfNSW and EPA upon request.

The TfNSW ESM (or delegate) is responsible for amending the OCEMP and Sub-plans and maintaining TfNSW's environmental records.

### 7.6.2 Document control

The ESR will coordinate the preparation, review and distribution of Seymour Whyte's environmental documents and records. The TfNSW ESM (or delegate) and TfNSW Project Managers will coordinate the preparation, review and distribution of the OCEMP and Sub-plans.

Table 7-4 identifies the recipients for the M12 Central package documentation, including CEMP and Sub-plans.

During construction, Seymour Whyte's environmental documents and records will be stored at the main site compound. The documents required to be prepared under the Infrastructure Approval will be made available on the Project website (refer to Section 5.5.4).

Seymour Whyte will implement a document control procedure to be provided in the Quality Management Plan to control the flow of documents within and between TfNSW, stakeholders and sub-contractors. The procedure will ensure that documentation is:

- Developed, reviewed and approved prior to issue
- Issued for use



- Controlled and stored for the legally required timeframe
- Removed from use when superseded or obsolete
- Archived.

A register and distribution list will identify the current revision of documents, records or data. The Document Register is maintained in Appendix A5.

### 7.6.3 Hold Points and Witness Points

The ESR is responsible for maintaining a register of Hold Points and Witness Points which must be met by the CEMP and Sub-plans. Hold Points and Witness Points relevant to this Plan are outlined in Table 7-5.

Table 7-5: Hold Points and Witness Points applicable to this Plan

TfNSW spec	Clause	Type	Description	Plan reference
G36	3.1	Hold Point	Commencement of work not previously addressed by CEMS and CEMP documents and authorised by earlier Hold Point release. <i>This does not apply to Low Impact Work.</i>  At least 10 working days prior to the proposed commencement of the stage of WUC nominated in a submission and only following completion of the TfNSW/ER review process, submit the CEMP and associated Plans, Sub-Plans, Monitoring Programs and/or EWMS, as well as the CEMS documents listed in Clause 3.1 for the release of the Hold Point. The Principal may request additional information for inclusion in the CEMP before authorising the release of the Hold Point.	Section 1.12
G36	3.2.2	Hold Point	At least 5 working days prior to the activity, provide to TfNSW evidence of the receipt of the approval, licence and/or permit from the relevant authority.	Section 4.2.2
G36	3.2.4	Hold Point	At least 20 working days prior to the commencement of work activities not previously addressed by an endorsed EWMS, Seymour Whyte must provide an EWMS addressing the issues listed Clause 3.2.4 of G36 for the nominated work activities.	Section 3.3.3
G36	3.2.5	Hold Point	At least 10 working days prior to the commencement of Low Impact Work activities, Seymour Whyte must provide a Low Impact Work Method Statement addressing the issues listed Clause 3.2.5 of G36 for the nominated Low Impact Work activities.	Section 3.3.8
G36	3.5.2	Hold Point	At least 10 working days before it is planned to be used, drafts of all environmental induction and/or online materials must be provided to TfNSW for endorsement.	Section 5.3.1

TfNSW spec	Clause	Type	Description	Plan reference
G36	3.10	Hold Point	For any activity stopped by TfNSW that causes or has the potential to cause harm to the environment due to a failure to meet the environmental obligations under the Contract (including recurring issues from checklists, reviews, improvements notices, inspections, audits and surveillance) will require verification that the failure has been rectified and detailed of the measures implemented to prevent reoccurrence.	Section 7.3.5
G36	3.11	Hold Point	The final Pre-Construction Compliance Report must be provided to TfNSW at least 10 working days before commencement of construction.	Section 7.5
G1	13	Hold Point	Pre-Construction Survey Report(s) must be completed and provided to TfNSW before commencement of construction.	Section 7.5

Hold Points and Witness Points relevant to particular environmental aspects are covered in the relevant Plan. A list of the Hold Points and Witness Points for the M12 Central package is also provided in Appendix A1.

## 7.7 Environmental Management System review

Periodic reviews of the Environmental Management System will be undertaken as part of the continual improvement process for the M12 Central package through meetings of relevant personnel. Table 7-6 sets out the purpose, frequency and attendees for the Environmental Management System review meetings.

The outcomes of the management, environmental group and senior management reviews could include amendments to the OCEMP, this CEMP, Sub-plans and related documentation, revision to the Project or M12 Central Environmental Management Systems, review of the risk assessment, re-evaluation of the M12 Central package objectives and targets as well as input into other Project documents. For further details on the OCEMP and CEMP revision process, refer to Section 1.12.

Table 7-6: M12 Central Environmental Management System reviews

Meeting	Purpose	Frequency	Attendees
Management review	<ul style="list-style-type: none"> <li>• Identification of areas of opportunity for improved environmental performance</li> <li>• Analysis of the causes of nonconformities and deficiencies, including those identified in environment inspections and audits</li> <li>• Verification of the effectiveness of corrective and preventative actions</li> <li>• Highlight any changes in procedures resulting from process improvement</li> <li>• A review of the aspects and impacts register, legal register and environmental induction</li> </ul>	Quarterly	At minimum: <ul style="list-style-type: none"> <li>• TfNSW Project Managers and ESM (or delegate)</li> <li>• Project Director, Construction Manager, Project Managers and ESR</li> </ul>
Environment Review Group	<ul style="list-style-type: none"> <li>• A review of the aspects and impacts register, legal register and environmental induction</li> <li>• Consideration of monitoring, inspection and audit results</li> <li>• Consideration of incidents and any lessons learnt</li> <li>• Consideration of any new regulatory issues</li> <li>• A review of the effectiveness of erosion and sediment controls</li> <li>• Consideration of ERG issues</li> <li>• Consideration of changes in operational needs such as resourcing</li> <li>• Feedback from management reviews</li> </ul>	Quarterly	<ul style="list-style-type: none"> <li>• TfNSW ESM (or delegate)</li> <li>• ESR</li> <li>• Project Managers</li> <li>• Relevant Seymour Whyte personnel</li> </ul>

Meeting	Purpose	Frequency	Attendees
Senior management review	<ul style="list-style-type: none"> <li>• Review of OCEMP and CEMP</li> <li>• Effectiveness of environmental management documentation implementation</li> <li>• Management effectiveness</li> <li>• Potential improvements to the environmental management documentation</li> <li>• Adequacy of resources</li> <li>• Findings of audits</li> <li>• Environmental objectives and targets</li> <li>• Environmental performance</li> <li>• Compliance with legal and other requirements</li> <li>• Critical non-conformance or repeated non-conformances</li> <li>• Organisation changes</li> <li>• Effectiveness of training and inductions</li> </ul>	Annually	<ul style="list-style-type: none"> <li>• TfNSW Project Director and ESM (or delegate)</li> <li>• Project Director, Construction Manager, Project Managers and ESR</li> </ul>

### 7.7.1 Project refinements

Modifications or refinements to the M12 Central package may result from detailed design refinement or changed circumstances during construction, resulting in the need of a Modification or Consistency Assessment. TfNSW (or Seymour Whyte as applicable) is responsible for formally seeking approval from the Planning Secretary for any M12 Central package modification and for documenting refinements that are consistent with the Approved Project. Approval of a Modification or Consistency Assessment will result in the update of the OCEMP and CEMP as relevant.

The TfNSW ESM (or Seymour Whyte as applicable) is responsible for the assessment of M12 Central package refinements and management of the consistency assessment process. The ESR is responsible for incorporating any new environmental impacts and/or new statutory approval requirements into the appropriate environmental management documentation. This includes OCEMP updates, as outlined in Section 1.12.

Any design changes or changes in scope of works will be communicated to the ESR. The ESR will undertake an environmental assessment and consistency review for the proposed changes in consultation with the TfNSW ESM (or delegate) to determine if a Modification may be required.

Should a consistency review determine that a Modification may be required (i.e. the impacts are of a nature and scale that it is not considered consistent with the Project approval), the ER will be informed immediately and a modification application under Section 5.25 of the EP&A Act will be prepared and submitted to the Planning Secretary for determination.

The TfNSW Project Director and TfNSW ESM (or delegate) will approve all refinements that are deemed consistent with the Infrastructure Approval. A copy of any Consistency Assessment will be provided to the ER before the commencement of the subject work for information.

# Appendix A1

## Legal and Other Requirements

M12 Motorway - Central

January 2025

## Legal requirements

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<b>General</b>					
<i>Environmental Planning and Assessment Act 1979</i>	All	The Project is subject to an approval under Division 5.2 of the Environmental Planning and Assessment Act 1979 (EP&A Act) as Critical State Significant Infrastructure (CSSI) (SSI-9364). Comply with the terms Minister for Planning's approval for the project. Obtain the Minister's approval for any project modifications that are not consistent with the planning approval.	S5.14 S5.25	Yes	CEMP refer to Section 1.2 and 1.3
<b>Water</b>					
<i>Water Management Act 2000</i> With the exception of controlled activity approvals, the <i>Water Management Act 2000</i> (WM Act) only applies in relation to those water sources covered by operational water sharing plans – these areas cover most of the State's major regulated river systems.	Water access and use	Do not take water from a water source (a lake, river or estuary or place where water occurs naturally on or below the surface of the ground, and includes coastal waters) without an access licence.  Do not use of water on land (unless supplied by a water utility, irrigation corporation etc or in accordance with basic landholder rights) without a water use approval.	S56 S60A S89 S91A	No	CSWMP refer to Section 7.5.1



Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Water Management Act 2000</i>	Water management works	Do not construct/use a water supply work, drainage work or flood work without the appropriate approval.	S90 S91B S91C S91D	No	CSWMP refer to Section 7.5.1
<i>Water Management Act 2000</i>	Waterfront land	Do not deposit material, excavate, or remove material within a watercourse bank, shore or bed, or on land 40 metres inland, or interfere with the likely flow of water to such a body, without a controlled activity approval.	S91	No  Public authorities are exempt from the need to obtain a controlled activity approval.  Water Management (General) Regulation 2011 (cl.38)	CSWMP refer to Section 7.5.1
<i>Water Management Act 2000</i>	Water access and use	An aquifer interference approval/licence may be required under Section 91(3) if construction requires intersection of a groundwater source	S91	Yes	CEMP refer to Section 4.2.2

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Water Management (General) Regulation 2018</i>	Water access and use	Exemptions for the requirement of a water access license for roads authority in relation to water required for road construction and road maintenance as listed in Clause 2 of Schedule 4.  Exemptions for the requirement of a water access license for any public authority lawfully engaged in the use of water for dust suppression—in relation to water required for that purpose as listed in Clause 5 of Schedule 4	S21(1)  Schedule 4 (2)  Schedule 4 (5)	Yes	CSWMP refer to Section 7.5.1
<i>Water Act 1912</i>  Note that this Act is being progressively repealed by the WM Act.  With the exception of controlled activity approvals, the WM Act only applies in relation to those water sources covered by operational water sharing plans – these areas cover most of the State's major regulated river systems.	Surface water	Obtain a licence or permit for construction or use of 'work' for purposes including the taking and using of water	S21B	Yes	CEMP refer to Section 4.2.2  CSWMP refer to Section 7.5.1
	Groundwater	Obtain a licence where interference with groundwater is likely to occur.	S112 S121A	S112 does not apply to the Crown. TfNSW is therefore not required to obtain a licence under this provision.	CSWMP refer to Section 7.5.1

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
	Floodplains	Obtain an approval for controlled works. These include works which occur on a designated floodplain, which can prevent land from being flooded or which can affect water flow to or from a river or lake.	91D	An exemption in relation to roads potentially applies – see clause 41E of the <i>Water Management (Regulation) 2011</i> .	CFMP refer to Appendix B
<i>Protection of the Environment Operations Act 1997</i>	Water pollution	Do not cause water pollution (other than to a sewer), except in accordance with the conditions of an Environment Protection Licence.	S120 S122	Yes	CSWMP refer to Section 3.5 CCLMP refer to Appendix B
<b>Noise</b>					
<i>Protection of the Environment Operations Act 1997</i>	Plant maintenance and operation	Do not operate plant if it emits noise caused by poor maintenance or operation.	S139	Yes	CNVMP refer to Section 8
<i>Protection of the Environment Operations Act 1997</i>	Materials management	Do not cause noise by failing to properly and efficiently deal with materials.	S140	Yes	CNVMP refer to Section 8
<b>Contaminated material</b>					

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Protection of the Environment Operations Act 1997</i>	Land pollution	Do not cause or permit land pollution other than under authority of a licence or regulation. (However it is not a land pollution offence to place virgin excavated natural material or lawful pesticides and fertilisers on land, or by placing matter on land that has been notified to the EPA as an unlicensed landfill and which is operated in accordance with the regulations.)	S142A – S142E	Yes	CCLMP refer to Section 6.5
<i>Contaminated Land Management Act 1997</i>	Reporting contamination	Notify the EPA if;  Contaminants exceed thresholds contained in guidelines or the regulations where contamination has entered or will foreseeably enter neighbouring land, the atmosphere, groundwater or surface water.  Contaminants in soil are equal to or exceed guideline levels with respect to the current or approved use of the land.  Contamination meets other criteria that may be prescribed by the regulations.	S60	Yes	CCLMP refer to Section 6.5  CSWMP refer to Section 7.6.1 and Appendix E
<b>Biodiversity</b>					
<i>Biodiversity Conservation Act 2016</i>	Fauna	Do not harm any animal that is; of a threatened species, that is part of a threatened ecological community or is a protected animal, unless authorised under other legislation (e.g. planning approval).	S2.1 S2.8	Yes	CFFMP refer to Section 6.12

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Biodiversity Conservation Act 2016</i>	Habitat	Do not damage habitat of a threatened species or ecological community unless authorised under other legislation (e.g. planning approval).	S2.4 S2.8	Yes	CFFMP refer to Section 6.12
<i>Biodiversity Conservation Act 2016</i>	Biodiversity	Do not damage declared areas of outstanding biodiversity value unless authorised under other legislation (e.g. planning approval).	S2.3 S2.8	Yes	CFFMP refer to Section 6.12
<i>Biodiversity Conservation Act 2016</i>	Flora	Do not pick a plant that is; of a threatened species, that is part of a threatened ecological community or is a protected plant, unless authorised under other legislation (e.g. planning approval).	S2.2 S2.8	Yes	CFFMP refer to Section 6.12
Biodiversity Conservation (Savings and transitional) Regulation 2017	Flora and fauna conservation	The regulation is in place to assist with repealing and replacing of the previous biodiversity legislation, including the <i>Threatened Species Conservation Act 1995</i> , and the <i>Native Vegetation Act 2003</i> . The biodiversity assessment for the Project was carried out under the <i>Framework for Biodiversity Assessment</i> which was the standard method for assessing impacts of major projects on biodiversity and determining offsetting requirements.		Yes	CFFMP refer to Section 6.12
<i>Biosecurity Act 2015</i>	Weeds	Manage weeds on site in accordance with the relevant Regional Strategic Weed Management Plan.	S22	Yes	CFFMP refer to Section 6.12 and Appendix E

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
Biosecurity Regulation 2017	Pests and Diseases	Notify the presence any pest or disease listed in Schedule 1 of the <i>Biosecurity Regulation 2014</i> , within one working day after suspecting or becoming aware of the pest or disease.	Regulation cl.7 Schedule 1	Yes	CFFMP refer to Section 6.12 and Appendix E
<i>Fisheries Management Act 1994</i>	Dredging or reclamation	Provide the Minister for Primary Industries 28 days-notice of planned dredging or reclamation work.  Temporary creek crossings would be required to build bridges at Cosgroves Creek, Badgerys Creek, South Creek and Kemps Creek.  Bridge piers would be permanently placed within Badgerys Creek, South Creek, Kemps Creek to allow for the construction of the bridges. This may require dredging or reclamation work.	S199	Yes	CFFMP refer to Section 6.12
<i>Fisheries Management Act 1994</i>	Fish passage	Do not block fish passage without a permit	S219	No	CFFMP refer to Section 6.12
<i>Environment Protection Biodiversity Conservation Act, 1999 (Commonwealth)</i>	Flora and fauna conservation	Do not kill, injure or take a member of a listed threatened species without a permit.	Part 13	Yes	CFFMP refer to Section 6.12
		Comply with the terms of any EPBC Act approval for the project.		NA	CFFMP refer to Section 3.3
<b>Waste</b>					



Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Protection of the Environment Operations Act 1997</i>	Littering	Do not litter in a public place or an open private place. Do not litter from a vehicle.  Only deposit advertising material in receptacles provided for mail or newspapers or under the door of the premises.  Do not deposit advertising material on or in vehicles.	Part 5.6A	Yes	CWRMP refer to Section 5.9



Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Protection of the Environment Operations Act 1997</i>	Waste and transportation	<p>Do not undertake a scheduled waste activity unless in accordance with an EPL.</p> <p>A licence must be obtained when construction and demolition wastes are applied to land under certain circumstances. This includes the reincorporation of crushed road base material back into roads and the placing of excess fill material onto properties. A licence is not required if the material:</p> <ul style="list-style-type: none"> <li>• Is VENM.</li> <li>• Does not exceed 200 tonnes in the Sydney, Newcastle and Wollongong areas, or 20,000 tonnes outside these areas.</li> <li>• Is covered by a “general exemption”. Current exempted materials are ENM, recycled aggregates and raw mulch. These exemptions are conditional and require some chemical testing of materials before they are placed onto land.</li> <li>• A licence must be obtained if more than 2,500 tonnes (or cubic metres) is stored on a stockpile site at any one time, or more than 30,000 tonnes of waste is received per year from off site.</li> </ul>	Part 3.2 Schedule 1	Yes	<p>CWRMP refer to Section 5.1</p> <p>CSWMP refer to Section 7.6.1</p>

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
		Only transport waste to a facility that can lawfully accept the waste.	S143	Yes	CWRMP refer to Section 5.7.4 and Section 7
		Do not dispose of waste in a manner that harms or is likely to harm the environment.	S115	Yes	CWRMP refer to Section 5.7.4 and Section 7
Protection of the Environment Operations (Waste) Regulation 2005	Waste and transportation	Comply with general requirements for the transport of waste. For example, any vehicle used by the person to transport waste must be kept in a clean condition and be maintained so as to prevent spillage of waste. For some wastes only licensed transporters can be used.	Regulation cl.49	Yes	CWRMP refer to Section 5.7.3 and Section 7
		Comply with record keeping requirements in relation to the transport of certain types of waste.	Regulation Part 3	Yes	CWRMP refer to Section 5.7.4 and Appendix C
Protection of the Environment Operations (Waste) Regulation 2014 (POEO Regulation)		Any excavations on former landfill sites must be approved	Regulation 110a	Yes	CWRMP refer to Section 5.1 and Section 5.9
<b>Heritage</b>					
<i>Heritage Act 1977</i>	Heritage	Do not undertake an activity that will affect a place, building, work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.	S56-57	No	CCHMP refer to Section 6.5

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
		Do not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or Do not disturb or excavate land on where a relic has been discovered or exposed.	S139	No	CCHMP refer to Section 6.5
		Notify the heritage Council on discovery of a relic	S146	Yes	CCHMP refer to Section 6.3 and Appendix D
<i>National Parks and Wildlife Act 1974</i>	Aboriginal places and objects	Do not harm or desecrate an Aboriginal object or Aboriginal place without consent.	S86 S90	No	CCHMP refer to Section 6.3 and Appendix D
		Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	S89A	Yes	CCHMP refer to Section 6.3 and Appendix D
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth)</i>	Protection of areas and objects	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	S20	Yes	CCHMP refer to Section 6.3 and Appendix D
		Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.	S22	Yes	CCHMP refer to Section 6.3 and Appendix D

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<b>General</b>					
<i>Protection of the Environment Operations Act 1997</i>	Harming the environment	Do not risk harming the environment by wilfully or negligently: <ul style="list-style-type: none"> <li>• Disposing of waste unlawfully.</li> <li>• Causing any substance to leak, spill or otherwise escape (whether or not from a container); or</li> <li>• Emitting an ozone depleting substance.</li> </ul>	S115 S116 S117	Yes	CCLMP refer to Section 6.5  CWRMP refer to Section 5.9 and 7  CAQMP refer to Section 7
<i>Protection of the Environment Operations Act 1997</i>	Control equipment	Properly and efficiently maintain and operate any installed pollution control equipment (including monitoring devices).	S167	Yes	CCLMP refer to Section 6.5
<i>Protection of the Environment Operations Act 1997</i>	Notification of pollution incidents	Notify the EPA immediately of pollution incidents where material harm to the environment is caused or threatened.	S148	Yes	CCLMP refer to Section 6.5  Appendix A7 of the OCEMP

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Protection of the Environment Operations Act 1997</i>	Site licensing	<p>Do not carry out or allow an activity listed in Schedule 1, or carry out work to enable such an activity, unless the premises are licensed by the EPA. This applies to:</p> <ul style="list-style-type: none"> <li>Road construction: meaning the construction, widening or re-routing of roads if it results in the existence of four or more traffic lanes (other than bicycle lanes or lanes used for entry or exit) for one kilometres of their length in the metropolitan area, or five kilometres in length in any other area, where the road is classified, or proposed to be classified, as a freeway or tollway under the <i>Roads Act 1993</i>.</li> </ul>	S47 S48	Yes	<p>CEMP refer to Section 4.2.2</p> <p>CTTMP refer to Section 6.1.1</p>
<i>Environmentally Hazardous Chemicals Act 1985</i>	Hazards and risks	Obtain a licence to undertake prescribed activities involving environmentally hazardous chemicals or declared chemical wastes.	S28	Yes	<p>CEMP refer to Section 4.2.2</p> <p>CCLMP refer to Section 7.1.1 and Appendix B</p>
<i>Dangerous Goods (Road and Rail Transport) Act 2008</i>	Hazards and risks	Ensure that dangerous goods are transported in a safe manner.	S9	Yes	CCLMP refer to Section 6.5

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Rural Fires Act 1997</i>	Bushfire risk	The Act provides for the prevention, mitigation and suppression of bush and other fires in local government area.  Exemptions can be sought to allow hot works to be undertaken on Total Fire Ban days	Division 6 S99	Yes	OCEMP refer to Section 4.2.2
<i>National Greenhouse and Energy Reporting Act, 2007 and Regulations 2008</i>	Greenhouse gas emissions	Accounting and reporting of greenhouse gases produced and energy consumed during construction. Applicability dependent on thresholds.	-	Yes	CAQMP refer to Section 7 and Appendix C
<i>Land Acquisition (Just Terms and Compensation) Act 1991 (Land Acquisition Act)</i>	Property acquisition	Applies to the acquisition of any land required for the project.	-	Yes	Individual agreements with landowners

Act	Activity / aspect	Requirement	Reference	Division 5.2 applicability	Relevant section or supporting documentation
<i>Pesticides Act 1999</i>	Hazards and risks	<p>Use pesticides in an environmentally sensitive manner.</p> <p>Do not use an unregistered pesticide without a permit.</p> <p>Read the label or permit for the pesticide.</p> <p>Use registered pesticides in accordance with instructions on the label.</p> <p>Do not use any restricted pesticide unless authorised by a certificate of competency or a pesticide control order under the Act.</p> <ul style="list-style-type: none"> <li>Compliance with pesticide codes of practice is required.</li> </ul>	<p>S12</p> <p>S13</p> <p>S14</p> <p>S15</p> <p>S17</p>	Yes	CFFMP refer to Section 6.12 and Appendix E



## Secondary CoA and REMMs

The primary NSW CoA specifically relevant to the development of this Plan are listed in Section 1.4 of the CEMP. Secondary conditions that are related to the development of the CEMP (and Sub-plans were relevant) have been listed in the table. A cross reference is also included to indicate where the CoA is addressed in this Plan or other Project management documents. This table is a review mechanism by TfNSW to ensure the relevant CoA and REMMs are being addressed appropriately in the CEMP (and Sub-plans were relevant).

## NSW CoA

CoA	Condition Requirements	CEMP Reference
A1	The Proponent must carry out the CSSI in accordance with the terms of approval and generally in accordance with:	Section 1.1
	a) M12 Motorway Environmental Impact Statement (dated October 2019);	
	b) M12 Motorway Submissions Report (dated October 2020);	
	c) M12 Motorway Amendment Report (dated October 2020);	
	d) M12 Motorway Amendment Report - Submissions Report (dated December 2020); and	
	e) M12 Motorway Amendment Report - Submissions Report - Amendment (dated 8 March 2021).	
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance outcomes and mitigation measures set out in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	Section 1.2
A3	In the event of an inconsistency between:	N/A
	a) The terms of this approval and any document listed in Condition A1, the terms of this approval will prevail to the extent of the inconsistency; and	

CoA	Condition Requirements	CEMP Reference
	b) Any document listed in Condition A1, the most recent document will prevail to the extent of the inconsistency.	
A4	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to:	Section 4.2.2
	(a) the environmental performance of the CSSI;	
	(b) any document or correspondence in relation to the CSSI (including the provision of such documentation or correspondence);	Section 4.2.2
	(c) any notification given to the Planning Secretary under the terms of this approval;	Section 4.2.2
	(d) any independent appointment or withdrawal of an appointment made in relation to the CSSI;	Section 4.2.2
	(e) any audit of the construction or operation of the CSSI;	Section 4.2.2
	(f) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval);	Section 4.2.2
	(g) the carrying out of any additional monitoring or mitigation measures; and	Section 4.2.2
	(h) in respect of ongoing monitoring and management obligations, and following consultation with the Proponent, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.	Section 4.2.2
A5	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken and submitted to the Planning Secretary, and the terms of this approval require the document, monitoring program or review to be prepared/undertaken in consultation with identified parties, evidence of the consultation must be submitted to the Planning Secretary with the relevant document, monitoring program or review. The evidence must include:	OCEMP Section 1.10 Section 5.5.2 OCS

CoA	Condition Requirements	CEMP Reference
	a) Documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval	
	b) A log of the dates of engagement or attempted engagement with the identified party	
	c) Documentation of the follow-up with the identified party where engagement has not occurred to confirm that they do not wish to engage or have not attempted to engage after repeated invitations	
	d) Outline of the issues raised by the identified party and how they have been addressed	
	e) A description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.	
A6	This approval lapses five (5) years after the date on which it is granted, unless Work has physically commenced on or before that date.	OCEMP
A7	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.	Section 4.2
A8	Any document that must be submitted or action taken within a timeframe specified in or under the terms of this approval may be submitted or undertaken within a later timeframe agreed with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident under <b>Condition A44</b> and <b>Condition A45</b> .	Section 3.3
A9	The CSSI may be constructed and operated in stages. Where staged construction or operation is proposed, a <b>Staging Report</b> (for either or both construction and operation as the case may be) must be prepared and submitted to the Planning Secretary for information. The <b>Staging Report</b> must be endorsed by the <b>ER</b> and then submitted to the Planning Secretary no later than one (1) month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one (1) month before the commencement of operation of the first of the proposed stages of operation).	Section 2.2 Staging Report

CoA	Condition Requirements	CEMP Reference
A10	<p>The <b>Staging Report</b> must:</p> <ul style="list-style-type: none"> <li>(a) if staged construction is proposed, set out how the construction of the whole of the CSSI will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;</li> <li>(b) if staged operation is proposed, set out how the operation of the whole of the CSSI will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);</li> <li>(c) specify how compliance with conditions will be achieved across and between each of the stages of the CSSI; and</li> <li>(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.</li> </ul>	Staging Report
A11	The CSSI must be staged in accordance with the <b>Staging Report</b> .	Section 1.2.3 Staging Report
A12	Where staging is proposed, the terms of this approval that apply or are relevant to the work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	Section 2.2 Staging Report
A13	Where changes are proposed to the staging of construction or operation, a revised <b>Staging Report</b> must be prepared and submitted to the Planning Secretary for information no later than one (1) month before the proposed change in the staging. The revised <b>Staging Report</b> must be endorsed by the <b>ER</b> before submitting it to the Planning Secretary.	Section 2.2 Staging Report
A14	<p>With the approval of the Secretary, the Proponent may submit any strategies plans or programs required by this approval on a progressive basis.</p> <p><i>Notes:</i></p> <ol style="list-style-type: none"> <li>1. <i>While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the Work being undertaken on site is covered by suitable strategies, plans or programs at all times; and</i></li> <li>2. <i>If the submission of any strategy, plan or program is to be submitted on a progressive basis, then the relevant strategy, plan or program must clearly describe the specific Work or stage to which the strategy, plan or program applies, the relationship of the Work or stage to any future Work or stages, and the trigger for updating the strategy, plan or program if and as relevant.</i></li> </ol>	Section 3.3.2 Staging Report

CoA	Condition Requirements	CEMP Reference
A15	Construction ancillary facilities (excluding minor construction ancillary facilities established under Condition A20) that are not identified by description and location in the documents referred to in Condition A1 can only be established and used in each case if:	Section 2.5 Appendix A4 (Section 2.2)
	a) They are located within or immediately adjacent to the construction boundary; and	
	b) They are not located next to a sensitive receiver(s) (including where an access road is between the facility and the receiver(s)), unless the sensitive receiver(s) (both the landowner(s) and occupier(s)2) have given written acceptance to the carrying out of the relevant facility in the proposed location; and	
	c) They have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and	
	d) The establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.	
A16	Before the establishment of a major construction ancillary facility (i.e. excluding minor construction ancillary facility(s) established under Condition A20), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facility(s). The Site Establishment Management Plan must be prepared in consultation with the relevant council(s) and government agencies. The Plan must be endorsed by the ER and then submitted to the Planning Secretary for approval one (1) month before the establishment of the construction ancillary facility(ies). The Site Establishment Management Plan must detail the management of the construction ancillary facility(ies) and include:	Section 2.5 Appendix A4 (Section 2.3)
	a) A description of activities to be undertaken during establishment of the construction ancillary facility(ies) (including scheduling and duration of works to be undertaken at the site)	
	b) Figures illustrating the proposed site layout and the closest sensitive receiver(s);	

CoA	Condition Requirements	CEMP Reference
	c) A program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of site establishment work;	
	d) Details of how the site establishment activities described in subsection (a) of this condition will be carried out to:	
	i. meet the performance outcomes stated in the documents listed in Condition A1, and	
	ii. manage the risks identified in the risk analysis undertaken in subsection of this condition; and	
	e) A program for monitoring the performance outcomes, including a program for construction noise monitoring consistent with the requirements of Condition C14.	
	The Site Establishment Management Plan must be approved before the establishment of a construction ancillary facility(ies) (excluding minor construction ancillary facilities established under Condition A20). Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each construction ancillary facility. Note: Condition A16 does not apply to minor construction ancillary facilities established under Condition A20.	
A17	Where a construction ancillary facility(ies) has been established for any early works listed in Appendix B and is to be used for construction, a new or revised Site Establishment Management Plan must be prepared where additional activities are required to establish the site for the purposes of construction or there is a change to the site layout. The new or revised Site Establishment Management Plan must be prepared in accordance with Condition A16 and approved by the Planning Secretary before commencement of the additional activities or change to site layout.	Appendix A4 (Section 2.3)

CoA	Condition Requirements	CEMP Reference
A18	<p>The use of a construction ancillary facility for construction (excluding minor construction ancillary facilities established under Condition A20 and construction ancillary facilities established for the purposes of early works in accordance with Condition A24) must not commence until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C4 and relevant Construction Monitoring Programs required by Condition C11 have been approved by the Planning Secretary.</p> <p>This condition does not apply to the use of construction ancillary facilities where the ER has determined that the use of the facility will have a minimal impact on the environment and community.</p>	Appendix A4
A19	<p>Construction ancillary facilities established for the purposes of early works in accordance with Condition A24 cannot be used for construction until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C4 and relevant Construction Monitoring Programs required by Condition C11 have been approved by the Planning Secretary.</p> <p>This condition does not apply to the use of construction ancillary facilities where the ER has determined that the use of the facility will have a minimal impact on the environment and community.</p>	Appendix A4
A20	<p>Lunch sheds, office sheds, portable toilet facilities, and the like, can be established and operated where they satisfy the following criteria:</p> <ul style="list-style-type: none"> <li>a) Are located within or adjacent to the construction boundary</li> <li>b) Have been assessed by the ER to have: <ul style="list-style-type: none"> <li>i. Minor amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and</li> <li>ii. Minor environmental impact with respect to waste management, soil, water and flooding, and</li> <li>iii. No impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval.</li> </ul> </li> </ul>	Section 2.5 Appendix A4 (Section 3)
A21	Boundary screening must be erected around all construction ancillary facilities that are adjacent to sensitive receivers for the duration of construction of the CSSI unless otherwise agreed with affected residents, business operators and landowners.	Appendix A4 (Section 2.3.4)





CoA	Condition Requirements	CEMP Reference
A22	Boundary screening required under Condition A21 of this approval must minimise, as far as practicable, visual impacts on adjacent sensitive receivers.	Appendix A4 (Section 2.3.4)
A23	The CSSI name; application number; telephone number, postal address and email address required under Condition B7 of this approval must be made available on site boundary fencing / hoarding at the entrance of each ancillary facility before the commencement of construction.	Appendix A4
A30	Work must not commence until an Environmental Representative (ER) has been approved by the Planning Secretary and engaged by the Proponent.	Section 5.1.1

CoA	Condition Requirements	CEMP Reference
A34	<p>For the duration of Work until the commencement of operation, or as agreed with the Planning Secretary, the approved <b>ER</b> must:</p> <ul style="list-style-type: none"> <li>(a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI;</li> <li>(b) consider and inform the Planning Secretary on matters specified in the terms of this approval;</li> <li>(c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community;</li> <li>(d) review the documents identified in <b>Conditions A9, A13, A16, A24, C1, C4 and C11</b> and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: <ul style="list-style-type: none"> <li>(i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or</li> <li>(ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary / Department);</li> </ul> </li> <li>(e) regularly monitor the implementation of the documents listed in <b>Conditions A9, A13, A16, A24, C1, C4 and C11</b> to ensure implementation is being carried out in accordance with the documents and the terms of this approval;</li> <li>(f) as may be requested by the Planning Secretary, help plan, attend or undertake audits of the CSSI commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under <b>Conditions A38 and A41</b> of this approval;</li> <li>(g) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints;</li> <li>(h) assess the impacts of minor construction ancillary facilities, as required by <b>Condition A20</b> of this approval;</li> <li>(i) consider any minor amendments to be made to the <b>CEMP, CEMP Sub-plans, Construction Monitoring Programs, Site Establishment Management Plans and Early Works Environmental Management Plan</b> that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and the documents approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval;</li> <li>(j) prepare and submit to the Planning Secretary and relevant regulatory agencies (where requested by those agencies), for information, an <b>Environmental Representative Monthly Report</b> providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports." <b>The Environmental Representative Monthly Report</b> must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI.</li> </ul>	<p>Section 1.11</p> <p>Section 1.12</p> <p>Section 5.1.1</p> <p>Section 5.1.3</p> <p>Section 7.5</p>

CoA	Condition Requirements	CEMP Reference
A35	<p>The Proponent must provide the <b>ER</b> with all documentation requested by the <b>ER</b> in order for the <b>ER</b> to perform their functions specified in <b>Condition A34</b> (including preparation of the <b>ER</b> monthly report), as well as:</p> <ul style="list-style-type: none"> <li>(a) the complaints register for any complaints received (on the day they are received); and</li> <li>(b) a copy of any assessment carried out by the Proponent of whether proposed Work is consistent with the approval (which must be provided to the <b>ER</b> before the commencement of the subject Work).</li> </ul>	<p>Section 5.1.3</p> <p>Section 5.5.3</p> <p>Section 7.5</p> <p>Section 7.7.1</p>
A36	The Department must be notified in writing of the dates of commencement of early works, construction and operation at least one (1) month before those dates.	Section 5.5.2
A37	If the construction or operation of the CSSI is to be staged, the Department must be notified in writing at least one (1) month before the commencement of each stage, of the date of the commencement of that stage.	Section 5.5.2
A38	<p>The Proponent must engage an independent auditor and conduct auditing and audit reporting of the CSSI in accordance with the document Independent Audit Post Approval Requirements (DPIE, 2020).</p> <p>Note: The independent auditor must be approved by the Planning Secretary no later than two weeks following the commencement of construction as required by Independent Audit Post Approval Requirements (DPIE, 2020).</p>	<p>Section 7.4.1</p> <p>Section 7.4.2</p>
A40	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to that set out in Independent Audit, Post Approval Requirements (DPIE, 2020), upon giving at least one (1) month's notice to the Proponent of the date upon which the audit must be commenced	Section 7.4.1
A41	The Planning Secretary may direct the Proponent to undertake Independent Audits in addition to those provided for in Condition A38 when considered necessary to address a particular issue.	<p>Section 7.4.1</p> <p>Section 7.4.2</p>
A42	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements</i> , the Proponent must:	Section 7.4.1
	a) Review and respond to each Independent Audit Report prepared under Condition A38 or Condition A41;	
	b) Submit the response to the Planning Secretary; and	

CoA	Condition Requirements	CEMP Reference
	c) Make each Independent Audit Report and response to it publicly available 60 days after submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	
A43	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary for information within two (2) months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (DPIE, 2020).	Section 7.4.1
A44	The Planning Secretary must be notified in writing via the Major Projects Website as soon as possible and no later than 12 hours after the Proponent becomes aware of an incident. The notification must identify the CSSI (including the application number and the name of the CSSI) and the date, time, location and nature of the incident.	Section 6.4 Appendix A7
A45	Subsequent notification must be given and reports submitted to the Planning Secretary in accordance with the requirements set out in Appendix A.	Section 6.4 Appendix A7
A46	The Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after the Proponent becomes aware of any non-compliance.	Section 6.4 Section 7.3 Appendix A7
A47	A non-compliance notification must identify the CSSI and the application number for it, set out the condition of approval that the CSSI is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Section 7.3 Appendix A7
A48	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Section 7.3.1 Section 7.3.1 Appendix A7

CoA	Condition Requirements	CEMP Reference
A49	All heavy vehicles used for construction spoil haulage must be clearly marked on the sides and rear with the CSSI name (or where the CSSI is staged, the name of that stage) to enable immediate identification by a person viewing the heavy vehicle. Details of the CSSI identification markings must be submitted to the Planning Secretary for approval and approved prior to the heavy vehicles being used for construction spoil haulage. There must only be one CSSI form of signage on a heavy vehicle at any one time.	CTTMP
B1	A Communication Strategy must be prepared to provide mechanisms to facilitate communication about Work, construction and operation of the CSSI with:	Section 5.5.3 OCS
	a) The community (including adjoining affected landowners and businesses, and others directly impacted by the CSSI); and	
	b) The relevant councils and relevant government agencies.	
	The Communication Strategy must address who (the Proponent, Independent Appointments and/or construction contractor) will engage with the community, relevant councils and agencies, how they will engage and the timing of engagements.	
B6	A Complaints Management System must be prepared and implemented before the commencement of any Work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI. The Complaints Management System must require complainants to be advised that:	Section 5.5.3 OCS
	a) The Complaints Register may be forwarded to Government agencies, including the Department, to allow them to undertake their regulatory duties;	
	b) By providing personal information, the complainant authorises the Proponent to provide that information to government agencies;	
	c) The supply of personal information by the complainant is voluntary; and	
	d) The complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement).	
	The Collection Statement must be included on the Proponent's or project website to make prospective complainants aware of their rights under the Privacy and Personal Information Protection Act 1998. For any complaints made in person, the complainant must be made aware of the Collection Statement.	

CoA	Condition Requirements	CEMP Reference
B7	The following information must be available to facilitate community enquiries and manage complaints one (1) month before the commencement of Work and for 12 months following the completion of construction:	Section 5.5.3 Section 5.5.4
	a) 24-hour telephone number for the registration of complaints and enquiries about the CSSI	
	b) A postal address to which written complaints and enquires may be sent	
	c) An email address to which electronic complaints and enquiries may be transmitted; and	
	d) A mediation system for complaints unable to be resolved.	
	This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level and must be provided on the website required under Condition B10.	
B8	A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the:	Section 5.5.3
	a) Number of complaints received;	
	b) The date and time of the complaint;	
	c) The method by which the complaint was made;	
	d) Any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;	
	e) Nature of the complaint;	
	f) Means by which the complaint was addressed and whether resolution was reached, with or without mediation; and	
	g) If no action was taken, the reason(s) why no action was taken.	
B9	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	Section 5.5.3 OCS

CoA	Condition Requirements	CEMP Reference
B10	A website or webpage providing information in relation to the CSSI must be established before commencement of Work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction. The following up-to-date information (excluding confidential, private, commercial information or any other information that the Planning Secretary has approved to be excluded) must be published before the relevant Work commencing and maintained on the website or dedicated pages including:	Section 5.5.3 Section 5.5.4
	a) Information on the current implementation status of the CSSI;	
	b) A copy of the documents listed in Condition A1 of this approval, and any documentation relating to any modifications made to the CSSI or the terms of this approval;	
	c) A copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval (ordered in a logical sequence and easy to navigate);	
	d) A copy of each statutory approval, licence or permit required and obtained in relation to the CSSI;	
	e) A current copy of the final version of each document required under the terms of this approval; and	
	f) A copy of the audit reports required under Conditions A38 and A41 of this approval.	
	Where the information / document relates to a particular Work or is required to be implemented, it must be published on the Proponent's website before the commencement of the relevant Work to which it relates or before its implementation.	
C11	<p>The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP:</p> <p>(a) Noise and vibration - relevant councils</p> <p>(b) Surface water quality - DPIE Water, Sydney Water (if there are any discharges to their assets) and relevant council(s)</p> <p>(c) DPIE Water</p>	<p>Section 1.10</p> <p>Section 3.3.1</p> <p>Section 7.2</p>



CoA	Condition Requirements	CEMP Reference
C12	Details of all information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant Construction Monitoring Programs, including copies of all correspondence from those agencies as required by Condition A5.	Section 1.10 Section 7.2
C13	Each <b>Construction Monitoring Program</b> must provide: (a) details of baseline data available; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the CSSI to be undertaken; (d) the parameters of the CSSI to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis of results against the relevant criteria; (h) details of methods that will be used to analyse monitoring data; (i) procedures to identify and implement additional mitigation measures where results of monitoring indicate unsatisfactory CSSI impacts; (j) a consideration of SMART principles; (k) any consultation to be undertaken in relation to the monitoring programs; and (l) any specific requirements as required by Condition C14.	Section 3.3.1 Section 7.2
C15	The Construction Monitoring Programs must be endorsed by the ER and then submitted to the Planning Secretary for approval at least one (1) month before the commencement of construction.	OCEMP
C16	Unless otherwise agreed with the Planning Secretary, construction must not commence until all of the relevant Construction Monitoring Programs have been approved by the Planning Secretary, and all relevant baseline data for the specific construction activity has been collected.	OCEMP Section 7.2

CoA	Condition Requirements	CEMP Reference
C17	The Construction Monitoring Programs, as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.	Section 7.2
C18	<p>The results of the <b>Construction Monitoring Programs</b> must be submitted to the Planning Secretary, and relevant government agencies, for information in the form of a <b>Construction Monitoring Report</b> at the frequency identified in the relevant <b>Construction Monitoring Program</b>.</p> <p><i>Note: Where a relevant <b>CEMP Sub-plan</b> exists, the relevant <b>Construction Monitoring Program</b> may be incorporated into that <b>CEMP Sub-plan</b>.</i></p>	Section 7.2
E34	Work must only be undertaken during the following hours:	Section 5.4.1
	a) 7:00 am to 6:00 pm Mondays to Fridays, inclusive;	
	b) 8:00 am to 6:00 pm Saturdays; and	
	c) At no time on Sundays or public holidays.	
E35	<p>Except as permitted by an EPL, highly noise intensive works that result in an exceedance of the applicable noise management level (NML) at the same receiver must only be undertaken:</p> <ul style="list-style-type: none"> <li>(a) between the hours of 8:00 am to 6:00 pm Monday to Friday;</li> <li>(b) between the hours of 8:00 am to 1:00 pm Saturday; and</li> <li>(c) if continuously, then not exceeding three hours, with a minimum cessation of work of not less than one hour.</li> </ul> <p>For the purposes of this condition, 'continuously' includes any period during which there is less than one hour between ceasing and recommencing any of the Work.</p>	Section 5.4.1

CoA	Condition Requirements	CEMP Reference
E36	<p>Notwithstanding Condition E34 and E35, Work may be undertaken outside the hours specified in any of the following circumstances:</p> <p>(a) <b>Safety and Emergencies</b>, including:</p> <ul style="list-style-type: none"> <li>(i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or</li> <li>(ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm.</li> </ul> <p>On becoming aware of the need for emergency work in accordance with Condition E36(a), the Proponent must notify the ER, the Planning Secretary and the EPA of the reasons for such emergency work. The Proponent must use best endeavours to notify all noise and/or vibration affected sensitive land user(s) of the likely impact and duration of the emergency work.</p> <p>(b) <b>Work that causes:</b></p> <ul style="list-style-type: none"> <li>(i) LAeq(15 minute) noise levels: <ul style="list-style-type: none"> <li>• no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and</li> <li>• no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and</li> </ul> </li> <li>(ii) LAFmax(15 minute) noise levels no more than 15 dB(A) above the rating background level at any residence during the night time period; and</li> <li>(iii) continuous or impulsive vibration values, measured at the most affected residence, that are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006); and</li> <li>(iv) intermittent vibration values measured at the most affected residence that are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006).</li> </ul> <p>(c) <b>By Approval</b>, including:</p> <ul style="list-style-type: none"> <li>(i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or</li> <li>(ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E37; or</li> <li>(iii) negotiated agreements with directly affected residents and sensitive land user(s).</li> </ul>	Section 5.4.2

CoA	Condition Requirements	CEMP Reference
E61	The CSSI must be constructed in a manner that minimises visual impacts of construction ancillary facilities, including but not limited to, providing temporary landscaping and vegetative screening of the construction sites, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located.	Section 2.3 of Appendix A4
E62	The CSSI must be constructed and operated with the objective of minimising light spillage to surrounding properties. All lighting associated with the construction and operation of the CSSI must be consistent with the requirements of Australian Standard 4282-2019 <i>Control of the obtrusive effects of outdoor lighting</i> , relevant Australian Standards in the series AS/NZ 1158 – <i>Lighting for Roads and Public Spaces</i> , and the <i>National Airports Safeguarding Framework (NASF)</i> Guideline E: <i>Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports</i> .	Section 2.3 of Appendix A4 Section 8.8 of the CNVMP
	Additionally, mitigation measures must be provided to manage residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.	
E75	The Proponent must identify the utilities and services (hereafter “services”) potentially affected by Work to determine requirements for diversion, protection and/or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. The Proponent in consultation with service providers must ensure that disruption to services resulting from the CSSI are avoided where possible and where unavoidable, customers are advised in accordance with the Communication Strategy required under Condition B1.	Table 2-1 Section 2.2 OCS
E83	Any property access that is physically affected by the CSSI must be reinstated to at least an equivalent standard, in consultation with the landowner or alternative access provided in consultation with the landowner.	Section 5.6 Appendix A4 OCS
E91	A Sustainability Strategy must be prepared to achieve a minimum excellent ‘Design’ and ‘As built’ rating under the Infrastructure Sustainability Council of Australia infrastructure rating tool.	Section 1.8 Sustainability Strategy M12 Central Sustainability Management Plan

## REMMs

The primary REMMs relevant to the development of this Plan are listed in Table 3-3 of the OCEMP. Secondary REMMs related, but not specific to the development of this Plan are listed in the table below. A cross reference is also included to indicate where the REMM is addressed in this Plan or other Project management documents.

