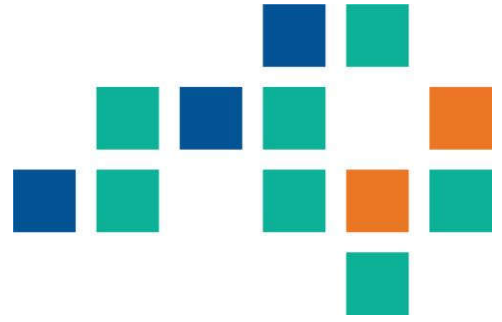

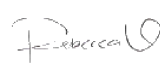




INTERNAL



# Construction Environmental Management Plan EnergyConnect (NSW - Western Section) Stage 2 45860-HSE-PL-D-0017

REV	DATE	GENERAL DESCRIPTION	PREPARED	REVIEWED	VERIFIED	VERIFIED	APPROVED
0	01/03/2022	Issued for DPE	M.Lee	R.Walker-Edwards	G.Crighton	JL.Barrenechea	D.Whatmough
1	14/06/2022	Issued for DPE	M.Lee	R.Walker-Edwards	A.Boyd	JL.Barrenechea	D.Whatmough
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Revision History	
Rev.	Detailed Description
A	Issued for internal review including aspects from <i>EnergyConnect (NSW – Western Section) Submissions Report</i>
B	Issued for Transgrid review
C	Updated following receipt of draft conditions of Approval (v2)
D	Updated following receipt of Transgrid’s comments and to address the Infrastructure Approval
E	Updated following receipt of Transgrid’s comments
F	Updated following receipt of Environmental Representative’s comments
0	Changed revision numbering from Rev F to Rev 0
1	Updated following receipt of the Department’s comments.
2	Updated following receipt of the Department’s comments received on 5 July 2022.

Key Document Stakeholders
To be communicated with during reviews and revisions of this document

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## Abbreviations

Acronym	Definition
Amendment Report	<i>EnergyConnect (NSW – Western Section) Amendment Report</i>
AS/NZ	Australian Standard/New Zealand Standard
BC Act	<i>Biodiversity Conservation Act 2016</i>
CCS	Community Communication Strategy
CEMP	Construction Environmental Management Plan
CSSI	Critical State significant infrastructure
DAWE	Department of Agriculture, Water and the Environment
DPE or Department	Department of Planning and Environment
DPIE	Department of Planning, Industry and Environment, now known as Department of Planning and Environment
EECs	Endangered ecological communities
EIA	Environmental Impact Assessment
EIS	<i>EnergyConnect (NSW – Western Section) Environmental Impact Statement</i>
EMS	Environmental Management System
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPL	Environment Protection Licence
ER	Environmental Representative
FMEA	Failure mode and effects analysis
HAZID	Hazard Identification
HAZOP	Hazard and operability
HSSE	Health, Safety, Security and Environment
HSSE Manual	Health, Safety, Security and Environment Management Manual
JHA	Job hazard analysis
LGA	Local Government Area
MNES	Matters of National Environmental Significance
NCR	Non-conformance report
NEM	National Electricity Market
NP&W Act	<i>National Parks and Wildlife Act 1974</i>
NSW	New South Wales
PESCP	Progressive erosion and sediment control plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
project, the	EnergyConnect (NSW - Western Section)
Response to DPIE Request for Information	The 'additional information letter dated 10 August 2021' in the definition section of the Infrastructure Approval; document is also titled <i>EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions</i>
RMMs	Revised mitigation measures
ROIs	Road occupancy licences
SA	South Australia

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<b>Acronym</b>	<b>Definition</b>
SAPs	Sensitive area plans
SecureEnergy	Elecnor and Clough Projects Australia Pty Ltd have formed the SecureEnergy Joint Venture (SecureEnergy). SecureEnergy is the contractor who will be carrying out the project on behalf of Transgrid.
SSI	State significant infrastructure
Submissions Report	<i>Energy Connect (NSW – Western Section) – Submissions Report</i>
TBD	To be determined
TfNSW	Transport for NSW
Vic	Victoria
WM Act	<i>Water Management Act 2000</i>
WMS	Work method statement

## 1 Introduction

### 1.1 Context

Transgrid and ElectraNet will deliver a high voltage electricity interconnector between the power grids of South Australia (SA) and New South Wales (NSW), with an added connection to Victoria, known collectively as EnergyConnect. EnergyConnect will reduce the cost of providing secure and reliable electricity transmission between NSW, SA and north-west Victoria in the near term and facilitate the transition of the energy sector across the National Electricity Market (NEM) to low emission energy sources.

Transgrid is responsible for the portions of EnergyConnect within NSW, which includes the construction of transmission line from the NSW/SA border to Buronga, expansion of the Buronga substation, construction of transmission line from Buronga substation to the NSW/Victoria connect to the existing Red Cliff substation, and construction of transmission line from Buronga to Wagga Wagga.

Elecnor and Clough Projects Australia Pty Ltd have formed SecureEnergy for the purpose of the design and construction of EnergyConnect.

### 1.2 Background

On 29 August 2019 the NSW Minister for Planning and Public Spaces declared EnergyConnect a critical State significant infrastructure (CSSI) under the *Environmental Planning and Assessment Act 1979* (EP&A Act) on the basis that it is critical to the State for environmental, economic or social reasons. Within NSW, EnergyConnect is therefore subject to assessment under Part 5, Division 5.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Transgrid have two environmental planning approval applications for the sections within NSW:

- EnergyConnect (NSW – Western Section) – SA/NSW border to Buronga and Buronga to the NSW/Victorian border; and
- EnergyConnect (NSW – Eastern Section) – Buronga to Wagga Wagga.

A referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was submitted on 27 May 2020. The Australian Department of Agriculture, Water and the Environment (DAWE) determined the project to be a controlled action on 26 June 2020 and thus, it would be assessed using the bilateral assessment process. As such, the project also requires approval from the Australian Minister for the Environment under the EPBC Act.

The *EnergyConnect (NSW – Western Section) Environmental Impact Statement* (EIS) was prepared for the project in October 2020 and was placed on public exhibition from 30 October 2020 to 10 December 2020. A total of 20 submissions were received, with 15 from government agencies, three from organisations and two from the public.

The *EnergyConnect (NSW – Western Section) Submissions Report* (Submissions Report) was prepared for the project in response to the submissions received during the public exhibition of the EIS. The Submissions Report was finalised on 14 April 2021.

Transgrid also prepared a separate *EnergyConnect (NSW – Western Section) Amendment Report* (Amendment Report) to document design changes and additional environmental assessment undertaken since exhibition of the EIS. The Amendment Report was also finalised on 14 April 2021.

On 7 May 2021, Department of Planning, Industry and Environment (DPIE) requested additional information (*EnergyConnect (NSW – Western Section)(SSI-10040) Request for Additional Information*) to assist with the assessment of the project. In response Transgrid prepared and provided the *EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions* (Response to DPIE Request for Information) (May 2021). The response provided to DPIE included a *Revised Biodiversity Development Assessment Report*



(Revised BDAR) (August 2021) and the revised mitigation measures (RMMs) which are to be applied. The Response to DPIE Request for Information was dated 10 August 2021.

Approval for the project under the EP&A Act was granted by the NSW Minister for Planning and Public Spaces (Infrastructure Approval SSI 10040). Approval of the project will lapse if the project has not physically commenced the project within five years of the date the approval was granted. Approval for the project under the EPBC Act was granted by the Australian Minister for the Environment.

### **1.3 Scope**

This Construction Environmental Management Plan (CEMP) and the associated Stage 2 sub-plans have been prepared to describe the environmental management practices and procedures to be implemented for the construction of EnergyConnect (NSW – Western Section) (the project). Section 2.3 outlines the scope of works included in Stage 2.

Once approved, this CEMP and the relevant Stage 2 CEMP sub-plans will supersede the existing Stage 1 CEMP and Stage 1 sub-plans. Refer to Section 4.3.1 for further details on the sub-plans relevant to Stage 2. This plan does not address the operational phases of the project.

All construction personnel and sub-contractors will be required to undertake works in accordance with this CEMP and the management measures identified in any relevant site-specific documents.

### **1.4 Purpose**

This CEMP has been prepared to address the requirements of condition B1 to B6 of the Infrastructure Approval.

The purpose of this CEMP is to provide a structured approach to the management of environmental issues during construction of the project. This plan defines the environmental management principles, processes, procedures, systems, tools, and templates implemented for use throughout the duration of construction of the project with the aim to prevent and, where prevention is not reasonable and feasible, minimise environmental harm during the construction phase.

In particular, this CEMP:

- describes the project and activities to be undertaken;
- describes the environmental management system and documents that will be implemented;
- states the objectives and targets for the project;
- provides management measures to minimise environmental impacts;
- describes the roles and responsibilities of personnel in relation to environmental management;
- outlines a monitoring regime during construction; and
- supports the project team in completing the requirements of the project.

### **1.5 Preparation of this plan**

In accordance with condition B6 of the Infrastructure Approval, this plan has been prepared by a suitably qualified and experienced person. This plan was prepared by Martin Lee and reviewed by Rebecca Walker-Edwards. This CEMP will be implemented for the duration of construction of Stage 2 of the project.

### **1.6 Consultation**

The Infrastructure Approval requires the CEMP sub-plans to be prepared in consultation with relevant government agencies and stakeholders. The CEMP sub-plans that require consultation with the relevant stakeholders are marked with a letter 'C' as shown in Table 1.1 below.

