


This is a subordinate management plan to be used in conjunction with the Project Management Plan

Sydney Metro Package 5

Customer: Sydney Metro

Contract Number: Package 5: Punchbowl, Dulwich Hill, Campsie

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00	13/11/2020	For Review	For External Consultation
01	18/01/2021	For Review	Revised in response to ER and internal comments
02	23/02/2021	Final	Revised in response to DPE comments
03	30/03/2021	For Review	Integrate Downer EMS
04	18/05/2021	For Review	Revised in response to ER and internal comments
05	11/08/2021	Final	Revised in response to Sydney Metro comments
06	23/02/2022	For Review	6 monthly update and incorporate revised risk assessment
07	23/03/2022	For Review	Update in response to comments from Sydney Metro and ER
07.1	15/09/2022	Final	6 monthly review – no update to the document required
07.2	20/03/2023	Final	6 monthly review – no update to the document required

Table of contents

1.	Introduction	12
1.1.	Scope of works	13
1.2.	Purpose of this CEMP.....	19
1.2.1	Document Scope (Alignment to Downer ISO 14001:2015)	22
1.2.2	Referenced Documents	23
1.3.	Environment and sustainability policy statement	26
1.3.1.	Sydney Metro Environment and Sustainability Statement of Commitment	27
1.4.	Objectives and targets	27
2.	Legal and approval requirements	33
2.1.	Environmental planning approval process background	33
2.2.	Approval and licencing requirements	33
2.3.	Relevant legislation.....	34
2.4.	Additional environmental assessment.....	34
2.5.	Standards and codes.....	35
2.6.	Environment Protection Licence.....	36
3.	Environmental management plan	37
3.1.	Preparation and availability of the CEMP	37
3.1.1.	Preparation	37
3.1.2.	Availability.....	37
3.2.	Planning.....	38
3.2.1.	Compliance tracking	38
3.2.2.	Environmental objectives and targets.....	38
3.2.3.	Environmental Work Method Statement and Environmental Control Maps	38
3.3.	Resources, responsibilities and authority	40
3.4.	Selection and management of subcontractors	46
3.5.	Competence, training and awareness.....	47
3.5.1.	Environmental induction.....	48
3.5.2.	Toolbox talks, training and awareness	49
3.5.3.	Daily pre-start meetings	50
3.6.	Working hours.....	50
3.7.	Communication.....	52
3.8.	Emergency and incident response	54
3.8.1.	General emergency and incident response	55
3.9.	Monitoring, inspections and auditing	56
3.9.1.	Environmental inspections	56
3.9.2.	Environmental monitoring	61
3.9.3.	Auditing.....	61
3.9.4.	Construction phase compliance tracking.....	62
3.10.	Environmental incidents non-conformances and non-compliances	64

3.10.1.	Environmental incidents under Sydney Metro	64
3.10.2.	Review of compliance	67
3.10.3.	Department of Planning and Environment incident notification.	68
3.11.	Work in environmentally sensitive areas	69
3.12.	Ancillary site facilities	69
3.12.1.	Ancillary facilities approval pathways	69
3.12.2.	Boundary screening approach	70
3.13.	Hold points.....	70
3.14.	Restoration of sites	72
3.15.	Records of environmental activities.....	73
3.15.1.	Environmental records	73
3.15.2.	Document control.....	73
3.16.	Management review.....	74
3.17.	CEMP/Sub-plan revision and changes to the Project	75
3.17.1.	CEMP revision	75
3.17.2.	Changes to the Project.....	76
4.	Environmental management documentation	77
4.1.	Noise and vibration	77
4.2.	Soil and water	78
4.3.	Heritage	78
4.4.	Waste and spoil	78
4.5.	Visual Amenity	78
4.6.	Traffic	78
4.7.	Other aspects	78
4.8.	Sustainability	79
	Appendix A: Compliance Matrix.....	80
	Appendix B: Legal and Other Requirements.....	99
	Appendix C: Risk Assessment.....	104
	Appendix D: Downer and Sydney Metro Environment and Sustainability Policies, Sydney Metro Environment and Sustainability Commitments and Downer ISO 14001:2015 Certification.....	120
	Appendix E: Environmental Procedures	122
	Weed management	128
	Tree Protection Zone (TPZ)	128
	Appendix F: Sydney Metro Environmental Incident and Non-compliance Reporting Procedure	143
	Appendix F(a): Sydney Metro Environmental Incident Notification Process for Class 1 and 2 Incidents	144
	Appendix F(b): Sydney Metro Environmental Incident and Non-Compliance Report Template	145
	Appendix G: Noise and Vibration Management Plan.....	146

(Uncontrolled when printed)

Appendix H: Soil and Water Management Plan	148
Appendix I: Heritage Management Plan	149
Appendix J: Indicative Training Matrix	150
Appendix K: Indicative Audit Schedule	151

Figures

Figure 1 Sydney Metro route map	12
Figure 2 Sydney Metro Dulwich Hill Station upgrades	16
Figure 3 Sydney Metro Campsie Station upgrades	17
Figure 4 Sydney Metro Punchbowl Station upgrades	18
Figure 5 CEMF Applicability to the Project	20
Figure 6 Organisation chart.....	46
Figure 7 Environmental incident notification process for Class 1 and 2 Incidents	66
Figure 8 CEMP structure overview	77

Tables

Table 1 CEMP CoA compliance matrix	8
Table 2 CEMP CEMF compliance matrix	10
Table 3 Temporary Construction facilities.....	19
Table 4 Objectives and targets.....	29
Table 5 Approval / licence requirements	34
Table 6 Applicable standards and codes.....	35
Table 7 Roles and responsibilities.....	40
Table 8 Summary of Construction phase environmental monitoring required by the Project approval.....	61
Table 9 Classification System for Environmental Incidents.....	64
Table 10 Incident notification to DPE.....	68
Table 11 Hold points	70

Document Control

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07.1	15 September 2022	6 monthly review – no update to the document required
07.2	20 March 2022	6 monthly review – no update to the document required

Terms and Definitions

Terms	Definitions
AARD	Archaeological Assessment and Research Design report
AS	Australian Standard
ASS	Acid Sulfate Soils
BC Act	Biodiversity Conservation Act 2016 (NSW)
CCS	Community Communication Strategy
CEMF	Construction Environmental Management Framework
CEMP	Construction Environmental Management Plan
CNVIS	Construction Noise and Vibration Impact Statement
CoA	Conditions of Approval
CoCB	City of Canterbury-Bankstown Council
CSR	Combined Services Route
CSSI	Critical State Significant Infrastructure
CTMP	Construction Traffic Management Plan
CTR	Compliance Tracking Review
Cwth	Commonwealth
dB	Decibels
DECC	NSW Department of Environment and Climate Change
DPI	NSW Department of Primary Industries
DPE	Department of Planning and Environment
EAP	Environmental Audit Program
ECM	Environmental Control Map
EES	NSW Environment, Energy and Science (formerly OEH)
EIN	Environmental Improvement Notice
EIS	Environmental Impact Statement
EP&A Act	Environment Planning and Assessment Act 1979 (NSW)
EPA	NSW Environment Protection Authority
EPBC Act	Environment Protection and Conservation Act 1999 (Cwth)
EPL	Environment Protection Licence under the POEO Act
EMS	Environmental Management System
EMP	Environmental Management Plan
EPO	Environmental Performance Outcome
ER	Environmental Representative
ESCP	Erosion and sediment control plan
EWMS	Environmental Works Method Statement
E&SMS	Environment and Sustainability Management System
FFMP	Flora and Fauna Management Plan
GREP	Government Resource Efficiency Policy

Terms	Definitions
HMP	Heritage Management Plan
ICNG	Interim Construction Noise Guideline
IMS	Integrated Management System (aligned to both Sydney Metro and Downer)
ISO	International Standardization Organisation
IWC	Inner West Council
KPI	Key Performance Indicator
LV	Low Voltage
Minister, the	The Minister of New South Wales (NSW) Planning
NML	Noise Management Level
NSW	New South Wales
NVMP	Noise and Vibration Management Plan
OCCS	Overarching Community Communication Strategy
OOHW	Out-of-Hour Works
PASS	Potential Acid Sulfate Soils
POEO Act	Protection of the Environment Operations Act 1997 (NSW)
Proponent	The person or organisation identified as the proponent in Schedule 1 of the planning approval. In this case Sydney Metro Authority
QMP	Quality Management Plan
RBL	Rating Background Level
REMM	Revised Environmental Mitigation Measure
RMS	NSW Roads and Maritime Services
ROL	Road Occupancy Licence
SCO	Sydney Coordination Office
Planning Secretary	The Secretary of the Department of Planning and Environment
SDG	TfNSW Sustainable Design Guidelines (Version 4)
SM	Sydney Metro Authority
SMP	Sustainability Management Plan
SMSP6	Sydney Metro Stations Package 6
SPIR	Submissions and Preferred Infrastructure Report
SSI	State Significant Infrastructure
SWM	Southwest Metro
SWMP	Soil and Water Management Plan
SWMS	Safe Works Method Statement
TfNSW	Transport for New South Wales
UCM	Utilities Coordination Manager
VAMP	Visual Amenity Management Plan
WFDIP	Workforce Development and Industry Participation Plan

Construction Environmental Management Plan Compliance matrix

The Conditions of Approval (CoA) relevant to this Construction Environmental Management Plan (CEMP) are listed in Table 1. In accordance with CoA C1, the relevant requirements of the Sydney Metro City and Southwest Construction Environmental Management Framework (CEMF) have also been included in Table 1. This table also provides a cross reference to demonstrate where the relevant requirement is addressed in this CEMP, or other management documents.

Table 1 CEMP CoA compliance matrix

Condition	Condition Requirements	Document Reference															
Conditions of Approval SSI-8256																	
C1	A Construction Environmental Management Plan (CEMP) must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during Construction.	This document fulfils the requirements of C1. The Compliance Matrix in Appendix A tracks these requirements.															
C2	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.	Section 1.2															
C3	<p>The CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan and be consistent with the CEMF and CEMP referred to in Condition C1:</p> <table border="1"> <thead> <tr> <th>ID</th> <th>Consultation required for CEMP Sub-plans</th> <th>Relevant Government Agencies to be consulted for CEMP Sub-plans</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>Noise and Vibration</td> <td>Relevant Council(s)</td> </tr> <tr> <td>b)</td> <td>Soil and Water</td> <td>Relevant council(s), DoI, OEH</td> </tr> <tr> <td>c)</td> <td>Waste and Spoil</td> <td>Relevant council(s)</td> </tr> <tr> <td>d)</td> <td>Heritage</td> <td>Heritage Council (or its delegate) and relevant council(s)</td> </tr> </tbody> </table>	ID	Consultation required for CEMP Sub-plans	Relevant Government Agencies to be consulted for CEMP Sub-plans	a)	Noise and Vibration	Relevant Council(s)	b)	Soil and Water	Relevant council(s), DoI, OEH	c)	Waste and Spoil	Relevant council(s)	d)	Heritage	Heritage Council (or its delegate) and relevant council(s)	<p>Refer to relevant Sub-plans.</p> <p>Note: in accordance with the Sydney Metro City & Southwest - Sydenham to Bankstown Staging Report a Waste and Spoil Sub-plan is not required. As such, consultation in accordance with C3(c) is not required.</p> <p>Waste and Spoil is addressed within a procedure, refer to Appendix E.</p>
ID	Consultation required for CEMP Sub-plans	Relevant Government Agencies to be consulted for CEMP Sub-plans															
a)	Noise and Vibration	Relevant Council(s)															
b)	Soil and Water	Relevant council(s), DoI, OEH															
c)	Waste and Spoil	Relevant council(s)															
d)	Heritage	Heritage Council (or its delegate) and relevant council(s)															
C4	The CEMP Sub-plans must be prepared in accordance with the CEMF .	Refer to the Project's Noise and Vibration Management Plan, Soil and Water Management Plan and Heritage Management Plan.															
C5	Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation, including copies of all correspondence from those agencies, must be provided with the relevant CEMP Sub-Plan	Refer to the Project's Noise and Vibration Management Plan, Soil and Water Management Plan and Heritage Management Plan.															
C6	Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before Construction.	Section 1.2															
C7	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The	Section 1.2															

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Condition Reference	Condition Requirements	Document Reference									
	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 CEMP Sub-plans for that stage have been approved by the Planning Secretary										
C8	<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 predicted performance.</p> <table border="1"> <thead> <tr> <th>ID</th> <th>Consultation required for Construction Monitoring Programs</th> <th>Relevant Government Agencies to be consulted for Construction Monitoring Programs</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>Noise and Vibration</td> <td>Relevant Council(s)</td> </tr> <tr> <td>b)</td> <td>Water Quality</td> <td>Relevant council(s)</td> </tr> </tbody> </table>	ID	Consultation required for Construction Monitoring Programs	Relevant Government Agencies to be consulted for Construction Monitoring Programs	a)	Noise and Vibration	Relevant Council(s)	b)	Water Quality	Relevant council(s)	Refer to the Project's Noise and Vibration Management Plan and Soil and Water Management Plan.
ID	Consultation required for Construction Monitoring Programs	Relevant Government Agencies to be consulted for Construction Monitoring Programs									
a)	Noise and Vibration	Relevant Council(s)									
b)	Water Quality	Relevant council(s)									
C9	<p>Each Construction Monitoring Program must provide:</p> <ul style="list-style-type: none"> a) details of baseline data available; b) details of baseline data to be obtained and when; c) details of all monitoring of the project to be undertaken; d) the parameters of the project to be monitored; e) the frequency of monitoring to be undertaken; f) the location of monitoring; g) the reporting of monitoring results; h) procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory; and i) any consultation to be undertaken in relation to the monitoring programs. 	Refer to the Projects' Noise and Vibration Management Plan and Soil and Water Management Plan.									
C10	The Construction Monitoring Programs must be developed in consultation with relevant government agencies as identified in Condition C8 of this approval and must include reasonable information requested by an agency to be included in a Construction Monitoring Programs during such consultation. Details of all information requested by an agency including copies of all correspondence from those agencies, must be provided with the relevant Construction Monitoring Program.	Refer to the Project's Noise and Vibration Management Plan and Soil and Water Management Plan.									
C11	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.	Refer to the Project's Noise and Vibration Management Plan and Soil and Water Management Plan.									
C12	Construction must not commence until the Planning Secretary has approved all of the required Construction Monitoring Programs.	Refer to the Project's Noise and Vibration Management Plan and Soil and Water Management Plan.									
C13	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.	Refer to the Project's Noise and Vibration Management Plan and Soil and Water Management Plan.									
C14	The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.	Refer to the Project's Noise and Vibration Management Plan and Soil and Water Management Plan.									

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Condition Reference	Condition Requirements	Document Reference
C15	Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.	Refer to the Project's Noise and Vibration Management Plan and Soil and Water Management Plan.

Table 2 CEMP CEMF compliance matrix

Clause	Requirement	Document Reference
Construction Environmental Management Framework		
3.3 (a)	Principal Contractors are required to prepare and implement a Construction Environmental Management Plan (CEMP) relevant to the scale and nature of their scope of works. The CEMP shall comprise of a main CEMP document, issue specific Sub-plans, activity specific procedures and site-based control maps. The CEMP shall illustrate the relationship between other plans required by the contract, in particular those that relate to design management.	This Plan
3.3 (b)	Depending on the scope and scale of the works, TfNSW may decide to streamline the CEMP and Sub-plan requirements. For example, depending on the risk associated with particular environmental issues it may be appropriate to remove the need for a sub plan, or replace with a procedure as part of the CEMP.	Section 1.2 Refer to the Sydenham to Bankstown Staging Report
3.3 (c)	The CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the contract documentation and this Construction Environmental Management Framework.	Section 2 This Plan
3.3 (d)	As a minimum the CEMP will:	
(i)	Include a contract specific environmental policy;	Section 1.3 and Appendix D
(ii)	Include a description of activities to be undertaken during Construction;	Section 1.1
(iii)	For each plan under the CEMP include a matrix of the relevant Conditions of Approval or Consent referencing where each requirement is addressed;	Refer to relevant Sub-plan
(iv)	For each plan under the CEMP, set objectives and targets, and identify measurable key performance indicators in relation to these;	Section 1.4 and relevant Sub-plans
(v)	For each role that has environmental accountabilities or responsibilities, including key personnel, provide a tabulated description of the authority and roles of key personnel, lines of responsibility and communication, minimum skill level requirements and their interface with overall project organisation structure;	Section 3.3
(vi)	Assign the responsibility for the implementation of the CEMP to the Environment Manager, who will have appropriate experience. The Principal Contractor's Project Director will be accountable for the implementation of the CEMP;	Section 3.3
(vii)	Identify communication requirements, including liaison with stakeholders and the community;	Overarching Sydney Metro Community Communication Strategy

Clause	Requirement	Document Reference
(viii)	Include induction and training requirements and a summary of the Training Needs Analysis required in Section 3.9(b)	Section 3.5
(ix)	Management strategies for environmental compliance and review of the performance of environmental controls;	Sections 0, 3.16 and 3.17
(x)	Processes and methodologies for surveillance and monitoring, auditing and review, and reporting on environmental performance including environmental compliance tracking;	Section 3.9
(xi)	Include procedures for emergency and incident management, non-compliance management, and corrective and preventative action; and	Section 3.8 and 0
(xii)	Include procedures for the control of environmental records.	Section 3.15
3.3 (e)	The CEMP and associated Sub-plans will be reviewed by TfNSW and/or an independent environmental representative (see Section 3.11) prior to any Construction works commencing. Depending on the Conditions of Approval, the CEMP and certain Sub-plans may also require the approval of the Department of Planning and Environment (DPE).	Section 1.2
3.3 (f)	Where a corresponding systems document exists within the Sydney Metro Integrated Management System, the Principal Contractor's procedures will be required to be consistent with any requirements in those documents.	This plan and supporting documents have been written to meet the Sydney Metro project requirements.

Please refer to Appendix A for all other CoA, REMM and CEMF requirements relevant to the development of this Plan.

1. Introduction

Sydney Metro is Australia’s biggest public transport project. The network will deliver 31 metro stations and more than 65km of new metro rail. The Sydney Metro Network will provide opportunities to lead the transformation of Sydney’s urban environment and support transit orientated development connecting Sydney’s Central Business District to vibrant and attractive places across the Greater Sydney Region. The Sydney Metro Network will link Sydney’s three Metropolitan centres and introduce the necessary step change in rail infrastructure to ensure, the NSW Government’s aim of 30-minute cities as defined in Future Transport Strategy 2056.

The Sydney Metro Network has currently two core corridors, the Northwest Corridor and City and Southwest Corridor, with a further six corridors proposed as shown in Figure 1.

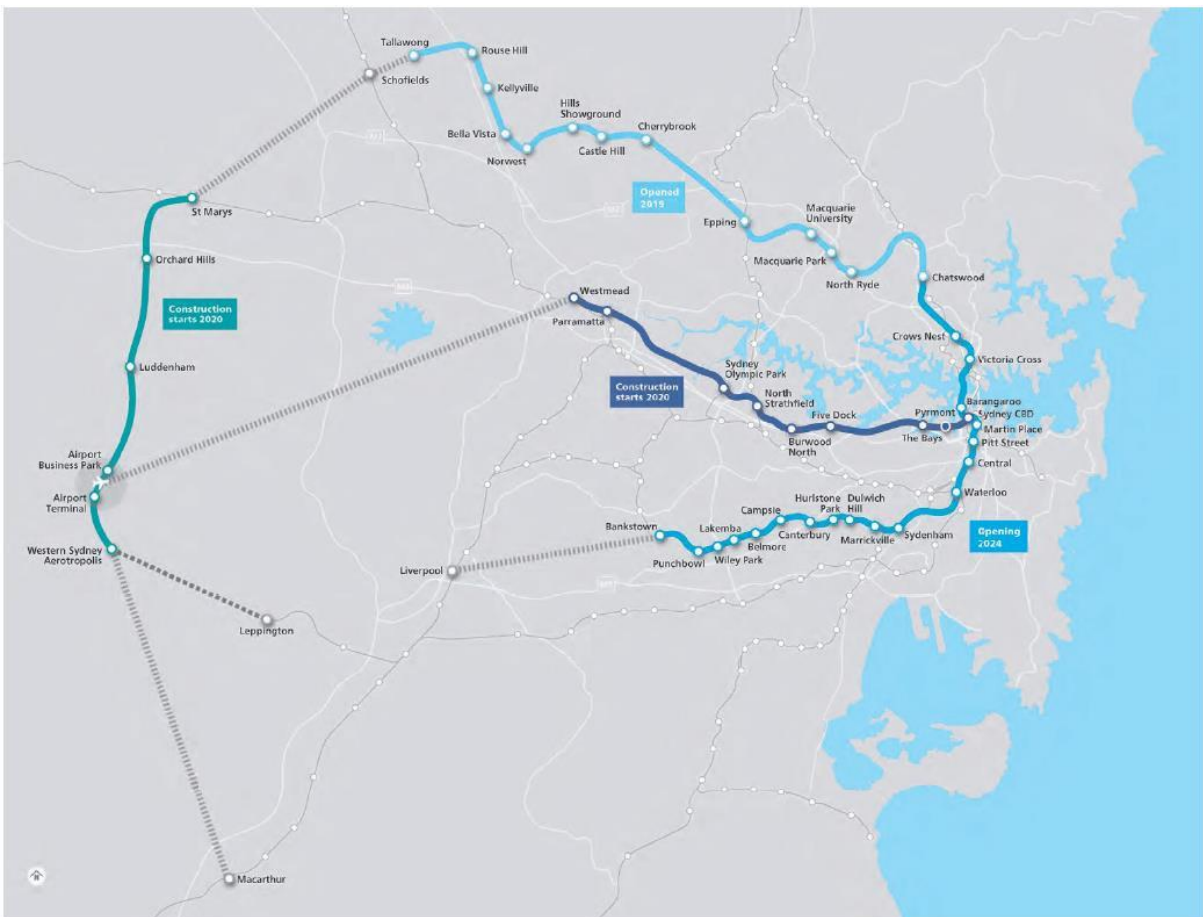


Figure 1 Sydney Metro route map

The Sydney Metro City & Southwest project includes a new 30km metro line extending metro rail from the end of the Metro North West Line at Chatswood, under Sydney Harbour, through new Central Business District stations and southwest to Bankstown. It is due to open in 2024 with the ultimate capacity to run a metro train every two minutes each way through the centre of Sydney.

Sydney Metro City & Southwest comprises two core components – the Chatswood to Sydenham project, and the Sydenham to Bankstown upgrade. This document refers to the Sydenham to Bankstown upgrade (herein referred to as the Southwest Metro (SWM) Project).

The SWM Project was declared to be State Significant Infrastructure (SSI) and Critical State Significant Infrastructure (CSSI) by a Ministerial order on 10 December 2015 under Section 5.12 (4) and 5.13 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (previously referred to as sections 115U(4) and 115V prior to amendment of the EP&A Act). An Environmental Impact Statement (EIS) (GHD/AECOM September 2017) was prepared and placed on public exhibition from 13 September 2017 to 8 November 2017. A Submissions and Preferred Infrastructure Report (SPIR) (GHD/AECOM June 2018) was prepared in response to the submissions received during the EIS exhibition period. The SPIR was placed on public exhibition from 20 June 2018 to 18 July 2018. A Submissions Report was then prepared by Sydney Metro (September 2018) in response to submissions received during the SPIR exhibition period. The project was approved by the Minister for Planning on 12 December 2018 (Planning Approval number SSI-8256).

A modification report for the SWM Project was prepared by Sydney Metro (May 2020) and placed on public exhibition from 21 May 2020 to 4 June 2020. A Submissions Report was prepared by Sydney Metro (September 2020) in response to the submissions received during the modification report exhibition period. The SWM Project Modification was determined by the Minister for Planning on 22 October 2020.

Downer EDI Works (Downer) has been appointed as the Principle Contractor for the station upgrades at Dulwich Hill, Campsie and Punchbowl for the Southwest Metro Project. The scope of works for these upgrades are outlined below.

1.1. Scope of works

This document refers to the Southwest Metro – Dulwich Hill, Campsie and Punchbowl Station Upgrades (the Project). Below is a description of the Construction scope for the Project:

Dulwich Hill Station

- Construction of new covered station concourse bridge from Bedford Crescent and Light Rail entry to Ewart Lane with connection to platforms;
- Refurbishment and reuse of overhead booking office;
- Refurbishment and reuse existing platform building;
- Provision of new safety rail to Wardell Road bridge adjacent to booking office;
- Construction of new landscaped public plaza incorporating lighting, seating and access to station entries;
- Construction of new platform building;
- Construction of new shared path linking Wardell Road and Ewart Lane;
- Construction of new stairs to Ewart Lane car park;
- Provision of accessible access to the pedestrian crossing at Wardell Road;
- Provision of new bicycle parking hoops;
- Construction of new service building and associated infrastructure;
- Platform works, including raising platform and provision of platform drainage. Installation of 1500mm deep tile zone, temporary tactiles and yellow safety line;

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- Platform works also includes provision for platform edge screens (PES), platform screen doors (PSD) and mechanical gap fillers (MGF) (to be installed by others);
- Provision of new pedestrian lighting between Bedford Crescent and Keith Lane;
- Provision of new shelter and seat for kiss and ride on Bedford Crescent;
- Landscaping to the south of the station;
- Dudley Street bus interchange area works;
- Provision of new vertical protection screens to both sides of existing Wardell Road bridge;
- Provision of 2 new lifts and associated infrastructure, landings and canopies to lift entries;
- Installation of new security and segregation fencing;
- Construction of new Combined Services Route (CSR); and
- Services relocations / enabling works.

Campsie Station

- Refurbishment and reuse of heritage platform buildings;
- Construction of secured bike locker;
- Construction of new canopy over the concourse;
- Platform works, including raising platform and provision of platform drainage. Installation of 1500mm deep tile zone, temporary tactiles and yellow safety line;
- Platform works also includes provision for PES, PSD and MGF (to be installed by others);
- Replace open fencing on Beamish Street and renew existing planters;
- Installation of 16 x bike racks off North Parade in existing car park;
- Construction of new services building and associated infrastructure;
- Replacement of planter beds to corners of Beamish Street;
- Construction of new kiss and ride on South Parade;
- Installation of new security and segregation fencing;
- Construction of new CSR; and
- Services relocations / enabling works.

Punchbowl Station

- Repurpose and refurbishment of station rooms in Platform buildings 1 and 2;
- Provision of three new lifts and associated infrastructure, landings and canopies to lift entries and platform;
- Installation of new canopy over existing stair at Northern entry;
- Installation of new roof above the concourse bridge, Southern entry and platform stairs.

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- Removal of hooped top fencing to station concourse overbridge and platform stairs and replaced with compliant glass screens and stair balustrades;
- Installation of new handrails;
- Removal of existing southern stairs, installation of new concrete slab at concourse level and new stairs further south;
- Platform works, including raising platform and provide platform drainage. Installation of 1500mm deep tile zone, temporary tactiles and yellow safety line. Provision of egress ramps off platform as required by fire life safety strategy;
- Platform works also includes provision for PES, PSD and MGF to be installed by others;
- Installation of new bike parking hoops off The Boulevarde and adjacent to the Northern entry;
- Installation of bollards to the edge of the carpark and extension to new paving to lift landing and edge of carpark;
- Landscaping to western end of Southern entry behind the retail properties;
- Mass planting to existing garden beds adjacent to Northern entry and replace timber logs;
- Upgrade to existing pedestrian pathway under Punchbowl Road, including handrail and fencing;
- Upgrade to existing lighting;
- Paint finish to wall and soffit and provision for CCTV;
- Landscaping and new lighting to Northern entry;
- Provision for pop-up retail in the park adjacent the Northern entry.
- Provision of kiss and ride on The Boulevarde;
- Construction of new service building, associated infrastructure and landscaping;
- Installation of new security fencing;
- Construction of retaining walls;
- Construction of new CSR; and
- Services relocations / enabling works.

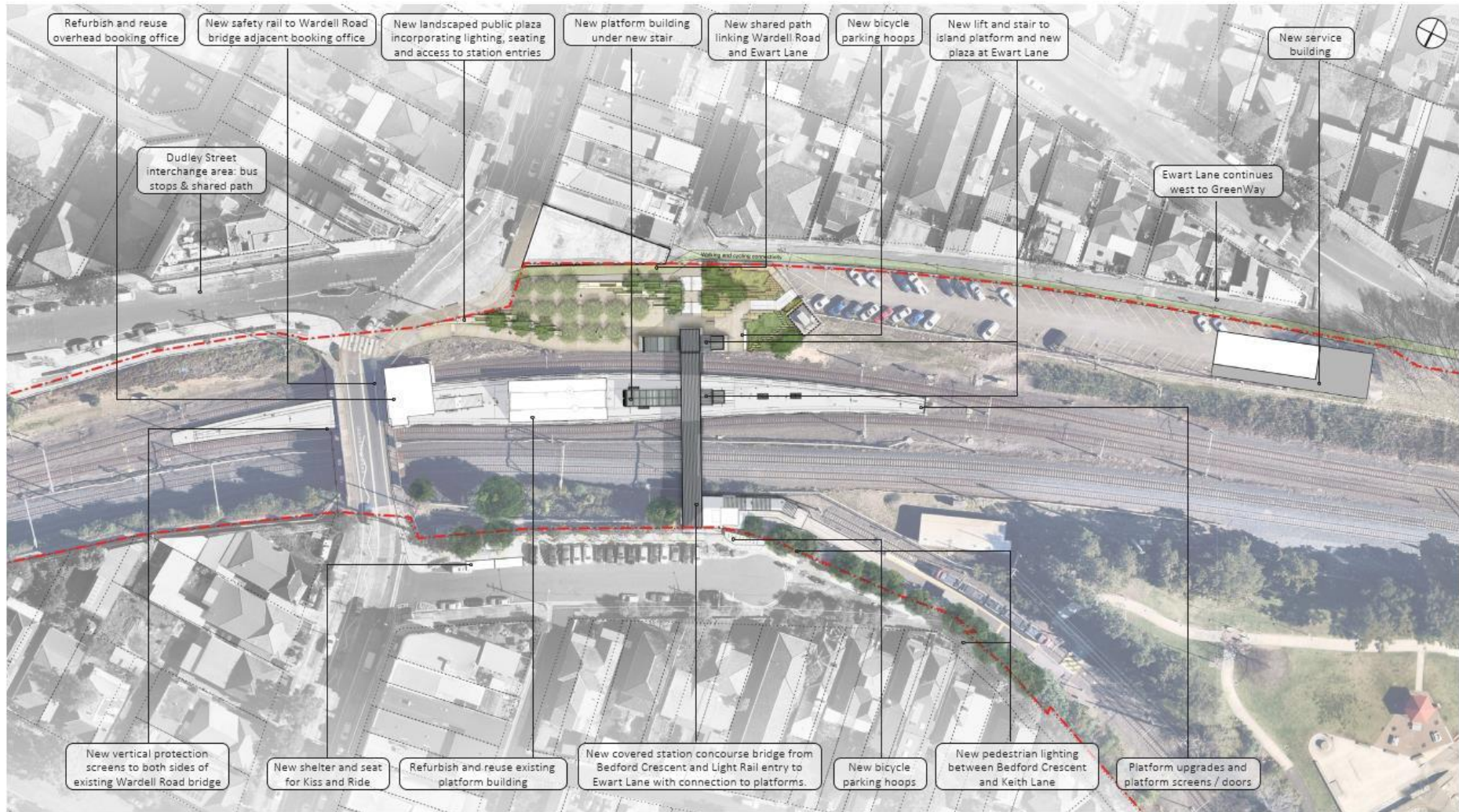


Figure 2 Sydney Metro Dulwich Hill Station upgrades

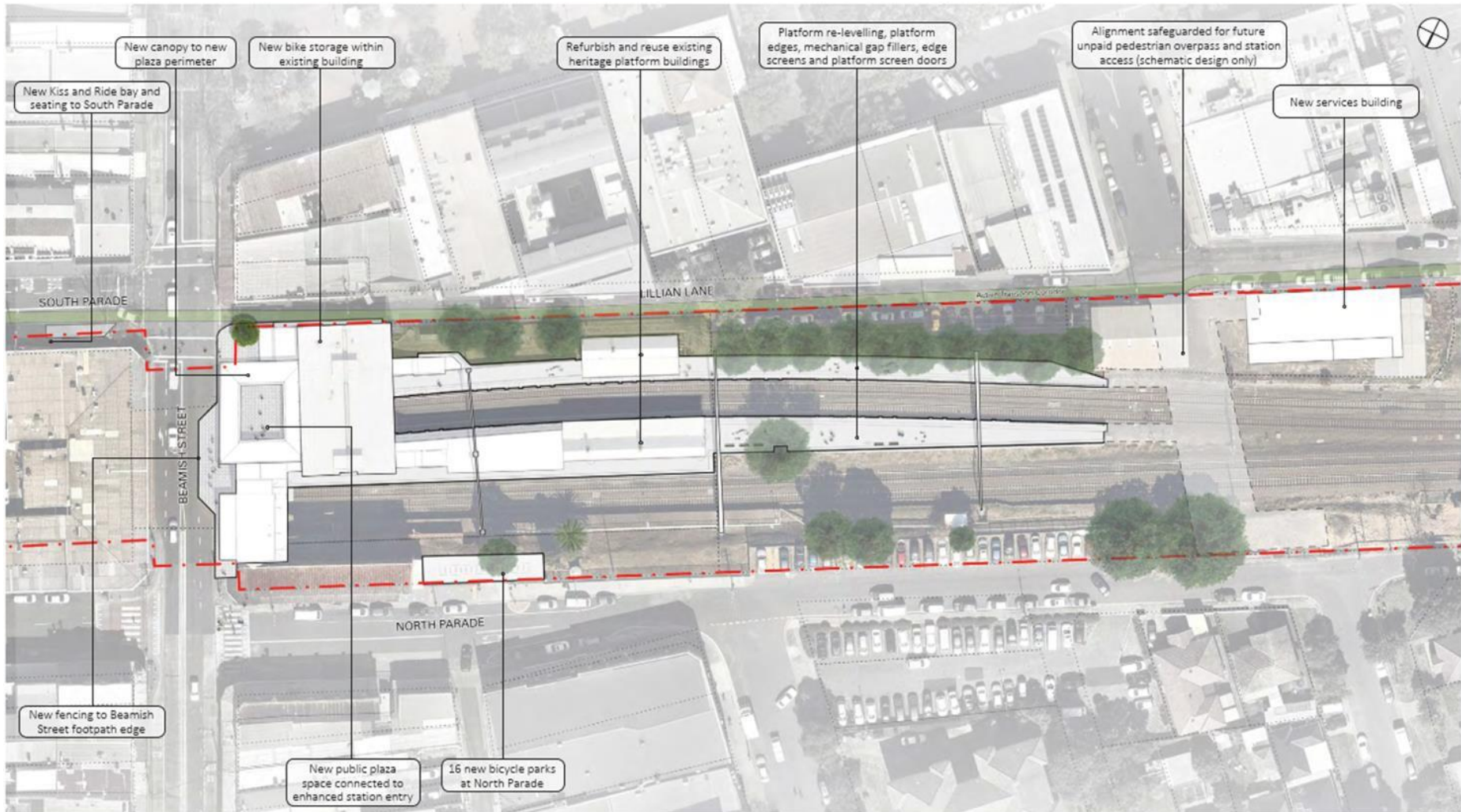


Figure 3 Sydney Metro Campsie Station upgrades

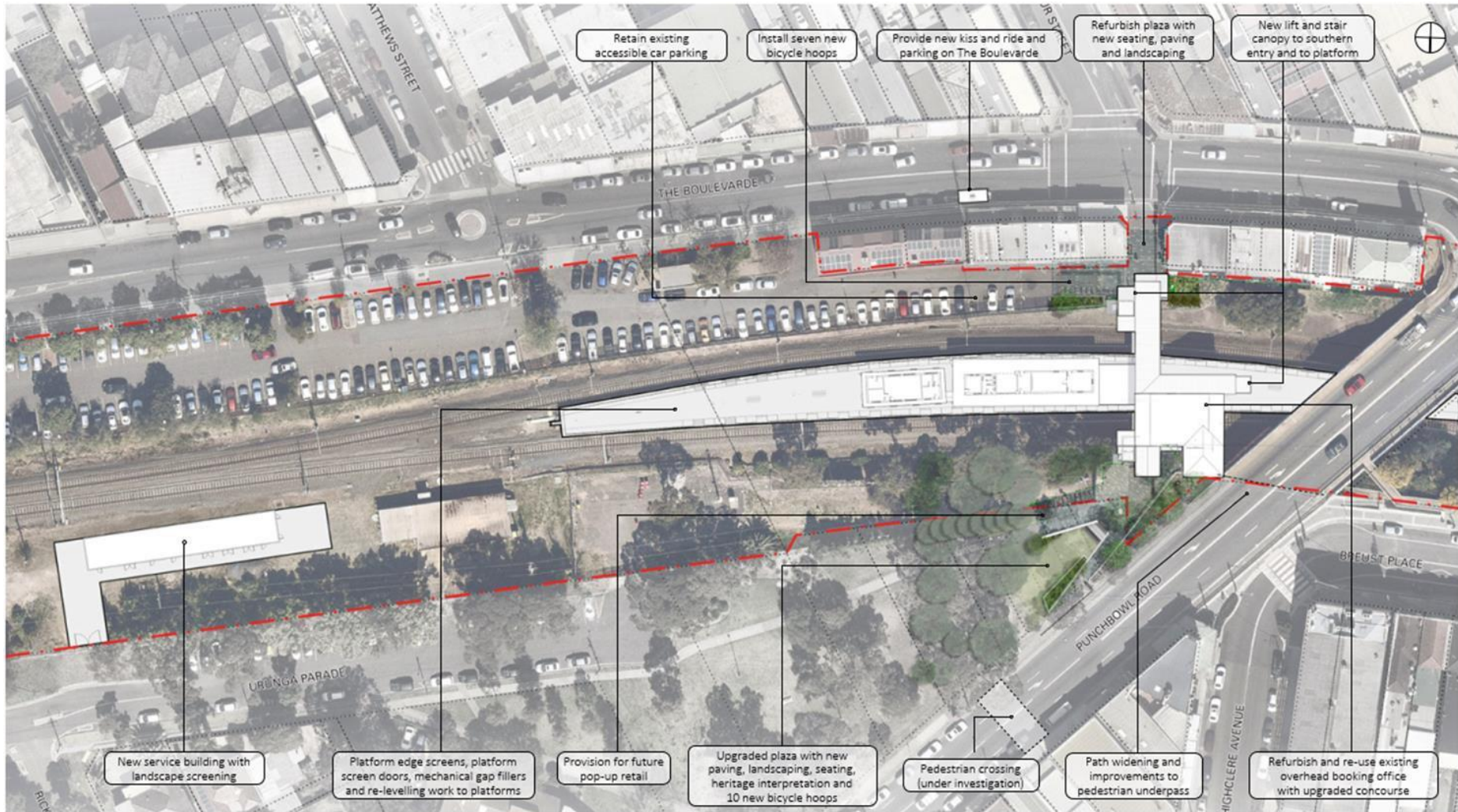


Figure 4 Sydney Metro Punchbowl Station upgrades

Temporary Construction facilities to facilitate Construction of the Project would be located at the locations outlined in Table 3. Refer to Figure 2.1 within Appendix B of the SPIR for indicative layouts of these facilities. Figure 2.4 within Appendix B of the SPIR also provides further detail of work site W7.