ID	Measure/Requirement	Timing	CEMP Reference
B19	Emergency response protocols and procedures will be included in the Project CEMP and implemented in the event of a contaminant spill or leak.	During construction	Section 6.4.2 Appendix A7 PIRMP
B20	Spill kits will be located to allow for timely response to uncontained spills. Site inductions will include a briefing on the use of spill kits.	During construction	Section 5.3.1 Section 6.1 Appendix A7 PIRMP
LVIA05	Project elements such as ancillary facility hoardings will be designed and maintained to minimise impacts on landscape character and visual amenity. This will include selecting colours and materials that are visually recessive and blend into the surrounding landscape where practicable, and the prompt removal of graffiti.	Detailed design, prior to construction and during construction	Appendix A4 PDLP
LVIA07	Temporary and permanent lighting will be designed and implemented with consideration of:	Detailed design, prior to construction and during construction	Appendix A4 CNVMP, Section 8.7
	<ul style="list-style-type: none"> <li>The need to orientate lighting to minimise light spill and glare impacts on nearby receivers</li> </ul>		
	<ul style="list-style-type: none"> <li>The need to minimise vandalism and maintenance requirements</li> </ul>		
	<ul style="list-style-type: none"> <li>Requirements of the National Airports Safeguarding Framework (NASF) (National Airports Safeguarding Advisory Group, n.d.) for operational lighting</li> </ul>		
	<ul style="list-style-type: none"> <li>Opportunities to implement sustainability initiatives in design such as energy efficient or solar lighting</li> </ul>		

ID	Measure/Requirement	Timing	CEMP Reference
SLP01	Areas of land leased for the purposes of construction will be reinstated at the end of the lease to at least equivalent standard in consultation with the landowner.	During construction	Section 5.6 OCS
SLP07	Construction activities will be planned to minimise disruption to existing agricultural operations/activities in surrounding properties where feasible and reasonable (e.g. stock access, access to farm dams, etc) unless otherwise agreed by the landowner.	Prior to construction	Section 2.4 CTTMP OCS / CSEP
AH01	Procedures for consideration of heritage aspects within site inductions and toolbox talks for construction workers and supervisors	Prior to construction	Section 5.3.1 Section 5.3.2 CCHMP
AH03	A work method statement will be prepared for the works within identified Aboriginal sites in consultation with a suitably qualified and experienced archaeologist. The method statement will be prepared to minimise impacts on Aboriginal sites where feasible, including input into detailed design. Measures will include (but not be limited to):	Detailed design, prior to construction and during construction	Section 3.3.3 Section 3.3.4 CCHMP
	<ul style="list-style-type: none"> <li>Designing and locating bridges (including bridge pylons), haulage routes and other access roads to minimise potential disturbance of soils where feasible</li> <li>Focusing protection measures on the zone within 100 metres of creeks including consideration of opportunities to cover the original cultural deposits in temporary protective barriers such as geotextile fabric and a layer of clean fill.</li> </ul>		

## Hold Point and Witness Point Register

TfNSW QA spec	Clause	Type	Description	Applicable Plan	Reference
G36	3.1	Hold Point	Commencement of work not previously addressed by CEMS and CEMP documents and authorised by earlier Hold Point release. <i>This does not apply to Low Impact Work.</i>  At least 10 working days prior to the proposed commencement of the stage of WUC nominated in a submission and only following completion of the TfNSW/ER review process, submit the CEMP and associated Plans, Sub-Plans, Monitoring Programs and/or EWMS, as well as the CEMS documents listed in Clause 3.1 for the release of the Hold Point. The Principal may request additional information for inclusion in the CEMP before authorising the release of the Hold Point.	CEMP	CEMP, Section 1.12
G36	3.2.2	Hold Point	At least 5 working days prior to the activity, provide to TfNSW evidence of the receipt of the approval, licence and/or permit from the relevant authority.	CEMP	CEMP, Section 4.2.2
G36	3.2.4	Hold Point	At least 20 working days prior to the commencement of work activities not previously addressed by an endorsed EWMS, Seymour Whyte must provide an EWMS addressing the issues listed Clause 3.2.4 of G36 for the nominated work activities.	CEMP	CEMP, Section 3.3.3
G36	3.2.5	Hold Point	At least 10 working days prior to the commencement of Low Impact Work activities, Seymour Whyte must provide a Low Impact Work Method Statement addressing the issues listed Clause 3.2.5 of G36 for the nominated Low Impact Work activities.	CEMP	CEMP, Section 3.3.8
G36	3.5.2	Hold Point	At least 10 working days before it is planned to be used, drafts of all environmental induction and/or online materials must be provided to TfNSW for endorsement.	CEMP	CEMP, Section 5.3.1



TfNSW QA spec	Clause	Type	Description	Applicable Plan	Reference
G36	3.10	Hold Point	For any activity stopped by TfNSW that causes or has the potential to cause harm to the environment due to a failure to meet the environmental obligations under the Contract (including recurring issues from checklists, reviews, improvements notices, inspections, audits and surveillance) will require verification that the failure has been rectified and detailed of the measures implemented to prevent reoccurrence.	CEMP	CEMP, Section 7.3.4
G36	3.11	Hold Point	The final Pre-Construction Compliance Report must be provided to TfNSW at least 10 working days before commencement of construction.	CEMP	CEMP, Section 7.5
G1	10	Hold Point	On-Site establishment of Contractor's compound.	SEMP	SEMP, Section 9.5
G1	10	Hold Point	On-Site establishment of Contractor's stockpile sites.	CSWMP	CSWMP, Stockpile management protocol
G1	13	Hold Point	Pre-Construction Condition Survey Reports prior to commencement of construction.	CEMP	CEMP, Section 7.5
G10	1.7.4	Hold Point	Submission of traffic control personnel details	CTTMP	CTTMP, Section 6.1.2
G10	2.1	Hold Point	Submission of ROL	CTTMP	CTTMP, Section 5.4
G10	2.2.1	Hold Point Hold Point	Submission of Traffic Management Plan (TMP) and associated documents	CTTMP	CTTMP, Section 5.1
G10	2.4.1	Hold Point	Submission of Traffic Control Plan (TCP), where submitted separately from TMP	CTTMP	CTTMP, Section 5.1
G10	4.4.2	Hold Point	Opening of temporary roadway or detour to traffic	CTTMP	CTTMP, Section 5.3

TfNSW QA spec	Clause	Type	Description	Applicable Plan	Reference
G36	4.6	Hold point	At least 30 working days prior to the commencement of pile driving, excavation by hammering or ripping, dynamic compaction, demolition operations, or any other activity which may cause damage through vibration, provide TfNSW with a copy of the Pre-Constriction Condition Survey reports and the CNVMP.	CNVMP	CNVMP, Section 8.5 (NV26) and Section 9.6
G40	2.4	Hold Point	Submission of Clearing and Grubbing Plan and other required documents prior to clearing any area	CFFMP	CFFMP, Section 6.1 and Appendix B
G40	6.1	Hold Point	Submission of Weed, Pest and Pathogen Management Plan prior to clearing in any area.	CFFMP	CFFMP, Section 6.6 and Appendix E
G38	1.2.7	Hold Point	Submission of evidence of appropriate Soil and Water Management Plan and Erosion and Sediment Control personnel	CSWMP	CSWMP, Section 6.1 and 7.1
G38	2.1.2	Hold Point	Submission of SWMPs	CSWMP	CSWMP, Section 1.5.1
G38	3.1	Hold Point	Submission of an ESCP(s) and, where required, WQMP for a section of the Work Under the Contract	CSWMP	CSWMP, Section 6.1
G38	3.1	Witness	Submission of written notice that measures set out in the ESCP for a section of the work have been installed.	CSWMP	CSWMP, Section 6.1
G38	3.9	Hold Point	Commencement of construction of any activities in flood prone areas	CSWMP	CFMP
G36	4.2	Hold Point	Submission of proposed NSW EPA accredited site auditor	CCLMP	CCLMP, Section 7.1.1
G36	4.2	Hold Point	Submission of Remediation Remedial Action Plan for contaminated land (where the Remedial Action Plan is to be prepared by the Contractor)	CCLMP	CCLMP, Section 6.2

TfNSW QA spec	Clause	Type	Description	Applicable Plan	Reference
G36	4.2	Hold Point	Submission of Section A Site Audit Statement and accompanying Site Audit Report	CCLMP	CCLMP, Section 6.2
G36	4.2	Hold Point	Submission of Draft Long Term Environmental Management Plan	CCLMP	CCLMP, Section 6.3
G36	4.13	Hold Point	At least 10 working days prior to commencing Physical Work on Site in or near an environmentally sensitive area, prepare an EWMS which includes the details of the environmental protection measures to be implemented at that location in accordance with G40/E (Flagging Protocol). Clearly delineate the environmentally sensitive area and signpost the locations and boundaries.	CCHMP	CCHMP, Section 6, Table 6-1 (CH01)
R272	3.2	Hold Point	Submission of report identifying suitable locations for AWS, and relevant certificates	CAQMP	CAQMP, Section 7.6 and Appendix B
R272	7.3.2	Witness Point	Calibration of AWS instruments	CAQMP	CAQMP, Section 7.6 and Appendix B
R272	8.3	Hold Point	Verification of correct sensor operation and submission of decommissioning report	CAQMP	CAQMP, Section 7.6 and Appendix B
R38	3.9	Hold Point	At least 10 working days prior to commencing construction of any activity in / around waterways, submit your Flood Management Sub-Plan.	CFMP	CFMP
G36	4.11.4	Hold Point	Transport of waste generated under the Contract to the “waste site”. Including Completion and signed copy of “approved notice” and supporting documents, as listed under items (a) to (g) in Clause 4.11.4.	CWRMP	CWRMP, Section 5

# Appendix A2

## Initial Risk Register

M12 Motorway - Central

January 2025

## Risk Assessment and Management Approach

The aspects and impacts in Section 4.1 of the CEMP have been worked into this initial risk assessment. The risk management process involved an assessment of all specific activities/aspects and resulted in the development of a list of environmental risks (impacts) and a corresponding risk mitigation strategy and risk ranking.

Each environmental risk was categorised, based on the following:

- The environmental aspect
- Relative scale of the potential impact
- Type of potential impact
- Likelihood of occurrence.

Table 1 identifies the likelihood criteria used for the initial risk assessment. The identification of risks included a revision of the proposed works, the CoA, REMMs, and revision of the environmental risks identified by the Environment Assessment Documentation. The risk matrix identified in Table 2 has been used to undertake the risk assessment located in Table 3.

**Table 1: Likelihood criteria**

Likelihood	Definition	Probability
Almost certain	Expected to occur frequently during time of activity or project (10 or more times per year)	>90%
Likely	Expected to occur occasionally during time of activity or project 75% to 90% (1 to 10 times per year)	75% to 90%
Possible	More likely to occur than not occur during time of activity or project 50% to 75% (once per year)	50% to 75%
Unlikely	More likely to not occur than occur during time of activity or project 25% to 50% (once every 1 to 10 years)	25% to 50%
Rare	Not expected to occur during the time of the activity or project 10% to 25% (once every 10 to 100 years)	10% to 25%
Almost unprecedented	Not expected to ever occur during time of activity or project (less than once every 100 years)	<10%

**Table 2: Risk assessment matrix**

Likelihood	Consequence					
	Insignificant	Minor	Moderate	Major	Severe	Catastrophic
Almost certain	Moderate	High	High	Very high	Very high	Very high
Likely	Moderate	Moderate	High	High	Very high	Very high
Possible	Low	Moderate	Moderate	High	High	Very high
Unlikely	Low	Low	Moderate	Moderate	High	High
Rare	Very low	Low	Low	Moderate	Moderate	High
Almost unprecedented	Very low	Very low	Low	Low	Moderate	Moderate

General management measures and requirements to reduce environmental impact of each activities is detailed in Table 3. Furthermore, aspect-specific management measures are detailed in full within each aspect-specific Sub-plan.

**Table 3: Initial construction risk assessment**

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
Demolition of buildings	Noise and vibration impacts to surrounding sensitive receivers' potential to be highly intrusive at NCA06 and 07.	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Demolition impacts to be reviewed in Noise and Vibration Impact Statement for standard hours works and ancillary facilities to identify potential highly noise intensive works.</li> <li>Pre-Construction Condition Survey to be completed prior to commencement of demolition in accordance with G36 Clause 4.6 Hold Point.</li> <li>Demolition to be completed during standard construction hours where NML would be exceeded outside of the standard construction hours.</li> <li>Notifications to be issued to affected sensitive receivers prior to the commencement of works.</li> <li>Noise monitoring to be completed in accordance with the Noise and Vibration Monitoring Program (CNVMP App. B).</li> </ul>	Construction Manager Superintendent ESR Demolition contractor	Possible	Moderate	Moderate
Demolition of buildings	Demolition of building expose hazardous materials	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Hazardous Building Materials (HBM) audits to be completed out in accordance with Australian Standard (AS 2601-2001): of each structure prior to demolition (refer to CCLMP Section 4.2.3).</li> <li>Hazardous Building Materials Management Plan(s) to manage the removal of known and unexpected hazardous building during demolition activities (refer to CCLMP Section 6.6).</li> <li>Occupational Hygienist must be on Site during demolition of works.</li> <li>All waste generated by the M12 Central package will be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal docketts retained for audit purposes. (Refer to the CWRMP for processes around waste classification and tracking)</li> </ul>	Construction Manager Superintendent ESR	Possible	Moderate	Moderate
Demolition of buildings	Demolition results in generation of dust / air quality impacts to surrounding sensitive receivers'	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Dust suppression (water)</li> <li>Wind / weather monitoring</li> </ul>	Demolition contractor ESR	Possible	Moderate	Moderate
Demolition of buildings	Impacts to wildlife, specifically microbats, residing in built structures to be demolished	Unlikely	Moderate	Low	<ul style="list-style-type: none"> <li>Pre-clearance surveys for microbat surveys to be completed prior to demolition of structures identified as potential roosting sites for microbats in accordance with Biodiversity Guidelines: Protecting and managing biodiversity on RTA projects (RTA, 2011) (Guide 1: Pre-clearing process).</li> </ul>	Project Ecologist	Rare	Moderate	Low
Site clearing works including: <ul style="list-style-type: none"> <li>Clear and grub</li> <li>Topsoil stripping</li> <li>Environmental controls</li> <li>Fencing</li> <li>Property adjustments</li> </ul>	Accidental clearing outside of the construction boundary	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Flagging of limit of clearing in accordance with the G40/E Flagging Protocol and verified by project Ecologist in G40 Clause 2.4 Hold Point including Exclusion zones and vegetation saving areas.</li> <li>All site personnel to undertake site inductions outlining no vegetation or tree removal will be undertaken without prior approval</li> </ul>	Project Manager Construction Manager Superintendent ESR	Unlikely	Moderate	Moderate



Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Preparation of Clearing and Grubbing EWMS. All personnel involved in the activity be trained in, and sign onto, the EWMS.</li> <li>Daily pre-clearing survey by Project Ecologist to include checking limit of clearing flagging is still in place.</li> <li>Daily pre-start meetings outlining the vegetation areas to be cleared for the day.</li> <li>Clearing will be undertaken in accordance with the staged Vegetation Clearing Procedure (refer to CFFMP App. B).</li> </ul>				
Site clearing works continued	Impacts on unexpected threatened species	Unlikely	Moderate	Moderate	<ul style="list-style-type: none"> <li>All site personnel to undertake site induction including details of the threatened species with potential to be encountered on the M12 Central Package works.</li> <li>Threatened species surveys to be completed as part of the pre-clearing surveys prior to construction activities by a suitably qualified ecologist as detailed in the Pre-clearing survey procedure to be developed in accordance with G36 clause 2.4.2.</li> <li>Sensitive Area Plans to be updated in the event that unexpected threatened species are identified.</li> <li>Toolbox talks regarding the potential for unexpected threatened species will be undertaken</li> <li>Implementation of the Unexpected Threatened Species or EEC Finds Procedures in accordance with Guide 1 of the <i>Biodiversity Guidelines</i> (RTA, 2011), (CFFMP Appendix D).</li> </ul>	ESR Project Ecologist	Rare	Moderate	Low
Site clearing works	Wildlife injury during clearing	Likely	Major	High	<ul style="list-style-type: none"> <li>Pre-clearing surveys to be completed in accordance with the Vegetation Clearing Procedure (refer CFFMP Appendix B).</li> <li>Two phase clearing process to removed hollow bearing and habitat trees at least 24 hours following removal of non-habitat trees and shrubs (refer CFFMP Appendix B).</li> <li>Around 70% of nest boxes to be installed prior to clearing to provide alternate rooting sites for displaced wildlife.</li> <li>Project Ecologist to supervise clearing of hollow bearing trees and complete wildlife rescue (refer CFFMP Appendix C).</li> <li>Notify WIRES and local vets prior to commencement of clearing.</li> </ul>	ESR Project Ecologist	Likely	Minor	Moderate
Site clearing works	Clearing limits around riparian zone fail to be observed	Likely	Moderate	High	<ul style="list-style-type: none"> <li>G40 clearing controls around riparian areas detailed in ecologists report for G40 Clause 2.4 Hold Point.</li> </ul>	Project Ecologist	Possible	Minor	Moderate
Site clearing works	Spreading of noxious weeds and pathogens via personnel, plant / equipment, topsoil / mulch	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Project Ecologist to identify weeds on site and include weed mapping in the Ecologist pre-clearing inspection report for G40 Clause 2.4 hold point</li> <li>Project Ecologist to report on any areas of dieback or other pathogens and include in mapping in the Ecologist pre-clearing inspection report for G40 Clause 2.4 hold point. Where suspected, phytophthora testing to be completed.</li> </ul>	ESR Project Ecologist Superintendent	Possible	Minor	Moderate

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Toolbox talks regarding the location and treatment of weeds</li> <li>Works will be carried out such that no noxious weeds are imported to the site or around the site including the washing of wheels of all plant prior to transportation to site</li> <li>Hygiene protocols outlined in the Weed and Pathogen Management Plan (CFFMP Appendix E) will be implemented throughout site clearing activities.</li> </ul>				
Site clearing works	Generation of dust	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Construction activities with the potential to generate dust will be modified or ceased during high winds to reduce the potential for dust generation</li> <li>Access roads within the construction boundary will be maintained and managed to reduce dust generation</li> <li>Stockpiles that have the potential to result in dust generation will be minimised at all times and comply with RMS – <i>Stockpile Site Management Guideline</i> (May 2015) in accordance with Soil and Water Management Plan (Appendix B4 of the OCEMP)</li> <li>During high wind and/or dry conditions, programming of dust generating activities is to be considered in order to reduce nuisance to neighbouring properties</li> <li>Adequate dust suppression will be available and applied where required e.g. watercart.</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager) Superintendent ESR	Possible	Moderate	Moderate
Site clearing works, topsoil stripping	Works in contaminated areas exposing asbestos / contaminants	Almost certain	Major	Very High	<ul style="list-style-type: none"> <li>EWMS will be prepared for topsoil stripping including temporary stockpiling and disposal of excavated material and protocols for the management of materials containing asbestos prior to commencement of topsoil stripping (refer CCLMP Section 1.5).</li> <li>EWMS to be reviewed TfNSW under G36 6.2.4 Hold Point</li> <li>All topsoil stripping supervised by Occupational Hygienist.</li> <li>The Occupational Hygienist is to observe and inspect all topsoil removal works and provide ongoing direction regarding the appropriate management of topsoil that is identified or considered likely to be contaminated (including the presence of asbestos).</li> </ul>	ESR Occupational Hygienist	Almost certain	Moderate	High
Site clearing works	Bushfire	Possible	Severe	High	<ul style="list-style-type: none"> <li>Prepare and implement a Work Health and Safety Management Plan that incorporate measures to manage and mitigate bushfire risk</li> <li>All site personnel to be inducted on bushfire hazards and how they are to be managed</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle</li> <li>All works involving a fire source will have a hot works permit in place with specific controls to prevent fire risk</li> <li>No smoking (including e-cigarettes) will be allowed on site except at designated areas. Dedicated butt disposals will be located in all designated smoking areas</li> </ul>	Project Manager Construction Manager Superintendent, ESR	Rare	Severe	Moderate

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Cutting, welding or grinding will not be undertaken on total fire ban days, unless the works takes place in an area at least 50 metres away from an ignition source and appropriate fire controls are in place</li> <li>Vehicles will not be driven or idled in areas of long grass on fire ban days or after prolonged periods of dry weather.</li> </ul>				
Site clearing works, topsoil stripping	Erosion and sedimentation impacting nearby dams or downstream watercourses due to exposed land, inadequate controls or control failure	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Erosion and sediment control plan to be prepared by suitability qualified and trained persons, reviewed by Seymour Whyte's Soil Conservationist and submitted to TfNSW under G38 Clause 3.1 hold point prior to commencement of topsoil stripping in each catchment.</li> <li>Erosion and sediment control measures to be implemented prior to commencement of topsoil stripping and earthworks.</li> <li>Submit G38 Clause 3.1 witness point to confirm erosion and sediment controls have been installed in accordance with the Erosion and sediment control plan.</li> <li>All site personnel will undergo a site induction and ongoing toolbox talks outlining erosion and sediment control management measures</li> <li>Hardstand areas and surrounding public roads will be cleaned as required, using methods such as street sweepers.</li> </ul>	ESR Superintendent Seymour Whyte's Soil Conservationist	Possible	Moderate	Moderate
Site clearing works	Inappropriate disposal of waste (including, vegetation and contaminated materials) or disposal at an unlicensed waste facility	Possible	Major	High	<ul style="list-style-type: none"> <li>Detailed site investigations to be completed, and Remediation Action Plan (RAP) to be developed, prior to commencement soil disturbance in moderate or high-risk Areas of Environmental Concern (EAC).</li> <li>The Occupational Hygienist is to observe and inspect all topsoil removal works and provide ongoing direction regarding the appropriate management of topsoil that is identified or considered likely to be contaminated (including the presence of asbestos).</li> <li>Stockpile management procedure to be developed and implemented to prevent mixing of spoil of different waste classification and track movement of contaminated soils (CSWMP Appendix H)</li> <li>Prior to disposal of waste offsite, except when transporting to a licenced waste disposal facility, Seymour White will provide TfNSW with evidence that the site is lawfully permitted to receive the nominated waste (refer to Section 5.1.5 of the CWRMP for details).</li> <li>All site personnel will undergo a site induction that will detail waste and resource management measures. Additional targeted toolbox talks will be given on waste disposal from time to time.</li> <li>Suitably licensed waste contractors will be used for the collection and transport of all waste for either offsite processing and/or disposal to an appropriately licensed facility.</li> </ul>	ESR Supervisor	Unlikely	Moderate	Moderate

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Receipts for waste transfer and disposal will be checked to ensure all details are correct and retained for audit purposes</li> <li>Waste register to be maintained to track all waste disposal from the site. This will include check of all proposed waste disposal facilities EPL or Section 143 notice prior to commencement of waste disposal.</li> </ul>				
Site clearing works	Traffic impacts on local roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Designated haul routes will be used, as identified in the Environmental Assessment Documentation, including the M7 Motorway, Elizabeth Drive and The Northern Road for heavy vehicles</li> <li>Traffic Guidance Scheme (TGS) will be prepared and provided to TfNSW under G10 Clause 2.4 hold point.</li> <li>Drivers will be inducted on the haulage roads including the use of The Northern Road and avoidance of other local roads</li> </ul>	Traffic Manager	Unlikely	Minor	Low
Site clearing works	Tracking of mud from site on public roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Site exit points will be fitted with appropriate controls to limit tracking of material out of site as soon as possible to limit the amount of material transported off site. Controls may include hardstand material; wheel washes; rumble grids; rip rap etc.</li> <li>Street sweepers will be used to manage sediment/mud tracking.</li> </ul>	Superintendent	Unlikely	Minor	Low
Site clearing works	Noise and vibration impacts to sensitive receivers	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Works to be completed during standard construction hours where possible.</li> <li>All construction plant and equipment used on site will be fitted with properly maintained noise suppression devices in accordance with the manufacturer's specifications.</li> <li>Community updates will be provided throughout the construction works, when necessary</li> <li>Noise and vibration impact statement for works in standard construction hours to be prepared to identify receivers at risk high noise impacts. These works will be subject to respite periods as outlined in NSW CoA E37 and NSW CoA E45-E47</li> <li>The Noise and Vibration Monitoring Program presented in the CNVMP Appendix B will be implemented throughout the duration of construction activities</li> </ul>	ESR Construction Manager Superintendent	Unlikely	Minor	Low
Site clearing works	Contamination of soil or water due to a spill or leak from plant/equipment or chemicals required for construction purposes	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Hazardous substance handling and use will be conducted away from drainage, stormwater lines and waterways and, wherever possible, within defined bunds</li> <li>Safety Data Sheets will be obtained for dangerous goods and hazardous substances stored onsite before their arrival</li> <li>All site personnel will be responsible for ensuring that refuelling undertaken on site will be undertaken in designated areas only, outside riparian areas and well away from drainage, stormwater inlets or waterways</li> </ul>	ESR Supervisor	Unlikely	Minor	Low

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Hazardous materials will be stored on drip trays or have secondary containment and be located at least 30m from the dam</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle</li> <li>Any spills or leaks will be immediately contained and absorbed</li> </ul> <p>Spill kits will be placed at strategic locations (e.g. access points, plant/ machinery storage areas)</p>				
Site clearing works	Missed opportunities to maximise the beneficial re-use of waste	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Resource recovery will be applied to the management of waste and will include the recovery of resources for reuse-reusable materials generated by the construction and will be segregated for reuse on site, or off site, where possible</li> <li>Recovery of recyclable resources generated during construction</li> <li>Recovery of resources for reprocessing, such as the onsite mulching of cleared vegetation for use in landscaping use, in the absence of a higher beneficial use being identified</li> <li>Segregation of resources for recycling for effective processing at recycling facility</li> <li>Prior to the commencement of clearing, a Reuse strategy will be prepared by the Construction Contractor detailing practicable options to reuse native trees or vegetation that are to be removed</li> <li>Where offsite reuse is proposed, the Construction Ecologist is to examine the material as per EPA Mulch Order 2016.</li> </ul>	ESR Project Ecologist Supervisor	Unlikely	Minor	Low
Contaminated land management	Unlicensed disposal of contaminated waste offsite	Possible	Major	High	<ul style="list-style-type: none"> <li>Detailed site investigations to be completed prior to commencement soil disturbance in moderate or high-risk Areas of Environmental Concern (EAC).</li> <li>The Occupational Hygienist is to observe and inspect all topsoil removal works and provide ongoing direction regarding the appropriate management of topsoil that is identified or considered likely to be contaminated (including the presence of asbestos).</li> <li>Stockpile management procedure to be developed and implemented to prevent mixing of spoil of different waste classification and track movement of contaminated soils (CSWMP Appendix H)</li> <li>Prior to disposal of waste offsite, except when transporting to a licenced waste disposal facility, Seymour White will provide TfNSW with evidence that the site is lawfully permitted to receive the nominated waste (refer to Section 5.1.5 of the CWRMP for details).</li> <li>All site personnel will undergo a site induction that will detail waste and resource management measures. Additional targeted toolbox talks will be given on waste disposal from time to time.</li> </ul>	Construction Manager ESR Supervisor	Possible	Minor	Moderate

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Suitably licensed waste contractors will be used for the collection and transport of all waste for either offsite processing and/or disposal to an appropriately licensed facility.</li> <li>Receipts for waste transfer and disposal will be checked to ensure all details are correct and retained for audit purposes</li> <li>Waste register to be maintained to track all waste disposal from the site. This will include check of all proposed waste disposal facilities EPL or Section 143 notice prior to commencement of waste disposal.</li> <li>Load sheets and Material tracking register to be maintained</li> <li>Trucks transporting spoil to be equipped with GPS Tracking (offsite).</li> </ul>				
Contaminated land management	Movement of contaminated material within site	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Detailed site investigations to be completed, and Remediation Action Plan (RAP) to be developed, prior to commencement soil disturbance in moderate or high-risk Areas of Environmental Concern (EAC).</li> <li>The Occupational Hygienist is to observe and inspect all topsoil removal works and provide ongoing direction regarding the appropriate management of topsoil that is identified or considered likely to be contaminated (including the presence of asbestos).</li> <li>Stockpile management procedure to be developed and implemented to prevent mixing of spoil of different waste classification and track movement of contaminated soils (CSWMP Appendix H)</li> <li>EPA Site Auditor to review and verify implementation of the RAP (refer to the CCLMP Section 6.2).</li> </ul>	Construction Manager ESR Supervisor	Possible	Minor	Moderate
Contaminated land management	Failure to achieve adequate encapsulation	Possible	Major	High	<ul style="list-style-type: none"> <li>Proposed encapsulation areas to be designed in accordance with the RAP as approved by the EPA Site Auditor.</li> <li>A Contaminated Site Specialist will be engaged and will be responsible, under the direction of Seymour Whyte, for the implementation of the environmental controls relating to contaminated land for the M12 Central package.</li> <li>Where the RAP includes encapsulation of Asbestos-Containing Material (ACM), a long-term environmental management plan (LTEMP) will be prepared.</li> </ul>	Construction Manager	Possible	Minor	Moderate
Utility relocation and protection	Working outside project boundary impacts to flora and fauna, heritage areas, contaminated etc. Outside of planning approval	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Consistency assessments will be prepared for works proposed outside the approved project boundary including utility protection and relocation works.</li> <li>The consistency assessment will be supported by relevant technical reviews and approved by TfNSW (the Proponent) prior to commencement of the works.</li> </ul>		Unlikely	Minor	Low



Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
Utility relocation and protection	Discharge of chlorinated water mains				<ul style="list-style-type: none"> <li>An EWMS will be prepared for any Sydney water cutover works that propose to discharge potable (chlorinated) water.</li> <li>The EWMS will be prepared in accordance with Sydney Water Discharge protocols (Standard Operating Procedure) (2015, WPIMS5021) which includes de-chlorination procedures.</li> <li>Any discharge from the EPL Premises area will be subject to and in compliance with the EPL discharge conditions.</li> </ul>				
Utility relocation and protection	Night works causing disturbance to surrounding residential receivers	Likely	Moderate	High	<ul style="list-style-type: none"> <li>A noise screening assessment will be completed of all works proposed outside the standard construction hours.</li> <li>A Noise and Vibration Impact Statement (NVIS) in accordance with CoA E40 (refer to CNVMP Section 7.4). The NVIS will standard and additional mitigation measures to mitigate impacts.</li> <li>An internal OOHW permit will be issued to confirm compliance with the EPL.</li> </ul>	ESR	Possible	Moderate	Moderate
Utility relocation and protection	Impact to traffic and utility consumers	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Traffic Guidance Scheme (TGS) will be prepared and provided to TfNSW under G10 Clause 2.4 hold point.</li> </ul> <p>Consultation will be completed with affected utility providers to coordinate any impacts to consumers.</p>	Traffic Manager Engineers	Possible	Moderate	Moderate
General earthworks and drainage	Complete or partial loss of an unexpected heritage item while undertaking general earthworks and drainage	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>No go zones on Sensitive Area Plans</li> <li>All works to be undertaken in accordance with the CCHMP (Appendix B5 of the OCEMP)</li> <li>Any excavations, intrusive works or other operations that have the potential to impact areas of known heritage, cultural or archaeological items must not be undertaken prior to heritage salvage</li> <li>Any item of potential Aboriginal archaeological/cultural heritage conservation significance, or human remains discovered during the construction works will be managed in accordance with the Unexpected Finds Procedure provided in the CCHMP</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Moderate	Moderate
General earthworks and drainage	Erosion and sedimentation impacting nearby dams or downstream watercourses due to exposed land, inadequate controls or control failure	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>End of day controls implemented</li> <li>ESCPs will be prepared for all work and implemented in advance of site disturbance</li> <li>All site personnel will undergo a site induction and ongoing toolbox talks outlining erosion and sediment control management measures</li> <li>Hardstand areas and surrounding public roads will be cleaned as required, using methods such as street sweepers</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Moderate	Moderate
General earthworks and drainage	Generation of dust	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Construction activities with the potential to generate dust will be modified or ceased during high winds to reduce the potential for dust generation</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager,	Possible	Moderate	Moderate



Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Access roads within the construction boundary will be maintained and managed to reduce dust generation</li> <li>Stockpiles that have the potential to result in dust generation will be minimised at all times and comply with RMS – <i>Stockpile Site Management Guideline</i> (May 2015) in accordance with SWH4 (Appendix B4 of the OCEMP)</li> <li>During high wind and/or dry conditions, programming of dust generating activities is to be considered in order to reduce nuisance to neighbouring properties</li> <li>Adequate dust suppression will be available and applied where required e.g., watercart, misters.</li> </ul>	Superintendent, ESR)			
General earthworks and drainage	Inappropriate disposal of waste (including, vegetation and contaminated materials) or disposal at an unlicensed waste facility	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>All site personnel working on-site will undergo a site induction that will detail waste and resource management measures</li> <li>Additional targeted toolbox talks will be given on waste disposal from time to time</li> <li>HAZMAT surveys will be undertaken and removal of asbestos will be undertaken prior to demolition activities (if required)</li> <li>Suitably licensed waste contractors will be used for the collection and transport of all waste for either offsite processing and/or disposal to an appropriately licensed facility. Receipts for waste transfer and disposal will be checked to ensure all details are correct and retained for audit purposes</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Moderate	Moderate
General earthworks and drainage	Traffic impacts on local roads Exporting spoil	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Designated haul routes will be used, as identified in the Environmental Assessment Documentation, including the M7 Motorway, Elizabeth Drive.</li> <li>Measures identified in the Traffic Control Plan (TCP) (if developed) will be implemented</li> <li>Drivers will be inducted on the haulage roads including the use avoidance of other local roads</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low
General earthworks and drainage	Tracking of mud from site on public roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Site exit points will be fitted with appropriate controls to limit tracking of material out of site as soon as possible to limit the amount of material transported off site. Controls may include hardstand material; wheel washes; rumble grids; rip rap etc.</li> <li>Street sweepers will be used to manage sediment/mud tracking.</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low
General earthworks and drainage	Noise and vibration impacts to nearby sensitive receivers	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Overarching NVIS prepared for daytime and</li> <li>Maximise works during the standard construction hours</li> <li>All construction plant and equipment used on site will be fitted with properly maintained noise suppression devices in accordance with the manufacturer's specifications</li> <li>Erection of temporary acoustic barriers will be completed, where required</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Community updates will be provided throughout the construction works, when necessary</li> <li>Activities resulting in high noise impacts will be subject to respite periods as outlined in NSW CoA E37 and E45-E47</li> <li>The Noise and Vibration Monitoring Program (Appendix D) will be implemented throughout the duration of construction activities</li> </ul>				
General earthworks and drainage	Impacts on visual amenity i.e. light spill	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Lights will be located as far away as possible and directed away from neighbours/sensitive receivers</li> <li>Boundary screening will be installed in accordance with NSW CoA A21 and A22</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low
General earthworks and drainage	Contamination of soil or water due to a spill or leak from plant/equipment or chemicals	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Hazardous substance handling and use will be conducted away from drainage, stormwater lines and waterways and, wherever possible, within defined bunds</li> <li>Safety Data Sheets will be obtained for dangerous goods and hazardous substances stored onsite before their arrival</li> <li>All site personnel will be responsible for ensuring that refuelling undertaken on site will be undertaken in designated areas only, outside riparian areas and well away from drainage, stormwater inlets or waterways</li> <li>Hazardous materials will be stored on drip trays or have secondary containment and be located at least 30m from the dam.</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle</li> <li>Any spills or leaks will be immediately contained and absorbed</li> <li>Spill kits will be placed at strategic locations (e.g. access points, plant/ machinery storage areas)</li> <li>In addition to the mitigation measures above, SWH1 to SWH14 from Appendix B4 of the OCEMP will be implemented.</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Moderate	Moderate
General earthworks and drainage	Missed opportunities to maximise the beneficial re-use of waste	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Resource recovery will be applied to the management of waste and will include the recovery of resources for reuse-reusable materials generated by the construction and will be segregated for reuse on site, or off site, where possible</li> <li>Recovery of recyclable resources generated during construction</li> <li>Recovery of resources for reprocessing, such as the onsite mulching of cleared vegetation for use in landscaping use, in the absence of a higher beneficial use being identified</li> <li>Segregation of resources for recycling for effective processing at recycling facility</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Prior to the commencement of clearing, a Reuse strategy will be prepared by the Construction Contractor detailing practicable options to reuse native trees or vegetation that are to be removed</li> <li>Where offsite reuse is proposed, the Construction Ecologist is to examine the material as per EPA Mulch Order 2016.</li> </ul>				
Transverse drainage	Temporary creek crossings impacting water quality	Likely	Moderate	High	<ul style="list-style-type: none"> <li>EWMS to be prepared for construction of temporary creek crossings in accordance with G36 and in consultation with DPI Fisheries. EWMS to be submitted to TfNSW in accordance with G36 Clause 3.2.4 Hold Point.</li> <li>Design, construct and maintain the crossing in accordance with the requirements of the BLUE BOOK</li> <li>use material that will not result in fine sediment material entering the waterway. Rock used must be hard, sound, durable rock, free of fine particles and not contaminated with foreign materials</li> <li>provide erosion and sediment controls at entry/exits points of the crossing to minimise mud tracking on the crossing</li> <li>Erosion and sediment controls to be documented on the erosion and sediment control plans and reviewed by Seymour Whyte's Soil Conservationist.</li> </ul>	ESR Construction Manager Supervisor	Unlikely	Moderate	Moderate
Transverse drainage	Temporary creek crossings impacting water flow (flooding)	Possible	Major	High	<ul style="list-style-type: none"> <li>In accordance with TfNSW QA Specification G38, TfNSW will run up to three modelling scenarios for the proposed temporary works using its flood model to understand flooding impacts during construction (Seymour Whyte will be responsible for any time and cost associated with any further required modelling). Seymour Whyte will provide TfNSW with a 3D model of the proposed temporary drainage and earthwork extents for TfNSW to run the flood modelling. The modelling must be completed prior to the commencement of any temporary drainage works or earthworks beyond those in the current model (including stockpiling). Seymour Whyte will allow 14 days for each model to be set up and analysed.</li> </ul>	Construction Manager	Possible	Moderate	Moderate
Transverse drainage	Fish passage	Likely	Minor	Moderate	<ul style="list-style-type: none"> <li>Temporary water crossings to be designed, constructed and maintained in accordance with DPI Fisheries guideline "Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings. And Fishnote – Policy and Guidelines for Fish Friendly Waterway Crossings (Ref: NSW – 1181) (NSW Fisheries, November 2003).</li> <li>Temporary design demonstrating fish passage to be provided to DPI Fisheries with EWMP for temporary waterway crossing.</li> </ul>	ESR	Unlikely	Minor	Low
Transverse drainage	Works in waterways	Likely	Moderate	High	<ul style="list-style-type: none"> <li>EWMS to be prepared for construction of culverts, including associated staging, flow diversions, any dewatering, short- and long-term stabilisation and removal of existing structures in accordance with G36 and in consultation with DPI Fisheries. EWMS to be submitted to TfNSW in accordance with G36 Clause 3.2.4 Hold Point.</li> </ul>	ESR Soil Conservationist	Possible	Moderate	Moderate

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Erosion and sediment controls to be documented on the erosion and sediment control plans and reviewed by Seymour Whyte's Soil Conservationist.</li> </ul>				
Transverse drainage	Temporary diversion	Likely	Moderate	High	<ul style="list-style-type: none"> <li>EWMS to be prepared for construction of culverts, including associated staging, <u>flow diversions</u>, any dewatering, short- and long-term stabilisation and removal of existing structures in accordance with G36 and in consultation with DPI Fisheries. EWMS to be submitted to TfNSW in accordance with G36 Clause 3.2.4 Hold Point.</li> <li>Erosion and sediment controls to be documented on the erosion and sediment control plans and reviewed by Seymour Whyte's Soil Conservationist.</li> </ul>	ESR Soil Conservationist	Possible	Moderate	Moderate
Bridge construction	Piling works in channel	Likely	Moderate	High	<ul style="list-style-type: none"> <li>EWMS to be prepared for construction of culverts, including associated staging, flow diversions, any dewatering, short- and long-term stabilisation and removal of existing structures in accordance with G36 and in consultation with DPI Fisheries. EWMS to be submitted to TfNSW in accordance with G36 Clause 3.2.4 Hold Point.</li> </ul>	ESR Soil Conservationist	Possible	Moderate	Moderate
Bridge construction	Concrete washout	Likely	Moderate	High	<ul style="list-style-type: none"> <li>EWMS to be prepared for Construction and operation of concrete wash out areas in accordance with G36 and in consultation with DPI Fisheries. EWMS to be submitted to TfNSW in accordance with G36 Clause 3.2.4 Hold Point.</li> <li>Designated concrete washout area to be established prior to commencement of any concrete works at each site / area.</li> <li>Training including induction and toolbox meetings to train all staff in risks and requirements around concrete washout.</li> </ul>	ESR Superintendent	Possible	Moderate	Moderate
Bridge construction above creek lines	Wet curing, stitch / infill pours resulting in concrete or alkaline water spilling into waterways	Likely	Moderate	High	<ul style="list-style-type: none"> <li>EWMS to be prepared for Construction and operation of concrete wash out areas in accordance with G36 and in consultation with DPI Fisheries. EWMS to be submitted to TfNSW in accordance with G36 Clause 3.2.4 Hold Point.</li> <li>Training including induction and toolbox meetings to train all staff in risks and wet curing.</li> </ul>	ESR	Possible	Moderate	Moderate
Bridge construction	OOH Works for deck pours / finishing	Likely	Minor	Moderate	<ul style="list-style-type: none"> <li>Works to be completed during standard construction hours where possible.</li> <li>Prepared noise screening assessment to determine impacts of overrun prior to works. Where overrun works are predicted to exceed NML outside of standard hours, prepare precautionary NVIS. Noise and vibration impact statement for works in standard construction hours to be prepared to identify receivers at risk high noise impacts. These works will be subject to respite periods as outlined in NSW CoA E37 and NSW CoA E45-E47</li> <li>Community updates will be provided throughout the construction works, when necessary</li> <li>The Noise and Vibration Monitoring Program presented in the CNVMP Appendix B will be implemented throughout the duration of construction activities</li> </ul>	ESR Construction Manager Superintendent	Unlikely	Minor	Low