**Table 1.1 - CEMP sub-plans that require consultation**

CEMP Sub-plan required under condition B2 of the Infrastructure Approval	Council	DPE Water	BCS	Heritage NSW	Aboriginal stakeholders	TfNSW
Noise and Vibration	C					
Soil and Water	C	C				
Biodiversity	C		C			
Heritage				C	C	
Traffic and Transport	C					C

In accordance with condition B3, the consultation records of the CEMP sub-plans listed under condition B2 will be provided and submitted to DPE with the relevant CEMP sub-plan.

In accordance with condition A7, consultation records of other approval documents that require consultation with an identified party will be submitted to DPE.

### 1.7 Submission and approval

In accordance with condition B5 of the Infrastructure Approval, the CEMP and CEMP sub-plans listed under condition B2 must be submitted and approved by the Secretary of Department of Planning, Industry and Environment (Planning Secretary) prior to the commencement of construction. The sub-plans may be submitted along with, or subsequent to, the submission of this CEMP.

The Stage 1 CEMP and CEMP sub-plans were submitted to DPE to seek approval for the commencement of Stage 1 works. This CEMP will be submitted for the Stage 2 works.

Stage 2 construction will not commence until the CEMP and CEMP sub-plans required under condition B2, or where staging is proposed the plans required for that stage, have been approved by the Planning Secretary.

Transgrid and/or SecureEnergy will comply with the requirements that arise from DPE's assessment of submitted plans, reports or audits.

Any document prepared in accordance with the Infrastructure Approval that must be prepared within a specified timeframe may be submitted within a later timeframe agreed with the Planning Secretary.

### 1.8 Distribution

SecureEnergy's Environmental Manager will coordinate the preparation, review and distribution, as appropriate, of the environmental documents. During construction, environmental documents will be stored electronically at the site office and will be available upon request to SecureEnergy's Environmental Manager.

This CEMP and CEMP sub-plans will be available to all personnel and sub-contractors via hard copy (if requested) or through the project document control system. Documents which are required to be made public will also be placed on the project website which is located at <https://www.projectenergyconnect.com.au>.

Registered copies will be distributed to the following:

- Project Director;
- Deputy Project Director;
- Construction Manager;
- Project HSSE Manager;

- Environmental Manager;
- Transgrid's Document Controller;
- Transgrid's Environmental Manager; and
- Environmental Representative.

### 1.9 Continuous improvement

The Plan-Do-Check-Act model will be applied to the continuous improvement process.

The Plan stage outlines the environmental objectives and the process to achieve the results. This is outlined through the Environmental Management System (EMS) described in Section 4 of this CEMP and supported by the Environmental Aspect and Impact Register provided within Appendix A3.

The Do stage focuses on the implementation of the EMS. Tools such as Work Packs and Work Method Statements described in Section 4.4 will be prepared to facilitate the implementation of the EMS. The Work Packs and Work Method Statements will be supported by drawings, forms and plans. The roles and responsibilities in carrying out the Do stage is provided in Section 4.9, while Section 6 outlines the various communication methods.

The Check stage comprises ongoing monitoring of the environmental management performance against the environmental objectives, for the purpose of identifying opportunities for improvement. This will be undertaken through regular environmental inspections, monitoring and auditing as described in Section 9.

The Act stage include undertaking the required actions in order to achieve the environmental objectives. Corrective and preventive actions are further described in Section 11. In addition to this, for any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Environmental Manager to coordinate the preparation of the revised documents, as further described in Section 1.10.

### 1.10 Updating the CEMP

In accordance with condition E1 of the Infrastructure Approval, SecureEnergy will review and, if necessary, revise the applicable strategies, plans or programs required by the Infrastructure Approval to the satisfaction of the Planning Secretary within three months of the following:

- submission of an incident report under condition E6 of the Infrastructure Approval;
- submission of an audit report under condition E11 of the Infrastructure Approval; or
- any modifications to the Infrastructure Approval.

Further to this, a document review process will be implemented to ensure that the environmental management practices and procedures which are to be implemented for construction as required by this CEMP, are updated as appropriate for the specific works that are occurring on-site. The document review process of the CEMP, sub-plans or other approval documents required under the Infrastructure Approval will be undertaken:

- in response to changes in the applicable legislation;
- where requested or required by DPE (condition A3);
- where deficiencies in the CEMP are identified in inspections, monitoring, or complaints;
- in response to project changes as described in Section 1.11; and
- annually where the above circumstances do not arise.

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 the Environmental Manager or their delegate to prepare the revised documents. The revised document will then be issued to the Project Director for internal approval and reviewed by Transgrid prior to re-issue.

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Minor changes to the CEMP, sub-plans or other approved documents required under the Infrastructure Approval may be required during delivery of the project. The Environmental Representative will consider and can approve minor changes to the CEMP, sub-plans or other approved documents. Minor changes involve updating the approved environmental documents that:

- are administrative in nature (e.g. staff and agency/authority name changes);
- do not increase impacts to nearby sensitive receivers;
- are consistent with the terms the Infrastructure Approval and the other documents approved by the Planning Secretary;
- are in response to audit findings relating to procedures and processes of the environmental management system;
- in response to changes in the applicable legislation such that the project complies with the amended legislative requirements; or
- any other changes or updates that considered minor by the Environmental Representative.

SecureEnergy will provide the documentation requested by the ER in order for the ER to perform their function.

Changes to the CEMP, sub-plans or other approved documents required under the Infrastructure Approval that are not defined as minor will be discussed with DPE to confirm the need for further review and approval. If required, the updated CEMP or sub-plans will be to the ER for endorsement prior to being submitted to DPE for review and approval.

As permitted by condition E2, with the agreement of the Planning Secretary, staged or updated strategies, plans or programs may be prepared without undertaking all of the consultation required under the applicable condition in the Infrastructure Approval.

### **1.11 Changes to the project**

The project may only be carried out:

- in compliance with the conditions of the Infrastructure Approval;
- in accordance with all written directions of the Planning Secretary;
- generally in accordance with the EIS; and
- generally in accordance with the Development Layout in Appendix 1 of the Infrastructure Approval.

In the event of an inconsistency, ambiguity or conflict between any of the documents listed in last two dot points above, the Infrastructure Approval and/or directions of the Planning Secretary, or the most recent document between those documents would prevail to the extent of the inconsistency, ambiguity or conflict.

Amendments or changes to the project may result from detailed design refinements or changed methodologies throughout construction.

Design and construction methodology changes will be communicated to SecureEnergy's Environmental Manager. The Environmental Manager will review the proposed change in consultation with the Transgrid Environmental Manager, where required, to determine whether it is consistent with the approved project.

Changes that are not consistent with the approved project will be discussed with DPE to confirm requirements. Transgrid as the Proponent will apply for any required formal modifications to the approved project.

If any changes to the project require changes to the CEMP, the Environmental Manager will identify the required changes and update the CEMP as required by Section 1.10.

## 2 Project description

### 2.1 Overview of EnergyConnect

Transgrid and ElectraNet are currently seeking approval for the proposed construction and operation of a new electrical interconnector and network support option between NSW and SA, with an additional connection to Red Cliffs in north-west Victoria. Collectively, the proposed interconnector is known as EnergyConnect.

The interconnector is aimed at reducing the cost of providing secure and reliable electricity transmission between NSW and SA in the near term, while facilitating the transition of the energy sector across the National Electricity Market to low emission energy sources.

The preferred option involves constructing a new high voltage electricity interconnector, approximately 900km long, between the power grids of SA (starting at Robertson) and NSW (finishing in Wagga Wagga). EnergyConnect comprises several sections (as shown on Figure 2.1), being:

- Victorian section, which extends from the NSW/Victoria border to an existing electrical facility at Red Cliffs;
- NSW sections including:
  - Western section (the subject area of this CEMP) which extends from:
    - the SA/NSW border (near Chowilla in SA) to Buronga;
    - Buronga to the NSW/Victoria border at Monak (near Red Cliffs in Victoria);
  - Eastern section, which extends from Buronga to Wagga Wagga; and
- SA section, which extends from Robertson to the SA/NSW border.