Table 3 Temporary Construction facilities

SPIR reference	Location	Existing use
C2	Ewart Lane, Dulwich Hill	Rail corridor, parking
W3	Bedford Crescent, Dulwich Hill	Rail corridor and Council car park
C7	North Parade/Wilfred Avenue, Campsie	Rail corridor, road reserve with parking
C8	Lilian Street, Campsie	Rail corridor, parking
C12	Bridge Road, Campsie	Sydney Trains Maintenance Facility
C18	Urunga Parade Punchbowl	Rail corridor
C19	Urunga Parade, Punchbowl	Rail corridor, road reserve
C20	The Boulevard, Punchbowl	Parking and corridor
C21	Breust Place, Punchbowl	Rail corridor

In accordance with CoA A16-A19 Downer has implemented additional Ancillary Facilities at Campsie and Dulwich Hill, as referenced in Table 3.1 below:

Table 3.1 Additional Ancillary Facilities

CoA pathway	Location	Existing use
A19 – Minor AF	Ewart Street Carpark, Dulwich Hill	Sydney Train car park (rail corridor)
A19 – Minor AF	Wilfred Avenue, Campsie	Sydney Train car park (rail corridor)

When establishing a construction facility, Downer will consider the requirements of the CEMF, CoA and REMM in developing the layout of the site. Including, but not limited to:

- The location of noise intensive works and 24-hour activities in relation to noisesensitive receivers;
- The location of site access and egress points in relation to noise and light sensitive receivers, especially for sites proposed to be utilised 24 hours per day;
- The use of site buildings to shield noisy activities from receivers;
- The use of noise barriers and / or acoustic sheds where feasible and reasonable for sites proposed to be regularly used outside of daytime hours;
- Aim to minimise the requirement for reversing, especially of heavy vehicles.

1.2. Purpose of this CEMP

This Construction Environmental Management Plan (CEMP) outlines how Downer will meet the environmental outcomes for the design and Construction of the Project. This will be achieved through the development and application of Downer contract-specific Environmental Management System (EMS) and this Plan. Sydney Metro is delivering the Project on behalf of the NSW Government.

In accordance with the Sydney Metro City & Southwest - Sydenham to Bankstown Staging Report, the Principal Contractor will implement the environmental management requirements of the CEMF in line with the DCP column in Table 5 of the Staging Report.

Figure 5 outlines the applicability of the CEMF to the Project (and is extracted from Table 5 of the Staging Report).

CEMF Environmental Management Category	DCP
Waste / Spoil / Recycling *	CEMP-P
Groundwater	CEMP
Traffic	CoA E47 CTMP
Noise & Vibration	CEMP sub-plan
Heritage	CEMP sub-plan
Flora & Fauna / Biodiversity	CEMP-P
Visual Amenity	CEMP sub-plan
Carbon & Energy	SMP
Materials	SMP sub-plan
Soil & Water	CEMP sub-plan
Air Quality	CEMP-P
Workforce Development	WFDIP Plan

CEMP-P: CEMP procedure

CTMP: Construction Traffic Management Plan (standalone document)

SMP: Sustainability Management Plan (standalone document)

WFDIP: Workforce Development and Industry Participation Plan (standalone document)

Figure 5 CEMF Applicability to the Project

The following CEMP sub plan, which was prepared separately to this document, will form part of the CEMP but was not required to be submitted to DPE:

- Visual Amenity Management Plan (as referred to under Section 3.4 of the CEMF).

The following stand-alone plan was also be prepared and submitted to DPE for information and to TfNSW for information following engagement with the Sydney Coordination Office (SCO) (as per CoA E47):

- Construction Traffic Management Plan (as referred to in CoA E47 and Section 3.4 of the CEMF).

The following plans are Sub-plans to the Sustainability Management Plan. Refer to the Sustainability Management Plan for further details.

- Carbon and Energy Management Plan; and
- Materials Management Plan.

Management of the following aspects during Construction have been incorporated into the CEMP as procedures (refer to Appendix E for CEMP procedures):

- Biodiversity;
- Groundwater;
- Air Quality; and
- Waste and Spoil.

The CEMP has been developed in accordance with the:

- Framework of AS/NZS ISO 14001:2015 EMS;
- Sydney Metro’s Construction Environmental Management Framework v3.2
- New South Wales Environmental Management Systems Guidelines (Edition 3)

Implementation of the CEMP will:

- Identify the environmental obligations and the hazards and risks associated with the works (indicative risks are included in Appendix C);
- Help prevent unauthorised environmental harm;
- Ensure the Principal Contractor complies with the Minister for Planning’s Project Planning Approval SSI-8256;
- Ensure the Principal Contractor obtains and complies with relevant licences and approvals, including an Environment Protection Licence (EPL) if required;
- Comply with all relevant environmental legislation;
- Minimise negative impacts on the community that relate to the environmental impacts of the works; and
- Identify and implement feasible opportunities to reduce the environmental impact of the works that are beyond contractual and compliance requirements.

In accordance with CoA C2 and C6 this CEMP was endorsed by the Environmental Representative (ER) before being submitted to the Planning Secretary of the DPE along with, or prior to, the submission of the Sub-plans no later than one (1) month before commencement of Construction.

In accordance with CoA C7, Construction did not commence until the CEMP and relevant Sub-plans listed in CoA C3 of the Project Planning Approval have been approved by the Planning Secretary of DPE. Minor amendments to the CEMP were approved by the ER for implementation for the duration of Construction in accordance with CoA C7.

For Downer this document defines the environmental management principles, processes, procedures, systems, tools, and templates implemented for use throughout the duration of the project. This document is subordinate to the Project Management Plan (PMP) which has been developed to:

- satisfy the requirements of the contract; and
- support the project team in completing the requirements of the project.

This document is subordinate to the Project Management Plan (PMP) and it has been developed to:

- i. Comply with the Conditions of Approval, conditions of any licenses, permits or other approvals issued by government authorities for the Project, all relevant legislation and regulations, and accepted best practice management;
- ii. Comply with Minister's (NSW Government, Department of Planning and Environment, Infrastructure Approval) Conditions of Approval (CoA) relating to Section 5.19 of the *Environmental Planning & Assessment Act 1979*, the Sydney Metro Sydenham to Bankstown Upgrade project State Significant Infrastructure 8256, 12 December 2018.
- iii. Comply with Exhibit A Scope of Works and Technical Criteria – Southwest Metro Station Upgrade Works Package 6 (main body) 1.0
- iv. Comply with Exhibit A Scope of Works and Technical Criteria – Appendix F03 Environment and Appendix F08 Sustainability.
- v. Comply with Annexure 1 and Annexure 2 to Exhibit A - Scope of Works and Technical Criteria – Appendix F03 Environment.
- vi. Comply with the relevant requirements of the NSW Government's *Guideline for Preparation of Environmental Management Plans* (Department of Infrastructure, Planning and Natural Resources, 2004).
- vii. Include the Downer Environmental Sustainability Policy 2019
- viii. Comply with Downers Environmental Management System as certified under ISO14001:2015 – certificate no. 47714001610020 (Appendix D)
- ix. Address all relevant obligations under TfNSW Sustainable Design Guidelines v.4.0 (SDG)
- x. Provides specific management measures to ensure that construction works have minimal environmental impact and risk, and where possible, enhanced environmental outcomes.
- xi. Support the project team in completing the requirements of the project.

1.2.1 Document Scope (Alignment to Downer ISO 14001:2015)

The scope of this document applies to Downer Transport Projects, specifically the Southwest Metro Station Upgrade Works Package 5 hereafter referred to as SMSP5.

This document applies to all aspects of environmental management for the project. Whilst this CEMP is in the template and format of the client as issued as part of the contract, Downer has conducted a consistency assessment with the Downer TDS template to ensure there is no departure from Downers EMS and DG-DM-TP028 Environmental Management Plan – Cat 4 and 5.

The target audiences for this document are all Downer workers, Dower sub-contractors and any other relevant stakeholders. The document has been produced in a first instance to comply with Downer's Environmental Management System as certified under ISO14001:2015 and looks to ensure the correct environmental controls, mitigation measures, auditing and assurances are upheld throughout the project. As a minimum, Downer's Environmental Management System implemented on this project looks to ensure:

- appointment of an environment lead or environment team, who is responsible for the EMS and for ensuring organisational commitment

- establishment / implementation of the environmental policy for the organisation
- identification of significant environmental aspects (activities) and impacts
- identification of relevant legislative and regulatory requirements
- identification of environmental priorities and establishment of environmental objectives and targets
- development and implementation of an environment management program (this includes assigning responsibilities for undertaking actions)
- establishment of a monitoring, review and reporting program to review effectiveness of the program, to report to management on implementation and to undertake any corrective action
- ensuring that the EMS is based on the premise of continued improvement.

1.2.2 Referenced Documents

IMS DOCUMENTS

USE FOR PROJECT? If
No, see project specific documents.

POLICIES

SM ES-ST-209	Sydney Metro Environment Sustainability Policy	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-ZH-PO200	Downer Environmental Sustainability Policy	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

PRINCIPLES

DG-ZH-PN002	10 Environmental Principles	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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STANDARDS

SM ES-ST-202	Environment Compliance Management Standard	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-HR-ST013	Training & Competency Management Standard	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-ZH-ST002	Legislative and Other Requirements Standard	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-ZH-ST013	Zero Harm Worker Consultation Standard	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

PROCEDURES

DG-DM-PR003	Operational Change Management Procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-QA-PR003	Internal Audits Procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-RM-PR003	Project Risk and Opportunity Management	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-ZH-PR006	Incident Management Procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-ZH-PR007	Zero Harm Performance Monitoring and Reporting Procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
DG-ZH-PR015	Emergency Management Procedure	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

DG-ZH-PR077.1	Sustainability Data Collection and Reporting Procedure	Yes	<input type="checkbox"/> No
DG-ZH-PR116.1	Inspections Procedure	Yes	<input type="checkbox"/> No
SM ES-PW-310	Out of Hours Works Assessment Procedure	Yes	<input type="checkbox"/> No
SM ES-PW-303	Environmental Incident Classification and Reporting Procedure	Yes	<input type="checkbox"/> No
SM ES-PW-309	Water Discharge and Reuse Procedure	Yes	<input type="checkbox"/> No
SM ES-PW-314	Planning Approval Consistency Procedure	Yes	<input type="checkbox"/> No
SM PS-PW-330	Crisis Management Implementation Plan	Yes	<input type="checkbox"/> No
SM-18-00105232	Sydney Metro City & Southwest TfNSW Unexpected Finds Procedure v1.4	Yes	<input type="checkbox"/> No

FORMS

SM ES-FT-421	Sydney Metro City & Southwest Environmental Reporting Template	Yes	<input type="checkbox"/> No
SME ES-FT-439	Sydney Metro City & Southwest Sustainability Reporting Template	Yes	<input type="checkbox"/> No
SM ES-FT-403	Environmental Incident and Non-Compliance Report Form	Yes	<input type="checkbox"/> No
SM ES-FT-406	Environmental Inspection Information & Summary	Yes	<input type="checkbox"/> No

REGISTERS

DA-QA-RG001	Downer Group Definitions Register	Yes
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OTHER

SS 2017–24	Sydney Metro City & Southwest Sustainability Strategy	<input checked="" type="checkbox"/> Yes
SM ES-ST-210	City and Southwest Construction Noise and Vibration Strategy	<input checked="" type="checkbox"/> Yes
CERT	TfNSW Carbon Estimation and Reporting Tool	<input checked="" type="checkbox"/> Yes
SM ES- ST-214	Principal's General Specifications G10 - Traffic and Transport Management	<input checked="" type="checkbox"/> Yes

PROJECT SPECIFIC DOCUMENTS

DG-ZH-FM116.2	Environmental Inspection Checklist
PCMWA 001	Package 5 and Package 6 –Pre-Construction Site Establishment
PCMWA 002	Package 5 and Package 6 –WE38 Possession and Minor, Standard Hours Works
This Document	Construction Environment Management Plan
Within CEMP Annex E	Flora and Fauna Management Plan (Biodiversity)
Within CEMP Annex E	Groundwater Management Plan
Within CEMP Annex E	Air Quality Management Plan
Within CEMP Annex E	Waste and Spoil Management

SWM-DCP-SWMP-001	Soil and Water Management Plan
SWM-DCP-HMP-001	Heritage Management Plan
SWM-DCP-NVMP-001	Noise and Vibration Management Plan
SMCSWSW5-DEW-WEC-SU-PLN-000043	Sustainability Management Plan
SMCSWSW5-DEW-WEC-WR-PLN-000034	Workplace Relations Management Plan
SMCSWSW5-DEW-WEC-WD-PLN-000040	Workforce Development and Industry Participation Plan
SMCSWSW5-DEW-WEC-HS-PLN-000038	Project Health and Safety Management Plan
TBA	Construction Traffic Management Plan
SMCSWSW5-DEW-WEC-SU-PLN-000043	Carbon and Energy Management Sub-Plan (Annex 1 of the Sustainability Management Plan)
SMCSWSW5-DEW-WEC-SU-PLN-000043	Materials Management Sub-Plan (Annex 2 of the Sustainability Management Plan)
SMCSWSW5-DEW-WEC-PM-PLN-000024	Project Management Plan
SMCSWSW5-DEW-WEC-PM-PLN-000025	Technical Management Plan
SMCSWSW5-DEW-WEC-PM-PLN-000026	Risk Management Plan
SMCSW SW5-DEW-WEC-PM-PLN-000027	Testing and Commissioning Plan
SMCSWSW5-DEW-WEC-QM-PLN-000056	Quality Plan
SMCSWSW5-DEW-WEC-CM-PLN-000055	Construction and Site Management Plan
SMCSWSW5-DEW-WEC-CL-PLN-000028	Community Liaison Management Plan
TBA	Advertising Provisioning Plan
SMCSWSW5-DEW-WEC-WR-PLN-000034	Obsolescence Management Plan
SMCSWSW5-DEW-WEC-PR-PLN-000117	Procurement Plan
SWM5-CM-PLN-00016	Cost Management Plan
SWM5-PM-PLN-0017	Systems Integration Plan
SMCSWSW5-DEW-WEC-CM-PLN-000101	Demolition Management Plan
SMCSWSW5-DEW-WEC-HS-PLN-000037	COVID-19 Management Plan

1.3. Environment and sustainability policy statement

Sydney Metro’s Environment and Sustainability Policy is included in Appendix D. The policy reflects a commitment in the delivery of the project to:

- Align with, and support, Transport for NSW (TfNSW) Environment & Sustainability Policy;
- Optimise sustainability outcomes, transport service quality, and cost effectiveness;
- Develop effective and appropriate responses to the challenges of climate change, carbon management, resource and waste management, land use integration, customer and community expectation, and heritage and biodiversity conservation;
- Be environmentally responsible, by avoiding pollution, enhancing the natural environment and reducing the project ecological footprint, while complying with all applicable environmental laws, regulations and statutory obligations; and
- Be socially responsible by delivering a workforce legacy which benefits individuals, communities, the project and industry, and is achieved through collaboration and partnerships.

The Principal Contractor engaged for the Sydney Metro Package 5 (Dulwich Hill, Campsie and Punchbowl) Project is Downer and, this CEMP has been revised to contain and reflect Downer’s contract specific environmental policy, in accordance with Section 3.3(d)(i) of the CEMF.

Downer’s Environmental Sustainability Policy (DG-ZH-PO200) (which is contained within Appendix D) reflects the following commitments in the delivery of project:

- minimise the short and long-term impact of our activities on the environment and local communities through responsible environmentally sustainable management within design, planning, delivery, construction, manufacturing and operation
- promote a positive culture through implementing initiatives that foster sustainable innovation;
- optimise our products and services to relentlessly improve our environmental sustainability performance and improve the sustainable use of natural resources.
- comply with relevant environmental legislation, appropriate industry guidelines and standards, Sydney Metro’s and regulatory agency requirements
- implement responsible resilient work practices that minimise the impact on local communities
- implement and maintain an environmental management system consistent with international standard AS/NZS ISO 14001 which integrates requirements throughout the overarching operational systems
- establish, monitor and review environmental sustainability objectives and targets and identify opportunities to improve our environmental sustainability
- evaluate the performance, effectiveness and compliance of our environmental management systems through regular audits and reviews
- implement effective controls to identify, evaluate, eliminate or reduce adverse environmental risks from our work activities
- take all practical steps to prevent pollution and protect biodiversity and ecosystems

- drive innovation to identify sustainable supply chains; reduce and manage energy, waste, and water consumption; reduce and manage air emissions effluents; and climate change mitigation and adaptation
- procure goods and services to minimise environmental risk and maximise sustainable opportunities and benefits for the total life cycle
- regularly report our environmental sustainability performance and consult with stakeholders
- provide education, training and encouragement to our workforce, and business partners to understand their responsibilities for the implementation of environmental sustainability principles and practices; and
- display this policy, making it publicly available and sharing it with interested parties.

1.3.1. Sydney Metro Environment and Sustainability Statement of Commitment

The Sydney Metro Environment and Sustainability Statement of Commitment is included in Appendix D and has six guiding principles which reflect the key sustainability principles for the project, namely to:

- demonstrate leadership – deliver a world class metro that is environmentally and socially conscious, share’s knowledge and demonstrate innovation in sustainability
- tackle climate change – integrate a comprehensive climate change response, and drive excellence in low carbon solutions
- manage resources efficiently – achieve whole-of-life value through efficient use and management of resources
- drive supply chain best practice – collaborate with key stakeholders to drive a lasting legacy in workforce development, industry participation and sustainable procurement
- value community and customers – respond to community and customer needs, promote heritage, liveable places and wellbeing for current and future generations
- respect the environment – minimise impacts and take opportunities to provide environmental improvements.

1.4. Objectives and targets

The key objective of this Plan is to set in place a management approach for the Project which addresses all relevant environmental and planning requirements. Key environmental performance outcomes, commitments and mitigation measures for the Project have been sourced from the project’s EIS and the CEMF and are summarised in Table 4.

Additional environmental targets for the works are:

- Compliance with the Minister for Planning’s Project Planning Approval SSI-8256;
- Compliance with all permits and licences; and

- Continual improvement through collaboration with Sydney Metro, regulatory agencies and other key stakeholders.

In consideration of DG-ZH-PO200 Environmental Sustainability Policy, Sydney Metro's contractual requirements, and any identified hazards and/ or risks for the project, Downer has developed a set of objectives and targets that are applicable to this project, as per the following table. These objectives and targets are managed to ensure that all identified, as well as potential environmental impacts that could reasonably be expected to occur during the works, fall within acceptable and agreed limits. This is achieved through pro-active environmental management planning prior to carrying out particular elements of work. In addition to this Downer has set its own Objectives and Targets to ensure compliance with the Downer Environmental Management System.

SMSP5 Project specific requirements are listed below in Table 4.

Table 4 Project Specific Objectives and targets

Objective	Target	Management measure
<p>Biodiversity</p> <p>The project design considers all feasible measures to avoid and minimise impacts on terrestrial and aquatic biodiversity. Offsets and/or supplementary measures are assured which are equivalent to any remaining impacts of project Construction and operation.</p>	<p>The project is designed to minimise impacts on biodiversity. Where practicable, the design minimises the need to clear vegetation.</p> <p>Potential impacts on biodiversity are managed in accordance with relevant legislation, including the EP&A Act, <i>Biodiversity Conservation Act 2016</i> (BC Act) and <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act). The biodiversity outcome is consistent with the Framework for Biodiversity Assessment (OEH, 2014a).</p>	<p>Compliance Monitoring and Reporting Program</p>
<p>Flooding and hydrology</p> <p>The project minimises adverse impacts on existing flooding characteristics. Construction and operation of the project avoids or minimises the risk of, and adverse impacts from, infrastructure flooding, flooding hazards, or dam failure. Long term impacts on surface water and groundwater hydrology (including drawdown, flow rates and volumes) are minimised. The environmental values of nearby, connected and affected water sources, groundwater and dependent ecological systems including estuarine and marine water (if applicable) are maintained (where values are achieved) or improved and maintained (where values are not achieved). Sustainable use of water resources.</p>	<p>Construction is undertaken in a manner that minimises the potential for adverse flooding impacts, through staging of works and the implementation of mitigation measures.</p> <p>Construction compounds and work sites are laid out such that flows are not significantly impeded.</p> <p>The project maintains or reduces flood levels within and adjacent to the rail corridor.</p> <p>The project avoids long term impacts to surface water.</p> <p>Opportunities to reuse water resources are considered during the design process.</p> <p>The use of water during Construction is minimised.</p>	<p>Management of soil and surface water will be undertaken throughout the delivery of the Project in accordance with the SWMP.</p>
<p>Heritage</p> <p>The design, Construction and operation of the project facilitates, to the greatest extent possible, the long-term protection, conservation and management of the heritage significance of items of environmental heritage and Aboriginal objects and places. The design, Construction and operation of the project avoids or minimises impacts, to the greatest extent possible, on the heritage significance of environmental heritage and Aboriginal objects and places.</p>	<p>The design is sympathetic to the historic significance of existing stations and the heritage significance of surrounding listed heritage items, and where practicable, avoids and minimises impacts to heritage.</p> <p>The design and mitigation strategies are reviewed by the Sydney Metro Design Review Panel.</p> <p>Impacts on heritage are managed in accordance with relevant legislation, including the EP&A Act, the Heritage Act 1977, and relevant guidelines. The potential impacts identified are mitigated by the mitigation measures provided.</p>	<p>Management of heritage will be undertaken throughout delivery of the project in accordance with the HMP.</p>
<p>Noise and vibration – amenity</p> <p>Construction noise and vibration (including airborne noise, groundborne noise and</p>	<p>The project will minimise impacts to the local community by:</p>	<p>Management of noise and vibration impacts will be undertaken</p>

Objective	Target	Management measure
<p>blasting) are effectively managed to minimise adverse impacts on acoustic amenity.</p> <p>Increases in noise emissions and vibration affecting nearby properties and other sensitive receivers during operation of the project are effectively managed to protect the amenity and well-being of the community.</p>	<p>controlling noise and vibration at the source</p> <p>controlling noise and vibration on the source to receiver transmission path</p> <p>controlling noise and vibration at the receiver</p> <p>implementing practicable and reasonable measures to minimise the noise and vibration impacts of Construction activities on local sensitive receivers.</p>	<p>throughout delivery of the project in accordance with the NVMP.</p>
<p>Noise and vibration – structural</p> <p>Construction noise and vibration (including airborne noise, groundborne noise and blasting) are effectively managed to minimise adverse impacts on the structural integrity of buildings, items including Aboriginal places and environmental heritage, and nearby road infrastructure.</p> <p>Increases in noise emissions and vibration affecting environmental heritage as defined in the Heritage Act 1977 during operation of the project are effectively managed.</p>	<p>The project minimises impacts to structures by:</p> <p>controlling vibration at the source</p> <p>controlling vibration on the source to receiver transmission path</p> <p>implementing practicable and reasonable measures to minimise vibration impacts of Construction activities on structures.</p>	<p>Management of noise and vibration impacts will be undertaken throughout delivery of the project in accordance with the NVMP.</p>
<p>Socioeconomic, land use and property</p> <p>The project minimises adverse social and economic impacts and capitalises on opportunities potentially available to affected communities.</p> <p>The project minimises impacts to property and business and achieves appropriate integration with adjoining land uses, including maintenance of appropriate access to properties and community facilities, and minimisation of displacement of existing land use activities, dwellings and infrastructure.</p>	<p>The project minimises impacts to the local community, community infrastructure, and businesses.</p> <p>Impacts to existing land use and properties are minimised.</p> <p>The project is appropriately integrated with adjoining land uses, and access to private properties is maintained.</p>	<p>Management will be undertaken in accordance with the REMMs and CoA's.</p>
<p>Soils</p> <p>The environmental values of land, including soils, subsoils and landforms, are protected.</p> <p>Risks arising from the disturbance and excavation of land and disposal of soil are minimised, including disturbance to acid sulfate soils and site contamination.</p>	<p>Site-specific soil characteristics are taken into consideration during detailed design and Construction.</p> <p>Any contamination is managed in accordance with relevant regulatory requirements.</p> <p>Any soil waste is assessed, classified, managed and disposed of in accordance with the Waste Classification Guidelines (EPA, 2014).</p>	<p>Management of soil and surface water will be undertaken throughout the delivery of the Project in accordance with the SWMP.</p>
<p>Sustainability</p> <p>The project reduces the NSW Government's operating costs and ensures the effective and efficient use of resources.</p> <p>Conservation of natural resources is maximised.</p>	<p>Sustainability considerations are integrated throughout design, Construction, and operation.</p> <p>The project would be carried out in accordance with the Sydney Metro City & Southwest Sustainability Policy.</p>	<p>Refer to Sydney Metro Sustainability Management Plan and Principal Contractor's Sustainability Management Plan.</p>
<p>Traffic, transport and access</p>	<p>Impacts to traffic and transport are minimised.</p>	<p>Management will be undertaken in</p>

Objective	Target	Management measure
<p>Network connectivity, safety and efficiency of the transport system in the vicinity of the project are managed to minimise impacts.</p> <p>The safety of transport system customers is maintained.</p> <p>Impacts on network capacity and the level of service are effectively managed.</p> <p>Works are compatible with existing infrastructure and future transport corridors.</p>	<p>Motorist, pedestrian and cyclist safety will be maintained or improved.</p> <p>Safe access to properties is maintained.</p>	<p>accordance with the CTMP, REMMs and CoA's.</p>
<p>Place making and urban design</p> <p>The project capitalises on opportunities to improve place, character and quality of the surrounding build and natural environment (including adjoining public spaces).</p> <p>The project contributes to the accessibility and connectivity of communities.</p>	<p>The project is designed to have regard to the surrounding landscape and visual environment and to minimise the potential for visual impacts.</p> <p>The project is visually integrated with its surroundings.</p> <p>The stations provide a sense of place and contribute positively to the surrounding urban environment.</p> <p>The design considers future planning for the Sydenham to Bankstown Corridor Urban Renewal Strategy.</p> <p>Vegetation providing screening to the rail corridor is retained where practicable.</p>	<p>Management will be undertaken in accordance with the REMMs and CoA's.</p>
<p>Water – quality</p> <p>The project is designed, constructed and operated to protect the NSW Water Quality Objectives where they are currently being achieved, and contribute towards achievement of the Water Quality Objectives over time where they are currently not being achieved, including downstream of the project to the extent of the project impact including estuarine and marine waters (if applicable).</p>	<p>Impacts to water quality during Construction and operation are minimised.</p> <p>Erosion and sediment controls during Construction are implemented in accordance with Managing Urban Stormwater: Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater: Soils and Construction Volume 2 (Department of Environment and Climate Change, 2008a).</p> <p>The project would protect or contribute to achieving the Water Quality Objectives, during Construction and operation.</p> <p>Construction water quality discharge would comply with the requirements of the Water Quality Monitoring Program.</p>	<p>Management of soil and surface water will be undertaken throughout the delivery of the Project in accordance with the SWMP.</p>
<p>Utilities</p> <p>The project is designed, constructed and operated to minimise impacts to utilities and provision of such to the public.</p>	<p>Impacts to utilities during Construction are minimised. The design considers the input of utility providers and owners.</p>	<p>Management will be undertaken in accordance with the REMMs and CoA's as well as the Utilities Management Strategy.</p>

The Downer Standard Objectives and Targets are listed below in Table 5.

Table 5: Downer's Objectives and Targets

Focus Area	Objective	Target
Legal Compliance	<ul style="list-style-type: none"> Compliance with all legal requirements. Undertake the project in accordance with environmental approvals. 	No regulatory infringements, including PINS and prosecutions. 100% compliance with statutory approvals.
Monitoring	Complete internal environmental audits in accordance with the pre-planned audit schedule.	Complete 100% of scheduled environmental audits.
Reporting	Promote a positive reporting culture. Ensure all environmental observations, hazards and near misses and incidents are entered into INX . Ensure actions are closed out by the nominated due dates.	0 actions arising from incident overdue >30 days.
Planning	Ensure that Downer workers are provided with regular and up-to-date information on environmental aspects for the duration of the project.	Review the content of the Environmental Management Plan prior to 25% of the scheduled project duration to maintain the currency of information provided to Downer workers and others.
Risk Management	Ensure that Downer workers are familiar with hazards and risks associated with the execution of the scope of work (work under contract).	The Project Risk & Opportunity Register, controls, and treatment plans are regularly reviewed and communicated to the project team in accordance with DG-RM-PR003 Project Risk and Opportunity Management.
Consultation	Ensure that Downer workers are regularly consulted on matters that affect the environment.	Conduct pre-start meetings (daily), and toolbox meetings (monthly).
Training	Ensure Downer workers are provided with training to enable work practices to be undertaken that are safe and minimise risk to the environment.	All Downer workers undertake, as a minimum, the two levels of induction training, i.e. project specific induction and Downer site specific induction.

2. Legal and approval requirements

2.1. Environmental planning approval process background

As discussed in Section 1, in September 2017 an EIS for the SWM Project was placed on public exhibition for a period of 56 days (eight weeks). A SPIR for the SWM Project was prepared and placed on public exhibition in June 2018 for a period of 28 days (four weeks). A Submissions Report for the SWM project was prepared and publicly released in September 2018. The SWM Project was approved on 12 December 2018 (SSI 8256). A Project Modification was prepared in May 2020 and the Project Modification MOD-1 was approved on 22 October 2020.

Under Section 5.23 of the EP&A Act the following authorisations are not required for approved State Significant Infrastructure (SSI) (and accordingly the provisions of any Act that prohibit an activity without such an authority do not apply):

- A permit under section 201, 205 or 219 of the *Fisheries Management Act 1994*;
- An approval under Part 4, or an excavation permit under section 139, of the *Heritage Act 1977*;
- An Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1974*;
- A bush fire safety authority under section 100B of the *Rural Fires Act 1997*; and
- A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the *Water Management Act 2000*.

In addition, Division 8 of Part 6 of the *Heritage Act 1977* does not apply to prevent or interfere with the carrying out of approved SSI and the following directions, orders or notices cannot be made or given so as to prevent or interfere with the carrying out of approved critical SSI:

- An interim protection order (within the meaning of the *National Parks and Wildlife Act 1974*);
- An order under Division 1 (Stop work orders) of Part 6A of the *National Parks and Wildlife Act 1974*, or Division 7 (Stop work orders) of Part 7A of the *Fisheries Management Act 1994*;
- A remediation direction under Division 3 (Remediation directions) of Part 6A of the *National Parks and Wildlife Act 1974*;
- an order or direction under Part 11 (Regulatory compliance mechanisms) of the *Biodiversity Conservation Act 2016*;
- An environment protection notice under Chapter 4 of the *Protection of the Environment Operations Act 1997*; and
- An order under section 124 of the *Local Government Act 1993*.

The abovementioned potential aspects and impacts are deemed to be addressed under the Project Planning Approval.

2.2. Approval and licencing requirements

Downer is aware of the importance of complying with all applicable environmental measures, and where practicable, exceeds the minimum legislative and regulatory requirements.

Downer’s obligations include conditions of regulatory approvals as well as the generally applicable Environmental Acts and their subsidiary legislation. Downer and the project team monitor changes to environmental legislation through monthly updates on environmental law changes provided by EnviroLaw, and ensure compliance is maintained throughout the project’s lifecycle.

The key legislative and approval requirements for the works are outlined in Table 6. Further detail is provided in Appendix B.

Table 6 Approval / licence requirements

Regulatory authority	Approval / licence required for this Project
Department of Planning and Environment(DPE)	Project Planning Approval granted under Division 5.2 of the <i>EP&A Act</i> (no. SSI-8256) Approval of reports, studies and plans as required by the Project Planning Approval.
Commonwealth Department of Environment	The <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) prescribes the Commonwealth’s role in environmental assessment, biodiversity conservation and the management of protected areas. Under the EPBC Act, matters of national environmental significance include world and national heritage properties and listed biodiversity impacts. The EIS concludes that the Project would not have a significant impact in relation to these matters. As such the Project is not a Controlled Action and does not require assessment and approval under the EPBC Act.
TfNSW and other road authorities	In accordance with the <i>Roads Act 1993</i> , the Principal Contractor will obtain the consent of the appropriate roads authority to erect a structure, carry out work in, on or over a public road, or dig up or disturb the surface of a public road. If the applicant is a public authority, the roads authority must consult with the applicant before deciding whether or not to grant consent or concurrence. As required, road occupancy permits will be sought in accordance with the Construction Traffic Management Plans.
Sydney Water	In accordance with the <i>Sydney Water Act 1994</i> , the Principal Contractor will obtain prior approval to connect to the sewer or discharging to sewer if required under a Trade Waste Agreement.

2.3. Relevant legislation

Legislation and other requirements relevant to the Project are outlined in Appendix B.

2.4. Additional environmental assessment

Changes to the project may require an assessment to determine consistency with the Project Approval and Environmental Documents. This assessment would be carried out in accordance with the Sydney Metro Planning Approval Consistency Assessment Procedure (SM ES-PW314).

The assessment will include:

- A description of the existing surrounding environment;
- Details of the ancillary works and Construction activities required to be carried out including the hours of works;

- An assessment of the environmental impacts of the works, including, but not necessarily limited to traffic, noise and vibration, air quality, soil and water, ecology and heritage;
- Details of mitigation measures and monitoring specific to the works that would be implemented to minimise environmental impacts; and
- Identification of the timing for completion of the Construction works, and how the sites would be reinstated (including any necessary rehabilitation).

Consistency Assessments would require approval from the Sydney Metro Director of Environment, Sustainability and Planning. Consistency Assessments would be made available on the Principal Contractor’s website and provided to the ER for information.

2.5. Standards and codes

The project will be constructed in accordance with relevant standards and codes in accordance with CoA A8 (i.e. in the form they are in at date of the approval).

Access to the latest Australian standards is available through iGATE. The environmental publications, standards, codes of practice and guidelines included in Table 7 are relevant to the Project and are referenced throughout this Plan. Other aspect specific guidelines are discussed in the relevant CEMP Sub-plans and other project management plans.

Table 7 Applicable standards and codes

Standard / Guideline	Relevant authority
ISO 14001 Environmental Management Systems – Requirements with Guidelines for use	International Organisation for Standardization
AS/ NZS 1940: 2017 – The Storage and Handling of Flammable and Combustible Liquids	Standards Australia
AS4282:1997 Control of the Obtrusive Effect of Outdoor Lighting	Standards Australia
AS 4326 The Storage and Handling of Oxidising Agents	Standards Australia
AS 3780 The Storage and Handling of Corrosive Substances (similar standards exist for other classes of dangerous goods).	Standards Australia
AS 2436 Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites	Standards Australia
AS/NZS 3833 The Storage and Handling of Mixed Classes of Dangerous Goods, in Packages and Intermediate Bulk Containers	Standards Australia
BS 7385-2 Evaluation and Measurement for Vibration in Buildings. Guide to Damage Levels from Groundborne Vibration	British Standards
IECA 2008 Best Practice Erosion and Sediment Control	IECA
ANZECC 1992 Australian Water Quality Guidelines for Fresh and Marine Waters	ANZECC
Australian Dangerous Goods Code	National Transport Commission
Environment Protection Manual for Authorised Officers: Bunding and Spill Management technical bulletin (EPA, 1997)	NSW EPA

Interim Construction Noise Guidelines (Department of Environment and Climate Change, 2009)	NSW EPA
ISO 14001 Environmental Management Systems – Requirements with Guidelines for use	International Organisation for Standardization
Managing Urban Stormwater: Soil and Construction (Landcom, 2008)	Landcom
Waste Classification Guidelines (Department of Environment, Climate Change and Water, 2008)	NSW EPA

2.6. Environment Protection Licence

At this stage, Sydney Metro’s Principal Contractor has not sought an Environment Protection Licence (EPL) from NSW EPA.