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
Bridge construction	Works in flood zone	Possible	Major	High	<ul style="list-style-type: none"> <li>In accordance with TfNSW QA Specification G38, TfNSW will run up to three modelling scenarios for the proposed temporary works using its flood model to understand flooding impacts during construction (Seymour Whyte will be responsible for any time and cost associated with any further required modelling). Seymour Whyte will provide TfNSW with a 3D model of the proposed temporary drainage and earthwork extents for TfNSW to run the flood modelling. The modelling must be completed prior to the commencement of any temporary drainage works or earthworks beyond those in the current model (including stockpiling). Seymour Whyte will allow 14 days for each model to be set up and analysed.</li> <li>A Flood Warning and Evacuation Procedures has been prepared under the CFMP. The procedure should be drilled at commencement of works in flood zone.</li> </ul>	Construction Manager	Possible	Moderate	Moderate
Formation works (UZM, SMZ) Import material	Increased traffic movement on local roads	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Designated haul routes will be used, as identified in the Environmental Assessment Documentation, including the M7 Motorway, Elizabeth Drive and The Northern Road for heavy vehicles</li> <li>Traffic Guidance Scheme (TGS) will be prepared and provided to TfNSW under G10 Clause 2.4 hold point.</li> <li>Drivers will be inducted on the haulage roads including the use of The Northern Road and avoidance of other local roads</li> </ul>	Traffic Manager	Unlikely	Minor	Low
Formation works (UZM, SMZ) Import material	Tracking of mud from site on public roads	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Site exit points will be fitted with appropriate controls to limit tracking of material out of site as soon as possible to limit the amount of material transported off site. Controls may include hardstand material; wheel washes; rumble grids; rip rap etc.</li> <li>Street sweepers will be used to manage sediment/mud tracking.</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Possible	Moderate	Moderate
Formation works (UZM, SMZ) Import material	Change in runoff to basins for floccing	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Samples to be taken from basins following commencement of importation of formation aggregates to test flocculant options and dosing rates.</li> </ul>	ESR Soil Conservationist	Likely	Minor	Moderate
Concrete pavement	Generation of dust	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Construction activities with the potential to generate dust will be modified or ceased during high winds to reduce the potential for dust generation</li> <li>Access roads within construction boundary will be maintained and managed to reduce dust generation</li> <li>Stockpiles that have the potential to result in dust generation will be minimised at all times and comply with RMS – <i>Stockpile Site Management Guideline</i> (May 2015) in accordance with SWH4 (Appendix B4 of the OCEMP)</li> <li>During high wind and/or dry conditions, the Construction Contractor will ensure programming of dust generating activities is to be considered in order to reduce nuisance to neighbouring properties</li> </ul>	Supervisor	Possible	Moderate	Moderate



Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Adequate dust suppression will be available and applied where required e.g., watercart, misters</li> </ul>				
Concrete pavement	Bushfire	Likely	Severe	Very High	<ul style="list-style-type: none"> <li>Prepare and implement a WHSMP that incorporate measure to manage and mitigate bushfire risk</li> <li>All site personnel are inducted on bushfire hazards and how they are to be managed</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle.</li> <li>All works involving a fire source will have a hot works permit in place with specific controls to prevent fire risk</li> <li>Smoking (including e-cigarettes) will not be allowed on site except at designated areas. Dedicated butt disposals will be located in all designated smoking areas</li> <li>Cutting, welding or grinding will not be undertaken on total fire ban days, unless the works takes place in an area at least 50 metres away from an ignition source and appropriate fire controls are in place</li> <li>Vehicles will not be driven or idled in areas of long grass on fire ban days or after prolonged periods of dry weather.</li> </ul>	Safe	Rare	Severe	Moderate
Concrete pavement	Erosion and sedimentation impacting nearby dams or downstream watercourses due to exposed land, inadequate controls or control failure	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>ESCPs will be prepared for all work and implemented in advance of site disturbance</li> <li>All site personnel will undergo a site induction and ongoing toolbox talks outlining erosion and sediment control management measures</li> <li>Hardstand areas and surrounding public roads will be cleaned as required, using methods such as street sweepers</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Moderate	Moderate
Concrete pavement	Inappropriate disposal of waste (including contaminated materials) or disposal at an unlicensed waste facility	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>All site personnel working on-site will undergo a site induction that will detail waste and resource management measures</li> <li>Additional targeted toolbox talks will be given on waste disposal from time to time</li> <li>HAZMAT surveys will be undertaken and removal of asbestos will be undertaken prior to demolition activities (if required)</li> <li>Suitably licensed waste contractors will be used for the collection and transport of all waste for either offsite processing and/or disposal to an appropriately licensed facility. Receipts for waste transfer and disposal will be checked to ensure all details are correct and retained for audit purposes.</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Moderate	Moderate
Concrete pavement	Concrete washout	Concrete pavement	Concrete pavement	Concrete pavement	<ul style="list-style-type: none"> <li>EWMS to be prepared for concrete batching works.</li> <li>On site batch plant to be established to provide concrete for pavement with dedicated washout areas.</li> <li>Concrete washout water to be maintained in lined sump pit and rinse water recycled in concrete production.</li> </ul>	Construction Manager, Superintendent,	Unlikely	Minor	Low

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
Concrete pavement	Traffic impacts on local roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Designated haul routes will be used, as identified in the Environmental Assessment Documentation, including the M7 Motorway, Elizabeth Drive and The Northern Road for heavy vehicles</li> <li>Measures identified in the Traffic Control Plan (TCP) (if developed) will be implemented</li> <li>Drivers will be inducted on the haulage roads including the use of The Northern Road and avoidance of other local roads</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low
Concrete pavement	Tracking of mud from site on public roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Site exit points will be fitted with appropriate controls to limit tracking of material out of site as soon as possible to limit the amount of material transported off site. Controls may include hardstand material; wheel washes; rumble grids; rip rap etc.</li> <li>Street sweepers will be used to manage sediment/mud tracking.</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low
Concrete pavement	Noise and vibration impacts to sensitive receivers	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Maximise works during the standard construction hours</li> <li>All construction plant and equipment used on site will be fitted with properly maintained noise suppression devices in accordance with the manufacturer's specifications</li> <li>Erection of temporary acoustic barriers will be completed, where required</li> <li>Community updates will be provided throughout the construction works, when necessary</li> <li>Activities resulting in high noise impacts will be subject to respite periods as outlined in NSW CoA E37 and E45-E47</li> <li>The Noise and Vibration Monitoring Program (Appendix D) will be implemented throughout the duration of construction activities.</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low
Concrete pavement	Impacts on visual amenity i.e. light spill	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Lights will be located as far away as possible and directed away from neighbours/sensitive receivers</li> <li>Boundary screening will be installed in accordance with NSW CoA A21 and A22</li> <li>Boundary screening in the form of chain wire fencing with shade cloth will be installed around the construction boundary in accordance with NSW CoA A21 and A22</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Minor	Low
Concrete pavement	Contamination of soil or water due to a spill or leak from plant/equipment or chemicals	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Hazardous substance handling and use will be conducted away from drainage, stormwater lines and waterways and, wherever possible, within defined bunds</li> <li>Safety Data Sheets will be obtained for dangerous goods and hazardous substances stored onsite before their arrival</li> <li>All site personnel will be responsible for ensuring that refuelling undertaken on site will be undertaken in designated areas only, outside riparian areas and well away from drainage, stormwater inlets or waterways</li> </ul>	Construction Contractor (e.g. Project Manager, Construction Manager, Superintendent, ESR)	Unlikely	Moderate	Moderate



Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Hazardous materials will be stored on drip trays or have secondary containment and be located at least 30m from the dam</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle</li> <li>Any spills or leaks will be immediately contained and absorbed</li> <li>Spill kits will be placed at strategic locations (e.g. access points, plant/ machinery storage areas)</li> </ul>				
Concrete pavement	Missed opportunities to maximise the beneficial re-use of waste such as concrete and asphalt	ESR	Possible	Moderate	<ul style="list-style-type: none"> <li>Resource recovery will be applied to the management of waste and will include the recovery of resources for reuse-reusable materials generated by the construction and will be segregated for reuse on site, or off site, where possible</li> <li>Recovery of recyclable resources generated during construction</li> <li>Recovery of resources for reprocessing, such as the onsite mulching of cleared vegetation for use in landscaping use, in the absence of a higher beneficial use being identified</li> <li>Segregation of resources for recycling for effective processing at recycling facility</li> <li>Prior to the commencement of clearing, a Reuse strategy will be prepared detailing practicable options to reuse native trees or vegetation that are to be removed</li> <li>Where offsite reuse is proposed, the Construction Ecologist is to examine the material as per EPA Mulch Order 2016.</li> </ul>	ESR	Unlikely	Minor	Low
Installation of site facilities	General	Likely	Moderate	High	<ul style="list-style-type: none"> <li>Refer to the Site Establishment Management Plan including Risk Assessment</li> </ul>	ESR	Possible	Moderate	Moderate
Asphalt pavement (Local roads tie in and bridge decks)	Water impacts from hydrocarbons	ESR	Possible	Moderate	<ul style="list-style-type: none"> <li>EWMS to be prepared for managing runoff from the curing process in accordance with G36. EWMS to be submitted to TfNSW in accordance with G36 Clause 3.2.4 Hold Point.</li> <li>Rain forecast checked prior to spraying of chemicals.</li> <li>Stormwater pits to be temporarily blocked off during asphaltting, spill kit present at site.</li> </ul>	ESR	Unlikely	Minor	Low
Site facilities operation	Traffic impacts on local roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Designated haul routes will be used, as identified in the Environmental Assessment Documentation, including the M7 Motorway, Elizabeth Drive and The Northern Road for heavy vehicles</li> <li>Measures identified in the Traffic Control Plan (TCP) (if developed) will be implemented</li> <li>Drivers will be inducted on the haulage roads including the use of The Northern Road and avoidance of other local roads</li> </ul>	Traffic Manager	Unlikely	Minor	Low
	Tracking of mud from site on public roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Site exit points will be fitted with appropriate controls to limit tracking of material out of site as soon as possible to limit the amount of material transported off site. Controls may</li> </ul>	Superintendent ESR	Unlikely	Minor	Low

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					include hardstand material; wheel washes; rumble grids; rip rap etc. <ul style="list-style-type: none"> <li>Street sweepers will be used to manage sediment/mud tracking.</li> </ul>				
	Impacts on visual amenity i.e. light spill	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Lights will be located as far away as possible and directed away from neighbours/sensitive receivers</li> <li>Boundary screening will be installed, where appropriate, in accordance with NSW CoA A21 and A22</li> <li>Light defect audits to be completed following installation of new lighting in accordance the CEMP.</li> </ul>	ESR	Unlikely	Minor	Low
	Noise and vibration impacts to sensitive receivers	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Maximise works during the standard construction hours</li> <li>All construction plant and equipment used on site will be fitted with properly maintained noise suppression devices in accordance with the manufacturer's specifications</li> <li>Erection of temporary acoustic barriers will be completed, where required</li> <li>Community updates will be provided throughout the construction works, when necessary</li> <li>Activities resulting in high noise impacts will be subject to respite periods as outlined in NSW CoA E37 and E45-E47</li> <li>The Noise and Vibration Monitoring Program (CNVMP Appendix D) will be implemented throughout the duration of construction activities</li> </ul>	Construction Manager Superintendent ESR	Unlikely	Minor	Low
	Generation of dust	Unlikely	Moderate	Moderate	<ul style="list-style-type: none"> <li>Access roads will be maintained and managed to reduce dust generation</li> <li>Stockpiles that have the potential to result in dust generation will be minimised at all times and comply with RMS – <i>Stockpile Site Management Guideline</i> (May 2015) in accordance with SWH4 (Appendix B4 of the OCEMP)</li> <li>During high wind and/or dry conditions, the Construction Contractor will ensure programming of dust generating activities is to be considered in order to reduce nuisance to neighbouring properties</li> <li>Adequate dust suppression will be available and applied where required e.g. watercart, misters</li> </ul>	Superintendent ESR	Rare	Moderate	Low
	Contamination of soil or water due to a spill or leak from plant/equipment or chemicals	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Hazardous substance handling and use will be conducted away from drainage, stormwater lines and waterways and, wherever possible, within defined bunds</li> <li>Safety Data Sheets will be obtained for dangerous goods and hazardous substances stored onsite before their arrival</li> <li>All site personnel will be responsible for ensuring that refuelling undertaken on site will be undertaken in designated areas only, outside riparian areas and well away from drainage, stormwater inlets or waterways</li> </ul>	Superintendent	Unlikely	Moderate	Moderate

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
					<ul style="list-style-type: none"> <li>Hazardous materials will be stored on drip trays or have secondary containment and be located at least 30m from the dam.</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle</li> <li>Any spills or leaks will be immediately contained and absorbed</li> </ul> <p>Spill kits will be placed at strategic locations (e.g. access points, plant/ machinery storage areas)</p>				
	Bushfire	Likely	Severe	Very High	<ul style="list-style-type: none"> <li>Prepare and implement a WHSMP that incorporate measure to manage and mitigate bushfire risk</li> <li>All site personnel will be inducted on bushfire hazards and how they are to be managed</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle</li> <li>All works involving a fire source will have a hot works permit in place with specific controls to prevent fire risk.</li> <li>No smoking (including e-cigarettes) will be allowed on site except at designated areas. Dedicated butt disposals will be located in all designated smoking areas.</li> <li>Cutting, welding or grinding will not be undertaken on total fire ban days, unless the works takes place in an area at least 50 metres away from an ignition source and appropriate fire controls are in place</li> <li>Vehicles will not be driven or idled in areas of long grass on fire ban days or after prolonged periods of dry weather.</li> </ul>	Construction Manager Superintendent	Rare	Severe	Moderate
Finishing works and site restoration	Revegetation of disturbed areas	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>A Place, Design and Landscape Plan (PDLP) will be prepared and implemented following the completion of construction</li> </ul>	TfNSW	Unlikely	Minor	Low
	Traffic impacts on local roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Designated haul routes will be used, as identified in the Environmental Assessment Documentation, including the M7 Motorway, Elizabeth Drive and The Northern Road for heavy vehicles</li> <li>Measures identified in the Traffic Control Plan (TCP) (if developed) will be implemented</li> <li>Drivers will be inducted on the haulage roads including the use of The Northern Road and avoidance of other local roads</li> </ul>	Traffic Manager	Unlikely	Minor	Low
	Tracking of mud from site on public roads	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Site exit points will be fitted with appropriate controls to limit tracking of material out of site as soon as possible to limit the amount of material transported off site. Controls may include hardstand material; wheel washes; rumble grids; rip rap etc.</li> <li>Street sweepers will be used to manage sediment/mud tracking.</li> </ul>	Superintendent ESR	Unlikely	Minor	Low

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
	Noise and vibration impacts to sensitive receivers	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Maximise works during the standard construction hours</li> <li>All construction plant and equipment used on site will be fitted with properly maintained noise suppression devices in accordance with the manufacturer's specifications</li> <li>Erection of temporary acoustic barriers will be completed, where required</li> <li>Community updates will be provided throughout the construction works, when necessary</li> <li>Activities resulting in high noise impacts will be subject to respite periods as outlined in NSW CoA E37 and E45-E47</li> <li>The Noise and Vibration Monitoring Program (Appendix D) will be implemented throughout the duration of construction activities</li> <li>In addition to the mitigation measures above, noise and vibration impacts will be managed in accordance with NV1 to NV15 from Appendix B2 of the OCEMP will be implemented.</li> </ul>	Superintendent ESR	Unlikely	Minor	Low
	Erosion and sedimentation impacting nearby dams or downstream watercourses due to exposed land, inadequate controls or control failure	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>Disturbed areas will be rehabilitated as soon as practicable</li> <li>ESCPs will be prepared for all work and implemented</li> <li>All site personnel will undergo a site induction and ongoing toolbox talks outlining erosion and sediment control management measures</li> <li>Hardstand areas and surrounding public roads will be cleaned as required, using methods such as street sweepers</li> </ul>	Superintendent ESR	Unlikely	Moderate	Moderate
	Generation of dust	Unlikely	Moderate	Moderate	<ul style="list-style-type: none"> <li>Access roads will be maintained and managed to reduce dust generation</li> <li>Stockpiles that have the potential to result in dust generation will be minimised at all times and comply with RMS – <i>Stockpile Site Management Guideline</i> (May 2015) in accordance with SW4 (Appendix B4 of the OCEMP)</li> <li>During high wind and/or dry conditions, the Construction Contractor will ensure programming of dust generating activities is to be considered in order to reduce nuisance to neighbouring properties</li> <li>Adequate dust suppression will be available and applied where required e.g. watercart, misters</li> </ul>	Superintendent ESR	Rare	Moderate	Low
	Inappropriate disposal of waste (including, vegetation and contaminated materials) or disposal at an unlicensed waste facility	Possible	Moderate	Moderate	<ul style="list-style-type: none"> <li>All site personnel working on-site will undergo a site induction that will detail waste and resource management measures</li> <li>Additional targeted toolbox talks will be given on waste disposal from time to time</li> <li>Suitably licensed waste contractors will be used for the collection and transport of all waste for either offsite processing and/or disposal to an appropriately licensed facility. Receipts for waste transfer and disposal will be checked to ensure all details are correct and retained for audit purposes.</li> </ul>	ESR	Unlikely	Moderate	Moderate

Activity	Potential impact	Likelihood	Consequence	Risk level prior to mitigation	Mitigation or management measures	Responsibility	Likelihood	Consequence	Risk level following mitigation
	Missed opportunities to maximise the beneficial re-use of waste	Possible	Minor	Moderate	<ul style="list-style-type: none"> <li>Resource recovery will be applied to the management of waste and will include the recovery of resources for reuse-reusable materials generated by the construction and will be segregated for reuse on site, or off site, where possible</li> <li>Recovery of recyclable resources will be generated during construction</li> <li>Recovery of resources for reprocessing, such as onsite mulching of cleared vegetation for use in landscaping use, in the absence of a higher beneficial use identified</li> <li>Segregation of resources for recycling for effective processing at recycling facility</li> <li>Where offsite reuse is proposed, the Construction Ecologist is to examine the material as per <i>EPA Mulch Order 2016</i>.</li> </ul>	ESR Construction Manager	Unlikely	Minor	Low
	Bushfire	Likely	Severe	Very High	<ul style="list-style-type: none"> <li>Prepare and implement a WHSMP that incorporate measure to manage and mitigate bushfire risk</li> <li>All site personnel will be inducted on bushfire hazards and how they are to be managed</li> <li>Hazardous materials will be appropriately banded with a volume of 110 per cent of the largest receptacle</li> <li>All works involving a fire source will have a hot works permit in place with specific controls to prevent fire risk</li> <li>No smoking (including e-cigarettes) will be allowed on site except at designated areas. Dedicated butt disposals will be located in all designated smoking areas</li> <li>Cutting, welding or grinding will not be undertaken on total fire ban days, unless the works takes place in an area at least 50 metres away from an ignition source and appropriate fire controls are in place</li> <li>Vehicles will not be driven or idled in areas of long grass on fire ban days or after prolonged periods of dry weather.</li> </ul>	Construction Manager Superintendent	Rare	Severe	Moderate



# Appendix A3

## Environment and Sustainability Policy

M12 Motorway - Central

January 2025



## M12 Motorway – Central

# Environment and Sustainability Policy

**Transport is a key enabler of economic and social activity. At Seymour Whyte, we are committed to delivering transport which contributes to economic prosperity and social inclusion in an environmentally responsible and sustainable manner, consistent with the Transport for New South Wales – Future Transport Strategy 2056.**

The infrastructure we build will last for generations to come. We have a duty to undertake our activities in the interest of the greater good, moving beyond compliance, and being a genuine leader in environment and sustainability performance.

We will work towards achieving this for NSW by:

- Leadership – contributing to and influencing the strategic environment and sustainability agenda of the NSW Government
- Environmental protection – being accountable for addressing and minimising the environmental impacts of our activities to satisfy the expectations and legislative requirements of the NSW Government and community
- Energy and carbon – improving energy efficiency and working towards net zero carbon emissions
- Resilience – embedding climate risk and resilience considerations in our activities
- Sustainable procurement – procuring and delivering sustainable, efficient and cost-effective transport options, including responsible supply chains
- Whole of life – considering whole of life benefits and impacts from our activities across all life cycle stages - demand/need, plan, acquire, operate/maintain and disposal
- Social – recognising the social impacts and benefits of our activities, and working for healthy liveable communities
- Awareness – raising the awareness and capacity of our workforce to be accountable for implementing the Policy through their activities to achieve enhanced environmental outcomes and a culture of environmental responsibility
- Communication – communicating openly, responsively and empathetically with our customers, partners and stakeholders on environmental matters and report on our performance.

This Policy applies to all employees, and third parties engaged by Seymour Whyte.

A black rectangular box redacting the signature of the Project Director.

Project Director, M12 Motorway – Central

A handwritten signature in blue ink, likely belonging to the Project Director.



# Appendix A4

## Ancillary Facility Assessment Criteria

M12 Motorway – Central





January 2025

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## Document control

<b>File Name</b>	M12 Central CEMP Appendix A4
<b>Title</b>	M12 Central CEMP: Appendix A4 Ancillary Facilities Assessment Criteria
<b>Document Number (Teambinder)</b>	M12CCO-SYW-ALL-EN-PLN-000003

## Approval and authorisation

Plan reviewed by:	Plan endorsed by:
	
Seymour Whyte Environmental Site Representative	Seymour Whyte Project Manager
18/01/2025	18/01/2025
	

## Revision history

Revision	Date	Description
A	18/02/2022	First draft for TfNSW review
B	29/04/2022	Update to respond to TfNSW comments
C	20/06/2022	Update to respond to TfNSW comments
D	27/07/2022	Update to respond to TfNSW comments
E	17/08/2023	Updated in response to OCEMP update
F	18/01/2025	Updated in response to OCEMP update

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## Glossary/ Abbreviations

Abbreviations	Expanded text
ARI	Average Recurrence Interval
CEMP	Construction Environmental Management Plan
CFFMP	Construction Flora and Fauna Management Sub-plan
CoA	Conditions of Approval
CSSI	Critical State Significant Infrastructure
DECC	Former NSW Department of Environment and Climate Change
DPE	NSW Department of Planning and Environment
DPHI	NSW Department of Planning, Housing and Infrastructure (formerly NSW DPE which has now been split into NSW DCCEEW and NSW DPHI, with all planning functions falling to DPHI)
EIS	Environmental Impact Statement



<p>Environmental Assessment Documentation</p>	<p>[TA1][BT2]</p> <p>The set of documents that comprise the Division 5.2 Approval:</p> <ul style="list-style-type: none"> <li>• Roads and Maritime Services (October, 2019) M12 Motorway, Environmental Impact Statement (EIS)</li> <li>• Transport for NSW (October, 2020) M12 Motorway, Submissions Report (the Submissions Report)</li> <li>• Transport for NSW (October, 2020) M12 Motorway, Amendment Report (AR)</li> <li>• Transport for NSW (December, 2020) M12 Motorway, Amendment Report submissions report (ARSR)</li> <li>• Transport for NSW (March, 2021) The M12 Motorway Amendment Report Submissions Report – Amendment (ARSR amendment)</li> <li>• WSP (October, 2021) M12 Motorway – West Package Detailed Design Consistency Assessment</li> <li>• GHD (October, 2021) M12 Motorway – Central Package Detailed Design Consistency Assessment</li> <li>• Arcadis (June, 2022) M12 Motorway – Sydney Water Crossings Consistency Assessment</li> <li>• Arcadis (July, 2022) M12 Motorway – Design Boundary Changes Consistency Assessment</li> <li>• Arcadis (August, 2022) M12 Motorway Minor Consistency Assessment for Proposed Change to the M12 Motorway Project (M12 Central)</li> <li>• Arcadis (September, 2023) M12 Motorway – Devonshire Road Temporary Roundabout Consistency Assessment</li> <li>• WSP (September, 2023) M12 Motorway – Elizabeth Drive Connections Consistency Assessment</li> <li>• TfNSW (September, 2023) M12 Motorway – Minor Consistency Assessment M12 West demolition of structures as 752 Luddenham Road</li> <li>• TfNSW (October, 2023) M12 Motorway – Minor Consistency Assessment M12 East AF9 Power Supply</li> <li>• TfNSW (October, 2023) M12 Motorway – Minor Consistency Assessment M12 East Cecil Road Laydown Area</li> <li>• TfNSW (October, 2023) M12 Motorway – Minor Consistency Assessment M12 East Temporary Construction Signage</li> <li>• Arcadis (December, 2023) M12 Motorway – East Site 48, 50 and 51 Boundary Changes Minor Consistency Assessment</li> <li>• Arcadis (January, 2024) M12 Motorway – Minor Consistency Assessment M12 Central Water Tower Access Road</li> </ul> <p>The documents that comprise the EPBC referral:</p> <ul style="list-style-type: none"> <li>• Submission #3486 – The M12 Motorway Project between the M7 Motorway, Cecil Hills and The Northern Road, Luddenham, NSW</li> </ul>
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Abbreviations	Expanded text
	<ul style="list-style-type: none"> <li>Notification[TA3][BT4] of referral decision and designated proponent - controlled action; date of decision 19 October 2018; ID: 2018-8286.</li> </ul>
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPL	Environment Protection Licence
ER	Environmental Representative
ICNG	Interim Construction Noise Guideline
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water (formerly NSW DPE which has now been split into NSW DCCEEW and NSW DPHI)
OCEMP	Overarching Construction Environmental Management Plan
OCS	Overarching Communications Strategy
PDLP	Place, Design and Landscape Plan
PLO	Public Liaison Officer
Primary CoA/ REMM	CoA/REMM that are specific to the development of this Plan
Secondary CoA/ REMM	CoA/REMM that are related to, but not specific to, the development of this Plan
SEMP	Site Establishment Management Plan
TEC	Threatened Ecological Communities
TfNSW	Transport for New South Wales

# 1 Introduction

Ancillary facilities are required to support construction of the M12 Central package. Two types of ancillary facility are defined in the NSW Infrastructure Approval:

- Minor Construction Ancillary Facility: Lunch sheds, office sheds, portable toilet facilities, and the like that meet the requirements of NSW CoA A20
- Construction Ancillary Facility: A temporary facility for construction of the CSSI including an office and amenities compound, construction compound, material crushing and screening plant, materials storage compound, maintenance workshop, testing laboratory, material stockpile area access and car parking facilities and utility connections to the facility. Where an approved CEMP contains a stockpile management protocol, a material stockpile area located within the construction footprint is not considered to be a Construction ancillary facility.

As a stockpile management protocol is included as part of the CEMP, material stockpile areas are not included in the definition of Construction Ancillary Facilities for the Project.

The Environmental Assessment Documentation for the Project identified a number of compounds and construction ancillary facilities that will be required for the construction of the Project, including locations for hardstand areas, temporary building and offices, parking areas, material laydown and storage areas. A description of the ancillary facilities assessed in the Environmental Assessment Documentation is provided in Section 2.1 and their location shown in Annexure A. Section 2.1 outlines the key features of the assessed ancillary facilities.

Section 2.2 provides the Construction Ancillary Facilities assessment criteria to be adopted where Seymour Whyte propose to use ancillary facilities that are not identified by description and location in the Environmental Assessment Documentation including the requirements for the preparation of the Site Establishment Management Plan (SEMP) in accordance with NSW CoA A16. It is noted that the SEMP is required for the establishment of a Construction Ancillary Facility (excluding minor construction ancillary facilities), whether previously assessed, or additional to those identified in the Environmental Assessment Documentation.

The purpose of this document is to summarise the requirements for ancillary facility establishment in accordance with NSW CoA A15 to A23. The size of the ancillary facilities are subject to lease arrangements with landowners and could be reduced in size.

## 2 Construction ancillary facility assessment criteria

### 2.1 Approved construction ancillary facilities

Table 2-1 provides a summary of key details of the construction ancillary facilities assessed in the Environmental Assessment Documentation or meet criteria outlined in NSW CoA A15. Those that are not applicable to the M12 Central package are greyed out, but provided for completeness.

The location of these facilities is shown in Annexure A.

Table 2-1: Construction ancillary facilities locations and purposes

AF	Location	Approximate size (ha)	Purpose
AF4	West of Clifton Avenue, north of proposed main line	3.0	<del>Concrete/asphalt batching plant</del> , plant servicing workshop, stockpile and laydown area, secondary offices, amenities, vehicular access, car park
AF5	West of Mamre Road North of Elizabeth Drive	4.1	Plant servicing workshop, stockpile and laydown area, secondary offices, vehicular access, car park
AF6	South of Elizabeth Drive opposite Duff Road	1.9	Plant servicing workshop, stockpile and laydown area, secondary offices, vehicular access, car park
AF12	West of Clifton Avenue	1.7	Stockpile and laydown area, amenities, vehicular access, car park, Concrete/ asphalt batching plant (AF12a)
AF12b	West of Clifton Avenue	2.6	
AF13	East of Salisbury Avenue	4.1	Stockpile and laydown area, secondary offices, amenities, vehicular access, car park
AF15	South of the intersection of Elizabeth Drive and Mamre Road	2.08	Stockpile and laydown area, secondary offices, amenities, vehicular access, car park
AF16	Within the carpark of the existing Wylde Mountain Bike Trail	1.0	Stockpile and laydown area, secondary offices, amenities, vehicular access, car park
AF16a	Within the project alignment, approx. 60m south of AF16	0.27	Crushing

The impacts of the construction ancillary facilities were assessed in the Environmental Assessment Documentation in accordance with criteria for ancillary facility location set out in the Critical State Significant Infrastructure (CSSI) Standard Conditions of Approval (CoA) for linear infrastructure projects (refer DPE website). A summary of the assessment of the construction ancillary facilities against the criteria is provided in Annexure B.

Establishment and operation of the construction ancillary facilities will result in a range of potential environmental impacts, including those identified in Table 2-2.

Table 2-2: Potential environmental impacts

Environmental aspect	Potential impacts
Flora and fauna	Vegetation clearing Disturbance or mortality of fauna during clearing works Habitat loss, degradation, or fragmentation
Traffic	Traffic impacts associated with spoil and material haulage including potential conflicts with local traffic and increased congestion
Erosion and sedimentation	Mobilisation of sediment laden/contaminated runoff entering waterways and drainage lines
Noise and vibration	Noise and vibration disturbance to neighbouring sensitive receivers during compound/ancillary facility establishment and operation Noise disturbance to sensitive receivers due to out of hours work Noise generated by operation of facility and construction traffic accessing facilities
Air quality	Generation of dust emissions and odours from stockpiles, access roads and transport of materials and from earthworks and clearing during facility establishment
Heritage	Impact to undiscovered or undocumented heritage sites
Storage of hazardous substances	Accidental spills and leaks, resulting in pollution of waterways and soils
Waste and recycling	Generation of waste by site personnel using offices and staff amenities Generation of waste during establishment of ancillary facilities disposed of incorrectly, e.g. recyclable materials being sent to landfill
Visual amenity	Potential for site hoardings or other exposed surfaces to be vandalised Potential for site lighting to affect the amenity of surrounding land uses Potential for waste to not be placed in appropriate bins and result in litter around the construction worksites

Environmental aspect	Potential impacts
Contaminated land	Potential for encountering previously undocumented contaminated material
Socio-economic	Direct land use impacts associated with the location of construction compounds, temporarily disrupting use and access to land including rural or vacant land, residential and commercial uses

## 2.2 New or amended construction ancillary facilities assessment

Where Seymour Whyte propose to use construction ancillary facilities, including stockpiles located outside of the construction footprint, that are not identified by description and location in the Environmental Assessment Documentation (as listed in Table 2-1), they must be assessed against, and meet the criteria listed in Table 2-3 unless otherwise approved by the Planning Secretary, in accordance with NSW CoA A15.

Seymour Whyte will document the outcomes of the assessment in a report to be included in the SEMP, in accordance with NSW CoA A16, which will include:

- Details on the site location and access arrangements
- A description of the activities to be undertaken including the hours of use and storage of dangerous goods
- Outcomes of the assessment of the site against the locational criteria set out in Table 2-3
- An assessment of the environmental impacts on the site and the surrounding environment, including, but not limited to noise, vibration, air quality, traffic and access during site establishment and operation, flora and fauna, heritage, erosion and sedimentation, water quality and light spill
- Details of the mitigation, monitoring and management procedures specific to the construction ancillary facility that will be implemented to minimise environmental impacts
- Demonstrated overall consistency with the approved Project (including impacts identified in the Environmental Assessment Documentation).

The assessment report will be endorsed by the ER and provided to the Planning Secretary, as part of the SEMP, at least one month before the establishment of the facility.

Where any alternative sites are located outside the Project construction footprint, further environmental assessment will be required.

Table 2-3: Construction ancillary facilities criteria in accordance with NSW CoA A15

Requirement	Criteria
A15(a)	They are located within or immediately adjacent to the construction boundary
A15(b)	They are not located next to a sensitive receiver(s) (including where an access road is between the facility and the receiver(s)), unless the sensitive receiver(s) (both the landowner(s) and occupier(s)) have given written acceptance to the carrying out of the relevant facility in the proposed location; and

Requirement	Criteria
A15(c)	they have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and
A15(d)	The establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.

## 2.3 Site Establishment Management Plan

A SEMP will be developed in accordance with NSW CoA's related to the SEMP and associated construction ancillary facilities [as [TA5][BT6]detailed in Annexure D.

In accordance with NSW CoA A16, prior to establishment of any Construction Ancillary Facility (other than minor construction ancillary facilities), Seymour Whyte will prepare a SEMP. The SEMP will detail the management of the construction ancillary facilities and include:

- A description of activities to be undertaken during establishment of the construction ancillary facility (including scheduling and duration of work to be undertaken at the site)
- Figures illustrating the proposed site layout and the location of the closest sensitive receiver(s)
- A program for ongoing analysis of the key environmental risks arising from the construction activities, including an initial risk assessment undertaken prior to the commencement of site establishment work
- Details of how the site establishment activities will be carried out to:
  - Meet the performance outcomes stated in the Environmental Assessment Documentation
  - Manage the risks identified in the initial risk assessment undertaken and included within the SEMP

The SEMP will be endorsed by the ER and submitted to the Planning Secretary for approval no less than one (1) month before the establishment of the ancillary facilities.

As required by NSW CoA A17, a new or revised SEMP must be prepared for any amended construction ancillary facilities if, upon the completion of Early Works, additional activities are required to establish a construction ancillary facility or there is a change to the site layout of a construction ancillary facility, in order to support construction of the M12 Central package.

The use of a construction ancillary facility for construction (excluding minor construction ancillary facilities described in Section 3) must not commence until the OCEMP and Sub-plans required by have been approved by the Planning Secretary.

### 2.3.1 Consultation

The SEMPs will be developed in consultation with relevant government agencies and local Councils (Liverpool City Council, Penrith City Council and Fairfield City Council as appropriate) in accordance with NSW CoA A16.



In accordance with NSW CoA A4 and A5, evidence of consultation during the preparation of the SEMP will be appended to the SEMP and submitted to the Planning Secretary. The information documented will include details of the consultation activities undertaken, a register of completed or attempted engagement with relevant stakeholders, issues raised and addressed, follow-up actions, any outstanding or unresolved issues and reasons why they remain to be addressed. Seymour Whyte will carry out ongoing consultation with the relevant Council regarding issues relevant to construction ancillary facilities throughout construction of the M12 Central package.

### 2.3.2 Pre-construction land condition assessments

A pre-construction land condition assessment will be arranged by the Seymour Whyte prior to possession of any area of land nominated by TfNSW for the location of site facilities, including areas for construction materials storage and stockpiling in accordance with the requirements of TfNSW QA Specification G36.

The pre-construction land condition assessment:

- Will be undertaken by an independent environmental consultant approved by TfNSW, with experience in site environmental inspections and construction waste management
- Will identify any existing waste or stored materials on the land prior to the area being occupied.
- Will be undertaken for any areas, additional to those nominated, that have been authorised by TfNSW and the necessary statutory and environmental planning approvals for the intended use of the land will be obtained
- Report will include text, photographs and maps to describe any existing waste or stored materials on the site. The report will be prepared in accordance with TfNSW Environmental Procedure [“Management of Wastes on Roads and Maritime Services Land”](#) (refer to Annexure C)
- Report will be submitted to the TfNSW Environment and Sustainability Manager (or delegate) for approval, prior to establishment of the ancillary facility.

The TfNSW Environment and Sustainability Manager (or delegate) may undertake an inspection of the ancillary facility site prior to commencement of establishment activities.

### 2.3.3 Post-construction restoration and land condition assessment

At the completion of the M12 Central package, Seymour Whyte will decommission the ancillary facilities and any disturbed land rehabilitated and landscaped to a minimum standard of its pre-construction condition in accordance with TfNSW QA specification G36. Any disturbed areas (including areas for site compounds, material storage, access and haul roads and project accommodation) will be restored to a condition similar to that existing before disturbance, unless otherwise authorised by TfNSW.

Restoration will include spill clean-up and soil remediation where applicable, topsoiling of the area, weed control and seeding, planting, watering and maintenance, removal of temporary erosion control devices and sediment in drainage lines plus removal of unused construction materials.

Areas disturbed as a result of construction will be progressively rehabilitated as soon as practicable.

The work site will be left tidy and free of rubbish upon completion of construction.

Following restoration of the land by Seymour Whyte, a post-construction land condition assessment will be conducted by an independent environmental consultant approved by TfNSW. The report will be prepared in accordance with TfNSW Environmental Procedure [“Management of Wastes on Roads and Maritime Services Land”](#) (refer Annexure C). The post-construction land condition assessment will confirm that no unauthorised waste remains on the site. The post-construction land condition assessment report will be submitted to the TfNSW Environment and Sustainability Manager (or delegate).

If required by the post-construction land condition assessment report, Seymour Whyte will undertake additional restoration works to ensure all waste is removed and the site returned to pre-construction condition.

The TfNSW Environment and Sustainability Manager (or delegate) may carry out an inspection of the ancillary facility site, before approving that it has been restored.

### **2.3.4 Boundary fencing**

In accordance with NSW CoA A21, Seymour Whyte will erect boundary fencing around all construction ancillary facilities that are adjacent to sensitive receivers for the duration of construction, unless otherwise agreed with the affected residents, business operators and landowners. The boundary fencing will minimise, as far as practicable, visual impacts on adjacent sensitive receivers, as required by NSW CoA A22.

In accordance with NSW CoA A23, the CSSI name, application number, telephone number, postal address and email address must be made available on site boundary fencing at the entrance of each ancillary facility before the commencement of construction.

### **2.3.5 Visual and lighting impacts**

In accordance with NSW CoA E61 and E62, visual impacts and light spillage of the construction ancillary facilities will be minimised. Seymour Whyte will provide temporary landscaping and vegetative screening of the construction ancillary facilities and incorporate architectural treatment and finishes within temporary structures that reflect the context of the environment surrounding the construction ancillary facility.

All lighting associated with the construction of the M12 Central package will be consistent with the requirements of *AS 4282-2019 Control of the obtrusive effects of outdoor lighting* and relevant *AS/NZ 1158 – Lighting for Roads and Public Spaces*, and the *National Airports Safeguarding Framework (NASF) Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports*.

Temporary and permanent lighting will be designed and implemented with consideration of:

- The need to orientate lighting to minimise light spill and glare impacts on nearby receivers
- The need to minimise vandalism and maintenance requirements
- Requirements of the National Airports Safeguarding Framework (NASF) (National Airports Safeguarding Advisory Group, n.d.) for operational lighting
- Opportunities to implement sustainability initiatives in design such as energy efficient or solar lighting.

Additionally, mitigation measures will be implemented by Seymour Whyte to manage residual night lighting impacts to protect properties adjacent to the Project, in consultation with affected landowners, such as:

- Installing lighting equipment in work areas will be with a view to minimised disturbance to local residents
- Using deflection screens or fixtures on lights if required
- Only lighting the works areas required to be lit
- Lights should be kept low in intensity and close to the ground where possible
- Installing operational lighting infrastructure in accordance with the relevant TfNSW design drawings and standards
- Directing lighting away from vegetated areas where practicable and selecting lights with little or no blue in them (such as orange, red or amber coloured lights) which reduces skyglow and to which wildlife are generally less sensitive.

The M12 Central package Sustainability Management Plan includes a process for monitoring compliance with the requirements for managing light spill including a program of inspections during construction following establishment of site compounds, first time use of temporary night lighting in a new location and in response to light spill complaints.

### **2.3.6 Property access**

In accordance with NSW CoA E83, Seymour Whyte will reinstate any property access that has been affected by the construction of the M12 Central package to at least an equivalent standard or alternative access will be provided in consultation with the landowner.

### 3 Minor construction ancillary facilities assessment criteria

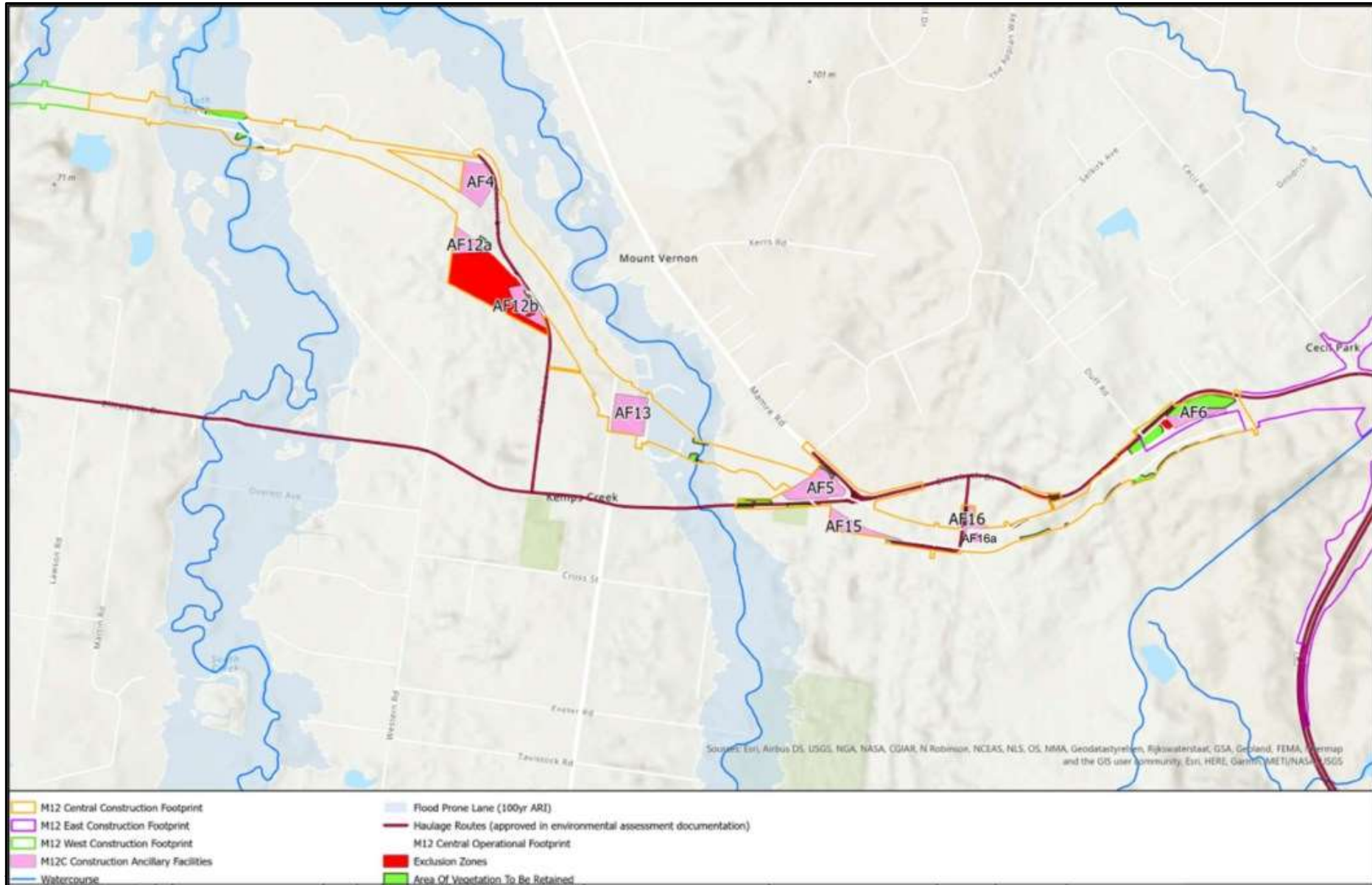
Minor construction ancillary facilities include offices, sheds and staff amenities and can be established and operated within and adjacent to the construction boundary with Environmental Representative (ER) approval in accordance with NSW CoA A20.

Minor construction ancillary facilities assessed in the Environmental Assessment Documentation don't require approval from the ER. For minor construction ancillary facilities not included in the Environmental Assessment Documentation, the ESR will prepare an assessment against the minor ancillary facilities assessment criteria in accordance with NSW CoA 20 to be presented to the ER for approval. The criteria is outlined below:

- No greater environmental and amenity impacts than those that can be managed through the implementation of environmental measures detailed in the OCEMP and CEMP
- Minor amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (ICNG), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts
- Minimal environmental impact with respect to waste management, soil, water and flooding
- No impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of the Infrastructure Approval.



## Annexure A - Location of ancillary facilities



## Annexure B - EIS and Amendment Report assessment of construction ancillary facility locations

The construction ancillary facilities identified in the EIS and Amendment Report were assessed in accordance with the Critical SSI Standard Conditions of Approval for linear infrastructure projects.

These standard conditions have been developed to help infrastructure providers understand the types of conditions likely to be applied to State significant projects if they are approved, including conditions related to construction ancillary facilities.