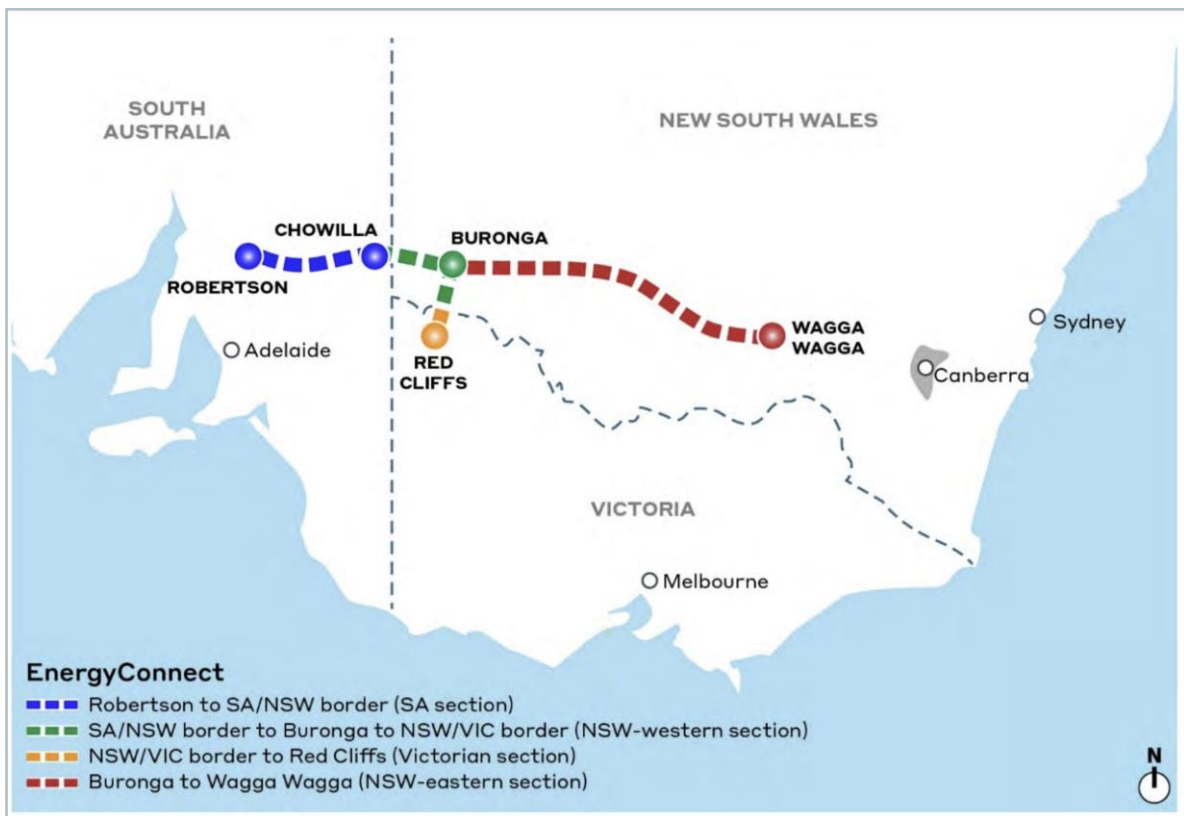


Figure 2.1 - Overview of EnergyConnect (WSP)

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## 2.2 EnergyConnect (NSW – Western Section)

The proposed works for EnergyConnect (NSW - Western Section) will traverse from SA/NSW border (near Chowilla in SA) to Buronga and Buronga to the NSW/Victoria border at Monak (near Red Cliffs in Victoria), a distance of approximately 160 kilometres (Figure 2.2). The NSW western section is situated within the Wentworth Local Government Area (LGA).

The works for EnergyConnect (NSW - Western Section) will be delivered in two stages. Stage 1 involves works at Buronga Substation. Stage 2 involves all remaining works including but not limited to construction of approximately 135km of new 330kV double circuit transmission line, upgrade of existing 24 km long 220kV single circuit transmission line (Line 1 and Line 4) and the upgrade and expansion of the existing Buronga substation to a combined operating voltage of 220kV/330kV.

The relevant background information relating to key environment aspects is provided in Table 2.1.

**Table 2.1 – Relevant environmental background**

Environmental aspect	Description of key environmental aspects
Aboriginal heritage	<p>The project within the lands of the Barkindji and Maraura people. A search of Aboriginal objects, sites and places registered on the AHIMS register identified 43 sites within the project study area (1km wide corridor). Field survey carried out in the EIS for the project identified 131 previously unrecorded Aboriginal site features, including:</p> <ul style="list-style-type: none"> <li>• 34 stone artefact scatters;</li> <li>• 30 scarred trees;</li> <li>• 29 isolated finds;</li> <li>• 19 sites with a combination of multiple site types;</li> <li>• 12 hearths;</li> <li>• six shell middens; and</li> <li>• one post contact artefact scatter (glass).</li> </ul> <p>Areas where the potential for subsurface archaeological material is considered to be moderate or high are defined as potential archaeological deposits (PADs).</p> <p>The project was also subject to additional survey in accordance with condition D29 c) of the Infrastructure Approval. Further sites were identified and described in the <i>Addendum Aboriginal Archaeological Survey Report</i> (45860-G-70005-REP-U-00010). The Heritage Management Plan also contains detail in relation to the features identified during the additional heritage survey.</p>
Biodiversity	<p>Twenty-three plant community types (PCTs) were identified in the project area. Two of these PCTs (PCT19 and PCT21) meet the criteria of Sandhill Pine Woodland in the Riverina, Murray-Darling Depression and NSW South Western Slopes bioregions (Sandhill Pine Woodland). This community is listed as an endangered ecological community (EEC) under the <i>Biodiversity Conservation Act 2016</i>.</p> <p>Field surveys carried out as part of the EIS identified five threatened flora species and 21 threatened fauna species within the project area.</p>
Traffic and transport	<p>The existing road network within the Wentworth LGA consists of a combination of National, State, Regional and local roads. The traffic volumes recorded outside of the major townships within the project area are typically low, while higher traffic volumes are evident near major townships due to day-to-day activities.</p> <p>The two key highways along the prospective haulage routes, Sturt Highway and Silver City Highway, have a bi-directional traffic volume of over 2,500 vehicles per day. Other key regional roads such as Arumpo Road have a traffic volume of approximately 300 vehicles per day in either direction and Renmark Road with the daily traffic volume recording no more than 50 vehicles per day.</p>
Non-Aboriginal heritage	<p>Three non-aboriginal heritage listed items of local significance were identified with curtilages that are located partially within the project area. The three heritage items are Nulla woolshed, Nulla Nulla homestead and Sturts Billabong.</p>
Soil and water	<p>The topography of the proposal study area is generally flat, with gentle slopes towards major watercourses including the Darling River, Darling Anabranh and the Murray River. The elevation of the proposal study area ranges between 35 and 80m Australian Height Datum (mAHD).</p> <p>The predominant soil types across the project area includes sand and clay or a mixture of the two. Investigations undertaken identify large proportions of very stiff to hard (calcareous) clays and dense to very dense sands.</p>

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Environmental aspect	Description of key environmental aspects
	<p>The majority of the project area is mapped as having low salinity potential. Published acid sulfate soils mapping indicates there is a low risk of these soils occurring across the project area, with the potential exception of areas surrounding watercourses. There are no mapped areas indicating naturally occurring asbestos minerals present.</p> <p>The proposal is located within the Lower Murray-Darling catchment, which is a sub-catchment of the Murray Darling Basin. There are three major watercourses which intersect the project area, these are the Great Darling Anabranch, Darling River, Murray River. There are a number of unnamed creeks occur in the project area.</p> <p>Water quality within the catchment is known to be impacted by existing land uses, particularly agricultural activities. Surface water run-off from agricultural areas is commonly identified as a diffuse source of high levels of nutrients, with this run-off being captured in major watercourses resulting in degradation of water quality.</p>
Noise and vibration	<p>Existing noise levels within and surrounding the proposal study area are influenced by the surrounding agricultural and rural residential land uses as well as local traffic. Unattended noise monitoring was undertaken at 694 Arumpo Road during 26 May and 10 June 2020 during preparation of the EIS. The EIS advises that this noise monitoring location was selected as it was considered to be representative of the existing background noise levels that would be experienced across the project. The noise monitoring reported an ambient noise level (<math>L_{Aeq}(15min)</math>) of 45dBA during the day, and 39dBA and 34dBA during the evening and night respectively.</p>

### 2.3 Staging

Condition E2 allows the preparation of plans on a staged basis with the approval of the Planning Secretary. Where a plan is staged, the scope of works can be carried out without addressing the particular requirements of conditions that are not applicable to the particular stage. This CEMP and associated CEMP sub-plans are staged in accordance with condition E2.

This Construction Environmental Management Plan has been prepared specifically for EnergyConnect (NSW – Western Section) Stage 2. Transgrid/SecureEnergy will notify DPE in writing via the Major Projects website portal of the date of commencing Stage 2.

The key project components of Stage 2 of construction include, but are not limited to, the activities provided in Table 2.2.

**Table 2.2 - Key project components of Stage 2 of construction**

Key activity	Description of key activity
Pre-construction minor works permitted in accordance with the Infrastructure Approval.	<p>Key activities nominated in this stage will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval.</p> <p>The definition of 'construction' within the Infrastructure Approval excludes these activities. They will therefore not be subject to the Stage 2 CEMP and CEMP sub-plans. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval.</p> <p>Key activities include:</p> <ul style="list-style-type: none"> <li>environmental investigations, including biodiversity and heritage protection, salvage and recordings;</li> <li>Aboriginal heritage assessment, mitigation (ie exclusions zones) and salvage activities including subsurface testing/test excavation, additional survey, and consultation with RAPs;</li> <li>other survey work, such as road dilapidation surveys, and surveys of the general alignment and existing utilities;</li> <li>installing of environmental management measures, fencing, enabling works; and</li> <li>connections and pre-commissioning of utilities (wastewater treatment plant, electrical power, lighting etc.).</li> </ul>



