Appendix 11 To HSE Plan

Environmental Management Plan

Revision 6
January 2025

Project Number: 210002

Site Address: 8-10 Lee street, Haymarket NSW 2000

Date of Issue. 13/01/2025

THE NEW WAY FORWARD

Table of Contents

Version Number	Amendment Date	Amendment Description*	PM's initials (acceptance of changes)
1	15/06/2022	Formation of Appendix 11	WF
2	27/02/2023	Periodic review of Appendix 11	WF
3	07/12/2023	Periodic review following inspection from Environmental Manager, policy updates.	GH
4	26/03/2024	Periodic review following Internal HSE Audit. Updates made to reflect project specific works, including tunnelling.	TP
5	10/01/2025	Periodic review of Appendix 11 and alignment with tower structure phase of project	TP

1. Environmental Management Policy

Built

Environmental Management Policy

Our Aim

Built is committed to establishing and maintaining ours and our clients' work environments with priority given to minimising adverse environmental effects from our activities and fostering a culture of sustainable environmental management.

The Built environmental strategy is the ongoing development of a system based on IS014001, legislation and applying the principles of best practice environmental management to our activities.

Built is committed to objectives and individual programs by applying proactive approaches to environmental stewardship through:

- Identifying environmental activities, aspects and impacts and applying appropriate environmental actions.
- Minimising the effects of our activities on the environment.
- Preventing pollution.
- Complying with applicable environmental laws and regulations, Codes of Practice and Guidelines leading to the development of appropriate monitoring, measurement and review activities.
- Working cooperatively with our clients and responsible agencies in exercising environmental due diligence at all stages.
- Conducting relevant environmental education and training to improve awareness, knowledge and skills Developing and implementing plans and procedures for the effective operation and management of our processes.
- Meeting Performance Standards and Key Performance Indicators and taking action to improve performance through regular and formal reviews.
- Communicating with staff, clients and stakeholders on all areas on environmental performance.

Built is committed to continual improvement in environmental management. This includes regular monitoring, assessment and review or al aspects of the system by both internal and external audits.

David Paterson
CEO, Construction
November 2024

2. Environmental Sustainability Policy

Built

Environmental Sustainability Policy

Our Aim

Built is committed to environmentally sustainable work practices and aspires to be recognised as a leading environmentally responsible contractor across all business operations Australia-wide.

Consistent with our Environmental Management Policy, we will seek to continually improve on environmental outcomes within the Built environment through the adoption of best practice environmental sustainability principles, including:

- Eliminating, or where this is not possible, minimising waste from our activities and recovering resources for reuse or recycling
- Minimising our consumption and use of water and natural resources
- Reduce our carbon emissions to as low as is possible, through the efficient use of electricity and fossil fuels
- Protecting land quality and biodiversity from negative impacts associated with our operations
- Working cooperatively with our clients to achieve their objectives for environmental sustainability
- Raise the level of awareness of our staff, employees and contractors through the provision of training, instruction and information on the requirements for and importance of the sustainable use of natural resources and energy efficiency
- Work cooperatively in a consultative manner with our clients, responsible agencies and other stakeholders in exercising environmental due diligence across all areas of our business operations, including openly communicating, listening and responding to concerns of those potentially affected by our project operations
- Promoting the benefits of sustainable building design through the participation in and delivery of Green Star, NABERS rated projects and other world leading sustainability rating tools

David Paterson
CEO, Construction
November 2024

3. Development Consent – Conditions of Approval

The relevant requirements of SSD 10405 for this CEMP are listed in Table 1-1 and cross reference to where it is addressed under the Project documentation.

Table 1: Conditions relevant to the CEMP

Reference number	Requirements	Document Reference
C14	Management plans required under Conditions C15 to C21 of this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020) and a copy provided to the Planning Secretary and Council for information.	• Section 3 CoA
C15	Prior to the commencement of any demolition or dismantling, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier. The CEMP must include, but not be limited to, the following: (a) Details of:	• This Document
(a)(i)	hours of work;	• Section 2.4 of the Construction Management Plan • Section 4 of the Construction Noise, Vibration and Dust Management Plan
(a)(ii)	24-hour contact details of site manager;	• Section 2.1 of the HSE plan.
(a)(iii)	stormwater control and discharge;	• Lee Street Dewatering Plan
(a)(iv)	measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;	• Section 12.2 •
(a)(v)	external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	• Noted that Section 4.2.1 of the Construction Management Plan discusses Lee Street only.
(a)(vi)	community consultation and complaints handling;	• Section 16.2 and Section 17.4. • Section 5.3 of the Community Complaints Strategy • Section 2.8 of the Construction Management Plan • Urbis Engagement Atlassian Central Construction Communications Strategy

Reference number	Requirements	Document Reference
(a)(vii)	measures to ensure the Devonshire Street Pedestrian Tunnel remains open and operational throughout the construction phase of the development and the final measures must be developed in consultation with key stakeholders;	• Devonshire Street Demolition MP, •
(a)(viii)	air quality management including issues associated with odour, minimising dust on site and prevention of dust from leaving the site during construction works;	• Section 12.2 • Attachment 1 – Environmental Aspects & Impacts Register • Plan Annexure to be added.
(a)(ix)	incorporation of all acoustic management and treatments.	• Section 12.2 • Linkage to Noise, Vibration and Dust MP
(b)	Construction Traffic and Pedestrian Management Sub-Plan (see Condition E16);	• Not found in supplied documents. • Appears DST and RCD documents likely to contribute to requirement.
(c)	Construction Noise and Vibration Management Sub-Plan (see Condition E18);	• Section 12.2 • Plan Annexure to be added.
(d)	Construction Waste Management Sub-Plan (see Condition E19);	• Section 12.2 • Plan Annexure to be added.
(e)	Construction Soil and Water Management Sub-Plan (see Condition E20);	• Section 12.2 • Plan Annexure to be added. • ESCP by TTW.
(f)	Flood Emergency Response (see Condition E21);	• Section 12.2 • Plan Annexure to be added.
(g)	an unexpected finds protocol for contamination and associated communications procedure;	• Section 12 in HSE-P (note) • Attachment 2 of this Plan.
(h)	an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and	• Attachment 2 of this Plan • Urbis Heritage Management Plan
(i)	waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site.	• Section 14. (Updates to section needed) • Attachment 1.