As discussed in the EIS, when locating construction ancillary facilities, the following criteria should generally be applied:

- (a) Located more than 50 m from a waterway unless an erosion and sediment control plan is prepared and implemented so as not to affect water quality in the waterway in accordance with Managing Urban Stormwater series
- (b) Within or adjacent to land where the critical state significant infrastructure is being carried out
- (c) With ready access to a road network
- (d) So as to avoid the need for heavy vehicles to travel on local streets or through residential areas in order to access the facility
- (e) On level land
- (f) So as to be in accordance with the *Interim Construction Noise Guidelines* (DECC, 2009) by 200 metres of the nearest residences (300 metres for a temporary batching plant)
- (g) So as not to require vegetation clearing beyond the extent of clearing for the Project area
- (h) So as not to have any impact on heritage items (including areas of archaeological sensitivity) beyond the impacts identified, assessed and approved under other terms of this approval
- (i) So as not to affect lawful uses of adjacent properties that are being carried out at the date upon which construction or establishment of the facility is to commence
- (j) To enable operation of the ancillary facility during flood events referred to in Section 7.8 of the EIS and Appendix H of the Amendment Report and to avoid or minimise, to the greatest extent practicable, adverse flood impacts on the surrounding environment and other properties and infrastructure
- (k) So as to have sufficient area for the storage of raw materials to minimise, to the greatest extent practicable, the number of deliveries required outside standard construction hours.

The results of the assessment of each proposed construction ancillary facility against the criteria above is summarised in Table B-1.



Table B-1: Construction ancillary facility assessment

Compound location	Construction ancillary facility site locations criteria (as detailed in Appendix B)									
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
AF1	N	Y	Y	Y Access via The Northern Road with some residence adjacent	Y	N	Y	Y	Y	Y
AF2	Y	Y	Y	Y Noting there are some residences located adjacent to Elizabeth Drive	Y	N	Y	N McGarvie-Smith Farm impacted	Y	Y
AF3	Y	Y	N Access via AF2 or via construction footprint	Y Noting there are some residences located adjacent to Elizabeth Drive	Y	Y	Y	N McMaster Field Station impacted	Y	Y
AF4	Y	Y	Y	N Access via Clifton Avenue	Y	Y	N Contains about 0.4 ha of Hard leaved Scribbly Gum - Parramatta Red Gum	Y	Y	Y

Compound location	Construction ancillary facility site locations criteria (as detailed in Appendix B)									
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
							heathy woodland of the Cumberland Plain, Sydney Basin Bioregion			
AF5	N	Y	Y	N Access via Mamre Road and Elizabeth Drive	Y	N	Y	Y	Y	N Small sections of the site are withing 2-year ARI (5 per cent AEP) flood extent
AF6	Y	Y	Y	Y Access via Elizabeth Drive passes some residences	Y	N	N Contains about 0.14 ha amounts of Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	Y	Y	Y
AF7	Y	Y	N Access via AF6 or via	Y Access via Elizabeth Drive passes	N	Y	N Contains about 0.2 ha of Grey Box -	Y	Y	Y

Compound location	Construction ancillary facility site locations criteria (as detailed in Appendix B)									
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
			construction footprint	some residences			Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion and 0.12 ha of 'Revegetation'			
AF8	Y	Y	N Access via AF6 or via construction footprint	Y	N	Y	Y	Y	Y	Y
AF9	Y	Y	Y	Y	Y	N	N	Y Aboriginal heritage exclusion zone located within this AF	Y	N
AF10	Y	N Currently established AF for The Northern Road upgrade project; located along The Northern	Y	Y	Y	N	Y	Y	Y	N

Compound location	Construction ancillary facility site locations criteria (as detailed in Appendix B)									
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
		Road at Luddenham								
AF11	Y	Y	Y	Y	Y	N	N	N	Y	Y
AF12	Y	Y	Y	Y	Y	N	Y Biodiversity exclusion zone located within this AF	Y	Y	Y
AF13	Y	Y	Y	Y	Y	N	Y TEC located within this AF	Y	Y	Y
AF14	Y	Y	Y	Y	Y	N	N	Y	Y	Y
AF15	Y	Y	N Access via construction footprint	Y	Y	Y	N	Y	Y	Y
AF16	Y	Y	Y	Y	Y	Y	N	Y	Y	Y
										[TA7]
AF17	Y	Y	Y	Y	Y	N	N	Y Aboriginal heritage exclusion zone located within AF	Y	N
AF18	Y	Y	Y	Y	Y	Y	N Threatened species	Y	Y	N

Compound location	Construction ancillary facility site locations criteria (as detailed in Appendix B)									
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
							located within this AF			

## SEMP assessment of construction ancillary facility locations

Assessments for two further ancillary facilities have been conducted:

- AF16a (M12 Central) - the assessment for AF16a applied the criteria CoA A15, as detailed in the M12 Central Site Establishment Management Plan.<sup>[TA8]</sup>



## **Annexure C – Pre-construction land condition assessment report procedure**



**Transport**  
Roads & Maritime  
Services

# ENVIRONMENTAL PROCEDURE

## MANAGEMENT OF WASTES ON ROADS AND MARITIME SERVICES LAND

**August 2014**





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# 1. Introduction

The construction of road projects often requires contractors to occupy land in Roads and Maritime Services (RMS) owned or leased land for ancillary construction activities such as the temporary stockpiling of soils, concrete batching and locating of site sheds. RMS land adjacent to road corridors may also be used to construct permanent structures such as visual and noise mounds.

This document contains RMS' procedures for:

- Using RMS owned or leased land sites for ancillary road construction purposes and
- Permanently locating wastes onto RMS owned or leased sites for the creation of permanent structures such as noise and visual mounds.

For the purposes of this procedure, an RMS land site is defined as land that is either:

- Residual to RMS road proposals
- Land that may be required for future infrastructure proposals
- Land that RMS has leased for ancillary construction or maintenance purposes.

## 1.1. Purpose

The purpose of this document is to set out the RMS approval and waste management procedures for utilising RMS land sites for road construction activities.

This procedure has been developed to minimise the risks of unauthorised waste materials remaining on RMS land after the completion of road construction activities.

The procedure details:

- Environmental planning and internal RMS approval processes.
- Pre-construction land condition assessments.
- Post-construction land condition assessments and site hand back processes.

A summary flowchart outlining the key steps in this procedure is shown in Figure 1.

## 1.2. Scope

This procedure applies to all RMS land sites outside the road corridor that are used for temporary ancillary construction activities or for permanently placing materials on these sites for beneficial re-use. The procedure applies to RMS and its construction and maintenance contractors.

Temporary ancillary construction activities include but are not limited to:

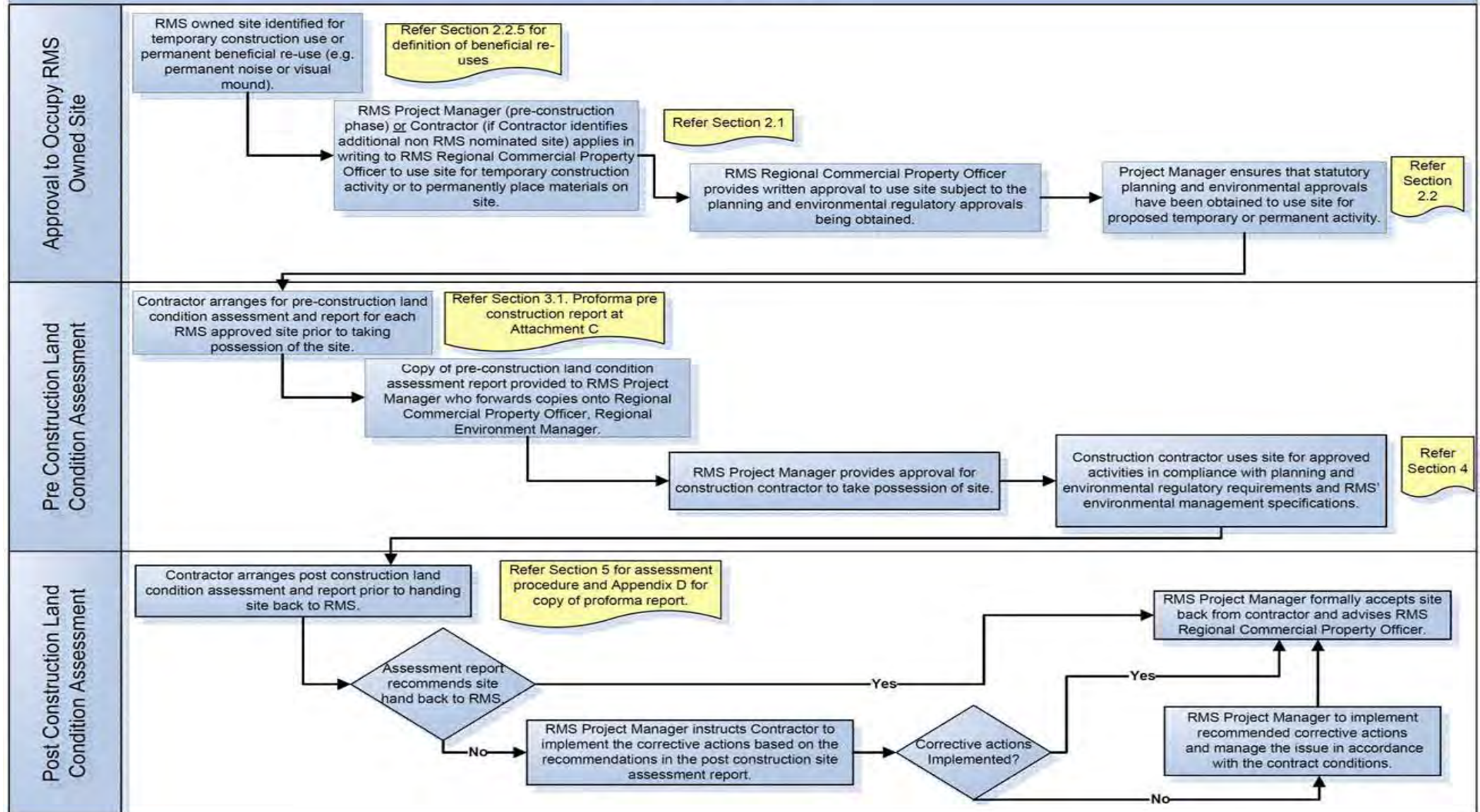
- Soil and rock stockpiling
- Storage of construction materials
- Locating site sheds, storage sheds and maintenance yards
- Concrete crushing
- Temporary concrete or asphalt batching plants
- Location of temporary sediment basins
- Vegetation storage
- Construction staging areas (e.g. assembling bridge structures)

Permanent beneficial re-uses include:

- Noise mounds
- Visual mounds
- Engineered fill
- Flood relief mounds

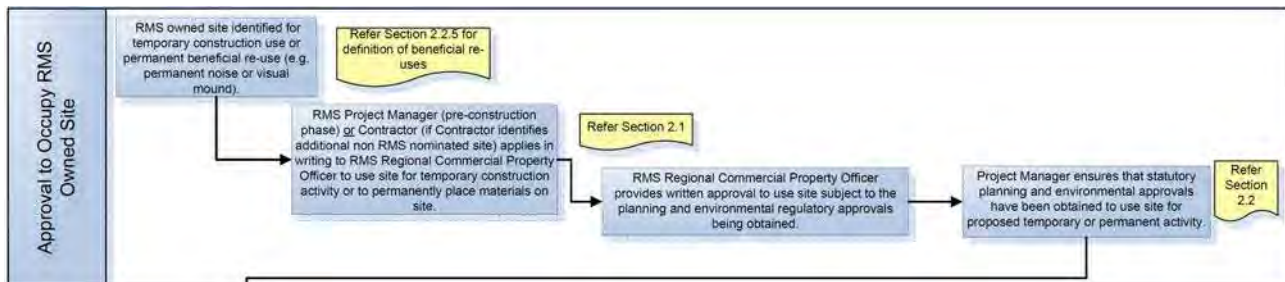
Figure 1: Environmental Procedure - Management of Wastes on RMS Land

Summary Flow Chart



## 2. Obtaining Approval to Use RMS Land Sites

### Summary of Approvals Process



### 2.1 Internal RMS Approval to Occupy Sites

Each RMS regional office has a regional property team, with some teams having a Commercial Property Officer. For the purposes of this procedure, it is assumed, subject to any clarification of organisational roles, that Commercial Property Officers are responsible for providing approval for the use of RMS sites for construction purposes.

RMS' Project Managers are required to obtain the prior approval of the relevant regional property team prior to nominating any RMS sites for use by the contractor.

In some cases, construction contractors may request the use of additional RMS land not nominated by the RMS Project Manager for temporary or permanent construction use. In these cases, it will be the responsibility of the contractor to seek all RMS and statutory approvals (such as planning approvals) for the use of these sites.

Project Managers or contractors should seek approval via email specifying:

- The site location (Lot and DP)
- Portion of the site required
- Intended use of the site
- Type and estimated quantities of any wastes or materials to be placed on site
- Period of time the site will be required

RMS Regional Commercial Property Officers are to provide written approval for the temporary or permanent use of the site and include any approval conditions. Examples of approval conditions include:

- Requiring that all necessary statutory environmental and planning approvals are obtained to use the proposed site for the proposed construction activities (see Section 2.2).
- Any post construction requirements, such as post construction engineered fill compaction requirements to prepare the site for future land use (such as residential building).

The RMS Project Manager is to ensure that the Contractor is made aware of the approval conditions provided by RMS Commercial Property Officers throughout the contract.

Prior to a contractor taking possession of the site, the contractor is to arrange for a pre-construction land condition assessment to be undertaken as per [Section 3](#) of this procedure.

**Important Note:** RMS should not make any sites available to a contractor where the site is known or suspected to be contaminated by previous land uses and that contamination poses a known risk to human health and/or the environment. The environmental assessment for the road project should have identified any known or potential contaminated sites.

## 2.2 Statutory Approvals

This section provides a summary of key statutory environment and planning obligations that relate to waste management and the temporary or permanent use of sites. Detailed advice on environment and planning compliance requirements can be obtained from RMS Environment Branch or RMS Legal Branch.

### 2.2.1 Environmental Planning and Assessment Act, 1979 (EP&A Act)

RMS has a statutory responsibility under the EP&A Act to consider the impacts of its activities on the environment. This extends to the use of sites for any temporary or permanent road construction related use.

RMS fulfils its statutory planning responsibility through the environmental impact assessment (EIA) process. The likely environmental impacts of a proposed activity are assessed to inform the decision to proceed.

**Key Approval Requirements:** All RMS land sites proposed for temporary or permanent road construction activities must be assessed and approved for use under the EP&A Act prior to the commencement of any proposed activities.

The proposed activities and specific sites to be used must be described and assessed in the project environmental assessment report, Environmental Impact Assessment (EIS) or Review of Environmental Factors (REF). If the proposed site and activities are not described in the original project EIS or REF then a supplementary assessment must be undertaken and approval obtained. RMS Environment Branch can advise on the correct planning approval pathway to take and the level of documentation required.

Where planning approval has been issued by the Department of Planning it is important to comply with all conditions attached to the approval including those related to the temporary storage of materials or construction and operation of ancillary facilities.

A Best Practice Note for addressing waste contingency planning in environmental assessment documents is provided at [Section 2.2.5](#) of this procedure. The practice note aims to cover the range of possible waste activities that may occur during the construction phase so as to reduce the need to obtain supplementary approvals during the construction stage.

### 2.2.2 Protection of the Environment Operations Act 1997 (POEO Act)

The Protection of the Environment Operations Act:

- Specifies requirements for licences and the regulation of various activities that have the potential to pollute or harm the environment.
- Integrates EPA licensing with the development approval procedures under the Environmental Planning and Assessment Act 1979.
- Provides for the issuing of clean-up notices, prevention notices and environment protection notices.
- Classifies environment protection offences and penalties.
- Allows for mandatory audits and provides authorised officers' with the power to undertake investigations.

**Key Compliance Requirements:** Refer to Attachment A to determine if the proposed waste activity at the site requires an Environment Protection Licence (EPL) noting that the proposed activity may already be covered by an existing EPL for the road construction project. If this is the case, an additional EPL may not be required.



### 2.2.3 Protection of the Environment Operations (Waste) Regulation 2005

This Regulation sets out the provisions related to the storage and transportation of waste as well as reporting and record keeping requirements for waste facilities. It also provides for:

- Setting special requirements for the management of certain special wastes including asbestos.
- Payment of waste contributions (also referred to as a waste and environment levy) by the occupiers of licensed waste facilities for each tonne of waste received at the facility or generated in a particular area.
- Exemption of certain occupiers or types of waste from paying waste contributions and from requiring an Environment Protection Licence.

**Key Compliance Requirements:** RMS and its contractors must comply with the waste tracking and reporting requirements that apply to wastes. The regulation also specifies the waste and environment levy fees that apply to the disposal of wastes at licensed waste facilities.

“Resource recovery exemptions” for certain road related wastes are issued by the EPA under this regulation where it can be shown that the wastes are being beneficially re-used. Beneficial re-use is described as where the land application of a waste material is a genuine, fit for purpose, reuse of the waste rather than another path to waste disposal. An exemption facilitates the use of these waste materials outside of certain regulatory requirements such as the need to obtain an environment protection licence or the payment of waste levies.

The following resource recovery exemptions are of most relevance to road construction activities:

- Excavated natural material
- Excavated public road material
- Raw mulch
- Reclaimed asphalt pavement
- Recovered aggregate

Summary fact sheets on these wastes and the use of resource recovery exemptions, including any sampling and testing requirements, can be found on RMS’ Intranet site- [Waste Fact Sheets](#).

### 2.2.4 Contaminated Land Management Act, 1997 (CLM Act)

The CLM Act allows the EPA to respond to contamination of soil, groundwater and surface water and specifies the level of responsibilities for managing contamination. It also provides the regime for the accreditation of site auditors.

Section 60 of the Act introduces a mandatory obligation for a person whose activities have contaminated land or owns land that is contaminated (whether before or during the owner’s ownership) to report contamination in writing to the EPA, known as ‘Duty to Report’.

**Key Compliance Requirements:** There is a duty for landowners and people who have responsibility for contamination to report it to the NSW Environment Protection Authority (NSW EPA).

It should be noted that the RMS protocol is to pro-actively communicate with relevant agencies when contamination is identified. This will ensure that the needs of all relevant stakeholders can be incorporated into the management of contamination.

Reporting triggers, and guidance on how they should be applied, are provided within the NSW EPA (2009) ‘Guidelines on the Duty to Report Contamination under the CLM Act 1997’. RMS’ [Guideline for the Management of Contamination](#) outlines RMS’ reporting requirements.



### 2.2.5 Best Practice Note: Environmental Assessment Reports and Waste Contingency Planning

Road project environmental assessment (EA) reports include information on the management of excavated soils and other materials.

EA reports should identify options for managing road construction materials in accordance with the waste hierarchy principles of:

- **Waste avoidance:** Minimising the amount of material that needs to be excavated and managed in the first place.
- **Re-use on site:** Where possible, the re-use of excavated materials within the project site is to be maximised. This reduces the need to import materials onto the site, reduces the need to find off site re-use or disposal locations and the associated materials handling and transport issues, reduces fuel use and minimises the project footprint.
- **Re-use off site:** Where all attempts to re-use excavated materials on site have been exhausted, re-use opportunities must be found off site. This includes finding sites that are approved by the relevant planning consent authority (e.g. local council) to accept the specific type of material that has been excavated from the road construction project. For example, transporting virgin excavated natural material (VENM) to a building development site that has Development Consent from the local council to accept VENM for use as engineered fill.
- **Disposal:** *Disposal* is the last and least preferable management option to be considered. If excavated materials must be disposed of, it must be transported to a facility that is licensed by the EPA to accept the specific material that requires disposal.

The EA report should include estimates of the total volume of surplus material to be generated by the project and identify how this material is to be managed in accordance with the waste hierarchy.

For materials that are to be re-located off-site, specific details are required for each permanent re-use and disposal site as well as all temporary material storage sites. The EA report should include the following:

- Site locations
- Type of waste to be deposited on the site (e.g. virgin excavated natural material, concrete waste)
- Volume of waste to be deposited on the site
- Whether the material will be placed on the site permanently or temporarily
- If the material is to remain on site permanently, what is the beneficial re-use of the material? (e.g. noise mound, visual barrier, engineered fill) - Note that it is illegal to leave waste on a site permanently unless it is being beneficially re-used as per a relevant EPA resource recovery exemption (see Section 2.2.3) or the site is licensed as a waste facility to accept the waste.

#### **Planning for Waste Contingencies**

Pre-construction estimates of the volume of surplus material to be generated by a project are often exceeded. One of the main reasons that this occurs is that the quality of the sub-surface ground conditions are only well understood once construction earthworks commence. As a result, materials that were expected to be re-used for engineering purposes can be found to be unsuitable (e.g. soils are found to be too wet to be compacted for use in embankment construction).

Similarly, extended wet weather periods during the construction phase can saturate soils making them no longer suitable for compaction. These types of scenarios can sometimes result in the pre-construction estimates of the volume of surplus material to be significantly exceeded, requiring additional re-use or disposal sites to be identified.

EA reports should cover the possibility of additional surplus material being excavated and identify contingency sites where additional volumes of surplus material can be managed. If the EA report does not identify all potential sites where surplus material may be permanently placed or temporarily stored, there is the potential for significant project delays during the construction stage while supplementary planning approval is sought to use these additional sites.

Ideally, contingency planning should:

- Where possible, estimate the additional volume of surplus material that may need to be managed.
- Build in contingency by considering as many options as possible to beneficially re-use materials so as to allow for flexibility at construction stage (see below for examples of acceptable beneficial re-use options).
- Identify a range of potential sites both within the project boundary and off-site that could be used for the permanent re-use or temporary storage of additional volumes of material.
- Identify possible detailed road design changes that could be made that will allow for the beneficial re-use of additional surplus material (for example, changes to road batters).
- RMS' [Stockpile Management Guidelines \(RMS 2011\)](#) provides the basic principles for the temporary storage of materials.

### ***Acceptable beneficial re-uses***

In assessing permanent re-use options the concept of beneficial re-use is to be applied. Beneficial re-use is where the land application of the material is a genuine, fit for purpose re-use of the waste rather than another path to waste disposal.

Acceptable beneficial re-uses on road projects include:

- Construction of acoustic and visual mounds where there is a benefit to residents and other sensitive receivers
- Flattening of road batters
- Rehabilitation of borrow pits
- Engineered fill (e.g. establishment of house pads on RMS land)
- Approved improvements to flood prone land

### **Urban Design Best Practice**

It is RMS urban design policy that earthworks are designed so the project fits into the natural and built landscape. This includes cuttings, embankments, fills, noise mounds and any mounds created out of surplus material either on site or off site.

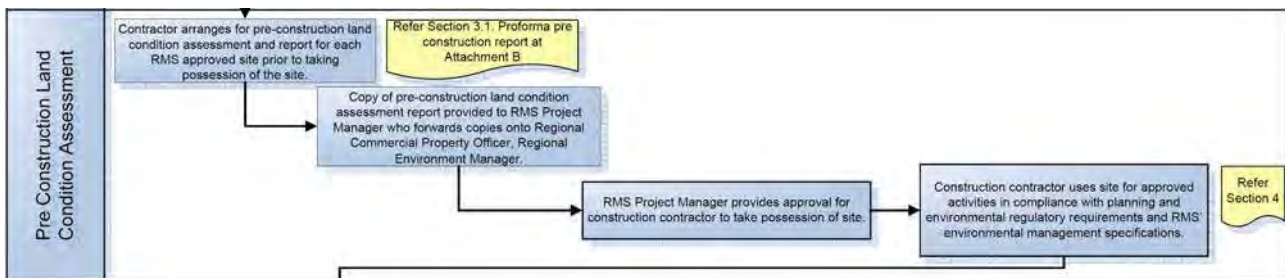
This means that earthworks must be sensitive to the shape of the natural landform in which the project is situated, unless more formal sculptural forms are created with RMS approval. Slopes should be compatible with stable vegetated slopes of the area. Large unnatural flat horizontal areas should be avoided. Changes in gradients and orientations of slopes should be rounded smooth transitions. Ridges and mounds should be asymmetric and avoid horizontal lines and formal shapes.

### 3. Pre-Construction Land Condition Assessments

When RMS land is used for ancillary construction purposes, there is the potential for unapproved wastes to remain on the site, or for the site to become contaminated from construction activities.

Prior to an RMS site being handed over to a construction contractor, the contractor must arrange for a pre-construction land condition assessment of the site. The purpose of the pre-construction land assessment is to identify any pre-existing wastes on the site before the contractor takes possession of the site. The pre-construction land condition assessment will be used to compare against the post construction condition of the site.

#### Summary Pre-Construction Land Condition Assessment



#### 3.1 Pre-Construction Land Condition Assessment Reports

Pre-Construction Land Condition Assessments Reports are not site contamination reports, rather they seek to establish and document whether there are any pre-existing wastes on the site prior to the site being occupied by a construction contractor.

Pre-Construction Land Condition Assessment reports are to be undertaken by a qualified independent environmental consultant approved by RMS. The environmental consultant is to have experience in site environmental inspections and construction waste management. RMS is to be nominated as the primary recipient of the report.

Pre-Construction Land Condition Assessment Reports are to include text, photographs and maps to describe the land condition, focussing on any pre-existing wastes on the site.

A proforma Pre-Construction Land Condition Assessment Report is included in Attachment B

As a minimum include the following information:

- Name of RMS project
- Name of construction company and construction site manager
- Description of site being acquired by construction company (Lot and DP)
- Estimated period of site occupation
- Current site use
- Proposed construction activities on the site
- Date of site inspection
- Evidence of RMS approval to use the site for the proposed activities (required where the contractor is seeking approval to use additional sites not already nominated by the Principal)
- Evidence of planning consent to use the site for the proposed activities - confirmation that the environmental assessment report has identified the use of the sites for the proposed activities. (required where the contractor is seeking approval to use additional sites not nominated by the Principal)

- Site observations (include descriptions, photographs and annotated site maps) showing:
  - Pre-existing wastes on site (stockpiles, type of waste, where on the site is the waste located, estimated quantity)
  - Materials stored on site
  - Existing excavated areas
  - Waterways running through the sites (comments and photographs of any dumped materials in waterways)
  - Any other features that help establish the pre construction condition of the site

### **3.2 Who arranges for the Pre-Construction Land Condition Assessment?**

The site contractor is to arrange a Pre-Construction Land condition Assessment and report. It is important that it be made clear to any consultant engaged to prepare a Pre-Construction Land Condition Assessment Report that the primary recipient of the report is RMS.

### **3.3 Who performs the Pre-Construction Land Condition Assessment ?**

Pre-Construction Land Condition Assessment inspections and reports are to be prepared by an independent environmental consultant approved by RMS with experience in areas such as site environmental inspections and construction waste management.

### **3.4 How long will it take to prepare a Pre-Construction Land Condition Assessment Report?**

As a guide, Pre-Construction Land Condition Assessment inspections and reports should take approximately one to two weeks to complete.

### **3.5 Who receives copies of Pre-Construction Land Condition Assessment Report?**

The contractor is to provide final copies of Pre-Condition Site Assessment Report to the RMS Project Manager. The RMS Project Manger is to forward copies of the reports to:

- RMS Regional Property Team (Commercial Property Officer)
- RMS Regional or RMS Project Environment Manager

## 4. Construction Phase Site Management

### Construction Phase Management

During the construction phase contractors must comply with all relevant environmental regulatory requirements related to the testing, record keeping, transport and storage of materials onto RMS' site. RMS' environmental management specifications G36: Environmental Protection and G38: Soils and Water Management must also be complied with.

The ability to supply records showing compliance with environmental regulations and RMS' environmental management specifications will facilitate the Post-construction Site Assessment (see Section 5) and approval for the site to be returned to RMS.

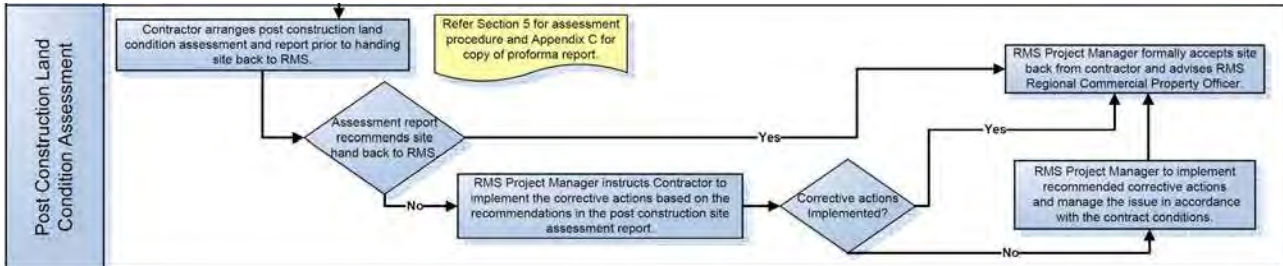
These records include:

- ☐ Copies of any written approvals from RMS Property to use the site for the construction activities undertaken at the site (where the contractor has sought permission to use sites addition to those nominated by RMS in the contract).
- ☐ Copies of planning consents to use the site for the construction activities (where the contractor has sought permission to use sites addition to those nominated by RMS in the contract).
- ☐ Evidence of compliance with any planning consent conditions or EPA licence requirements related to the activities on the site.
- ☐ Site maps showing location of temporary construction activities including location of temporary stockpiles.
- ☐ Site maps showing location and type of waste that permanently remaining on site.
- ☐ Evidence of RMS approval to leave materials permanently on the site.
- ☐ Register of materials transported to the site in accordance with the requirements of RMS G36 Specification clause 4.11.2 - Waste Management Register.
- ☐ Copies of any test results to show compliance with any relevant resource recovery exemptions.
- ☐ Evidence of compliance with any additional conditions specified by RMS Property or the Project Manager (e.g. soil engineering compaction rates, retain clean topsoil on the site).

## 5. Post-Construction Land Condition Assessments

Prior to a site being handed back to RMS, a post-construction land condition assessment is required to verify that no unauthorised construction wastes remain the site.

### Summary Post-Construction Land Condition Assessment



### 5.1 Post-Construction Land Condition Assessment Reports

RMS has developed a pro-forma Post-Construction Land Condition Assessment report which is to be used to determine whether a site is suitable to be handed back to RMS. The report includes a series of waste management and environmental planning compliance questions that are to be answered and the citing of documentary evidence to support the answers to some questions. The report is also to be used to record any observations of significant staining of the ground which needs to be managed. A copy of the Post-Construction Land Condition Assessment Report proforma is included as Attachment C.

Prior to a site being occupied by a construction contractor, a Pre Construction Land Condition Assessment Report (see Section 3) should have been prepared. This report is to be used as the benchmark to compare against the post construction land condition of the site.

In summary, the Post-Construction Land Condition Assessment Report includes the following information.

- Name of RMS project
- Name of construction company and construction site manager
- Description of site being acquired by construction company (Lot and DP)
- Whether the site was used for temporary materials storage.
- Whether materials have permanently been left on site.
- Record of any observations of significant staining of the ground.
- Evidence of compliance with any relevant resource recovery exemptions.
- Evidence of compliance with any EPA licence conditions and Department of Planning consent conditions.
- Evidence of internal and statutory approvals to use the site.
- Recommends whether the site is in a condition to be handed back to RMS.
- Any recommended corrective actions that should be completed before the site is handed back to RMS.



## **5.2 What if the site is not in a condition to be handed back to RMS?**

If the report concludes that unapproved wastes attributable to the activities of the construction contractor remain on site and that RMS should not accept hand back of the site, the construction contractor should be given an opportunity to complete any corrective actions.

If the contractor fails to complete the corrective actions, the RMS Project Manager must make alternative arrangements to implement the corrective actions before handing the site back to the RMS Property. RMS' Project Manager will manage the issue in accordance with the provisions of the construction contract.

## **5.3 Who arranges for the Post-Construction Land Condition Assessment?**

The contractor is to ensure that the post construction site assessment is undertaken. It must be made clear to any consultant engaged to prepare a Post-Construction Land Condition assessment report that the primary recipient of the report is RMS.

## **5.4 Who performs the Post-Construction Land Condition Assessment?**

The Post-Construction Land Condition Assessment is to be completed by an independent environmental consultant approved by RMS with experience in areas such as site environmental inspections, construction waste management.

## **5.5 Who receives copies of Post-Construction Land Condition Assessment Report?**

The contractor is to provide final copies of Post-Construction Land Condition Assessment Reports to the RMS Project Manager. The RMS Project manager is to forward copies of the report to:

- RMS Regional Property Team (Commercial Property Officer)
- RMS Regional or RMS Project Environment Manager

# ATTACHMENT A: WASTE AND MATERIALS MANAGEMENT ACTIVITIES REQUIRING AN ENVIRONMENT PROTECTION LICENCE

Activity	Licence Trigger
<b>Chemical storage</b> - hazardous waste, restricted solid waste or liquid waste (or combination of these)	- Having on site at any time more than 5 tonnes of hazardous waste, restricted solid waste or liquid waste, or combination of them).
<b>Contaminated soil treatment</b>	- Capacity to treat more than 1,000m <sup>3</sup> per year of contaminated soil received from off-site; or - Treatment of contaminated soil originating exclusively on-site with capacity: <ul style="list-style-type: none"> <li>Greater than 1000m<sup>3</sup> per year for incineration</li> <li>Storage and treatment of greater than 30,000m<sup>3</sup> per year where treatment is other than incineration</li> <li>To disturb more than an aggregate area of 3 hectares of contaminated soil</li> </ul>
<b>Contaminated groundwater treatment</b>	- Capacity to treat more than 100 megalitres per year of contaminated groundwater.
<b>Waste disposal (application to land)</b>  Includes application of waste for the filling, reclaiming or contouring of land.  <b>(eg. re-using excavated road materials)</b>	Waste disposal by application to land, meaning the application to land of waste received from off site, including (but not limited to) application by any of the following methods: (a) spraying, spreading or depositing on the land, (b) ploughing, injecting or mixing into the land, (c) filling, raising, reclaiming or contouring the land.  <b>No licence is required if:</b> <ul style="list-style-type: none"> <li>The material is virgin excavated natural material (VENM)</li> <li>Covered by a "resource recovery exemption" such as <ul style="list-style-type: none"> <li>Excavated public road materials – if applied within road corridors</li> <li>Excavated natural material - applied off-site</li> <li>Recovered asphalt pavement – if re-applied for road making activities</li> </ul> </li> </ul>
<b>Waste processing (non thermal treatment)</b> <b>(eg. concrete crushing)</b>	Receiving and processing of waste from off-site that involves having on site at any time: <ul style="list-style-type: none"> <li>more than 2,500 m<sup>3</sup> or tonnes of general solid waste or involves the processing of more than 120 tonnes per day, or 30,000 tonnes per year.</li> <li>more than 200 kilograms of hazardous waste</li> <li>more than 200 kilograms of liquid waste</li> <li>more than 2,000 litres of waste oil or involves processing of more than 20 tonnes per year</li> <li>more than 50 tonnes of waste tyres or processing more than 20 tonnes per day or, 5,000 tonnes per year.</li> </ul> <b>Note:</b> Crushing, grinding or separating non waste materials such as sand, gravel, rock or minerals, requires a licence if the plant or equipment has a capacity to process more than 150 tonnes of materials per day or 30,000 tonnes of materials per year.
<b>Waste storage (storage of waste received from off-site, including storage for transfer of waste)</b> <b>(eg. Stockpiles)</b>	(a) Greater than 5 tonnes of hazardous waste, restricted solid waste, liquid waste, clinical or related waste or asbestos waste is stored on the premises at any time, or (b) Greater than 50 tonnes of waste tyres or 5,000 waste tyres is stored on the premises at any time, or (c) Greater than 2,500 tonnes or 2,500 cubic metres of waste (other than waste referred to in a and b above) is stored on the premises at any time, or (d) Greater than 30,000 tonnes of waste (other than waste referred to in a and b above) is received per year from off-site.  <b>No licence is required for stockpiling of excavated road materials if it is done in accordance with the RMS Stockpile Exemption (2011).</b>



ATTACHMENT B: PRE-CONSTRUCTION LAND CONDITION ASSESSMENT REPORT

**PRE-CONSTRUCTION LAND CONDITION ASSESSMENT REPORT**

**Instructions**

**This report is to be completed by a qualified independent environmental consultant approved by RMS. RMS is the primary recipient of the report.**

This report and attached supporting information is to be used to establish and document any pre-existing wastes on an RMS site that is to be used for temporary site facilities or sites where material is to be permanently located for beneficial re-use.

Temporary site facilities include but are not limited sites where the following activities take place:

- Soil and rock stockpiling
- Storage of construction materials
- Locating site sheds, storage sheds and maintenance yards
- Concrete crushing
- Temporary concrete or asphalt batching plants
- Location of temporary sediment basins
- Vegetation storage
- Construction staging areas (e.g. assembling bridge structures)

Permanent beneficial re-use includes:

- Noise mounds
- Visual mounds
- Engineered fill
- Flood relief mounds

This Pre-construction Land Condition Assessment Report is to be completed prior to a contractor taking possession of an RMS site and will be used as the benchmark to compare against the post construction condition of the site.

Copies of the final report and any supporting information are to be provided to the RMS Project Manager. The RMS Project Manager is to provide copies to:

- RMS Regional Commercial Property Officer
- RMS Regional or RMS Project Environment Manager

If multiple RMS sites are to be occupied by a construction contractor, a separate Pre Construction Land condition Assessment report is to be prepared for each site.

## Management of Wastes on Roads and Maritime Services Land

<b>Section A: Project Information</b>	
Project Name:	
RMS Project Manager:	
Construction Contractor:	
Construction Manager:	
Proposed period of site occupation:	dd/mm/yy to dd/mm/yy
<b>Section B: Site Location</b>	
Location and current land use of the site	<p>Information attached</p> <p><input type="checkbox"/> Map showing site location</p> <p><input type="checkbox"/> Lot and DP _____</p> <p><input type="checkbox"/> Current land use _____</p> <p><input type="checkbox"/> Other information attached (specify) _____</p>
<b>Section C: Proposed Construction Activities for the Site</b>	
Describe the construction activities that are proposed for the site.	
<b>Section D: Planning Consent and Internal RMS Consent for Use of Site</b>	
<p>What planning permission has been obtained for the proposed construction activities?</p> <p>(E.g. EIS, REF, local council consent. Attach evidence of approval, consistency assessment)</p>	<p>Information attached</p> <p><input type="checkbox"/> EIA (Part 5 or 5.1 EP&amp;A Act)</p> <p><input type="checkbox"/> Statement of Environmental Effects (Local council approval under Part 4 EP&amp;A Act)</p> <p><input type="checkbox"/> Written evidence showing that consent is not required</p> <p><input type="checkbox"/> Other (specify) _____</p>
<p>Did the Regional RMS Property section provide written consent for the site to be used for the proposed construction activities?</p>	<p>Information attached</p> <p><input type="checkbox"/> Yes. Written consent provided</p> <p><input type="checkbox"/> No. Written consent not provided</p>

Section E: Pre-Construction Site Inspection	
Date of site inspection:	
Name of consultant undertaking inspection:	
Position title:	
Name of consulting company:	
<p>Attach to this section of the report text descriptions, photographs and annotated site maps to describe the wastes and materials that exist on the site at the time of inspection. Site observations include the following:</p> <ul style="list-style-type: none"> <li>– Pre-existing wastes on site (stockpiles, type of waste, where on the site is the waste located, estimated quantity)</li> <li>– Existing materials stored on site</li> <li>– Existing excavated areas</li> <li>– Waterways running through the sites (comments and photographs of any dumped materials in waterways)</li> <li>– Any other features that help establish the pre-construction land condition (e.g. obvious staining on the ground).</li> </ul>	



## ATTACHMENT C: POST-CONSTRUCTION LAND CONDITION ASSESSMENT REPORT

### POST-CONSTRUCTION LAND CONDITION ASSESSMENT REPORT

#### Instructions

This report and attached supporting information is to be used to verify that no unauthorised wastes remain on RMS sites that have been occupied by contractors for road construction activities.

Prior to an RMS site being occupied by a construction contractor, a Pre-Construction Land Condition Assessment Report should have been prepared. The Pre-Construction Land Condition Assessment Report is to be used as the benchmark to compare against the post construction condition of the site.

This report is to be completed by a qualified independent environmental consultant approved by RMS. RMS is the primary recipient of the report.

Copies of the final report and any supporting information are to be provided to the RMS Project Manager. The RMS Project Manager is to provide copies to:

- RMS Regional Commercial Property Officer
- RMS Regional or RMS Project Environment Manager

If multiple sites have been occupied by a construction contractor, use a separate Post-Construction Site Condition Assessment report for each site.

#### Section A: Project Information

Project Name:	
RMS Project Manager:	
Construction Contractor:	
Construction Manager:	
Construction commencement date:	
Construction completion date:	

#### Section B: Site Location

Location of the site	Information attached <input type="checkbox"/> Map showing site location <input type="checkbox"/> Lot and DP _____ <input type="checkbox"/> Other information attached (specify) _____
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Section C: Waste Information – Temporary Storage		
Was any part of the site used to temporarily store project materials or create temporary structures? (e.g. temporary hardstand areas for site sheds or concrete batching facilities)	<input type="checkbox"/> Yes <input type="checkbox"/> No (If no, proceed to Section D)	
Provide information on the location and type of materials temporarily stored or used on the site?	Information attached <input type="checkbox"/> Map showing exact locations of temporary storage facilities or temporary structures <input type="checkbox"/> Description of types of material temporarily stored or used on the site.	
Have all temporary materials been removed from the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Section D: Waste Information – Materials Permanently Remaining on Site		
Describe the types and quantity of wastes left on the site.		
Type of waste	Quantity (m <sup>3</sup> )	Dates material was deposited (dd/mm/yyy to dd/mm/yyyy)
<input type="checkbox"/> Virgin excavated natural material (VENM)		
<input type="checkbox"/> Excavated natural material (ENM)		
<input type="checkbox"/> Recovered aggregates		
<input type="checkbox"/> Reclaimed asphalt pavement (RAP)		
<input type="checkbox"/> Crushed concrete		
<input type="checkbox"/> Mixed building and demolition waste	Not permitted to be permanently left on RMS land	
<input type="checkbox"/> Mulch		
<input type="checkbox"/> Unmulched vegetation		
<input type="checkbox"/> Other wastes (specify)		
<input type="checkbox"/> Obvious staining indicating a possible fuel or chemical spill	Estimate size of stained area, photograph stained area, make enquiries re. type of liquid spilled and attach information to this pro-forma. Include any recommendations in Attachment A.	
If no project wastes remain on the site go to Section F of this report. If you have entered information into the above table you must complete Sections D, E and F of this report.		
If more than one type of waste has been left on site, is it mixed together or separated and located in different locations?	<input type="checkbox"/> Mixed <input type="checkbox"/> Separated in different locations <input type="checkbox"/> Not applicable	
Section D: Location of waste		
Describe the exact location(s) of the waste (Attach maps, map co-ordinates (map grid of Australia (mga)), depth of waste below surface, area of waste, lot and DP of site, chainage)	Information attached <input type="checkbox"/> Map showing waste deposition area <input type="checkbox"/> Map co-ordinates <input type="checkbox"/> Depth of waste below surface <input type="checkbox"/> Lot and DP of waste deposition site <input type="checkbox"/> Road Chainage <input type="checkbox"/> Other information attached (specify)	



Section E: Compliance with EPA Resource Recovery Exemptions (RRE) or Report Indicating Material is Suitable for Future Land Use	
<p>Is the material ENM, recovered aggregates or RAP</p> <p>If any of the materials are ENM, recovered aggregates or RAP, the conditions attached to the corresponding EPA resource recovery exemptions (RRE) must be complied with.</p> <p>Have all conditions attached to the relevant RRE been complied with?</p>	<p> <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Not applicable                 </p> <p>Information attached</p> <p> <input type="checkbox"/> Test reports  <input type="checkbox"/> RRE records  <input type="checkbox"/> Other information attached (specify)                      _____                 </p>
<p>The use of resource recovery exemptions requires that the material has been "beneficially re-used".</p> <p>What is the beneficial re-use of permanently leaving the material on the site (e.g. noise mound, visual mound, engineered fill or earthworks to improve the property)</p>	<p> <input type="checkbox"/> Noise mound  <input type="checkbox"/> Visual mound  <input type="checkbox"/> Landscape mound  <input type="checkbox"/> Engineered fill or earthworks (specify how this improves the property)                      _____                      _____                 </p> <p> <input type="checkbox"/> Other beneficial re-use (specify)                      _____                      _____                 </p>
<p>In some instances, compliance with a relevant RRE is not legally required (e.g. the material was excavated and placed within the site boundary or the material was VENM).</p> <p>Are there any other records or reports indicating that the material is suitable for the intended post construction land use?</p> <p>(Attach copies of any relevant records or reports).</p>	<p> <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Not applicable                 </p> <p>Information attached</p> <p> <input type="checkbox"/> Test reports  <input type="checkbox"/> Other information attached (specify)                      _____                 </p>
Section E: Consents: RMS Property/Planning Consent/EPA Compliance	
<p>Did RMS provide written consent for the specified waste materials to be permanently left on the site?</p>	<p>Information attached</p> <p> <input type="checkbox"/> Yes. Written consent provided  <input type="checkbox"/> No. Written consent not provided                 </p>
<p>Did RMS Property require any additional technical requirements to be complied with?</p> <p>For example, RMS property may have required that material placed on the site be compacted to meet engineering standards for residential sites.</p>	<p>Information attached</p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Not applicable                 </p>

## Management of Wastes on Roads and Maritime Services Land

<p>What planning permission was obtained for the material to permanently remain on the site?</p> <p>(E.g. EIS, REF, local council consent. Attach evidence of approval, consistency assessment)</p>	<p>Information attached</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> EIA (Part 5 or 5.1 EP&amp;A Act)</li> <li><input type="checkbox"/> Statement of Environmental Effects (SEE) (Local council approval under Part 4 EP&amp;A Act)</li> <li><input type="checkbox"/> Written evidence showing that consent is not required</li> <li><input type="checkbox"/> Other (specify) _____</li> </ul>
<p>Were the conditions of the planning consent related to waste storage and use of ancillary facilities complied with?</p>	<p>Information attached</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Yes.</li> <li><input type="checkbox"/> No.</li> </ul>
<p><b>Section F: Recommendation</b></p>	
<p>Based on the above information and the attached evidence it is recommended that:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The site be handed back to RMS as no residual wastes attributable to the activities of the contractor remain on the site.</li> <li><input type="checkbox"/> The site be handed back to RMS as any wastes that remain on the site attributable to the activities of the contractor have been placed on site with the approval of RMS' regional infrastructure property team and in accordance with all necessary environmental statutory requirements.</li> <li><input type="checkbox"/> The site should <u>not</u> be handed back to RMS as unapproved wastes and/or contamination attributable to the activities of the contractor currently remain on the site. It is recommended that the corrective actions listed in Attachment A to this report be completed before the site is handed back to the landholder.</li> </ul> <p>Name of Site Assessor:          Position:          Company:</p> <p>Signed:          Date:</p>	

## ATTACHMENT A: POST-CONSTRUCTION LAND ASSESSMENT REPORT

### CORRECTIVE ACTIONS

It is recommended that the following corrective action be implemented before the site is handed back to the landholder.