Key activity	Description of key activity
Continuation of any outstanding Stage 1 construction activities	<p>Construction activities undertaken during Stage 1 of the project will continue where required. This includes, but is not limited to continuation of the following activities:</p> <ul style="list-style-type: none"> <li>• any outstanding construction earthworks activity at the Buronga substation;</li> <li>• operation of the Buronga earthworks material site, including the crushing and screening plant, where required;</li> <li>• operation of the Buronga construction compound including offices and laydown area; and</li> <li>• use of access and egress points.</li> </ul>
Establishment of Wentworth accommodation camp	<p>The main activities that would be undertaken at the Wentworth accommodation camp and construction compound and the Anabran South ancillary construction site include:</p> <ul style="list-style-type: none"> <li>• clearing of vegetation within the disturbance area;</li> </ul>
Establishment and operation of Wentworth construction compound	<ul style="list-style-type: none"> <li>• clearing and removal of topsoils. Topsoil would be stockpiled on site for later reuse;</li> <li>• establishing the Wentworth accommodation and associated facilities, site offices, amenities, wastewater treatment plant, power generators, hazardous material and fuel storage area, and internal roads;</li> <li>• establishing and operating Wentworth construction including but not limited to amenities compound site offices, concrete batching plant, internal roads and other ancillary facilities; and</li> </ul>
Establishment and operation of Anabran South ancillary construction site	<ul style="list-style-type: none"> <li>• establishing and operating Anabran South ancillary construction site laydown areas, vehicle and equipment storage, maintenance sheds, potential stockpile areas, demountable offices and parking.</li> </ul>
Buronga substation upgrade and expansion	<p>The existing Buronga 220kV substation would be upgraded and expanded to add a new 330kV substation on the land parcel adjacent to the existing 220kV substation. The upgrade and expansion of the Buronga substation would consist of the following key activities in addition to the works undertaken during Stage 2 of construction:</p> <ul style="list-style-type: none"> <li>• civil works including: <ul style="list-style-type: none"> <li>- underground mesh installation (earthing grid);</li> <li>- foundation and footing works for the electrical equipment; and</li> <li>- installation of the synchronous condenser (SynCon) building slab.</li> </ul> </li> <li>• mechanical works including: <ul style="list-style-type: none"> <li>- erection of the SynCon, transformers, shunt reactor and capacitor banks;</li> <li>- installation of oil treatment;</li> <li>- gantry erection;</li> <li>- installation of electrical equipment;</li> <li>- installation of supporting steel structure;</li> <li>- overhead HV cables and cable pulling;</li> <li>- outdoor installation of lighting and lightning systems;</li> <li>- switchyard building installation (including control equipment); and</li> <li>- construction of the SynCon building.</li> </ul> </li> <li>• electrical works including: <ul style="list-style-type: none"> <li>- LV cable pulling, cable dressing and terminations; and</li> <li>- outdoor installation of the lighting system.</li> </ul> </li> </ul>
Establishment ancillary facilities along the transmission line corridor in areas that do not require additional heritage survey or test excavation.*	<p>A number of minor staging, storage and laydown ancillary areas would be required within the project corridor for temporary storage of materials, plant and equipment required to construct the various elements of the proposal (in particular transmission line structures). Some temporary mobile batching plant locations may also need to be established to enable for easily access to concrete.</p> <p>Upon completion of works, these ancillary sites would be cleared of any temporary infrastructure and equipment, and rehabilitated. These sites would be</p>



Key activity		Description of key activity
		in place for shorter periods at locations suitable to support the construction works as they move along the alignment.
	Property adjustment work, including adjustments to property fencing	Installation or adjustment of gates and fences would be required at some locations along the alignment to enable access from the nearest roadway to construction areas. These would be constructed in consultation with the relevant council and/or affected landholder.
	Water supply points – establishment and/or use	A series of water supply points have been identified as suitable connection points to existing water supply pipelines. The proposed water supply points which are to be established and / or used include: <ul style="list-style-type: none"> <li>• Alcheringa Drive, Buronga;</li> <li>• Modica Crescent, Buronga;</li> <li>• Fletchers Lake Drive, Dareton;</li> <li>• Beverley Street, Wentworth; and</li> <li>• 690 Pomona Road, Pomona/Oxley Drive, Pomona.</li> </ul>
	Construct access points	The establishment of access points would include: <ul style="list-style-type: none"> <li>• establishing vehicle access and egress points including adjustment of state and regional roads to ensure safe vehicle movements; and</li> <li>• establishing truck wheel wash or rumble grids.</li> </ul> <p>The definition of construction within the Infrastructure Approval does not include road upgrades (which includes access points). Road upgrade works are, however, incorporated within the Traffic and Transport Management Plan as required by condition D40 b).</p>
	Construct access tracks	Access to each tower would be required during construction. Access tracks would be required to be traversable by a range of vehicles. Access tracks would fall into two broad groups: <ul style="list-style-type: none"> <li>• un-improved access tracks - using existing roads or tracks, or driving on existing soil or ground surface with minimal or no prior preparation; and</li> <li>• constructed access tracks – around six metres wide and would generally follow the natural contour of the land as far as practicable to minimise the amount of cut and fill and soil disturbance. Access tracks would also include drainage control features such as table drains or cross banks to minimise erosion.</li> </ul> <p>Constructed access tracks would be required in areas, outside identified heritage risk zones, where there are no existing roads or tracks, or where terrain conditions prevent continuous access along the line easement between road crossings.</p>
	Temporary works	The project will require a significant quantity of temporary works during construction. Temporary works will be undertaken outside identified heritage risk zones. The temporary works will includes, but not limited to, the following: <ul style="list-style-type: none"> <li>• earthworks, including trenches, excavations, temporary slopes, stockpiles, and embankments;</li> <li>• structures, such as formwork, shoring, edge protection, temporary bridges, solid fencing/guardrails/barriers and signage, temporary scaffold; and</li> <li>• equipment/plant foundations, such as work platforms, crane, and piling platforms.</li> </ul>
Transmission line construction	Earthworks and transmission tower footing construction	Excavation works and establishment of construction pads at each tower site would be required for the installation of foundations, levelling around the individual tower foundations, drainage and grading or preparation for construction at the tower site. Excavations would typically be up to five metres in depth. Construction of footings and foundation works for the new transmission line towers includes: <ul style="list-style-type: none"> <li>• piling. Typical transmission line tower piling depth would be generally up to 6-15 metres below ground level and would depend on ground conditions (e.g. greater piling depths would be required where soft soil types are present). The foundation type would also vary (subject to detailed design) but would consist of either: <ul style="list-style-type: none"> <li>– bored pile (reinforced concrete);</li> </ul> </li> </ul>

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Key activity	Description of key activity
	<ul style="list-style-type: none"> <li>- driven or screw pile (concrete or steel); and</li> <li>- helical screw anchor, or cast in-situ reinforced concrete.</li> <li>• excavation to create bench sites (stepped ground excavation) where required to provide a level platform for equipment setup, the erection of the tower and other construction activities. Benching would be constructed by use of earthing equipment such as graders and excavators;</li> <li>• steel fabrication works; and</li> <li>• concrete pours.</li> </ul>
Assembly and erection of transmission line towers	<p>The transmission line towers would typically be erected by assembling in sections on the ground and hoisting or lifting successive sections into place using cranes.</p> <p>Alternatively, towers may be erected in place on the footings by installing individual members. These towers would include infrastructure such as step bolts, climbing attachment plates, ladders, platforms, climbing barriers, identification plates, warning plates, other fixtures and fittings for the attachment of earthwires and insulators.</p>
Stringing of transmission lines including conductors and overhead earth wires and optical ground wire	<p>Following erection and securing of the tower, the transmission line would be strung by either a ground pulled draw wire (with brake/winch sites) or a line stringing drone.</p> <p>The area required for the construction of each tower would require access for tower assembly and stringing works. Where a transmission tower is proposed to allow for a direction change of the transmission line, a larger area would be required (to allow for brake and winching sites). At a typical site, this would include a temporary area of up around 60 metres by 80 metres at each transmission line tower location.</p> <p>Stringing of transmission line would also be required across the following three major watercourses:</p> <ul style="list-style-type: none"> <li>• the Great Darling Anabranh, Wentworth NSW;</li> <li>• Darling River, Ellerslie NSW; and</li> <li>• Murray River, Monak NSW / Red Cliffs Victoria.</li> </ul> <p>The general construction methodology is to assemble and erect a transmission line structure on either side of each major river crossing. A drone would then be used to take a lead wire over the river to allow cables to then be pulled and strung tower to tower.</p>
Installation of earthing conductors	<p>The following key activities will be undertaken:</p> <ul style="list-style-type: none"> <li>• installation of earthing conductors at each of the transmission tower arms; and</li> <li>• installation of earthing or isolation sections of fences and gates where the transmission line crosses or closely runs parallels to a metallic fence.</li> </ul>
Utility adjustments and protection	<p>Utility adjustment works would be required to convert several overhead distribution powerlines up to and including 66kV to underground cables.</p> <p>The existing alignment of the Broken Hill transmission line would require relocation at two locations. This would comprise of:</p> <ul style="list-style-type: none"> <li>• a permanent relocation of the existing transmission line in the vicinity of the Darling River. This would require the construction of two new monopoles, and the stringing of conductors/earth wires between the existing and new structures. The redundant tower would be decommissioned; and</li> <li>• a temporary relocation of a section of the existing transmission line that currently passes through the existing Buronga substation. This would be temporarily relocated around 200 metres to the east of its current alignment (along the eastern boundary of the existing substation site). Once the construction works to upgrade the substation are completed, the alignment of the 220kV Broken Hill line would be restored in a location generally consistent with the original line location.</li> </ul> <p>General utility protection and adjustment works, where required, to allow for the Buronga substation expansion and upgrades works to occur, the establishment and operation of the construction compound and accommodation camps, and where else required.</p>

Key activity	Description of key activity
Decommissioning of existing infrastructure	Decommissioning and removal of: <ul style="list-style-type: none"> <li>• the existing 220 kV transmission line between Buronga substation and the NSW/Victoria border;</li> <li>• the temporary bypass transmission line infrastructure installed to allow construction of the new double circuit 220kV line; and</li> <li>• a single tower on the existing 220kV Broken Hill line in the vicinity of the Darling River.</li> </ul>
Progressive site rehabilitation and landscaping	Site rehabilitation would be carried out progressively along completed sections of the transmission line as well as the expanded substation site. These activities includes: <ul style="list-style-type: none"> <li>• removal of redundant environmental controls within the transmission tower footprint; and</li> <li>• removal of temporary equipment and machinery.</li> </ul>

Some activities nominated in this stage will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval. Following approval of the CEMP for Stage 2, these works will remain excluded from the definition of 'construction' and therefore which are not subject to the CEMP. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval.