If Downer applies for an EPL for the Project, then this CEMP will be updated to incorporate the EPL’s requirements.

3. Environmental management plan

3.1. Preparation and availability of the CEMP

3.1.1. Preparation

Consistent with the requirements of CoA C1, this CEMP has been prepared in accordance with the approval documents and the Sydney Metro Construction Environmental Management Framework (CEMF).

The CEMP incorporates all relevant requirements of the EIS documentation, CoA, SPIR, Submissions Report, Modification Report as well as all relevant licences, permits and approvals for the Project including Sydney Metro's Environment and Sustainability Policy. The Sydney Metro and Downer Environment and Sustainability Policy have been attached to this CEMP (Appendix D).

For further detail regarding CEMP preparation refer to Section 1.2 of this CEMP. The CEMP was submitted to the Planning Secretary prior to commencement of Construction as outlined in CoA C2.

3.1.2. Availability

This CEMP will be available to all personnel and subcontractors via Downer's Project document control management system. It is the responsibility of Downer to ensure all personnel and subcontractors have access to the Project's CEMP. An electronic version of the CEMP will be made available on the project website, in accordance with CoA B14. The project website can be at: <https://www.downergroup.com/sydney-metro-environmental-documents>.

Subject to confidentiality, all documents subject to CoA B14, including this CEMP will be made publicly available. In accordance with CoA B14, copies of the following documents will be published prior to works commencing and maintained on the Project website:

- a) Information on the current implementation status of the CSSI
- b) The telephone number, postal address and email address required under Condition B6
- c) A copy of the documents listed in Conditions A1 and A2 of the approval and any documentation relating to any modifications made to the CSSI or the terms of this approval
- d) A copy of the approval in its original form, a current consolidated copy of the 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
- e) A copy of an EPL required and obtained in relation to the CSSI (as / if required)
- f) A current copy of each document required under the terms of the approval, which must be published before the commencement of any relevant activity to which they relate or before their implementation, as the case may be
- g) A copy of the compliance reports required under Conditions A29 and A32 of the approval.

Where a CoA requires a document to be prepared prior to commencement of any work or Construction, a current copy of the relevant document will also be published on the Project website before the activity is undertaken.

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 or made available to the public. The Project's Environment Policy will be displayed on the Project website, at the site office/s, and communicated to staff and other interested parties via inductions and ongoing awareness programs.

This document is uncontrolled when printed. One controlled hard copy of the CEMP and supporting documentation will be maintained by Downer's Quality Manager at the Project office. Copies of this CEMP will be distributed via the Project document management system to:

- Downer's Project Director;
- Downer's Construction Director;
- Downer's Environmental Manager;
- Downer's Public Liaison Manager;
- Sydney Metro; and
- The ER.

3.2. Planning

3.2.1. Compliance tracking

In accordance with CoA A29, a Compliance Monitoring and Reporting Program must be prepared in order to monitor compliance with the terms of the project approval. Compliance reporting on the project will be undertaken in accordance with the requirements of the *City and Southwest – Sydenham to Bankstown Compliance Monitoring and Reporting Program Report* (Sydney Metro, 2019).

It is the responsibility of Sydney Metro to undertake the Compliance Tracking Program in accordance with the *City and Southwest – Sydenham to Bankstown Compliance Monitoring and Reporting Program Report* with input from Downer as required. A compliance matrix has been established for the project, incorporating CoA, REMM, licence conditions, permits and other approvals relevant to the Project to track issues and ensure compliance issues are addressed and closed out. Refer to Section 3.9.4 for further detail regarding the implementation of compliance tracking and reporting during Construction, in accordance with the *City and Southwest – Sydenham to Bankstown Compliance Monitoring and Reporting Program Report*.

3.2.2. Environmental objectives and targets

Refer to Section 1.4.

3.2.3. Environmental Work Method Statement and Environmental Control Maps

Environmental Works Method Statements (EWMS) have been / will be prepared for relevant Construction activities. Relevant Construction activities include those that pose a high risk to the environment, as determined by Downer. Downer will incorporate relevant mitigation measures

and controls, including those from relevant management Sub-plans and key procedures to be used concurrently with the EWMS. EWMS will be specifically prepared to communicate requirements, actions, processes and controls to Construction personnel using plans, diagrams and simple written instructions.

EWMS will be prepared progressively prior to and throughout Construction, in consultation with the relevant site management personnel. This will ensure that all issues are addressed, methods and activities are practical, and all personnel are aware of their commitments and responsibilities.

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; and
- Process for assessing the performance of the implemented mitigation measures.

All Construction personnel and subcontractors undertaking a task governed by an EWMS must participate in training on the EWMS 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 and environmental personnel to ensure its effectiveness and that all controls are being followed and that any non-conformances are recorded, and corrective actions implemented. Any improvements or changes identified in such reviews will be incorporated into subsequent revisions of the EWMS.

Environmental control maps (ECMs) are to be used in project inductions, work site set-up, as information in tender documents to subcontractors (where applicable) and in support of ancillary environmental approvals. ECMs will be prepared prior to Construction commencing.

The ECMs would be 'live' documents and updated to reflect the relevant works stage as works progress. The ECMs will be endorsed by Downer's Environment Manager (or delegate). The ECMs will be endorsed before being utilised.

The project ECMs shall include but not be limited to:

- Environmental procedures, environmental approvals, or licences that are applicable;
- The worksite layout and boundary, significant structures, entry/exit points and internal roads;
- Consideration of minimising light spillage to surrounding properties, in accordance with CoA E54;
- Location of environmentally sensitive areas and sensitive receivers;
- Environmental control measures;
- Endangered and Threatened Ecological Communities;

- Known cultural heritage sites;
- Known fauna habitat to be protected;
- Watercourses, wetlands and natural springs;
- Acid sulphate soils;
- Project boundaries and work locations;
- Environmental protection boundaries; and
- Designated “No-Go Zones”.

The ECMs would be in addition to any erosion and sediment control plans.

3.3. Resources, responsibilities and authority

Sydney Metro (the Proponent) has engaged Downer as the Principal Contractor to undertake the Dulwich Hill, Campsie and Punchbowl Station Upgrades Project. In accordance with the contract for the Project, Downer must perform certain roles and meet certain requirements under the Planning Approval. This includes consultation with key regulatory stakeholders, such as the NSW EPA, Natural Resources Access Regulator (NRAR) (formerly Department of Industry), Environment, Energy and Science (EES) (formerly OEH), Heritage NSW (formerly OEH) and relevant Councils, where required. DPE is the approval authority for a number of items required under the Planning Approval, including the CEMP and CEMP Sub-plans.

Sydney Metro have engaged, and received DPE approval, for an Independent ER for the Project. The Independent ER will perform the duties described within Table 8 Roles and responsibilities as per the requirements of CoA A26. Sydney Metro have also engaged an Independent Certifier to assess and certify project compliance. The role includes certification against environmental compliance.

Key responsibilities are indicated in Table 8. Note that this is not an exhaustive list of all site personnel and responsibilities. References to other roles and activities may be referred to throughout the CEMP and Sub-plans. Reporting lines are shown in the Organisation Chart in Figure 6.

Table 8 Roles and responsibilities

Position	Key Responsibilities and Authorities
<p>Project Director (Project Leader)</p>	<ul style="list-style-type: none"> • Reports to senior management within Downer • Ensure that internal audits of the system are conducted • Review audit corrective actions and act as necessary to ensure timely close out of issues • Authorise expenditure on environmental issues within limits of authority • Resolve major issues which cannot be resolved by the Project Manager • Must complete corporate and project induction covering environmental responsibilities and Downer’s environmental management system. • Ensure that project responsibilities and authorities are defined and communicated • Provide adequate resources to meet environmental objectives • Approve and implement the CEMP • Ensure that the CEMP is effectively implemented and maintained • Appoint/nominate and provide support for the Environmental Manager

	<ul style="list-style-type: none"> • Report to senior management on the performance of the system and environmental breaches • Take action to resolve environmental non-conformances, non-compliances and incidents • Ensure suppliers and subcontractors comply with requirements • Report environmental incidents to the client / local authorities as required • Liaise directly with the Independent Environment Representative as required and where appropriate to facilitate any environmental management requirements, including those identified within the Planning Approvals.
<p>Project Manager (Construction Manager)</p>	<ul style="list-style-type: none"> • Reports to the Project Director • Support the Project Director in environmental matters as required • Oversight of environmental requirements for design and Construction • Must complete corporate and project induction covering environmental responsibilities and Downer’s environmental management system. • Supervise all site Construction activities and personnel by ensuring that they meet environmental and other requirements • Organise and manage site plant, labour and temporary materials • Ensure that site environmental controls are properly maintained and provide support for the Environmental Manager • Report all environmental incidents • Take action to resolve non-conformances, non-compliances and incidents • Must complete corporate and project induction covering environmental responsibilities and Downer’s environmental management system. • Provide information to the Independent Environment Representative as requested and where appropriate, via the Project Environmental Manager.
<p>Procurement Personnel</p>	<ul style="list-style-type: none"> • Reports to the Project Director • Carefully select suppliers and subcontractors based upon their ability to meet stated requirements • Ensure that purchase orders and agreements include environmental requirements as necessary • Where practical, select materials which are “environmentally friendly” • Must complete corporate and project induction covering environmental responsibilities and Downer’s environmental management system. • Provide information to the Independent Environment Representative as requested and where appropriate, via the Project Environmental Manager.
<p>Project Environmental Manager</p>	<ul style="list-style-type: none"> • Reports to the Project Director • Ensure that the CEMP is effectively established, implemented and maintained at the project level • Ensure relevant licences, approvals and permits are obtained • Ensure compliance with all relevant statutes, regulations, rules, procedures, standards and policies • Carry out six monthly reviews of the CEMP and Sub-plans • Liaise with the ER and/or Superintendent on environmental issues, including the written notification of non-conformances (incidents, emergencies or deviations from the CEMP) and non-compliances • Ensure that all personnel on site receive appropriate environmental induction and training and are aware of their environmental responsibilities under the CEMP, relevant legislation and the contract • Report to the Project Director on the performance of the system and improvement opportunities • Provide support to the project team to enable them to meet their environmental commitments

	<ul style="list-style-type: none"> • Ensure that environmental records and files are collected and maintained • Regular compliance checking as required by this CEMP • Ensure that non-conformances, non-compliances and environmental incidents are recorded, and written reports provided to the Client’s Representative within 48-hours. Liaise with the required stakeholders to confirm the nature of the corrective action required and comply with the timeframe within which corrective actions must occur. • Ensure that environmental controls, materials and equipment are maintained • Conduct six monthly review of the CEMP • Develop and deliver environmental training materials in consultation with the Project Training Coordinator • Liaise directly with the Independent Environment Representative as required and where appropriate to facilitate any environmental management requirements, including those identified within the Planning Approvals. The Project Environmental Manager will be the primary contractor contact for the Independent Environmental Representative • Must have tertiary qualifications in environmental engineering / science along with relevant experience working in environmental management roles in Australia. Infrastructure Sustainability Accredited Professional preferred • Must complete corporate and project induction covering environmental responsibilities and Downer’s environmental management system • Minimum skill levels: • Minimum 10 years’ experience post qualification, with extensive experience in the preparation and implementation of environmental management systems and plans • Tertiary qualification in environmental science or engineering discipline or equivalent • Recent relevant experience in environmental management on major infrastructure projects.
<p>Project Environmental Advisor</p>	<ul style="list-style-type: none"> • Support the Environmental Manager in matters relating to environmental management • Must have tertiary qualifications in environmental engineering / science along with relevant experience working in environmental management roles in Australia. • Must complete corporate and project induction covering environmental responsibilities and Downer’s environmental management system • Liaise directly with the Independent Environment Representative as required and where appropriate to facilitate any environmental management requirements, including those identified within the Planning Approvals.
<p>Communication and Stakeholder Relations Manager</p>	<ul style="list-style-type: none"> • Leadership and management of the Communications, Stakeholder and Community Relations Team • Build and maintain effective working relationship with Sydney Metro’s representative and Stakeholder and Community Liaison team • Develops and oversees the implementation of the CCS and subplans • Responsible for a stakeholder and community relations induction and training program for all personnel involved in the performance of the project • Approves the Communications, Stakeholder and Community Relations team roles, role descriptions and responsibilities • Liaising with the Community Complaints Mediator, where required • Ensures the Community Communications Strategy and key activities are integrated into the project schedule • Attends the Sydney Metro led Communications Management Control Group and reports on activities, strategies and issues

	<ul style="list-style-type: none"> • Attends the monthly Project Management Review Group meeting to discuss project status and issues • Issues and crisis management • Manages media issues and acts as media spokesperson for the Principal Contractor (subject to media protocols) • Responsible for the Communications and Stakeholder Management KPI as well as the Communications and Stakeholder management component of the Quality of Information and Relationship with the Principal's representative KPI • Required to be on call 24 hours based on the team rotation • Liaise directly with the Independent Environment Representative as required and where appropriate to facilitate any environmental management requirements, including those identified within the Planning Approvals.
Community Place Manager	<ul style="list-style-type: none"> • Build and maintain effective working relationship with community, businesses, and stakeholders • Support the successful delivery of the project's Community Communication's Strategy and requirements • Implementation of the Community Communications Strategy and any relevant Sub-plans • Liaising with the Community Complaints Mediator, where required • Establish effective working relationships with local stakeholder to support the effective delivery of the project • Required to be on call 24 hours based on the team rotation to respond to enquiries and complaints. • Review, approve and oversee the development and distribution of all notification, newsletter, social media, photography, and other communication material. • Maintain the Consultation Manager database and generate reports as required. • Drives Communications and Stakeholder Management KPIs as well as the Communications and Stakeholder management component of the Quality of Information and Relationship with the Principal's representative KPI.
Project Training Coordinator	<ul style="list-style-type: none"> • Develop a Training Needs Analysis to identify relevant environmental training for all contractor (and subcontractor, where appropriate) personnel • Develop environmental training materials in consultation with the Project Environmental Manager • Organise external environmental training courses/material, where required • Provide information to the Independent Environment Representative as requested and where appropriate, via the Project Environmental Manager.
Site Foreman (Site Superintendents)	<ul style="list-style-type: none"> • Construction delivery in relation to environmental management and compliance in conjunction with the Project Environmental Manager • Authority to direct personnel and/or subcontractors to carry out actions to avoid or minimise unintended environmental impacts
Subcontractors	<ul style="list-style-type: none"> • Comply with all legal, contractual requirements and this CEMP • Comply with site environmental requirements • Comply with management / supervisory directions • Participate in induction and training as directed • Report all incidents • Environmental qualifications as required by contract • Must complete project induction covering environmental responsibilities and the Principal Contractor's environmental management system. • Provide information to the Independent Environment Representative as requested and where appropriate, via the Project Environmental Manager.
All Personnel	<ul style="list-style-type: none"> • Comply with the relevant Acts, Regulations and Standards • Comply with the Company's environmental policy and procedures

	<ul style="list-style-type: none"> • Promptly report to management on any non-conformances, non-compliances environmental incidents and/or breaches of the system • Undergo induction and training in environmental awareness as directed by management • Report all incidents • Act in an environmentally responsible manner • Must complete corporate and project induction covering environmental responsibilities and Downer’s environmental management system. • Provide information to the Independent Environment Representative as requested and where appropriate, via the Project Environmental Manager.
<p>Independent Environment Representative</p>	<ul style="list-style-type: none"> • Receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; • Consider and inform the Planning Secretary on matters specified in the terms of this approval; • Consider and recommend to Sydney Metro and Downer 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 Conditions C1, C3 and C8 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"> ○ 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 Planning Secretary for information or are not required to be submitted to the Planning Secretary); • Regularly monitor the implementation of the documents listed in Conditions C1, C3 and C8 to ensure implementation is being carried out in accordance with the document and the terms of this approval; • As may be requested by the Planning Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A34 of this approval; • As may be requested by the Planning Secretary, assist the Department in the resolution of community complaints; • Assess the impacts of minor ancillary facilities as required by Condition A19 of this approval; • Consider any minor amendments to be made to the documents listed in Conditions C1, C3 and C8 and any document that requires the approval of the Planning Secretary that comprise updating or are of an administrative or minor nature and are consistent with the terms of this approval and the documents listed in Conditions C1, C3 and C8 or other 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; and • Prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report detailing the ER’s actions and decisions on matters for which the ER was responsible in the preceding month. The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER’s engagement for the CSSI. • Must complete project induction covering Principal Contractor’s environmental management system.
<p>Independent Certifier</p>	<ul style="list-style-type: none"> • Assess and certify the Project for compliance, including environmental requirements.

<p>Utilities Coordination Manager</p>	<ul style="list-style-type: none"> • The management and coordination of all utility work associated with the delivery of the Project, to ensure respite is provided to the community, in accordance with CoA E22; • Establishing a Utilities Project Team with nominated representatives from utility service providers that may be impacted by the CSSI; • Coordination of meetings with utility service providers as requested by Sydney Metro’s Contractors; • Involvement with reviews of CSSI designs and Construction methodologies to assist with identifying potentially impacted utility assets; • Assist with coordination of design and Construction methodology reviews by utility service providers to identify necessary utility works; • Communicate with the Utilities Project Team, Sydney Metro, and Sydney Metro’s Contractors’ delivery teams to understand the proposed program of works to coordinate intercepting, interconnecting and interrelated works and manage priorities as they may arise; • Observation of utility works; and • Manage escalation of utility work-related issues within Sydney Metro and the utility service providers as required. • In conjunction with the Contractors, co-ordinate utility providers and relevant council(s) to identify opportunities for maintenance, replacement or augmentation of utilities that cross the rail corridor and facilitate and co-ordinate requests by the utility providers and relevant council(s) to undertake the Work during rail shutdowns • Collaborate with the communications team and as required, the Community Complaints Mediator, to ensure utility works are appropriately notified and any complaints are resolved.
<p>It is noted that;</p> <ul style="list-style-type: none"> • “Subcontractors” and “All personnel” are categorised as “Operational Personnel”. All other roles as listed above are categorised as “Management”. Refer to Section 3.5 for training requirements for each category. • Work must not commence until an ER has been approved by the Planning Secretary and engaged by the Proponent. • The Planning Secretary’s approval of an ER must be sought no later than one (1) month before the commencement of Work. • The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the EIS, SPIR or Submissions Report and is independent from the design and Construction personnel for the CSSI and those involved in the delivery of it. <p>It is the responsibility of Sydney Metro to engage an appropriate ER and seek approval from DPE.</p>	

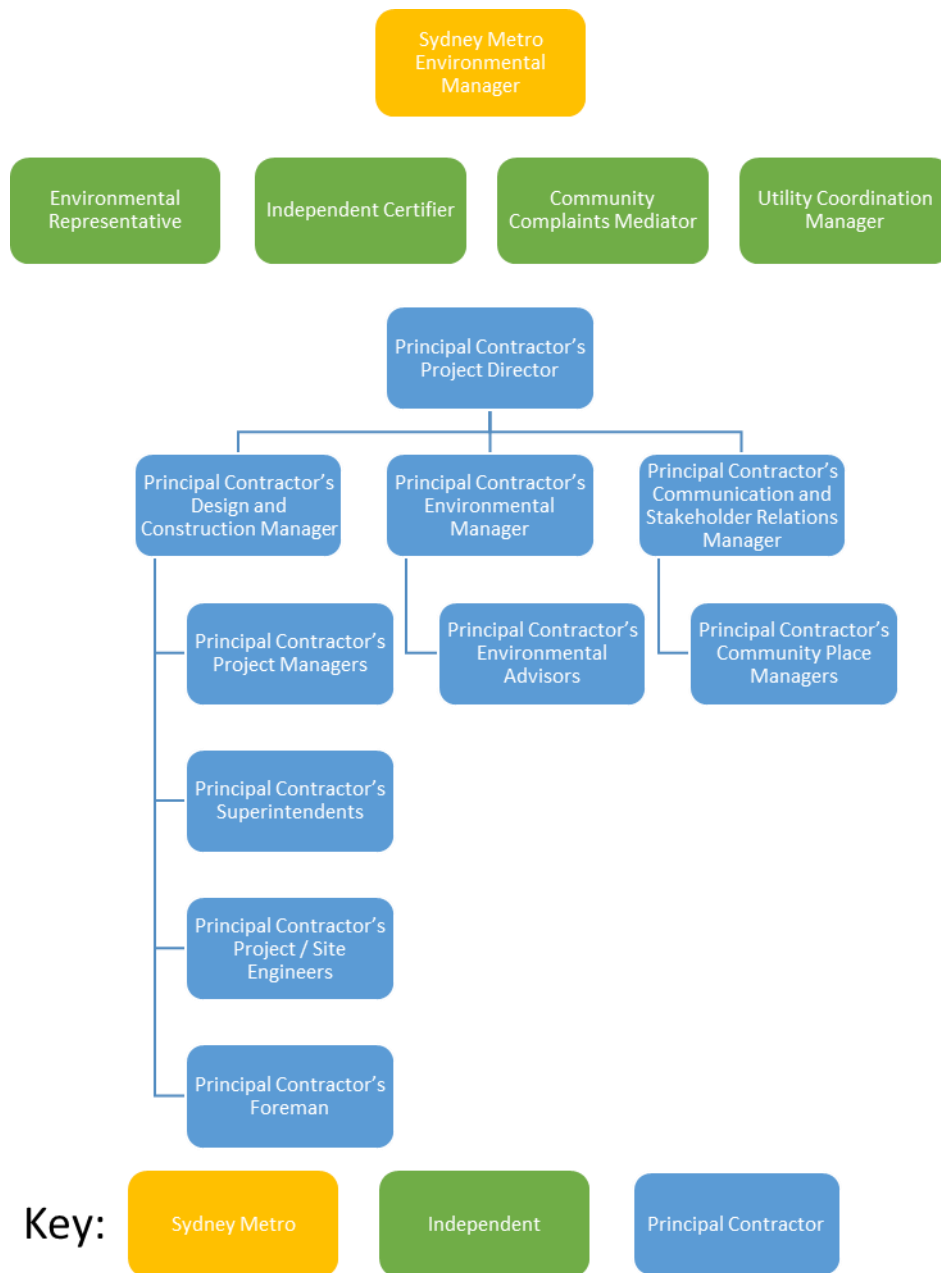


Figure 6 Organisation chart

3.4. Selection and management of subcontractors

Environmental requirements and responsibilities are to be specified to subcontractors in the contract documentation. All subcontractors engaged by Downer will be required to work under Downer’s EMS.

The supply of goods and/or services by suppliers and subcontractors will be managed in accordance with the following:

- During the tender phase, supply chain partners will be evaluated by Downer for their ability to meet the project’s environmental obligations. Environmental issues will be considered when selecting subcontractors and suppliers and as provided in the project's Procurement Management Plan;

- Supply, subcontract and consultancy agreements must address the relevant environmental compliance obligations;
- Agreements will outline the contractual requirements to be delivered by the supply chain through their scope of works;
- Suppliers of chemicals and hazardous substances will be required to submit SDS's with delivery or prior to chemicals arriving at site;
- Supply chain partners are to be required to nominate relevant environmental risks and proposed mitigation measures associated with their scope of work within their project specific documentation. As a minimum subcontractors Safe Work Method Statements must address the environmental risks associated with their site activities; and
- The environmental performance of subcontractors will be monitored by Downer during site inspections and in accordance with the obligations in their agreements and contracts.

3.5. Competence, training and awareness

Downer has established [10 Environmental Principles](#) (DG-ZH-PN002) that is a set of fundamental principles that all projects adhere to at all times. The Environmental Principles are prominently displayed on-site in communal areas, on notice boards and the Downer **IMS**.

Downer recognises the importance of employee training and induction, and the critical role it plays in supporting the safe and environmentally responsible conduct of project operations. Downer promotes the following:

- A person must not undertake an activity that pollutes, or might pollute, the environment unless the person takes all reasonable and practicable measures to prevent or minimise any resulting environmental harm.
- In determining what activities are required to be taken, the following are considered (amongst other things):
 - The nature of the pollution or potential pollution and the sensitivity of the receiving environment;
 - The current state of technical knowledge and likelihood of successful application of the activities that might be taken; and
 - The financial implications of the activities that might be taken, as those implications relate to the class of person undertaking activities of the same or a similar kind.

Downer manages project activities in such a manner as to:

- minimise impact to the environmental; and
- educate personnel on their responsibilities relating to protecting the environment.

All personnel have environmental management responsibilities and Downer ensures that these responsibilities are communicated to all personnel via appropriate environmental management training, including the initial environment induction.

3.5.1. Environmental induction

All personnel (including subcontractors) are required to attend a compulsory site induction that includes an environmental component before commencing work on site as per [DG-HR-ST013 Training & Competency Management Standard](#). The environmental component of the induction is tailored for each group of inductees (as applicable) to ensure that specific components of work are adequately addressed. This is to ensure all personnel involved in the Project are aware of:

- the requirements of the CEMP;
- the requirements of the EPL (if required);
- the REMMs and how they are to be implemented;
- the importance of conformance with environmental policy and procedures and the requirements of this CEMP and associated sub-plans;
- DG-ZH-PN002 10 Environmental Principles;
- the significant environmental aspects of the project work and the environmental benefits of improved work performance;
- their roles and environmental responsibilities for achieving conformance with environmental policy and procedures and with this CEMP, including site emergency management and response requirements; and
- the potential consequences of departure from specified operating procedures

This will aid in the prevention of any breaches of the CoA resulting from the actions of all persons invited onto any site, including contractors, subcontractors and visitors.

Short-term or temporary visitors undertaking inspections or entering site (e.g. regulators, delivery drivers) must undertake a visitor's induction and be accompanied by inducted personnel at all times. Subcontractors attending site are assessed by the relevant member of the project team on a case-by-case situation to determine they are required to undertake a visitor induction or full site induction. A visitor induction is valid for a period of 2 weeks.

In accordance with the CEMF, the environmental component of the induction would include as a minimum:

- Training purpose, objectives and key issues;
- Contractor's environmental policy and key performance indicators;
- Due diligence, duty of care and responsibilities;
- Relevant conditions of any environmental licence and/or the relevant conditions of approval;
- Site specific issues and controls including those described in the environmental procedures;
- Reporting procedure for environmental hazards and incidents; and
- Communication protocols.

A record of all environment inductions will be maintained and kept on site. Downer's Environmental Manager may authorise amendments to the induction at any time. Possible reasons for changes to the induction may be Project modifications, legislative changes or

amendments to this CEMP or related documentation. Legible environmental records of all environmental inductions will be kept in an Induction Register.

3.5.2. Toolbox talks, training and awareness

Toolbox talks will be used as a method of raising awareness and educating personnel on issues related to all aspects of Construction including project or site wide updates, any key or recurring environmental issues. The toolbox talks will be used to ensure environmental awareness continues throughout Construction and include details of EWMS for relevant personnel. Toolbox talks will also be tailored to specific environmental issues relevant to upcoming works. Toolbox talk attendance is mandatory and attendees of toolbox talks are required to sign an attendance form and the records maintained.

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. All employees (including subcontractors) may receive induction/training in the following (but not limited to):

- Environmental Policy;
- Site environmental objectives and targets;
- Understanding individual authorities and responsibilities;
- Basic understanding of their legal obligations;
- Site environmental rules;
- Emergency procedure and response (e.g. Spill clean-up);
- Relevant project specific and standard noise and vibration mitigation measures;
- Permissible hours of work;
- Any limitations on high noise generating activities;
- Location of nearest sensitive receivers; and
- Relevant licence and approval conditions.

To promote environmental awareness amongst the Construction team, environmental alerts will be issued as required and distributed amongst Downer's Project / Site Engineers and Supervisors which will be discussed during the daily pre-start meeting or during toolbox talks. In addition, the ECMs will be displayed in crib sheds and site offices to promote awareness of the environmental constraints. Erosion and Sediment Control Plans (ESCPs) will be distributed to Downer's Site Foreman to provide detail on erosion and sediment controls on the Project.

Environmental awareness may also be promoted to Construction personnel through the development and distribution of awareness notes. These will typically take the form of a poster, booklet, or similar and will be distributed to Downer's Engineers, Leading Hands, Site Foreman and others with a responsibility for managing specific work locations or activities. This documentation may be used to inform the broader workforce through either daily pre-start meetings (see Section 3.5.3) or provision in worker crib sheds / break facilities.

In accordance with the CEMF, Downer will conduct a Training Needs Analysis which identifies the competency requirements of staff that hold environmental roles and responsibilities as outlined in Table 8. This CEMP will be revised to include a summary of Downer's Training Needs Analysis.

Employee training and competency requirements are reviewed annually, or as an employee's role changes. Downer maintains a database of training records and employee competencies that provides capabilities such as tracking expiry of time limited competencies and programming of training requirements. This is done via the Training Matrix included in Appendix J.

A Training Register is to be maintained on Downer's information management system.

3.5.3. Daily pre-start meetings

The daily pre-start meeting is a tool for informing the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

Downer's Site Foreman 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. Daily pre-start meetings will be succinct in nature and generally take approximately 10-15 minutes.

The environmental component of pre-starts will be determined by Downer's relevant Site Foreman and environmental personnel and will include any environmental issues that could potentially be impacted by, or impact on, the day's activities as required. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained.

3.6. Working hours

Working hours for the Project are set by the CoA E19 to E26. Standard Construction hours as approved in the CoA E19 are as follows:

- Monday to Friday: 7:00 am to 6:00 pm;
- Saturday: 8:00 am to 6:00 pm; and
- At no times on Sundays or Public Holidays.

CoA E20 permits work outside of the hours specified in CoA E19, in the following circumstances:

- a) For the delivery of materials required by the NSW Police Force or other authority for safety reasons;
- b) 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;
- c) Where different Construction hours are permitted or required under an EPL in force in respect of the CSSI;
- d) Work approved under an Out-of-Hours Work Protocol for Work not subject to an EPL as required by Condition E25;
- e) Construction that causes LAeq(15 minute) noise levels:
 - i. 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

- ii. no more than the 'Noise affected' noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses, and
 - iii. continuous or impulsive vibration values, measured at the most affected residence are no more than the maximum values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), and
 - iv. intermittent vibration values measured at the most affected residence are no more than the maximum values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006).
- f) Where a negotiated agreement has been reached with a substantial majority of sensitive receivers who are within the vicinity of and may be potential affected by the particular Construction, and the noise management levels and/or limit for ground-borne noise and vibration (human comfort) cannot be achieved. All agreements must be in writing and a copy forwarded to the Planning Secretary at least one (1) week before the commencement of activities.

In accordance with CoA E24, except as permitted by an EPL, highly noise intensive works that result in an exceedance of the applicable NML at the same receiver will only be undertaken:

- Between the hours of 8:00 am and 6:00 pm Monday to Friday;
- Between the hours of 8:00 am and 1:00 pm Saturday; and
- 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 one-hour respite between recommencing any of the work that are the subject of the CoA.

There is no definition in the CoA SSI 8256 for "Highly Noise Intensive Works" as mentioned in CoA E24. Sydney Metro has adopted the following definition for "Highly Noise Intensive Works", based upon definitions within CoA issued by DPE for other SSI projects. For the purpose of this Project, Highly Noise Intensive Works are Construction activities which are defined as annoying under the ICNG, these include:

- Use of power saws, such as used for cutting timber, rail lines, masonry, road pavement or steel work;
- Grinding metal, concrete or masonry;
- Rock drilling
- Line drilling;
- Vibratory rolling;
- Rail tamping and regulating;
- Bitumen milling or profiling;
- Jackhammering, rock hammering or rock breaking; and
- Impact piling.

Any other works outside of standard Construction hours would be permitted providing they meet the requirements of CoA E20, an EPL (if applicable) or if they are undertaken as per the City and Southwest Out-of-Hours Work Protocol/Strategy (OOHW) as per CoA E25.

3.7. Communication

Achieving effective communication between all parties is critical to ensure that the requirements of this CEMP are met.

Downer uses a number of methods to communicate with employees, subcontractors, and visitors. The requirements, frequency, information, and methods of recording communication are outlined in the project's Stakeholder & Communication Management Plan, [Zero Harm Worker Consultation Standard \(DG-ZH-ST013\)](#), and project's Zero Harm risk management processes and procedures.

Typical methods of communication on site:

- pre-start meetings
- Zero Harm start-up (i.e. pre-commencement) toolbox talks
- Zero Harm inductions
- noticeboards
- toolbox talks; and
- environment alerts.

Pre-start and toolbox meetings include delivering key environmental messages and audit and inspection results and communicating environmental risks for the scheduled activities.

Pre-start meetings are minuted, and the minutes reviewed and signed by the meeting chairperson and made available to all Downer workers and visitors (if applicable) on site.

The Project Manager ensures that relevant documentation is filed electronically, and hard copies made available to personnel. Hard copy documentation made available to personnel typically includes:

- the project's Emergency Management Plan
- standard operating procedures
- work instructions
- Sydney Metro procedures/ policies
- fatal risk control standards
- risk assessments
- minutes of meetings; and
- copies of pertinent legislation and codes of practice.

Downer's dispute resolution process meets the requirements of the *Work Health and Safety Regulation 2017* and is included in [Zero Harm Worker Consultation Standard \(DG-ZH-ST013\)](#).

3.7.1. Internal communication

Clear lines of communication throughout all levels and functions (e.g. management, staff and subcontracted service providers), are key to minimising environmental impacts and achieving continual improvements in environmental performance.

Downer's environmental 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 may also be scheduled with the ER, Sydney Metro environmental personnel. The purpose of these meetings would be to communicate ongoing environmental performance and to identify any issues to be addressed.

In addition, Construction environmental team members will participate, as required, in toolbox talks, daily pre-start meetings or activity specific pre-start meetings to communicate environmental performance, management or issues with the wider Construction team. This forum will provide an opportunity for the environment team members to 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 as described in Section 3.5.

3.7.2. Liaison with government authorities or other relevant stakeholders

Downer's Environmental Manager will be the authorised contact person for communications with the relevant stakeholders i.e. Sydney Metro, the ER, DPE and the EPA (if required) on environmental matters. Liaison will include reporting on the ongoing environmental performance, any key environmental matters on the Project to these stakeholders. Relevant government agencies will be consulted throughout Construction as required.

Where changes are made to the CEMP or Sub-plans following consultation, updates will be recorded in the relevant version control section(s).

Incident notification will be undertaken in accordance with the requirements of CoA A36 and A37 (refer to Section 3.10.3).

Liaison with government authorities and relevant stakeholder would be undertaken as per Section 8 of the Sydney Metro Overarching Community Communication Strategy (OCCS).

3.7.3. Community liaison and/or notification

Direct communication with the media and general public is not permitted. Any requests from the media or general public are referred to the Project Manager who acts in accordance with the project's Stakeholder & Communication Management Plan.

All direct communication with statutory authorities is approved by the Project Manager or the Safety Manager.

Sydney Metro also has specific requirements relating to external communications.

Sydney Metro has prepared an OCCS in accordance with CoA B2 to provide an approach to stakeholder and community communications. This plan identified opportunities and key communication tools needed to provide information and consult with the community and stakeholders during Construction of the Project. Section 8 of the OCCS outlines how community liaison and/or notification would be undertaken.

The OCCS also includes the process for notifying external stakeholders of new, changed or upcoming Construction works, including works outside of normal working hours. The OCCS has been submitted to DPE for approval prior to the commencement of works in accordance with CoA B3.

In accordance with Section 1 of the OCCS, the contract-specific communication team is responsible for developing a contract-specific Community Communication Strategy (CCS) for the Project.

3.7.4. Complaints management

In the event of a third-party environmental complaint the following steps will be taken by Downer:

- records complaints as an incident in INX
- investigates and verifies complaints, and assesses if excessive off-site impacts have occurred
- implements corrective measures including modification of execution methods and operational techniques to avoid recurrence or minimise ongoing adverse impacts
- completes monitoring/ additional investigations to verify the adequacy of the recommendations, as required
- notifies the complainant of actions taken; and

continues to monitor activity, if required.

Sydney Metro's OCCS details the Complaints Management System, which includes a Complaints Register, which has been developed for the Project, in accordance with the requirements of AS 4269: Complaints Handling and CoA B5, B6, B7, B8 and B9.

As required by CoA B8(a)(b)(c) the Complaints Register must record the:

- a) Number of complaints received
- b) Number of people affected in relation to a complaint
- c) Means by which the complaint was addressed and whether resolution was reached, with or without mediation.

The Complaints Register will be provided to the ER on a daily basis, in accordance with CoA A27(a). Please refer to the OCCS for more information about complaints management. Sydney Metro's OCCS also outlines how the Project will interface with the Community Complaints Mediator, as required, in accordance with CoA B10 to B13.

3.8. Emergency and incident response

In accordance with [Emergency Management Procedure \(DG-ZH-PR015\)](#), the project team establishes an Emergency Management Plan for the project which addresses all emergency response scenarios. Common types of environmental emergencies include:

- sewage spills (to land or to water)
- emulsion spills (to land or to water)
- hydrocarbon spills (to land or to water)
- sediment discharge (to land or to water)

- unexpected finds (cultural heritage); and
- damage to heritage items or protected flora and fauna.