4. Environmental Management Plan

The Environmental Management Plan is an attachment to the HSE Plan and describes the environmental strategy, methods, controls and other requirements to effectively manage environmental aspects of the project and should be read in conjunction with the Project HSE Plan.

The Environmental Management Plan shall be reviewed at Project Team Meetings and following any significant environmental incident or significant changes to the project scope or methodology at frequencies not exceeding 12 months.

5. Purpose of the Environmental Management Plan

Identify the environmental issues (aspects and impacts) relevant to the project;

- Establish the environmental and operational controls to reduce any adverse impacts on the environment from the company's activities, products and services.
- Describe the methods and processes by which the project will maintain compliance with all relevant environmental legislation, any applicable license, approval and permit, regulatory requirements
- Ensure the works are effectively managed so as to eliminate or reduce potential adverse impacts on the environment as a result of construction activities
- Action any outcomes from incidents or accidents, project audits or other identified non-conformances and to continually improve the Environmental Management System.

6. Environmental Objectives

Built's environmental objectives for the project are:

Table 2: Environmental Objectives

Aspect	Objective	Target
Corporate Objectives and Targets		
Waste	To minimise waste going to landfill	90% landfill diversion
Sediment & Erosion Control	To prevent sediment from entering waterways or stormwater	Zero incidents
Water quality	To prevent contamination of water ways	Zero incidents of water way pollution
Noise & vibration	To proactively address community complaints regarding noise or vibration	Respond to any community concerns within 48 hours
Dust	To proactively address community complaints regarding dust	Respond to any community concerns immediately
Project Objectives and Targets		
Carbon	To minimise embodied carbon emissions produced during construction	50% reduction of embodied carbon
Waste	To minimise waste going to landfill	90% landfill diversion
Existing Toxins	Manage existing toxins	Dispose of or treat CCA containing woods and lead hazards, asbestos and PCB's

Aspect	Objective	Target
Toxic Substances	Controlling the storage and use of toxic substances and chemicals on site	<10 encounters of non-compliant products on site.

7. Environmental Rating Tools

7.1. NABERS Energy

The NABERS Energy Rating scheme assists office building owners and tenants to reduce energy use, reduce energy costs and reduce greenhouse emissions.

There is a proposed NABERS Energy rating for this project. (The NABERS rating is: 5.5 Stars)

7.2. NABERS Water

The NABERS Water Rating scheme assists office building owners and tenants to reduce water use and water costs.

There is a proposed NABERS whole building rating for this project. (The rating is: 4 star)

7.3. Green Star

Green Star rating system is a comprehensive, national, voluntary environmental rating scheme that evaluates the environmental design and achievements of buildings

There is a proposed Green Star rating for this building. (The Green Star rating is: 6 star)

7.4. LEED

LEED (Leadership in Energy and Environmental Design) is the most widely used green building rating system in the world. LEED is for all building types and all building phases including new construction, interior fit outs, operations and maintenance and core and shell.

There is a proposed LEED v4.1 BD+C rating for this building. (The rating is: Platinum)

7.5. WELL

Delivered by the International WELL Building Institute (IWBI), the WELL Building Standard implements, validates and measures features that support and advance human health and wellness for buildings, interior spaces and communities.

There is a proposed WELL Core v2 rating for this project. (The rating is: Platinum)

8. Internal and External Communication

Monthly PCG (Project Control Group) – External

Environmental management issues and sustainability progress will be updated within the Monthly PCG report as necessary.

Monthly PMR (Project Management Report) - Internal

Environmental management issues and sustainability progress will be updated within the Monthly PMR as necessary.

Rapid Incident

All environmental incidents are to be reported through Rapid Incident Reporting. Significant incidents shall be investigated, and a report distributed to senior management and other parties, as required.

HSE-029 – Toolbox Meeting and Consultation Record

A prompt is provided within the Toolbox talk form to enable any environmental issues arising on site, or other information relevant to the workforce, to be discussed.

Subcontractor Meeting

A prompt is provided within the Subcontractor Meeting Agenda to enable any environmental issues arising on site, or other information relevant to the subcontractors, to be discussed.

9. Project Organisational Chart

Refer to clause 4.2 of the HSE Plan and Appendix 3 of the HSE Plan

10. Responsibilities & Duties

Table 3 contains a summary of key responsibilities for the project team related to this EMP.

Where a person is appointed to a position and is unable to meet their assigned responsibilities, they shall immediately notify the Project Manager or most senior person or their immediate Line Supervisor/Manager.

Table 3: Project EMP Roles and Responsibilities

Role	Responsibilities
Construction Manager	- Always show visible project leadership and lead by example to develop a culture of commitment to delivering the project within the bounds of this EMP and all associated Management Plans - Ensure a project specific EMP, including the associated Attachments are finalised and are implemented and maintained - Allow for sufficient time and resources to implement the Company and Project HSE management systems and the Projects HSE and Environmental Management Plan - Review, approve and monitor the Project HSE and Environmental Management Plan to ensure it remains up to date and in line with the project scope - Monitor project HSE and Environmental performance, including lag and lead indicators, the timely closure of corrective and preventive action in respect of incidents and the results of HSE audits - Ensure appropriate consultation arrangements are established with the workforce, and other stakeholders. - Ensure that Built site staff and site personnel are provided with appropriate training, information, instruction and supervision in relation to all aspects of the Project, including those necessary to comply with their assigned tasks and responsibilities as outlined in this EMP
Project Manager	- Oversee project compliance with relevant regulatory and other requirements - Manage the project's implementation of all requirements of this EMP, and promote environmental requirements so that they are not secondary to other construction requirements - Oversee program of project inductions - Investigate all complaints to achieve effective resolution - Stop work immediately if an unacceptable impact on the environment is likely to occur
Project Engineer	- Undertake detailed planning of execution methodologies for the works and site resource areas and review with the Project / Site Manager - Provide detailed planning of traffic management requirements: routes, plans, signage, etc - Obtain all required authorisations prior to commencing work in accordance with the EMP - Work collaboratively with subcontractors to maximise performance wherever possible - Undertake planning of site resource areas e.g., site establishment locations, laydown areas - Detailed execution of the EMP with respect to gaining relevant Approvals in ensuring work fronts can be opened - Ensure facility operations meet performance requirements - Liaison with the Site Supervisor to ensure site controls are installed as detailed within this EMP - Monitor compliance with EMP requirements by Built and subcontractor employees and take prompt corrective action when necessary - Assist in the preparation of HSE documentation such as standard operating procedures, risk assessments and SWMS for high-risk construction work