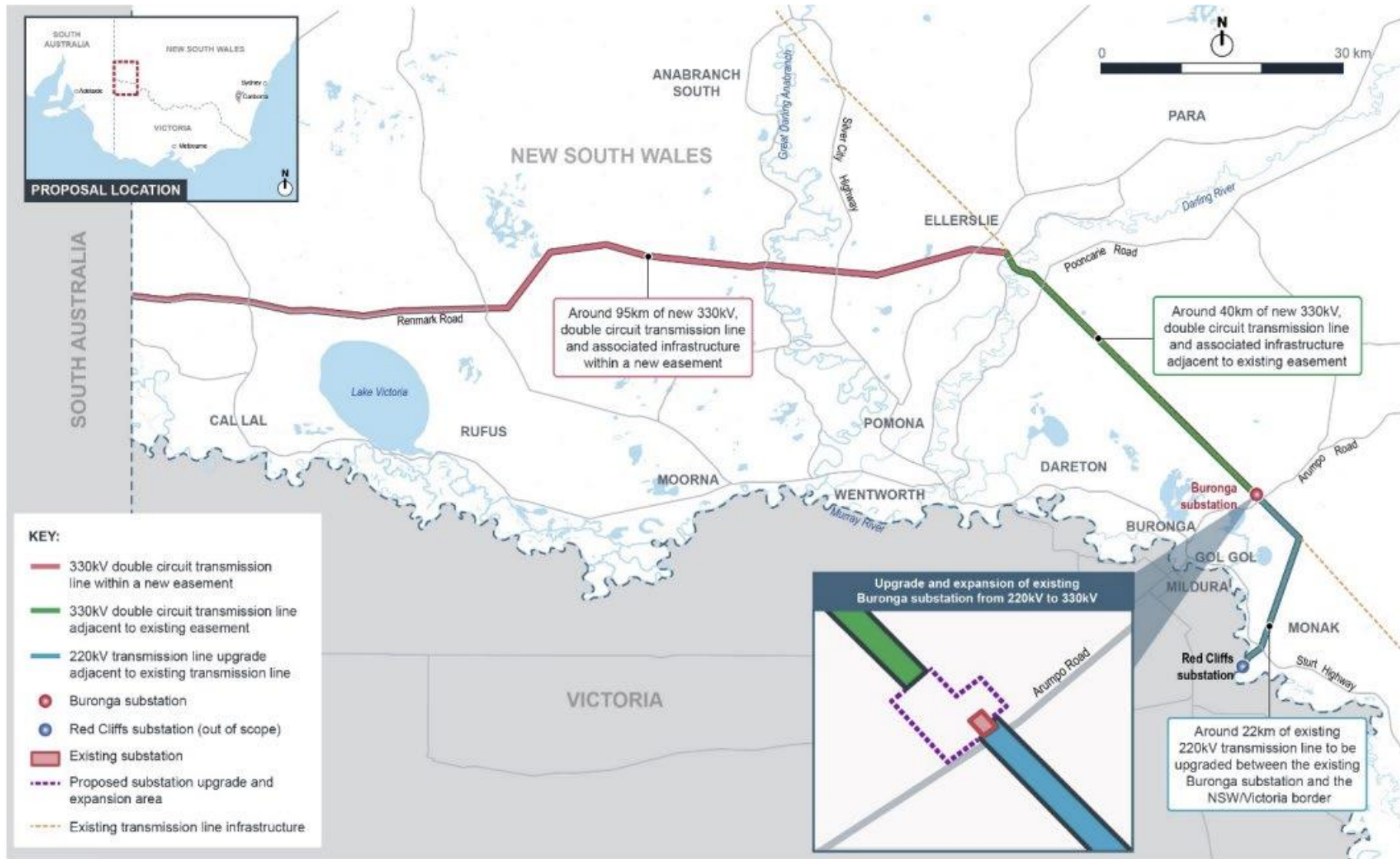


Figure 2.2 - Key features of EnergyConnect (NSW - Western Section) as shown in the EIS

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### 3 Planning

#### 3.1 Legal and other requirements

A summary of legal requirements is provided within Appendix A1. This register will be maintained by SecureEnergy throughout the project and updated as required.

Legal and other requirements are managed in accordance with the *Global Control of Legal and Other Requirement Procedure* which describes the minimum requirements for the identification and management of Health, Safety, Security and Environmental (HSSE) legislation and other requirements applicable to project activities.

Any legislative updates will be notified to relevant SecureEnergy personnel through the use of LawStream. Changes made to the legal requirements register will be communicated to the wider team where necessary through toolbox talks, specific training or other methods detailed in Section 6.

SecureEnergy will obtain licences, permits and approvals as required for the works and maintain them as required throughout delivery of the project, which may include but not be limited to Environment Protection Licence (EPL) for scheduled activities under the *Protection of the Environment Operations Act 1997* (POEO Act) and road occupancy licences (ROLs). Copies of licences, approvals and permits shall be held digitally within the site office with files available for audit and inspection purposes.

Some licences or permits may be held by subcontractors or external parties engaged to SecureEnergy and have not been specifically listed within the summary. Examples include:

- licences for transporting certain waste types;
- an asbestos removal licence (Class A or Class B licence);
- drivers of dangerous goods vehicles to hold a dangerous goods licence; or
- licensed ecologists for threatened species handling.

#### 3.2 Conditions of approval

The conditions of the Infrastructure Approval relevant to the preparation of this CEMP are included within Table 3.1. The conditions of the Infrastructure Approval relevant to each management sub-plan are dealt with within each of those plans.

There are several conditions of the Infrastructure Approval that are unassigned to a specific environmental management sub-plan or other project management plans. The management measures that will be implemented for the project in relation to these conditions are provided in Appendix A5 of this CEMP. A table detailing where each condition of the Infrastructure Approval is addressed is provided in Appendix A6 of this CEMP.

**Table 3.1 - Conditions relevant to this CEMP**

Condition no.	Requirement	Where addressed
B1	Prior to the commencement of construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.	This plan



Condition no.	Requirement	Where addressed																		
B2	<p>The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1.</p> <p><b>Table 1: CEMP Sub-plans</b></p> <table border="1"> <thead> <tr> <th></th> <th>Required CEMP Sub-plan</th> <th>Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Noise and Vibration</td> <td>Council</td> </tr> <tr> <td>(b)</td> <td>Soil and Water</td> <td>DPIE Water Council</td> </tr> <tr> <td>(c)</td> <td>Biodiversity</td> <td>BCS Council</td> </tr> <tr> <td>(d)</td> <td>Heritage</td> <td>Heritage NSW Aboriginal stakeholders</td> </tr> <tr> <td>(e)</td> <td>Traffic and Transport</td> <td>TfNSW Council</td> </tr> </tbody> </table>		Required CEMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan	(a)	Noise and Vibration	Council	(b)	Soil and Water	DPIE Water Council	(c)	Biodiversity	BCS Council	(d)	Heritage	Heritage NSW Aboriginal stakeholders	(e)	Traffic and Transport	TfNSW Council	<p>Consultation of the CEMP sub-plans are addressed in Section 1.6.</p>
	Required CEMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan																		
(a)	Noise and Vibration	Council																		
(b)	Soil and Water	DPIE Water Council																		
(c)	Biodiversity	BCS Council																		
(d)	Heritage	Heritage NSW Aboriginal stakeholders																		
(e)	Traffic and Transport	TfNSW Council																		
B3	<p>Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation must be provided with the relevant CEMP Sub-Plan.</p>	<p>Consultation is addressed in Section 1.6.</p>																		
B4	<p>Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event prior to the commencement of construction.</p>	<p>The timing of submission of the CEMP sub-plans is addressed in Section 1.7.</p>																		
B5	<p>Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, must be implemented for the duration of construction. Where construction of the development is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the Planning Secretary.</p>	<p>Section 1.7 of this CEMP addresses the requirements of this condition.</p>																		
B6	<p>The CEMP and CEMP Sub-plans required under this approval must be prepared by suitably qualified and experienced persons in accordance with relevant guidelines, and include where relevant:</p>	<p>Section 1.5 addresses the preparation of this CEMP and CEMP sub-plans.</p>																		
	<p>a) a summary of relevant background or baseline data;</p>	<p>The relevant background/baseline data is provided in Table 2.1 and Section 3 of each of the CEMP sub-plans.</p>																		
	<p>b) details of:</p> <p>(i) the relevant statutory requirements (including any relevant approval or licence conditions);</p>	<p>The relevant statutory requirements are addressed in Section 3 and Appendix A1 of this CEMP, and Section 2 of the CEMP sub-plans.</p>																		
	<p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</p>	<p>Section 4.2 of this CEMP addresses the performance measures, criteria and performance indicators.</p>																		
	<p>c) any relevant commitments or recommendations identified in the EIS;</p>	<p>The relevant commitments or recommendations identified in the EIS are included within Section 3.3 of this CEMP and Section 2.3 of the relevant CEMP sub-plans.</p>																		