In the event of an incident that may have resulted in a near miss or an impact to the environment or community, Downer employees are expected to respond appropriately in accordance with [Incident Management Procedure \(DG-ZH-PR006\)](#) and the [Sydney Metro Incident and Non-compliance Reporting Procedure](#).

3.8.1. General emergency and incident response

The EPA must be notified immediately of all pollution incidents that cause or threaten material harm to the environment. Downer will enact the Emergency Response Plan if an incident causes or has the potential to cause material harm.

As per the Planning Approval's definition, material harm "*is harm that:*

- *involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or*
- *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)."*

If an incident presents an immediate threat to human health or property, 000 is to be called in accordance with the procedures outlined in the Construction Health and Safety Management Plan.

The EPA Environment Line is to be contacted on 131555.

The notification will need to include information on:

- 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.

In addition to notifying the EPA of pollution incidents other authorities as outlined below must also be notified immediately, where relevant:

- Sydney Metro;
- The ER;
- DPE;
- The NSW Ministry of Health (via the local Public Health Unit – 02 9391 9000);
- The SafeWork NSW (13 10 50);

- Inner West Council (where the incident has occurred within this LGA) – (02 9707 9000);
- City of Canterbury Bankstown (where the incident has occurred within this LGA) – (02 9392 5000); and
- Fire and Rescue NSW on 000.

Regardless of the actual or potential impact, these authorities must be notified under the amended legislation for all notifiable pollution incidents. Further information in relation to the incident must be provided immediately if it becomes available after the initial notification. Records of contact with and details of the information provided to external authorities must be maintained in the project records.

Incident notification will be undertaken in accordance with the requirements of CoA A36 and A37 and the Sydney Metro Incident and Non-compliance Reporting Procedure (refer to Section 3.10.3 and Appendix F).

3.9. Monitoring, inspections and auditing

3.9.1. Environmental inspections

Ongoing inspection of environmental mitigation measures will be undertaken by Downer's Site Foreman. Weekly site environmental inspections will be undertaken by Downer's Environmental Manager to assess the ongoing effectiveness and suitability of the Project's environmental controls. The site environmental inspections will cover the following:

- High risk activities and processes;
- Work in environmentally sensitive areas; and
- Site preparedness for adverse weather conditions, including adequacy of environmental controls and availability of emergency equipment.

Copies of all environmental inspection reports prepared by Project environmental staff will be kept with the Project records and closed out within the agreed timeframes. These timeframes will be dependent on the nature of the required corrective action and the environmental risk associated with the outstanding action as determined by Downer's Environmental Advisor or Environmental Manager. The outcomes of inspections will be captured on Environmental Inspection Checklists.

In general, the corrective action will concentrate on the environmental management system and its associated processes rather than on the perceived deficiencies of individual workers.

If any maintenance and/or deficiencies in environmental controls or in the standard of environmental performance are observed, they will be recorded in an environmental action list. Records will also include details of any maintenance required, the nature of the deficiency, any actions required and an implementation priority. The environmental action list will then be issued to the relevant Downer Site Foreman for actioning. Actions will be assigned an implementation priority by Downer's Environmental Advisor based on environmental risk. Actions are closed out by Downer Site Foreman and evidence of close out (usually a photograph) is to be supplied back to the Environmental Advisor.

When an observation is raised of a significant nature, and where deemed necessary by Downer's Environmental Manager, an Environmental Improvement Notice (EIN) may be issued to either the Engineering Supervisor or the subcontractor supervisor in charge of the work activity and/or an individual. The engineer or individual receiving the improvement notice

will be required to respond to the agreed corrective action as outlined on the notice. The timeframe to respond would be determined by Downer's Environmental Manager and documented in the EIN. Examples of observations deemed to be of a significant nature would include, but are not limited to, those that require immediate action due to potential environmental risk or recurring issues.

The completed EIN must be reviewed and followed-up to ensure they are promptly completed. Repetitive observations that have significant hazards should be reviewed to check that a system failure is not occurring. Downer's Environmental Advisor will confirm close out of the EIN and report this to Downer's Environmental Manager.

Regular site inspections will be completed by the Environmental Representative (ER) and Sydney Metro representatives. These will be conducted at a frequency to be agreed by all parties. However, at minimum they will have a monthly frequency.

In addition to planned internal audits, the project team verifies environmental conformance to this document as per the reviews in the following table and [DG-ZH-PR116.1 Inspections Procedure](#).

Type of Review	Goal	Frequency	Responsible Person
Solid Wastes	<ul style="list-style-type: none"> ▪ All waste removed from the site will be appropriately tracked from ‘cradle to grave’ using waste tracking docketts. ▪ Waste minimisation through implementation of the waste hierarchy ▪ Recycling where practical and economically feasible. ▪ Appropriate use of landfill site for disposal. ▪ Appropriate placement and use of site amenities. ▪ Compliance with Waste and Spoil in Appendix E in CEMP 	<ul style="list-style-type: none"> ▪ Informal daily monitoring by site team ▪ Weekly inspections will include checking on the waste storage facilities on site using the Environment Inspection Checklist ▪ Audits of receiving facilities (recyclers/landfills/other) minimum of 1 every 6 months) 	<ul style="list-style-type: none"> ▪ Environmental Advisor/ Project Manager (PM)
Flora and Fauna	<ul style="list-style-type: none"> ▪ Protection of protected species ▪ Prevent the spread of weeds ▪ Compliance with Biodiversity in Appendix E in CEMP. 	<ul style="list-style-type: none"> ▪ Informal daily monitoring by site team ▪ Weekly inspections using the Environment Inspection Checklist 	<ul style="list-style-type: none"> ▪ Environmental Advisor/ Project Manager (PM)

Type of Review	Goal	Frequency	Responsible Person
Erosion and Sediment Control Measures	<ul style="list-style-type: none"> ▪ No adverse impacts to receiving water quality ▪ Implementation, monitoring, and maintenance of all soil erosion and sediment control measures defined in the Soil & Water Management Plan and associated documents. 	<ul style="list-style-type: none"> ▪ Informal daily, ▪ Weekly inspections using the Environment Inspection Checklist 	<ul style="list-style-type: none"> ▪ Environmental Advisor/ Project Manager (PM)
Work site storage and handling of fuels, oils, chemicals, and paints	<ul style="list-style-type: none"> ▪ Compliance with dangerous substances regulations and hydrocarbons and chemicals procedures defined in the project's Health and Safety Management Plan. 	<ul style="list-style-type: none"> ▪ Informal daily monitoring by site team ▪ Weekly inspections using the Environment Inspection Checklist 	<ul style="list-style-type: none"> ▪ Site Supervisor / Zero Harm Advisor / Environmental Advisor / Project Manager (PM)
Hydrocarbon and Oil Spills	<ul style="list-style-type: none"> ▪ Compliance with the project's Health and Safety Management Plan. 	<ul style="list-style-type: none"> ▪ Daily visual monitoring by site team ▪ Weekly inspections using the Environment Inspection Checklist 	<ul style="list-style-type: none"> ▪ Site Supervisor / Environmental Advisor / Project Manager (PM)
Air Quality and Dust Management	<ul style="list-style-type: none"> ▪ Minimise the impact of dust, odour and fumes on the community ▪ Compliance with the Air Quality in Appendix E in CEMP. 	<ul style="list-style-type: none"> ▪ Visual monitoring by Zero Harm Advisor and/or Site Supervisor. ▪ Spot checks of sites and weekly inspections using the Environment Inspection Checklist 	<ul style="list-style-type: none"> ▪ Site Supervisor / Zero Harm Advisor / Environmental Advisor / Project Manager (PM)

Type of Review	Goal	Frequency	Responsible Person
Water management	<ul style="list-style-type: none"> ▪ Avoid the use of potable water where possible ▪ Protect environmental values of receiving water ▪ Compliance with the TfNSW Water Discharge and Reuse Guideline ▪ Compliance with the Soil and Water Management Plan 	<ul style="list-style-type: none"> ▪ As required – to be monitored through dewatering applications and permits ▪ Daily informal monitoring by Site Supervisor and site team ▪ Weekly using Environment Inspection Checklist 	<ul style="list-style-type: none"> ▪ Site Supervisor / Environmental Advisor / Project Manager (PM)
Heritage	<ul style="list-style-type: none"> ▪ Protect items with heritage value ▪ Maintain compliance with the Heritage Management Plan 	<ul style="list-style-type: none"> ▪ Daily informal monitoring by Site Supervisor and site team ▪ Weekly using Environment Inspection Checklist ▪ Heritage-specific inspections to be carried out before, during and after vibration-generating works within 'safe working distances. 	<ul style="list-style-type: none"> ▪ Site Supervisor / Environmental Advisor / Project Manager (PM)
Noise and Vibration	<ul style="list-style-type: none"> ▪ Reduce the impact of noise and vibration on sensitive receivers ▪ Maintain compliance with the Project Noise and Vibration Management Plan 	<ul style="list-style-type: none"> ▪ As per Appendix A of the Construction Noise and Vibration Monitoring Guideline of City and Southwest Construction Noise and Vibration Strategy (SM ES-ST-210) ▪ Refer to SM CEMF Section 9 Construction Noise and Vibration Management 	<ul style="list-style-type: none"> ▪ Environmental Advisor / Project Manager (PM)

Type of Review	Goal	Frequency	Responsible Person
Additional risk-mitigation measures	<ul style="list-style-type: none"> Compliance to SWMS requirements and the CEMP and any relevant sub-plans. 	<ul style="list-style-type: none"> Daily informal monitoring by Site Supervisor and site team Weekly using Environment Inspection Checklist 	<ul style="list-style-type: none"> Environmental Advisor / Project Manager (PM)
Housekeeping	<ul style="list-style-type: none"> Tidy work site with no litter and all waste contained in appropriate containers. Containers to be emptied and disposed of at appropriate intervals. Compliance with all Sub Plans 	<ul style="list-style-type: none"> Daily informal monitoring by Site Supervisor and site team Weekly using Environment Inspection Checklist; 	<ul style="list-style-type: none"> Environmental Advisor / Project Manager (PM)

3.9.2. Environmental monitoring

Environmental monitoring will be undertaken to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this CEMP, and to address approval requirements. The monitoring requirements for required aspects are included in the relevant environmental management Sub-plans and summarised in Table 9.

Table 9 Summary of Construction phase environmental monitoring required by the Project approval

CoA / EMM	Description	Relevant Sub-plan or CEMP Chapter	Reporting Requirements
C8(a)	Noise and Vibration Monitoring Program	NVMP – Section 8	Submitted to the Planning Secretary and relevant regulatory authorities for information at a frequency as specified in the monitoring program.
C8(b)	Water Quality Monitoring Program	SWMP – Section 6	Submitted to the Planning Secretary and relevant regulatory authorities for information at a frequency as specified in the monitoring program.

3.9.3. Auditing

Sydney Metro’s *City and Southwest Compliance Monitoring/Tracking and Reporting Program Report* (Sydney Metro 2019) has been prepared to satisfy the obligations of CoA A33-A35. In accordance with the *City and Southwest Compliance Monitoring/Tracking and Reporting Program Report*, two levels of environmental auditing will be undertaken on the Project:

- Internal auditing coordinated by the Principal Contractor; and
- Via the independent Environmental Audit Program (EAP).

These audits will be conducted at the frequency outlined within the Audit Schedule, an Indicative version of this is contained within Appendix K.

In addition to these, the Project may be audited by the Secretary upon the Secretary's request. In this event, the ER will facilitate the audit on behalf of the Secretary in accordance with CoA A26(f).

Audits will include works undertaken by subcontractors. Internal and external environmental audits will be undertaken and prepared in accordance with the terms of the project approval and AS/NZS ISO 19011:2014.

The ER will ensure that environmental auditing is undertaken in accordance with this CEMP and the Project's environmental management system, in accordance with CoA A26.

Internal audits undertaken in accordance Section 4.4.3.1 of the *City and Southwest Compliance Monitoring/Tracking and Reporting Program Report* will be carried out on a six-monthly basis. Independent Environmental Auditing will be conducted at a frequency set out in the EAP.

Downer conducts internal environmental audits in accordance with [Downer's Internal Audits Procedure](#) (DG-QA-PR003) to ensure the ongoing adequacy and effectiveness of the **IMS** (which includes the EMS), and to facilitate continuous improvement.

Environmental audits are planned and scheduled with all other project audits, and detail the type of audit, duration, auditors (including the Lead Auditor), and dates. Refer to the project's Quality Management Plan for further information.

The findings from internal audits on the implementation of the requirements of this document and **IMS** for the project are provided to the Project Manager. Any Sydney Metro requirements for audits are also defined in the project's Quality Management Plan.

Audits are conducted by personnel with the relevant expertise.

In addition to planned internal audits, the project team verifies environmental conformance to this document as per the reviews in the table in Section 3.9.1 environmental inspections and Downer's [Inspections Procedure \(DG-ZH-PR116.1\)](#).

3.9.4. Construction phase compliance tracking

In accordance with CoA A29 to A32, Sydney Metro has developed the *City and Southwest Compliance Monitoring/Tracking and Reporting Program Report*. Compliance reporting on the Project will be undertaken in accordance with the requirements of this document throughout the Construction phase of the Project.

In accordance with the *City and Southwest Compliance Monitoring/Tracking and Reporting Program Report*, Downer will undertake quarterly reviews of the compliance requirements contractually allocated to them by Sydney Metro. These reviews are a collaborative exercise undertaken between Downer, Sydney Metro and the ER. The Compliance Tracking Review process is as follows:

- Upon the award of each major contract, Sydney Metro to issue a Compliance Tracking Register (CTR) template containing a list of all the compliance

requirements contractually allocated to Downer. Downer is required to complete the template and return to Sydney Metro no later than two weeks prior to the anticipated commencement of Construction activities.

Downer is to complete the template by demonstrating how compliance against each requirement has been addressed from the date of contract award to the date the CTR is due to be returned to Sydney Metro (including references to evidential documentation). This completed CTR will be used by Sydney Metro to prepare any documentation required to prepare/update the applicable Pre-Construction Compliance Report

- Following the commencement of Construction, Downer is to complete a new CTR to cover all activities from the commencement of Construction until the end of the existing or subsequent calendar quarter (as determined by Sydney Metro). Downer must issue the completed CTR to the ER within five working days following the end of the reporting period. The ER will review the CTR and where necessary, provide comments and/or requests for evidence to Downer. The ER will provide the Planning Approvals Compliance Report only after all comments have been addressed, and all evidence requested during the CTR has been provided by Downer.
- Within five working days of receiving the final completed CTR (and any evidence requested) from Downer, the ER is to issue a draft Planning Approvals Compliance Report (with the associated completed CTR) to Sydney Metro for comment. After reviewing any comments, the ER is to issue a final Compliance Summary Report to Sydney Metro.
- Following receipt of the final Compliance Summary Report from the ER, Sydney Metro will issue the next quarterly period CTR template to Downer for completion. This process repeats every quarter until all compliance requirements have been 'completed' (refer to Section 4.3 of the City and Southwest Compliance Monitoring/Tracking and Reporting Program Report).

In the event of a non-compliance against a requirement at any time during this process, a summary of the non-compliance needs to be entered into the relevant CTR template. This is in addition to the requirements of the Sydney Metro Environmental Incident and Non-Compliance Reporting Procedure SM-17-0000096 (refer to Appendix F).

Downer compliance tracking is undertaken on a continuous nature during execution using Downer's compliance management system INX, which allows authorised users to:

- access the Compliance Tracking Database, Incident Reporting Database, and Complaints Register; and
- sort and evaluate the compliance status of all conditions at any time.

The Compliance Tracking Database includes a protocol to address:

- auditing requirements;
- reporting requirements;
- incident response mechanisms; and
- Compliance with SM quarterly *Compliance Monitoring/Tracking and Reporting Program Report*.

3.10. Environmental incidents non-conformances and non-compliances

All environmental incidents, non-conformances and non-compliances must be reported to the ER and Sydney Metro in accordance with Sydney Metro Environmental Incident and Non-compliance Reporting Procedure SM-17-00000096 (refer to Appendix F).

3.10.1. Environmental incidents under Sydney Metro

The Environmental Incident and Non-compliance Reporting Procedure is summarised below.

Sydney Metro has defined an Environmental Incident as:

An occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred or is likely to have occurred.

Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items, or adverse community impacts.

The Instrument of Approval defines an incident as:

An occurrence or set of circumstances that causes or threatens to cause material harm¹ and which may or may not be or cause a non-compliance.

Environmental incidents are classified into three classes that are based upon the consequence descriptors for environmental risks in the Sydney Metro Risk Matrix (refer to Sydney Metro Risk Management Standard). These classifications trigger a variety of management actions and/or legislative requirements depending on the severity of the consequence described where Class 3 represents minor consequences and Class 1 represents major consequences.

This matrix is further sub-divided into consequence ratings ranging from C6 (low impact) to C1 (high impact). An incident transitions between a Class 3 to a Class 2 incident once material harm has been caused, and transitions into a Class 1 incident once it is determined that the Environmental Harm caused is large-scale and cannot be remediated (see Table 10).

Table 10 Classification System for Environmental Incidents

Class 3		Class 2		Class 1	
C6	C5	C4	C3	C2	C1
No appreciable changes to environment and/or highly localised event	Change from normal conditions within environmental regulatory limits and environmental effects are within site boundaries	Short-term and/or well-contained environmental effects. Minor remedial actions probably required	Impacts external ecosystem and considerable remediation is required	Long-term environmental impairment in neighbouring or valued ecosystems Extensive remediation required	Irreversible large-scale environmental impact with loss of valued ecosystems

¹ Material harm is harm that: (a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or (b) 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).

All incidents and complaints (including potential incidents) must be reported so that they can be investigated and prevented from recurring. Incidents, non-conformances and non-compliances are to be recorded using the Environmental Incident and Non-compliance Report Form (SM ES-FT-403), by Downer. It is expected that the person responsible for completing the Environmental Incident and Non-compliance Report Form makes appropriate enquiries to determine the likely causal factors involved and assigns effective corrective actions. Corrective actions are to be raised, addressed and closed-out in accordance with Downers own internal relevant management system procedure. When an environmental incident occurs which causes environmental harm, in all cases both verbal and written communication of the incident must be carried out immediately and within 48 hours respectively. For Class 1 and 2 Incidents the notification process shown in Figure 7 must be followed. Incident Notification Reports satisfy the requirement for written communication to Sydney Metro and are to be completed using the Environmental Incident and Non-compliance Notification Report (SM ES-FT-403) or a similar and consistent form approved by Sydney Metro.

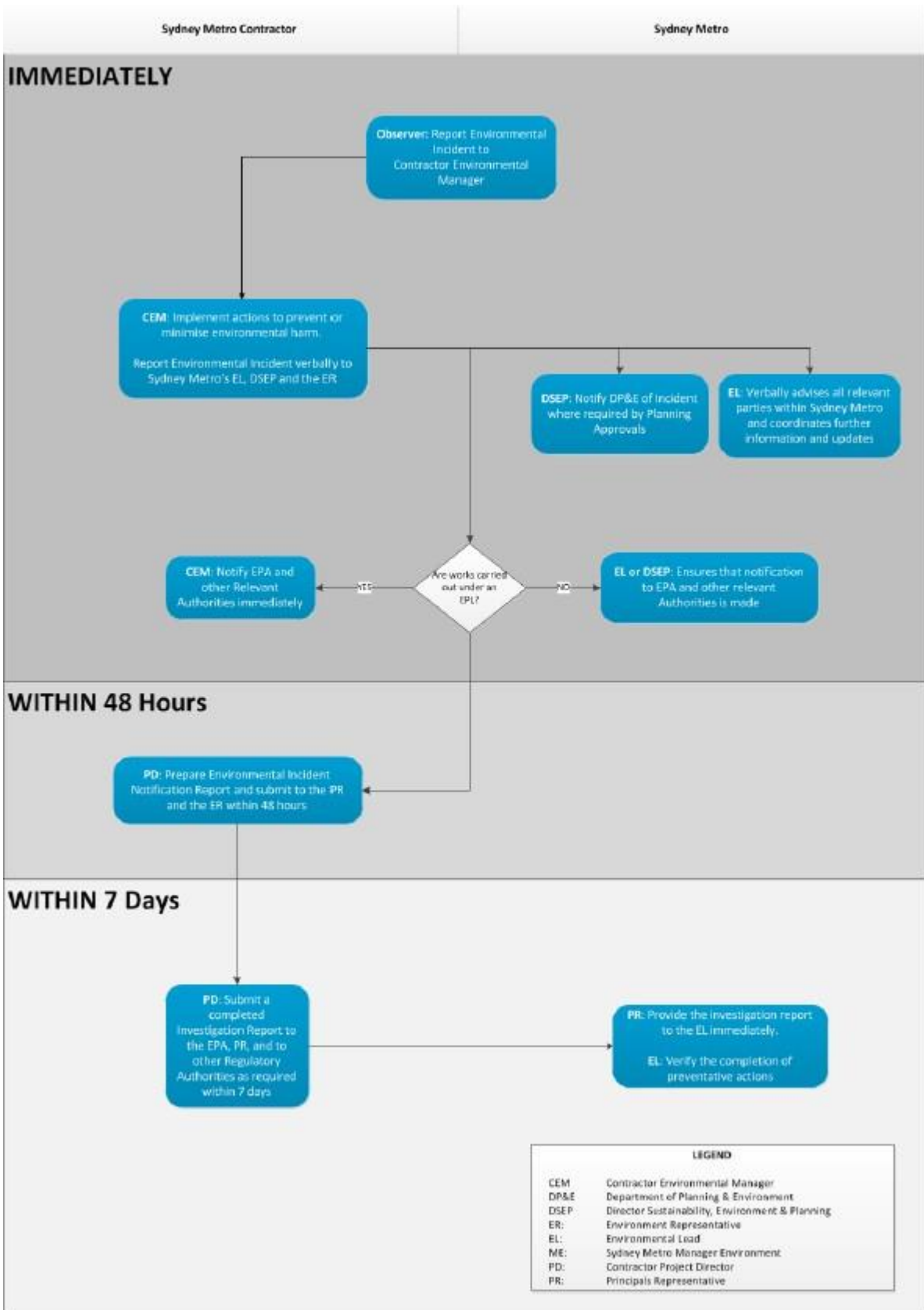


Figure 7 Environmental incident notification process for Class 1 and 2 Incidents

3.10.2. Review of compliance

An environmental non-compliance is a breach of an environmental requirement originating from Planning Approvals, EPLs, lease agreements, and other requirements documented in environmental management plans. Whether an event is classified as a Non-compliance, Non-conformance or an Incident the process behind managing the event remains the same, with the following exceptions:

- Non-compliances are not notifiable to Regulatory Authorities under the POEO Act;
- Non-compliances are reported to have occurred on the day the breach was raised as opposed to the date when the requirement was breached;
- Non-compliances are not divided into severity classes;
- Non-compliances do not have the potential to trigger crisis or emergency management processes; and
- There is an informal notification process in the immediate timeframe following a Non-compliance being raised.

When an Environmental Event (as defined by the Sydney Metro Environmental Incident and Non-compliance Reporting Procedure) occurs that causes Environmental Harm and also breaches one or more Environmental Requirements, then an Incident Notification Report will be created which records what requirements were breached.

If a Non-compliance is identified, then it must be raised using the Environmental Incident and Non-compliance Report Form within 48 hours by the party responsible for the breach.

Downer's subcontractors found to be in breach of this document are managed in accordance with the subcontract under which they have been engaged.

Employees who breach the requirements of this document are managed in accordance with the project's Employee Relations Management Plan. Personnel found to be grossly negligent or commit an intentional environmental breach are removed from site and managed in accordance with the project's Employee Relations Management Plan.

Non-compliances raised by Sydney Metro and via internal project audits are registered and controlled in accordance with Downer's [Incident Management Procedure \(DG-ZH-PR006\)](#).

Possible non-compliances include non-compliance with the management measures outlined in this [document](#), and mitigation strategies/ management measures outlined in the Environmental Management sub-plans.

Where detected, any non-compliance or environmental impact exceeding specified limits are investigated by the Environmental Advisor to determine the extent of possible non-conformance. The non-compliance is corrected as soon as possible with necessary action taken to prevent recurrence.

All non-compliances are reported to Sydney Metro and clearly identify the corrective/ preventative actions to be taken and the close-out date.

3.10.3. Department of Planning and Environment incident notification

The Conditions of Approval define an incident as:

An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not cause a non-compliance with this approval.

Environmental incident and notification requirements are outlined in CoA’s A36 and A37 and Appendix A of the Instrument of Approval. These requirements are outlined in Table 11. Any incidents would be notified to the Planning Secretary in accordance with these requirements.

Table 11 Incident notification to DPE

CoA/Requirement	Details
CoA A36	The Department must be notified in writing to compliance@planning.nsw.gov.au 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.
CoA A37	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix A (of SSI-8256) .
Appendix A - 1	A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven (7) days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under Condition A37 or, having given such notification, subsequently forms the view that an incident has not occurred.
Appendix A - 2	Written notification of an incident must: <ul style="list-style-type: none"> (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; and (h) identify a project contact for further communication regarding the incident.
Appendix A - 3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Proponent 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.
Appendix A - 4	The Incident Report must include: <ul style="list-style-type: none"> (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; and (d) details of any communication with other stakeholders regarding the incident.

3.11. Work in environmentally sensitive areas

Addressed in Section 3.2.3 of this CEMP.

3.12. Ancillary site facilities

Ancillary site facilities used as part of the Project are discussed in Section 1.1.

3.12.1. Ancillary facilities approval pathways

Ancillary facilities proposed to be used as part of the Project are discussed in Section 1.1. However, any ancillary facilities outlined in the Approval Documents may be used by the Project.

As per CoA A16 ancillary facilities not identified in the Approval Documents can be established and used if:

- a) they are located within the Construction boundary of the CSSI; and
- b) they are not located next to a sensitive receiver (including access roads) (unless landowners and occupiers have accepted in writing 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), and 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.

If proposed ancillary facilities are not identified in the Approval Documents and cannot satisfy the conditions of CoA A16 they can only be established and operated when a review of environmental impacts has been prepared as per CoA A17. When the proposed ancillary facility is located within the rail corridor the review of environmental impacts may be endorsed by the ER. When the proposed ancillary facility is located outside the rail corridor the review of environmental impacts would require approval of the Planning Secretary.

Minor ancillary facilities are defined in CoA A19 as:

Lunch sheds, office sheds, portable toilet facilities, and the like, that are not identified as an ancillary facility in the documents listed Condition A1

As per CoA A19, minor ancillary facilities can be established where they satisfy the following criteria:

- a) are located within the Construction boundary; and
- b) have been assessed by the ER to have –
 - i. minor amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (ICNG) (DECC, 2009), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and
 - ii. minor environmental impact with respect to waste management and flooding, and
 - iii. no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.

In accordance with CoA A18, the use of an ancillary facility for the Construction of this Project must not commence until this CEMP and the Project’s Sub-plans (including monitoring programs therein), have been approved by the Planning Secretary.

3.12.2. Boundary screening approach

Boundary screening will be erected around ancillary facilities that are adjacent to sensitive receivers as required under CoA A20 and A21. This will be for the duration of Construction unless otherwise agreed with relevant councils, and affected residents, business operators or landowners. All boundary screening will minimise visual, noise and air quality impacts as required by CoA A21. Boundary screening at sites would be consistent with the requirements identified in the Construction Noise and Vibration Impact Statement’s (CNVIS) (refer to NVMP). All fencing and hoarding will be in accordance with the requirements of the OCCS.

3.13. Hold points

The activities outlined in Table 12 are not to proceed without objective review and approval by the nominated authority. These activities are considered hold points. The hold points should be incorporated into the working plans for the project (EWMS, work instructions, Construction methodologies, etc.).

Table 12 Hold points

Item	Process Held	Acceptance Criteria	Approval Authority
Construction Environmental Management Plan and Sub-plans	Site activities	Site specific Construction Environmental Management Plan and Sub-plans have been developed, reviewed and approved.	Department of Planning and Environment.
Monitoring Program Amendments (CoA C13)	Amendments to Monitoring Program(s) (during Construction, as per CoA C13)	Amendments have been reviewed and approved for implementation.	ER Endorsement and Approval
CNVIS	Site activities (Prior to Construction commencement)	CNVIS to be prepared by Specialist Consultant.	ER Endorsement
Specific Environmental Control Maps (ECMs)/ progressive ESCPS	Dulwich Hill Station works Campsie Station works Punchbowl Station works	ECMs/PESCPs are developed with site specific environmental controls/mitigation measures with site supervisor/engineers for work activities and are to be implemented prior to works commencing (or a new work stage as appropriate).	Environmental Manager or Coordinator
Works that require a Project Approval Consistency Assessment	Specific site activities related to Consistency Assessment.	Consistency Assessment approval.	Sydney Metro (Approval)
Reuse or Discharge of water	Dewatering activities (During Construction)	Implementation of requirements within Section 5.2 of SWMP, prior to any discharge off the premises or reuse within the premises.	Environmental Manager or Coordinator
Sediment and erosion control measures	Construction activities involving ground disturbance.	Sediment and Erosion Control Plan has been developed, reviewed, approved and implemented.	Environment Manager (or delegate)

Item	Process Held	Acceptance Criteria	Approval Authority
Vegetation removal	Commencement of site clearing or vegetation removal.	Pre-clearing surveys and inspections for endangered and threatened flora and fauna species have been undertaken by qualified ecologists.	Environment Manager (or delegate)
Vegetation removal	Commencement of site clearing or vegetation removal.	Clearing limits have been verified against the project approval environmental assessment, limits have been set-out and vegetation to be retained has been delineated and or protected. Tree Report has been completed and submitted to the DPE.	Environment Manager (or delegate)
Vegetation removal	Commencement of site clearing or vegetation removal.	Trained ecologist to be present during the clearing of native vegetation or removal of potential fauna habitat.	Environment Manager (or delegate)
Construction Methodologies – direct delivery and subcontract works.	Construction process representing potential medium or high impact to the environment.	Construction methodology / EWMS / Job Safety and Environmental Analysis (JSEA) have been reviewed by the Site Environmental Management Representative and addresses the relevant requirements of the CEMP procedures.	Project Engineer
OOHW Applications – individual works scenarios	Works to be performed outside of approved Construction hours (Pre-Construction and during Construction)	OOHW Protocol and Application Form and Community Notification EPL 12208	ER Endorsement and Approval TfNSW Approval (if OOHW are occurring under EPL 12208) EPA (Information to be provided on request)
Use of local roads by heavy vehicles	Use of local roads by heavy vehicles	Preparation of Road Dilapidation Report	Construction Manager (or delegate)
Dangerous Goods	Transport of dangerous goods	Verification that transport vehicles meet the requirements.	Construction Manager (or delegate)
Dangerous Goods	Storage of dangerous goods	Verification that bunded storage is provided and that segregation and separation distances are maintained for the storage area.	Construction Manager (or delegate)
Controlled/ Hazardous Waste	Transport of Controlled / Hazardous waste from the site	Verification that the waste has been classified in accordance with the EPA guidelines, transport licensing in place and landfill can lawfully receive the waste. Section 143 notice or equivalent from waste receiver has been received.	Construction Manager (or delegate)
Spoil Transport	Spoil import and removal	Verification that the spoil has been classified and the disposal location can lawfully receive the waste. Section 143 notice or equivalent from waste receiver has been received.	Construction Manager (or delegate) Environmental Manager (or delegate)

Item	Process Held	Acceptance Criteria	Approval Authority
		Imported material has classification reports or appropriate testing to demonstrate that it meets any EPA exemptions or has been classified as VENM/ENM.	
Encounter of Unexpected Heritage Item	Commencement of works in the affected area	The Unexpected Finds Process as outlined in the HMP and Sydney Metro Unexpected Finds Procedure must be applied in the event of encountering unexpected/potential heritage items.	Environmental Manager (or delegate)
Ancillary Facilities	Establishment of new ancillary facilities not identified in the planning approval documents	Demonstration that the ancillary facility meets the requirements of CoA A16. Where facilities don't meet the requirements of CoA A16, complying with the requirements of CoA A17. Endorsement by the ER for minor ancillary facilities in accordance with CoA A18.	DPE (outside rail corridor) ER
Pre-Construction compliance report	Construction works	Pre-Construction compliance report to be completed in accordance with CoA A31 and submitted to the DPE at least one month prior to the commencement of Construction.	DPE
Construction Monitoring Programs	Construction Works	Endorsement of the programs by the ER and submission to the DPE for approval at least one month prior to the commencement Construction Relevant baseline data for the specific Construction activity has been collected.	ER DPE

3.14. Restoration of sites

On completion of the works, any areas disturbed by Construction activities (such as areas for site compounds, material storage, access and haul roads and the provision of Downer's Project accommodation) will be reinstated and restored in accordance with consultation with Sydney Metro, the community and stakeholders. As a minimum, reinstatement will include the following:

- Downer will clear and clean all working areas and accesses at project completion;
- At the completion of Construction all plant, temporary buildings or vehicles not required for the subsequent stage of Construction will be removed from the site;
- All land, including roadways, footpaths, loading facilities or other land having been occupied temporarily will be returned to their pre-existing condition or better; and
- Reinstatement of community spaces, infrastructure and services will occur as soon as possible after completion of Construction.

3.15. Records of environmental activities

3.15.1. Environmental records

Downer's Environmental Manager is responsible for maintaining all environmental management documents and records as current at the point of use. In accordance with the CEMF, records will be maintained onsite for the duration of works. Types of documents and records include:

- All environmental monitoring, inspection and compliance reports/records;
- Environmental monitoring data;
- Documentation as required by performance conditions, approvals, licences and legislation;
- Reports on environmental incidents, other environmental non-compliances or non-conformances and follow-up action;
- Results of internal and external audits;
- Minutes of CEMP and Construction environmental management system review meetings and evidence of any action taken;
- Modifications to site environmental documentation;
- Induction and training records;
- Procedures and protocols;
- Checklists, forms and templates;
- Correspondence with public authorities;
- Complaints and enquiries received, and follow-up action;
- Notifications received by regulators;
- Community engagement information;
- CEMP and Sub-plans;
- EWMS; and
- Additional documents and requirements as identified in the CEMF, CoA and REMMs.

Records will be retained by Downer for a period of no less than seven years and will be made available in a timely manner to Sydney Metro (or their representative) upon request and will be managed in accordance with Downer EMS.

3.15.2. Document control

The Principal Contractor, the ER, and Sydney Metro where relevant, will coordinate the preparation, review and distribution, as appropriate, of the environmental documents and records listed above. During the Project, the environmental documents and records will be stored at each of the main site compounds.

The Principal Contractor will implement a Project document control management system to control the flow of documents within and between the Principal Contractor, Sydney Metro, stakeholders and subcontractors.

The process will also 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; and
- Archived.

A register and distribution list will identify the current revision of particular documents, records or data.

In accordance with Downer EMS, all project documents are generated, numbered, approved, revised, transmitted, and stored in accordance with the project's Document Control Plan.

The review of this document ensures the suitability, effectiveness, and adequacy of this document. This document is formally reviewed every 6 months (as a minimum) and whenever the plan, risk, and/ or activities change from the scope/ content.

The review is conducted by a review team comprising the Project Manager (or delegate) and the Environmental Advisor/ Project Environmental Manager (or Safety Manager) and considers performance against the requirements of this document with respect to incident trends and findings from internal and external audits.

The Project Manager (or delegate) ensures any changes to this document as a result of review/ change is communicated to personnel.

3.16. Management review

Downer will check the status and adequacy of the CEMP to ensure that it meets current requirements as well as relevant environmental standards.

The CEMP will be reviewed as and when required during the course of the contract when the following situations arise:

- Client (Sydney Metro) recommendations for changes;
- Changes to Downer's standard system;
- Opportunities for improvement or deficiencies in the project system are identified; and
- Following an audit of the system or the occurrence of significant incidents, non-conformances or non-compliances.

The routine management review will be undertaken at six monthly intervals.

In addition, Downer will ensure the continual review and improvement of the EMS. This will generally occur in response to:

- Issues raised during environmental surveillance and monitoring;
- Expanded scope of works;
- Environmental incidents; and/or

- Environmental non-conformances or non-compliances.

A formal review of the EMS by Downer's Senior Management Team will also occur on an annual basis, as a minimum. This review will generate actions for the continual improvement of the EMS and supporting management plans.

3.17. CEMP/Sub-plan revision and changes to the Project

3.17.1. CEMP revision

Continual improvement is achieved through regular measurement, evaluation, audit and review of the effectiveness of the CEMP, Project environmental outcomes and Downer's EMS. A review process ensures that environmental documentation is updated as appropriate for the specific works that are occurring on site. Reviews undertaken as described in Section 3.16 will provide specific opportunities to identify improvements in the environmental management system and/or this CEMP.

This CEMP, CEMP Sub-plans and Monitoring Programs will be updated as required:

- To consider changes to the environment or generally accepted environmental management practices, new risks to the environment, any hazardous substances, contamination or changes in law;
- In response to internal or external audits or six-monthly management plan reviews;
- Following reportable environmental incidents;
- Upon identification of new risks, including risks identified during risk register updates;
- When non-conformances or non-compliances are identified;
- Following environmental audits that identify matters that require attention;
- In response to Project change (including modifications);
- As part of a continuous improvement process; and
- Where requested or required by DPE or any other Authority.

Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of Downer's Environmental Manager or Environmental Advisors to prepare the revised documents.

This CEMP, and subsequent revisions, must be authorised by Downer's Environmental Manager. The ER can approve minor changes to the CEMP, where the ER is satisfied that the amendment to the CEMP is necessary. Minor changes as described in the CoA A26(i) would typically include those that:

- Are administrative in nature (e.g. staff and agency/authority name changes);
- Do not noticeably increase the magnitude of impacts on the environment when considered individually or cumulatively;
- Are in response to audit findings or periodic reviews; and
- Do not compromise the ability of the Project to meet legislative requirements and are consistent with terms of the approval and does not include any modifications to the terms of Project approval.

Where the ER deems it necessary, the amended CEMP will be forwarded to relevant stakeholders for review and comment if required and forwarded to the Planning Secretary for approval. All updates to the CEMP are to be communicated to Sydney Metro prior to finalisation and/or update of document.

Revised versions of the CEMP or Sub-plans will be made available and distributed to relevant stakeholders through the processes described in Section 3.15.2. Changes will also be communicated through toolbox talks to existing onsite personnel and incorporated into environmental induction materials.

3.17.2. Changes to the Project

Refinements to the Project may result from detailed design refinements or changed circumstances throughout Construction. In these instances, Downer's Environmental Manager will undertake a review of the refinement to confirm that it is covered by the Approval Documents. It may be the case that a Consistency Assessment in consultation with Sydney Metro will need to be undertaken to determine if a Project modification may be required following design changes or changes in scope (refer to Section 2.4).

Should the Consistency Assessment determine that a Project modification may be required (i.e. the impacts are of a nature and scale that it is not considered consistent with the Project approval), a modification application under Section 5.25(2) of the EP&A Act 1979 as prepared and lodged by Sydney Metro to the Planning Secretary for determination.

If required, the CEMP and Sub-plans would be updated as required to incorporate any additional potential environmental impacts or mitigation or management measures that resulted from the proposed changes. Affected personnel will be made aware of changes before the relevant works commence through toolbox talks, daily pre-start meeting, HSE committees or forums arranged to specifically address changes.

4. Environmental management documentation

CEMP Sub-plans, Monitoring Programs and Procedures support the Project’s CEMP and environmental management. These documents have been prepared to address the requirements of the CoA, REMM, CEMF and other measures identified in Section 1.2 and environment assessment documentation. The CEMP structure overview is shown in Figure 8 and key environmental management documents are discussed below.

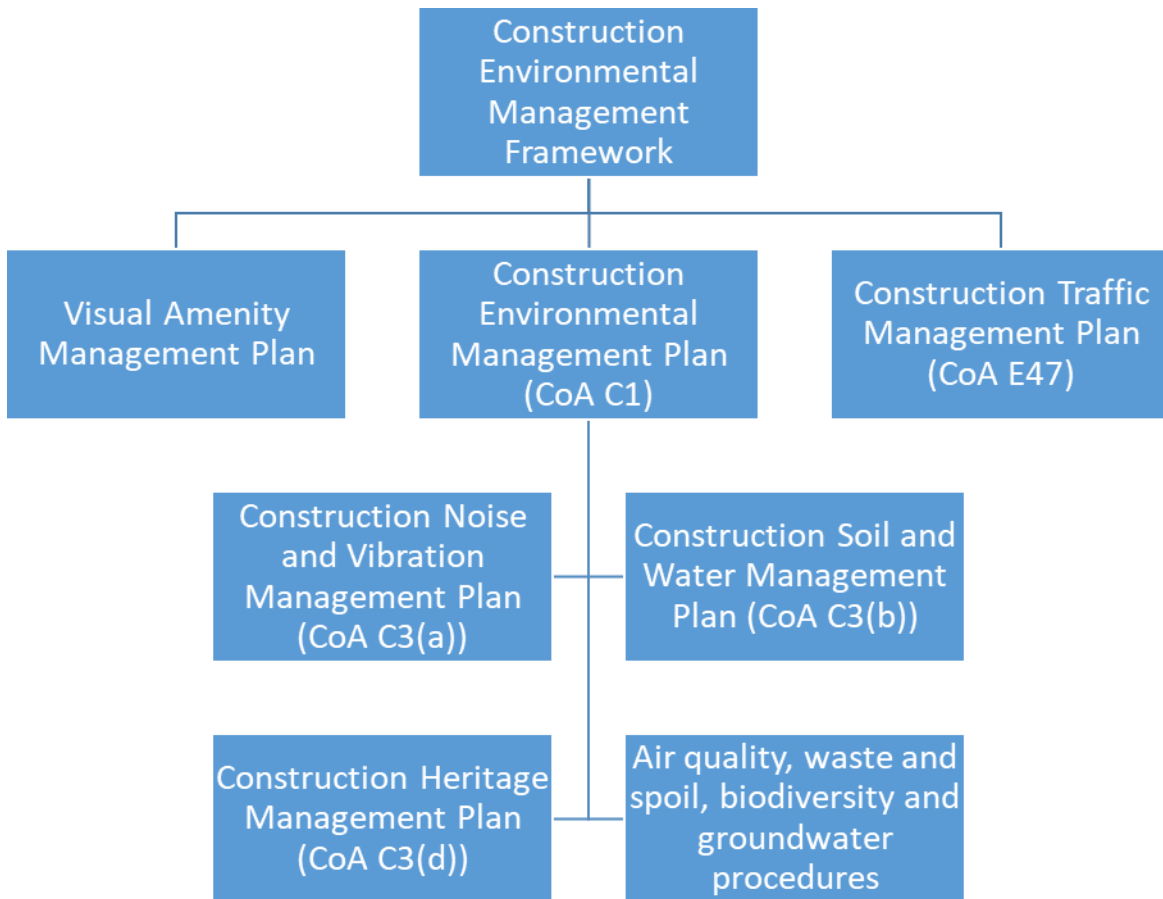


Figure 8 CEMP structure overview

4.1. Noise and vibration

A Noise and Vibration Management Plan (NVMP) has been developed to manage the noise and vibration risks during Construction of the Project. The NVMP is located in Appendix G of the CEMP and has been developed in accordance with CoA C3, C4, C5, C6 and C7.

For further Sub-plan specific CoA, REMM and other relevant requirements used to prepare the NVMP refer to Section 2 of the NVMP.

Furthermore, in accordance with the CoA C8(a) a Noise and Vibration Monitoring Program has been prepared and is included in Section 8 of the NVMP.

4.2. Soil and water

A Soil and Water Management Plan (SWMP) has been developed to manage soil and water quality risks during Construction of the Project. The SWMP is located in Appendix H of the CEMP and has been developed in accordance with CoA C3, C4, C5, C6 and C7.

For further Sub-plan specific CoA, REMM and other relevant requirements used to prepare the SWMP refer to Section 2.2 and Appendix A of the SWMP.

CoA C8(b) requires the preparation of a Water Quality Monitoring Program. Consistent with Section 3.3(b) of the CEMF, a Water Quality Monitoring Procedure has been prepared and is included in Section 6 of the SWMP.

4.3. Heritage

A Heritage Management Plan (HMP) has been developed to manage the risks from Construction of the Project. The HMP is located in Appendix I of the CEMP and has been developed in accordance with CoA C3, C4, C5, C6 and C7.

For further Sub-plan specific CoA, REMM and other relevant requirements used to prepare the HMP refer to Section 2.2 and Appendix A of the HMP.

4.4. Waste and spoil

CoA C3(c) required the preparation of a Waste and Spoil Management Plan. However, in accordance with the Sydney Metro City & Southwest - Sydenham to Bankstown Staging Report a Waste and Spoil Procedure has been prepared. Refer to Section 4.7 and Appendix E for further detail.

4.5. Visual Amenity

A Visual Amenity Management Plan (VAMP) will be prepared by the Principal Contractor to manage the visual amenity risks during Construction of the Project. The VAMP is a standalone document and has been developed in accordance with Section 3.4 of the CEMF.

4.6. Traffic

Construction Traffic Management Plan/s (CTMP/s) will be prepared by the Principal Contractor as per CoA E47. These are standalone documents and do not form part of the CEMP. The CTMP/s will be submitted to DPE for information following engagement with RMS and SCO.

4.7. Other aspects

Consistent with the Sydenham to Bankstown Staging Report and Sections 3.4 and 3.5 of the CEMF, procedures have been prepared for the following environmental aspects:

- Biodiversity;
- Groundwater;
- Air Quality; and
- Waste and Spoil.

These procedures are included in Appendix E.

4.8. Sustainability

A Sustainability Strategy for the Sydenham to Bankstown project has been prepared in accordance with CoA E43. The Sustainability Strategy is available on the Sydney Metro website <https://www.sydneymetro.info/documents>.

Appendix A: Compliance Matrix

Conditions of Approval compliance matrix

CoA	Condition requirements	Document reference
A16	<p>Ancillary facilities that are not identified by description and location in the documents listed Condition A1 can only be established and used in each case if:</p> <ul style="list-style-type: none"> a) they are located within the Construction boundary of the CSSI; and b) they are not located next to a sensitive receiver (including access roads) (unless landowners and occupiers have accepted in writing 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), and 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. 	Section 3.12.1
A17	<p>Ancillary facilities that are not identified by description and location in the documents listed in Condition A1 and do not meet the requirements of Condition A16, can only be established and used with the approval of the Planning Secretary except where they are located within the rail corridor, in which case they may be endorsed by the ER. A review of environmental impacts must be submitted with the request for Planning Secretary's approval or ER's endorsement.</p>	Section 3.12.1
A18	<p>The use of an ancillary facility for Construction must not commence until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition C3 and relevant Construction Monitoring Programs required by Condition C8 have been approved by the Planning Secretary.</p>	Section 3.12.1
A19	<p>Lunch sheds, office sheds, portable toilet facilities, and the like, that are not identified as an ancillary facility in the documents listed Condition A1, can be established where they satisfy the following criteria:</p> <ul style="list-style-type: none"> a) are located within the Construction boundary; and b) have been assessed by the ER to have - <ul style="list-style-type: none"> 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 ii. minor environmental impact with respect to waste management and flooding, and iii. no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval. 	Section 3.12.1
A20	<p>Boundary screening must be erected around all ancillary facilities that are adjacent to sensitive receivers for the duration of Construction of the CSSI unless otherwise agreed with relevant council(s), and affected residents, business operators or landowners.</p>	Section 3.12.2
A21	<p>Boundary screening required under Condition A20 of this approval must minimise visual, noise and air quality impacts on adjacent sensitive</p>	Section 3.12.2

CoA	Condition requirements	Document reference
	receivers.	
A22	Work must not commence until an ER has been approved by the Planning Secretary and engaged by the Proponent.	Section 3.3
A23	The Planning Secretary's approval of an ER must be sought no later than one (1) month before the commencement of Work.	Section 3.3
A24	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the EIS, SPIR or Submissions Report and is independent from the design and Construction personnel for the CSSI and those involved in the delivery of it.	Section 3.3
A26	<p>For the duration of the Work until the commencement of Operation, or as agreed with the Planning Secretary, the approved ER must:</p> <ul style="list-style-type: none"> a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; b) consider and inform the Planning Secretary on matters specified in the terms of this approval; 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; d) review documents identified in Conditions C1, C3 and C8 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"> 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 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 for information or are not required to be submitted to the Secretary); e) regularly monitor the implementation of the documents listed in Conditions C1, C3 and C8 to ensure implementation is being carried out in accordance with the document and the terms of this approval; f) as may be requested by the Planning Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A34 of this approval; g) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints; h) assess the impacts of minor ancillary facilities as required by Condition A19 of this approval; i) consider any minor amendments to be made to the documents listed in Conditions C1, C3 and C8 and any document that requires the approval of the Planning Secretary that comprise updating or are of an administrative or minor nature and are consistent with the terms of this approval and the documents listed in Conditions C1, C3 and C8 or other 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; and j) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report detailing the ER's actions and decisions on matters for which the ER was responsible in the preceding month. The k) Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI. 	Section 3.3
A29	Before the commencement of Construction, a Compliance Monitoring and Reporting Program must be prepared, endorsed by the ER and submitted to the Planning Secretary for information.	Section 3.9 and 0

CoA	Condition requirements	Document reference
A30	Compliance reports of the CSSI must be carried out for the duration of Construction and for a minimum of one (1) year following commencement of Operation. The Department must be notified of the commencement dates of Construction and Operation of the CSSI in the pre-Construction and pre-Operational compliance reports (respectively).	Section 3.9 and 0
A31	The Construction Compliance Report must provide details of any review of, and minor amendments made to, the CEMP (which must be approved by the ER), resulting from Construction carried out during the reporting period.	Section 3.9 and 0
A32	The Compliance Monitoring and Reporting Program in the form required under Condition A29 of this approval must be implemented for the duration of Construction and for a minimum of one (1) year following commencement of Operation, or for a longer period as determined by the Planning Secretary based on the outcomes of independent audits, Environmental Representative Reports and regular compliance reviews submitted through Compliance Reports . If staged Operation is proposed, or Operation is commenced of part of the CSSI, the Compliance Monitoring and Reporting Program must be implemented for the relevant period of each stage or part of the CSSI.	Section 3.9 and 0
A33	No later than one (1) month before the commencement of Construction an Independent Audit Program prepared in accordance with AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems must be submitted to the Planning Secretary.	Section 3.9.3
A34	Independent audits of the CSSI must be carried out in accordance with: a) the Independent Audit Program submitted to the Planning Secretary under Condition A33 of this approval and Independent Audit Reports prepared.	Section 3.9.3
A35	The Proponent must: a) review and respond to each Independent Audit Report prepared under Condition A34 of this approval; and b) submit the response to the Planning Secretary within six (6) weeks of completing the audit.	Section 3.9.3
A36	The Department must be notified in writing to compliance@planning.nsw.gov.au 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.	Section 3.10.3
A37	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix A	Section 3.10.3
E2	In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during the Construction and Operation of the CSSI.	Appendix E – Procedure 3: Air Quality
E3	Where impacts to threatened ecological communities or endangered species cannot be avoided, they must be offset in accordance with the requirements of the NSW Biodiversity Offsets Policy for Major Projects (OEH, 2014) in agreement with OEH. <i>Note: the SPIR proposal does not require offsetting under the Framework for Biodiversity Assessment as it does not have any impacts to threatened ecological communities or threatened species.</i>	Appendix E – Procedure 1: Biodiversity
E4	The CSSI must be designed to retain as many trees as possible. Where trees are to be removed, the Proponent must provide a 2:1 ratio replacement of trees. Replacement trees must be planted within the project boundary or on public land up to 500 metres from the project boundary. Replacement tree plantings can be undertaken beyond 500 metres on public land within the local government areas to which the	Appendix E – Procedure 1:

CoA	Condition requirements	Document reference
	CSSI approval applies if requested by the relevant council(s) or where no more practicable land for planting can be found within and up to 500 metres from the CSSI boundary. The location of replacement trees must be determined in consultation with the relevant council(s).	Biodiversity
E5	<p>The Proponent must commission an independent experienced and suitably qualified arborist, to prepare a comprehensive Tree Report(s) before removing any trees as detailed in the documents listed in Condition A1. The Tree Report may be prepared for the entire CSSI or separate reports may be prepared for individual areas where trees are required to be removed. The report(s) must identify the impacts of the CSSI on trees and vegetation within and adjacent to the Construction footprint. The report(s) must include:</p> <ul style="list-style-type: none"> (a) assess compliance with the requirements of this approval; (b) a description of the conditions of the tree(s) and its amenity and visual value; (c) consideration of all options to avoid tree removal, including relocation of services, redesign or relocation of ancillary components (such as substations, fencing etc.) and reduction of standard offsets to underground services; and (d) measures to avoid the removal of trees or minimise damage to existing trees and ensure the health and stability of those trees to be protected. This includes details of any proposed canopy or root pruning, root protection zone, excavation, site controls on waste disposal, vehicular access, storage of materials and protection of public utilities. <p>A copy of the report(s) must be submitted to the Planning Secretary before the removal or pruning of any trees, including those affected by site establishment Work. All recommendations of the report must be implemented by the Proponent, unless otherwise agreed by the Planning Secretary.</p>	Appendix E – Procedure 1: Biodiversity
E6	<p>Replacement trees are to have a minimum pot size of 75 litres except where the plantings are consistent with the pot sizes specified in a relevant council’s plans / programs / strategies for vegetation management, street planting, or open space landscaping, or as agreed by the relevant council. In areas not subject to council plans / programs / strategies, pot sizes should be informed through consultation with the relevant council(s).</p> <p><i>Note: For the purposes of Conditions E5 and E6, consultation with relevant council(s) encompasses consultation undertaken with those councils on the Station Design and Precinct Plan required by Condition E56, and any agreements reached on replacement pot sizes during consultation.</i></p>	Appendix E – Procedure 1: Biodiversity
E54	The Proponent must construct and operate the CSSI 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 4282-1997 Control of the obtrusive effects of outdoor lighting</i> and relevant Australian Standards in the series <i>AS/NZ 1158 – Lighting for Roads and Public Spaces</i> .	Refer to VAMP Section 3.2.3
E73	<p>Any items or infrastructure that are salvageable must be identified in the relevant CEMP Sub- plan (Condition C3).</p> <p><i>Note: reuse of items may include signal boxes, indicators, ballast or other rail infrastructure. These items should be offered to Sydney Trains or reuse.</i></p>	Appendix E – Procedure 4: Waste and Spoil
E74	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, under the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions made under the regulation.	Appendix E – Procedure 4: Waste and Spoil

CoA	Condition requirements	Document reference
E75	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Appendix E – Procedure 4: Waste and Spoil
E76	All waste must be classified in accordance with the EPA’s Waste Classification Guidelines, with appropriate records and disposal docketts retained for audit purposes.	Appendix E – Procedure 4: Waste and Spoil

CEMF compliance matrix

Clause	Requirement	Document Reference
1.3	<p>Transport for NSW (TfNSW) has developed an Environment and Sustainability Policy (Appendix A) for Sydney Metro Delivery Office (SMDO). Principal Contractors will be required to undertake their works in accordance with this policy. The policy reflects a commitment in the delivery of the project to:</p> <ul style="list-style-type: none"> Align with, and support, Transport for NSW (TfNSW) Environment & Sustainability Policy. Optimise sustainability outcomes, transport service quality, and cost effectiveness. Develop effective and appropriate responses to the challenges of climate change, carbon management, resource and waste management, land use integration, customer and community expectation, and heritage and biodiversity conservation. Be environmentally responsible, by avoiding pollution, enhancing the natural environment and reducing the project ecological footprint, while complying with all applicable environmental laws, regulations and statutory obligations. Be socially responsible by delivering a workforce legacy which benefits individuals, communities, the project and industry, and is achieved through collaboration and partnerships. 	Section 1.3 Appendix D
2	<p>The key environmental obligations to be addressed are contained within:</p> <ul style="list-style-type: none"> Legislative requirements. Project approval documentation. Conditions of Approval. Environment Protection Licences. Other permits, approval and licences. Standards and guidelines. 	Section 2

Clause	Requirement	Document Reference
2.1	<p>Table 1.1 (of the CEMF) identifies key NSW environmental legislative requirements and their application to Sydney Metro C&SW construction works, current as at the date of this document. TfNSW and its Contractors should regularly review their legislative requirements.</p>	Section 2
2.2	<p>Sydney Metro Northwest is classified as Critical State Significant Infrastructure and was approved under the following in accordance with Section 115W of the Environmental Protection and Assessment Act 1997:</p> <ul style="list-style-type: none"> • Staged State Infrastructure Approval (1 October 2011, modified on 25 September 2012) • Stage 1 – Major Civil Construction Works (25 September 2012, modified on 18 April 2013) • Stage 2 – Stations, Rail Infrastructure and Systems (8 May 2013, modified on 20 May 2014). <p>Some components of Sydney Metro Northwest (such as the conversion of the Epping to Chatswood component of the project) have also been approved under Part 5 of the Environmental Protection and Assessment Act. in which case TfNSW is the consent authority.</p> <p>Sydney Metro City and Southwest is also classified as Critical State Significant Infrastructure and requires approval from a consent authority under the requirements of the Environmental Protection and Assessment Act 1997 (Section 115W). Two separate approvals will be sought:</p> <ul style="list-style-type: none"> • Sydney Metro City and Southwest – Chatswood to Sydenham • Sydney Metro City and Southwest - Sydenham to Bankstown <p>The requirements of the approval are required to be complied with by TfNSW. Responsibility for implementing mitigation measures and conditions of approval will be allocated between TfNSW and Principal Contractors as appropriate. Typically TfNSW will produce a Staging Report which sets out the applicability and allocation of approval requirements within the project’s program of works.</p>	Section 2 Appendix A
2.3	<p>Sydney Metro projects often meet the definition of a number of scheduled activities under Schedule 1 of the Protection of the Environment Operation Act 1997 (POEO Act) and as such our contractors may be required to obtain an Environment Protection Licence (EPL) or work under the existing EPL held by Sydney Trains.</p> <p>Where required, Sydney Metro Principal Contractors will:</p> <ol style="list-style-type: none"> a. Apply for and be granted an EPL from the EPA. b. Hold an EPL which covers their scope of works as necessary under the POEO Act. c. Undertake their scope of works in accordance with the conditions of the applicable EPLs as issued by the EPA. d. Work under the existing Sydney Trains EPL. 	Section 2.6
2.4	<p>Numerous environmental publications, standards, codes of practice and guidelines are relevant to TfNSW construction and are referenced throughout this Construction Environmental Management Framework. A summary of these applicable standards and guidelines is provided below:</p> <ul style="list-style-type: none"> • ISO14001 Environmental Management System – Requirements with Guidelines for Use 	Section 2.5

Clause	Requirement	Document Reference
	<ul style="list-style-type: none"> Interim Construction Noise Guidelines (Department of Environment and Climate Change, 2009) Managing Urban Stormwater: Soil and Construction (Landcom, 2008) AS4282:1997 Control of the Obtrusive Effect of Outdoor Lighting Waste Classification Guidelines (Department of Environment, Climate Change and Water, 2008) AS 1742.3 Manual of uniform traffic control devices Part 3: Traffic control for works on roads RMS Traffic Control at Worksites Manual Australian and New Zealand Guidelines for Fresh and Marine Water Quality 	
3.1(a)	Principal Contractors are required to have a corporate Environmental Management System certified under AS/NZS ISO 14001:2004 and to have transitioned this accreditation into AS/NZS ISO 14001:2015 by September 2018.	This plan
3.1(b)	<p>Principal Contractors are required to develop a project based Environment and Sustainability Management System (E&SMS).</p> <p>The E&SMS will:</p> <ul style="list-style-type: none"> (i) Be consistent with the Principal Contractors corporate Environmental Management System and AS/NZS ISO 14001:2004 or 2015; (ii) Be supported by a process for identifying and responding to changing legislative or other requirements; (iii) Include processes for assessing design or construction methodology changes for consistency against the planning approvals; (iv) Include processes for tracking and reporting performance against sustainability and compliance targets; (v) Include a procedure for the identification and management of project specific environmental risks and appropriate control measures; and (vi) Be consistent with the Sydney Metro C&SW Sustainability Strategy and Sydney Metro Environment and Sustainability Policy 	This plan
3.1(c)	All sub-contractors engaged by the Principal Contractor will be required to work under the Principal Contractor’s E&SMS.	Section 3.4
3.1(d)	The relationship between key documents within the Sydney Metro Environment and Sustainability Management System and the Principal Contractor’s Environment and Sustainability Management System is shown in Figure 2 (of the CEMF).	This Plan
3.1(e)	The Principal Contractors Sustainability Plan and its Sub-plans will capture governance and design requirements as well as social sustainability initiatives as required by the Sydney Metro Sustainability Strategies.	Refer to Sustainability Management Plan
3.1(f)	These plans vary in scope across different delivery packages.	Noted

Clause	Requirement	Document Reference
3.4(a)	<p>Subject to Section 3.3(b) and Section 3.2(b) the Principal Contractor will prepare issue-specific environmental Sub-plans to the CEMP and SMP which address each of the relevant environmental impacts at a particular site or stage of the project.</p> <p>Issue specific Sub-plans will include:</p> <ul style="list-style-type: none"> (i) Spoil management; (ii) Groundwater management; (iii) Traffic and transport; (iv) Noise and vibration management; (v) Heritage management; (vi) Flora and fauna management; (vii) Visual amenity management; (viii) Carbon and energy management; (ix) Materials management; (x) Soil and water management; (xi) Air quality management; and (xii) Waste management and recycling. 	Refer to Section 1.2 and Staging Report
3.5(a)	<p>The Principal Contractor will prepare and implement activity specific environmental procedures. These procedures should support environmental management Sub-plans, but may substitute for Sub-plans in agreement with TfNSW if a reasonable risk based justification can be made and the sub plan is not a requirement of any approval.</p>	Appendix E
3.5(b)	<p>The procedures will include;</p> <ul style="list-style-type: none"> (i) A breakdown of the work tasks relevant to the specific activity and indicate responsibility for each task; (ii) Potential impacts associated with each task; (iii) A risk rating for each of the identified potential impacts; (iv) Mitigation measures relevant to each of the work tasks; and (v) Responsibility to ensure the implementation of the mitigation measures 	Appendix E
3.5(c)	<p>The Principal Contractor will prepare and implement site based progressive Environmental Control Maps (ECM's) which as a minimum:</p> <ul style="list-style-type: none"> (i) Is a progressive document depicting a current representation of the site; 	Section 3.2.3

Clause	Requirement	Document Reference
	(ii) Indicates which environmental procedures, environmental approvals, or licences are applicable; (iii) Illustrates the site showing significant structures, work areas and boundaries; (iv) Illustrates environmental control measures and environmentally sensitive receivers; (v) Is endorsed by the Principal Contractors Environmental Manager or delegate; and (vi) Relevant workers will be trained in the requirements of and will sign off the procedures prior to commencing works on the specific site and / or activity.	
3.6(a)	Where the requirement for an additional environmental assessment is identified, this will be undertaken prior to undertaking any physical works. The environmental assessment will include: (i) A description of the existing surrounding environment; (ii) Details of the ancillary works and construction activities required to be carried out including the hours of works; (iii) An assessment of the environmental impacts of the works, including, but not necessarily limited to, traffic, noise and vibration, air quality, soil and water, ecology and heritage; (iv) Details of mitigation measures and monitoring specific to the works that would be implemented to minimise environmental impacts; and (v) Identification of the timing for completion of the construction works, and how the sites would be reinstated (including any necessary rehabilitation).	Section 2.4
3.7(a)	Prior to the commencement of construction the Principal Contractors will offer Pre-construction Building Condition Surveys, in writing, to the owners of buildings where there is a potential for construction activities to cause cosmetic or structural damage. If accepted, the Principal Contractor will produce a comprehensive written and photographic condition report produced by an appropriate professional prior to relevant works commencing.	Refer to Construction Noise and Vibration Management Plan.
3.7 (b)	Prior to the commencement of construction the Principal Contractor will prepare a Road Dilapidation Report for all local public roads proposed to be used by heavy vehicles.	Refer to Construction Traffic Management Plan
3.8(a)	Principal Contractors will identify hold points, beyond which approval is required to proceed with a certain activity. Example activities include vegetation removal and water discharge. Hold points will be documented in relevant CEMPs.	Section 3.13
3.8(b)	Table 1.4 (of the CEMF) provides the structure for the register of hold points as well as a preliminary list of hold points which will be implemented.	Section 3.13
3.9(a)	Principal Contractors will be responsible for determining the training needs of their personnel. As a minimum this will include site induction, regular toolbox talks and topic specific environmental training as follows: i. The site induction will be provided to all site personnel and will include, as a minimum: <ul style="list-style-type: none"> • Training purpose, objectives and key issues; • Contractor’s environmental policy and key performance indicators; 	Section 3.5

Clause	Requirement	Document Reference
	<ul style="list-style-type: none"> • Due diligence, duty of care and responsibilities; • Relevant conditions of any environmental licence and/or the relevant conditions of approval; • Site specific issues and controls including those described in the environmental procedures; • Reporting procedure for environmental hazards and incidents; • Communication protocols. <p>ii. Toolbox talks will be held on a regular basis in order to provide a project or site wide update, including any key or recurring environmental issues; and</p> <p>iii. Topic specific environmental training, e.g. erosion and sediment control training will be undertaken for relevant site personnel as determined by the Principal Contractor</p>	
3.9(b)	<p>Principal Contractors will conduct a Training Needs Analysis which:</p> <ul style="list-style-type: none"> i. Identifies that all staff are to receive an environmental induction and undertake environmental incident management training ii. Identifies the competency requirements of staff that hold environmental roles and responsibilities documented within the Construction Environmental Management Plan and Sub-plans iii. Identifies appropriate training courses/events and the frequency of training to achieve and/or maintain these competency requirements iv. Implements and documents as part of the CEMP a training schedule that plans attendance at environmental training events, provides mechanisms to notify staff of their training requirements, and identifies staff who do not attend scheduled training events or who have overdue training requirements 	Section 3.5
3.10(a)	<p>Principal Contractors will develop and implement a Pollution Incident Response Management Plan, in accordance with the requirements of the POEO Act. Contractors' emergency and incident response procedures will also be consistent with any relevant SMDO procedures and will include:</p> <ul style="list-style-type: none"> i. Categories for environmental emergencies and incidents ii. Notification protocols for each category of environmental emergency or incident, including notification of TfNSW and notification to owners / occupiers in the vicinity of the incident. This is to include relevant contact details iii. Identification of personnel who have the authority to take immediate action to shut down any activity, or to affect any environmental control measure (including as directed by an authorised officer of the EPA) iv. A process for undertaking appropriate levels of investigation for all incidents and the identification, implementation and assessment of corrective and preventative actions; and v. Notification protocols of incidents to the EPA, DPE or OEH that are made by the Contractor or TfNSW. 	Sections 0
3.10(b)	The Contractor will make all personnel aware of the plan and their responsibilities.	Section 3.3
3.11(a)	Independent Environmental Representatives	Section 3.3

Clause	Requirement	Document Reference
	<p>a. TfNSW will engage Independent Environmental Representatives (ERs) to undertake the following, along with any additional roles as required:</p> <ul style="list-style-type: none"> i. Review, provide comment on and endorse (where required) any relevant environmental documentation to verify it is prepared in accordance with relevant environmental legislation, planning approval conditions, relevant standards and this CEMF. ii. Monitor and report on the implementation and performance of the above mentioned documentation and other relevant documentation. iii. Provide independent guidance and advice to TfNSW and the Contractors in relation to environmental compliance issues and the interpretation of planning approval conditions. iv. Be the principal point of advice for the DPE in relation to all questions and complaints concerning the environmental performance of the project. v. Ensure that environmental auditing is undertaken in accordance with all relevant project requirements. vi. Recommend reasonable steps, including ‘stop works’, to be taken to avoid or minimise adverse environmental impacts. 	
3.12(a)	<p>In relation to Roles and Responsibilities the CEMP will:</p> <ul style="list-style-type: none"> i. Describe the relationship between the Principal Contractor, TfNSW, key regulatory stakeholders, the independent environmental representative and the independent certifier ii. For each role that has environmental accountabilities or responsibilities, including key personnel, provide a tabulated description of the authority and roles of key personnel, lines of responsibility and communication, minimum skill level requirements and their interface with the overall project organisation structure iii. Provide details of each specialist environment, sustainability or planning consultant who is employed by the Principal Contractor including the scope of their work iv. Provide an overview of the role and responsibilities of the Independent Environmental Representative, the Independent Certifier and other regulatory stakeholders. 	Section 3.3
3.12(b)	All sub-contractors engaged by the Principal Contractor will be required to operate within the EMS documentation of that Principal Contractor	Section 3.4
3.13(a)	Issue specific environmental monitoring will be undertaken as required or as additionally required by approval, permit or licence conditions	Refer to relevant Sub-plans
3.13(b)	The results of any monitoring undertaken as a requirement of the EPL will be published on the Principal Contractor’s, or a project specific, website within 14 days of obtaining the results	Section 2.6
3.13(c)	<p>Environmental inspections will include:</p> <ul style="list-style-type: none"> i. Surveillance of environmental mitigation measures by the Site Foreman. 	Section 3.9.1

Clause	Requirement	Document Reference
	<ul style="list-style-type: none"> ii. Periodic inspections by the Principal Contractor’s Environmental Manager (or delegate) to verify the adequacy of all environmental mitigation measures. This will be documented in a formal inspection record. 	
3.13(d)	Regular site inspections by the ERs and TfNSW representatives at a frequency to be agreed with the Principal Contractor	Section 3.9.1
3.13(e)	<p>Principal Contractors will be required to undertake internal environmental audits. Internal audits will include:</p> <ul style="list-style-type: none"> i. Compliance with approval, permit and licence conditions. ii. Compliance with the E&SMS, CEMP, SMP, Sub-plans and procedures. iii. Community consultation and complaint response. iv. Environmental training records. v. Environmental monitoring and inspection results 	Section 3.9.3
3.13(f)	TfNSW (or an independent environmental auditor) will also undertake periodic audits of the Principal Contractor’s E&SMS and compliance with the environmental aspects of contract documentation, including this Construction Environmental Management Framework.	Section 3.9.3
3.14(a)	<p>Environmental Non-compliances</p> <p>Principal Contractors will document and detail any non-compliances arising out of the above monitoring, inspections and audits. TfNSW will be made aware of all non-compliances in a timely manner</p>	Section 0
3.14(b)	Principal Contractors will develop and implement corrective actions to rectify the non-compliances and preventative actions in order to prevent the re-occurrence of the non-compliance. Contractors will also maintain a register non compliances, corrective actions and preventative actions	Section 0
3.14(c)	TfNSW or the Environmental Representative may raise non-compliances against environmental requirements.	Noted
3.15(a)	<p>Principal Contractors will maintain appropriate records of the following:</p> <ul style="list-style-type: none"> i. Site inspections, audits, monitoring, reviews or remedial actions. ii. Documentation as required by performance conditions, approvals, licences and legislation. iii. Modifications to site environmental documentation (e.g. CEMP, Sub-plans and procedures). iv. Other records as required by this Construction Environmental Management Framework 	Section 3.15
3.15(b)	Records will be retained onsite for the duration of works	Section 3.15
3.15(c)	Additionally records will be retained by the Principal Contractor for a period of no less than 7 years in total. Records will be made available in a timely manner to TfNSW (or their representative) upon request	Section 3.15

Clause	Requirement	Document Reference
3.15(d)	Compliance reports detailing the outcome of any environmental surveillance activity including internal and external audits (refer to Section 3.13) will be produced by the Principal Contractors Environmental Manager or delegate. These reports will be submitted to TfNSW at an agreed frequency	Section 3.9.4
3.16(a)	Principal Contractors will ensure the continual review and improvement of the E&SMS. This will generally occur in response to: <ul style="list-style-type: none"> i. Issues raised during environmental surveillance and monitoring ii. Expanded scope of works iii. Environmental incidents iv. Environmental non-conformances. 	Section 3.16 and 3.17
3.16(b)	A formal review of the E&SMS by the Principal Contractor’s Senior Management Team will also occur on an annual basis, as a minimum. This review will generate actions for the continual improvement of the E&SMS and supporting management plans.	Section 3.16
5.1(a)	Standard working hours are between 7am – 6pm on weekdays and 8am – 1pm on Saturdays.	Section 3.6 Noise and Vibration Management Plan
5.1(b)	Works which can be undertaken outside of standard construction hours without any further approval include: <ul style="list-style-type: none"> i. Those which have been described in respective environmental assessments as being required to take place 24/7. For example, tunnelling and underground excavations and supporting activities will be required 24/7 ii. Works which are determined to comply with the relevant Noise Management Level at sensitive receivers iii. The delivery of materials outside of approved hours as required by the Police or other authorities (including RMS) for safety reasons iv. Where it is required to avoid the loss of lives, property and / or to prevent environmental harm in an emergency v. Where written agreement is reached with all affected receivers. 	Section 3.6 Noise and Vibration Management Plan
5.1(c)	Principal Contractors may apply for EPA approval to undertake works outside of normal working hours under their respective Environment Protection Licences	Noise and Vibration Management Plan
5.2(a)	Principal Contractors will consider the following in the layout of construction sites: <ul style="list-style-type: none"> i. The location of noise intensive works and 24 hour activities in relation to noise sensitive receivers ii. The location of site access and egress points in relation to noise and light sensitive receivers, especially for sites proposed to be utilised 24 hours per day iii. The use of site buildings to shield noisy activities from receivers iv. The use of noise barriers and / or acoustic sheds where feasible and reasonable for sites proposed to be regularly used outside of daytime hours 	Noise and Vibration Management Plan

Clause	Requirement	Document Reference
	v. Aim to minimise the requirement for reversing, especially of heavy vehicles.	
5.3(a)	Mitigation measures for reinstatement will be produced in consultation with TfNSW, the community and stakeholders.	Section 3.14
5.3(b)	Mitigation measures required for reinstatement will be incorporated into the CEMP and will include as a minimum: <ul style="list-style-type: none"> i. Principal Contractors will clear and clean all working areas and accesses at project completion ii. At the completion of construction all plant, temporary buildings or vehicles not required for the subsequent stage of construction will be removed from the site iii. All land, including roadways, footpaths, loading facilities or other land having been occupied temporarily will be returned to their pre-existing condition or better iv. Reinstatement of community spaces, infrastructure and services will occur as soon as possible after completion of construction. 	Section 21
6.1 (a)	The following spoil management objectives will apply to the construction of the project: <ul style="list-style-type: none"> i. Minimise spoil generation where possible; ii. The project will mandate 100% reuse or recycling (on or off-site) of usable spoil; iii. Spoil will be managed with consideration to minimising adverse traffic and transport related issues; iv. Spoil will be managed to avoid contamination of land or water; v. Spoil will be managed with consideration of the impacts on residents and other sensitive receivers; and vi. Site contamination will be effectively managed to limit the potential risk to human health and the environment. 	Appendix E – Procedure 4: Waste and Spoil Appendix H – Soil and Water Management Plan
6.2 (a)	Principal Contractors will develop and implement a Spoil Management Plan for their scope of works. The Spoil Management Plan will include as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
6.3 (a)	Examples of spoil mitigation measures include: <ul style="list-style-type: none"> i. Implementing the spoil re-use hierarchy; ii. Handling spoil to minimise potential for air and water pollution; and iii. Minimise traffic impacts associated with spoil removal. 	Appendix E – Procedure 4: Waste and Spoil
7.1 (a)	The following groundwater management objectives will apply to construction: <ul style="list-style-type: none"> i. Reduce the potential for drawdown of surrounding groundwater resources; ii. Prevent the pollution of groundwater through appropriate controls; and iii. Reduce the potential impacts of groundwater dependent ecosystems. 	Appendix E – Procedure 2: Groundwater
7.2 (a)	The following content may be provided within other sub plans such as the Soil and Water Management Plan and the Flora and Fauna Management Plan	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.