Role	Responsibilities
	- Assist supervisors in conducting and documenting weekly site safety inspections, toolbox talks and detailing responsibilities for completing corrective actions within specified timeframes
Site Manager	- Implementation of measures prescribed by the EMP assigned areas of responsibility. - Guiding the entire Built site team in practical construction matters - Management of subcontractor adherence to Built's EMP - Ensuring well-coordinated use of project resources - Allowing for sufficient time and resources to implement the Project EMP - Cleanliness of the site and review of all protection measures - Liaising with all other parties (i.e., subcontractors, employee representatives) to ensure that the site operates in a safe manner and in compliance with this EMP and all other associated Management Plans - Review, approve and monitor the EMP to ensure it remains up to date and in line with the project scope - Monitor project performance, including lag and lead indicators, the timely closure of corrective and preventive action in respect of incidents and the results of site audits - Adding value to the project delivery process wherever possible
Site Supervisor	- Communicate with all personnel and sub-contractors regarding compliance with the EMP and site-specific environmental issues - Provide an environmental induction to all site workers as part of the site induction prior to the commencement of works; - Undertake site inspections, carry out monitoring activities and complete site checklists - Co-ordinate the implementation and maintenance of erosion and sediment control measures - Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Project Manager - Manage all subcontractors and consultants with regards to environmental matter, including assessing the environmental capabilities - Co-ordinate actions in an emergency situation and allocate required resources - Stop activities where there is an action or immediate risk of harm to the environment and advise the Project Manager
HSE Advisor/Environmental Advisor	- Conduct regular site inspections of the works to confirm that the required environmental safeguards are being implemented - Identify where the implemented environmental measures are not meeting the targets set, and identify areas where improvement can be achieved - Authority to stop work on any activity where the Environmental Manager deems it necessary to prevent environmental non-conformities - Notify relevant parties of any environmental incidents
Project team members	- Comply with the relevant requirements of this EMP - Participate in the mandatory site inductions

Role	Responsibilities
	- Undertake site inspections, carry out monitoring activities and complete site checklists - Report any environmental incidents to your Supervisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident - Undertake remedial action as required to maintain environmental controls are maintained in good working order - Stop activities where there is potential or immediate risk of harm to the environmental and advise the Site Manager/Site Supervisor/Project Manager
Subcontractors	- Comply with the relevant requirements of this EMP - Participate in the mandatory site inductions - Report any environmental incidents to your Supervisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident - Undertake remedial action as required to maintain environmental controls are maintained in good working order - Stop activities where there is potential or immediate risk of harm to the environmental and advise the Site Manager/Site Supervisor/Project Manager

11. Environmental Risks/Environmental Aspects

Potential environmental obligations and risks associated with the project shall be identified prior to the start of the project by the Project Team in consultation with the Project Manager on the **'Project Environmental Aspects and Impacts Register' (Refer Attachment 1).**

A copy of the 'Environmental Aspects and Impacts Register' is to be provided to relevant subcontractors prior to their commencement on site and is to be taken into account in the execution of their work.

Risks levels (i.e., Consequence and Likelihood) in relation to environmental Aspects and Impacts rated as 'High' or 'Medium' are considered 'Significant' as they have the potential to adversely impact on the environment, result in additional costs to and potential fines to Built or damage the company's reputation. Where an environmental aspect results in a positive impact on the environment (e.g., waste elimination or waste re-use) these are considered too also be significant.

12. Environmental Impacts and Controls

12.1. Project Environmental Management Plans

The **'Project Environmental Aspects and Impacts Register'** describes operational controls used to manage environmental issues across the project.

The Foreman will ensure that environmental controls are inspected on a regular basis, as part of the site inspections described in the HSE Plan or as separate environmental inspections and are in accordance with the requirements outlined in the **'Project Environmental Aspects and Impacts Register.'**

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

12.2. Supplementary Environmental Plans

Supplementary Plans required by the contract or deemed necessary by the Project Manager will be attached to this plan.

Supplementary Plans required by the contract for the project are:

- Waste Management Plan
- Soil and Water Management Plan
- Noise & Vibration Management Plan
- Construction Flood Emergency Response Sub-Plan
- Community Liaison Management Plan
- Conservation Management Plan
- Traffic Management Plan
- Devonshire Street Tunnel (DST) Management Plan – Appendix to CMP.
- Railway Colonnade Drive (RCD) Management Plan – Appendix to CMP.

Supplementary environmental plans are provided for review in conjunction with this plan.

13. Subcontractors and Suppliers

Subcontractors and suppliers shall meet the environmental management requirements specified in the HSE Plan.

Subcontractors shall be made aware of their responsibilities under the terms of the applicable environmental legislation, by being provided a copy of this Environmental Management Plan and any relevant sub plan and by participating in site induction and subcontractor coordination meetings.

Subcontractors will be requested to submit appropriate environmental control procedures or other information such as ITP's providing details of how they intend to manage environmental aspects and potential impacts of their work.

Where subcontractors do not have such documentation, Built may assist in the development of any necessary documentation, including induction of the subcontractor and those carrying out the work on behalf of the subcontractor into any relevant environmental control procedures.