Condition no.	Requirement	Where addressed
	d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	The environmental measures that will be implemented are addressed within Section 3.3 and Appendix A5 of this CEMP, and Section 5 or 6 of the relevant CEMP sub-plan.
	e) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and</li> </ul>	Tables summarising the monitoring and reporting requirements are provided in Section 9.2 and 10 of this CEMP.
	<ul style="list-style-type: none"> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (d);</li> </ul>	Environmental inspections will be used to monitor the effectiveness of management measures. This is addressed in Section 9.1.
	f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Unpredicted impacts are addressed in Section 12. Unexpected finds procedures are also provided in the relevant CEMP sub-plans to address and manage unpredicted impacts.
	g) a program to investigate and implement ways to improve the environmental performance of the development over time;	Continuous improvement is addressed within Section 1.9 of this CEMP.
	h) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion;</li> </ul>	Managing and reporting incidents is addressed in Section 8 of this CEMP. Non-compliances are addressed in Section 10.1 and 11 of this CEMP. Exceedance of any impact assessment criterion is addressed in Section 9.2. Exceedance of any performance criterion is addressed in Section 4.2.
	<ul style="list-style-type: none"> <li>(ii) complaint; or</li> </ul>	Managing and reporting complaints are addressed in Section 7.2 of this CEMP.
	<ul style="list-style-type: none"> <li>(iii) failure to comply with other statutory requirements; and</li> </ul>	Managing and reporting other statutory requirements are addressed in Section 10.1.3 of this CEMP.
	i) set out the procedures that would be implemented to: <ul style="list-style-type: none"> <li>(i) keep the local community and relevant agencies informed about the construction and environmental performance of the development;</li> </ul>	Communication with local community and relevant agencies are addressed in Section 7 of this CEMP.
	<ul style="list-style-type: none"> <li>(ii) receive, handle, respond to, and record complaints;</li> <li>(iii) resolve any disputes that may arise;</li> </ul>	Managing and reporting complaints and disputes are addressed in Section 7.2 of this CEMP.
	<ul style="list-style-type: none"> <li>(iv) respond to any non-compliance;</li> </ul>	Response to any non-compliances is provided within Section 10.1 and 11 of this CEMP.
	<ul style="list-style-type: none"> <li>(v) respond to emergencies; and</li> </ul>	Response to emergencies is provided within Section 8.1 of this CEMP.
	j) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and	Roles and responsibilities are detailed within Section 4.9 of this CEMP.

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Condition no.	Requirement	Where addressed
	k) a protocol for periodic review of the CEMP and associated subplans and programs.	Periodic review of the CEMP and CEMP sub-plans are addressed in Section 1.10 of this CEMP.
	The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	Noted

### 3.3 Revised mitigation measures

Environmental safeguards and mitigation measures are included in Section 23.1.4 of the EIS. During the preparation of the Response to DPIE Request for Information, the revised mitigation measures (RMMs) were amended and included in Appendix G.

There were no specific RMMs relevant to the preparation of this CEMP identified in the Response to DPIE Request for Information. RMMs relevant to a specific environmental aspect along with the proposed management measures are dealt with within the specific environmental management sub-plan as described in Section 4.3.1.

There are several RMMs that are unassigned to a specific environmental management sub-plan or other project management plans. However these RMMs are applicable during the construction phase of the project and therefore are required to be included under the environmental management system. These RMMs are provided in Table 3.2 below. The management measures that will be implemented for the project in relation to these RMMs are provided in Appendix A5 of this CEMP. A table detailing where each RMM is addressed is provided in Appendix A6 of this CEMP.

**Table 3.2 - RMMs that are unassigned to a specific environmental management sub-plan**

Reference	Revised mitigation measure	Applicable locations (from RMMs)	Where addressed	How addressed
RMM LV3	Proposed permanent engineering batters and water management measures will be designed to integrate with the existing landforms and natural features.	Whole of proposal	MM1 of Appendix A5 of this CEMP.	Design reports will consider integration of permanent engineering batters with existing landforms and natural features.
RMM LV4	Lighting at construction compound and accommodation camps will be designed and operated in accordance with AS4282-2019 Control of the obtrusive effects of outdoor lighting.	Construction compound and accommodation camps	MM2 of Appendix A5 of this CEMP.	Lighting at the Buronga construction camp and accommodation camp will be designed generally in accordance with AS482-2019.
RMM LV5	Transmission line structures, where possible, are designed: <ul style="list-style-type: none"> <li>to maximise distance from private residences</li> <li>to use local vegetation and landform to provide screening from residences or from the road</li> <li>to be regularly spaced to reduce the potential visual impact where the proposal alignment is visible for a long duration, and in open landscapes</li> <li>to be positioned alongside existing transmission line</li> </ul>	Whole of proposal	MM3 of Appendix A5 of this CEMP.	The listed aspects will be considered in design reports during the detailed design of the transmission line structures, where possible.

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Reference	Revised mitigation measure	Applicable locations (from RMMs)	Where addressed	How addressed
	<p>structures where they are adjacent to existing transmission lines where feasible</p> <ul style="list-style-type: none"> <li>to avoid the location of transmission line structures on locally prominent landforms</li> <li>to minimise clearing along creeklines.</li> </ul>			
RMM LV6	Where the transmission line crosses a roadway, transmission line structures will be located to maximise the distance from the roadway where feasible and where it will achieve an improved visual amenity outcome, where feasible and reasonable.	Transmission line	MM4 of Appendix A5 of this CEMP.	Visual impacts from transmission line structures where transmission line crosses a roadway will be considered during detailed design phase.
RMM LV8	Opportunities for screening vegetation to be provided on private property will be investigated where, once at a mature height, will reduce an identified visual impact from a residence. This will be undertaken in negotiation with the affected resident. This will be informed by further assessment to determine the extent of the impact and appropriateness of any screening vegetation. Any such screening vegetation will be planted prior to completion of construction and will be maintained by the landholder.	Transmission line	MM5 of Appendix A5 of this CEMP.	Opportunities for screening vegetation for affected private property landholders will be investigated.
RMM LV9	Lighting at the substation will be designed and operated in accordance with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting.	Buronga substation	Not applicable to Stage 2 works.	Not applicable to Stage 2 works. In the Response to DPIE Request for Information, RMM LV9 is assigned to the operation phase.
RMM HR1	<p>The proposal will be designed and constructed in accordance with the Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz – 100 kHz) (International Commission on Non-Ionizing Radiation Protection (ICNIRP), 2010)</p> <p>The design will meet the EMF exposure guidelines set out in Table 19-2 of the EIS and worst case scenarios within Transgrid's <i>Transmission Line Design Manual – Major New Build</i>.</p>	All locations	MM6 of Appendix A5 of this CEMP.	The design requirements in relation to electric and magnetic field is outlined in MM3 of Appendix A5 of this CEMP and through design reports.

### 3.4 Standards and guidelines

The following standards relating to environmental management that apply to the project include:

- *ISO 14001 Environmental Management Systems – Requirements with Guidance for Use*; and
- NSW Department of Planning, Industry and Environment, 2020, *Independent Audit Post Approval Requirements*.

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Compliance standards, policies and guidelines relevant to specific environmental values are detailed in the respective sub-plans. The requirements of these standards have been taken into account in the preparation of the CEMP and sub-plans and will be considered by SecureEnergy during the preparation of the Work Packs and Work Method Statements.

Any guideline, protocol, Australian Standard or policy reference in the Infrastructure Approval will be taken in the form/version they were in as at the date of the Infrastructure Approval. Updated or revised version of the relevant guideline, protocol, Standard or policy, or a replacement of the document will be considered when the Planning Secretary issues the direction to do so.

## 4 Environmental management system

The SecureEnergy Management System includes the Environmental Management System. It has been designed to comply with the requirements of *ISO 14001 Environmental Management Systems*.

The Health, Safety, Security and Environment Management Manual (HSSE Manual) describes the Environmental Management System for SecureEnergy. Table 4.1 summarises the Environmental Management System components.

**Table 4.1 - Environmental Management System components**

Management System Component	Description
HSSE Policy & HSSE Management Expectations	The policy sets the overall guidelines and direction to HSSE and represents the commitment of management to the achievement of its aims. The <i>HSSE Management Expectation</i> clearly defines minimum expectations to ensure that all SecureEnergy personnel and subcontractors understand their obligations and accountabilities to contribute to SecureEnergy HSSE culture.
HSSE Operating Standards	The HSSE Operating Standards set out the minimum mandatory performance requirements. Environmental minimum mandatory performance requirements are set out in the following HSSE related Operating Standards: <ul style="list-style-type: none"> <li>• Environment Management Operating Standard; and</li> <li>• Major Accident Event Hazard Management Operating Standard.</li> </ul>
HSSE Management Manual	Provides a framework for the HSSE component of the BMS, an overview of the key elements and reference documents.
HSSE Procedures, documents and registers (tools)	Procedures or work practices which provide the detailed steps to be taken to identify risks, work safely, protect the environment, investigate incidents and implement continuous improvement.
HSSE Management Plans – this CEMP and relevant sub-plans	Project specific plans prepared to identify and manage project HSSE risks and achieve the Operating Standards performance requirements.
Project/Site Specific Procedures, Work Instructions	Project and activity specific procedures, risk assessments and work methods to mitigate HSSE hazards. These are prepared by project personnel.

The structure of the environmental management system for the project is shown in Figure 4.1.