[illegible]



## Management of Wastes on Roads and Maritime Services Land

Definitions	
Excavated natural material (ENM)	<p>ENM is naturally occurring rock and soil (including materials such as sandstone, shale, clay and soil) that has:</p> <ul style="list-style-type: none"> <li>a) been excavated from the ground, and</li> <li>b) contains at least 98% (by weight) natural material, and</li> <li>c) does not meet the definition of Virgin Excavated Natural Material (VENM).</li> </ul> <p>Excavated Natural Material does not include material that has been processed or contains acid sulphate soils or potential acid sulphate soils.</p>
Reclaimed asphalt pavement (RAP)	Means and asphalt matrix which was previously used as an engineering material and which must not contain a detectable quantity of coal tar or asphalt.
Recovered aggregates	Means material comprising of concrete, brick, ceramics, natural rock and asphalt processed into an engineered material. This does not include refractory bricks or associated refractory materials, or asphalt that contains coal tar.
Resource Recovery Exemptions (RRE)	RREs are granted by the EPA where the land application or use as fuel of a waste material is a genuine, fit for purpose, reuse of the waste rather than another path to waste disposal. An exemption facilitates the use of these waste materials outside of certain requirements of the waste regulatory framework.
Virgin Excavated Natural Material (VENM)	<p>VENM is natural material:</p> <ul style="list-style-type: none"> <li>• that has been excavated or quarried from areas that are not contaminated with manufactured chemicals or process residues, as a result of industrial, commercial, mining or agricultural activities, and</li> <li>• that does not contain sulphidic ores or soils.</li> </ul>
Waste	Waste is as defined in the Protection of the Environment Operations Act 1997 and is classified in accordance with the NSW EPA's <i>Waste Classification Guidelines</i> . Wastes can include excess soil, rock, concrete, aggregates, general construction and demolition waste, waste vegetation.



## **Annexure D – SEMP requirements**

NSW CoA	Description	Where addressed
A15	Construction ancillary facilities (excluding minor construction ancillary facilities established under Condition A20) that are not identified by description and location in the documents listed in Condition A1 may only be established and used in each case if:	Section 2.3 SEMP
	(a) They are located within or immediately adjacent to the construction boundary	
	(b) They are not located next to a sensitive receiver(s) (including where an access road is between the facility and the receiver(s)), unless the sensitive receiver(s) (both the landowner(s) and occupier(s)) have given written acceptance to the carrying out of the relevant facility in the proposed location; and	
	(c) they have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and	
	(d) The establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.	
A16	Before establishment of a construction ancillary facility(ies) (excluding minor construction ancillary facilities established under Condition A20), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the construction ancillary facility(ies). The Site Establishment Management Plan must be prepared in consultation with the relevant council(s) and relevant State government agencies.	Section 2.3 SEMP
	The Plan must be endorsed by the ER and then submitted to the Planning Secretary for approval one (1) month before the establishment of the construction ancillary facility(ies).	
	The Site Establishment Management Plan must detail the management of the construction ancillary facility(ies) and include:	
	(a) a description of activities to be undertaken during establishment of the construction ancillary facility(ies) (including scheduling and duration of work to be undertaken at the site);	
	(b) figures illustrating the proposed site layout and the location of the closest sensitive receiver(s);	

NSW CoA	Description	Where addressed
	<p>(c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of site establishment work;</p> <p>(d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the documents listed in Condition A1, A1, and</p> <p>(ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and</p> <p>(e) a program for monitoring the performance outcomes, including a program for noise monitoring consistent with the requirements of Condition C14.</p> <p>The Site Establishment Management Plan must be approved before the establishment of a construction ancillary facility(ies) (excluding minor construction ancillary facilities established under Condition A20). Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each construction ancillary facility. <i>Note: Condition A16 does not apply to minor construction ancillary facilities established under Condition A20.</i></p>	
A17	Where a construction ancillary facility(ies) has been established for any early works listed in Appendix B and is to be used for construction, a new or revised Site Establishment Management Plan must be prepared where additional activities are required to establish the site for the purposes of construction or there is a change to the site layout. The new or revised Site Establishment Management Plan must be prepared in accordance with Condition A16 and approved by the Planning Secretary before commencement of the additional activities or change to site layout.	Section 2.3 SEMP
A18	<p>The use of a construction ancillary facility for construction (excluding minor construction ancillary facilities established under Condition A20 and construction ancillary facilities established for the purposes of early works in accordance with Condition A24) must not commence until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C4 and relevant Construction Monitoring Programs required by Condition C11 have been approved by the Planning Secretary.</p> <p>This condition does not apply to the use of construction ancillary facilities where the ER has determined that the use of the facility will have a minimal impact on the environment and community.</p>	Section 2.3 SEMP



NSW CoA	Description	Where addressed
A19	<p>Construction ancillary facilities established for the purposes of early works in accordance with Condition A24 cannot be used for construction until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C4 and relevant Construction Monitoring Programs required by Condition C11 have been approved by the Planning Secretary.</p> <p>This condition does not apply to the use of construction ancillary facilities where the ER has determined that the use of the facility will have a minimal impact on the environment and community.</p>	Section 2.3 SEMP
A20	<p>Lunch sheds, office sheds, portable toilet facilities, and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria:</p> <p>(a) are located within or adjacent to the construction boundary; and</p> <p>(b) have been assessed by the ER to have -</p> <p>(i) minor amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and</p> <p>(ii) minor environmental impact with respect to waste management, soil, water and flooding, and</p> <p>(iii) no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval.</p>	Section 2.3 Section 3 SEMP
A21	Boundary screening must be erected around all construction ancillary facilities that are adjacent to sensitive receivers for the duration of construction of the CSSI unless otherwise agreed with affected residents, business operators and landowners.	Section 2.3 Section 2.3.4
A22	Boundary screening required under <b>Condition A21</b> of this approval must minimise, as far as practicable, visual impacts on adjacent sensitive receivers.	Section 2.3 Section 2.3.4
A23	The CSSI name; application number; telephone number, postal address and email address required under Condition B7 of this approval must be made available on site boundary fencing / hoarding at the entrance of each ancillary facility before the commencement of construction.	Section 2.3 Section 2.3.4

NSW CoA	Description	Where addressed
E61	The CSSI must be constructed in a manner that minimises visual impacts of construction ancillary facilities, including but not limited to, providing temporary landscaping and vegetative screening of the construction sites, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located.	Section 2.3 Section 2.3.5
E62	The CSSI must be constructed and operated with the objective of minimising light spillage to surrounding properties. All lighting associated with the construction and operation of the CSSI must be consistent with the requirements of <i>Australian Standard 4282-2019 Control of the obtrusive effects of outdoor lighting</i> , relevant Australian Standards in the series <i>AS/NZ 1158 – Lighting for Roads and Public Spaces</i> , and the <i>National Airports Safeguarding Framework (NASF) Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports</i> .	Section 2.3 Section 2.3.5
	Additionally, mitigation measures must be provided to manage residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.	
E83	Any property access that is physically affected by the CSSI must be reinstated to at least an equivalent standard, in consultation with the landowner or alternative access provided in consultation with the landowner.	Section 2.3 Section 2.3.6

# Appendix A5

## Document Register

M12 Motorway – Central

December 2024

Environmental Management Document	Document No.	Approval Requirement	Agency Correspondence
Construction Environmental Management Plan ( <u>CEMP</u> )	M12CCO-SYW-ALL-PLN-000003	TfNSW, ER	M12CCO-SYW-ALL-PLN-000003
App A1 - Legal requirements and compliance tracking	M12CCO-SYW-ALL-PLN-000003		
App A2 - Environmental aspects and impacts	M12CCO-SYW-ALL-PLN-000003		
App A3 - Environmental policy	M12CCO-SYW-ALL-PLN-000003		
App A4 - Ancillary facilities assessment	M12CCO-SYW-ALL-PLN-000003		
App A5 - Document register	M12CCO-SYW-ALL-PLN-000003		
App A6 - Sensitive area plans	M12CCO-SYW-ALL-PLN-000003		
App A7 - Environmental incident classification and reporting	M12CCO-SYW-ALL-PLN-000003		
App A8 – EWMS template	M12CCO-SYW-ALL-PLN-000003		
App A9 – Pollution Incident Response Plan	M12CCO-SYW-ALL-PLN-000003		
CEMP App B1 - Construction Traffic Management Sub Plan	M12CCO-SYW-ALL-EN-PLN-000004	TfNSW, ER	
CEMP App B2 - Construction Noise and Vibration Management Sub Plan	M12CCO-SYW-ALL-EN-PLN-000005		
App B - Construction Noise and Vibration Monitoring Program	M12CCO-SYW-ALL-EN-PLN-000005		

Environmental Management Document	Document No.	Approval Requirement	Agency Correspondence
App - C Out of Hours Works Protocol	M12CCO-SYW-ALL-EN-PLN-000005		
CEMP App B3 - Construction Flora and Fauna Management Sub Plan	M12CCO-SYW-ALL-PLN-000006		
App B - Vegetation Clearing Procedure	M12CCO-SYW-ALL-PLN-000006		
App C - Fauna rescue and release procedure	M12CCO-SYW-ALL-PLN-000006		
App D - Unexpected Threatened Species and Threatened Ecological Communities (TECs) Finds Procedure	M12CCO-SYW-ALL-PLN-000006		
App E - Weed, Pest and Pathogen Management Plan	M12CCO-SYW-ALL-PLN-000006		
App F - Habitat Compensation Plan	M12CCO-SYW-ALL-PLN-000006		
App G - Snag Management Plan	M12CCO-SYW-ALL-PLN-000006		
App H - Farm Dewatering Management Plan	M12CCO-SYW-ALL-PLN-000006	TfNSW, ER	
App I - Native Fauna Mortality Video Surveys Methodology	M12CCO-SYW-ALL-PLN-000006		
App J - Tree Management Strategy	M12CCO-SYW-ALL-PLN-000006		
Appx K - Sensitive aerial vegetation maps	M12CCO-SYW-ALL-PLN-000006		
CEMP App B4 - Construction Soil and Water Quality Management Sub Plan	M12CCO-SYW-ALL-EN-PLN-000012		

Environmental Management Document	Document No.	Approval Requirement	Agency Correspondence
App B – Construction Soil and Water Quality Monitoring Program	M12CCO-SYW-ALL-EN-PLN-000012		
App C – Dewatering Management Plan	M12CCO-SYW-ALL-EN-PLN-000012		
App D – Erosion and Sediment Control Procedure	M12CCO-SYW-ALL-EN-PLN-000012		
App E – Tannin Management Procedure	M12CCO-SYW-ALL-EN-PLN-000012		
App F – Spill Response and Management Procedure	M12CCO-SYW-ALL-EN-PLN-000012		
CEMP App B5 Construction Contaminated Land Management Sub Plan	M12CCO-SYW-ALL-EN-PLN-000013		
App B - Unexpected Contaminated Land and Asbestos Finds Procedure	M12CCO-SYW-ALL-EN-PLN-000013		
App C - Asbestos Management Plan	M12CCO-SYW-ALL-EN-PLN-000013		
App D - Process for assessment of site contamination	M12CCO-SYW-ALL-EN-PLN-000013		
CEMP App B6 - Construction Heritage Management Sub Plan	M12CCO-SYW-ALL-EN-PLN-000007		
App B - Unexpected Heritage Finds and Human Remains Procedure	M12CCO-SYW-ALL-EN-PLN-000007		
CEMP App B7 - Construction Air Quality Management Sub Plan	M12CCO-SYW-ALL-EN-PLN-000008		
App B - Construction Air Quality Monitoring Program	M12CCO-SYW-ALL-EN-PLN-000008		

Environmental Management Document	Document No.	Approval Requirement	Agency Correspondence
CEMP App B8 - Construction Flood Management Sub-plan	M12CCO-SYW-ALL-EN-PLN-000009		
App B – Existing conditions flood extent maps	M12CCO-SYW-ALL-EN-PLN-000009	TfNSW, ER	
App C – Flood warning and evacuation procedure	M12CCO-SYW-ALL-EN-PLN-000009		
CEMP App B9 - Construction Waste and Resource Use Procedure	M12CCO-SYW-ALL-EN-PLN-000010		
App B - Template Waste Management Register	M12CCO-SYW-ALL-EN-PLN-000010		
App C - Spoil Management Plan	M12CCO-SYW-ALL-EN-PLN-000010		
CEMP App 10 - Climate Change Monitoring and Adaptive Management Framework	M12CCO-SYW-ALL-PLN-0000011		
App B - Climate baseline and projection data	M12CCO-SYW-ALL-PLN-0000011		
Staging Report (A9)	M12PPW-ADAP-ALL-EN-RPT-000001	ER, Planning Secretary	
Revised Staging Report (A13)	M12PPW-ADAP-ALL-EN-RPT-000001	ER, Planning Secretary	
Site Establishment Management Plan (A16)	M12CCO-SYW-ALL-PLN-000002	ER, Planning Secretary	
Revised Site Establishment Management Plan for construction ancillary facilities used for early works and then for construction (A17)	N/A – not triggered	ER, Planning Secretary	
Early Works – Environmental Management Plan (A25)	N/A – not triggered	ER, Planning Secretary	
Communication Strategy (B3)	M12-CSEP	ER, Planning Secretary	



Environmental Management Document	Document No.	Approval Requirement	Agency Correspondence
Sustainability Management Plan (Construction)	M12-SMP	TfNSW	

# Appendix A6

## Sensitive Area Plans






M12 Motorway – Central

January 2025

## Document control

File Name	M12 Central CEMP Appendix A6
Title	M12 Central CEMP: Appendix A6 Sensitive Area Plans
Document Number (Teambinder)	M12CCO-SYW-ALL-EN-PLN-000003

## Approval and authorisation

Plan reviewed by:	Plan endorsed by:
  Whyte Environmental Site Representative	 Seymour Whyte Project Manager
18/01/2024	18/01/2024
	

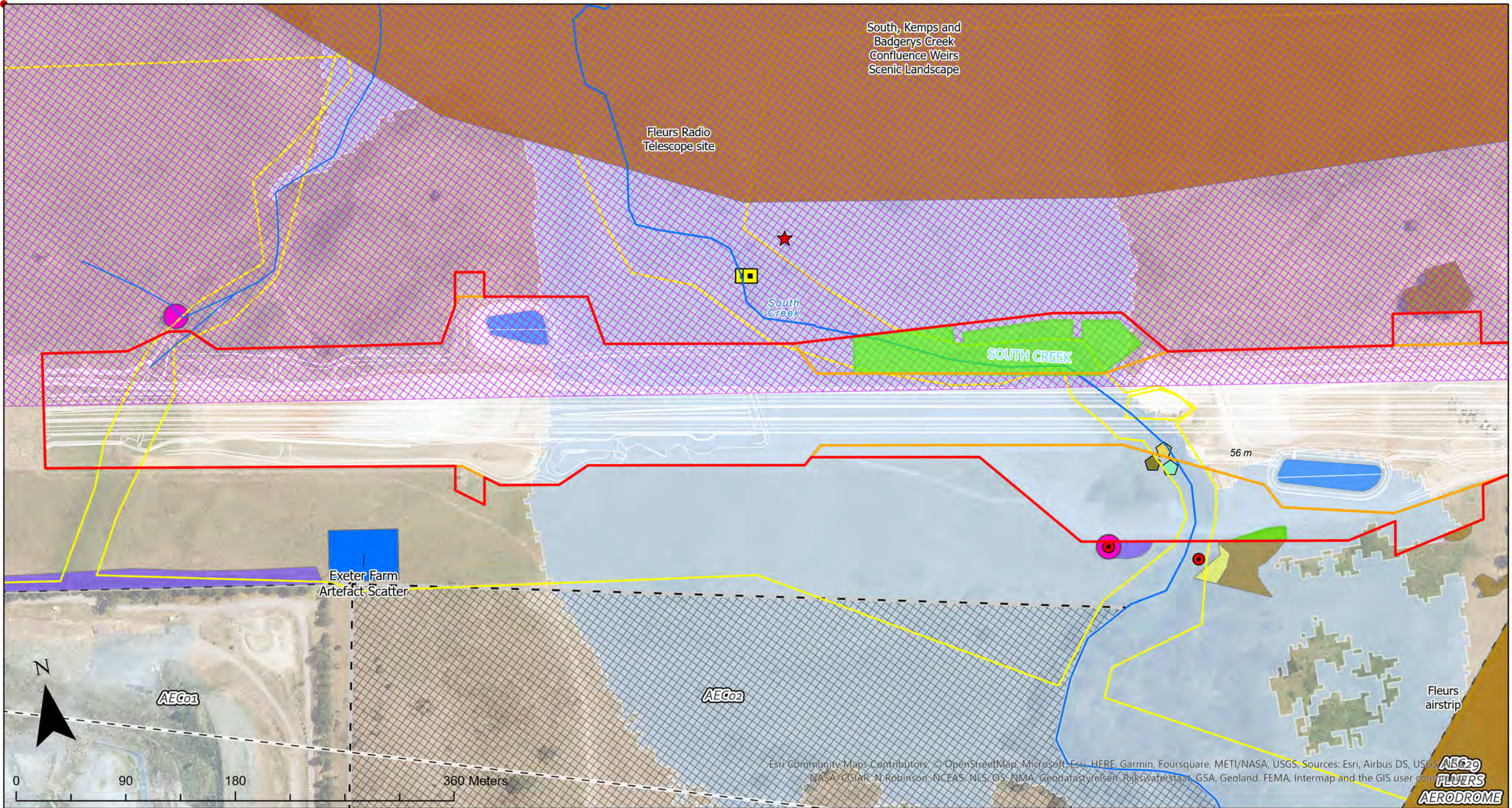
## Revision history

Revision	Date	Description
A	18/02/2022	First draft for TfNSW review
B	29/04/2022	Updated to respond to TfNSW comments
C	20/06/2022	Updated to respond to TfNSW comments
D	27/07/2022	Updated to respond to TfNSW comments
E	17/08/2023	Updated in response to OCEMP update.
F	18/01/2025	Updated in response to OCEMP update









- M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Greater Broad-nosed Bat

Little Bentwing-bat

Yellow-bellied Sheath-tail-bat

Habitat Trees

Southern Myotis Habitat

Aboriginal heritage sites complex (potential area of sensitivity)

Aboriginal Heritage sensitive area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Exeter Farm Artefact Scatter

Fleurs Radiotelescope Dishes

Fleurs Radiotelescope Cables

Area of Environment Concern

Potential Areas Of Fill

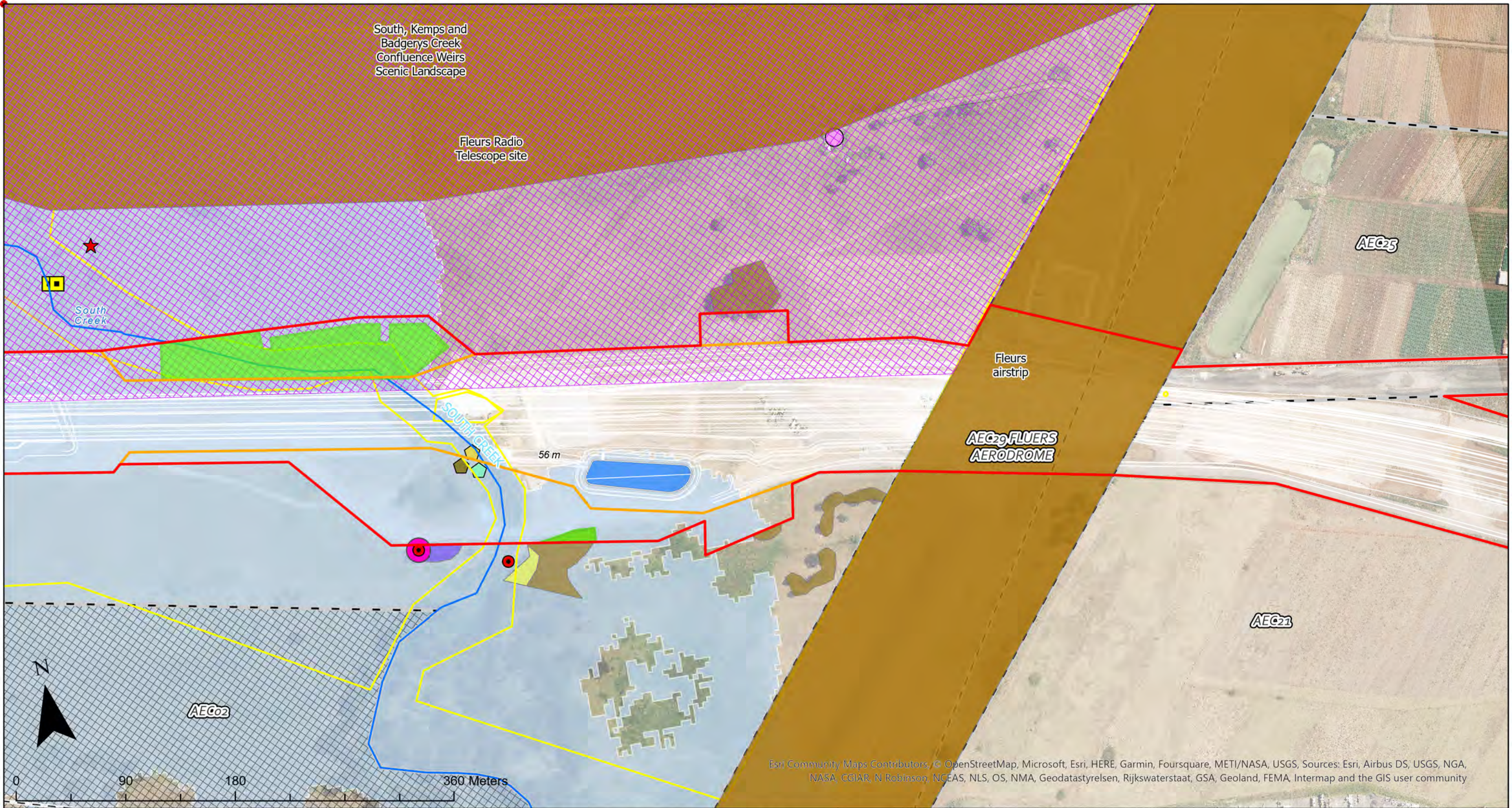
Flood Prone Lane (100yr ARI)

Cumberland Plain Woodland in the Sydney Basin Bioregion

River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions

Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions
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M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Greater Broad-nosed Bat

Little Bentwing-bat

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Habitat Trees

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Aboriginal heritages sites complex (potential area of sensitivity)

Aboriginal Heritage sensitive area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Fleurs Radiotelescope Dishes

Fleurs Radiotelescope Cables

Area of Environment Concern

Potential Areas Of Fill

Flood Prone Lane (100yr ARI)

Residential

Cumberland Plain Woodland in the Sydney Basin Bioregion

River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions

Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions

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South, Kemps and  
Badgerys Creek  
Confluence Weirs  
Scenic Landscape

Fleurs Radio  
Telescope site

Fleurs  
airstrip

AEC29 FLUERS  
AERODROME

AEC25

AEC26

AEC03

AF4

AEC20

AEC21

AF12a

AEC05

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M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Dillwynia tenuifolia

Habitat Trees

Aboriginal heritagesites  
complex (potential area of  
sensitivity)

Aboriginal Heritage sensitive  
area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Area of Environment  
Concern

Potential Areas Of Fill

Flood Prone Lane (100yr ARI)

Residential

Cumberland Plain Woodland in the Sydney  
Basin Bioregion

Shale Gravel Transition Forest in the  
Sydney Basin Bioregion

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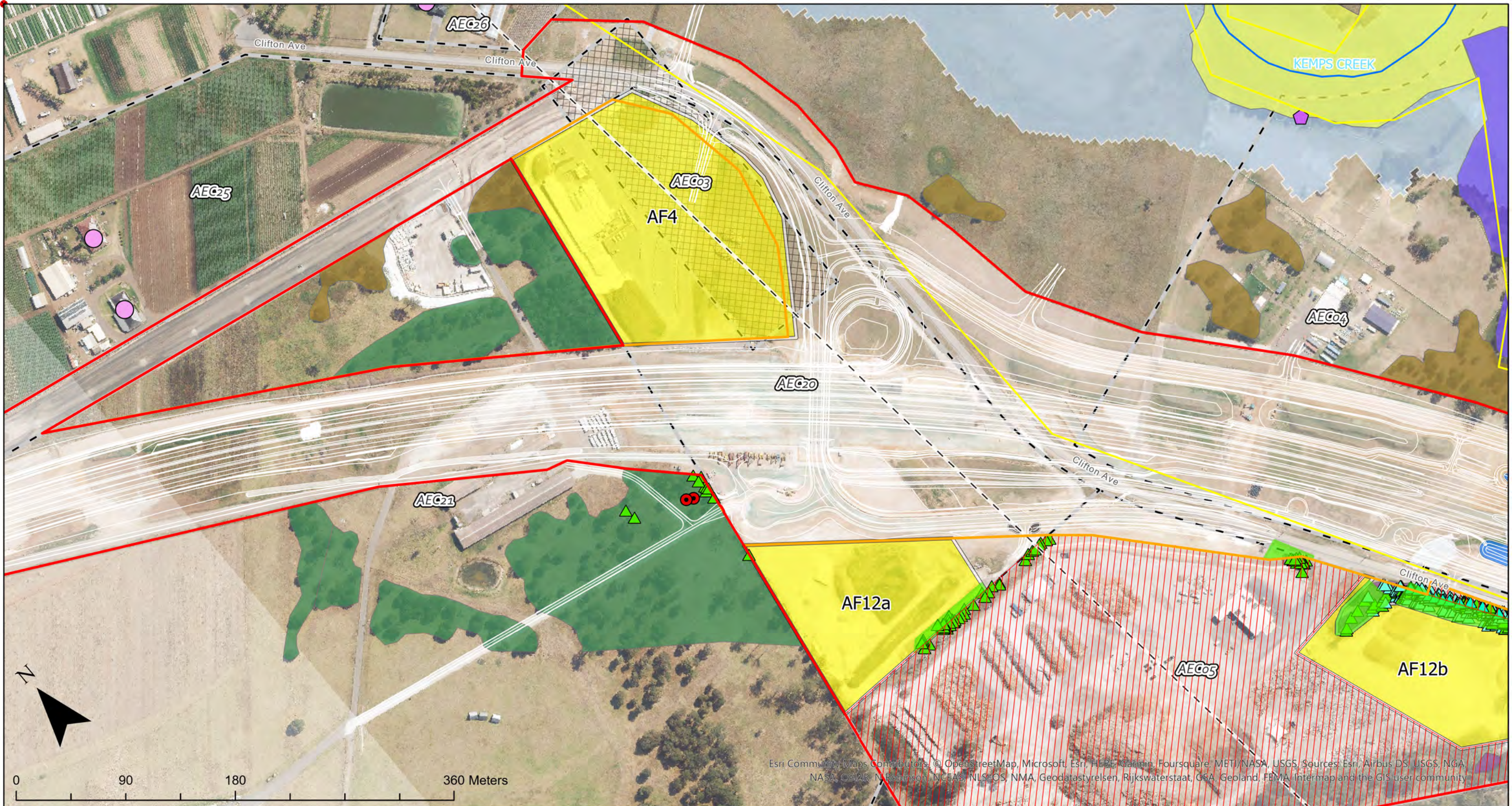
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SENSITIVE AREA PLANS

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- M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Dillwynia tenuifolia

Pultenaea parviflora

GHFF

Habitat Trees

Aboriginal heritages sites complex (potential area of sensitivity)

Aboriginal Heritage sensitive area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Area of Environment Concern

Potential Areas Of Fill

Flood Prone Lane (100yr ARI)

Residential

Castlereagh Scribbly Gum Woodland in the Sydney Basin Bioregion

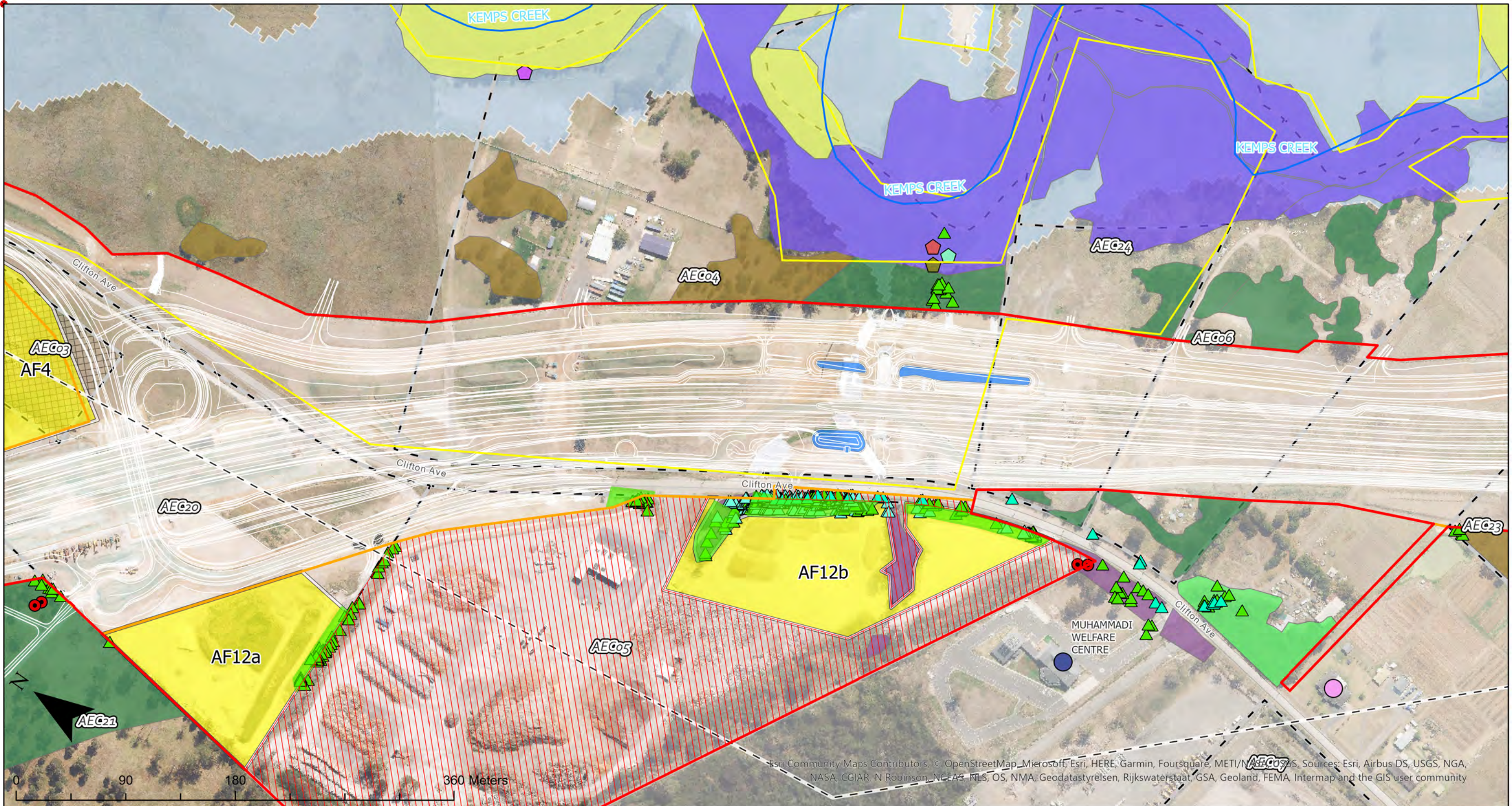
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Shale Gravel Transition Forest in the Sydney Basin Bioregion

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- M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Dillwynia tenuifolia

Pultenaea parviflora

Eastern Freetail-bat

GHFF

Greater Broad-nosed Bat

Little Bentwing-bat

Habitat Trees

Aboriginal heritages sites complex (potential area of sensitivity)

Aboriginal Heritage sensitive area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Area of Environment Concern

Potential Areas Of Fill

Flood Prone Lane (100yr ARI)

Place of Worship

Residential

Castlereagh Scribbly Gum Woodland in the Sydney Basin Bioregion

Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion

Cumberland Plain Woodland in the Sydney Basin Bioregion

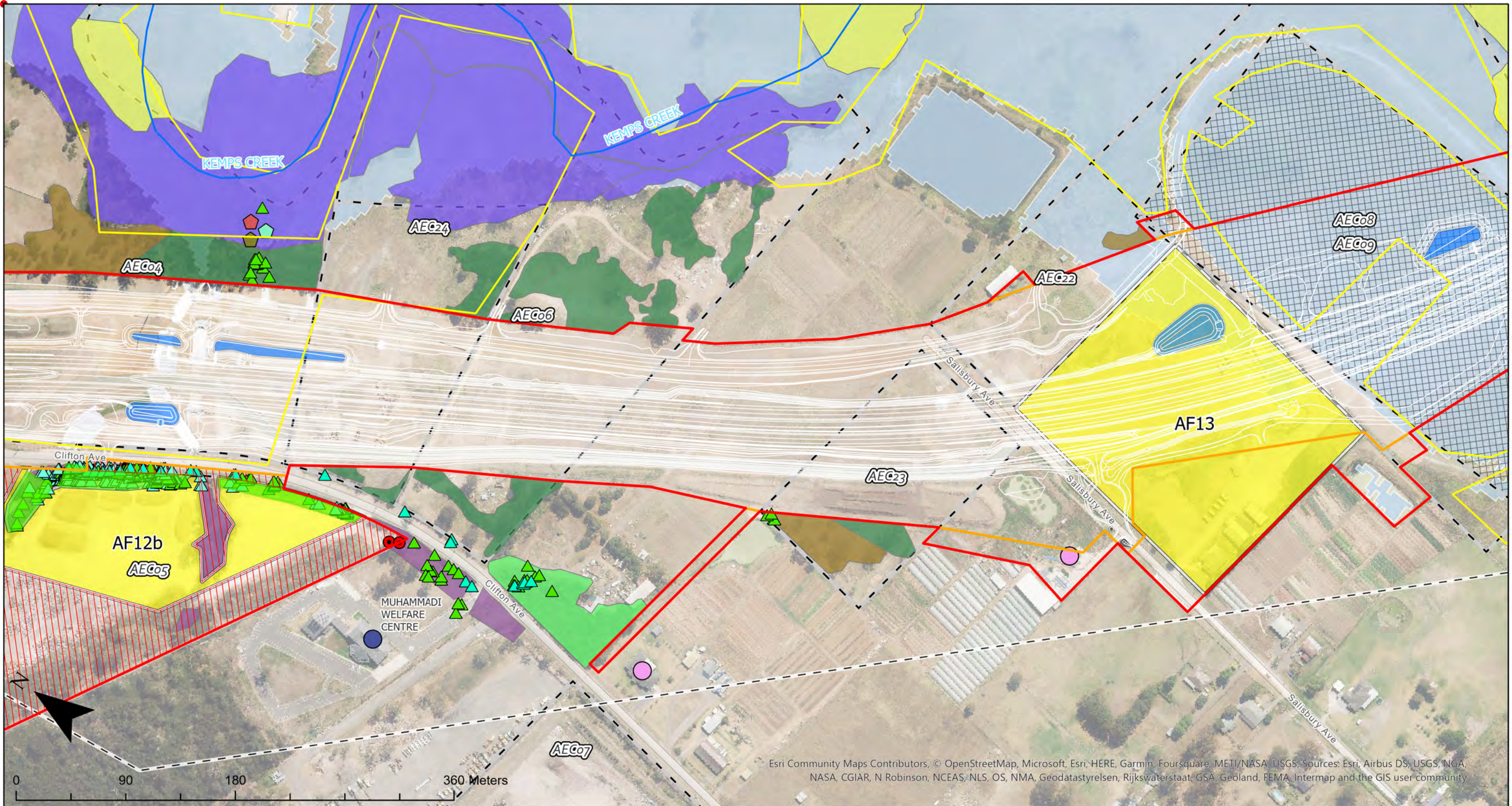
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Shale Gravel Transition Forest in the Sydney Basin Bioregion

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| SENSITIVE AREA PLANS      |  |
- Page 6 of 15





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M12 Central Construction Footprint	Dillwynia tenuifolia	Aboriginal heritages sites complex (potential area of sensitivity)	Non-Aboriginal Heritage sensitive area	Area of Environment Concern	Castlereagh Scribbly Gum Woodland in the Sydney Basin Bioregion	River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions
M12 Central Operational Footprint	Pultenaea parviflora	Aboriginal Heritage sensitive area	State and potentially national	Potential Areas Of Fill	Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion	Shale Gravel Transition Forest in the Sydney Basin Bioregion
M12C Construction Ancillary Facilities	Eastern Freetail-bat		State	Flood Prone Lane (100yr ARI)	Cumberland Plain Woodland in the Sydney Basin Bioregion	Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions
Exclusion Zones	Greater Broad-nosed Bat		Local	Place of Worship		
Vegetation Saving Area	Little Bentwing-bat			Residential		
Watercourses	Habitat Trees					

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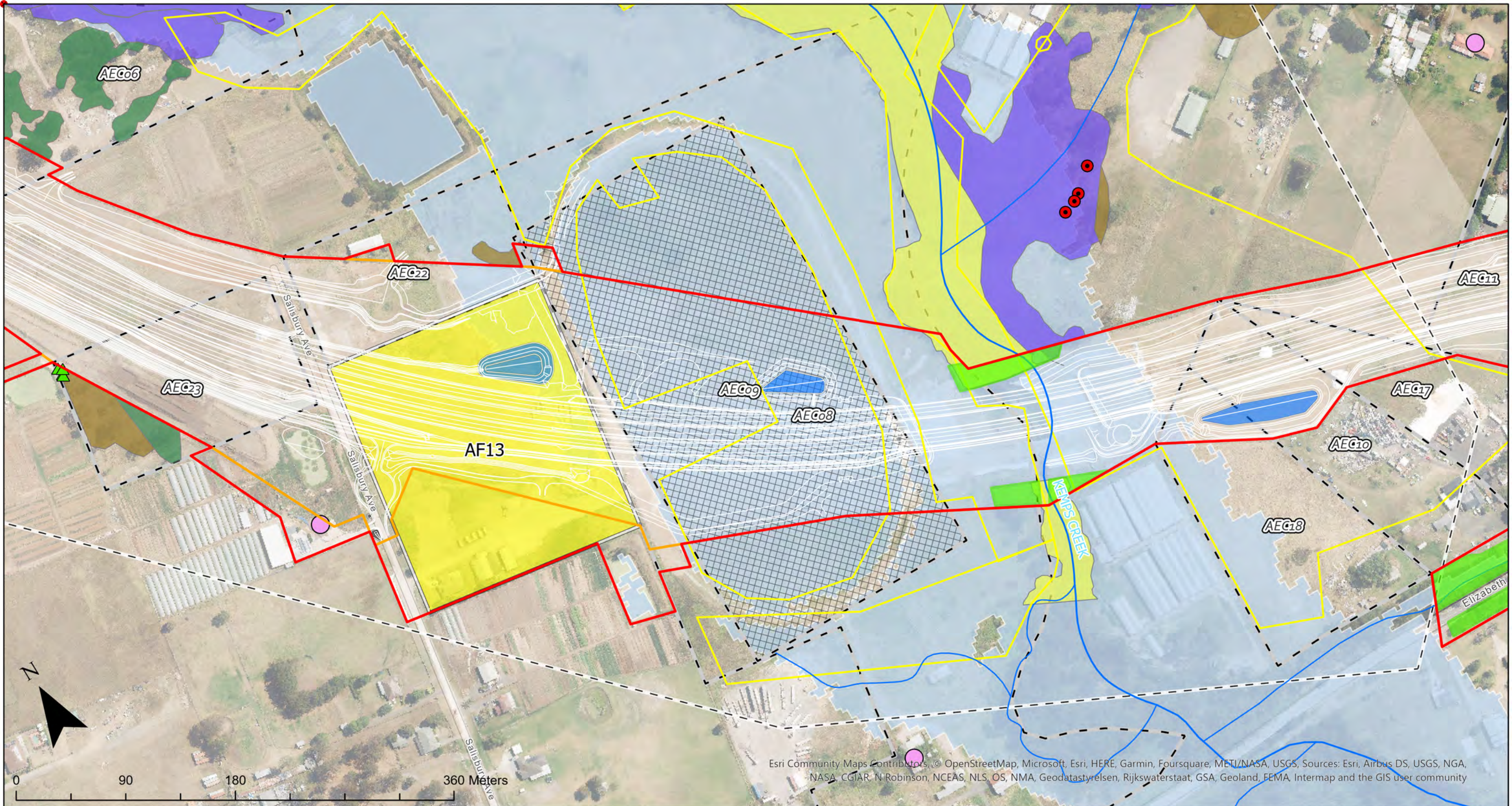


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PROJECT NAME: M12 CENTRAL

SENSITIVE AREA PLANS





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M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Dillwynia tenuifolia

Habitat Trees

Aboriginal heritages sites complex (potential area of sensitivity)

Aboriginal Heritage sensitive area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Area of Environment Concern

Potential Areas Of Fill

Flood Prone Lane (100yr ARI)

Residential

Cumberland Plain Woodland in the Sydney Basin Bioregion

River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions

Shale Gravel Transition Forest in the Sydney Basin Bioregion

Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions

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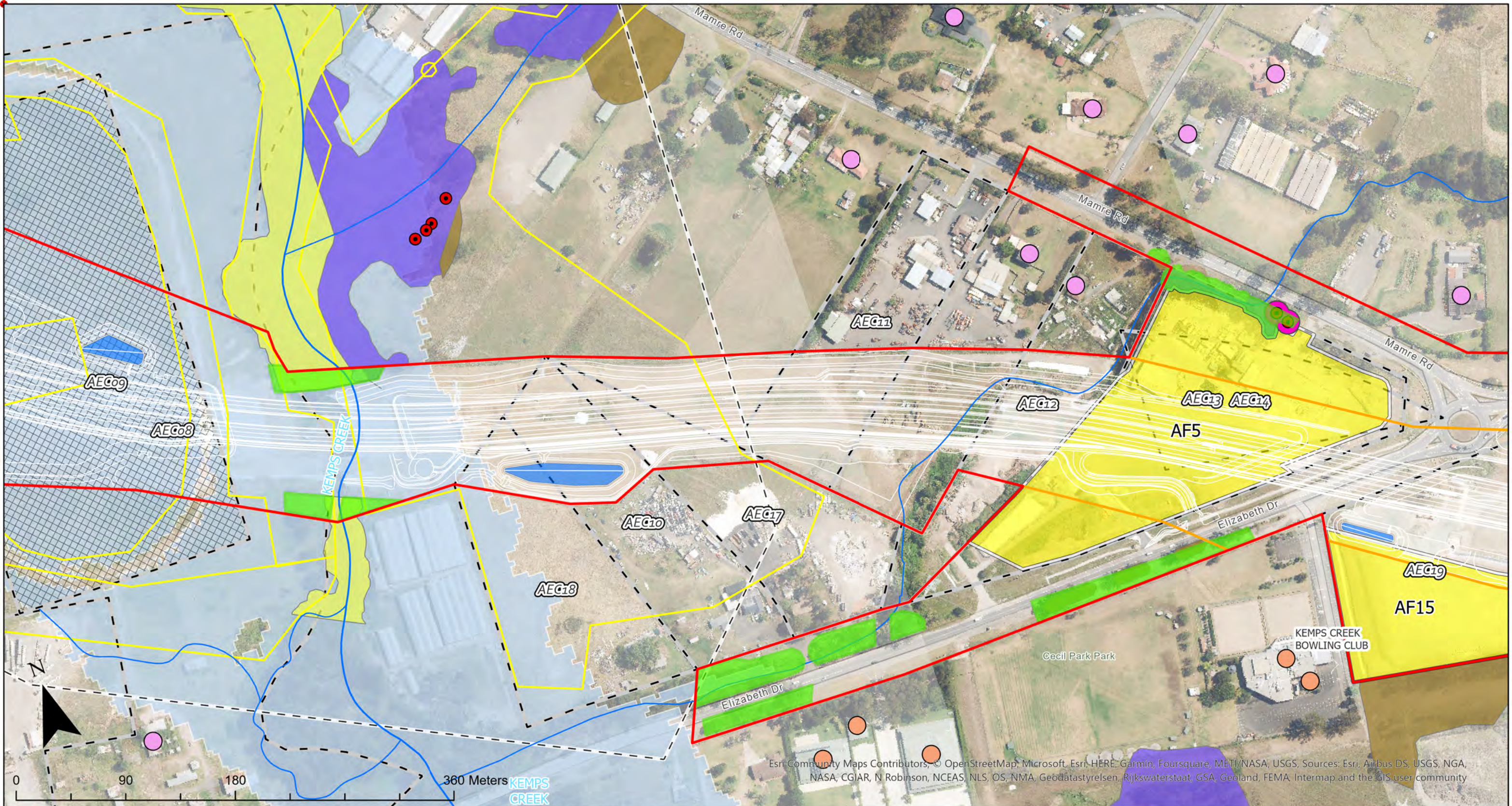
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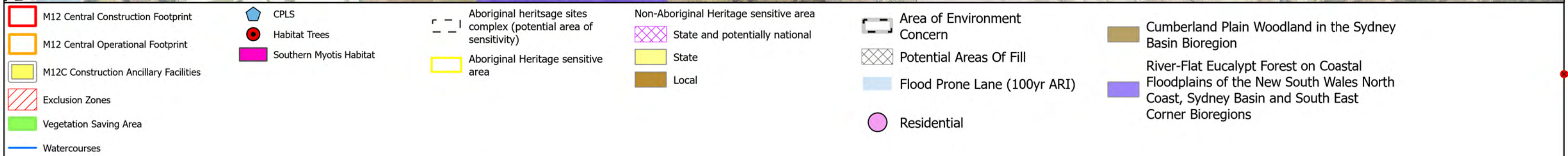
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M12 Central Construction Footprint	Habitat Trees	Aboriginal heritages sites complex (potential area of sensitivity)	Non-Aboriginal Heritage sensitive area State and potentially national	Area of Environment Concern	Cumberland Plain Woodland in the Sydney Basin Bioregion
M12 Central Operational Footprint	Southern Myotis Habitat	Aboriginal Heritage sensitive area	State	Potential Areas Of Fill	River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions
M12C Construction Ancillary Facilities			Local	Flood Prone Lane (100yr ARI)	Swamp Oak Floodplain Forest of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions
Exclusion Zones				Residential	
Vegetation Saving Area					
Watercourses					