Clause	Requirement	Document Reference
7.2 (b)	Principal Contractor's will develop and implement a Groundwater Management Plan for their scope of works. The Groundwater Management Plan include as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
7.3 (a)	Examples of groundwater mitigation measures include: <ul style="list-style-type: none"> i. Implementing all feasible and reasonable mitigation measures to limit groundwater inflows to stations and crossovers; and ii. Undertaking groundwater monitoring during construction (levels and quality) in areas identified as 'likely' and 'potential groundwater dependent ecosystems. 	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
11.1 (a)	The following flora and fauna objectives will apply to construction: <ul style="list-style-type: none"> i. Minimise impacts on flora and fauna; ii. Design waterway modifications and crossings to incorporate best practice principles; iii. Retain and enhance existing flora and fauna habitat wherever possible; and iv. Appropriately manage the spread of weeds and plant pathogens. 	Appendix E – Procedure 1: Biodiversity 11.1(a) ii. Is not relevant to this Project as no waterway modifications or crossings are proposed.
11.2 (a)	Principal Contractor's will develop and implement a Flora and Fauna Management Plan which will include as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
11.2 (b)	Principal Contractors would undertake the following ecological monitoring as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
11.2 (c)	The Principal Contractor's regular inspections will include a check on the ecological mitigation measures and project boundary fencing.	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
11.2 (d)	The following compliance records would be kept by the Principal Contractor: <ul style="list-style-type: none"> i. Records of pre-clearing inspections undertaken; ii. Records of the release of the pre-clearing hold point; and iii. Records of ecological inspections undertaken. 	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
11.3 (a)	Examples of flora and fauna mitigation measures include: <ul style="list-style-type: none"> i. Areas to be retained and adjacent habitat areas will be fenced off prior to works to prevent damage or accidental over clearing; ii. Clearing will follow a two-stage process as follows: <ul style="list-style-type: none"> - Non-habitat trees will be cleared first after sign-off of the pre-clearing inspection; and 	Appendix E – Procedure 1: Biodiversity

Clause	Requirement	Document Reference
	<ul style="list-style-type: none"> - Habitat trees will be cleared no sooner than 48 hours after non-habitat trees have been cleared. A suitably qualified ecologist will be present on site during the clearing of habitat trees. Felled habitat trees will be left on the ground for 24 hours or inspected by the ecologist prior to further processing. iii. Weed management is to be undertaken in areas affected by construction prior to any clearing works in accordance with the Noxious Weeds Act 1993. 	
16.1 (a)	<p>The following air quality management objectives will apply to construction:</p> <ul style="list-style-type: none"> i. Minimise gaseous and particulate pollutant emissions from construction activities as far as feasible and reasonable; and ii. Identify and control potential dust and air pollutant sources. 	Appendix E – Procedure 3: Air Quality
16.2 (a)	Principal Contractors will develop and implement an Air Quality Management Plan which will include, as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
16.2 (b)	Air quality and dust monitoring will involve the following as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
16.2 (c)	The following compliance records will be kept by the Principal Contractor: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
16.3 (a)	<p>Examples of air quality mitigation measures include:</p> <ul style="list-style-type: none"> i. Plant and equipment will be serviced and maintained in good working order to reduce unnecessary emissions from exhaust fumes; ii. Water suppression will be used for active earthwork areas, stockpiles, unsurfaced haul roads and loads of soil being transported to reduce wind-blown dust emissions; iii. Wheel-wash facilities or rumble grids will be provided and used near the site exit points, as appropriate; and iv. Dust extraction and filtration systems will be installed for tunnel excavation works and deep excavation with limited surface exposure. 	<p>Appendix E – Procedure 3: Air Quality</p> <p>16.3 (a) iv. Is not relevant to this Project as no tunnel excavation works, or deep excavations are proposed</p>
17.1 (a)	<p>The following waste objectives will apply to construction:</p> <ul style="list-style-type: none"> i. Minimise waste throughout the project life cycle; and ii. Waste management strategies will be implemented in accordance with the <i>Waste Avoidance and Resource Recovery Act 2001</i> management hierarchy as follows: <ul style="list-style-type: none"> - Avoidance of unnecessary resource consumption; - Resource recovery (including reuse, reprocessing, recycling and energy recovery); and - Disposal. 	Appendix E – Procedure 4: Waste and Spoil

Clause	Requirement	Document Reference
17.1 (b)	Targets for the recovery, recycling or reuse of construction waste, and beneficial reuse of spoil will be provided by the Principal Contractor.	Appendix E – Procedure 4: Waste and Spoil
17.2 (a)	Principal Contractors will develop and implement a Waste Management and Recycling Plan which will include as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
17.2 (b)	Principal Contractors will undertake the following waste monitoring as a minimum: [...]	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
17.2 (c)	Principal Contractors will report all necessary waste and purchasing information to TfNSW as required for TfNSW to fulfil their WRAPP reporting requirements.	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
17.2 (d)	Compliance records will be retained by the Principal Contractors in relation to waste management including records of inspections and waste dockets for all waste removed from the site.	As outlined in the Sydenham to Bankstown Staging Report (rev 4) this is not applicable to the Project.
17.3 (a)	<p>Examples of waste management and recycling mitigation measures include:</p> <ul style="list-style-type: none"> i. All waste materials removed from the sites will be directed to an appropriately licensed waste management facility; ii. The use of raw materials (noise hoarding, site fencing, etc...) will be reused or shared, between sites and between construction contractors where feasible and reasonable; and iii. Recyclable wastes, including paper at site offices, will be stored separately from other wastes. 	Appendix E – Procedure 4: Waste and Spoil

Revised Environmental Mitigation Measures compliance matrix

REMM No.	REMM Requirement	Timing	Document Reference
LV4	<p>The management of trees during detailed design and construction planning would be guided by the project’s Tree Management Strategy, which would be developed in consultation with councils and include consideration of relevant local plans and strategies. Where removal cannot be avoided, trees would be replaced in accordance with the Tree Management Strategy, including replacement of removed trees in a two for one ratio.</p> <p>Opportunities to retain and protect existing trees would be defined during detailed design and construction planning, in accordance with the project’s Tree Management Strategy. The design would aim to reduce tree removal to the extent practicable, particularly where they contribute to screening vegetation or landscape character.</p>	Design/pre-construction	Appendix E – Procedure 1: Biodiversity
LV12	<p>Trees to be retained would be protected prior to the commencement of construction in accordance with AS4970-2009 Protection of trees on development sites and the project’s Tree Management Strategy.</p> <p>Any tree pruning would be undertaken in accordance with the project’s Tree Management Strategy, guided by a tree report prepared by a qualified arborist.</p>	Construction	Appendix E – Procedure 1: Biodiversity
B1	<p>Detailed design and construction planning would avoid direct impacts to vegetation mapped as threatened ecological communities or native plant community types, specifically Downy Wattle Turpentine - Grey Ironbark open forest on shale, Degraded Turpentine - Grey Ironbark open forest on shale and Broad-leaved Ironbark – Grey Box.</p>	Design/pre-construction	Appendix E – Procedure 1: Biodiversity
B2	<p>Pre-clearing surveys and inspections for endangered and threatened flora and fauna species would be undertaken by qualified ecologists prior to any clearing occurring. The surveys and inspections, and any subsequent relocation of species, would be undertaken in accordance with the measures provided in the biodiversity assessment report.</p>	Design/pre-construction	Appendix E – Procedure 1: Biodiversity
B3	<p>Areas of biodiversity value outside the project area would be marked on plans, and fenced or signposted where practicable, to prevent unnecessary disturbance.</p>	Construction	Appendix E – Procedure 1: Biodiversity

REMM No.	REMM Requirement	Timing	Document Reference
B4	Impacts to Downy Wattle Turpentine - Grey Ironbark open forest on shale, Degraded Turpentine - Grey Ironbark open forest on shale and Broad-leaved Ironbark – Grey Box would be avoided. The locations of these species and communities would be marked on plans, fenced on site, and avoided.	Construction	Appendix E – Procedure 1: Biodiversity
B5	Equipment storage and stockpiling would be restricted to identified compound sites and already cleared land.	Construction	Appendix E – Procedure 1: Biodiversity
B6	A trained ecologist would be present during the clearing of native vegetation or removal of potential fauna habitat to avoid impacts on resident fauna and to salvage habitat resources as far as is practicable.	Construction	Appendix E – Procedure 1: Biodiversity
B7	Priority weeds would be managed in accordance with the Biosecurity Act 2015. Weeds of national environmental significance would be managed in accordance with the Weeds of National Significance Weed Management Guide.	Construction	Appendix E – Procedure 1: Biodiversity

Appendix B: Legal and Other Requirements

Legal requirements

Legal and Other Requirements	Summary of Obligations	Relevance to the Project / Notes and System
Commonwealth requirements		
<i>Environment Protection and Biodiversity Conservation Act, 1999</i>	National environment law that provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places, defined in the Act as matters of national environmental significance.	No Relevance The Project would not impact on any matters of national environmental significance or Commonwealth land
<i>National Greenhouse and Energy Reporting Act 2007</i>	Corporations emitting more than 50kT of carbon dioxide equivalent units are required to register and report their Scope 1 and Scope 2 emissions for all Facilities in which they have Operational Control. Facilities emitting more than 25kT of carbon dioxide equivalent units must register and report Scope 1 and Scope 2 emissions.	High Relevance Where the Principal Contractor has Operational Control, the Scope 1 and Scope 2 emissions associated with the project must be reported. This includes the collation and reporting of subcontractors site emissions.
<i>Ozone Protection Act 1989</i>	This Act provides for a system of controls and to regulate and prohibit the manufacture, sale, distribution, use, emission, re-cycling & disposal of stratospheric ozone depleting substances and articles that contain these substances. The impact is that appropriately qualified people in accordance with this Act must undertake all servicing and maintenance of this type of equipment.	Low Relevance The relevance of this Act will relate to the use of refrigerators and air conditioning units in site buildings and vehicles which still contain CFCs. Such items are unlikely to be found on site.
NSW requirements		
<i>Biodiversity Conservation Act 2016</i>	The <i>Biodiversity Conservation Act 2016</i> provides provision for listing of species and ecological communities in NSW, protection of animals and plants, private land conservation agreements, the biodiversity offsetting scheme, Biodiversity Assessment under the EP&A Act 1979, biodiversity certification of land, public consultation on biodiversity matters, the functions of the Biodiversity Conservation Trust, regulatory compliance mechanisms, investigative powers and criminal proceedings under the Act.	Medium Relevance SSI projects are exempt for regulatory compliance mechanisms set out under Part 11 of the <i>Biodiversity Conservation Act</i> . Species listed within the act are recognised and are to be protected.
<i>Biosecurity Act 2015</i>	This Act relates to diseases and pests that may cause harm to human, animal or plant health or the environment, and for related purposes. Declared weeds	Low Relevance

Legal and Other Requirements	Summary of Obligations	Relevance to the Project / Notes and System
Biosecurity Regulation 2017	are listed in Schedule 8 of the Biosecurity Regulation 2017. This act repeals the <i>Noxious Weeds Act 1993</i> .	The Act relates to the management of vegetation during and removal activities and the duty to notify should certain pests and diseases be identified. No such species have been identified on the Project's works sites.
Contaminated Land Management Act 1997	This Act provides for a process to investigate and remediate land that has been contaminated and presents a significant risk of harm to human health. Section 60 of the Act is a "Duty to Report Contamination". This duty applies to owners of land and persons who become aware their activities have contaminated the land.	Medium Relevance The relevance of this Act to the Principal Contractor will be in the event suspected or potentially contaminated ground is found during Construction activities.
Dangerous Goods (Road and Rail Transport) Act 2008	The purpose of this Act is to regulate the transport of Dangerous Goods by road and rail in order to promote public safety and protect property and the environment. The transport of Dangerous Goods is required to be appropriately licensed (both vehicle and driver). Depending on the quantities being transported, the Act outlines specific requirements for including appropriate placards on the transport vehicle, emergency procedures, Personal Protective Equipment, manifest documentation and fire extinguishers.	High Relevance The relevance of the Act is in respect to the transport of dangerous good to & from the site. The project will require the use of a variety of dangerous goods. The Principal Contractor will need to review and ensure Dangerous Goods requirements are addressed where transported by its vehicles, plant and equipment.
Environmentally Hazardous Chemicals Act 1985	This Act prohibits the manufacturing, processing, keeping, distributing, conveying, using, selling or disposing of an environmental hazardous chemical or waste (prescribed activity) except under the provisions of a chemical control or a licence. The EPA is required to prepare inventories of environmentally hazardous chemicals and declared chemical wastes.	Low Relevance It is not anticipated any environmentally hazardous chemicals or declared chemical waste will be used or stored on site. The Act therefore has little relevance to the sites other than being aware of the existence of registers of declared chemical wastes and environmentally hazardous chemicals.
Environmental Planning and Assessment Act 1979	This Act establishes a system of environmental planning and assessment of development proposals in NSW.	High Relevance The Project has been declared Critical State Significant Infrastructure (CSSI) by virtue of Schedule 5, clause 4 of <i>State Environmental Planning Policy (State and Regional Development) 2011</i> . The development consent conditions and obligations are incorporated into the CEMP.
Fisheries Management Act 1994	This Act is applicable to all waters within the state including private and public waters and all permanent and intermittent waters. The Act is most relevant in respect to maintaining water quality and ensuring no polluted water from site	Low Relevance Along with the POEO Act water discharging from the site must not pollute the adjacent streams or watercourses. Projects

Legal and Other Requirements	Summary of Obligations	Relevance to the Project / Notes and System
	works enters streams, creeks and waterways. In addition, this Act also has relevance for the removal of marine vegetation.	assessed under Division 5.2 of the EP&A Act are exempt from permits required under sections 201, 205 or 219.
Heritage Act 1977	<p>This Act provides for the preservation and conservation of heritage items such as building, works, relic, places of historic interest, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance.</p> <p>Under this Act a relic means any deposit, object or material evidence which is 50 or more years old and relates to the settlement of the area (not being an aboriginal settlement). It is an offence under this Act to wilfully and knowingly damage or destroy items of heritage value.</p> <p>Do not demolish damage, move or develop around any place, building, work, relic, moveable object, precinct, or land that is the subject of an interim heritage order or listing on the State Heritage Register or heritage listing in a Local Environmental Plan without an approval from the Heritage Council (NSW) or local council.</p>	<p>Low Relevance</p> <p>Works will not occur within a State Heritage Register item. Regardless, projects assessed under Division 5.2 of the EP&A Act are exempt from approvals required under Part 4 and permits required under section 139 of the <i>Heritage Act</i>.</p>
National Parks and Wildlife Act 1974	<p>The relevance of this Act is firstly in respect to the protection and preservation of Aboriginal artefacts. Discovery of material on site suspected as being of Aboriginal origin must be reported and protected pending assessment and direction by the Client's Representative.</p> <p>Secondly it is an offence under Part 8A of this Act to pick or harm threatened species.</p>	<p>Low Relevance</p> <p>No identified Aboriginal artefacts have been identified within the Project's Construction area. Projects assessed under Division 5.2 of the EP&A Act are exempt from obtaining an Aboriginal Heritage Impact Permit required under section 90.</p>
Pesticides Act 1999 Pesticides Regulation 1995	<p>This Act and Regulation establish a legislative framework to regulate the use of pesticides. They have the objective to promote the protection of human health, the environment, property and trade in relation to pesticides. It is an offence under this Act and Regulation to wilfully or negligently misuse pesticides.</p>	<p>Low Relevance</p> <p>It is not envisaged that pesticides will be used on the project by the Principal Contractor.</p>
Protection of the Environment Operations Act 1997	<p>This Act is of most relevance to work being carried out under this contract. It integrates into one Act all the controls necessary to regulate pollution and reduce degradation of the environment, provides for licensing of scheduled development work, scheduled activities and for offences and prosecution under this Act.</p>	<p>High Relevance</p> <p>The POEO Act provides for the issuing of environmental protection notices to control work and activities not covered by licences.</p> <p>Section 148 of the Act requires a pollution incident causing or threatening material harm to the environment to be notified to the EPA and other authorities immediately.</p>

Legal and Other Requirements	Summary of Obligations	Relevance to the Project / Notes and System
		<p>Sydney Metro's Principal Contractor may choose to apply for an EPL from NSW EPA. If an EPL is granted for this Project, then this CEMP and Sub-plans would be revised to reflect the EPL's requirements.</p> <p>Project activities may be carried out under the Sydney Trains EPL 12208, where they are required as part of a Sydney Trains rail possession.</p>
<p>Roads Act 1993</p>	<p>This Act and associated Regulation primarily provide for such things as the opening and closing of public roads, identification of road boundaries and road widening, road levels, classification of public roads, road work, protection of public road and regulation of traffic, regulation of work, structures and activities.</p>	<p>Medium Relevance</p> <p>This act governs Road Occupancy Licences (ROL) that will be required for works on and round roads. An ROL cannot be refused to carry out works required under an SSI approval as per Section 115ZH of the EP&A Act.</p>
<p>Rural Fires Act 1997</p>	<p>This Act is intended to prevent, mitigate and suppress bush and other fires. It places a duty on the Principal Contractor as the occupier of the site to extinguish fires during bush fire danger periods or if unable to do so notify appropriate firefighting authorities of the existence of the fire and its location.</p>	<p>Low Relevance</p> <p>The Project's work sites, and surrounding areas are not prone to bush fires.</p>
<p>Sydney Water Act 1994 Sydney Water Regulation 1994</p>	<p>This Act and Regulation establishes the Sydney Water Corporation as a statutory State owned corporation. The functions of the Sydney Water Corporation is to supply and store water, provide sewerage services, provide stormwater drainage and dispose of waste water within its area of operations.</p>	<p>High Relevance</p> <p>Coordination will be required with Sydney Water during the works.</p>
<p>Waste Avoidance and Resource Recovery Act 2001</p>	<p>This Act repeals the <i>Waste Minimisation and Management Act 1995</i>. The purpose of the Act is to encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecological sustainable development. The Act provides for the making of policies and strategies to achieve these ends. It is an offence under the <i>Protection of the Environment Operations Act</i> to wilfully or negligently dispose of waste in a manner that harms or is likely to harm the environment.</p>	<p>High Relevance</p> <p>The relevance of the Act to this project is to implement the strategies by adopting the hierarchy of avoidance; avoidance of unnecessary resource consumption; resource recovery (including reuse, reprocessing, recycling and energy recovery), disposal (as a last resort).</p>
<p>Water Act 1912</p>	<p>This Act provides for licences to extract water for Construction purposes either from surface or artesian sources. Should Construction water be extracted from surface (other than sedimentation ponds) or artesian sources a licence will be required.</p>	<p>Low Relevance</p> <p>It is not proposed that Construction water will be obtained from surface (e.g. creeks, lakes etc.) or artesian sources.</p>
<p>Water Management Act 2000</p>	<p>This Act repeals the Rivers and Foreshores Improvement Act, 1948 and the Water Act, 1912. The provisions of both the aforesaid Acts are progressively</p>	<p>No Relevance</p>

Legal and Other Requirements	Summary of Obligations	Relevance to the Project / Notes and System
Water Management (General) Regulation 2004	rescinded as Water Management Plans are prepared and gazetted for catchment areas within the state. This Act and Regulation provide for the protection, conservation and ecologically sustainable development of water sources of the State and in particular to protect, enhance and restore water sources and their associated ecosystems.	Projects assessed under Division 5.2 of the EP&A Act are exempt from obtaining water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91.

Other requirements

Approval / Licence	Requirement	Relevant section of CEMP
EPL	Required for activities listed in Schedule 1 of the POEO Act	Section 2.6
Section 143 notice of POEO Act	Prior to transportation of waste to receiving facility	Appendix E - Procedure 4: Waste and Spoil
Road Occupancy Licences	Prior to commencement of traffic related works that require access to roads	Section 2.2 and Appendix B

Appendix C: Risk Assessment

This appendix includes an indicative risk assessment for the Project. Downer is responsible for revising this risk assessment to adequately reflect any changes to their scope of works and/or methodologies and to conform to their EMS.

All indicative environmental issues have been assessed in accordance with the table below:

Risk Assessment Rankings:

- >31 Very High;
- 22 to 30 High;
- 11 to 21 Medium; and
- 1 to 10 Low.

Risks will be reassessed by Downer following the consideration of control measures. Downer will be responsible for nominating an owner for the implementation of management measures.

Issues or activities that represent a Very High risk after the application of control measures are not to be undertaken.

The risk assessment process and its review were conducted at Project start-up phase (CEMP initial approval - February 2021). The risks were reassessed following a major change in scope following the completion of a significant portion of platform demolition and re-build. This reassessment of the risks was conducted in September 2022. The outcomes of the updated risk assessment are as below. The risks are reassessed at each updated to the CEMP or following any significant change in scope (whichever comes sooner).

IDENTIFICATION						ASSESSMENT OF CONTROLS				
No	ACTIVITY	ENVIRONMENTAL ASPECTS	ENVIRONMENTAL IMPACTS	RISK RATING			CONTROLS Note: Controls in Planning conditions and approved CEMP & Sub-plans prevail to the extent of any inconsistency with those below.	RESIDUAL RISK		
				RISK Assessment (current)				FINAL RISK Assessment (current)		
				Likelihood	Consequence	Risk Rank		Likelihood	Consequence	Risk Rank
By activity										
1	<i>Environmental Management (GENERAL)</i>	CEMP and Sub-Plans inadequate for the project scope	Reduced environmental performance. Non-conformances. Time delays for CEMP updates	Very unlikely	Severe	19	Review the project planning approval and statutory documentation for requirements relevant to the Project. Identify and implement approval requirements within the CEMP, subplans and ERAPs. Check contract documentation. Identify and implement requirements from the Contract. Establish a register of approvals, licenses and permits. ER oversight of review and implementation of plans.	Very unlikely	Minor	4

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		Lack of environmental objectives and targets	Failure to incorporate environmental objectives and targets into high level decision making which leads to reduced environmental performances	Very unlikely	Severe	19	Review the project planning approval and statutory documentation for requirements relevant to the Project. Identify and implement approval requirements within the CEMP, subplans and ERAPs. Check contract documentation. Identify and implement requirements from the Contract. Establish a register of approvals, licenses and permits. ER oversight of review and implementation of plans, including objectives and targets.	Very unlikely	Minor	4
		Lack of environmental training and education	Decreased motivation and awareness required for behavioural change	Likely	Major	24	Utilise Downer EMS and environmental SME's to manage the project as required and mitigate through toolbox talks, inductions, inspections, internal and external meetings with environmental aspects. Training and supervision.	Unlikely	Moderate	11

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		Not identifying appropriate approvals, licenses or permits required and proceeding without them	Works delayed, infringements, prosecution, poor community relations and reputational loss.	Very likely	Severe	31	Review the project planning approval and statutory documentation for requirements relevant to the Project. Identify and implement approval requirements within the CEMP, subplans and ERAPs. Check contract documentation. Identify and implement requirements from the Contract. Establish a register of approvals, licenses and permits. ER oversight, training and induction, implementation of EMS and CEMP.	Unlikely	Minor	7
	Covid Management	Impacts to program timing via lockdown / available possessions. Require additional approvals (i.e. MAFs) for social distancing		Almost certain	Severe	34	Utilise COVID19 Government Construction Work Order. Develop and implement Covid Safety Plan (site separation) Follow all health orders and procedures and recommendations. Review program and streamline where possible. Adjust methodologies where possible. Additional possessions being added via Sydney Trains.	Very likely	Major	28

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		Outdated risk assessment register	Failure to identify actual environmental risks of site activities leading to reactivity	Likely	Major	24	Revision of risk register at regular intervals. Ongoing review of risk based on site inspections etc. Lessons learnt being shared. 4 week look ahead via planning / construction meetings with appropriate stakeholders.	Unlikely	Minor	7
		Resourcing (Review / Approval)	Timeliness of approval documentation being provided and time in day to complete all tasks	Very likely	Major	28	Active collaboration. Meeting (fortnightly and monthly meeting). Open communication. Prioritisation,	Likely	Moderate	16
		Resourcing	Burn out, skills shortage (domestic and international), market demand.	Almost certain	Major	32	Active resourcing (via remuneration offers / reviews). Team events (covid friendly). Active retention. Fostering a positive workplace culture. Collaboration between internal and external work groups.	Likely	Major	24
2	Site establishment (Ancillary Facilities / Minor AE)	Traffic/car spaces	Loss of parking availability to adjacent residential and commercial properties could result in community complaints.	Almost certain	Major	32	Toolbox meetings with internal and external stakeholders. Signage. Community notification. Complaint response process	Very likely	Minor	18

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		Visual amenity	Light spill occurring during possession / OOHW periods, resulting in complaints.	Very likely	Moderate	23	Preplanning of light tower positions. Toolbox talks. Site inspections. Implementation of VAMP.	Unlikely	Minor	7
		Appropriate selection and management of the ancillary facilities	Inadequate assessment of impacts to surrounding business and residential receivers and environmental receptors. Potential for complaints.	Unlikely	Moderate	11	Appropriate notification. Initial selection of sites. Approval process.	Very unlikely	Minor	4
		AF / MAF being installed improperly or not in compliance with planning approval	non-compliances. Timing delays for applications	Almost certain	Moderate	29	Toolbox talks. Approval process though checklists etc. Training. Planning meetings. Inspections	Very unlikely	Minor	4
		Temporary construction sheds and storage containers	Surrounding aesthetic temporary altered during construction	Very likely	Moderate	23	Correct initial placement to reduce impacts. Hoardings. Implementation of VAMP. Don't double-stack.	Unlikely	Minor	7
3	General construction activities	Management of heavy vehicles	Complaints from sensitive receivers due to increased level and frequency of noise.	Unlikely	Minor	7	Implement measures outlined within CTMP. Toolbox and induction of proper management. Undertake good neighbour approach. Scheduling of deliveries during standard hours.	Very unlikely	Minor	4

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	Truck deliveries	Un-approved deliveries resulting in non-conformance with project requirements. Noise impact to community / potential complaints.	Likely	Moderate	16	Implement measures outlined within CTMP. Toolbox and induction of proper management. Undertake good neighbour approach. Scheduling of deliveries during standard hours.	Unlikely	Minor	7
	General construction traffic disturbing public access between local roads.	Disturbance to local residents resulting in complaints being made, limited access, potential for delays at local road access points resulting in complaints.	Unlikely	Minor	7	Mitigation measures undertaken in accordance with TCP, ROL's, CTMP and good neighbour approach. Active notification via comms team.	Unlikely	Minor	7
	Sediment laden runoff from construction works leaving site	Degradation of local watercourses. Increased turbidity in local water ways resulting in impact on aquatic life. Fines for sediment escaping site.	Likely	Major	24	Mitigation Measures as per SWMP and n any ESCP to be implemented. Install erosion and sediment controls within the project area. Ensure measures are inspected and maintained as the works progress and also prior to and post rainfall events. Provide training and awareness on the need to prevent pollution. Relevant people to undertake Erosion and Sediment Control training.	Unlikely	Moderate	11

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	Non-compliant water from construction works discharged from site	Non-compliant water entering stormwater system waterways (i.e. polluting - not compliant with discharge criteria).	Unlikely	Major	17	Environmental Manager to approve all water discharges from site. Induction and toolbox talks. Toolbox training on site procedures for water discharge. Educate site staff on requirements and consequences of prosecution	Very unlikely	Moderate	8
	Exhaust from plant and equipment.	Emissions resulting in air pollution.	Unlikely	Minor	7	Inductions and toolbox training on dust and air quality management. Well maintained plant/ equipment and prestart checks and servicing. Non-compliant vehicles removed from site / repaired.	Very unlikely	Minor	4
	Loss of on-street car parking in adjacent residential streets and commercial areas during construction.	Loss of parking availability to adjacent residential and commercial properties could result in community complaints.	Very likely	Moderate	23	Community notifications in accordance with the OCCS. Site vehicles shall be parked within the rail corridor and not affect public parking area where possible. Develop CTMP / Traffic control procedures. Limited street parking available around the Project sites.	Unlikely	Minor	7

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		Noise and vibration from general construction activities resulting in impact to residents	Disturbance to residents or neighbouring businesses. Potential for complaints.				Mitigation measures as per NVMP are to be implemented. Respond to community enquiries and complaints in accordance with Sydney Metro requirements and implement the OCCS. Consult with the community in relation to upcoming activities that may result in concern. Monitor noise and vibration for compliance as the works progress at receiver locations. Provide periods of respite for high noise generating activities. Apply noise mitigation measures during entire project. Noise efficient equipment to be used on site. Determine vibration limits and structure/receiver offset distances. Ongoing vibration monitoring during vibration intensive works.			
				Almost certain	Moderate	29		Very likely	Minor	18
4	Stockpiling	Dust	Inappropriate stockpiling of vegetation and topsoil, resulting in wind and water erosion causing	Unlikely	Minor	7	Develop Environmental Control Maps to show stockpile areas. Utilise appropriate locations for stockpiling (away from waterways,	Very unlikely	Minor	4

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		weed/seed dispersion offsite.				watercourses, drains where feasible and reasonable). Designated vegetation stockpiling areas. Minimise stockpiling / Use temporary stockpiling. Cover stockpiles if left for extended periods			
	Visual amenity	Surrounding aesthetic temporary altered during construction	Unlikely	Minor	7	The work area shall be maintained in an orderly manner	Very unlikely	Minor	4
	Contamination	Stockpiling contaminated material, resulting in potential for contamination to spread via wind or water. Potential for cross contamination of clean vs contaminated material.	Likely	Moderate	16	Implement contamination management procedures from within SWMP. Identify any contamination hotspots and incorporate procedures for these locations into construction documentation. Apply the unexpected finds procedure within the SWMP. Induct personnel on unexpected finds procedure. Inspections of excavated and filled surfaces would be made during Construction to determine the presence of visible asbestos. Conduct further site	Unlikely	Minor	7

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							investigations to determine the presence and extent of contamination prior to Construction works commencing. Contaminated soils would not be stockpiled on the structural fill layer or formation layers.			
5	Excavation/Piling/unstabilised area	Dust	Material leaving site during windy days, resulting in complaints and bad air quality	Unlikely	Minor	7	monitoring weather forecast, daily check in with site supervisors, pre-wetting down areas, weekly environmental inspections, site team inspections, notifying coms team when such event is forecast, water truck/water cart trailer/hoses/sprinklers	Very unlikely	Minor	4
		Noise	Disturbance to residents or neighbouring businesses. Potential for complaints.	Likely	Moderate	16	Mitigation measures as per NVMP are to be implemented. Respond to community enquiries and complaints in accordance with Sydney Metro requirements and implement the OCCS. Consult with the community in relation to upcoming activities that may result in concern. Monitor noise and vibration for compliance as the	Unlikely	Minor	7

							works progress at receiver locations. Provide periods of respite for high noise generating activities. Apply noise mitigation measures during entire project. Noise efficient equipment to be used on site. Determine vibration limits and structure/receiver offset distances. Ongoing vibration monitoring during vibration intensive works.			
	Works with the potential to intercept groundwater table	Ground water entering excavations. Without appropriate safeguards onsite could lead to ground water contamination. Spreading contamination via groundwater management	Unlikely	Minor	7	Implement the controls within Appendix E - Procedure 2: Groundwater Induction and toolbox talks Toolbox training on site procedures for water discharge. Educate site staff on requirements and consequences of prosecution. Environmental Manager/representative to approve all water discharges from site	Very unlikely	Minor	4	
	Disturbance of ASS/PASS	Mobilisation of metals within runoff to levels toxic to natural systems. Release of acidic runoff.	Unlikely	Minor	7	Assess risk for acid sulphate soils, and if the risk is determined to be high then implement the Acid Sulphate Soils. Procedure (refer to	Very unlikely	Minor	4	

							SWMP). Awareness training in the identification and management of ASS. Provide containment and treatment facility on site. Ensure ASS material is left under the water table, disposed off-site or appropriately treated in a bunded area with sump.			
	Unknown Contamination	Unknown contamination being identified resulting in program and cost delays. Health impacts				16	If contaminated soil is encountered, all works are to stop in the vicinity of the find and investigations commence. Unexpected finds procedure within the SWMP to be implemented. Induct personnel on location, type, nature, concentration of contaminants on site if found.	Unlikely	Minor	7
	Known Contamination	Incorrect classification of waste (spoil) resulting in incorrect / illegal disposal/reuse.				17	Inductions, toolbox talks and training on recycling facilities and waste segregation practices. Separation of waste on site. Tracking of disposal processes. All contamination hotspots would be clearly marked in the field (where possible). Hotspots will be shown within	Unlikely	Moderate	11
			Likely	Moderate						
			Unlikely	Major						

							contamination mapping and will be included in the Permit to Disturb process. Implement contamination management procedures from within SWMP. Identify any contamination hotspots and incorporate procedures for these locations into construction documentation. Apply the unexpected finds procedure within the SWMP. Induct personnel on unexpected finds procedure.			
6	Concrete pours	Washout activities	Sediment laden/alkaline water polluting surrounding stormwater system /watercourses.	Unlikely	Major	17	Utilise wash out areas / bags as outlined within ESCP / ECM. Inductions and toolbox. Ongoing management by on-site enviro team.	Very unlikely	Moderate	8
		Pour overrun	Overrun of project hours, resulting in potential non-compliance with planning approval and complaints	Unlikely	Moderate	11	Preplan with OOHW applications being submitted. Scheduling of works. Submit last minute application if needed. Ongoing consultation with Metro and ER. Active community management of overruns if needed.	Very unlikely	Minor	4

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		Concrete equipment malfunction	Failure of equipment resulting in concrete being released into local environment. Complaints and property damage.	Unlikely	Moderate	11	Ensure equipment brought to site is working properly. Ensure ERSED in place generally. Clean up properly. Community management following event.	Unlikely	Minor	7
7	Possession works	Out of hours works	Scope or scheduling not appropriately assessed, resulting in louder than anticipated outcomes or non-compliances Construction team not providing the scope of works in time for appropriate noise modelling to be undertaken	Almost certain	Severe	34	Site team to focus on high noise impact activities, t-8 meetings, using typical/HB made the process more efficient, modelling tool (gateway) ability to change scope of works and impact on modelling, competent environmental staff, walk with PMs (checking lighting requirement, plant/equipment needs checks...etc.)	Unlikely	Minor	7
		Provision of Respite Offers / Alternative Accommodation	Inappropriate modelling resulting in incorrect application of RO/AA to community, resulting in complaints.	Unlikely	Major	17	Ensure robust review of modelling within OOHW applications. Ensure scopes are suitably included within noise model. Allow the provision of discretionary RO/AA to surrounding residences if complaints are submitted.	Very unlikely	Moderate	8
		Christmas (2 week) shutdown	lessons learnt from mid-year shutdown not applied	Unlikely	Major	17	Review lessons learnt and ensure actions have been attributed	Very unlikely	Minor	4

							and closed out. Utilise lessons learnt from other possessions.			
		OOHW Application Submission	Lateness of application, resulting in approval delays.	Unlikely	Moderate	11	Ensure submission deadlines are met and reviews are undertaken in a timely manner	Very unlikely	Moderate	8
8	Works near heritage building / AARD areas	Impact to heritage items including vibration	Damage to heritage fabric of heritage items by Project works (service strike, vibratory works)	Likely	Major	24	Implement the mitigation measures within the HMP and CNVMP. General inductions toolbox training on heritage management protocols. Label any known heritage items on Environmental Control Maps. Work within the safe working distances nominated in the NVMP. Undertake vibration compliance monitoring as per the NVMP. Clearly highlight no-go zones on the ECM and communicate requirements to construction personnel during pre-start briefs, inductions and toolbox talks. Demarcation of worksites and communicate it clearly with all construction personnel. The method for the demolition of	Unlikely	Moderate	11

							existing elements at the Project sites would be developed to minimise direct and indirect impacts to adjacent and / or adjoining heritage items. Undertake appropriate vibration baseline monitoring			
	Unexpected finds	Work delays, additional studies, approvals required, damage to heritage item.		Unlikely	Moderate	11	Implement the mitigation measures within the HMP. General inductions toolbox training on heritage management protocols. Label any known heritage items on Environmental Control Maps. If suspected heritage item encountered. Works to stop immediately and implement the Sydney Metro Unexpected Heritage Finds Procedure (refer to HMP). Clearly highlight no-go zones on the ECM and communicate requirements to construction personnel during pre-start briefs, inductions and toolbox talks.	Very unlikely	Minor	4