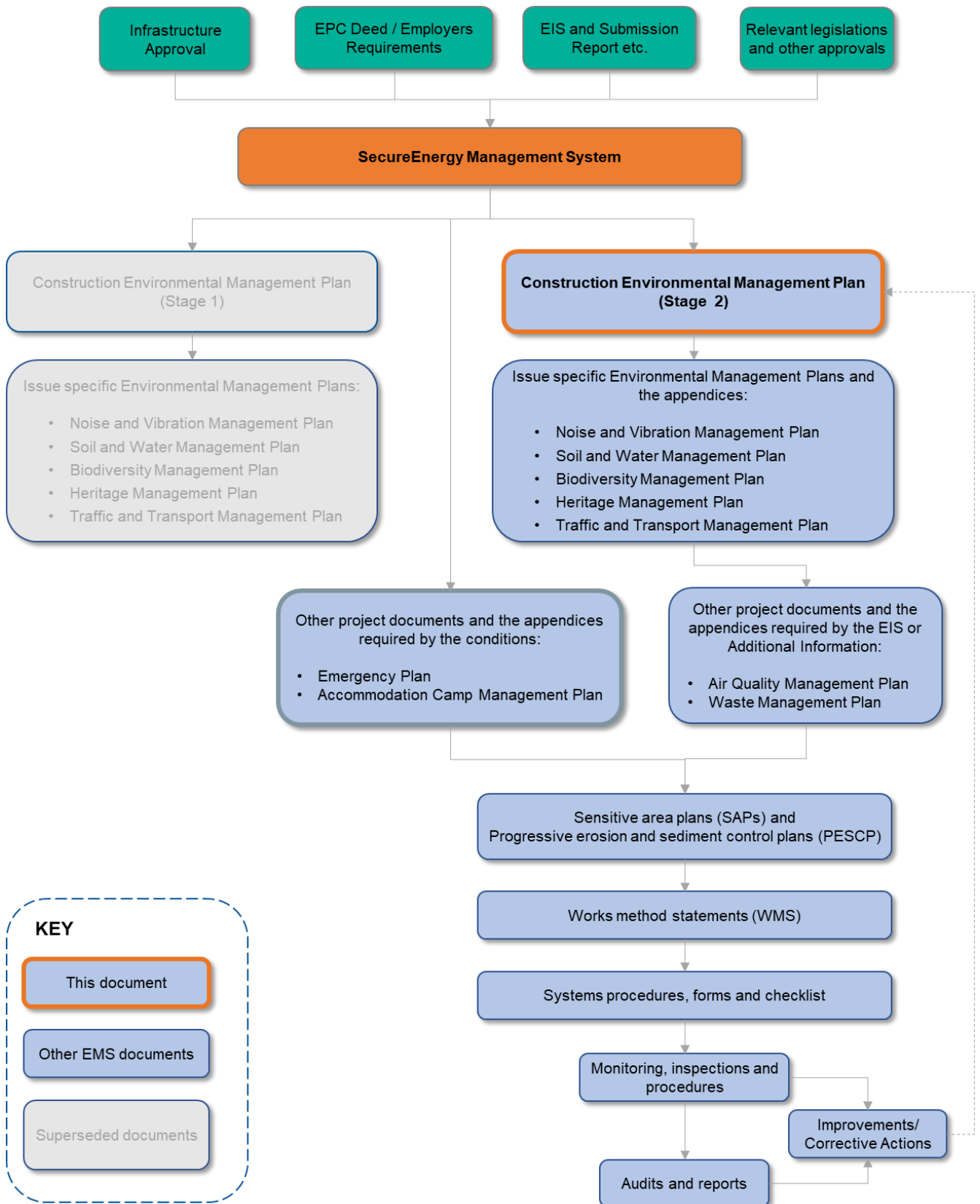


Figure 4.1 - Environmental Management System

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#### 4.1 Environment policy

SecureEnergy believes that respect for the project location, its surroundings and the communities in which it operates is essential for project success, as well as compliance with all environmental requirements.

SecureEnergy will adopt and use the existing Clough Management Systems. As a result, SecureEnergy will adopt Clough Policies that inform these systems as amended from time to time. SecureEnergy’s Policy Model is provided in Appendix A2 along with Clough’s Policy for Environment, Sustainability and Community which will be implemented on EnergyConnect.

Policies will be clearly displayed at SecureEnergy main site office facilities and regularly communicated to staff, employees and subcontractors during inductions and toolbox talks.

#### 4.2 Objectives and targets

As a means of assessing environmental performance, environmental objectives (performance measures), targets (criteria) and performance indicators have been established for the project and are provided in Table 4.2. These objectives and targets have been developed in consideration of requirements in the statutory approvals, contractual requirements, legislative requirements, HSSE performance requirements and significant environmental aspects and impacts.

Exceedances of the proposed targets will be investigated and reported based on the issue. Any exceedances which result in a non-compliance with the Infrastructure Approval will be reported in accordance with Section 10.1.

**Table 4.2 - Environmental objectives, targets and performance indicators**

Aspects	Objectives (performance measures)	Targets (criteria)	Performance indicators
Compliance	Compliance with Statutory Approvals and Infrastructure Approval	<ul style="list-style-type: none"> <li>Full compliance with statutory approvals.</li> <li>No regulatory infringements (PINs or prosecutions).</li> <li>No formal regulatory warning.</li> </ul>	Number of regulatory infringements (PINs or prosecutions), formal regulatory warning, audits.
	Implement and comply with the CEMP and associated management plans	<ul style="list-style-type: none"> <li>Zero non-compliances identified during each compliance audit of CEMP and sub-plans.</li> </ul>	Number of non-compliance arising from each audit.
	Address all corrective and preventative actions arising from audits	<ul style="list-style-type: none"> <li>All corrective and preventative actions arising from audits closed out within specific timeframes.</li> </ul>	Action close-out timing statistics in corrective and preventative action close-out reports.
Incident management and response	Ensure timely communication of incidents Minimise the risk of an incident by identifying risks and developing actions to minimise those risks	<ul style="list-style-type: none"> <li>All incidents reported in accordance with this management plan.</li> <li>All risks reviewed in accordance with the SecureEnergy management system.</li> </ul>	Follow up action of incidents as recorded in incident reports.
Engage with stakeholders and the broader community, minimise complaints and respond to any complaints within a suitable timeframe	Disseminate regular project updates and other information to keep the community informed of the project, particularly out of hours work. Record and respond to complaints, including noise and vibration complaints, within a timely manner.	<ul style="list-style-type: none"> <li>All project updates provided within the timeframes specific within the <i>Community Communication Strategy</i>.</li> <li>All complaints are review within the timeframes specific within the <i>Community Communication Strategy</i>.</li> </ul>	Timeliness of project updates per project website; and timeliness of complaints response as recorded on complaints register.

Aspects	Objectives (performance measures)	Targets (criteria)	Performance indicators
Sustainability	Promote sustainable infrastructure.	<ul style="list-style-type: none"> <li>Achieve an ISCA verified 'Design' and 'As-built' rating of Excellent under v1.2 of the IS rating tool.</li> </ul>	ISCA rating
Biodiversity	Minimise and manage the impacts of the project on biodiversity.	<ul style="list-style-type: none"> <li>No exceedance to clearing values of known biodiversity including flora and fauna species as specified in condition D25.</li> <li>Minimise the risk of injury and mortality of fauna.</li> </ul>	<ul style="list-style-type: none"> <li>Total clearing area as recorded on clearing register.</li> <li>Number of fauna injured as a result of procedures not being adhered to.</li> </ul>
Heritage	Minimise and manage the impacts of the project on Aboriginal and non-Aboriginal heritage items within the approved project corridor.	<ul style="list-style-type: none"> <li>No harm to known Aboriginal and known non-Aboriginal heritage.</li> </ul>	Number of incidents involving harm to known Aboriginal heritage objects or known non-Aboriginal heritage items.
Training and improvement	Provide adequate training to ensure construction activities are undertaken safely and with minimal risk to the environment. Continuously improve environmental performance	<ul style="list-style-type: none"> <li>Regular environmental training that focuses on the specific project activities and associated environmental risks.</li> <li>Regular pre-start meetings and toolbox talks in accordance with Section 6.</li> </ul>	Records of induction, toolbox talks with environmental focus, daily pre-start meetings.
Inspections and audits	Completion of weekly inspections and audits	<ul style="list-style-type: none"> <li>100% completion of scheduled audits and weekly inspections.</li> </ul>	Environmental inspections, audits.

### 4.3 Construction Environmental Management Plan

This CEMP, as shown in Figure 4.1 is the overarching management tool in relation to environmental performance during project delivery. This CEMP describes the construction environmental management framework for the project and the system for minimising and managing environmental risks.

Once approved by the Planning Secretary, this CEMP and the relevant Stage 2 sub-plans will supersede the existing Stage 1 CEMP and sub-plans.

The CEMP details the management plans which have been, or will be, prepared to address specific environmental aspects of the project, and outlines the environmental management practices that are to be followed during construction. It provides the overall framework for the system to ensure environmental impacts are minimised and legislative and other requirements are fulfilled.

#### 4.3.1 Environmental management sub-plans

A number of specific environmental management sub-plans (CEMP sub-plans) have been prepared to support the CEMP, as outlined in Figure 4.2. Table 4.3 list the CEMP sub-plans that are required under condition B2 of the Infrastructure Approval. The sub-plans document the environmental aspects, impacts and management measures for each key environmental value. The CEMP sub-plans are provided in Appendix B.

Following approval of the relevant Stage 2 CEMP and sub-plans, the Stage 2 CEMP sub-plans will supersede the existing Stage 1 CEMP sub-plans.