Subcontractor performance will be monitored during site inspections such as Consultative Inspection, Supervisor inspection or Task Observation to ensure that contracts are being fulfilled, and appropriate environmental management practices are being followed and are in accordance with Built's **'Project Environmental Aspects and Impacts Register' (Refer Attachment 1).**

14. Legal & Other Requirements

14.1. Legislative Compliance

Environmental

Environmental legislation applicable to the project is listed in the **'Environmental Legal Register' (Refer HSE-Plan Appendix 10 Project HSE Legal Register).**

Other Requirements:

- Environmental Management Plan Guideline – Guideline for Infrastructure Project – NSW DPHI, April 2020
- Building Code of Australia;
- Australian Building Greenhouse Rating;
- NSW Government Environment Guidelines;
- Green Star Rating;
- Road Transport (General) Amendment (Heavy Vehicle Driver Fatigue and Speeding
- Compliance) Regulation 2008;
- ANZECC Water Quality Guidelines;
- NSW Department of Housing's Managing Urban Stormwater (2004);
- Acid Sulphate Soils Management Advisory Committee;
- ANZECC Publication: Organochlorin Pesticides Waste Management Plan (1999);

14.2. Licenses & Approvals

Where Development Consents, permits or approvals relate specifically to the project, these issues will also be deemed as "significant" and will be included in the **Environmental Aspects and Impacts Register (Attachment 1).**

15. Contaminated Site Procedure

Projects undertaken on contaminated sites will undergo a Contaminated Site Assessment (CSA). CSA reports shall be provided as part of planning approvals process of a proposed development.

The CSA and associated approvals shall be reviewed and actioned by The Project Manager.

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

Where required, ITPs and/or other verification documentation shall be developed to address requirements of CSAs and to ensure verification of the works being completed as described.

The Site Manager will also ensure that on site workers are made aware of potential contamination issues associated with the contaminated site development. Advice shall be provided should problems be identified. The Site Manager will maintain spoil disposal records.

16. Monitoring

The Environmental Management Plan shall be monitored following implementation to ensure that:

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

Monthly reports are provided to the Construction Manager and General Managers for review. The performance of projects against company environmental objectives and targets is reviewed on a quarterly basis.

The Site Manager/Supervisor will ensure that environmental controls are inspected on a regular basis, as part of the site inspections described in the HSE Plan or as separate environmental inspections and are in accordance with the requirements outlined in the **'Project Environmental Aspects and Impacts Register.'**

Environmental inspections will be undertaken for the duration of the works to monitor performance outcomes. The type and frequency of environmental inspections will be determined by Built during the development of construction program and reflect the minimum requirements detailed in the table below:

Table 4: Inspection Type and Frequency

Inspection	Frequency	Responsibility
Surveillance by Site Supervisor	Daily	Built Site Supervisor
Daily / Shift Pre-start	Daily	Built Project Team
General Inspection	Daily	Built Project Team
Environmental Inspection	Weekly	Built Project Team
EMP (Plan and Implementation)	Quarterly	Built Environmental Advisor

17. Communication and Consultation

17.1. Training

All site personnel (including subcontractors) will receive Project-specific training in relation to environmental management prior to commencing works on site. The Project Manager is responsible for ensuring all personnel on site have received training.

Training will include:

- Site induction
    - Site environmental controls and rules
    - An outline of the CEMP requirements
    - Responsibilities and accountabilities of all site personnel regarding environmental management
    - Historic heritage management requirements, including awareness of the location of heritage buildings and no-go areas
    - Unexpected finds protocols
    - Site rules
    - Emergency / incident response processes including spills and soil management protocols
- If required, any other specific environmental training required to complete Project works.

Site personnel shall be trained in environmental aspects relevant to their role. Records of training shall be kept on site verifying competency in the management of environmental aspects of the Project. Training will be assessed and updated following any environmental incidents or updates / revisions to this CEMP.

Subcontractors shall be made aware of their responsibilities under environmental legislation, CoA requirements and this CEMP and any relevant supplementary plans.

Subcontractors will be requested to submit appropriate environmental control procedures or other information providing details of how they intend to manage environmental aspects and potential impacts of their work.

Subcontractor performance will be monitored during site inspections to ensure that contracts are being fulfilled, and appropriate environmental management practices are being followed and are in accordance with the Built's **Environmental Aspects and Impacts Register'** (Refer to Attachment 1).

17.2. Community Consultation

The Foreman shall conduct toolbox talks for Built employees and require Subcontractors to conduct toolbox meetings to address safety & environmental hazards relevant to their work activities.

Where work on site is likely to have an impact on adjoining neighbours, property owners/users the Project Manager will advise them of the nature and scope of works including any potential impacts. Notification shall be either via a letter box drop or special arranged consultation meetings. Where required, community consultation will be outlined further in the Community Consultation Plan.

17.3. External Stakeholders

External stakeholders in the project have been listed in the table below:

Agency/Company	Contact	Phone/Fax/Email
Department of Planning, Housing and Infrastructure (DPHI)	N/A	13 14 50
Transport for NSW (TfNSW)	N/A	1800 684 490
City of Sydney	N/A	02 9265 9333
Environment Protection Authority (EPA)	N/A	131 555
Sydney Water	N/A	132 092
Green Building Council Australia	Nick Baker	02 8239 6946
Office Environmental & Heritage	Siman Ahmad	02 9995 6946

17.4. Community Complaints

Community complaints shall be recorded on the project specific complaints register and actioned by the Project Manager. Any complaints received shall be actioned and closed out by the Project Manager or their nominee.

Remedial action must be taken as soon as practical. Any action taken shall be recorded on the form.

18. Emergency Planning & Response

Refer to the Emergency Plan in the relevant Appendices of the HSE Plan.

19. Incident Investigation & Reporting

19.1. Environmental Incidents

An environmental incident is defined within the Contract as "*Any Environmental Harm or Contamination arising out of or in connection with the Contractor's Activities or the Works*". Examples of an environmental incident may include:

- Uncovering of unexpected Asbestos Contaminated Material (ACM) or other contamination such as heavy metals;
- hazardous substance spills;
- discovery of unexpected habitat;
- relocation of snakes from the works site;
- Complaint from stakeholders or community regarding excess noise or dust coming from the site;
- Failure of erosion control or sediment control systems, resulting in materials entering the stormwater system; or
- Environmental mismanagement by a subcontractor.

Any suspected Environmental Incident is to be reported immediately to the Project Manager who will in turn advise (in writing) the Client and Planning Secretary within seven days of becoming aware of an incident.

As set out in Appendix 2 of the consent the written notification of the incident will include the below:

- identify the development and application number;

- provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- identify how the incident was detected;
- identify when the applicant became aware of the incident;
- identify any actual or potential non-compliance with conditions of consent;
- describe what immediate steps were taken in relation to the incident;
- identify further action(s) that will be taken in relation to the incident; and
- identify a project contact for further communication regarding the incident.