		Archaeological oversight	Ground works not adequately supervised	Unlikely	Moderate	11	Implement the mitigation measures within the HMP. General inductions toolbox training on heritage management protocols. Label any known heritage items on Environmental Control Maps. If suspected heritage item encountered. Works to stop immediately and implement the Sydney Metro Unexpected Heritage Finds Procedure (refer to HMP). Clearly highlight no-go zones on the ECM and communicate requirements to construction personnel during pre-start briefs, inductions and toolbox talks. Ensure adequate supervision by archaeologist	Very unlikely	Minor	4
9	Utility works	Impact to existing services	Service strike leading to environmental degradation	Almost certain	Severe	34	Develop and implement the Utilities Management Strategy in accordance with the Utilities Management Framework Engage a Utilities Coordination Manager (UCM) to oversee the coordination of utility works across the project	Very unlikely	Minor	4

							and with third part service providers. The UCM will collaborate with the Community and Stakeholder Manager, the Place Manager and, where required, the Community Complaint Mediator to mitigate impacts to the local community during utility works and to resolve any community complaints relating to utility works. Implement a Permit to Disturb Induction and toolbox talks Detailed Site Survey to be managed by an appropriately qualified surveyor.			
	Working outside of SPIR project boundary	Community raising issue with working outside of SPIR boundary.	Very unlikely	Moderate	8	Metro planning advice that utility works outside of the project boundary and covered by the planning approval. Community consultation of upcoming works	Very unlikely	Minor	4	
	utility disruptions within standard hours and OOHW periods.	impacts to residents (water/power), resulting in complaints.	Unlikely	Moderate	11	review of weather (times of high flow) to limit impact on infrastructure and residents, Active consultation with utility providers and preparation of OOHW as required.	Very unlikely	Minor	4	

10	<i>Storage and use of hazardous substances</i>	<p>Storage of hazardous substances, leaking plant and equipment and spillage from refuelling.</p>	<p>Localised ground contamination / pollution of stormwater and requiring clean-up and/or receiving fines.</p> <p>Risk of igniting volatile substances. Unauthorised access to site / potential vandalism/damage leading to pollution.</p>	Likely	Moderate	<p>Induction, toolbox talks and training on appropriate handling and storage of liquids. All storm water drains should be identified prior to works and protection installed. Storage areas to be away from sensitive areas and appropriately bunded. SDS approved prior to bringing hazardous substances on site including risk assessment. Environmental Control Maps show storage locations and associated controls e.g. spill kits, etc. Training in use of spill kits. Contingency plans would be developed to deal with any spills which might occur during Construction. Clearly label containers. Regular auditing and inspection of storage areas and materials. Make storage areas restricted access areas. Reduce/eliminate need for hazardous substances. Ensure all work sites are secure</p>	Unlikely	Minor	7
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							before leaving the site. All liquids i.e. paint etc. are to be securely locked away at the end of each day			
11	Vegetation removal/pruning	Vegetation trimming /clearing required outside approved work area	Unauthorised works / removal of vegetation outside defined work area, possibility of removing threatened species, fines incurred.	Very unlikely	Moderate	8	Implement the controls within Appendix E – Procedure 1: Biodiversity Induction and toolbox training on clearance zones and required protection measures If vegetation, other than grass and weeds, needs to be trimmed or removed, further assessment would be undertaken in accordance with the CEMF and CoA. If trees require trimming or removal, the requirements of CoA E5 would be implemented. Inspections during clearing activities. Fencing in place/ clear marking of trees to be retained and cleared / demarcation areas / plans showing clearing areas. Preclearing	Very unlikely	Minor	4

						checklist to be completed before any clearing of vegetation.			
	Secondary Approvals (i.e. Councils)	Councils not providing approval to remove trees / vegetation	Likely	Moderate	16	Active management and consultation during design phase and construction phase. Ongoing discussions with Councils. Capture of trees within Tree Management Strategy. Review of legal options of CSSI vs Council approvals.	Unlikely	Moderate	11
	Impacts to threatened vegetation (TEC)	Unauthorised works / clearing of known TEC communities and protected vegetation, resulting in non-compliance and regulatory action. Potential for offsetting to be enacted.	Unlikely	Major	17	Undertake segregation fencing of known TEC areas. Undertake supervision of any clearing via arborists / ecologists. Utilise internal tree permits and Tree Reports. Ensure compliance with CEMP hold points. Active management when working in close proximity to known areas to avoid strikes. Inductions and to boxes. Use of ECM's.	Very unlikely	Major	13

						#N/A				#N/A
12	MSB/Above ground structures	visual impact of construction works (steel structure)	Complaints by community	Unlikely	Moderate	11	Consultation of upcoming works with surrounding residences. Utilise visual impact assessments. Proactive design of stations and MSB's to minimise visual impacts	Very unlikely	Minor	4
		change of works force (i.e. civil workers moving to fit out contractors), behaviour	New workforce untrained/unfamiliar with site requirements, resulting in potential environmental or community issues.	Likely	Moderate	16	inductions to be reviewed, retrained workers, advising new crew of things happening on site (fuel storage, visual amenity, heritage...etc), review induction form for relevance to stage of works	Unlikely	Moderate	11
		bridge/road shut down	traffic impacts due to increased personnel and road closures	Likely	Moderate	16	TMP, TCP, tool boxing where trades can park, traffic controls, CA for road closure, community notifications, signage, VMS boards, diversions/detours	Unlikely	Minor	7
13	Community	General worker behaviour	Inappropriate worker behaviour (i.e. smoking outside of designated zones, worker parking, work interacting with the community), resulting in	Almost certain	Moderate	29	Toolbox, talks, inspection and supervision. Designated smoking areas / ashtray. Alternate worker parking investigations. Internal and external communications with contractor. Inductions	Likely	Minor	12

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		complaints							
	Avoidable complaints	Inappropriate environmental controls being in place. Truck idling, Working Parking, resulting in completion. Concrete spillage. Property damage	Likely	Moderate	16	Toolbox, talks, inspection and supervision. Inductions. Pre-possession inspections. Lessons Learnt. Team meetings. Traffic controls for parking idling. Dilapidation surveys. Selection of plant prior to works occurring. Utilisation of monitoring data. Implementation of CEMP and sub-plans.	Unlikely	Minor	7
	Covid Management (Additional possessions etc)	Additional possession resulting in further community angst. Residents being confined to their own residences during lockdown. Actual fear of catching COVID. Offers of AA not being offered / taken up.	Almost certain	Major	32	Ongoing complaints management. Proactive and tailored communication management with residents on upcoming works, scope and programs. Offers such as RO / AA being provided when applicable. Ongoing and open communication. Active Covid controls (i.e. site supervisor / covid marshals enforcing rules)	Likely	Minor	12

	AA and RO process	not adequate notice causing distress on the residents and pressure on comms team. Financial stress (hard to find affordable accommodation)	Likely	Major	24	OOHWA submitted 15 business days prior to work commencing, Review process, ongoing collaboration with SM, lessons learnt from last shutdown (better RO). Discretionary RO/AA	Unlikely	Moderate	11
	Management of complaints	Complaints not been captured or actioned in an appropriate timeframes	Unlikely	Major	17	site good at notifying comms team of issues that might result in complaints (proactive approach). Active and open channel of communication between contractor and Sydney Metro. Use of on call resources. Review of complaints line.	Very unlikely	Moderate	8

Sydney Metro Consequence Criteria

	ENTERPRISE RISK CONSEQUENCES					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
Environment	No appreciable changes to environment and/or highly localised event.	Change from normal conditions within environmental regulatory limits & environmental effects are within site boundaries.	Short-term and/or well-contained environmental effects. Minor remedial actions probably required.	Impacts external ecosystem & considerable remediation is required.	Long-term environmental impairment in neighbouring or valued ecosystems. Extensive remediation required.	Irreversible large-scale environmental impact with loss of valued ecosystems.

Sydney Metro Likelihood Criteria and Risk Matrix

Probability	One off event How likely?	Repeated How often?	Likelihood		Consequences					
					C6	C5	C4	C3	C2	C1
					Insignificant	Minor	Moderate	Major	Severe	Catastrophic <i>Transformational for opportunities</i>
Frequency	Expected to occur frequently during time of activity or project. Greater than a 90% chance of occurring.	10 times or more every year	Almost certain	L1	20	22	29	32	34	36
	Expected to occur occasionally during time of activity or project. A 75-90% chance of occurring.	1-10 times every year	Very Likely	L2	14	18	23	28	31	35
	More likely to occur than not occur during time of activity or project. A 50-75% chance of occurring.	Once each year	Likely	L3	9	12	16	24	27	33
	More likely not to occur than occur during time of activity or project. A 25-50% chance of occurring.	Once every 1 to 10 years	Unlikely	L4	6	7	11	17	25	30
	Not expected to occur during the time of activity or project. A 10-25% chance of occurring.	Once every 10 to 100 years	Very Unlikely	L5	3	4	8	13	19	26
	Not expected to ever occur during time of activity or project. Less than 10% chance of occurring.	Less than once every 100 years	Almost Unprecedented	L6	1	2	5	10	15	21

Appendix D: Downer and Sydney Metro Environment and Sustainability Policies, Sydney Metro Environment and Sustainability Commitments and Downer ISO 14001:2015 Certification

<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: center;"> <p>Environment & Sustainability Policy</p> </div>  </div> <p>This Policy reflects a commitment in our delivery of the Sydney Metro program to:</p> <ul style="list-style-type: none"> Align with, and support, Transport for NSW (TfNSW) Environment & Sustainability Policy. Optimise sustainability outcomes, transport service quality, and cost effectiveness. Develop effective and appropriate responses to the challenges of climate change, carbon management, resource and waste management, land use integration, customer and community expectation, and heritage and biodiversity conservation. Be environmentally responsible, by avoiding pollution, enhancing the natural environment and reducing the project ecological footprint, while complying with all applicable environmental laws, regulations and statutory obligations. Be socially responsible by delivering a workforce legacy which benefits individuals, communities, the project and industry, and is achieved through collaboration and partnerships. <p>To deliver on these commitments, the Sydney Metro team will:</p> <p>Industry leadership</p> <ul style="list-style-type: none"> Implement coordinated and transparent decision making, by engaging with stakeholders and suppliers, encouraging innovation and demonstrating sustainability leadership. Explore new benchmarks for the transport infrastructure sector by requiring high standards from our designers, contractors and suppliers, building on experience gained through development of Sydney Metro Northwest. <p>Community and customer</p> <ul style="list-style-type: none"> Provide accessible, safe, pleasurable, and convenient access and transport service for all customers. Establish positive relationships with community and stakeholders to maximise opportunities to add value to local communities. <p>Land use integration and place making</p> <ul style="list-style-type: none"> Create desirable places, promote liveability, cultural heritage, and optimise both community and economic benefit. Balance transit oriented development opportunities with stakeholder expectations. <p>Embedding environmental and social sustainability</p> <ul style="list-style-type: none"> Establish robust sustainability objectives and targets. Maintain an environmental management system that is integrated into all our project activities. Ensure thorough and open environmental assessment processes are developed and maintained. Develop and maintain an environmental management framework to embed best practice pollution management and sustainable outcomes during construction. Apply effective assurance processes to monitor performance against the project environment and sustainability objectives and identify appropriate reward or corrective action, as required. Apply environment and sustainability specific processes to the procurement of delivery activities. <p>Accountability</p> <ul style="list-style-type: none"> Undertake public sustainability reporting. Hold employees and contractors accountable for proactively meeting their environmental and social sustainability responsibilities. Provide appropriate training and resources necessary to meet our responsibilities. <p>Rodd Staples Program Director, Sydney Metro</p> 	<div style="display: flex; justify-content: space-between; align-items: center;">   </div> <h2 style="text-align: center;">ENVIRONMENTAL SUSTAINABILITY POLICY</h2> <p>Our goal is environmental sustainability in providing our services to customers in global markets including transportation, energy and resources, industrial, infrastructure and commercial services, and facilities.</p> <p>OUR COMMITMENT IS TO</p> <ul style="list-style-type: none"> minimise the short and long-term impact of our activities on the environment and local communities through responsible environmentally sustainable management within design, planning, delivery, construction, manufacturing and operation promote a positive culture through implementing initiatives that foster sustainable innovation; optimise our products and services to relentlessly improve our environmental sustainability performance and improve the sustainable use of natural resources. comply with relevant environmental legislation, appropriate industry guidelines and standards, customers and regulatory agency requirements implement responsible resilient work practices that minimise the impact on local communities implement and maintain an environmental management system consistent with international standard AS/NZS ISO 14001 which integrates requirements throughout the overarching operational systems establish, monitor and review environmental sustainability objectives and targets and identify opportunities to improve our environmental sustainability evaluate the performance, effectiveness and compliance of our environmental management systems through regular audits and reviews implement effective controls to identify, evaluate, eliminate or reduce adverse environmental risks from our work activities take all practical steps to prevent pollution and protect biodiversity and ecosystems drive innovation to identify sustainable supply chains; reduce and manage energy, waste, and water consumption; reduce and manage air emissions effluents; and climate change mitigation and adaptation procure goods and services to minimise environmental risk and maximise sustainable opportunities and benefits for the total life cycle regularly report our environmental sustainability performance and consult with stakeholders provide education, training and encouragement to our workforce, and business partners to understand their responsibilities for the implementation of environmental sustainability principles and practices; and display this policy, making it publicly available and sharing it with interested parties. <div style="text-align: center;">  <p>Grant Fenn CEO and Managing Director Downer Group</p> </div> <div style="display: flex; justify-content: space-between; font-size: small;"> <p>Downer EDI Limited ABN 67 003 872 848</p> <p>June 2019 DG-ZH-PO200</p> <p>Page 1 of 1 Version: 1.0</p> </div>
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Certificate of Registration

Awarded to

Downer - Australian Operations. Road Services, Transport Projects and Utilities

Level 10, 567 Collins Street, Melbourne, VIC 3000, Australia
(This is a multi site certification, other sites are referred in Annexure-A)

Operates an Environmental Management System which complies with the requirements of

ISO 14001: 2015

for the following scope:

Downer works across the full infrastructure value chain including design, construction, commissioning, operation, monitoring, asset management, maintenance, refurbishment, renewal and replacement.

(the detailed description of scope is referred in Annexure-B)

Certificate Number: 477140016100120

Original Issue Date: 09/09/2016
Current Issue Date: 05/09/2019
Expiry Date: 04/09/2022

Sharmin Mahmud, MBA, PhD
General Manager Risk and Compliance

Registered by:
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Head Office: 433 Logan Road, Stones Corner, QLD 4120, Australia
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Expiry is subject to regular surveillance audits and applied Terms & Conditions of GRS.
This certificate cannot be treated as a legal document and must be returned to GRS upon request.



Environment & Sustainability Statement of Commitment

Sydney Metro will deliver great services, places and transport infrastructure for our customers while protecting the environment, contributing to economic prosperity and delivering social benefits for the communities we serve. We have a duty to undertake our activities in the interest of the greater good, to move beyond compliance and be a genuine leader in both environmental management and sustainability.

Sydney Metro is committed to:

- Minimising our impacts and leaving a positive environmental and social legacy;
- Delivering a resilient asset and service for our customers;
- Collaborating with stakeholders to innovate and drive sustainable outcomes; and
- Embedding sustainability into our activities;

To deliver on these commitments Sydney Metro will:

Leave an environmental and social legacy

- Protect the environment, prevent pollution and comply with legal and other requirements;
- Manage resources and waste efficiently, exploring opportunities to minimise waste, use recycled and low impact materials and reduce our environmental footprint;
- Promote a diverse and inclusive workforce and supply chain, build capability and capacity within industry, and increase Aboriginal participation;
- Responsibly manage environmental and social risks in our supply chain;
- Create liveable places that are well integrated and promote active and sustainable transport;
- Conserve and enhance the natural environment and our built and cultural heritage;
- Work collaboratively with delivery partners to provide social benefits to the communities in which we work;

Drive resilience

- Tackle climate change and contribute to the NSW Government target of net zero emissions;
- Deliver Sydney Metro assets and operations that are resilient to a changing climate, and work with stakeholders to proactively respond to emerging challenges and opportunities;
- Promote the greening of our cities to help combat the 'urban heat island' effect;

Collaborate to deliver sustainable outcomes

- Align with and respond to Transport for NSW policy and other NSW Government priorities;
- Establish and maintain positive relationships with communities and stakeholders to harness local knowledge and maximise opportunities to add value across the project lifecycle;
- Collaborate and consult with Aboriginal stakeholders to understand how we can best respect and celebrate Aboriginal cultural values including Designing with Country;
- Provide industry leadership by setting benchmarks, encouraging innovation and driving continual improvement with our delivery partners;
- Increase environmental awareness amongst staff and customers to drive more sustainable behaviours;

Embed sustainability

- Establish robust objectives and targets that are measurable and take into account whole-of-life considerations;
- Maintain an environmental management system that is integrated into our projects and continually improved to enhance environmental performance;
- Apply effective assurance processes to monitor environment and sustainability performance including ensuring accountability, incentivising beyond compliance behaviours and implementing corrective actions as required;
- Embed sustainability considerations into key project decisions across the project lifecycle;
- Provide appropriate training and resources to meet our obligations and commitments;
- Publicity report on sustainability performance;

Jon Lamonte
Chief Executive, Sydney Metro

This Statement of Commitment supersedes previous versions of the Sydney Metro Environment & Sustainability Policy and aligns with the current wide NSW Environment and Sustainability Policy which has been adopted by Sydney Metro. It applies to all people working for Sydney Metro.
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Appendix E: Environmental Procedures

Procedure 1: Biodiversity

Impact: Biodiversity impacts related to the Project are expected to be minor. There will be some removal of trees and vegetation associated with site establishment, construction of the services building, and embankment stabilisation works. Pre-clearance inspections will be undertaken prior to the removal of any trees.

Objective	To comply with contractual and legislative requirements and ensure that native fauna and flora are protected from Construction activities		
Targets	No death or injury to fauna No unapproved destruction of flora		
Legal, Contractual & Other Requirements	Planning consent conditions – SSI 8256		
Site specific planning / approval conditions / licence conditions	CoA – E3-E6 Mitigation measures committed in the EIS & SPIR CEMF Section 11		
Potential impacts and Initial Risk Rating Refer to Appendix 3 for Risk Matrix	Potential impact	Initial Risk Rating	
		P X	C Risk
	Death or injury of fauna	L4	C3 17
	Unapproved damage or removal to threatened plant species, threatened vegetation community or habitat resources	L4	C3 17
	Unapproved removal or trimming of vegetation	L4	C5 7

Controls (means & resources)	Commitments & Mitigation Measures outlined in the EIS / SPIR:		
	Mitigation Measure	Applicable to the Project	Responsibility
	Environmental Performance Outcome (EPO) Biodiversity 1 - The project is designed to minimise impacts on biodiversity. Where practicable, the design minimises the need to clear vegetation.	Applicable	Environmental Manager Design Manager
	EPO Biodiversity 2 - Potential impacts on biodiversity are managed in accordance with relevant legislation, including the EP&A Act, BC Act, EPBC Act, and the <i>Noxious Weeds Act 1993</i> .	Applicable	Environmental Manager Construction Manager Site Supervisor
	EPO Biodiversity 3 – The biodiversity outcome is consistent with the <i>Framework for Biodiversity Assessment</i> (OEH, 2014a).	Applicable	Environmental Manager Construction Manager Site Supervisor
	EPO Biodiversity 4 - Offsets are provided in accordance with the NSW Biodiversity Offsets Policy for Major Projects (OEH, 2014).	Applicable	Environmental Manager Construction Manager
	REMM B1 - Detailed design and Construction planning would avoid direct impacts to vegetation mapped as threatened ecological communities or native plant community types, specifically Downy Wattle Turpentine - Grey Ironbark open forest on shale, Degraded Turpentine - Grey Ironbark open forest on shale and Broad-leaved Ironbark – Grey Box.	Applicable	Environmental Manager Design Manager Construction Manager Site Supervisor
	REMM B2 - Pre-clearing surveys and inspections for endangered and threatened flora and fauna species would be undertaken by qualified ecologists prior to any clearing occurring. The surveys and inspections, and any subsequent relocation of species, would be undertaken in accordance with the measures provided in the biodiversity assessment report.	Applicable	Environmental Manager Construction Manager Site Supervisor
	REMM B3 - Areas of biodiversity value outside the project area would be marked on plans, and fenced or signposted where practicable, to prevent unnecessary disturbance.	Applicable	Environmental Manager Construction Manager Site Supervisor
	REMM B4 - Impacts to Downy Wattle Turpentine - Grey Ironbark open forest on shale, Degraded Turpentine – Grey Ironbark open forest on shale and Broad-leaved Ironbark – Grey Box would be avoided. The locations of these species and communities would be marked on plans, fenced on site, and avoided.	Applicable	Environmental Manager Construction Manager Site Supervisor
	REMM B5 - Equipment storage and stockpiling would be restricted to identified compound sites and already cleared land.	Applicable	Environmental Manager Construction Manager Site Supervisor
	REMM B6 - A trained ecologist would be present during the clearing of native vegetation or removal of potential fauna habitat to avoid impacts on resident fauna and to salvage habitat resources as far as is practicable.	Applicable	Environmental Manager Construction Manager Site Supervisor
	REMM B7 - Priority weeds would be managed in accordance with the <i>Biosecurity Act 2015</i> . Weeds of national environmental significance would be	Applicable	Environmental Manager Construction Manager

<p>managed in accordance with the Weeds of National Significance Weed Management Guide.</p>		<p>Site Supervisor</p>
<p>REMM LV4 - The management of trees during detailed design and construction planning would be guided by the project's Tree Management Strategy, which would be developed in consultation with councils and include consideration of relevant local plans and strategies. Where removal cannot be avoided, trees would be replaced in accordance with the Tree Management Strategy, including replacement of removed trees in a two for one ratio. Opportunities to retain and protect existing trees would be defined during detailed design and construction planning, in accordance with the project's Tree Management Strategy. The design would aim to reduce tree removal to the extent practicable, particularly where they contribute to screening vegetation or landscape character.</p>	<p>Applicable</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>
<p>REMM LV12 - Trees to be retained would be protected prior to the commencement of construction in accordance with AS4970-2009 Protection of trees on development sites and the project's Tree Management Strategy. Any tree pruning would be undertaken in accordance with the project's Tree Management Strategy, guided by a tree report prepared by a qualified arborist.</p>	<p>Applicable</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>

Site Specific Mitigation & Control Measures developed as part of this CEMP:

Mitigation Measure	Responsible
<p>The design will take into consideration the location of vegetation and will aim to minimise vegetation clearing, tree trimming and tree removal, particularly in relation to threatened plant species, threatened vegetation communities and habitat resources. Appropriate justification will be provided for impacts to trees within the Tree Report</p>	<p>Design Manager Environmental Manager</p>
<p>A Tree Report is to be produced by a qualified arborist in consultation with the design team and Environmental Manager.</p>	<p>Environmental Manager Construction Manager</p>
<p>Appropriately trained and qualified tree removal contractors to be used.</p>	<p>Construction Manager Site Supervisor</p>
<p>Awareness training in the need to preserve vegetation to be retained.</p>	<p>Environmental Manager Construction Manager</p>
<p>Provide barricading or other suitable protection measures for trees to be retained</p>	<p>Construction Manager Site Supervisor</p>
<p>Biodiversity offsetting will occur in accordance with CoA E3 where impacts to threatened ecological communities or endangered species cannot be avoided.</p>	<p>Environmental Manager</p>
<p>Where required in accordance with the design some trees will be removed and offset in accordance with requirements of CoA E4 and CoA E6.</p>	<p>Environmental Manager Site Supervisor</p>

	<p>If native fauna is identified within the disturbance footprint, the Principal Contractor's Environmental Manager will be contacted immediately. All necessary steps to minimise harm and mortality to such animals is required.</p>	<p>Construction Manager Site Supervisor</p>
	<p>Open excavations and storage areas to be inspected regularly for the presence of fauna species.</p>	<p>Site Supervisor</p>
	<p>No clearing or vegetation removal to occur without approval.</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>
	<p>All vegetation to be retained shall be protected and demarcated. These areas will be highlighted on the Environmental Control Maps. The clearing limits and protected vegetation is to be clearly communicated to site personnel during site inductions and toolbox talks.</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>
	<p>Works will only be undertaken in designated areas.</p>	<p>Construction Manager Site Supervisor</p>
	<p>The Principal Contractor will identify and remove any weeds within their work area. Any weeds will be lawfully disposed of to a licenced facility.</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>
	<p>Segregate weed impacted waste material and dispose of to a licenced facility.</p>	<p>Construction Manager Site Supervisor</p>
	<p>Inspect plant and machinery before entering and leaving worksite to ensure no dirt remains as it may cause weeds to spread.</p>	<p>Construction Manager Site Supervisor</p>
	<p>Educate work force on common weeds within Bankstown rail corridor.</p>	<p>Environmental Manager</p>
	<p>Plant and equipment brought on to site must be cleaned and free of deleterious material, mud and other material that may harbour weed seeds.</p>	<p>Site Supervisor</p>
	<p>Construction plant, equipment and materials are not to be stored within the dripline of any trees or vegetation to be retained.</p>	<p>Construction Manager Site Supervisor</p>
	<p>The following clearing procedure will be implemented should additional clearing be required.</p>	<p>See flow chart</p>

	<p><u>1. Delineation of area to be cleared</u></p> <p>Vegetation to be cleared will be clearly marked. Habitat trees in close proximity to construction activities will be clearly marked and protected. Marked boundaries will be cross-referenced to the approved impact area.</p> <p>In circumstances where native vegetation or mature tree clearing is required outside of the approved development footprint, an ecologist will inspect the proposed area and provide advice on the impact to flora and fauna and appropriate management.</p> <p>↓</p> <p><u>2. Pre-clearance inspections</u></p> <ul style="list-style-type: none"> • Pre-clearance inspections will be undertaken within two weeks prior to the commencement of vegetation clearing. • The pre-clearance inspections will include identification and inspection of trees containing hollows. Any isolated trees that have been identified as providing hollows, and which are located close to the construction areas, will be protected during construction. • Should any threatened species be identified within the project area, the Environment Manager shall be notified immediately. <p>↓</p> <p><u>3. Vegetation clearance and fauna handling procedures</u></p> <ul style="list-style-type: none"> • Mature trees will be inspected for fauna immediately before and after felling. • Animals found prior to or during clearing activities will be released to surrounding suitable habitat. • If any animal is injured, contact the relevant local wildlife rescue agency (e.g. WIRES) and/or veterinary surgery as soon as practical. Until the animal can be cared for by a suitably qualified animal handler, if possible minimise stress to the animal and reduce the risk of further injury by: <ul style="list-style-type: none"> ○ Handling fauna with care and as little as possible. ○ Covering larger animals with a towel or blanket and placing in a large cardboard box. ○ Placing small animals in a cotton bag, tied at the top. Keeping the animal in a quiet, warm, ventilated and dark location. • In the case of arboreal or flying mammals attempts will be made to relocate the den or roost. After capture, the animal(s) will be held by a trained wildlife carer for a period of no longer than two weeks until the roost or den can be relocated, either as an entire tree or part thereof. • Work may recommence once the animal(s) have been captured and removed from the area. • Felled trees will be placed between cleared and remnant bushland where possible to provide runways of ground cover for dispersal of animals. • Excess material may be mulched and used on site. 	<p>Environment Manager Site Supervisor</p> <p>Environment Manager</p> <p>Environment Manager</p>
<p>Timeframe</p>	<p>Duration of the works.</p>	
<p>Monitoring & Reporting</p>	<p>Tree Report Weekly inspections</p>	

	Vegetation Removal or Trimming Permits Pre-clearance inspections Daily Clearance reports			
Potential impacts and Residual Risk Rating Refer to Appendix 3 for Risk Matrix	Potential impact	Residual Risk Rating		
		P X	C	Risk
	Death or injury of fauna	L5	C3	13
	Unapproved damage or removal to threatened plant species, threatened vegetation community or habitat resources	L5	C3	13
	Unapproved removal or trimming of vegetation	L5	C5	4

In addition to the above table and to comply with the Downer EMS, the following controls will be applied in the case of unexpected discoveries which may require sensitive management.

The following are critical controls to prevent the unauthorised clearance of protected areas:

- Ensure an authorisation has been received prior to disturbing land or vegetation in accordance with the CoA, REMMS and Downer Land and Vegetation Disturbance Permit: DG-ZH-FM071.3
- Restrict access to protected areas with high visibility barriers and signage and include a buffer zone between the barrier and the protected fauna and flora area
- Restrict vehicle and equipment movement to designated access tracks

The following are general flora, fauna and biosecurity controls / mitigation measures:

- All activities must be conducted with minimum disruption to the natural habitat including the removal of rocks, debris or fallen branches on the land surface in order to prevent habitat loss.
- All clearing of vegetation must be kept to a minimum and only be removed with the required approval or permit.
- High visibility barriers and appropriate signage must be installed around protected or sensitive areas and monitored / maintained appropriately
 - o include a buffer zone between the barrier and the protected fauna and flora area
 - o communicate the restricted barriers locations to all staff; and
 - o visually inspect and maintain barriers for duration of works.
- The establishment of access points, parking areas and temporary laydown areas should be determined early to minimise impact.
- Tracks should be maintained to prevent erosion, weed growth and waterlogging, to discourage drivers from driving off track.
- Type and size of the machinery required should be appropriate to the job and selected to minimise disturbance.

- Materials should be placed on established lay down areas.
- No spoil or stockpiles are to be placed on native vegetation.
- Ensure all open excavations (e.g. trenches) are visually inspected daily for any trapped fauna.
- On open excavations that will remain open overnight or for longer than 24 hours, install at least one (1) fauna escape ramp (e.g. scramble matting, ramps, ladders, battered slopes).
- Personnel are not permitted to intentionally feed, harass, harm, injure or kill fauna.
- Fauna must only be handled by approved and appropriately trained fauna handlers.
- All plant/ vehicles must be operated to minimise disturbance and spread of any weeds or pests.

Weed management –

Weeds need to be managed in accordance with the managed in accordance with section 11.2 of SM CEMF to avoid the spread of weeds through the environment. Weed management is to be undertaken in areas affected by construction prior to any clearing works in accordance with the Noxious Weeds Act 1993.

Weed prevention controls include:

- Ensuring plant, equipment and clothing are free of soil and vegetative matter prior to entry to site
- Minimising disturbance of native vegetation
- Ensure erosion controls are in place
- Apply mulch and revegetate as soon as practical.

Weed management:

- Weed removal in accordance with TfNSW approvals requires placing the weed waste in bags or on plastic sheeting to avoid the spread
- Physically demarcate weed trees/area on site of potential clearing or disturbance
- Weed material needs to be removed from site, preferably the same day
- Weed material must not be mulched on site and must only be taken to suitably licenced disposal facilities
- Areas that have had weeds removed need to be stabilised with mulch, biodegradable weed matting or similar.

Tree Protection Zone (TPZ)

Tree protection zones shall be managed in accordance with TfNSW Vegetation Management (Protection and Removal) Guideline - DMS-SD-111.

The project's direct scope of works area has been identified as highly modified urban landscape with no risk for direct or indirect impacts. However, with the completion of Landscaping, TPZs and associated controls will be applied.

A TPZ provides for the viability and stability of trees to be retained by excluding activities within the TPZ unless under authorisation from a qualified ecologist, horticulturalist or arborist.

Activities not to be undertaken in a TPZ without authorisation must include, but are not limited to:

- machine excavation and trenching
- cultivation
- storage, including vehicle and plant parking (unless no alternative exists when carrying out short term work)
- preparation of chemicals, including refuelling
- storage or placement of waste
- wash down and cleaning of equipment
- changing soil levels including placement of spoil
- installation of utilities.

Procedure 2: Groundwater

Impact: There is some potential for Construction activities to intersect the groundwater table

Objective	<ul style="list-style-type: none"> To comply with contractual and legislative requirements in relations to the management of groundwater Reduce the potential for drawdown of surrounding groundwater resources Prevent the pollution of groundwater through appropriate controls Reduce the potential impacts of groundwater dependant ecosystems 		
Targets	All groundwater to be tested before dewatering occurs		
Legal, Contractual & Other Requirements	<ul style="list-style-type: none"> Planning consent conditions – SSI 8256 CEMF Section 7 Water Management Act 2000 NSW Aquifer Interference Policy (NSW Office of Water, 2012) Protection of the Environment Operations Act 1997 		
Site specific planning / approval conditions / licence conditions	In accordance with the Sydney Metro City & Southwest –Sydenham to Bankstown Staging Report the Project does not require a specific Groundwater Management Plan as the likelihood of impacting on groundwater during the works are low. As such, management of any groundwater encountered during the works is to be managed in accordance with this procedure.		
Potential impacts and Initial Risk Rating Refer to Appendix 3 for Risk Matrix	Potential impact	Initial Risk Rating	
	Inappropriate dewatering of groundwater impacting on receiving environment or groundwater source	P X L4	C C5
Controls (means and resources)	Commitments & Mitigation Measures outlined in the EIS / SPIR		
	Mitigation Measure	Applicable to the Project	Responsible
	N/A	N/A	N/A
	Site Specific Mitigation & Control Measures developed as part of this CEMP:		
Mitigation Measure	Responsible		
A dewatering permit is to be in place for all dewatering activities, including the dewatering of any groundwater.	Environmental Manager Site Supervisor		

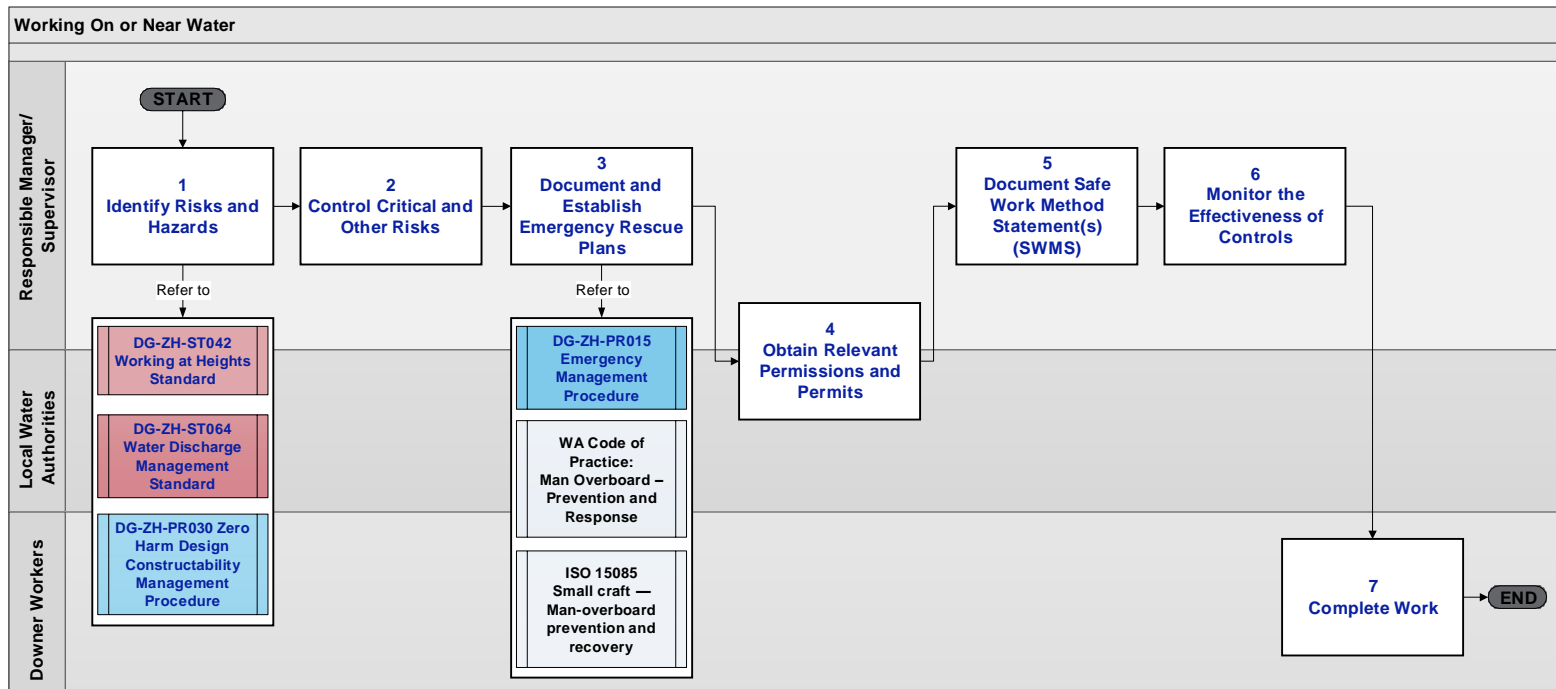
	Awareness training is to be provided to workers as required.	Environmental Manager Site Supervisor					
	Water treatment units are to be utilised and maintained where water testing indicates treatment is required.	Environmental Manager Construction Manager Site Supervisor					
	Dewatering may only occur on site or to licenced discharge points	Environmental Manager Construction Manager Site Supervisor					
Responsibilities	<ul style="list-style-type: none"> Engineering personnel are responsible for identifying any works that may interact with known groundwater sources Engineering personnel are responsible for determining any potential subsidence impacts associated with dewatering of groundwater The Principal Contractor’s Environmental Manager is to organise testing of any groundwater prior to discharge Engineering personnel are responsible for implementing appropriate treatment methods based on the results of groundwater quality testing 						
Timeframe	Duration of Construction						
Monitoring and Reporting	<ul style="list-style-type: none"> Dewatering permit Weekly inspections Inspection and maintenance of treatment units (where applicable) Incidents are to be recorded on form Environmental Incident and Complaint Report 						
Potential impacts and Residual Risk Rating Refer to Appendix 3 for Risk Matrix	Potential impact	Residual Risk Rating					
	Inappropriate dewatering of groundwater impacting on receiving environment or groundwater source	<table border="1"> <tr> <td>P X</td> <td>C</td> <td>Risk</td> </tr> <tr> <td>L5</td> <td>C5</td> <td>4</td> </tr> </table>	P X	C	Risk	L5	C5
P X	C	Risk					
L5	C5	4					

As stated in the table above, the project does not require a specific Groundwater Management Plan as the likelihood of impacting on groundwater during the works are low. As such, management of any groundwater encountered during the works is to be managed in accordance with Section 7 of SM CEMF:

(Uncontrolled when printed)

- Any groundwater discharge will be managed in accordance with the Sydney Metro – Water Discharge or Reuse Procedure, the Southwest Metro – Dulwich Hill, Campsie and Punchbowl Station Upgrades Soil and Water Management Plan and Downer’s Water Discharge Management Standard (DG-ZH-ST064):
 - For water release from sediment ponds, trenches, excavations and bunds a water release permit using Downer’s Water Release Permit (DG-ZH-FM064.1) will be issued prior to any manual water release.
 - In the absence of discharge locations, an appropriate disposal method and location based on the results of analysis, that prevents pollution of local and regional groundwater and surface water resources, is to be selected in consultation with Sydney Metro and/ or regulator.