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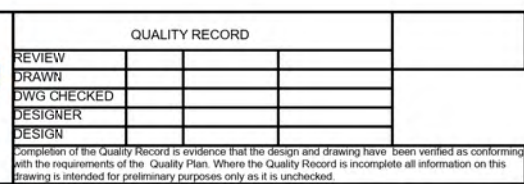




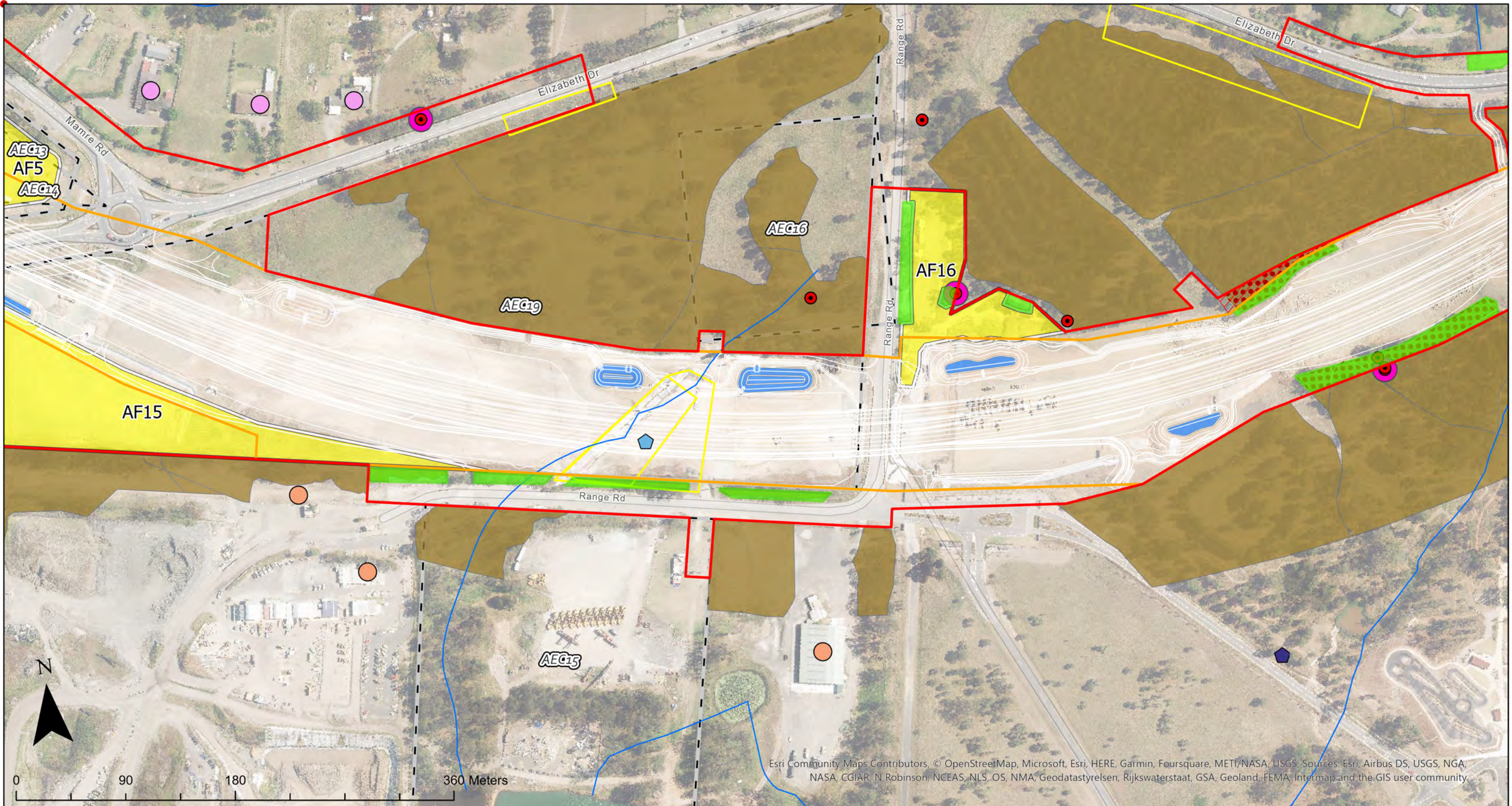


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	M12 Central Construction Footprint		CPLS		Aboriginal Heritage sensitive area		Non-Aboriginal Heritage sensitive area		Area of Environment Concern		Cumberland Plain Woodland in the Sydney Basin Bioregion
	M12 Central Operational Footprint		Varied Sittella		Southern Myotis Habitat		State		Potential Areas Of Fill		
	M12C Construction Ancillary Facilities		Habitat Trees		Local				Flood Prone Lane (100yr ARI)		
	Exclusion Zones		status						Residential		
	Vegetation Saving Area		Grey Headed Flying Fox Habitat								
	Watercourses										

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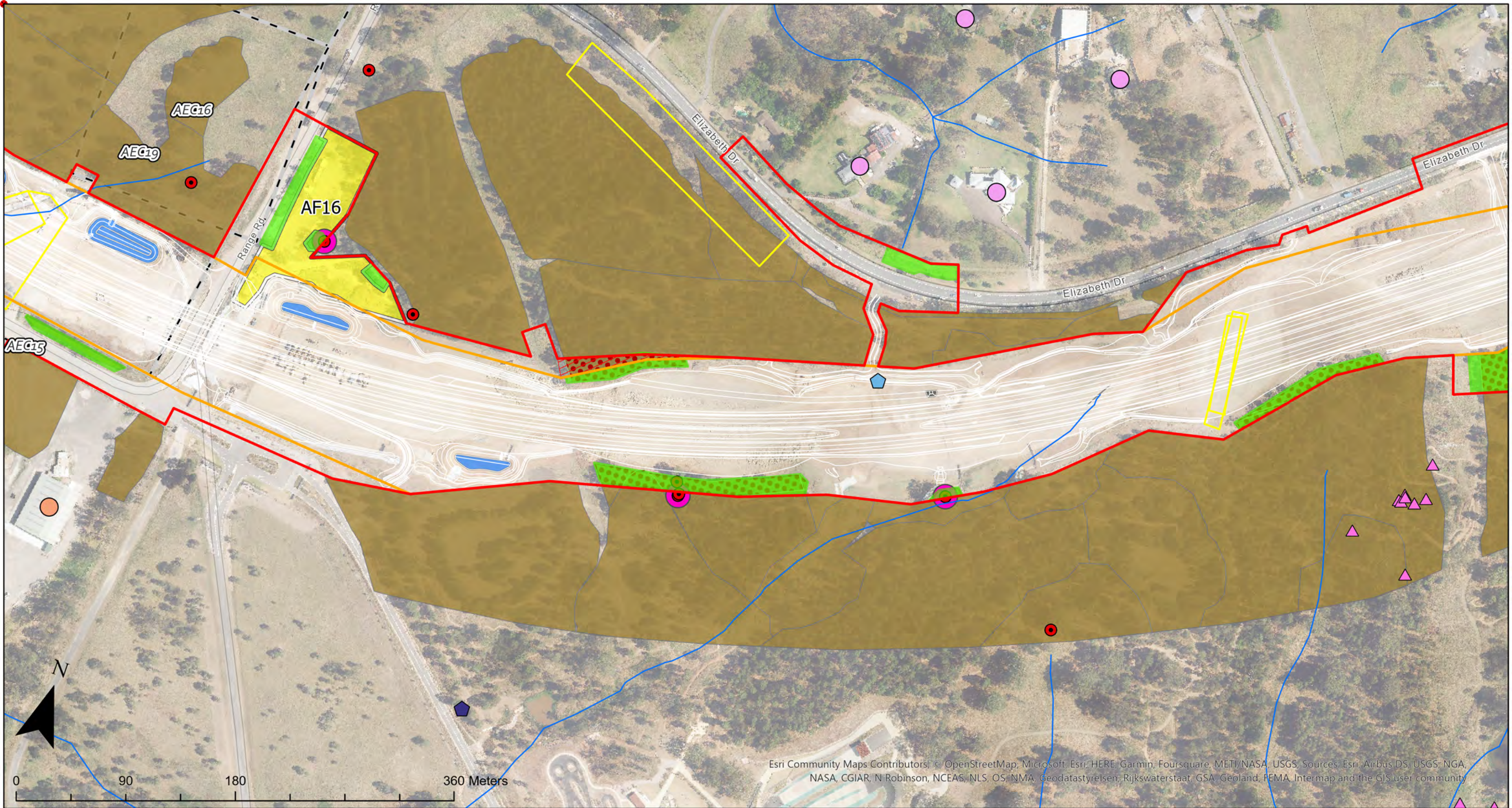
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M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Grevillea juniperina

CPLS

Varied Sittella

Habitat Trees

Southern Myotis Habitat

status

Grey Headed Flying Fox Habitat

Aboriginal Heritage sensitive area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Area of Environment Concern

Potential Areas Of Fill

Flood Prone Lane (100yr ARI)

Residential

Cumberland Plain Woodland in the Sydney Basin Bioregion

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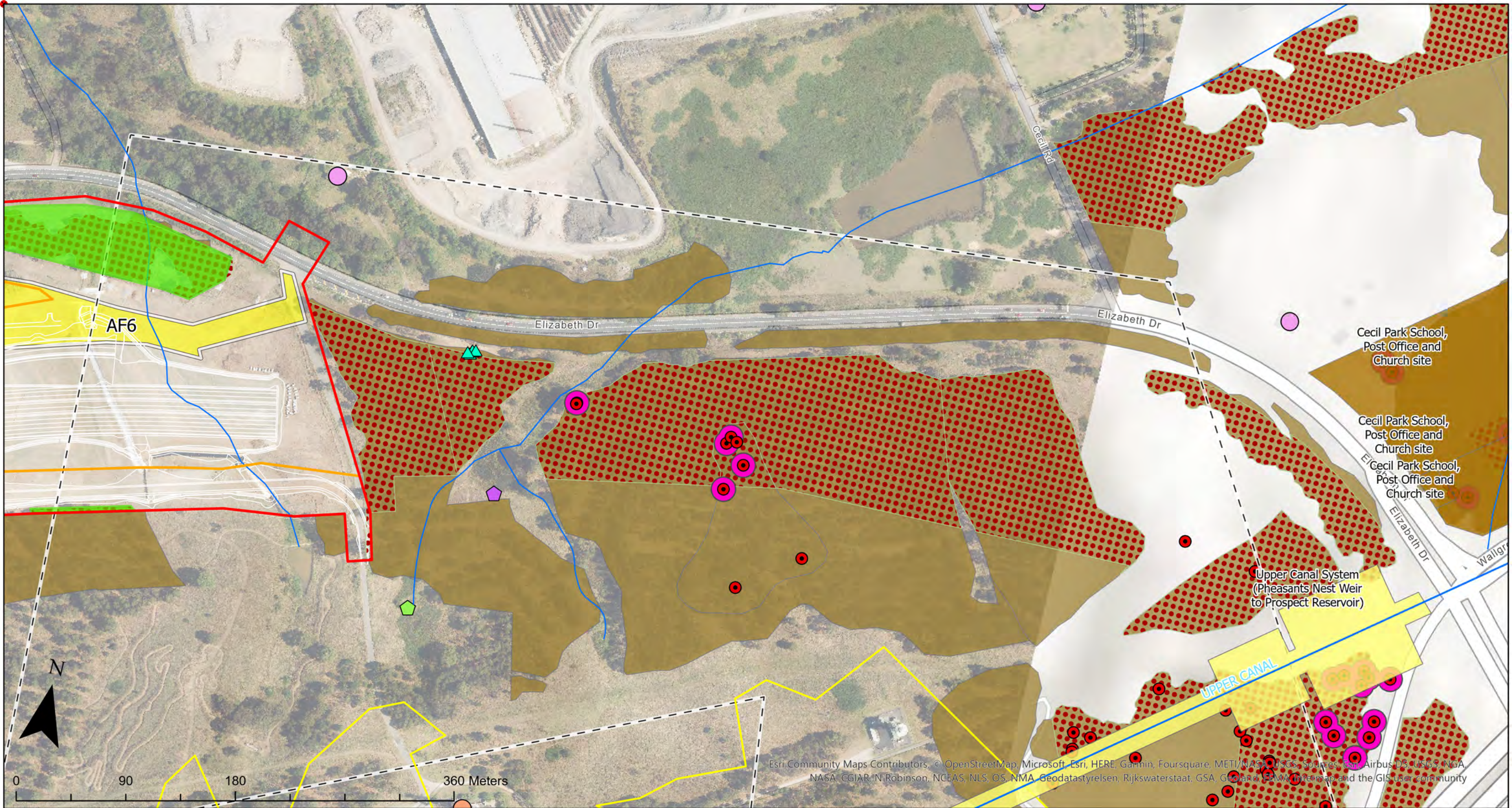












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M12 Central Construction Footprint

M12 Central Operational Footprint

M12C Construction Ancillary Facilities

Exclusion Zones

Vegetation Saving Area

Watercourses

Pultenaea parviflora

Eastern Bentwing-bat

GHFF

Habitat Trees

Southern Myotis Habitat

status

Grey Headed Flying Fox Habitat

Aboriginal heritages sites complex (potential area of sensitivity)

Aboriginal Heritage sensitive area

Non-Aboriginal Heritage sensitive area

State and potentially national

State

Local

Area of Environment Concern

Potential Areas Of Fill

Flood Prone Lane (100yr ARI)

Residential

Cumberland Plain Woodland in the Sydney Basin Bioregion

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# Appendix A7

## M12 Environmental Incident Classification and Reporting





M12 Motorway – Central

January 2025

## Document control

<b>File Name</b>	M12 Central CEMP Appendix A7
<b>Title</b>	M12 Central CEMP: Appendix A7 M12 Environmental Incident Classification and Reporting
<b>Document Number (Teambinder)</b>	M12CCO-SYW-ALL-EN-PLN-000003

## Approval and authorisation

Plan reviewed by:	Plan endorsed by:
	
Seymour Whyte Environmental Site Representative	Seymour Whyte Project Manager
18/01/2025	18/01/2025
	

## Revision history

Revision	Date	Description
A	18/02/2022	First draft for TfNSW review
B	29/04/2022	Updated to respond to TfNSW comments
C	20/06/2022	Updated to respond to TfNSW comments
D	27/07/2022	Updated to respond to TfNSW comments
E	17/08/2023	Updated in response to OCEMP update.
F	18/01/2025	Updated in response to OCEMP update

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## Definitions

All terminology in this Procedure is taken to mean the generally accepted or dictionary definition with the exception of the following terms which have a specifically defined meaning. Acronyms are as per the OCEMP.

Term	Definition
Environmental event	A report-only event, non-compliance, regulatory action or environmental incident
Environmental incident ( <i>as per the TfNSW Environmental Incident Procedure</i> )	An environmental incident is an event or set of circumstances, as a consequence of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur. Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items and adverse community impacts. An unexpected find that is not managed in accordance with relevant procedures / guidelines is also considered an environmental incident
Investigation	The process by which the cause(s) of an environmental incident is examined and identified.
Non-compliance ( <i>as per the TfNSW Environmental Incident Procedure</i> )	A failure to comply with any condition of approval, environmental assessment safeguard / mitigation measure, licence condition, permit or any other statutory approval relevant to the activity and/or area where the activity occurs
Notifiable event	Any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify a regulatory authority.
Pollution	Pollution (including air pollution, water pollution, noise pollution and land pollution) as defined in the dictionary to the POEO Act
Pollution incident	Has the same meaning as defined in the dictionary to the POEO Act. NB: a pollution incident as defined in the POEO Act does not include an incident or a set of circumstances involving only the emission of noise.
Regulatory action	any formal regulatory response from an environmental regulator including but not limited to penalty notices, clean-up notices, prevention notices, official cautions, show cause notices and formal warnings.
Report-only event	An environmental incident or unexpected find resulting from circumstances outside the scope of controls and of an activity.
Significant incident	An environmental incident that is likely to receive a classification of C3, C2 or C1, OR the history of the project, past performance and/or previous regulatory interest, indicate the project is likely to receive a penalty notice or be subject to prosecution, and therefore requires escalation to the Secretary and other TfNSW senior management.
Unexpected find	An unexpected discovery such as a heritage item, threatened species, contamination, asbestos or hazardous substance.

# 1 Introduction

The M12 Environmental Incident Classification and Reporting Procedure (the Procedure) is based upon the TfNSW Environmental Incident Classification and Reporting Procedure and amended to ensure applicability to the M12 Motorway Project (the Project) and associated State and Federal approvals.

## 1.1 Purpose

The Procedure aims to ensure that all personnel employed to work on the Project understand how to classify, respond to and report environmental incidents that occur as a result of Project activities. The purpose of this Procedure is to set out the process to be followed if, during an activity being carried out, there is:

- A report-only event
- A non-compliance
- Regulatory action received
- An environmental incident
- An incident as defined under the State Infrastructure Approval
- An incident affecting protected matter(s) or non-compliance with the Federal Approval.

The Procedure sets out the steps for the:

- Identification
- Classification
- Reporting.

## 1.2 Scope

The Procedure is applicable to all Project activities where report-only events, non-compliances, regulatory action and environmental incidents may occur. The requirements of the Procedure must be communicated to all Project personnel (e.g. during inductions) who undertake those activities.

This includes (but is not limited to):

- Activities undertaken by contractors on behalf of TfNSW
- Temporary activities, such as preliminary investigations (e.g. geotechnical and environmental surveys)
- Construction and maintenance of TfNSW assets
- Activities at TfNSW properties and facilities.

Guidance on management responses and corrective actions required following environmental incidents and non-compliances, are detailed in the Overarching Construction Environmental Management Plan (OCEMP) and will be addressed by those with responsibility for the activity that caused the incident or non-compliance.

It is noted that the TfNSW E&S Branch is available to provide advice on appropriate responses and corrective actions in relation to individual incidents or non-compliances.

## 2 Emergency Preparedness and Response

Emergency planning and awareness training will be undertaken for construction based upon this Procedure. All site personnel will be inducted on the incident management process detailed herein. The following equipment will be available to site personnel to utilise in the event of an incident:

- Protective gloves for certain types of corrosive chemicals
- Other personal protective equipment required for the handling of hazardous chemicals and radioactive substances
- Spill kits
- Stormwater drain guards
- Alarms for when there are issues with processes
- Firefighting equipment
- Up-to-date safety data sheets for any chemicals or fuels used or stored at the premises
- Hard hats for designated 'emergency controllers'
- Eye-wash stations.

The locations of the equipment will be detailed in the site induction. Relevant personnel will be appropriately trained on the use of all equipment. The procedure to following an event of an incident is detailed in Figure 2-1.

## INCIDENT RESPONSE

**STOP** the work immediately and **CHECK** for danger.

**DELEGATE** Senior member of the team present when an incident occurs is to take charge and be the Emergency Controller and delegate the main assisting roles of the emergency response.

**CONTACT** Site Emergency Response Team and await further assistance if this is required.

**CONTACT** emergency services (000) If an incident presents an immediate threat to human health or property

**WEAR** appropriate PPE.

**CONTROL** the source of the incident e.g. stop dust emitting activity, right an upturned drum

**ELIMINATE** sources of danger

**CONTAIN** the incident e.g. use earth or sand bunds to control spills.

**CHECK** the incident does not have the potential to cause further harm (e.g. check spill has not reached any nearby watercourse / sensitive areas)

**INTERNAL NOTIFICATION** of the incident to the TfNSW Environmental Officer  
External notification and reporting requirements detailed in the "Reporting Process Flowchart"

**INVESTIGATE** – undertake / cooperate with incident investigation

**REPORT** – prepare incident report

**TRAIN AND TEST** – brief all relevant staff on investigation findings and lessons learnt. Update procedure with finding and retest

Figure 2-1: Incident response Process

## 2.1 Emergency and key contacts

The TfNSW Environment and Sustainability Manager is the first point of contact for enquiries relating to environmental incidents. Current contacts for relevant M12 Central personnel are provided in Table 2-1.

Table 2-1: Emergency and key contacts

Position / Organisation	Name	Phone
EPA pollution hotline	n/a	131 555
Fire and Rescue NSW	n/a	000 (for pollution incidents that present an immediate threat to human health or property)  1300 729 579 (for pollution incidents that do not present an immediate threat to human health or property)
NSW Health – South Western Sydney Local Health District	n/a	(02) 8738 5755
SafeWork NSW	n/a	131 050
Penrith City Council	Ari Fernando	02 4732 7569
Liverpool City Council	Charles Waife	0417 175 763
24 hour community information line	n/a	1800 517 155
Project Manager – East	Kurt Bridde	0428 685 863
Project Manager – Central	Easwaran Veeragathipillai	0437 239 383
Project Manager – West	Kandiah Mahendran	0438 190 969
TfNSW Project Director, M12	Deanne Forrest	0409 838 479
TfNSW Deputy Project Director, M12	Jeffrey Gilham	0455 068 886
TfNSW Utilities Manager	Daniel Farrugia	0491 212 422
TfNSW Environment and Sustainability Manager	Daniel Saunders	0475 605 723
TfNSW M12 Community and Stakeholder Engagement Representative	Amanda Keating	0429 388 533
TfNSW M12 WHS Partner	Rory Grieves	0482 972 378
TfNSW Environment Officer	Jim Steen	0439 439 570
TfNSW Sustainability Advisor	Kalyani Wakhare	0403 564 070



Position / Organisation	Name	Phone
Department of Planning and Environment	Post-Approval: Grant Brown Senior Compliance Officer: Damien Smith	02 9274 6469 0403 291 191
Sydney Metro – Western Sydney Airport	Mark Rivet	0448 603 183
University of Sydney	David Schofield	9563 6804
Western Sydney International Airport	Richard Longman	0439 994 506
Seymour Whyte Project Manager	Peter Toma	0437 555 676 24 hour contact in an emergency
Seymour Whyte Construction Manager / Superintendent	Frank Callanan	0448 968 722
Seymour Whyte Environmental Site Representative	Tom Bath	0447 491 159 24 hour contact in an emergency
Seymour Whyte Site Safety Representative	Peter Lawrence	0445 777 352
Seymour Whyte Community Relations Manager	Jennifer Gatt	0402 063 586

## 2.2 Accountabilities

Table 2-2: Key accountabilities for implementing this Procedure

Requirement	Detail
Seymour Whyte Project Director (or delegate)	Incident Controller responsible for implementation of this plan during significant environmental incidents.
TfNSW Environment Director	Oversee compliance with the procedure and make the final determination on the classification of all environmental incidents, report-only events and non-compliances
TfNSW Environment reporting team	Recording of all environmental incidents, report-only events, non-compliances and regulatory action, confirm / amend the classification of environmental incidents, report-only events and non-compliances in accordance with section 3.1 and monitor compliance with the Procedure
TfNSW Executive Director Environment and Sustainability	Make determinations on whether an environmental incident will be considered a Significant Incident (see section 3.1.2). Assume the role of Information Distributor when a Significant Incident has occurred (see Appendix A).
Observer of environmental incident, report-only event, non-compliance or regulatory action	Immediately report in accordance with this Procedure

Requirement	Detail
Person/s responsible for environmental incident, report-only event, non-compliance or regulatory action	Report and respond in accordance with this Procedure
Project Managers	Provide appropriate resources to respond to an environmental incident, report-only event, non-compliance or regulatory action in accordance with this Procedure
Environmental Site Representative	<p>Notify TfNSW and relevant authorities in the event of an environmental incident and manage close-out of these</p> <p>Stop activities where there is an actual or immediate risk of harm to the environment, or to prevent environmental non-conformances, and advise the Project Manager, Construction Manager and Superintendent</p> <p>Report and respond in accordance with this Procedure</p>

## 3 Requirements

### 3.1 Incident classification

This Procedure is applicable to a range of environmental incidents, report-only events, non-compliances and regulatory action that may occur during Project activities. Each of these events and their reporting requirements are described in the following sections.

Personnel using this Procedure should consider the definitions of each of these events when reporting. Definitions are provided in the definitions table at the beginning of this Procedure.

Note that a set of circumstances may be both a non-compliance and an environmental incident. An environmental incident could also result in regulatory action.

#### 3.1.1 Environmental incidents

Environmental incident classifications are described in Table 3-1. The classification system is aligned to the consequence levels (C6 – C1) from the [TfNSW Enterprise Risk Management Standard](#) and considers the key risk areas of:

- Environment
- Reputation and Integrity
- Regulations and Compliance.

The appropriate consequence level for each of the three key risk areas will be recorded for each incident, but only the highest recorded consequence level will be used as the incident classification for reporting purposes.

Note that not all criteria described for each consequence level in Table 3-1 need to be met in order to assign an incident classification – the most appropriate criteria should be considered when determining the consequence level for each key risk area for each incident.

Table 3-1: Environmental incident classification

Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
Environment	No appreciable changes to environment.	Change from existing conditions that can be rectified immediately (< 1 day) with available resources.	Short-term (< 1 year) and/or well-contained environmental impact. Minor remedial actions probably required.	Short to medium term (between 1 and <5 years) environmental impact. Considerable remedial actions probably required.	Medium-term (>5 years) environmental impact. Extensive remedial actions probably required.	Long-term (>10 years) large-scale environmental impact. Extensive and ongoing remedial actions probably required.
Reputation and integrity	Single negative article in local media. Limited social media commentary. Goodwill, confidence and trust retained. Confined to the Branch. Local council may want to discuss.	Series of negative articles in local media (District / electorate based adverse media). Some social media commentary. Confidence remains - minor loss of goodwill. Confined to Branch but requiring notification to Division. Council requires written explanation. Recoverable with little effort or cost.	Extended local media coverage with some broader Regional media coverage. Extended negative social media coverage. Confidence and trust of stakeholders dented (recoverable at modest cost within existing budget and resources). Division formal response needed to State	State media coverage, short term negative national media coverage. Widespread social media coverage Confidence/trust impaired. Project/activity credibility under question. TfNSW and/or Ministers Department requires update.	Sustained negative State media coverage. Regular 'talk-back' programs questioning credibility and capability. Confidence and trust are severely damaged. Widespread negative social media coverage. Regular updates demanded by Minister. Stakeholders withdraw their support	Sustained, high profile media attention at National level. Material change in the public perception of the Agency. Extensive negative social media coverage Confidence and trust non-existing. Government forced to reverse decision. Stakeholders are actively campaigning



Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
		Some continuing scrutiny/attention.	Government/Regulator.		recoverable at considerable cost, time and staff effort.	against the organisation.
Regulations and compliance	Low-level/Technical non-compliance with legal and/or regulatory requirement or duty by individuals or TfNSW- not reportable. Minor non-compliance to a low impact contract clause – little or no interest by either party to pursue or rectify.	Non-compliance with whole or significant aspects of Government policy not reportable but requiring internal activity to put in place. Formal investigation and/or formal notification to regulator. Minor breach of contract by either party rectified through local management discussion.	Non-compliance with key Government policy - reportable and/or explanation required – need to put in place as soon as possible. Non-compliance – key obligation. Formal notification to regulator. Agency on notice. Breach of contract by either party rectified at Branch level management discussion. Small fine and no disruption to services.	Technical non-compliance with a minor Government Policy - not reportable. Low level non-compliance. Technical non-conformance. Minor non-compliance to a low impact contract clause – little or no interest by either party to pursue or rectify. Substantial fine and no disruption to services.	Non-compliance with high profile, outward facing Government policy or Ministerial decree - immediately reportable to Government body (e.g. Treasury) and action to put in place required immediately (high priority). Continuous breach resulting in prohibition notices. Breach of significant, key aspects of contract by either party leading to lodgement (threat) to sue and recompense at severe financial levels	Non-compliance with high profile Government policy or Ministerial decree - immediately reportable to Ministerial level requiring actions to put in place immediately (high priority) and progress to be reported to the Minister on an agreed and appropriate schedule. Litigation and potentially imprisonment. Loss of Operating licenses. Continued breach cannot be tolerated. Major contract breach by either



Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
					Cessation of contract may occur. Large fines as a result of non-compliance. Licence or accreditation restricted or conditional affecting ability to operate.	party leading to significant litigation and financial costs Total breakdown and cessation of contract. Criminal prosecution as a result of non-compliance.

### 3.1.2 Significant environmental incidents

Significant Incidents are environmental incidents that are serious in nature and have significant consequences warranting escalation to TfNSW senior management.

An environmental incident is to be defined and treated by the TfNSW Environment Manager as a potential Significant Incident if it meets one or both of the following:

- The severity of the incident is likely to be classified as C3, C2, or C1 in accordance with Table 3-1
- The history of the Project, past performance and/or previous regulatory interest, indicate the Project is likely to be the subject of a penalty notice or prosecution.

Potential Significant Incidents are escalated by TfNSW to the Executive Director Environment and Sustainability, who will determine whether the incident is deemed to be a Significant Incident and require further escalation to the Secretary and other senior management, to ensure they are aware of the incident and can implement or authorise any required responses.

### 3.1.3 Incidents affecting protected matter(s)

In the Commonwealth Approval, incident affecting protected matter(s) means any event which has the potential to, or does, impact on one or more protected matter(s), other than as authorised by the Commonwealth Approval. Protected matter means Matters of National Environmental Significance (MNES) as outlined in Part 3 of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). These include:

- World Heritage sites
- National Heritage sites
- Wetlands of International Importance (RAMSAR Wetlands)
- Listed threatened species and communities
- Listed migratory species
- Marine environments.

Should an incident directly or indirectly impact protected matter(s) identified by the EPBC Act, the Procedure outlined in the Procedure outlined below should be followed.

### 3.1.4 Report-only events

Examples of report-only events include:

- Environmental incidents caused by weather events that are beyond the design capacity of environmental controls and/or mitigation measures in accordance with project specific requirements
- Environmental incidents caused by persons or entities not associated with an activity being undertaken by the Project
- Pre-existing conditions not associated with an activity being undertaken by the Project
- Unexpected finds that are managed in accordance with relevant procedures / guidelines.

Report-only events can be considered to be unavoidable and so not reflecting the performance of a site, and will not be included in performance reporting. However, the response to a report-only event should be taken into account when considering site performance, as a deficient or inappropriate management response could result in a non-compliance and/or an environmental incident.

Where a report-only event relates to an unexpected find and the same issue can then reasonably be expected to be found at the same location in future, additional finds from that location need not be reported.

## 3.2 Reporting Process

### 3.2.1 Standard notification and reporting

The standard reporting process for all environmental incidents, significant environmental incidents, report-only events, non-compliances and regulatory action is detailed in Figure 3-1.

Where the reporting process requires submission of a written report to TfNSW, the person making the report must use the Environmental Event Reporting Form (624/400).

#### Initial notification

Advise TfNSW Environment staff and the Project Manager immediately on becoming aware of an environmental event. Initial notification of the environmental event must be submitted to TfNSW within 24 hours of the incident. The Environmental Event Reporting Form must be completed and submitted within 48 hours for environmental incidents, non-compliances and report-only events.

Information included in reporting must be factual and accurate.

For the initial 24-hour email notification, the following information must be provided:

- Date of event
- Project / site name
- Type of event that has occurred (i.e. environmental incident, incident and non-compliance, non-compliance, report-only or regulatory action)
- Description of the event
- Quantity / volume
- Immediate response actions that were implemented
- Notification/s undertaken.

In the case that regulatory action is received relating to a previously reported environmental incident, non-compliance or report-only event, reference to the relevant event must be made in the report for the regulatory action.

#### Environmental Event Reporting Form

All Environmental Incident Reporting Forms must be populated, signed and submitted electronically (never printed / signed / scanned etc.) to enable TfNSW to electronically capture the information entered in the form. Completed Environmental Event Report Forms should be submitted by the Environmental Site Representative to the Environment Operations mailbox:

- [envops@transport.nsw.gov.au](mailto:envops@transport.nsw.gov.au)

It is essential that a clear and consistent subject line convention is used to allow tracking of correspondence about each incident. All emails about an incident between all parties should structure the subject line as follows:

- Category X - project name / incident location - date
- For example, Category 1 – Main Road Upgrade – dd/mm/yy.

Where information cannot be gathered within the timeframes set out in this Procedure, the incident form should be submitted to the mailbox as a 'draft', whether or not the information contained is fully completed.



- For example, Category 1 – Main Road Upgrade – dd/mm/yy (DRAFT).

The ESR should then request further information from the person making the report, and the final report should be submitted within the next 24 hours.

### 3.2.2 NSW Infrastructure Approval

In addition to the reporting requirements outlined in Section 3.2.1, an incident that meets the criteria outlined in Schedule 1 of the Infrastructure Approval must also be reported in accordance with NSW CoA A44 and A45.

An 'incident' as defined by the State Infrastructure Approval includes 'an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance'.

Material harm is defined within the State Infrastructure Approval as harm that:

1. Involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or
2. Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).

TfNSW are responsible for notifying the Planning Secretary of an incident in writing via the Major Projects Website as soon as possible and no later than 12 hours after becoming aware of an incident.

In accordance with Appendix A of the NSW Infrastructure approval:

1. Additional written incident notification addressing the requirements set out below must be submitted to DPHI via the Major Projects website within seven days after becoming aware of an incident. The incident notification must include the following:
  - a. Identify the CSSI and application number
  - b. Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
  - c. Identify how the incident was detected
  - d. Identify when the Proponent became aware of the incident
  - e. Identify any actual or potential non-compliance with conditions of approval
  - f. Describe what immediate steps were taken in relation to the incident
  - g. Identify further action that will be taken in relation to the incident
  - h. Identify a project contact for further communication regarding the incident.
2. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, TfNSW must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested:
  - a. A summary of the incident
  - b. Outcomes of an incident investigation, including identification of the cause of the incident
  - c. Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
  - d. Details of any communication with other stakeholders regarding the incident.

### 3.2.3 Commonwealth incident reporting

Should an event occur that has the potential to, or does impact Matters of National Environmental Significance (MNES) other than as authorised by the Commonwealth Approval, the Department of Climate Change, Energy, Environment and Water (DCCEEW); formerly Department of Agriculture Water and Environment (DAWE) will require notification as outlined in Commonwealth CoA 11 and 12. MNES relevant to construction are outlined in Section 4.2 of the CFFMP and include:

- Grey-headed Flying-fox habitat
- Southern Myotis
- Sydney Bush Pea (*Pultenaea parviflora*)
- Spiked Rice flower (*Pimelea spicata*).

In the event of an incident that has the potential to impact or does impact a protected matter other than as authorised by the Commonwealth approval Seymour Whyte will verbally notify the Environmental Representative (ER) and the TfNSW Environment and Sustainability Manager (or delegate) immediately.

The ESR will submit an Environmental Event Report Form as outlined in Section 3.2 of this Procedure.

In accordance with the Commonwealth Approval, TfNSW must notify DCCEEW in writing as soon as practicable and no later than 2 business days after becoming aware of the incident. The notification must specify:

- Any condition which is or may be in breach
- A short description of the incident affecting protected matters and/or non-compliance
- The location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.

TfNSW will be responsible for providing DCCEEW with further details of the incident as soon as practicable and no later than 10 business days after becoming aware of the incident.

The details to be provided to DCCEEW include:

- Any corrective action or investigation which TfNSW has already taken or intends to take in the immediate future
- The potential impacts of the incident affecting protected matters or non-compliance
- The method and timing of any remedial action that will be undertaken by TfNSW.

### 3.2.4 Other TfNSW notification requirements

When reporting in accordance with this Procedure, TfNSW project management teams should also undertake the following internal notifications as appropriate:

- Corporate Communications / Media for any environmental incidents, report-only events, non-compliances and regulatory action that have potential for negative community or media attention;
- Legal Branch, for any environmental incidents, report-only events, non-compliances and regulatory action that could result in a (further, in the case of the latter) regulatory response against TfNSW. In these instances, limit written commentary on the incident by all staff, including emails;
- Safety Branch for any incidents that involve actual or potential risks to the health and safety of workers or the general public.

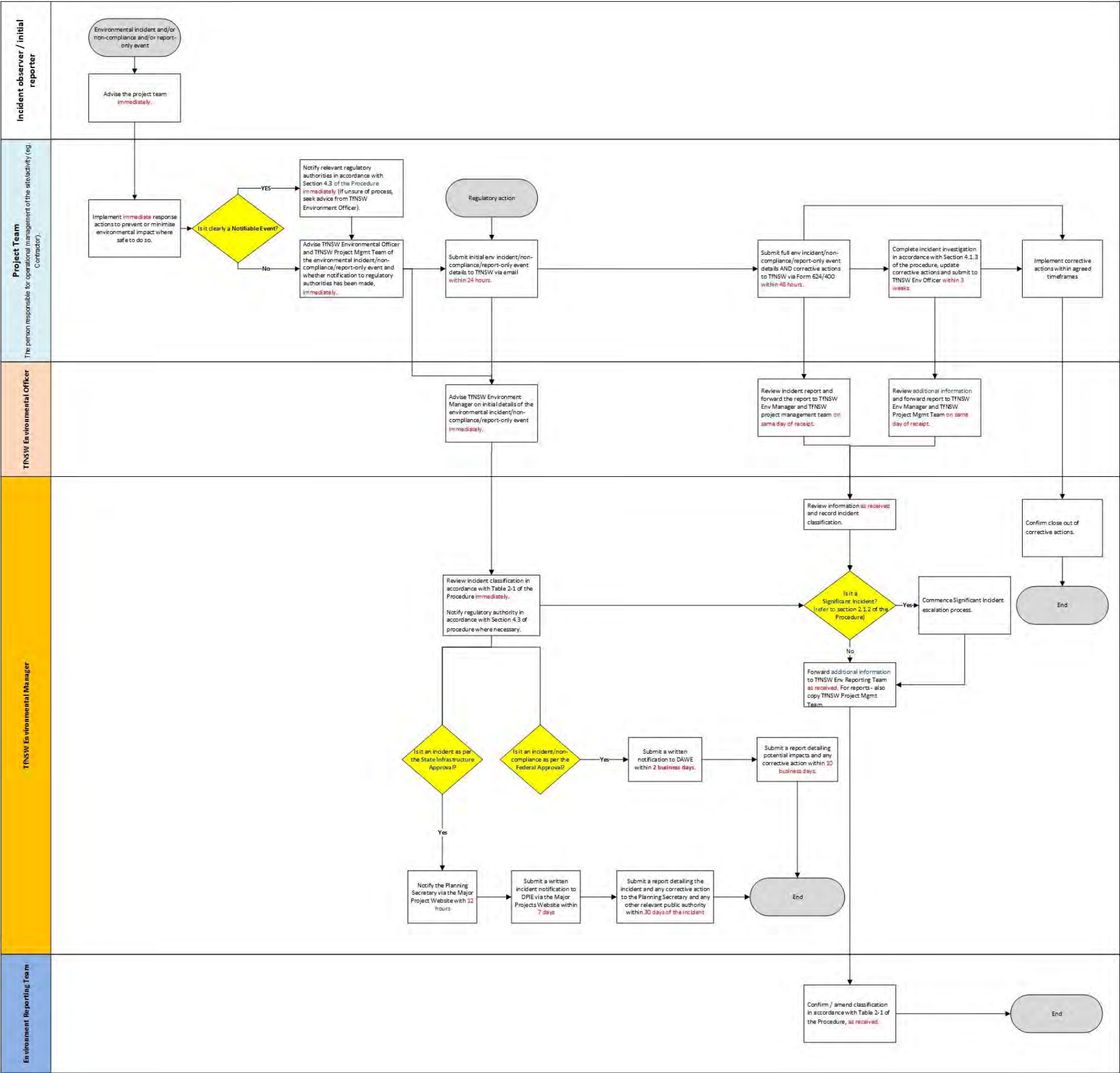


Figure 3-1: Reporting Process

### 3.3 Notifiable incidents – POEO Act

A notifiable event is any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify an authority.

The key notification requirements are described in Section 3.3. Note each statutory requirement to notify may specify a particular person who is responsible to make the notification as well as the timing of when this must occur.

#### 3.3.1 Material Harm pollution incidents

Under Part 5.7 of the POEO Act, there is a duty to immediately notify (i.e. promptly and without delay) each relevant authority (refer to Section 4.1.2) of a pollution incident where material harm to the environment is caused or threatened.

The POEO Act states that a pollution incident should be considered Material Harm if:

- “(i) *it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- “(ii) *it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000”*

Material Harm only relates to pollution incidents. Other environmental incidents, such as conservation, heritage and planning breaches, are not included in the definition of a pollution incident.

Material Harm pollution incidents require notification to the NSW Planning Secretary as required by NSW CoA A44 and A45.

#### 3.3.2 Determination of Material Harm

The determination on whether a pollution incident should be considered Material Harm should be made in accordance with Table 3-2.

Table 3-2: Determination of Material Harm pollution incidents

Project delivery	Material Harm determination
Activities undertaken by contractors	<p>The M12 project team will make the determination (and any associated notifications) on whether a pollution incident should be considered Material Harm. The relevant TfNSW Environment Manager or Environment Branch Director may contact the DES to assist in making an assessment of the incident, to aid the contractor in determining if the pollution incident should be considered Material Harm.</p> <p>Where TfNSW believes a pollution incident should be considered Material Harm but the contractor disagrees, TfNSW is required by law to notify EPA, NSW DPE and other relevant authorities. In this instance the DES or DE would make a determination on whether the incident should be notified by Transport for NSW as Material Harm. Transport for NSW would provide details of any notifications made to the contractor.</p>

Even if only limited information is available for a pollution incident being considered Material Harm, each relevant authority must be immediately notified with the information available and updates provided as soon as further relevant information becomes available.



In circumstances where there is doubt about the need to notify a pollution incident as Material Harm, Transport for NSW and its contractors should always err on the side of notification.

### 3.3.3 Notification of Material Harm pollution incidents

The relevant authorities that must be notified for a Material Harm pollution incident are listed in Section 4.1.2 and Table 3-3. It is important to note the order of notification and phone numbers to use can vary depending on the nature of the pollution incident, as detailed in Table 3-3 and Table 3-4.

All of the authorities listed (whether considered relevant or not) must be contacted for each Material Harm pollution incident to satisfy POEO Act requirements. Serious penalties apply to both individuals and corporations for failing to notify Material Harm pollution incidents:

- Maximum penalty for individuals - \$500,000
- Maximum penalty for corporations - \$2,000,000.