Within 30 days of the incident occurring an incident report will be submitted to the Planning Secretary and any relevant public authorities addressing the below requirement:

- a summary of the incident;
- outcomes of an incident investigation, including identification of the cause of the incident;
- details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- details of any communication with other stakeholders regarding the incident.

19.2. Duty to Notify Department of Pollution Incident

Built shall notify the (EPA Pollution Line: 131 555) regarding pollution incidents that have occurred in the course of its activities, if the following apply:

The actual or potential harm to the health or safety of human beings or ecosystems is not trivial,

The actual or potential loss or property damage (including clean-up costs) associated with a pollution incident may exceed $10,000.

20. Audits

Projects audits shall be scheduled by the Regional HSE Manager and form part of the company's audit schedule. Refer to clause 36.0 Audits of the HSE Plan.

Audits shall address the requirements of ISO9001, ISO14001, AS4801, Built's Management System and the various Management Plans.

Attachment 1 – Environmental Aspects and Impacts Register

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
Dust Generation Particulate Emissions (General)	Air pollution	Med	• Install shade cloth on perimeter fencing or timber hoardings • Vehicle corridors will be clearly identified and restricted to control vehicle access onsite. • Limit vehicle speed onsite to a maximum of 5km/hr • Fixed or mobile (water tanker) water sprays on haul roads during earthworks activities. • Reduce dust generating activities during high wind velocity periods. • Maintain equipment. Smokey plant to be stopped until repair works completed. • Turn off vehicle engines whilst not in use (no long periods of idling) • Ongoing air quality monitoring to be undertaken during dust generating works.	Daily	Built & Subcontractor
Dust Generation (Demolition)	Air pollution	Med	• Breakers and crushing equipment to be fitted with dust filtration equipment or water sprays to control dust emissions.	Daily during demolition and tunnelling phase	Built & Subcontractor
Dust Generation (Construction)	Air pollution	Med	• Minimise areas of site disturbed, and stage works where possible. • Dust suppression strategies to be used, e.g.. water sprays, soil binders, hydro mulching, controlled speed onsite, roadbase + shaker grids, sealed areas where possible. • Stockpiled topsoils and rubble will be restricted to 4m high. Stabilise if insitu for >4-6months. • On site drilling or coring operations will be undertaken by either using wet methods or on-tool dust collectors with HEPA filters or on-tool dust extraction system connected to an H/M class industrial vacuum cleaner. • Ongoing monitoring to be undertaken.	Daily	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
Dust Generation (Tunnelling Works)	Air pollution	Med	• Permit to tunnel to be completed prior to commencement of tunnelling works on an as required basis. • Access to work area restricted to Tunnelling Subcontractor staff. • Exclusion zones to be in place. • Dust barrier walls to be installed to separate the tunnel work zone from the rest of the site. • Dust extraction system to be operational during the tunnelling works. • Dust suppression strategies to be used i.e. wet drilling/cutting methods, water sprays • Workers to wear a minimum of P2 face fit tested masks at all times within the work zone • Air monitoring for Respirable Crystalline Silica (RCS) and Diesel Particulate Matter (DPM) to be carried out on an as required basis (as determined by the independent hygienist). • Maintain equipment. Smokey plant to be stopped until repair works completed. • Turn off vehicle engines whilst not in use (no long periods of idling).	Daily during tunnelling phase	Built & Subcontractor
Odour	Air pollution Odour	Med	• If odorous materials uncovered during earthworks, recover immediately. • Seek advice from consultant regarding soil /materials management.	As required	Built & Subcontractor
ESD Ratings	Resource use Air pollution Global warming	Low	• Materials to be used on site must be submitted to BOJV for pre-approval. • Low VOC paints, adhesives, and sealants to be used exclusively. • Engineered wood products to be E0. • PVC Pipes, conduit, cables to be Best Practice PVC or non-PVC (e.g. Low Smoke Zero Halogen LSZH) • Regular site inspections to verify materials compliant. • All Fuel and Energy usage data to be logged in NGERS tracking sheet.	Prior to order of materials	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
			• Construction Indoor Air Quality Management Plan to be implemented once building enclosure is complete. • All new and existing ductwork must be wrapped and protected and cleaned prior to PC/occupation		
Emissions to Air	Air pollution	Low	• Ensure machinery is maintained correctly	Daily	Built & Subcontractor
Greenhouse	Resource use Air pollution Global warming	Low	• Ensure purchased electrical products/whitegoods products comply with specification for CFCS & energy ratings • Low solvent paints to be used as a priority • Building to conform to NABERS or Green Star performance criteria • Deliveries / transport from site effectively planned to limit inefficient transport, assist back loading etc	Prior to order of materials	Built & Subcontractor
Stormwater (Discharge from sedimentation basins, flooding)	Water contamination	Med	• Water quality to meet ANZECC Water Quality Guidelines. – PH 6.5- 8.5, Turbidity <50NTU, No visible oil & grease • Obtain advice for use of flocculants to settle sediment from water. • Sedimentation control points to be maintained to ensure capacity during rainfall event. • **DO NOT DISCHARGE IF CONTAMINANTS SUSPECTED.** Obtain advice.	Prior to discharge	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
Adjoining waterways (dewatering, soil erosion & runoff)	Water contamination, Erosion	Low	• Temporary drainage systems will be established to divert clean waters around the land development areas as appropriate. • Erect silt fences, bunds and construct swale drains as per the sediment erosion and control plan. • Inspect at least weekly & after rainfall during earthworks. • Maintain and/or replace as required. • Install erosion and sediment controls before work starts. • Where trees are retained on site, Install temporary fences to define 'no go' areas in those areas that are not to be disturbed. Include the area under the canopy of trees so that tree roots will not be damaged by soil compaction. • Divert run-off from upslope away from the site, but ensure that you do not flood your neighbours. For example, dig drainage channels (catch drains sized to accommodate the upslope catchment). • Install sediment controls downslope of the site to catch sediment. • Check the erosion and sediment controls and keep them in good condition. • Limit vehicle entry and exit to one point, with stabilised access. • Clearly mark the access point and give an access map to all suppliers. • Protect all drains with erosion and sediment controls. For example, a gravel sausage made from geotextile filled with blue metal. • Store all stockpiles and building materials behind sediment fences. Cover them with geotextile or plastic where appropriate to prevent erosion by wind. • Connect downpipes from the guttering to the stormwater drain as soon as the roof goes on. • Establish bunding below the area used for cutting tiles, concrete and bricks. • Surround the wash-out area with a sediment fence that slows down the water flow. Site this area upslope of another sediment control during earthworks where appropriate • Fill in all trenches immediately after services have been laid.	Daily Surveillance Weekly Environmental Inspections	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
			• Remove the sediment and erosion controls only after this is done. • Sweep the road and footpath as required. Washing down of external roads and footpaths is unacceptable. • Never place any materials in the gutter or on the road. You will be fined for this. • Off site water discharge is to be implemented per the dewatering management plan. • HSE-087 Permit to Pump Site Water is to be approved by Built before water is pumped from the site		
Sewer (Trade waste)	Water pollution	Med	• No paints or other chemical to be poured down drains. • If required, obtain trade waste licence for discharge or Sydney Water / local council approval	Daily Surveillance & Weekly Environmental Inspections during fitout and painting phase	Built & Subcontractor
Land	Contaminated waterways Soil contamination	Med	• If odorous soils (rotten egg gas) or grey/yellowed mottled soils encountered, stop work. • If suspected, consultant to prepare Acid Sulphate Soil Management Plan (ASSMP). • Excavation and neutralisation to be supervised by consultants as per ASSMP.	As required. No soil contamination identified onsite.	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