- Follow the flowchart – Downer’s Working On or Near Water Procedure (DG-ZH-PR136)



Procedure 3: Air Quality

Impact: Minimal impact expected due to the small area of disturbance associated with the works.

Objectives	<ul style="list-style-type: none"> To comply with contractual and legislative requirements in relations to the management of air quality Minimise gaseous and particulate pollutant emissions from Construction activities as far as feasible and reasonable Identify and control potential dust and air pollution sources. 								
Targets	<ul style="list-style-type: none"> No dust impacting on offsite activities or surrounding residences No release of contaminants, (odour, smoke etc.) into the air. 								
Legal, Contractual and Other Requirements	<ul style="list-style-type: none"> Planning consent conditions – SSI 8256 CEMF Section 16 <i>Protection of the Environment Operations Act 1997</i> <i>Protection of the Environment Operations (Clean Air) Regulation 2010</i> 								
Site specific planning / approval conditions / licence conditions	<ul style="list-style-type: none"> CoA E2 Mitigation measures committed in the EIS & SPIR 								
Potential impacts and Initial Risk Rating Refer to Appendix 3 for Risk Matrix	Potential impact	Initial Risk Rating							
		P X	C						
	Dust or plant emission impacting on the receiving environment and human health	L3	C5	12					
	Abrasive blasting waste emissions impacting on the receiving environment and human health	L3	C4	16					
Odour from works causing disturbance to local receivers	L4	C5	7						
Controls (means and resources)	Commitments & Mitigation Measures outlined in the EIS / SPIR								
	<table border="1"> <thead> <tr> <th data-bbox="472 1042 1429 1085">Mitigation Measure</th> <th data-bbox="1429 1042 1727 1085">Applicable to the Project</th> <th data-bbox="1727 1042 2036 1085">Responsible</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 1085 1429 1206">CoA E2 - In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during the Construction and Operation of the CSSI.</td> <td data-bbox="1429 1085 1727 1206">Applicable</td> <td data-bbox="1727 1085 2036 1206">Environmental Manager Construction Manager Site Supervisor</td> </tr> </tbody> </table>	Mitigation Measure	Applicable to the Project	Responsible	CoA E2 - In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during the Construction and Operation of the CSSI.	Applicable	Environmental Manager Construction Manager Site Supervisor		
	Mitigation Measure	Applicable to the Project	Responsible						
CoA E2 - In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during the Construction and Operation of the CSSI.	Applicable	Environmental Manager Construction Manager Site Supervisor							
Site Specific Mitigation & Control Measures developed as part of this CEMP: The following are the minimum general control measures to be implemented on the project, however additional control measures may be required following the completion of the Construction process procedure/work method statement for the proposed activity.									
<table border="1"> <thead> <tr> <th data-bbox="472 1313 1727 1356">Mitigation Measures</th> <th data-bbox="1727 1313 2036 1356">Responsible</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 1356 1727 1356"></td> <td data-bbox="1727 1356 2036 1356"></td> </tr> </tbody> </table>	Mitigation Measures	Responsible							
Mitigation Measures	Responsible								

All plant and machinery would be fitted with emission control devices complying with relevant Australian Standards.	Construction Manager Site Supervisor
Machinery would be turned off when not in use and not left to idle for prolonged periods.	Site Supervisor
Machinery and plant that will be kept on site will be serviced as per manufactures specifications.	Site Supervisor
Vehicle movements would be limited to designed entries and exits, haulage routes and parking areas.	Construction Manager Site Supervisor
Dust generation would be monitored visually, and where required, dust control measures such as water spraying would be implemented to control the generation of dust.	Environmental Manager Site Supervisor
Materials transported to and from the site would be covered to reduce dust generation in transit.	Site Supervisor
Access points would be inspected to determine whether sediment is being transferred to the surrounding road network. If required, sediment would be promptly removed from roads to minimise dust generation.	Environmental Manager Site Supervisor
Provide shaker grids, rumble strip or equivalent stabilisation at site egress points.	Site Supervisor
Remove mud from haul vehicles prior to entering public roads.	Site Supervisor
Stabilisation of any exposed surfaces as soon as practicable, including implementation of final landscaping as early as possible.	Construction Manager Site Supervisor
Shade cloth would be fastened to the perimeter fence on the project site, where practicable, to minimise dust transported from the site during Construction.	Construction Manager Site Supervisor
Daily inspections and regular surveillance would be undertaken to identify any vehicles, plant or equipment that is causing visible emissions. If any defective vehicles, plants or equipment are identified, operation of this machinery would cease, and service/maintenance would be undertaken.	Site Supervisor
Works (including the spraying of paint and other materials) would be suspended during strong winds or in weather conditions where high levels of dust or airborne particulates are likely.	Construction Manager Site Supervisor
Stockpiles will be maintained and contained appropriately, which could include covering or regular watering to minimise dust.	Construction Manager Site Supervisor
Provision of Water tankers where necessary.	Construction Manager Site Supervisor

	Cover haul vehicles loads & ensure tail gates are closed when operating on public roads.	Construction Manager Site Supervisor		
	Provide awareness training in the need to minimise dust.	Environmental Manager		
	Note any odours during site inspections, particularly from any effluent tanks, and apply de-odourising agents as required.	Environmental Manager Construction Manager Site Supervisor		
Responsibilities	<ul style="list-style-type: none"> The Site Manager to implement the requirements of this procedure Site Manager and Environmental Manager (or delegate) are to inspect the works at regular intervals. 			
Timeframe	Duration of Construction			
Monitoring and Reporting	<ul style="list-style-type: none"> Weekly inspections. Incidents or complaints to be recorded on form Environmental Incident and Complaint Report 			
Potential impacts and Residual Risk Rating Refer to Appendix 3 for Risk Matrix	Potential impact	Residual Risk Rating		
		P X	C	Risk
	Dust or plant emission impacting on the receiving environment and human health	L4	C5	7
	Abrasive blasting waste emissions impacting on the receiving environment and human health	L4	C4	7
	Odour from works causing disturbance to local receivers	L5	C5	4

In addition to the above table and to comply with the Downer EMS, Downer’s Air Quality Management Standard (DG-ZH-ST070) defines the requirements to be met to manage air emissions from all activities conducted at fixed facilities and construction worksites. Discharges to air such as fumes, dust and odour can contaminate the environment and be a nuisance to communities and animals.

Downer will take all reasonable and practicable measures to manage air emissions from all activities conducted on site. Controls for emissions to air will be addressed using the following hierarchy.

Table 7. Hierarchy of air quality management controls

Control Hierarchy	Example
Avoid	During the design and planning phase, eliminate the need for high dust generating activities. Using technology that avoids or minimises air emissions (i.e. newer plant)
Reduce	Treating air emissions before release / utilising water misters and dust suppression techniques to suppress dust and or bind it.
Manage	Limiting dust-generating construction activities during windy conditions. Monitoring emissions for changing conditions during works.

Diesel exhaust and emissions will be managed with proper maintenance and tuning of engines to manufacturer’s specifications. This includes Catalytic converters and exhaust filters; Correct fuel specification; Limiting idling time; Avoiding overloading; Appropriate height of discharge above ground level, Vehicles operated in accordance with Downer’s Vehicles and Mobile Plant Standard (DG-ZH-ST057).

Procedure 4: Waste and Spoil

Impact: Minimal impact expected due to the small amount of waste generated and spoil to be handled.

<p>Objectives</p>	<ul style="list-style-type: none"> • Minimise spoil generation where possible • The project will mandate 100% reuse or recycling (on or off site) of usable spoil • Spoil will be managed with consideration to minimising adverse traffic related issues • Spoil will be managed to avoid contamination of land or water • Spoil will be managed with consideration of the impacts on residents and other sensitive receivers • Site contamination will be effectively managed to limit the potential risk to human health and the environment • Minimise waste throughout the project life cycle • Waste management strategies will be implemented in accordance with the <i>Waste Avoidance and Resource Recovery Act 2001</i> management hierarchy as follows: <ul style="list-style-type: none"> ○ Avoidance of unnecessary resource consumption ○ Resource recovery (including reuse, reprocessing, recycling and energy recovery) ○ Disposal. 					
<p>Targets</p>	<ul style="list-style-type: none"> • 100% reuse or recycling of usable spoil. • 90% recycling target (in accordance with REMM WM2) • Waste tracking to occur throughout project and records to be maintained • The principles of the waste management hierarchy will be adopted. 					
<p>Legal, Contractual and Other Requirements</p>	<ul style="list-style-type: none"> • Planning consent conditions – SSI 8256, CoA C3(c) • CEMF Section 6 and Section 17 • <i>Protection of the Environment Operations Act 1997</i> • <i>Protection of the Environment Operations (Waste) Regulation 2014</i> 					
<p>Site specific planning / approval conditions / licence conditions</p>	<p>CoA – E73 to E76 REMM – WM1 to WM7 Mitigation measures committed in the EIS & SPIR</p>					
<p>Potential impacts and Initial Risk Rating Refer to Appendix 3 for Risk Matrix</p>	<p>Potential impact</p>	<p>Initial Risk Rating</p> <table border="1" data-bbox="1749 1123 2033 1166"> <tr> <td>P X</td> <td>C</td> <td>Risk</td> </tr> </table>		P X	C	Risk
P X	C	Risk				
<p>Controls (means and resources)</p>	<p>Commitments & Mitigation Measures outlined in the EIS / SPIR</p> <table border="1" data-bbox="495 1262 2033 1332"> <tr> <td data-bbox="495 1262 1429 1332"> <p>Mitigation Measure</p> </td> <td data-bbox="1429 1262 1727 1332"> <p>Applicable to Project Locality</p> </td> <td data-bbox="1727 1262 2033 1332"> <p>Responsible</p> </td> </tr> </table>			<p>Mitigation Measure</p>	<p>Applicable to Project Locality</p>	<p>Responsible</p>
<p>Mitigation Measure</p>	<p>Applicable to Project Locality</p>	<p>Responsible</p>				

	<p>CoA E73 - Any items or infrastructure that are salvageable must be identified in the relevant CEMP Sub-plan (Condition C3). Note: reuse of items may include signal boxes, indicators, ballast or other rail infrastructure. These items should be offered to Sydney Trains or reuse.</p>	<p>Applicable</p>	<p>Construction Manager Site Supervisor</p>
	<p>CoA E74 - The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the <i>Protection of the Environment Operations Act 1997</i>, under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>, and orders or exemptions made under the regulation.</p>	<p>Applicable</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>
	<p>CoA E75 - Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i>, or to any other place that can lawfully accept such waste.</p>	<p>Applicable</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>
	<p>CoA E76 - All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.</p>	<p>Applicable</p>	<p>Environmental Manager Construction Manager Site Supervisor</p>
	<p>REMM WM1 - Detailed design would include measures to minimise excess spoil generation. This would include a focus on optimising the design to minimise spoil volumes, and the reuse of material on-site.</p>	<p>Applicable</p>	<p>Design Manager Sustainability Manager Environmental Manager Construction Manager</p>
	<p>REMM WM2 - A recycling target of at least 90 per cent would be adopted.</p>	<p>Applicable</p>	<p>Sustainability Manager Environmental Manager Construction Manager Site Supervisor</p>
	<p>REMM WM3 - Spoil would be managed in accordance with the spoil management hierarchy.</p>	<p>Applicable</p>	<p>Sustainability Manager Environmental Manager Construction Manager Site Supervisor</p>
	<p>REMM WM4 - Target 100 per cent reuse of reusable spoil.</p>	<p>Applicable</p>	<p>Sustainability Manager Environmental Manager Construction Manager Site Supervisor</p>

REMM WM5 - Construction waste would be minimised by accurately calculating materials brought to the site and limiting materials packaging.	Applicable	Sustainability Manager Environmental Manager Construction Manager Site Supervisor
REMM WM6 - All waste would be assessed, classified, managed and disposed of in accordance with the Waste Classification Guidelines (EPA, 2014).	Applicable	Environmental Manager Construction Manager Site Supervisor
REMM WM7 - Waste segregation bins would be located at various locations within the project area, if space permits, to facilitate segregation and prevent cross contamination.	Applicable	Sustainability Manager Environmental Manager Construction Manager Site Supervisor

Site Specific Mitigation & Control Measures developed as part of this CEMP:

The following are the minimum general control measures to be implemented on the project, however additional control measures may be required following the completion of the Construction process procedure/work method statement for the proposed activity.

Mitigation Measures	Responsible
Minimise spoil generation where possible by undertaking a cut/fill balance exercise	Construction Manager Site Supervisor
Minimise spoil generation where possible by not over-excavating	Construction Manager Site Supervisor
Minimising adverse traffic related issues associated with spoil movement by primarily keeping any movements to within the corridor and by only using approved haulage routes under the Construction Traffic Management Plan	Construction Manager Site Supervisor
Spoil will be managed to avoid contamination of land or water by segregating soils known to contain contaminants	Environmental Manager Construction Manager Site Supervisor
Spoil will be managed to avoid contamination of land or water by implementing appropriate erosion and sedimentation controls, in particular by covering stockpiles where practicable	Environmental Manager Construction Manager Site Supervisor

	Spoil will be managed to avoid contamination of land or water by avoiding overland flow paths and known flood zones as storage areas	Environmental Manager Construction Manager Site Supervisor
	Spoil will be managed with consideration of the impacts on residents and other sensitive receivers by selecting laydown areas that are as far away from receivers as possible	Environmental Manager Construction Manager Site Supervisor
	Spoil will be managed with consideration of the impacts on residents and other sensitive receivers by using approved haulage routes under the Construction Traffic Management Plan	Construction Manager Site Supervisor
	Site contamination will be effectively managed to limit the potential risk to human health and the environment by segregating contaminated spoil	Environmental Manager Construction Manager Site Supervisor
	Site contamination will be effectively managed to limit the potential risk to human health and the environment by implementing the unexpected contamination finds procedure (refer to Appendix B of the SWMP).	Environmental Manager Construction Manager Site Supervisor
	Implement the mitigation measures within the Soil and Water Management Plan and other procedures within this CEMP.	Environmental Manager Construction Manager Site Supervisor
	Maintain a waste tracking register, including a copy of all waste docketts	Sustainability Manager
	Waste will be lawfully disposed of to a licenced facility	Environmental Manager Construction Manager Site Supervisor
	Any materials sent from the Project sites to another project site will comply with the NSW EPA Resource Recovery Exemptions. Appropriate testing and reporting in accordance with the Resource Recovery Exemption will be undertaken by an Environmental Consultant. All records will be kept on file and provided to the receiver.	Environmental Manager Construction Manager
	A spoil import and export form will be completed for any spoil coming to and leaving from the site.	Environmental Manager Construction Manager
Responsibilities	<ul style="list-style-type: none"> The Site Manager to implement the requirements of this procedure. Site Manager and Environmental Manager (or delegate) are to inspect the works at regular intervals. 	
Timeframe	<ul style="list-style-type: none"> Duration of Construction until all Principal Contractor waste obligations are met 	

Monitoring and Reporting	<ul style="list-style-type: none"> • Skips monitored visually by the Site Manager on a daily basis. • Weekly inspections. • Incidents or complaints to be recorded on form Environmental Incident and Complaint Report • Waste disposal records to be recorded in Principal Contractor’s Waste Register. 			
Potential impacts and Residual Risk Rating Refer to Appendix 3 for Risk Matrix	Potential impact	Residual Risk Rating		
		P X	C	Risk
	Inappropriate waste disposal impacting on environmental receivers	L4	C5	7

In addition to the above table and to comply with the Downer EMS, Waste and Spoil will be managed in accordance with Downer’s 10 Environmental Principles (DG-ZH-PN002) of which the following are relevant:

- EP4 – Store and secure chemical substances in a bunded area;
- EP5 – Reduce, Reuse, Recycle to minimise waste;
- EP9 – Report all environmental hazards and incidents; and
- EP10 – Keep every site, secure, tidy and housekeeping maintained

Downer’s Waste Management Standard (DG-ZH-ST063) applies to the identification and management of waste in accordance with the Waste Hierarchy with the aim of creating a circular economy encouraging life cycle thinking.

For job specific tasks refer to the following Zero Harm compliance guidelines:

- Management of Waste (DG-ZH-CG063);
- Waste Minimisation (DG-ZH-CG064);
- Re-use and Recycling (DG-ZH-CG065); and
- Waste Treatment (DG-ZH-CG066).

All waste streams must be segregated and classified in accordance with relevant jurisdiction regulations and guidelines. In some instances, chemical analysis will be required to determine the classification of the waste, e.g. asbestos contained in fill material. For further information refer to Downer’s Fill Material Management Standard (DG-ZH-ST068.1) and Downer’s Asbestos Management Standard (DG-ZH-ST086).

The management of waste must be accordance with the waste management hierarchy.



Before commencing any work, determine the sources of waste and management requirements and include them as part of the Project's Work Health and Safety (Zero Harm) Management Plan and or referenced within Appendix E of this CEMP.

Basic information to consider includes:

- identification and classification of all waste streams
- assessment of waste streams based on the waste hierarchy
- estimation of waste types and quantities to be generated, optionally using DG-ZH-FM063.2 Waste Estimation Record to record this data
- waste segregation, handling and storage arrangements
- waste transport methods and disposal locations
- permits/ licences required to store, transport or dispose of waste; and
- regulated waste transporters and receiving facilities licenses.

Downer reports and captures waste data into the Downer Environmental Data Reporting System (Envizi). This information can be recorded by completing Downer's Envizi Facility Details Record (DG-ZH-FM077.1) and submitting to an authorised person who can enter the data into Envizi.

Appendix F: Sydney Metro Environmental Incident and Non-compliance Reporting Procedure

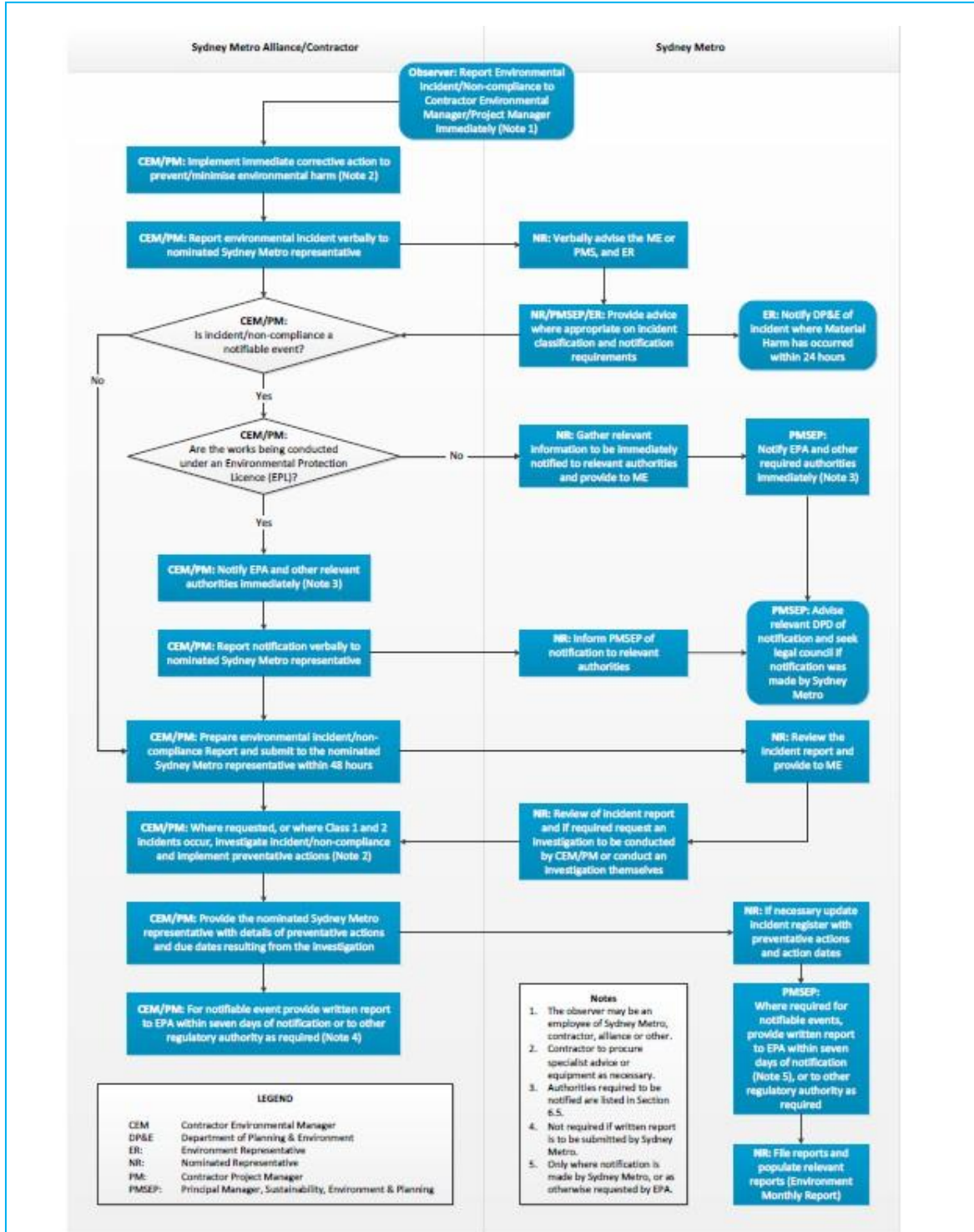
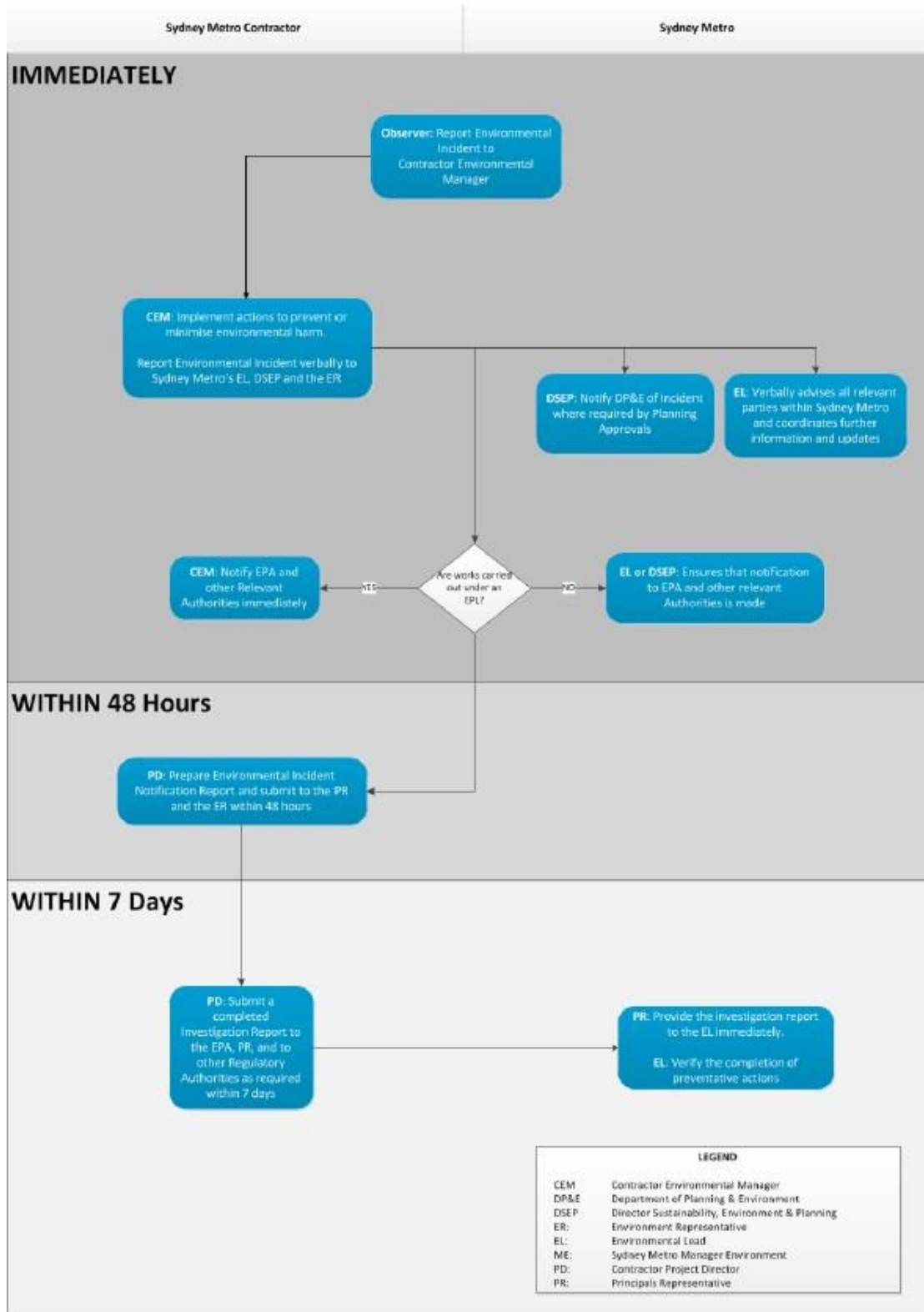


Figure 1: Environment Incident Classification & Reporting Procedure overview

Appendix F(a): Sydney Metro Environmental Incident Notification Process for Class 1 and 2 Incidents



Appendix F(b): Sydney Metro Environmental Incident and Non-Compliance Report Template

Environmental Incident and Non-Compliance Report Template

Record only factual information that you know to be correct. Do not make assumptions, be succinct and avoid speculation.

Section 1: General Details			
Contractor:			
Site:			
TfNSW ID Code: (If known)		Contractor reference: (If known)	
Date of incident/ non-compliance:		Time of incident/ non-compliance:	
Date of notification:		Time of notification:	
Method of notification:			
Notification received by – Name:			
Notification received by – Position:			
Incident Classification:		Duration	
<input type="checkbox"/> Non-compliance only (complete Section 6 and 7 only)	<input type="checkbox"/> Class 3	<input type="checkbox"/> Short term (less than 1 week)	<input type="checkbox"/> Medium term (less than 3 months)
<input type="checkbox"/> Class 2	<input type="checkbox"/> Class 1	<input type="checkbox"/> Long term (greater than 3 months)	<input type="checkbox"/> Permanent
Incident Properties: (Tick as many as appropriate, where significant off-site impacts on people or the biophysical environment occurs this incident is also notifiable to DP&E)		<input type="checkbox"/> Notifiable event (also complete Section 4)	
		<input type="checkbox"/> Non-compliance (also complete Section 6)	
Incident type (choose one):			
<input type="checkbox"/> Air & Dust (e.g. dust or odour emission, excessive exhaust from plant or equipment)	<input type="checkbox"/> Unauthorised Works (e.g. work being carried out prior to approval or permits being obtained)	<input type="checkbox"/> Noise & Vibration (e.g. exceedances of noise and vibration limits)	
<input type="checkbox"/> Flora and Fauna (damage/harm to species /habitat/ecological community)	<input type="checkbox"/> Water Pollution (e.g. discharge to any onsite or offsite waterway)	<input type="checkbox"/> Traffic, Transport & Access (e.g. Issues regarding the management of traffic flow)	
<input type="checkbox"/> Land Contamination (e.g. events where harmful materials escape into soil)	<input type="checkbox"/> Community (e.g. events causing impacts on community amenity/property)	<input type="checkbox"/> Waste & Hazardous Materials (e.g. disposal causing environmental harm)	
<input type="checkbox"/> Systems & Documentation (e.g. Non-Compliance with project approval, or a CEMP requirement)	<input type="checkbox"/> Heritage (e.g. damage/disturbance to heritage item/object/place)		

Appendix G: Noise and Vibration Management Plan

Standalone sub plan – refer to document: SWM-DCP-NVMP-001 Noise and Vibration Management Plan

Appendix H: Soil and Water Management Plan

Standalone sub plan – refer to document: SWM-DCP-SWMP-001 Soil and Water Management Plan

Appendix I: Heritage Management Plan

Standalone sub plan – refer to document: SWM-DCP-HMP-001 Heritage Management Plan

Appendix J: Indicative Training Matrix

This matrix is indicative and shall be a live document based on scope and risk applicable with each four week lookahead.

Sydney Metro Packages 5 & 6 Station Upgrades Environment Training Matrix
Rev 1: 11/08/2021

Completed
 Planned
 Not completed

Type / Method of Training	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21
Downer Environmental and Sustainability Induction												
Spill Response												
Noise and vibration												
Dewatering and erosion and sediment control												
Unexpected finds including asbestos & heritage												
Water and contamination management												
Flora and fauna risk												
Air quality												



Appendix K: Indicative Audit Schedule (Template)

SECTION 1 – GENERAL							
Audit Schedule Level:	Sydney Metro Packages 5 and 6 Station Upgrades	Sub-Level:	Hurlstone Park, Belmore and Wiley Park Station Upgrades	Date created	30/03//2021	Rev 0	
Prepared By:	Ryan O'Leary	Position:	Senior Environment and Sustainability Advisor	Date updated			
SECTION 2 – COLOUR LEGEND							
<i>Proposed = Required timing, Scheduled = Confirmed date with Auditee, Complete = Audit undertaken, Overdue = Proposed date or Scheduled date has passed current date and not rescheduled.</i>				PROPOSED	SCHEDULED	COMPLETE	OVERDUE/ CANCELLED
<i>Internal Audits are prioritised based on a risk assessment that includes an appreciation of factors including the following: Safety: including Critical risks; Number of incidents, Relationship with regulatory contact and License conditions. Environment: Number of incidents, License conditions, Aspects and impacts, critical risks Quality: including Number of NCR's, Supply - On time delivery, Capacity and capability to specification Sustainability: including social, environmental and economic aspects as specified in TfNSW SDGs Other: including Financial risk to the business, Client feedback, Contract and Certification requirements</i>				RISK RATING			
				LOW (L)	MEDIUM (M)	HIGH (H)	
SECTION 3 – MANAGEMENT SYSTEM & INTERNAL AUDITORS			AUDIT REQUIREMENTS		PROJECTS AUDITED ON		AUDIT TYPE
<i>Downer Environment / Sustainability</i>	<i>Downer Quality</i>	<i>Downer Safety/Zero Harm - ZH</i>	<i>Source requirement</i>	<i>Acronym</i>	HURLSTONE PARK, BELMORE AND WILEY PARK		INTERNAL = INT
Gareth O'Brien (GOB) Ryan O'Leary (ROL) Mark Trethewey (MT) James Allsop (JA)	TBA	TBA	Sydney Metro Standard Requirements (Works Contract)	SMSRs			EXTERNAL = EXT
Sydney Metro / Independent Enviro / Sustainability	TfNSW Quality	TfNSW Safety	ISO 14001:2015	EMS			
Sydney Metro – James Wilkinson	TBA	TBA	ISO 18001:2007	SMS			
			ISO 9001: 2015	QMS			
			TfNSW Sustainable Design Guidelines. V.4.0	TfNSW SDG			
			Sustainability Management Plan	SMP			

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				LOW (L)	MEDIUM (M)	HIGH (H)	
SECTION 3 – MANAGEMENT SYSTEM & INTERNAL AUDITORS			AUDIT REQUIREMENTS		PROJECTS AUDITED ON		AUDIT TYPE



<table border="1"> <tr> <th>Downer Environment / Sustainability</th> <th>Downer Quality</th> <th>Downer Safety/Zero Harm - ZH</th> </tr> <tr> <td>Gareth O'Brien (GOB) Ryan O'Leary (ROL) Abe Sharman (AS)</td> <td>TBA</td> <td>TBA</td> </tr> <tr> <td>Sydney Metro / Independent Enviro / Sustainability</td> <td>TfNSW Quality</td> <td>TfNSW Safety</td> </tr> <tr> <td>Sydney Metro – James Wilkinson</td> <td>TBA</td> <td>TBA</td> </tr> </table>			Downer Environment / Sustainability	Downer Quality	Downer Safety/Zero Harm - ZH	Gareth O'Brien (GOB) Ryan O'Leary (ROL) Abe Sharman (AS)	TBA	TBA	Sydney Metro / Independent Enviro / Sustainability	TfNSW Quality	TfNSW Safety	Sydney Metro – James Wilkinson	TBA	TBA	<table border="1"> <tr> <th>Source requirement</th> <th>Acronym</th> </tr> <tr> <td>Sydney Metro Standard Requirements (Works Contract)</td> <td>SMSRs</td> </tr> <tr> <td>ISO 14001:2015</td> <td>EMS</td> </tr> <tr> <td>ISO 18001:2007</td> <td>SMS</td> </tr> <tr> <td>ISO 9001: 2015</td> <td>QMS</td> </tr> <tr> <td>TfNSW Sustainable Design Guidelines. V.4.0</td> <td>TfNSW SDG</td> </tr> <tr> <td>Sustainability Management Plan</td> <td>SMP</td> </tr> </table>		Source requirement	Acronym	Sydney Metro Standard Requirements (Works Contract)	SMSRs	ISO 14001:2015	EMS	ISO 18001:2007	SMS	ISO 9001: 2015	QMS	TfNSW Sustainable Design Guidelines. V.4.0	TfNSW SDG	Sustainability Management Plan	SMP	<table border="1"> <tr> <td>HURLSTONE PARK, BELMORE AND WILEY PARK</td> <td>INTERNAL = INT</td> </tr> <tr> <td></td> <td>EXTERNAL = EXT</td> </tr> </table>		HURLSTONE PARK, BELMORE AND WILEY PARK	INTERNAL = INT		EXTERNAL = EXT
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No.	Audit Number / Subject area	Project/Location/Activity	Audit on	Audit by	Audit Type	Audit Requirements	Risk	Apr 2021	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan 2022	Feb	Mar	Apr	May	Jun	Jul
1.	CAT 1	AUDITS FROM IPD - DOWNER	SM P5&6		EXT																		
	ISO	ISO compliance	SM P5&6		EXT	Full corporate ISO	M																
2.	CAT 2	ASSURANCE AUDIT	SM P5&6		EXT																		
	Sustainability / Environment / Community	Quarterly EMS assurance audit	SM P5&6	GOB / ROL	INT	CEMP and full EMS	M																
3.	CAT 3	COMPLIANCE AUDIT ON MANAGEMENT PLANS	SM P5&6		INT																		
	Sustainability / Environment / Community	6-monthly review of all Environment and Sustainability Management Plans	SM P5&6	GOB / ROL / MT / JA	INT	CEMP & SMP	L																
4.	CAT 4	SUBCONTRACTORS/SUPPLIER AUDIT			INT																		
	Sustainability / Environment / Community	Waste end-location (e.g. Bingo, Suez, etc.)	SM P5&6	GOB / ROL / MT / JA	INT	EMS / SMP (6-monthly)	L																
	Quality / Sustainability	Steel subcontractor	SM P5&6	GOB / Quality	INT	EMS / SMP	L																
5.	CAT 5	COMMERCIAL AUDITS (If Required)	SM P5&6		INT																		
6.	CAT 6	AUDIT / INSPECTION BY CLIENT / AEO / ISPs	SM P5&6		EXT																		
	Environment and Sustainability	Environment and Sustainability audit	SM P5&6	Sydney Metro to arrange	EXT	SMSRs / SMP	L																
7.	CAT 7	INDEPENDENT REVIEWS	SM P5&6		EXT																		
	Environment and Sustainability	Monthly Sustainability report review	SM P5&6	Sydney Metro	EXT	SMSRs / SMP	L																