Table 3-3: Authorities to notify for Material Harm pollution incidents that present an immediate threat to human health or property

Order	Authority	Contact Number
1	Fire and Rescue NSW	000
2	NSW EPA environment line	131 555
3	Ministry of Health (via the local Public Health Unit)	Contact 1300 066 055 to be directed to the local Public Health Unit, or visit the <a href="#">NSW Health Website</a>
4	SafeWork NSW	131 050
5	The Appropriate Regulatory Authority, being either: <ul style="list-style-type: none"> <li>• Local council</li> <li>• DPHI</li> </ul>	Local council - contact Office of Local Government on 4428 4100, or visit the <a href="#">Office of Local Government website</a> Via the Major Projects Portal

Table 3-4: Authorities to notify for Material Harm pollution incidents that do NOT present an immediate threat to human health or property

Order	Authority	Contact Number
1	NSW EPA environment line	131 555
2	Fairfield City Council	02 9725 0222
3	Liverpool City Council	1300 362 170
4	Penrith City Council	02 4732 7777
5	Ministry of Health (via the local Public Health Unit)*	Contact 1300 066 055 to be directed to the local Public Health Unit, or visit the NSW Health Website
6	SafeWork NSW	131 050
7	Fire and Rescue NSW	1300 729 579
8	DPHI Thomas Minchin (Compliance Officer)	Via the Major Projects Portal or (02) 9995 6038 0436 682 790

### Relevant information to provide

Section 150 of the POEO Act provides the information that needs to be notified, being:

- The time, date, nature, duration and location of the incident
- The location of the place where pollution is occurring or is likely to occur, the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- The circumstances in which the incident occurred (including the cause of the incident, if known)
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- Other information prescribed by the regulations.

Only known information should be provided when notifying of a Material Harm pollution incident. If further information becomes known after the initial notification, that information must immediately be notified to all authorities in accordance with Section 150. The immediate verbal notification is to be followed by written notification to each relevant authority within seven days of the date on which the incident occurred.

Complying with these notification requirements does not remove the need to comply with any other legislative requirements for incident notification (e.g. requirements under the conditions of an EPL or the Work Health and Safety Act 2011).

Relevant information required for notification to DPHI in accordance with NSW CoA A44 and NSW CoA A45 is outlined in Section 3.2.2.

### 3.3.4 Summary of other regulatory agency notification requirements

Specific statutory requirements relating to the notification of environmental incidents to relevant regulatory agencies are summarised in Table 3-5. Additional requirements adopted by TfNSW are indicated in *italics*. Any notification to regulatory agencies should be indicated in the Environmental Event Report Form to confirm that any required notifications have been initiated.

Table 3-5: Regulatory agency notification requirements

Legislation / issue	Regulating authority	Section / requirement
<i>Commonwealth Aboriginal and Torres Strait Islanders Heritage Protection Act 1984</i>	<a href="#">DCCEEW</a>	Section 20 – requirement to notify the Minister of the discovery of Aboriginal remains.
<i>Contaminated Land Management Act 1997</i>	<a href="#">EPA</a>	Section 60 – requirement to notify if Transport for NSW activities have contaminated land or if Transport for NSW owns land that has been contaminated.
<i>Heritage Act 1977</i>	Environment and Heritage Group (as a part of NSW <a href="#">DCCEEW</a> )	Section 146 – requirement to notify the Heritage Council of the location of the relic once a relic has been discovered or located.
<i>National Parks and Wildlife Act 1974</i>	Environmental, Energy and Science (a part of NSW DPE)	Section 89A – requirement to notify the location of an Aboriginal object that is the property of the Crown.
<i>Protection of the Environment Operations Act 1997</i>	<a href="#">EPA</a> and other relevant authorities	Section 148 – requirement to immediately notify pollution incidents that cause or threaten Material Harm to the environment (see <a href="#">Section 5.1</a> )
	<a href="#">EPA</a>	<i>Pro-active reporting to the local EPA officer of offsite pollution incidents that occur as a result of Transport for NSW activities is encouraged as soon as practicable after the pollution incident occurs.</i>
<i>Rural Fires Act 1997</i>	<a href="#">NSW Rural Fire Service</a>	Section 64 – requirement to notify an appropriate fire officer of the inability to extinguish any fire burning during a bush fire danger period applicable to the land.
Incidents as defined under the NSW Infrastructure Approval or the Commonwealth Approval	DPHI Commonwealth DDCCEEW	NSW CoA A44 and A45 Commonwealth CoA 11 and CoA 12
Water supply catchment areas	Local water supply authority	If an environmental incident has the potential for unapproved impacts on a drinking water supply, the relevant water supply authority must be advised.

### 3.4 Requests for written reports from regulatory authorities

Should Seymour Whyte directly receive a request from a regulatory authority for a written report regarding an environmental incident, the TfNSW Environment and Sustainability Manager must be immediately contacted for advice. No further correspondence (including email) about the incident should be distributed either internally or externally until advice is received. The TfNSW Environment and Sustainability Manager will then assist the Contractor to:

- Assist in the investigation of the incident
- Provide legal advice to the Project

- Co-ordinate the preparation of the written response to the regulatory authority.



## 4 Significant incident escalation process

Where a TfNSW Environment Manager believes that a Significant Incident has occurred, they must immediately phone the relevant TfNSW Environment Director. The TfNSW Environment Director will consult with the TfNSW Executive Director Environment and Sustainability, who will determine whether the incident will be considered a Significant Incident. Once a Significant Incident has been determined, the escalation process will commence as outlined below.

### 4.1.1 Significant incident information management

Following determination of a Significant Incident, it is essential that there is fast, consistent and accurate reporting of information to the TfNSW senior management. As such, clear roles and responsibilities must be established in two key areas, as described in Table 4-1.

Table 4-1: Roles and responsibilities during a significant incident

Role	Who	Responsibilities
Information Controller	TfNSW Environment Manager (or relevant TfNSW Environment Officer in their absence)	<ul style="list-style-type: none"> <li>Liaise between the on-site TfNSW project management team and the Information Distributor (below)</li> <li>Be the single point of contact to provide information and updates about the status of the Significant Incident to the Information Distributor</li> </ul>
Information Distributor	TfNSW Executive Director Environment and Sustainability (or relevant TfNSW Environment Director in their absence)	<ul style="list-style-type: none"> <li>Identify the relevant members of the TfNSW Executive and other TfNSW senior management that will form the distribution group to be informed about the Significant Incident</li> <li>Consolidate information from the Information Controller, and distribute it to the distribution group</li> <li>Provide key ongoing updates to the distribution group as it becomes available</li> <li>Respond to enquiries from the distribution group, ensuring all members of the distribution group are copied into every response</li> </ul>

### 4.1.2 Parties to be notified

The Information Distributor must identify relevant TfNSW senior management from delivery and client divisions that will form the distribution group to be informed about the Significant Incident, including ongoing updates. Table A3 provides the key positions that must be included (at a minimum), depending on who is undertaking the activity. Depending on the type and location of the activity, there may be other areas of TfNSW that should be included in the distribution group.

The distribution group should all be notified concurrently in a single email that a Significant Incident has occurred. The email should be sent by the Information Distributor within five minutes of making the determination of the Significant Incident.

Table 4-2: TfNSW Distribution group to be notified of a Significant Incident

Position	Greater Sydney
Transport exec notification	<ul style="list-style-type: none"> <li>Secretary</li> </ul>
SER executive notification	<ul style="list-style-type: none"> <li>Deputy Secretary, Safety Environment and Regulation</li> </ul>
Client executive notification	<ul style="list-style-type: none"> <li>Deputy Secretary, Greater Sydney</li> <li>Executive Director, Community and Place</li> <li>Director Western Parkland City</li> </ul>
Delivery executive notification	<ul style="list-style-type: none"> <li>Deputy Secretary, Infrastructure and Place</li> <li>Head of Sydney Project Delivery</li> <li>Executive Director Western Sydney Project Office</li> </ul>
Project Team notification	<ul style="list-style-type: none"> <li>M12 Project Director</li> <li>M12 Deputy Project Director</li> <li>M12 Project Manager</li> <li>M12 Environment Manager</li> </ul>

### 4.1.3 Non-compliances

A non-compliance is a failure to comply with any condition of approval, environmental assessment safeguard / mitigation measure, licence condition, permit or any other statutory approval relevant to the activity and/or area where the activity occurs.

A non-compliance could also be an environmental incident.

### 4.1.4 Regulatory action

Regulatory action includes, but is not limited to:

- Prosecutions
- Penalty notices
- Clean up notices
- Prevention notices
- Official cautions
- Formal warnings
- EPA show cause notifications.

Copies of any regulatory action issued by an environmental regulator must be provided as part of the reporting that is undertaken in accordance with this Procedure.

## 5 Investigations

A root cause analysis investigation must be completed by the ESR for all environmental incidents with a classification of C1, C2 or C3, or any other environmental incidents or non-compliances as determined by TfNSW.

The scope of the investigation will be determined by the TfNSW Environment Officer or Environment Manager. The ESR must provide TfNSW with a final investigation report within three weeks of the environmental incident or non-compliance being identified. The report must include the minimum information described in Table 6-1.

Table 5-1: Investigation report

Element	Description
Sequence of events	The sequence of events that led to the incident or non-compliance
Findings	Given the sequence of events, what are the key findings of the investigation (i.e. what are the main causes of the incident or non-compliance).
Management methods	A record of the management methods to be changed and/or implemented to avoid the incident or non-compliance reoccurring.
Key learnings	Describe the key learnings from the investigation into the incident or non-compliance. Detail which learnings may be relevant to other transport projects.

## 6 Corrective actions

There are a variety of scenarios in which an environmental event may occur. It is important that corrective actions are:

- Specific to the incident that has occurred
- Meaningfully address the root cause(s) of the incident
- Designed to prevent incident reoccurrence.

Corrective actions could include (but are not limited to) the following:

- Physical works to install, augment or rectify controls or a site issue
- Testing and/or monitoring
- Review and improvement of construction methods or work practices
- Review and update of management plans, procedures or other tools
- Communication, training and awareness initiatives for workers.

In most cases it will not be sufficient to simply notify workers of correct systems / procedures (e.g. via toolbox talk). A review should be undertaken by the ESR following an incident or non-compliance to determine why the systems / procedures failed (or alternatively a formal investigation), and necessary changes made to ensure they do not fail in future. Site personnel should then be made aware of the changes and trained as necessary.

Immediate/short-term corrective actions including timeframes for completion must be clearly described in incident/non-compliance reporting. Updates about longer-term corrective actions including timeframes for completion can be provided to the TfNSW Environment Officer and TfNSW Project Management Team post submission of the incident/non-compliance report.



# Appendix A8

## TfNSW Environmental Work Method Statements (EWMS)

M12 Motorway - Central

January 2025

**Transport for New South Wales**



Transport  
for NSW

# Environmental Work Method Statement

Template

**# Delete this page prior to submission #**

**EWMS guidance notes:**

1. An EWMS is a planning and communication tool to help site crews manage their environmental impact during construction. Site crews should be trained in, and sign-on to, the EWMS (see section 3) before commencing the associated construction activity. Language used in the EWMS should be suitable for the audience that are expected to implement it.
2. This EWMS template should be completed to describe the methods and sequence of a construction activity (e.g.- clearing, earthworks, drainage works), the environmental hazards or risks associated with each step of the activity, and the corresponding site specific environmental controls that need to be implemented to manage the associated risks.
3. The template provides the minimum information that should be included in the EWMS - the level of detail included should be appropriate for the scale and risk of the activity.
4. A map that summarises key aspects of the activity, including identification of known environmentally sensitive areas, must be included in the appendix and cross-referenced throughout the document. The level of detail in the map should be appropriate for the scale and risk of the activity.
5. Other visual aids such as diagrams and photos should also be included in the document and/or attached in the appendices to illustrate how this EWMS will be implemented – the text content may be minimised by cross-referencing the visual aids
6. Additional sections can be added as necessary, and relevant information can be attached in Section 4.
7. The EWMS is a live document, and **must be updated** (see section 1.12) to address changed circumstances and ensure adequate mitigation of environmental impacts. The Revision History should be used to reflect updates.
8. While this is the current TfNSW template for EWMS, when developing your own EWMS, TfNSW requires that the Construction Contractor consider how the document will succinctly and effectively communicate the key risks and management measures to engage staff on site. In relation to this requirement, the Construction Contractor is to collaborate with TfNSW and the ER on the proposed approach.

# Environmental Work Method Statement

<insert activity>

Approval				
Approved by (name)	Position	Company	Signature	Date
<insert environment rep>				
<insert construction rep>				

Revision History		
Version	Release date	Description



<Insert contractor / project name>	<b>ENVIRONMENTAL WORK METHOD STATEMENT</b>		EWMS	#
	<b>&lt;INSERT ACTIVITY&gt;</b>		REV.	
			DATE	

## 1. ACTIVITY DETAILS

### 1.1 Description of the activity

<insert a summary of the activity, including the scope and how it fits into the broader construction program>

### 1.2 EWMS objectives

The objectives for this specific EWMS are <insert objectives>.

### 1.3 Key environmental elements

The key environmental elements that could be affected by construction impacts and need to be protected are:

- <insert key environmental element>
- <insert key environmental element>
- <insert key environmental element>
- <insert key environmental element>

Known environmentally sensitive areas are detailed in the map at Attachment A.

### 1.4 Construction method

<clearly describe the construction method that will be used. Cross-reference the attached map where relevant>

### 1.5 Location of the activity

<insert activity> will occur at <insert appropriate location detail corresponding to the scale of the activity, and consider using chainages, street intersections or appropriate landmarks>.

A map showing the key features of the activity, and the environmentally sensitive areas, is included at <insert Attachment name>.

### 1.6 Timing of works and expected duration

<insert activity> will commence on <insert date> and is expected to be completed by <insert date>.

Hours of operation for the activity are:

Day/s	Hours of operation
Monday to Friday	
Saturday	
Sunday	
Public holidays	

Other timing restrictions include <include other timing restrictions, such as noise respite periods>.

### 1.7 Approvals / permits / licences required

The key environmental approvals / licences / permits required to undertake <insert activity> are:

- <insert environmental approval>
- <insert environmental approval>
- <insert environmental approval>
- <insert environmental approval>

### 1.8 Consultation / communication required

The stakeholder consultation that will be undertaken before, during or after this activity is as follows:

<b>Consultation / communication activity</b>	<b>Stakeholder</b>	<b>Timing</b>	<b>Responsibility</b>
<i>Eg- Notification of start of works</i>	<i>Local residents and businesses</i>	<i>&gt;5 days prior to commencing works</i>	<i>Communications manager</i>

### 1.9 Incident response

Environmental incidents will be managed in accordance with the incident procedure detailed in the <insert document name (eg- CEMP)> and the <insert relevant TfNSW incident procedure name>.

The key step on-site is immediate notification of environmental incidents to:

- <insert name>, <insert title>, <insert phone number>

### 1.10 Relevant documents

The key documents that relate to this activity are:

<insert project name> CEMP	<insert document name>
<insert document name>	<insert document name>
<insert document name>	<insert document name>
<insert document name>	<insert document name>

### 1.11 Training

All personnel undertaking <insert activity> will be trained in this EWMS. Training will be delivered by <insert name/title of trainer> via <insert detail of how training will be delivered (eg- toolbox talk)>.

EWMS training will cover all aspects of this EWMS.

The EWMS sign-on sheet (see <insert section number>) will be completed by all personnel who have undertaken training and will be filed for record-keeping on <insert record keeping method>.

Relevant staff will also have the following training in order to effectively implement this EWMS:

<b>Training</b>	<b>Relevant Personnel</b>
<i>Eg- Erosion and Sediment Control</i>	<i>Leading hands, foreman</i>

### 1.12 Updates to this EWMS

The implementation of this EWMS and the effectiveness of environmental controls will be reviewed <insert review frequency> by <insert process that will be used to review EWMS>.

The EWMS will also be reviewed if the scope of works, construction methods, site conditions and/or required environmental controls change.

EWMS reviews, and any required updates, will be undertaken by <insert person>.

EWMS updates will be approved by <insert person>.

The updated EWMS will be provided to the Principal and re-communicated to all personnel involved in the activity, in accordance with section 1.11.



## 2. RISK ASSESSMENT AND ENVIRONMENTAL CONTROLS

**# Delete this text box prior to submission #**

### **Instructions for completing 'Table 2.3: Risk Assessment and Environmental Controls'**

1. Identify the sequential tasks for the activity, and the plant / equipment required to complete the tasks. Photos / maps / plans / diagrams can be included and cross-referenced to help illustrate the tasks (and also the environmental controls in Step 4) and reduce the amount of text required.
2. Identify the corresponding hazards for each task
3. Determine the initial environmental risk for each activity, in the absence of any environmental controls. To determine the risk you may use the risk matrix included in this template (Table 2.1). You may also delete this table and include an equivalent risk matrix.
4. Clearly describe the site-specific environmental controls that will be implemented to manage each hazard. These controls should be consistent with the safeguards / mitigation measures included in the project's environmental assessment (eg- REF). Controls should be practical to implement. The hierarchy of controls, from highest level of environmental protection to lowest, is as follows:  
Eliminate→Substitute→Engineering controls→Administrative controls
5. Determine the residual risk level that will remain after implementation of the environmental controls.
6. Table 2.2 describes the risk tolerance that can be accepted. Use Table 2.2, or an equivalent table, to determine the residual risks in the Risk Assessment that are acceptable. If the residual risk is deemed to be too high, review and adjust controls or adopt an alternative methodology with an acceptable risk level.

**Note:** In some cases a formal risk assessment may not be required – consult your EWMS approver (eg- the Principal) to discuss. Where it is agreed that a risk assessment is not required, remove Tables 2.1 and 2.2 and simply populate Table 2.3 without including the initial risk and residual risk.



<Insert contractor / project name>	<b>ENVIRONMENTAL WORK METHOD STATEMENT</b>		EWMS	#
	<b>&lt;INSERT ACTIVITY&gt;</b>		REV.	
			DATE	

Table 2.1: Risk Matrix								
		Consequence →	Insignificant	Minor	Moderate	Major	Severe	Catastrophic
			C6	C5	C4	C3	C2	C1
Likelihood ↓			No appreciable changes to environment.	Change from existing conditions that can be rectified immediately (< 1 day) with available resources.	Short-term (< 1 year) and/or well-contained environmental impact. Minor remedial actions probably required.	Short to medium term (between 1 and <5 years) environmental impact. Considerable remedial actions probably required.	Medium-term (>5 years) environmental impact. Extensive remedial actions probably required.	Long-term (>10 years) large-scale environmental impact. Extensive and ongoing remedial actions probably required.
Almost Certain	L1	Expected to occur frequently during time of activity or project. There is a very strong chance of this risk occurring. History shows that it is something that occurs frequently.	Low	Medium	High	Very High	Very High	Very High
Very Likely	L2	Expected to occur occasionally during time of activity or project. There is a good chance of this risk occurring. History shows that the risk occurs unacceptably too often.	Low	Medium	High	High	Very High	Very High
Likely	L3	More likely to occur than not occur during time of activity or project. There is a chance of this risk occurring in the current period. History shows that the risk has occurred on a number of occasions.	Low	Medium	Medium	High	High	Very High
Unlikely	L4	More likely not to occur than occur during time of activity or project. There is a chance of this risk occurring but not very often. History shows that this risk does happen but not very frequently.	Low	Low	Medium	Medium	High	High
Very Unlikely	L5	Not expected to occur during the time of activity or project. There is only an unusual chance of this risk occurring. History shows that this risk rarely happens, usually under unusual circumstances.	Low	Low	Low	Medium	Medium	High
Almost Unprecedented	L6	Not expected to ever occur during time of activity or project. There is very little or no real chance of this risk occurring. History shows that this risk hardly ever happens, if at all.	Low	Low	Low	Low	Medium	Medium

<Insert contractor / project name>	<b>ENVIRONMENTAL WORK METHOD STATEMENT</b>		EWMS	#
	<b>&lt;INSERT ACTIVITY&gt;</b>		REV.	
			DATE	

Table 2.2: Risk Tolerance and Response	
Risk rating	Tolerance and Response
<b>Very High</b>	<b>Very High</b> risks are generally intolerable and should be avoided except in extraordinary circumstances. An alternative solution must be found and all necessary steps must be taken to reduce the risk below this level.
<b>High</b>	<b>High</b> risks are undesirable. They can only be tolerated if it is not reasonably practicable to reduce the risk further. High risks are considered to be on the verge of being unacceptable and must be given immediate priority.
<b>Medium</b>	<b>Medium</b> risks are typically tolerable if it is not reasonably practicable to reduce the risk further. Additional controls should be sought if significant benefit can be demonstrated and/or there is an additional treatment measure which is recognised as good practice in other like environments.
<b>Low</b>	<b>Low</b> risks are considered to be broadly acceptable. If options for further risk reduction exist and costs are proportionate to the benefit, then implementation of such measure should be considered.

<Insert contractor / project name>	<b>ENVIRONMENTAL WORK METHOD STATEMENT</b>		EWMS	#
	<INSERT ACTIVITY>		REV.	
			DATE	

Table 2.3: Risk Assessment and Environmental Controls							
Sequence of tasks		Plant / equipment	Hazard	Initial risk	Site-specific Environmental Controls	Residual risk	Responsibility for managing environmental risks
1	Eg- Install orange flagging (bunting) with star pickets to delineate construction boundary	Hand tools only	Flagging installed in wrong area, resulting in clearing outside construction boundary	VH	Survey used to confirm construction boundary	L	Environment Mgr, Survey
2							
3							
4							
5							
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16							
17							
18							
19							
20							

### 3. SIGN-ON

Training in this EWMS delivered by:				
Name	Position	Company	Signature	Date

[illegible]



## **4. ATTACHMENTS**

Attachments to this EWMS are:

- A. Map of activity, including known environmentally sensitive areas
- B. Diagram of environmental controls
- C. <insert attachment (eg- photos of sensitive area/s)>
- D. <insert attachment (eg- toolbox package)>
- E. <insert attachment>

# Appendix A9

## M12 Central Pollution Incident Response Management Plan





M12 Motorway – Central

January 2025

## Document control

<b>File Name</b>	M12 Central CEMP
<b>Title</b>	M12 Central CEMP: Appendix A9 M12 Central Pollution Incident Response Management Plan
<b>Document Number (Teambinder)</b>	M12CCO-SYW-ALL-EN-PLN-000003

## Approval and authorisation

Plan prepared by:	Plan reviewed by:
	
Seymour Whyte Environmental Site Representative	Seymour Whyte Project Manager
14/01/2025	14/01/2025
	

## Revision history

Revision	Date	Description
A	12/07/2022	First draft for TfNSW review
B	08/01/2024	Updated contacts
C	14/01/2025	Updated to address TfNSW comments

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## Definitions

All terminology in this Procedure is taken to mean the generally accepted or dictionary definition with the exception of the following terms which have a specifically defined meaning. Acronyms are as per the OCEMP.

Term	Definition
ARSR	Amendment Report Submissions Report
CAQMP	Construction Air Quality Management Sub-plan
CCHMP	Construction Cultural Heritage Management Sub-plan
CCLMP	Construction Contaminated Land Management Sub-plan
CEMP	Construction Environmental Management Plan
CFFMP	Construction Flora and Fauna Management Sub-plan
CFMP	Construction Flood Management Sub-plan
CLM Act	Contaminated Land Management Act 1997
CMS	Complaints Management System
CNVMP	Construction Noise and Vibration Management Sub-plan
Commonwealth CoA	Federal Conditions of Approval under the EPBC Act
Construction	Includes all activities required to construct the CSSI as described in the documents listed in Condition A1, including commissioning trials of equipment and temporary use of any part of the CSSI, but excluding Low Impact Work which is carried out to complete prior to the approval of the CEMP, works approved under a Site Establishment Management Plan, demolition of acquired residential houses, structures and sheds, and works specified in Appendix B of the Infrastructure Approval and approved under an environmental management plan(s) in accordance with Condition A24.
Compliance audit	Verification of how implementation is proceeding with respect to a CEMP (which incorporates the relevant approval conditions)
CSSI	Critical State Significant Infrastructure
CSWMP	Construction Soil and Water Management Sub-plan
CTTMP	Construction Transport and Traffic Management Sub-plan
CWRMP	Construction Waste and Resource Management Sub-plan
DAWE	Commonwealth Department of Agriculture, Water and the Environment
EIS	Environmental Impact Statement

Term	Definition
EES	Environmental, Energy and Science (a part of NSW DPE)
EMS	Environmental Management System
Environmental aspect	Defined by AS/NZS ISO 14001:2015 as an element of an organisation's activities, products or services that can interact with the environment.
Environmental Assessment Documentation	Collective reference to the M12 EIS (Oct 2019), Submissions Report (Oct 2020), Amendment Report (Oct 2020), Amendment Report Submissions Report (Dec 2020) and supplementary reports as detailed in NSW CoA A1.
Environmental impact	Defined by AS/NZS ISO 14001:2015 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
Environmental incident	An unexpected event that has, or has the potential to, cause harm to the environment and requires some action to minimise the impact or restore the environment.
Environmental objective	Defined by AS/NZS ISO 14001:2015 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.
Environmental policy	Statement by an organisation of its intention and principles for environmental performance.
Environmental target	Defined by AS/NZS ISO 14001:2015 as a detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of construction. A key point of contact for the Planning Secretary in relation to environmental performance of the CSSI.
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
EPA	NSW Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPL	Environment Protection Licence
ERG	Environmental Review Group – generally comprising representatives of TfNSW, ER, Project delivery team, regulatory authorities (EPA, EES) and councils (Penrith City Council, Liverpool City Council and Fairfield City Council). The ERG will be maintained for the duration of the Project and will meet regularly and undertake environmental inspections. The role the ERG is to work collaboratively with the project team to provide proactive advice on environmental management issues on the Project.
ESM	TfNSW Environment and Sustainability Manager
ESR	Environment Site Representative (Seymour Whyte)

Term	Definition
EWMS	Environmental Work Method Statement
EWMS	Environmental Work Method Statement
Hold point	Is a verification point that prevents work from commencing prior to approval from TfNSW Services
Infrastructure Approval	Approval (SSI 9364) for carrying out of the M12 Project under Section 5.19 of the <i>Environmental Planning and Assessment Act 1979</i> subject to specific CoA as detailed in Schedule 2 of the approval.
km	kilometres
LGA	Local Government Area
Material Harm	<p>Harm to the environment is material if:</p> <ul style="list-style-type: none"> <li>it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</li> <li>it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and</li> </ul> <p>Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment. For the purposes of this definition, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.</p>
Minister, the	Minister of the NSW Department of Planning and Environment (or delegate)
MNES	Matters of Environmental Significance
NCR	Non-conformance report
Non-compliance	Failure to comply with the requirements of the Project approval or any applicable licence, permit or legal requirements.
Non-conformance	Failure to conform to the requirements of Project system documentation including this CEMP or supporting documentation.
Notifiable event	Any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify a regulatory authority.
NRAR	Natural Resources Access Regulator
NSW CoA	NSW Conditions of Approval
OCAQMP	Overarching Construction Air Quality Management Sub-plan
OCCHMP	Overarching Construction Cultural Heritage Management Sub-plan
OCCLMP	Overarching Construction Contaminated Land Management Sub-plan
OCEMP	Overarching Construction Environmental Management Plan
OCFFMP	Overarching Construction Flora and Fauna Management Sub-plan



Term	Definition
OCFMP	Overarching Construction Flood Management Sub-plan
OCS	Overarching Communication Strategy
CNVMP	Overarching Construction Noise and Vibration Management Sub-plan
OOHW	Out-of-hours work
CSWMP	Overarching Construction Soil and Water Management Sub-plan
CTTMP	Overarching Construction Transport and Traffic Management Sub-plan
CWRMP	Overarching Construction Waste and Resource Management Sub-plan
PIRMP	Pollution Incident Response Management Plan
Planning Secretary	Secretary of the NSW Department of Infrastructure, Planning and Environment, or delegate
Pollution incident	An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise
Primary CoA/REMM	CoA that are specific to the development of this Plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i> (NSW)
Pollution	Pollution (including air pollution, water pollution, noise pollution and land pollution) as defined in the dictionary to the POEO Act
Pollution incident	Has the same meaning as defined in the dictionary to the POEO Act.
Project, the	M12 Motorway Project
QA	Quality Assurance
Regulatory action	Any formal regulatory response from an environmental regulator including but not limited to penalty notices, clean-up notices, prevention notices, official cautions, show cause notices and formal warnings.
REMM	Revised Environmental Management Measures
Report-only event	An environmental incident or unexpected find resulting from circumstances outside the scope of controls and of an activity.
ROL	Road Occupancy Licence
SAP	Sensitive Area Plan
SEAR's	Secretary's Environmental Assessment Requirements

Term	Definition
Secondary CoA/ REMM	CoA that are related to, but not specific to, the development of this Plan
Significant incident	An environmental incident that is likely to receive a classification of C3, C2 or C1, OR the history of the project, past performance and/or previous regulatory interest, indicate the project is likely to receive a penalty notice or be subject to prosecution, and therefore requires escalation to the Secretary and other TfNSW senior management.
TfNSW	Transport for New South Wales (formerly Roads and Maritime Services)
Unexpected find	An unexpected discovery such as a heritage item, threatened species, contamination, asbestos or hazardous substance.
Work	Any physical work to build or facilitate the building of the CSSI, including low impact work, environmental management measures and utility works. However, it does not include activities that inform or enable detailed design of the CSSI and generate noise that is no more than 5 dB(A) above the rating background level at any sensitive receiver.
WSIA	Western Sydney International Airport
WSIP	Western Sydney Infrastructure Plan

# 1 Introduction

This Pollution Incident Response Management Plan (PIRMP or Plan) forms part of the Construction Environmental Management Plan (CEMP) for the M12 Motorway – Central Package (M12 Central Package)

This PIRMP is required to support the CEMP and has been prepared to address the requirements of Specification G36 Environmental Management and Section 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act).

## 1.1 Background

Transport for New South Wales (TfNSW) is planning to construct and operate the M12 Motorway (the Project) to provide direct access between the Western Sydney International Airport (WSIA) at Badgerys Creek and Sydney's motorway network. The M12 Motorway will run between the M7 Motorway at Cecil Hills and The Northern Road at Luddenham for about 16 kilometres (km) and is expected to be opened to traffic prior to opening of the WSIA.

Key features of the Project include:

- An east-west 16 km motorway between the M7 Motorway, Cecil Hills and The Northern Road, Luddenham
- A motorway built for four lanes (with provision for up to six lanes) with a median to separate opposing traffic flows
- A direct connection to Western Sydney International Airport
- A new connection to The Northern Road with traffic lights
- A motorway-to-motorway interchange at the M7 Motorway
- Provision for a future interchange connecting Mamre Road and Devonshire Road at the M12 Motorway.

EPL 21596 for the project is held by Seymour Whyte Constructions Pty Ltd. Seymour Whyte Constructions Pty Ltd control the premise and are responsible for the preparation and implementation of the CEMP and associated subplans. This CEMP establishes the system for a structured approach to environmental management, and provides the overall framework to ensure that environmental impacts are minimised, and legislative requirements are fulfilled

## 1.2 M12 Central

Seymour Whyte has been engaged to deliver the M12 Central package. Construction of the M12 Central package involves building 7.5 km of motorway from west of Badgerys Creek to the Water Tower Access Road within Western Sydney Parklands.

The M12 Central package will provide a dual carriageway with a wide median to allow for future widening to six lanes. Safety barriers will be provided along the length of the package. Emergency stopping bays and emergency crossovers will also be provided at regular intervals. A shared user path with lighting will provide an active transport link along the motorway and eastward to the M7.

The M12 Central package includes the following bridges:

- Twin bridges over South Creek
- A bridge for Clifton Avenue over the M12 Motorway
- Twin bridges over Kemps Creek
- Twin bridges over Elizabeth Drive near Mamre Road
- Twin Bridges over Range Road
- A bridge for the Water Tower Access Road over the M12 Motorway
- A private property access bridge in University of Sydney land.

Retaining walls will be provided around Range Road to help limit Project impacts on Range Road. Adjustments will be made to local roads including Clifton Avenue and Salisbury Road.

The M12 Central package also requires relocation of utility services including electricity, water and telecommunications. Urban design features of this package include Aboriginal artwork on bridges, rest areas on shared user paths, interpretive signage and landscape planting.

### **1.3 Environmental management systems overview**

This PIRMP has been prepared to identify and manage the risk of pollution incidents and facilitate a coordinated management response to pollution incidents during the M12 Motorway – Central Package.

A PIRMP is required for all projects that hold an Environment Protection Licence (EPL). The requirements were introduced through amendments to the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO Regulation).

Seymour Whyte hold Environmental Protection Licence 21596, which was transferred from TfNSW on 17-Jun-2022.

### **1.4 Purpose and objectives**

The primary purpose of the plan is to identify and manage the risk of pollution incidents, plan the project response to pollution incidents and to facilitate coordination with the relevant response agencies.

The objective of the plan is to:

- Minimise and control the risk of a pollution incident at the premises of the project through the early identification of risks and the development of planned actions to minimise and manage those risks.
- Ensure timely communication about pollution incidents to construction personnel, the Environment Protection Authority (EPA), relevant response agencies/authorities and the community who may be affected by the impacts of a pollution incident.
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.



## 1.5 Scope

This PIRMP for the M12 Motorway Central Package covers pollution incidents that cause actual or potential material harm to the environment and/or human health. This PIRMP applies to the scheduled activity to which the Environment Protection Licence (EPL) relates.

The location of the project to which this plan applies is provided in Appendix 1. Also outlined in the location drawing is the position of:

- the site office which will act as the Incident Control Centre; and
- the location of potential pollutant storage, which are nominated to be within the project ancillary facility sites to be used by Seymour Whyte. The ancillary facility sites are listed in Table 1-1.

Table 1-1 Ancillary facility site locations

AF	Location	Approximate size (ha)	Purpose
AF4	West of Clifton Avenue, north of proposed main line	3.0	Concrete/asphalt batching plant Plant servicing workshop Stockpile and laydown area Main offices Amenities Vehicular access Car park
AF5	West of Mamre Road North of Elizabeth Drive	4.1	Plant servicing workshop Stockpile and laydown area Secondary offices Amenities Vehicular access Car park
AF6	South of Elizabeth Drive opposite Duff Road	1.9	Plant servicing workshop Stockpile and laydown area Crushing and screening activities Amenities Vehicular access Car park No site offices proposed for site establishment
AF12 a	West of Clifton Avenue	1.7	Stockpile and laydown area

AF	Location	Approximate size (ha)	Purpose
AF12 b	West of Clifton Avenue	2.6	Crushing and screening activities Amenities Vehicular access Car park
AF13	East of Salisbury Avenue	4.1	Stockpile and laydown area, Amenities Vehicular access Car park
AF15	South of the intersection of Elizabeth Drive and Mamre Road	2.08	Stockpile and laydown area, Secondary offices, Amenities Vehicular access, Car park
AF16	Within the carpark of the existing Wylde Mountain Bike Trail	1.0	Stockpile and laydown area amenities vehicular access car park crushing

## 2 Legislative and regulatory requirements

### 2.1 Legislation

Legislation relevant to the pollution incident response management plan includes:

- *Protection of the Environment Operations Act 1997*
- Protection of the Environment Operations (General) Regulation 2009
- Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012.

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in Appendix A1 of the CEMP.

### 2.2 Guidelines and Standards

The main guidelines, specifications and policy documents relevant to this Plan include:

- Environmental guidelines: Preparation of pollution incident response management plans, 2012.
- TfNSW QA Specification G36 – Environmental Protection - M12 Motorway (Central), Construction between Badgerys Creek and the Water Tower Access Road, Cecil Hills, April 2022.

### 2.3 Legislative Requirements

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the POEO Regulation. A summary of the key requirements is:

- Holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act).
- Licensees must test the plan annually in accordance with the POEO Regulation (clause 98E).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

### 3 Pollution Incidents

Pollution is known to exist in many forms and broadly relates to water, land, air and noise. This plan applies only to those pollution incidents as defined in the Environmental guidelines: Preparation of pollution incident response management plans. The guidelines provide the following definition of a pollution incident to be:

*“pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”*

#### 3.1 Pollution incidents that are to be notified

The Environmental Site Representative (ESR) (or delegate) will immediately notify the relevant Regulatory Authority, TfNSW Environment and Sustainability Manager (ESM) and other Authorities in the event of Material Harm (refer to Table 3-1).

Subject to POEO Act s.147, harm to the environment is material if:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations).

Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment. For the purposes of this definition, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Table 3-1 Contact details of Agencies

Relevant Authority	Name / Location / purpose	Contact Number
Emergency Services	Ambulance Service / Rescue  Police Service  Fire and Rescue NSW	000*
<b>*Only ring 000 if the incident presents an immediate threat to human health or property and response by an emergency services agency is warranted. If the incident does not require an initial combat agency, notify as listed below.</b>		
EPA	Pollution Line	131 555
Department of Planning Housing, Industry and Environment	Thomas Minchin	0436 682 790
Ministry of Health	Public Health Unit – Northern Sydney Area	02 9477 9400
SafeWork NSW	Information Line	131 050
Fairfield City Council	Customer Contact Centre	(02) 9725 0222



Liverpool City Council	Customer Contact Centre	1300 36 2170
Penrith City Council	Operational Communications	(02) 4732 7777
NSW Police	Green Valley Police Station	(02) 9607 1799
NSW Fire and Rescue	Orchard Hills Station	(02) 9318 4399
Traffic Management Centre	Headquarters	(02) 8396 1400
NSW State Emergency Service	Headquarters	132 500

When notifying authorities in accordance with Section 147 that a pollution incident has occurred, the following information must be provided in accordance with Section 150 of the POEO Act 1997:

- the time, date, nature, duration and location of the incident;
- the location of the place where pollution is occurring or is likely to occur;
- the nature, the estimated quantity or volume and the concentration of any pollutants involved;
- the circumstances in which the incident occurred (including the cause of the incident (if known));
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution; and
- other information prescribed by the regulations.

The information required is the information known to the person notifying the incident when the notification is required to be given.

If the information required to be included in a notice of a pollution incident under items c, d and e is not known when the initial notification is made but becomes known afterwards, that information must be notified immediately after it becomes known

### 3.2 Types of pollution incidents

Pollution incidents that could potentially occur at a construction site, and that are covered by this plan include:

- Material, such as waste materials, fuel etc., that travel beyond the site boundary causing or potentially causing adverse impact to the environment or community.
- Discharge of waters from site not in accordance with the project Environment Protection Licence condition.

Small spills that do not leave the site boundary and are cleaned up without material environmental harm or residual environmental impact are most likely not required to be notified to the EPA or other authorities, however all such incidents are to be recorded and reported in accordance with client and/or organisational requirements.

An environmental incident may include a major spillage or leak, failure of a pollution control device such as a bund or basin, major settlement, collapse of a bank or embankment, or catastrophic events.

The Environmental Site Representative and the Project Director in consultation with the Seymour Whyte National Environmental Manager are responsible for classifying the level of incident. The classification of the incident will occur in two ways:

- The incident will be classified and reported to TfNSW in accordance with the M12 Environmental Incident Classification and Reporting Procedure.
- For internal reporting purposes and in accordance with the Environmental Management System, the SWC Incident Management and Reporting Procedure (SWC-SOP-008) will apply.

### 3.3 M12 Environmental Incident Classification and Reporting Procedure

All spills must be reported in accordance with the incident notification and investigation procedure outlined M12 Environmental Incident Classification and Reporting Procedure the M12 Central package CEMP Appendix A7. A summary of the Environmental Incident Classifications can be found in Table 7-1.

In accordance with MCoA A44 and A45, the Planning Secretary must be notified via the Major Projects Website immediately after the Proponent becomes aware of an incident. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and nature of the incident. Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A of the Infrastructure Approval.

### 3.4 Prevention.

Seymour Whyte's approach is to carry out construction activities in a planned and controlled manner, taking into account potential environmental risks, to prevent pollution incidents from occurring on the project. Preventive measures include:

- Construction planning including environmental risk assessment.
- Implementation and maintenance of identified control measures.
- Compliance with legislative and regulatory requirements, including the project Environment Protection Licence.
- Implementation of, and compliance with, requirements of the Construction Environmental Management Plan and associated sub-plan.
- Implementation and compliance with the requirements of this plan.

### 3.5 Risk Assessment

The risk management style of assessment has been utilised to identify and assess environmental aspects associated with the activity relative to the EPL, and to implement appropriate mitigation strategies to minimise the likelihood of environmental risks or incidents associated with each aspect. This process involves:

- Identifying the risk/aspect.
- Analysing the risk/aspect (determining likelihood and consequence).
- Evaluating the risk/aspect.
- Treating the risk.

All identified aspects are assessed based on the risk assessment matrix displayed Table 3-2. Risk assessment is based on (1) the likelihood of an impact occurring as a result of the aspect; and (2) the consequences of the impact if the event occurred. Table 3-3 and Table 3-4 provide the Seymour Whyte definitions of likelihood and risk.

Following this assessment, each impact is assigned a risk category which range from "Low" (low likelihood and consequence) to "extreme" (high likelihood and consequence).

More detailed risk assessments are within the relevant sub-plans of the CEMP and include specific control measures that must be implemented.

Table 3-2 Risk Matrix

		CONSEQUENCES					
			C1	C2	C3	C4	C5
			Catastrophic	Major	Moderate	Minor	Insignificant
LIKELIHOOD	L1	Almost Certain	Extreme	Extreme	High	High	Medium
	L2	Likely	Extreme	High	High	Medium	Medium
	L3	Possible	High	High	Medium	Medium	Low
	L4	Unlikely	High	Medium	Medium	Low	Low
	L5	Rare	Medium	Medium	Low	Low	Low

Table 3-3 Environmental Risk Likelihood Guide

Description	Definition of Event	How Often It Occurs
Almost Certain	Continuously Experienced	Daily - 1/ Week
Likely	Likely to Occur Frequently	Weekly - 1/ Month
Possible	Likely to Occur Infrequently	Monthly - 1/ Year
Unlikely	Occurrence not Expected, but Possible	Annually - 1/ Decade
Rare	Exceptional Cases	Decade - 1/ Century

Table 3-4 Environmental Risk Consequence Guide

Description	Environmental Impact Indicator
Catastrophic	Major Environmental Damage, Uncontrolled/ Off-Site Release, Unknown Substance, Detrimental Effects
Major	Significant Environmental Damage, Uncontrolled/ Off-Site Release Unknown Substance, No Detrimental Effect
Moderate	Serious Environmental Damage, Onsite Release, Known Substance Contained with External Assistance
Minor	Minor Environmental Damage, Onsite Release/ Immediately Controlled, Known Substance Contained with No External Assistance
Insignificant	Negligible Environmental Damage, Small Onsite Loss/ Easily Contained, Known Substance Contained with No External Assistance

Table 3-5 Risk Assessment

Aspect	Potential Impact	Low	Medium	High	Extreme
Vegetation clearing	Surface water pollution			X	
Topsoil stripping	Surface water pollution			X	
Bulk earthworks	Surface water pollution			X	
	Dust emissions causing a notifiable incident			X	
Drainage works	Surface water pollution			X	
Bridge construction	Surface water pollution			X	
	Groundwater pollution			X	
Ground disturbance of unexpected contamination	Exposure to construction workers			X	
	Surface water pollution			X	
	Exposure to community			X	
	Groundwater pollution			X	
Construction of drains and re-alignment of creek beds	Surface water pollution			X	
Paving	Surface water pollution		X		
	Groundwater pollution		X		
	Soil / land pollution		X		
Fuel and chemical storage areas	Surface water pollution			X	
	Groundwater pollution		X		
	Explosion / fires			X	
	Soil / land pollution			X	
Sewerage treatment/storage facilities	Surface water pollution			X	
	Soil / land contamination			X	
	Groundwater contamination			X	
Crushing/Grinding	Oil / fuel spills causing water pollution			X	
	Oil / fuel spills causing soil/land contamination			X	



Aspect	Potential Impact	Low	Medium	High	Extreme
	Dust emissions impacting community		X		
Fuel Deliveries	Fuel spills causing water pollution			X	
	Fuel spills causing soil/land contamination			X	

### 3.6 Control Measures

Pre-emptive control measures rest with thorough planning of construction activities and the involvement of key personnel in that planning process. The project CEMP requires that Environmental Work Method Statements (EWMS) are prepared for all activities that carry an inherent level of environmental risk or community interest.

All EWMS will be prepared to identify risks, ensure sound environmental practices are implemented, and to minimise the risk of environmental incidents or system failures. They will specify actions to be undertaken to ensure compliance with the CEMP and will draw on the mitigation measures detailed in the specific sub plans detailed in Annexures of the CEMP.

### 3.7 Preparedness

Seymour Whyte acknowledges that the key to effective incident prevention on site is via ongoing monitoring, surveillance and training. During the course of construction, the following preventative strategies will be implemented onsite:

- Daily inspections of active work sites
- Completion of Environmental Inspection Checklist
- Issue and quick close-out of non-compliance notices (as required)
- Prompt maintenance and repairs
- Ongoing environmental training
- Environmental audits of worksites, sub-contractors and general compliance
- Environmental and safety information on hazardous substances (e.g. MSDS) will be available at the main site office and where such substances are to be stored.

Testing of environmental response procedures will be conducted annually in accordance with the POEO Act. Additional testing will be carried out in areas where a pollution risk is present, such as in workshops and work areas in close proximity to water courses. Personnel involved in emergency response activities will be provided with specific training.

An up-to-date list of emergency response personnel and relevant organisations (emergency services, EPA, etc.) will be maintained at the main office and site compounds. A copy of this emergency contact list is provided in Table 1-13.

### 3.8 Responsibilities

The details of how this sub plan will be implemented and the responsibilities for implementing each mitigation measure are detailed below. These responsibilities will be issued to all relevant personnel on appointment to the Project and/or as part of their site induction programme.