			• The requirements to **permanent import fill** will be minimised by utilising on site cut material wherever possible. • All analysis certificates shall be handed over as part of the completion documents to the client. • Record all imported fill on Form HSE-066 Imported Fill Register. • Mark up locations where fill compacted in site plan. Survey if required		
Resources – water, materials, energy	Resource use Landfill Air pollution	Med	• For design and construct jobs, refer to the design specification for ESD requirements and product choices. • Buy local wherever possible to reduce impacts of transport on environment.	Prior to order of materials	Built & Subcontractor
Noise	Community complaints	Med	• Refer to DA for noise restrictions and working hours. • Use hoarding or acoustic mats as required. • Situate generators and plant away from sensitive receivers. • Turn off machinery. Maintain equipment and stop noisy plant until repaired. • No early deliveries unless required under Condition F6. • Noise monitoring being carried out onsite.	Weekly Environmental Inspections & On receipt of community complaints	Built & Subcontractor
Vibration	Community complaints, Damage to structures	Med	• Conduct dilapidation report prior to work starting. • Limit the use of vibratory rollers, rock breakers, impact piling etc adjacent to buildings. • Regenerated noise may also transfer through bedrock and building structures. • Obtain advice if required • Noise and vibration monitoring being carried out on site	Weekly Environmental Inspections & On receipt of community complaints	Built & Subcontractor
Community	Community Concerns Noise	Low	• Develop a Communications Strategy with the client team for the project. • Provide information (e.g., Signage, letterbox drops) to community on programmed works	On receipt of community complaints	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
	Restricted access		• Provide contact name for inquires. • Advice locals of "noisy" work. • If required in noise sensitive areas and/or in response to complaints, engage consultants to undertake monitoring at nominated receivers. • Vehicles will not be permitted to queue outside the site or in residential areas unless a defined area is established which does not adversely impact on neighbours. • All community complaints to be logged in project specific complaints register and actioned by the Project Manager. • Where required, ensure temporary lighting is provided in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;		
Flora	Destruction of flora Erosion	Low	• No flora is present within the site.	N/A	N/A
Fauna	Destruction of fauna	Low	• All native animals protected. • Review planning documentation to determine the presence of any protected, threatened or significant fauna. Obtain approvals as required. • Site rules/induction to include information where required • For injured animals, to relocate call WIRES	As required	Built & Subcontractor
Waste **Litter**	Landfill Contamination of waterways Soil contamination	Med	• Materials to be removed prior to demolition • Registers and waste disposal requirements as per State/Territory WHS/OHS Regulator and DECC/EPA requirements for removal, storage, transport and disposal. • General site wastes –use one bin system and sort in contractors' yard to produce quantities of material for recycling, reuse, disposal etc. • Empty drums are to be taken off-site for disposal. • Empty drums shall be crushed prior to recycling/disposal.	Daily Surveillance & Weekly Environmental Inspections	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
			• Do not overfill skip bins. Provide plenty for use. Cover where potential for windblown litter.		
Landfilling	Landfill Contamination of waterways Soil contamination	Med	• Reduce, reuse and then dispose • Dispose of hard construction wastes for recycled gravels and sands • Do not send soil to landfill until alternatives for beneficial reuse have been explored as per consultants advice. • Consideration should be given to chipping of the vegetation and reuse • Reuse packaging to protect works	Weekly Environmental Inspections	Built & Subcontractor
Chemicals	Contamination of waterways Soil contamination Fumes Worker safety	Med	• Chemicals to be **stored** in bunded areas (impervious + 110% of largest container) away from stormwater drains & pits. • Refer State/Territory WHS/OHS Regulator Code of Practice for Storage & Handling of Dangerous Goods, DECC Guidelines for Bunding & Spill Management. Appropriate chemicals storage is in conformance with: – AS 1940 The Storage and Handling of Flammable and Combustible Liquids – Storage and Handling of Dangerous Goods State/Territory WHS/OHS Regulator Code of Practice 2005– refer p. 86 • • **Fuel and hydraulic leaks** to be cleaned up immediately. • **Drilling muds** to be contained within bunds and reused. • **Liquid paints** NOT to be poured down drains.. Paint brushes to be rinsed and paint solids allowed to settle. Container of paint solids to be disposed to liquid waste facility. • Construct **concrete washout** pit / provide lined bins for washout, away from stormwater drains. Send back to batch plant where possible. • **Concrete cuttings** to be contained and wet vac to prevent runoff into stormwater drains. • Storage of **bulk fuels** (>200L) on site is prohibited unless they are stored in self-bunded tanks (double-walled tanks).	Daily Surveillance Weekly Environmental Inspections Quarterly EMP Audits	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
			Alternatively all refuelling shall be undertaken by a mobile facility with appropriate spill control and containment control equipment. • SDS's must be provided to the Site Supervisor prior to a chemical being received on site and by subcontractors using chemicals/products.		
Traffic	Site access restrictions Community safety Pollution	Med	• Develop and implement traffic management plans. Submit to local council as required. • Signage and notices regarding disruptions. • Install shakers and wheel wash as required during earthwork activities. • Organise regular street sweeping. • Haulage routes and rules will be provided to subcontractors prior to commencing on site. • All loads of soil, demolition wastes, general wastes etc are to be tarped	Daily Surveillance/General Inspections	Built & Subcontractor
Hazardous Materials (Lead paint)	Air contamination Contaminated waterways Soil contamination	High	• If disturbing or removing dust or paint that could contain lead, wear a respirator or dust mask and protective clothing. • Seal the rooms with plastic. • Do not use open-flame torches on lead paint as they create lead fumes. If you must use a heat gun, use it on the lower setting to keep the paint temperature below 370 degrees C. • Avoid using dry-sanding techniques: keep the surface wet to minimise dust. • Don't sweep or use a domestic vacuum cleaner to clean up; lead dust will pass right through it. Use a high-efficiency particulate air (HEPA) vacuum cleaner. These can be hired. • When finished, wipe all surfaces with a damp cloth and high-phosphate detergent. • Wash face and hands before eating, drinking or smoking. • Refer to **Lead Safe: A Renovator's Guide to the Dangers of Lead** and the Australian Standard AS4361.2 Guide to Lead Paint Management: Part 2 Residential and Commercial Buildings 1998	Daily Inspections during hazmat removal works	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
Hazardous Materials (Asbestos)	Worker health Air contamination Contaminated waterways Soil contamination	High	• A licence subcontractor must be used to demolish, remove, repair or disturb asbestos. • A State/Territory WHS/OHS Regulator asbestos licence is required to remove 10 square metres or more of bonded asbestos • A State/Territory WHS/OHS Regulator licence is required to remove, repair or disturb friable asbestos	Daily Inspections during hazmat removal works	Built & Subcontractor
European heritage	Destruction of heritage items	Low	• Education and training at site toolbox meetings or induction. • **It is illegal to destroy heritage items without approval.** • Heritage management plan to be developed and implemented for demolition and earthworks. • Follow the unexpected finds protocols in the heritage management plan if any heritage relics or sites discovered during construction	Daily Surveillance	Built & Subcontractor
Aboriginal heritage	Destruction of heritage items	Med	• Education and training at site toolbox meetings or induction. • **It is illegal to destroy heritage items without approval.** • Also check the register of the National Estate. • Obtain approval from NPWS (Section 90 consent) if required • Follow the unexpected finds protocols in the heritage management plan if any evidence of Aboriginal sites / artifacts are discovered during construction	Daily Surveillance	Built & Subcontractor
Emergency Preparedness	Worker health Air contamination	Med	• Spill kit onsite. • Refer to the SDS for advice and procedures. • All spills must be reported to the Site Manager & cleaned up. **Complete BUILT Accident /Incident report.** • Sediment controls regularly to maintain capacity in case of emergency •	Daily Surveillance Weekly Environmental Inspections	Built & Subcontractor

Environmental Aspect	Environmental Impact	Risk Rating (Risks ranked as 'High' or 'Med' are deemed significant)	Environmental Actions, Controls and Criteria	Monitoring Frequency	Responsibility
	Contaminated waterways Soil contamination				

Environmental Aspects and Impacts Risk Assessment Matrix

Consequence (severity) – Is How Serious Could the Environment Be Harmed		Likelihood – is an estimate of how probable it is for the environmental hazard to occur leading to environmental harm.		
		Very Likely (VL)	Possible (POS)	Very Unlikely (VU)
HIGH SEVERITY (H) • Irreversible damage to the environment • Extensive damage to the environment e.g., large area of contamination (costs exceeding > $500k • Court proceedings leading to prosecution and significant fine • Damage to Built's reputation as a result of widespread adverse publicity	RISK LEVEL	HIGH	HIGH	MEDIUM
MEDIUM SEVERITY (M) • Temporary harm to the environment e.g., small area of contamination but no ongoing long-term damage • Clean-up costs < $250k • Low level fine • No adverse media publicity on a significant level		HIGH	MEDIUM	LOW
LOW SEVERITY (L) • Minor harm to the environment e.g., small scale spill readily mitigated/cleared; Noise complaint from adjoining property		MEDIUM	LOW	LOW