The personnel detailed in Table 3-6 would be responsible for activating the plans and managing the response on a 24-hour basis. The actions of the ESR, Superintendent/ Supervisor Responsibilities and the Community Relations Coordinator are outlined in Table 3-7, Table 3-8 and Table 3-9

Table 3-6 24-hour Contact Details

Name	Position title	24 hour contact details
Frank Callanan	Superintendent and Emergency Controller	0448 968 722
Scott Calleja	Project Manager	0404 058 351
Tom Bath	Environment Site Representative	0447 491 159

Table 3-7 Environmental Site Representative responsibilities

Action	Timing
In the event of an environmental incident, such as a spill, investigations of the mitigation measures and determine the potential for improved mitigation measures	As required
Reporting of environmental incidents to the relevant authorities	As required
Ensure the plan is tested every 12 months.	Every 12 months
Provide training to project personnel about this plan and responsibilities	As required
Amend this plan as necessary	As required

Table 3-8 Superintendent/ Supervisor Responsibilities

Action	Timing
Contact emergency services, such as NSW Fire & Rescue, HAZMAT and/or Police	As required
Maintain communications with emergency services	At all times
Coordinate the response to the incident, including working to ensure the safety of others in the first instance	At all times

Table 3-9 Community Relations Coordinator Responsibilities

Action	Timing
Coordinating the notification of the effected community in response to an incident.	As required
Assist the Environmental Site Representative in the testing of the plan.	Every 12 months
Review and revise the Community Liaison Plan	Where required or every 12 months.
Maintain contact lists for community notifications	As required

All site personnel, staff and sub-contractors have a role and responsibility in minimising the risk of a spill and controlling the impact if one occurs. This will be reinforced through the project induction and on-site training. Further details are provided in the CEMP.

### 3.9 Training

All site personnel involved in construction of the M12 Central package will be trained and inducted in this Procedure.

Additional training will be provided personnel involved in storage or handling will be provided with additional training. Training will include inductions, toolbox talks, pre-starts and targeted training as required.

## 4 Notifiable Incidents

A notifiable event is any environmental incident, report-only event or non-compliance that triggers a specific statutory requirement to notify an authority.

The key notification requirements are described in Section 6. Note each statutory requirement to notify may specify a particular person who is responsible to make the notification as well as the timing of when this must occur.

### 4.1 Material Harm Pollution Incidents

Under Part 5.7 of the POEO Act, there is a duty to immediately notify (i.e. promptly and without delay) each relevant authority of a pollution incident where material harm to the environment is caused or threatened.

The POEO Act states that a pollution incident should be considered Material Harm if:

- “(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- “(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000”*

Material Harm only relates to pollution incidents. Other environmental incidents, such as conservation, heritage and planning breaches, are not included in the definition of a pollution incident.

Material Harm pollution incidents require notification to the NSW Planning Secretary as required by NSW CoA A44 and A45.

#### 4.1.1 Determination of Material Harm

The determination on whether a pollution incident should be considered Material Harm should be made in accordance with Table 4-1.

Table 4-1 Determination of Material Harm Pollution Incidents

Project delivery	Material Harm determination
Activities undertaken by contractors	<p>The M12 project team will make the determination (and any associated notifications) on whether a pollution incident should be considered Material Harm.</p> <p>The relevant TfNSW Environment Manager or Environment Branch Director may contact the DES to assist in making an assessment of the incident, to aid the contractor in determining if the pollution incident should be considered Material Harm.</p> <p>Where TfNSW believes a pollution incident should be considered Material Harm but the contractor disagrees, TfNSW is required by law to notify EPA, NSW DPE and other relevant authorities. In this instance the DES or DE would make a determination on whether the incident should be notified by Transport for NSW as Material Harm. Transport for NSW would provide details of any notifications made to the contractor.</p>

Even if only limited information is available for a pollution incident being considered Material Harm, each relevant authority must be immediately notified with the information available and updates provided as soon as further relevant information becomes available.



In circumstances where there is doubt about the need to notify a pollution incident as Material Harm, Transport for NSW and its contractors should always err on the side of notification.

#### 4.1.2 Notification of Material Harm Pollution Incidents

The relevant authorities that must be notified for a Material Harm pollution incident are listed in Section 4.7 and Table 1-11. It is important to note the order of notification and phone numbers to use can vary depending on the nature of the pollution incident, as detailed in Table 4-2 and Table 4-3.

All of the authorities listed (whether considered relevant or not) must be contacted for each Material Harm pollution incident to satisfy POEO Act requirements. Serious penalties apply to both individuals and corporations for failing to notify Material Harm pollution incidents:

- Maximum penalty for individuals - \$500,000
- Maximum penalty for corporations - \$2,000,000.

Table 4-2 Authorities to notify for Material Harm Pollution Incidents that present an immediate threat to human health or property

Order	Authority	Contact Number
1	Fire and Rescue NSW	000
2	NSW EPA environment line	131 555
3	Ministry of Health (via the local Public Health Unit)	Contact 1300 066 055 to be directed to the local Public Health Unit, or visit the <a href="#">NSW Health Website</a>
4	SafeWork NSW	131 050
5	The Appropriate Regulatory Authority, being either: <ul style="list-style-type: none"> <li>• Local council</li> <li>• DPE</li> </ul>	Local council - contact Office of Local Government on 4428 4100, or visit the <a href="#">Office of Local Government website</a> Via the Major Projects Portal

Table 4-3 Authorities to notify for Material Harm Pollution Incidents that do NOT present an immediate threat to human health or property

Order	Authority	Contact Number
1	NSW EPA environment line	131 555
2	Fairfield City Council	02 9725 0222
3	Liverpool City Council	1300 362 170
4	Penrith City Council	02 4732 7777
5	Ministry of Health (via the local Public Health Unit)*	Contact 1300 066 055 to be directed to the local Public Health Unit, or visit the NSW Health Website
6	SafeWork NSW	131 050
7	Fire and Rescue NSW	1300 729 579
8	DPHIE Thomas Minchin	Via the Major Projects Portal or 046 682 790

#### 4.1.3 Relevant information to provide

Section 150 of the POEO Act provides the information that needs to be notified, being:

- The time, date, nature, duration and location of the incident
- The location of the place where pollution is occurring or is likely to occur, the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- The circumstances in which the incident occurred (including the cause of the incident, if known)
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known
- Other information prescribed by the regulations.

Only known information should be provided when notifying of a Material Harm pollution incident. If further information becomes known after the initial notification, that information must immediately be notified to all authorities in accordance with Section 150. The immediate verbal notification is to be followed by written notification to each relevant authority within seven days of the date on which the incident occurred.

Complying with these notification requirements does not remove the need to comply with any other legislative requirements for incident notification (e.g. requirements under the conditions of an EPL or the Work Health and Safety Act 2011).

Relevant information required for notification to DPE in accordance with NSW CoA A44 and NSW CoA A45 is outlined in Section 6.5.

## 5 Incident Response

The following framework support is provided for to support incident response.

### 5.1 Define the problem

Establish the details of the immediate problem to facilitate the identification of short term response options.

### 5.2 Manage the situation

Determine and implement management options to bring the problem under control including:

- The safety of any person, including neighbours, worker and others potentially impacted, e.g. downstream water users, is the priority.
- Minimise environmental damage as quickly as possible. In a spill situation, use sandbags, absorbent material, soil, an excavation or barrier to prevent the pollutant from reaching a watercourse.
- Advise the Project Director and Environmental Site Representative of the incident/emergency.
- Project Director and/or Environmental Site Representative will report the incident to the respective and Seymour Whyte National Environmental Managers (as required).
- Immediately advise the client verbally and in writing within 48 hours.
- The Environmental Site Representative, Project Director and/or the National Environmental Managers will advise the organisations listed in Table 1-11 if the incident 'causes or threatens to cause material harm to the environment\*' immediately in accordance with the POEO Act requirements.
- Clean up the problem.

### 5.3 Spill Response

The following are general procedures for managing a chemical spill:

- Report the spill incident immediately to site supervisor, Occupational Health and Safety Manager and Environment Manager
- Contact the NSW Fire and Rescue immediately on 000 if the spill presents a significant risk of harm to people or the environment
- Stop the spill at source as first priority provided it is safe to do so
- If the spill is not contained, apply spill response materials to contain and absorb the spill and to direct away from waters, drainage lines or sensitive environments. Flow paths should be blocked and the spill contained within the site boundaries
- Chemical spills should never be hosed by water, any water that comes into contact with the spill should be treated as contaminated wastewater
- Where possible, areas contaminated by spills should be covered during rainfall to the extent that it does not compromise clean-up activities
- Ensure that any used spill response materials (contaminated waste) are disposed appropriately

- Investigate the cause of each spill to determine and implement preventative actions to reduce the risk of a similar incident occurring.

## 5.4 Procedures for dealing with fire/spills/containment

In the event of a fire, the following procedure should be followed:

- Evacuate the worksite and move to a well-ventilated area
- Notify Person in Charge (PIC)
- Contact 000 to mobilise the NSW Fire Brigade or HAZMAT where the incident cannot be controlled with onsite resources
- Do not touch or operate electrical equipment.

In the event of a spill, the following procedure should be followed:

- Notify Person in Charge (PIC)
- Contact 000 to mobilise the NSW Fire Brigade or HAZMAT where the incident cannot be controlled with onsite resources
- Establish and/or strengthen controls around stormwater drains including drain wardens and sandbags around the drain perimeter
- Mobilise a vacuum truck to remove excess water/liquid from the site and dispose to an appropriately licensed facility
- Deploy spill kit materials to contain and absorb the spill
- Remove used spill kit materials from the site and dispose to an appropriately licensed facility.

## 5.5 Notifications

The Environmental Site Representative, Project Director or the National Environmental Managers will advise the following organisations if the incident 'causes or threatens to cause material harm to the environment\*' immediately in accordance with the POEO Act requirements:

- EPA.
- Ministry of Health (via the Public Health Unit).
- Work Cover Authority.
- Local Authority (i.e. council) if the EPA is not the appropriate authority.
- Fire and Rescue NSW.

The ESR will notify the Project Director of all environmental incidents and Seymour Whyte's respective National Environmental Managers will be notified of any incidents which may require agency / regulator notification.

Notification will be made to the Client in accordance with contract requirements. The information that needs to be reported is:

- Time, date, location and likely duration of incident.
- Location of place where pollution is occurring or likely to occur.
- Type of incident (e.g. chemical spill, water pollution etc.).
- Extent of incident (e.g. magnitude of spill, area covered etc.).



- Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution.
- Notifications to authorities must be verbal communication (i.e. – via telephone call).

A record of information provided during notification of pollution incidents in accordance with this plan shall be recorded on an external communication summary worksheet.

## 5.6 Community notifications

Early warnings for affected or potentially affected community members for any pollution incident will be communicated to those members via a door knock process.

For air pollution incidents that may affect community members, those community members may be asked to either close their doors and windows and stay indoors until further notice or the vacate the premises. For water pollution incidents that may affect community members, those community members may be asked to avoid use of the water until further notice.

Seymour Whyte will provide regular updates of any pollution incidents either via letterbox drop, notices in local papers and/or via door knocks as required.

## 5.7 After the event

After the event it is necessary to evaluate the problem and implement corrective measures;

- Develop an action plan to prevent a similar incident occurring again.
- Prepare a report on the incident.

## 5.8 Investigations

A root cause analysis investigation must be completed by the ESR for all environmental incidents with a classification of C1, C2 or C3, or any other environmental incidents or non-compliances as determined by TfNSW.

The scope of the investigation will be determined by the TfNSW Environment Officer or Environment Manager. The ESR must provide TfNSW with a final investigation report within three weeks of the environmental incident or non-compliance being identified. The report must include the minimum information described in Table 5-1.

Table 5-1: Investigation report

Element	Description
Sequence of events	The sequence of events that led to the incident or non-compliance
Findings	Given the sequence of events, what are the key findings of the investigation (i.e. what are the main causes of the incident or non-compliance).
Management methods	A record of the management methods to be changed and/or implemented to avoid the incident or non-compliance reoccurring.
Key learnings	Describe the key learnings from the investigation into the incident or non-compliance. Detail which learnings may be relevant to other transport projects.

## 5.9 Corrective actions

There are a variety of scenarios in which an environmental event may occur. It is important that corrective actions are:

- Specific to the incident that has occurred
- Meaningfully address the root cause(s) of the incident
- Designed to prevent incident reoccurrence.

Corrective actions could include (but are not limited to) the following:

- Physical works to install, augment or rectify controls or a site issue
- Testing and/or monitoring
- Review and improvement of construction methods or work practices
- Review and update of management plans, procedures or other tools
- Communication, training and awareness initiatives for workers.

In most cases it will not be sufficient to simply notify workers of correct systems / procedures (e.g. via toolbox talk). A review should be undertaken by the ESR following an incident or non-compliance to determine why the systems / procedures failed (or alternatively a formal investigation), and necessary changes made to ensure they do not fail in future. Site personnel should then be made aware of the changes and trained as necessary.

Immediate/short-term corrective actions including timeframes for completion must be clearly described in incident/non-compliance reporting. Updates about longer-term corrective actions including timeframes for completion can be provided to the TfNSW Environment Officer and TfNSW Project Management Team post submission of the incident/non-compliance report.

## 5.10 Non-compliances

A non-compliance is a failure to comply with any condition of approval, environmental assessment safeguard / mitigation measure, licence condition, permit or any other statutory approval relevant to the activity and/or area where the activity occurs.

A non-compliance could also be an environmental incident.

## 5.11 Regulatory action

Regulatory action includes, but is not limited to:

- Prosecutions
- Penalty notices
- Clean up notices
- Prevention notices
- Official cautions
- Formal warnings
- EPA show cause notifications.

Copies of any regulatory action issued by an environmental regulator must be provided as part of the reporting that is undertaken in accordance with this Procedure.



## 6 Significant incident escalation process

Where a TfNSW Environment Manager believes that a Significant Incident has occurred, they must immediately phone the relevant TfNSW Environment Director. The TfNSW Environment Director will consult with the TfNSW Executive Director Environment and Sustainability, who will determine whether the incident will be considered a Significant Incident. Once a Significant Incident has been determined, the escalation process will commence as outlined below.

### 6.1 Significant incident information management

Following determination of a Significant Incident, it is essential that there is fast, consistent and accurate reporting of information to the TfNSW senior management. As such, clear roles and responsibilities must be established in two key areas, as described in Table 6-1.

Table 6-1: Roles and responsibilities during a significant incident

Role	Who	Responsibilities
Information Controller	TfNSW Environment Manager (or relevant TfNSW Environment Officer in their absence)	<ul style="list-style-type: none"> <li>Liaise between the on-site TfNSW project management team and the Information Distributor (below)</li> <li>Be the single point of contact to provide information and updates about the status of the Significant Incident to the Information Distributor</li> </ul>
Information Distributor	TfNSW Executive Director Environment and Sustainability (or relevant TfNSW Environment Director in their absence)	<ul style="list-style-type: none"> <li>Identify the relevant members of the TfNSW Executive and other TfNSW senior management that will form the distribution group to be informed about the Significant Incident</li> <li>Consolidate information from the Information Controller, and distribute it to the distribution group</li> <li>Provide key ongoing updates to the distribution group as it becomes available</li> <li>Respond to enquiries from the distribution group, ensuring all members of the distribution group are copied into every response</li> </ul>

### 6.2 Parties to be notified

The Information Distributor must identify relevant TfNSW senior management from delivery and client divisions that will form the distribution group to be informed about the Significant Incident, including ongoing updates. Table 6-2 provides the key positions that must be included (at a minimum), depending on who is undertaking the activity. Depending on the type and location of the activity, there may be other areas of TfNSW that should be included in the distribution group.

The distribution group should all be notified concurrently in a single email that a Significant Incident has occurred. The email should be sent by the Information Distributor within five minutes of making the determination of the Significant Incident.

Table 6-2: TfNSW Distribution group to be notified of a Significant Incident

Position	Greater Sydney
Transport exec notification	Secretary
SER executive notification	Deputy Secretary, Safety Environment and Regulation

Client executive notification	Deputy Secretary, Greater Sydney Executive Director, Community and Place Director Western Parkland City
Delivery executive notification	Deputy Secretary, Infrastructure and Place Head of Sydney Project Delivery Executive Director Western Sydney Project Office
Project Team notification	M12 Project Director M12 Deputy Project Director M12 Project Manager M12 Environment Manager

### 6.3 Emergency and key contacts

The TfNSW Environment and Sustainability Manager is the first point of contact for enquiries relating to environmental incidents. The list of key contacts will be maintained and displayed. Current contacts for relevant M12 personnel are provided in Table 6-3

Table 6-3 Emergency and key contacts

Position / Organisation	Name	Phone
EPA pollution hotline	n/a	131 555
Fire and Rescue NSW	n/a	000 (for pollution incidents that present an immediate threat to human health or property)  1300 729 579 (for pollution incidents that do not present an immediate threat to human health or property)
NSW Health – South Western Sydney Local Health District	n/a	(02) 8738 5755
SafeWork NSW	n/a	131 050
Penrith City Council	██████████	██████████
Liverpool City Council	██████████	██████████
24 hour community information line	n/a	1800 517 155
Project Manager – East	██████████	██████████
Project Manager – Central	██████████ ██████████	██████████
Project Manager – West	██████████	██████████
TfNSW Project Director	██████████	██████████



Position / Organisation	Name	Phone
TfNSW Environment and Sustainability Manager	[REDACTED]	[REDACTED]
TfNSW M12 Community and Stakeholder Engagement Representative	[REDACTED]	[REDACTED]
TfNSW M12 WHS Partner	[REDACTED]	[REDACTED]
TfNSW Environment Officer	[REDACTED]	[REDACTED]
Department of Planning and Environment	[REDACTED]	[REDACTED]
Sydney Metro – Western Sydney Airport	[REDACTED]	[REDACTED]
University of Sydney	[REDACTED]	[REDACTED]
Western Sydney International Airport	[REDACTED]	[REDACTED]

## 7 Review and improvement of the PIRMP

### 7.1 Continual Improvement

Continual improvement of this plan will be achieved by the annual evaluation of the implementation of the PIRMP, evaluation of environmental incidents and the testing of this plan.

The continual improvement process will be designed to:

- Identify areas of opportunity for improvement of pollution incident which leads to improved environmental performance.
- Determine the root cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address non-conformances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets.

Testing of this plan is required to be undertaken, as a minimum, once every 12 months. Testing is to be carried out in such a manner as to ensure that the information in this plan is relevant, up to date, and that the plan is capable of being implemented in a workable and effective manner.

The plan will be similarly reviewed within one calendar month of having been implemented.

Personnel involved in emergency response activities will be provided with specific training.

An up-to-date list of emergency response personnel and organisations will be maintained at the main office and compounds.

### 7.2 Plan Update

As described in the CEMP, between the scheduled audits and reviews, a register of issues will be maintained to ensure that any issues are recorded for future action.

Changes to this plan will be approved by the Environmental Site Representative and the Project Director and documented in the document control section for each revision. A copy of the updated plan and changes will be distributed to all relevant stakeholders.

Table 7-1: Environmental incident classification

Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
Environment	<ul style="list-style-type: none"> <li>No appreciable changes to environment.</li> </ul>	<ul style="list-style-type: none"> <li>Change from existing conditions that can be rectified immediately (&lt; 1 day) with available resources.</li> </ul>	<ul style="list-style-type: none"> <li>Short-term (&lt; 1 year) and/or well-contained environmental impact.</li> <li>Minor remedial actions probably required.</li> </ul>	<ul style="list-style-type: none"> <li>Short to medium term (between 1 and &lt;5 years) environmental impact.</li> <li>Considerable remedial actions probably required.</li> </ul>	<ul style="list-style-type: none"> <li>Medium-term (&gt;5 years) environmental impact.</li> <li>Extensive remedial actions probably required.</li> </ul>	<ul style="list-style-type: none"> <li>Long-term (&gt;10 years) large-scale environmental impact.</li> <li>Extensive and ongoing remedial actions probably required.</li> </ul>
Reputation and integrity	<ul style="list-style-type: none"> <li>Single negative article in local media.</li> <li>Limited social media commentary.</li> <li>Goodwill, confidence and trust retained.</li> <li>Confined to the Branch.</li> <li>Local council may want to discuss.</li> </ul>	<ul style="list-style-type: none"> <li>Series of negative articles in local media (District / electorate based adverse media).</li> <li>Some social media commentary.</li> <li>Confidence remains - minor loss of goodwill.</li> <li>Confined to Branch but requiring notification to Division. Council requires written explanation.</li> <li>Recoverable with little effort or cost.</li> <li>Some continuing scrutiny/attention.</li> </ul>	<ul style="list-style-type: none"> <li>Extended local media coverage with some broader Regional media coverage.</li> <li>Extended negative social media coverage.</li> <li>Confidence and trust of stakeholders dented (recoverable at modest cost within existing budget and resources).</li> <li>Division formal response needed to State Government/Regulator.</li> </ul>	<ul style="list-style-type: none"> <li>State media coverage, short term negative national media coverage.</li> <li>Widespread social media coverage</li> <li>Confidence/trust impaired.</li> <li>Project/activity credibility under question.</li> <li>TfNSW and/or Ministers Department requires update.</li> </ul>	<ul style="list-style-type: none"> <li>Sustained negative State media coverage.</li> <li>Regular 'talk-back' programs questioning credibility and capability.</li> <li>Confidence and trust are severely damaged.</li> <li>Widespread negative social media coverage.</li> <li>Regular updates demanded by Minister.</li> <li>Stakeholders withdraw their support recoverable at considerable cost,</li> </ul>	<ul style="list-style-type: none"> <li>Sustained, high profile media attention at National level.</li> <li>Material change in the public perception of the Agency.</li> <li>Extensive negative social media coverage</li> <li>Confidence and trust non-existing.</li> <li>Government forced to reverse decision.</li> <li>Stakeholders are actively campaigning against the organisation.</li> </ul>

Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
					time and staff effort.	
Regulations and compliance	<ul style="list-style-type: none"> <li>Low-level/Technical non-compliance with legal and/or regulatory requirement or duty by individuals or TfNSW- not reportable.</li> <li>Minor non-compliance to a low impact contract clause – little or no interest by either party to pursue or rectify.</li> </ul>	<ul style="list-style-type: none"> <li>Non-compliance with whole or significant aspects of Government policy not reportable but requiring internal activity to put in place.</li> <li>Formal investigation and/or formal notification to regulator.</li> <li>Minor breach of contract by either party rectified through local management discussion.</li> </ul>	<ul style="list-style-type: none"> <li>Non-compliance with key Government policy - reportable and/or explanation required – need to put in place as soon as possible.</li> <li>Non-compliance – key obligation.</li> <li>Formal notification to regulator.</li> <li>Agency on notice.</li> <li>Breach of contract by either party rectified at Branch level management discussion.</li> <li>Small fine and no disruption to services.</li> </ul>	<ul style="list-style-type: none"> <li>Technical non-compliance with a minor Government Policy - not reportable.</li> <li>Low level non-compliance.</li> <li>Technical non-conformance.</li> <li>Minor non-compliance to a low impact contract clause – little or no interest by either party to pursue or rectify.</li> <li>Substantial fine and no disruption to services.</li> </ul>	<ul style="list-style-type: none"> <li>Non-compliance with high profile, outward facing Government policy or Ministerial decree - immediately reportable to Government body (e.g. Treasury) and action to put in place required immediately (high priority).</li> <li>Continuous breach resulting in prohibition notices.</li> <li>Breach of significant, key aspects of contract by either party leading to lodgement (threat) to sue and recompense at severe financial levels</li> <li>Cessation of contract may occur.</li> <li>Large fines as a result of non-compliance.</li> </ul>	<ul style="list-style-type: none"> <li>Non-compliance with high profile Government policy or Ministerial decree - immediately reportable to Ministerial level requiring actions to put in place immediately (high priority) and progress to be reported to the Minister on an agreed and appropriate schedule.</li> <li>Litigation and potentially imprisonment.</li> <li>Loss of Operating licenses.</li> <li>Continued breach cannot be tolerated.</li> <li>Major contract breach by either party leading to significant litigation and financial costs</li> </ul>



Key risk area	Incident Category					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
					<ul style="list-style-type: none"><li>• Licence or accreditation restricted or conditional affecting ability to operate.</li></ul>	<ul style="list-style-type: none"><li>• Total breakdown and cessation of contract.</li><li>• Criminal prosecution as a result of non-compliance.</li></ul>



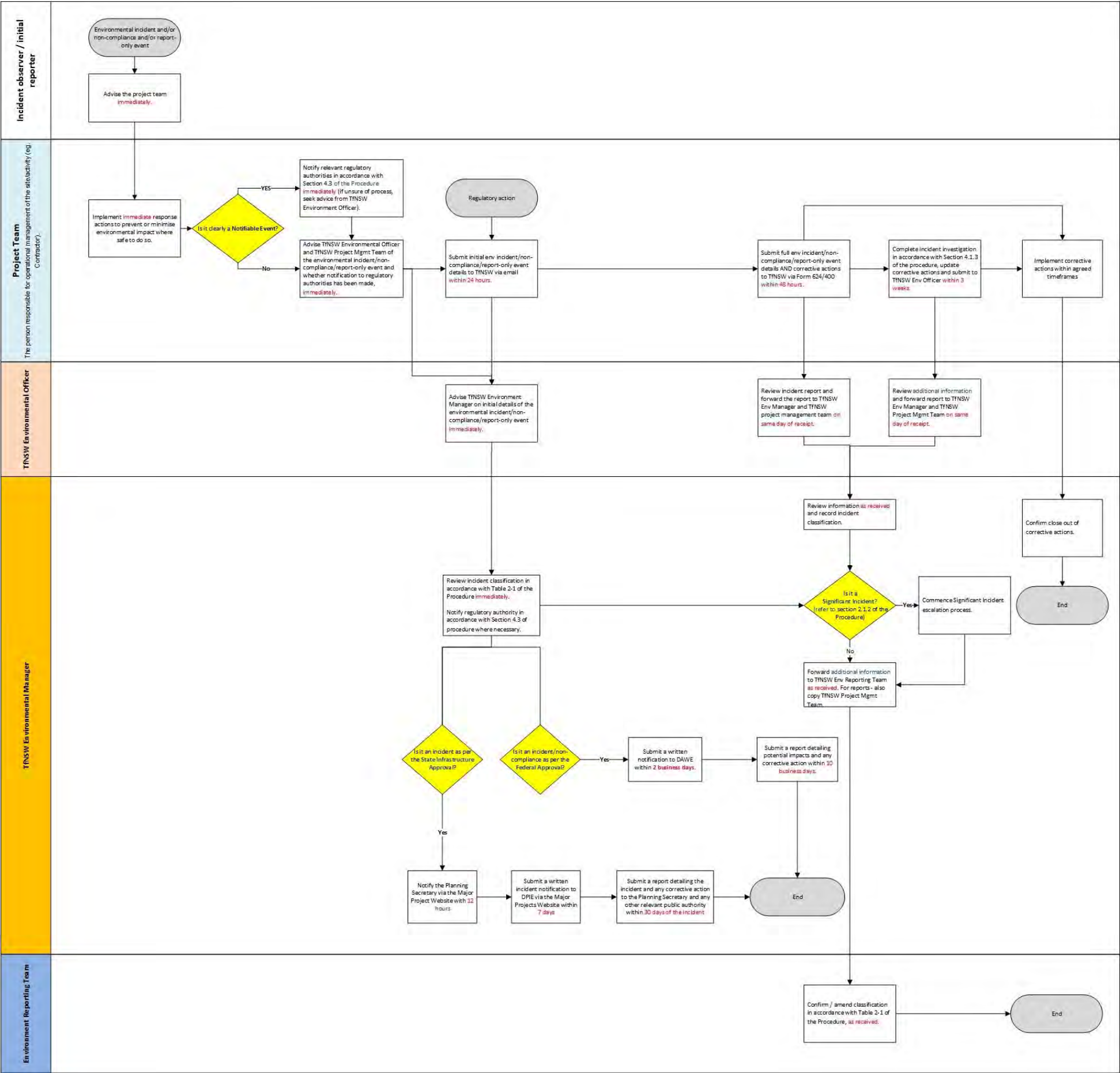


Figure 7-1: Reporting Process



# Appendix 1 – Premise Map and Ancillary Facilities





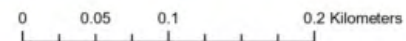
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Consent of the Quality Record is confirmed that the design and drawing have been verified as conforming with the requirements of the Quality Plan. Where the Quality Record is incomplete, all information on this sheet shall be included in the next revision of the Quality Plan.															





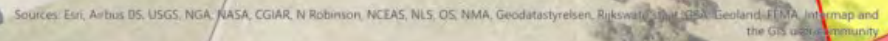
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- M12 Central
- Watercourse
- Cadastral Lot and DP



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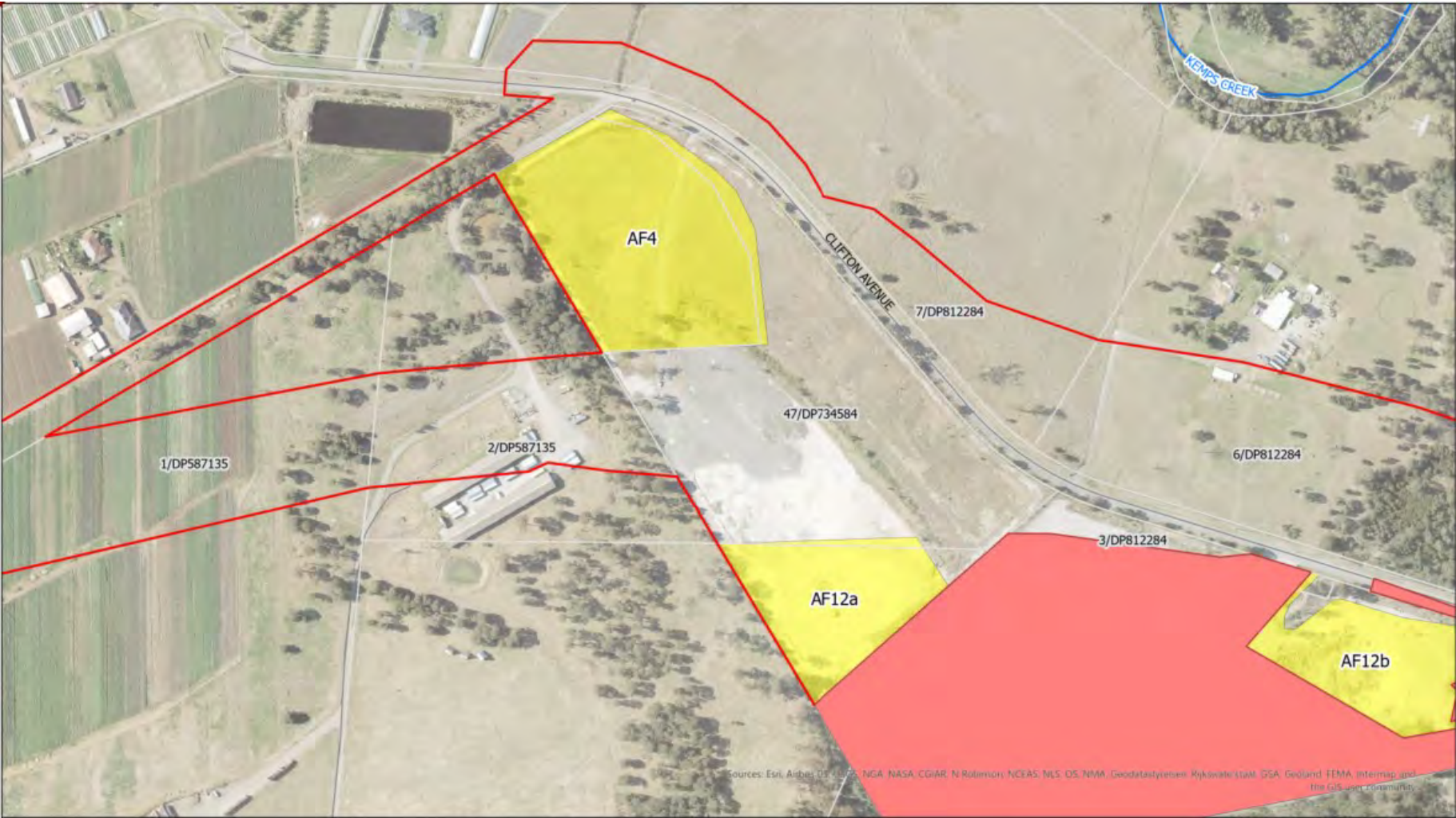


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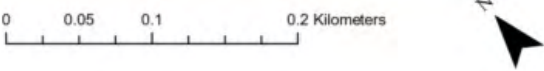


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- Exclusion Zones
- M12 Central Ancillary Facilities
- Watercourse
- Cadastral Lot and DP

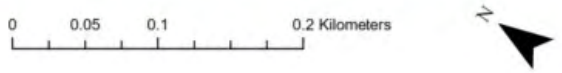


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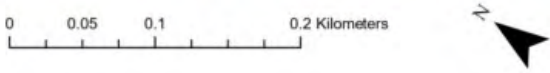


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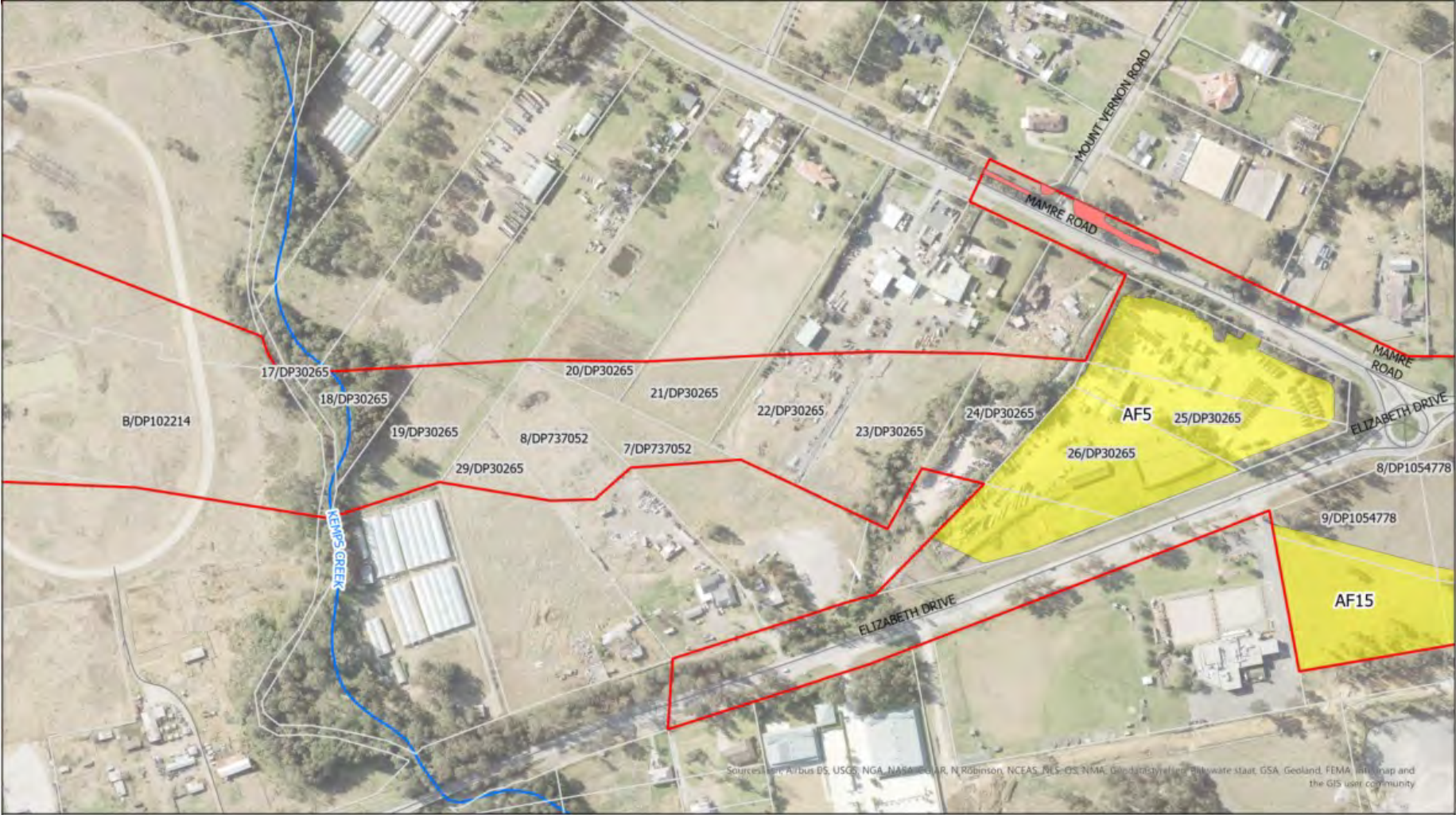
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Blue line: Watercourse  
White outline: Cadastral Lot and DP

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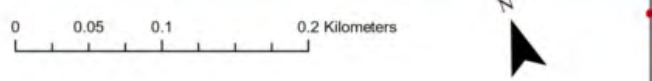


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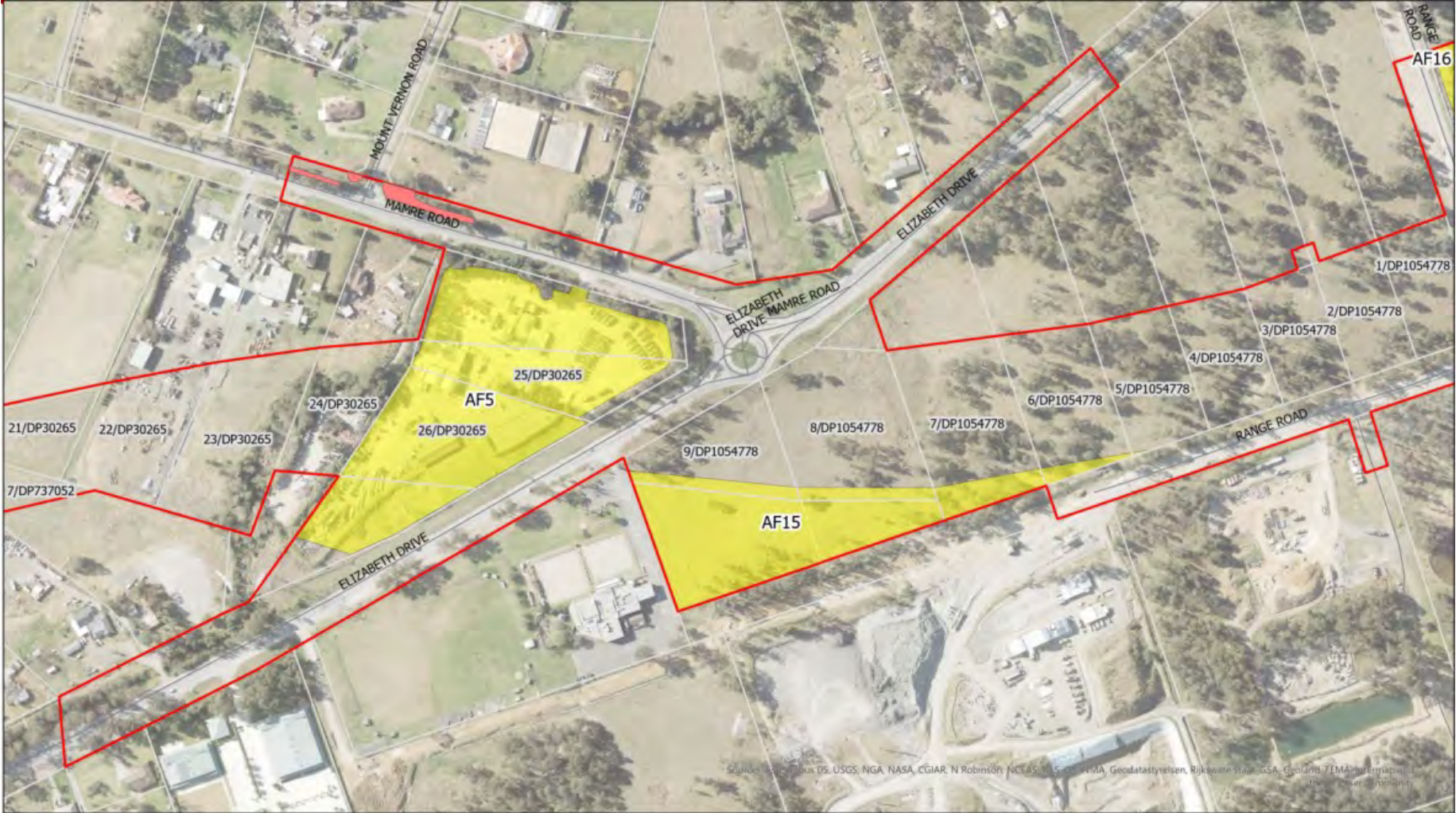


- M12 Central
- Exclusion Zones
- M12 Central Ancillary Facilities
- Watercourse
- Cadastral Lot and DP



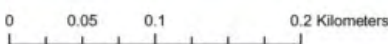
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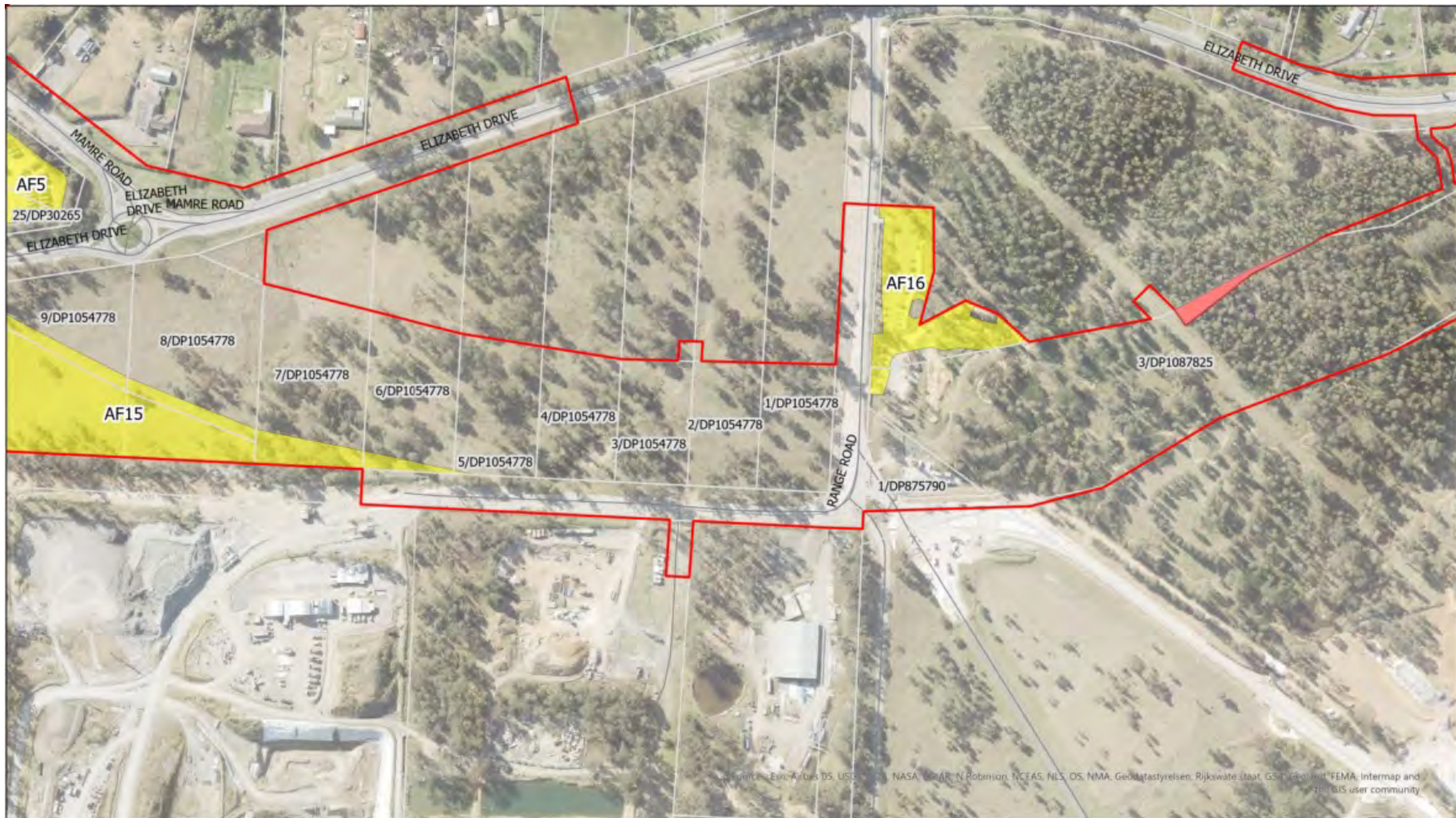
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 Cadastral Lot and DP



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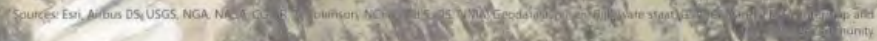
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- M12 Central
- M12 East
- Exclusion Zones

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▬ Cadastral Lot and DP

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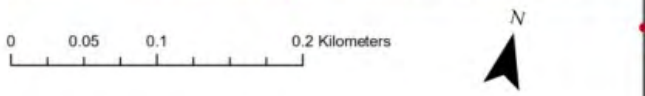


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