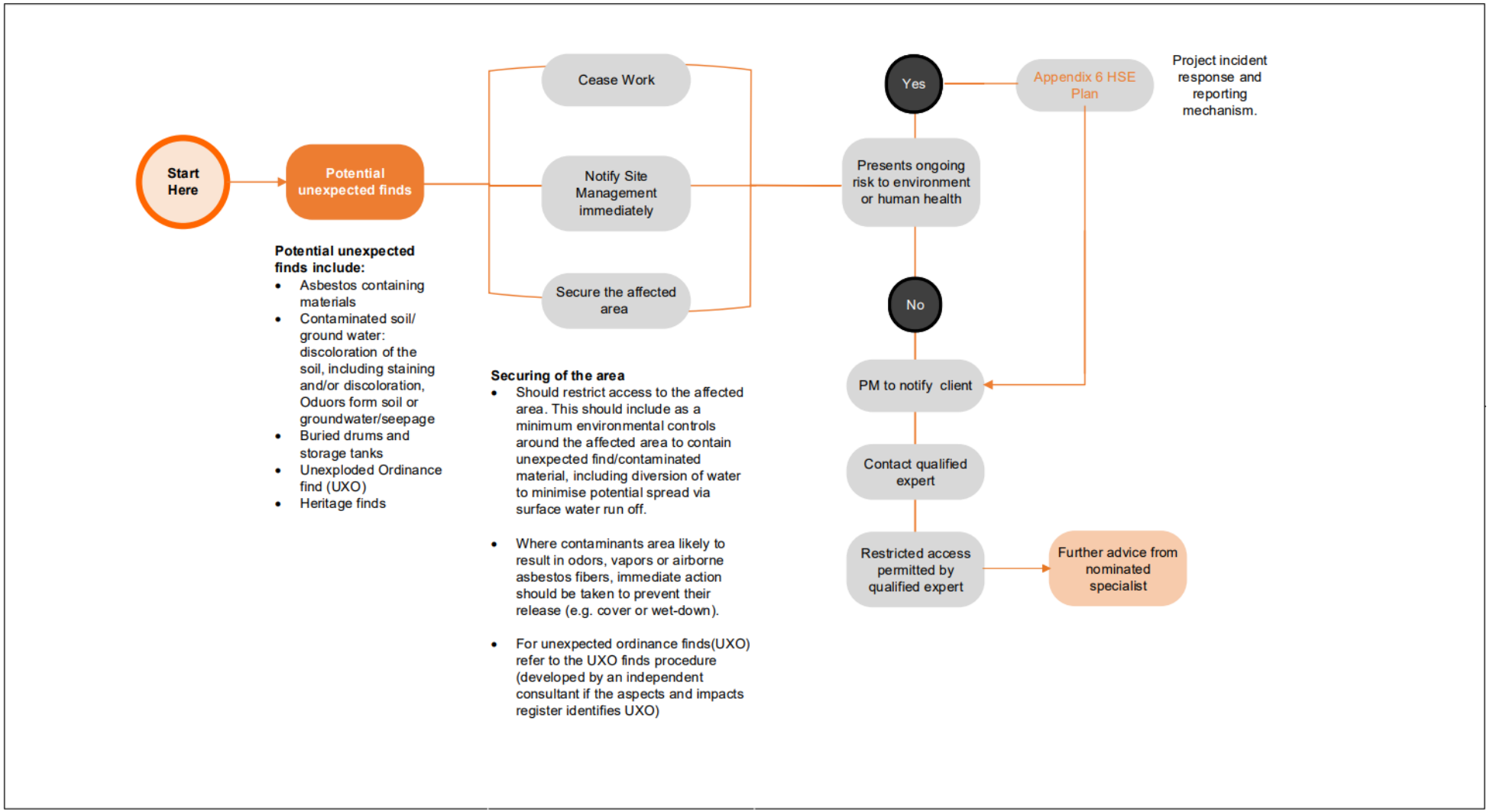
RISK LEVEL	**HIERARCHY OF CONTROL**
	Order of priority in the selection of controls corresponding to level of risk (Acceptable Risk Treatment)
High Risk – Action must be taken to eliminate the risk to the environment **Medium Risk** – if the risk to the environment cannot be eliminated so far as is reasonably practicable or minimised so far as is reasonably practicable by implementing control measures listed as 2nd, 3rd, or 4th (in this order of priority) **Low Risk** – if the risk to the environment cannot be eliminated so far as is reasonably practicable or minimised so far as is reasonably practicable by implementing control measures listed as 2nd, 3rd, 4th or 5th (in this order of priority) then administrative controls may be applied	• 1st Elimination - i.e., the permanent removal of the hazard • 2nd Substitution - substituting (wholly or partly) the hazard giving rise to the risk with something that gives rise to a lesser rise • 3rd Isolation - isolating the source of the hazard that poses a threat to the environment • 4th Engineering - controls to reduce the risk to the environment • 5th Administrative - procedural controls to eliminate or reduce the risk of environmental contamination

Risks levels (i.e., Consequence and Likelihood) in relation to environmental Aspects and Impacts rated as 'High' or 'Medium' are considered 'Significant' as they have the potential to adversely impact on the environment, result in additional costs to and potential fines or damage the company's reputation. Where an environmental aspect results in a positive impact on the environment (e.g., waste elimination or waste re-use) these are considered to also be significant.

Attachment 2 – Unexpected Finds Procedure

Unexpected Finds Protocol

1. Cease work, turn off machines / vehicles and notify all personnel in nearby area
2. Clear area of personnel (and machinery / vehicles if required and safe to do so without disturbing unexpected find) within a 10-metre radius
3. Advise workers of suspected unexpected find and type (i.e. Aboriginal heritage item, unexpected contaminated soil (including PFAS), unexpected asbestos, unexpected flora / fauna)
4. Contact HSE Manager, Project Manager or Construction Manager immediately
5. Erect barricade to isolate the area and prevent entry if safe to do so without disturbing the item (ensuring buffer of at least 10 metres between potential object / aspects and barrier where possible)
6. HSE Manager / Project Manager / Construction Manager to contact client and any relevant public authority to notify of unexpected find
7. Contact qualified expert (Historic/Aboriginal Archaeologist/Site officer for Heritage Find, Ecologist for protected flora/fauna, Fauna Handler, Licensed Asbestos Assessor for any Hazmat, Environmental Scientist for potential contaminated soils)
8. No person shall enter the barricaded area unless expressly permitted by the qualified person
9. Sampling / inspection to be undertaken to confirm find (for Aboriginal heritage item, photographs of discovery sent to Historic/Aboriginal Archaeologist/Site officer Archaeologist)
10. Nominated specialist to advise of further management actions necessary based on an available information
11. Obtain necessary Client and DPHI approval prior to carrying out any additional actions (such as protection measures for protected item)
12. Do not recommence construction works in area until instructed to do so
13. HSE Manager to record incident in Incident Register and complete Environmental Incident Reporting and Management Form
14. Ensure inductions are reviewed, and toolbox talks, and pre-start content is circulated post-event to capture any lessons learnt


Start Here
Potential unexpected finds
Cease Work
Notify Site Management immediately
Secure the affected area
Potential unexpected finds include:
Asbestos containing materials
Contaminated soil/ ground water: discoloration of the soil, including staining and/or discoloration, Oduors form soil or groundwater/seepage
Buried drums and storage tanks
Unexploded Ordinance find (UXO)
Heritage finds
Securing of the area
Should restrict access to the affected area. This should include as a minimum environmental controls around the affected area to contain unexpected find/contaminated material, including diversion of water to minimise potential spread via surface water run off.
Where contaminants area likely to result in odors, vapors or airborne asbestos fibers, immediate action should be taken to prevent their release (e.g. cover or wet-down).
For unexpected ordinance finds(UXO) refer to the UXO finds procedure (developed by an independent consultant if the aspects and impacts register identifies UXO)
Yes
Appendix 6 HSE Plan
Project incident response and reporting mechanism.
Presents ongoing risk to environment or human health
No
PM to notify client
Contact qualified expert
Restricted access permitted by qualified expert
Further advice from nominated specialist