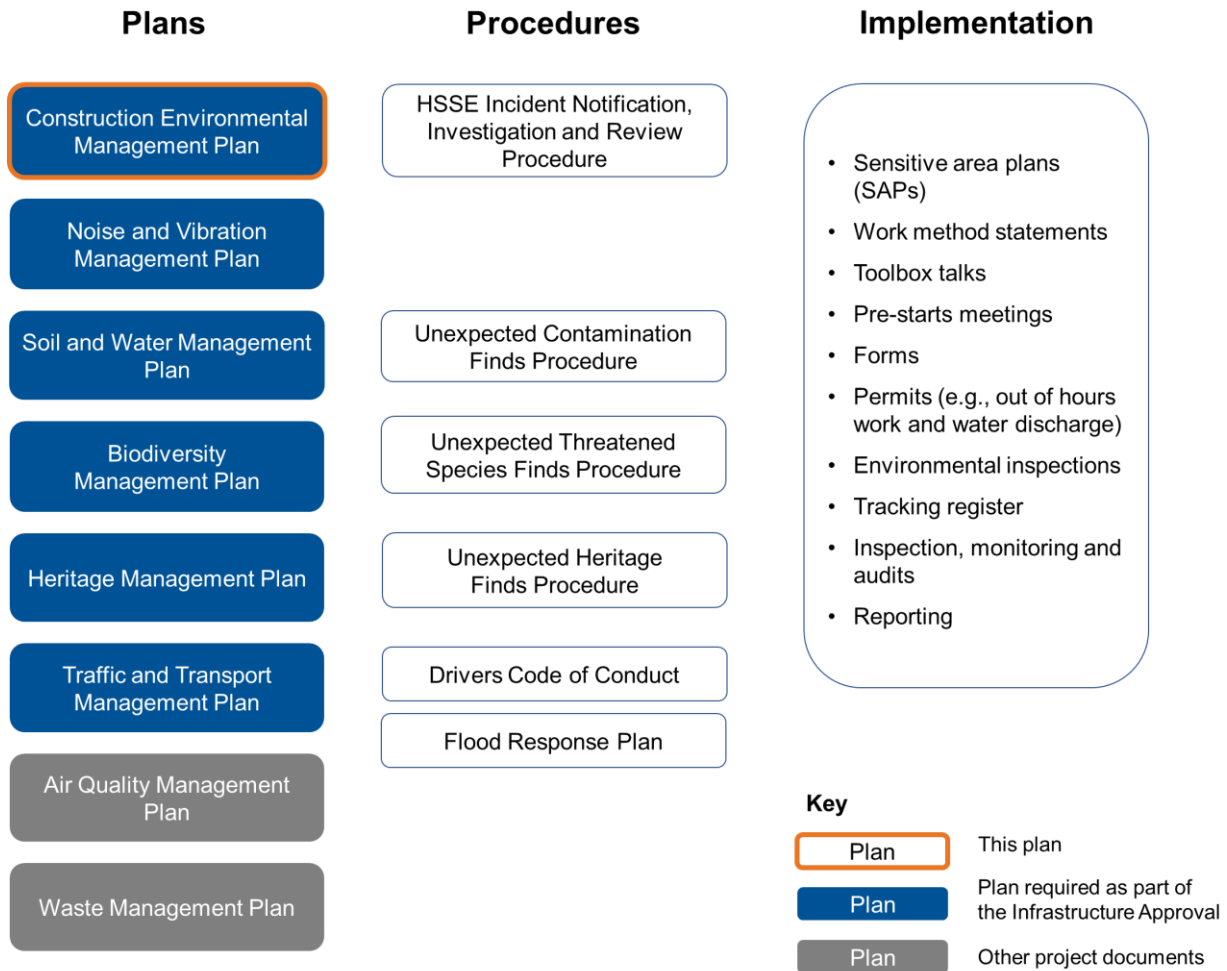


Figure 4.2 - CEMP framework

Table 4.3 - Environmental management plans

Document name	Condition	Stage 1	Stage 2	Stage 2 document number	Location
Construction Environmental Management Plan	B1	Superseded by Stage 2 document	Yes	45860-HSE-PL-D-0017	This plan
Traffic and Transport Management Plan (TTMP)	D40	Superseded by Stage 2 document	Yes	45860-HSE-PL-D-0018	Appendix B1 TTMP
Noise and Vibration Management Plan (NVMP)	D13	Superseded by Stage 2 document	Yes	45860-HSE-PL-D-0019	Appendix B2 NVMP
Biodiversity Management Plan (BMP)	D28	Superseded by Stage 2 document	Yes	45860-HSE-PL-D-0029	Appendix B3 BMP
Soil and Water Management Plan (SWMP)	D24	Superseded by Stage 2 document	Yes	45860-HSE-PL-D-0021	Appendix B4 SWMP
Heritage Management Plan (HMP)	D34	Superseded by Stage 2 document	Yes	45860-HSE-PL-D-0022	Appendix B5 HMP

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### 4.3.2 Other approval documents

A number of other documents that are required by the Infrastructure Approval are provided in Table 4.4.

**Table 4.4 - Other approval documents**

Document name	Condition	Document Number
Emergency Plan	D47	45860-HSE-PL-D-0025
Accommodation Camp Management Plan	D52	45860-HSE-PL-G-1027
Local Business and Employment Strategy	D53	45860-CM-PL-G-1002

## 4.4 Work Packs and Work Method Statements

Work Packs describe construction implementation in detail. The preparation of Work Packs involves a comprehensive review of the requirements of many aspects of project delivery, including design, construction, environment and health and safety. Work Packs provide specific instruction on how to construct and undertake certain elements of the project. As required, Work Packs will incorporate procedures relevant to site-specific activities, to reduce risk and ensure ongoing environmental compliance. These measures are based on relevant measures in the CEMP and sub-plans.

Work Method Statements (WMSs) are developed as part of the preparation of every Work Pack. WMSs set out the construction methodology for a particular activity or set of activities, specific to the project and incorporate work-specific environmental hazard assessments. WMSs are the document tools to transform the relevant management measures in the CEMP and sub-plans into actions to be implemented during the undertaking of project activities. The WMSs will ensure that location and activity-specific environmental features and risks (e.g. potential disturbance to threatened species habitat during clearing) are managed.

WMSs are typically prepared and reviewed by the construction team in consultation with the environmental team. The relevant environmental controls and management measures are incorporated into the WMS. The following are examples of high risk activities where a WMS will be prepared:

- Works in or near environmentally sensitive areas (including waterways);
- clearing and grubbing;
- sediment basin construction and management; and
- dewatering activities.

The site personnel and sub-contractors involved in the relevant activities will be briefed on the requirements in the WMS, with a toolbox talk or specific WMS briefing held prior to the commencement of the works (refer to Section 6 for further details). All construction personnel and sub-contractors undertaking tasks governed by the Work Packs and WMSs must acknowledge that they have read and understood their obligations prior to commencing work.

## 4.5 Sensitive area plans

Sensitive area plans (SAPs) will be prepared to support the identification and appropriate management of key environmental features associated with the project. An initial risk assessment for the site will be undertaken by the Environmental Team. Where the risk is identified as being moderate or above (ie locations where sensitive areas are located adjacent to the work area), a SAP will be developed and reviewed by the environmental team. The SAPs will identify areas/features of environmental and heritage sensitivity and 'no-go' zones, to help identify key risk areas, and promote ongoing communication to construction personnel.

Sensitive area plans include information pertaining, but not limited to:

- flora features, including threatened species and endangered ecological communities;

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- Aboriginal and non-Aboriginal heritage sites;
- watercourses;
- known fauna habitat to be protected (i.e. hollow bearing trees);
- areas of vegetation to be retained;
- clearing limit boundary; and
- any designated no-go zones.

#### 4.6 Progressive erosion and sediment control plans

Progressive erosion and sediment control plans (PESCPs) will be developed in accordance with the principles outlined in the erosion and sediment control strategy provided in the *Soil and Water Management Plan* (45860-HSE-PL-D-0021). The PESCPs will show the site layout and approximate location of erosion and sediment control structures on site. PESCPs will be updated as required a sites and associated erosion and sediment control requirements change.

A Certified Professional in Erosion and Sediment Control will prepare an Erosion and Sediment Control Plan for the project. Environmental staff will then typically develop the PESCPs in consultation with Project Engineers, Superintendents and Supervisors. This will ensure that erosion and sediment control management is incorporated into the planning stage of construction activities and is coordinated in its approach.

The Environmental Manager will approve PESCPs in the first instance. Minor changes thereafter will be approved by environment staff in consultation with the Environmental Manager, as required.

PESCPs are designed for use as a practical guide and may be produced in conjunction with the SAP and/or Work Packs/WMSs. For further details regarding soil and water management refer to the *Soil and Water Management Plan* (45860-HSE-PL-D-0021).

#### 4.7 Procedures, forms and other documents

Other documents such as project-specific procedures and strategies have been developed. These are provided in Table 4.5 below.

**Table 4.5 - Procedures, forms and other documents**

Document name	Document Number	Location
Unexpected Heritage Finds Procedure	45860-HSE-PR-G-1003	Appendix A of the HMP
Unexpected Threatened Species Finds Procedure	45860-HSE-PR-D-0002	Appendix A of the BMP
Pre-clearing and Clearing Procedure	45860-HSE-PR-G-1008	Appendix B of the BMP
Fauna Handling Procedure	45860-HSE-PR-G-1005	Appendix C of the BMP
Biosecurity Management Plan	45860-HSE-PL-D-0032	Appendix D of the BMP
Erosion and Sediment Control Strategy	45860-HSE-DOC-D-0002	Appendix A of the SWMP
Unexpected Contamination Finds Procedure	45860-HSE-PR-D-0003	Appendix B of the SWQMP
Spill Response Procedure	45860-HSE-PR-G-1004	Appendix C of the SWMP
Dewatering Procedure	45860-HSE-PR-G-1006	Appendix D of the SWMP
Out-Of-Hours-Work Protocol	45860-HSE-PR-D-0001	Appendix A of the NVMP
Drivers Code of Conduct	45860-HSE-PR-G-1009	Appendix A of the TTMP
Flood Response Plan	45860-HSE-PL-D-0023	Appendix B of the TTMP

#### 4.8 Document control and records

All project documents are to be numbered, approved, revised, transmitted, and stored in accordance with the *Project Document Control Plan* (45860-IM-PL-G-0003).

Records will be developed and maintained by SecureEnergy including:

- training records;
- incident reports;
- audit and inspection forms;
- monitoring results; and
- waste register including all waste tracking, volume of waste to landfill, waste recycled, waste disposed of offsite and licensed receiver dockets.

#### 4.9 Roles and responsibilities

##### 4.9.1 Organisational structure

For illustrative purposes, Figure 4.3 is provided as a simplified figure to represent SecureEnergy’s organisation structure.

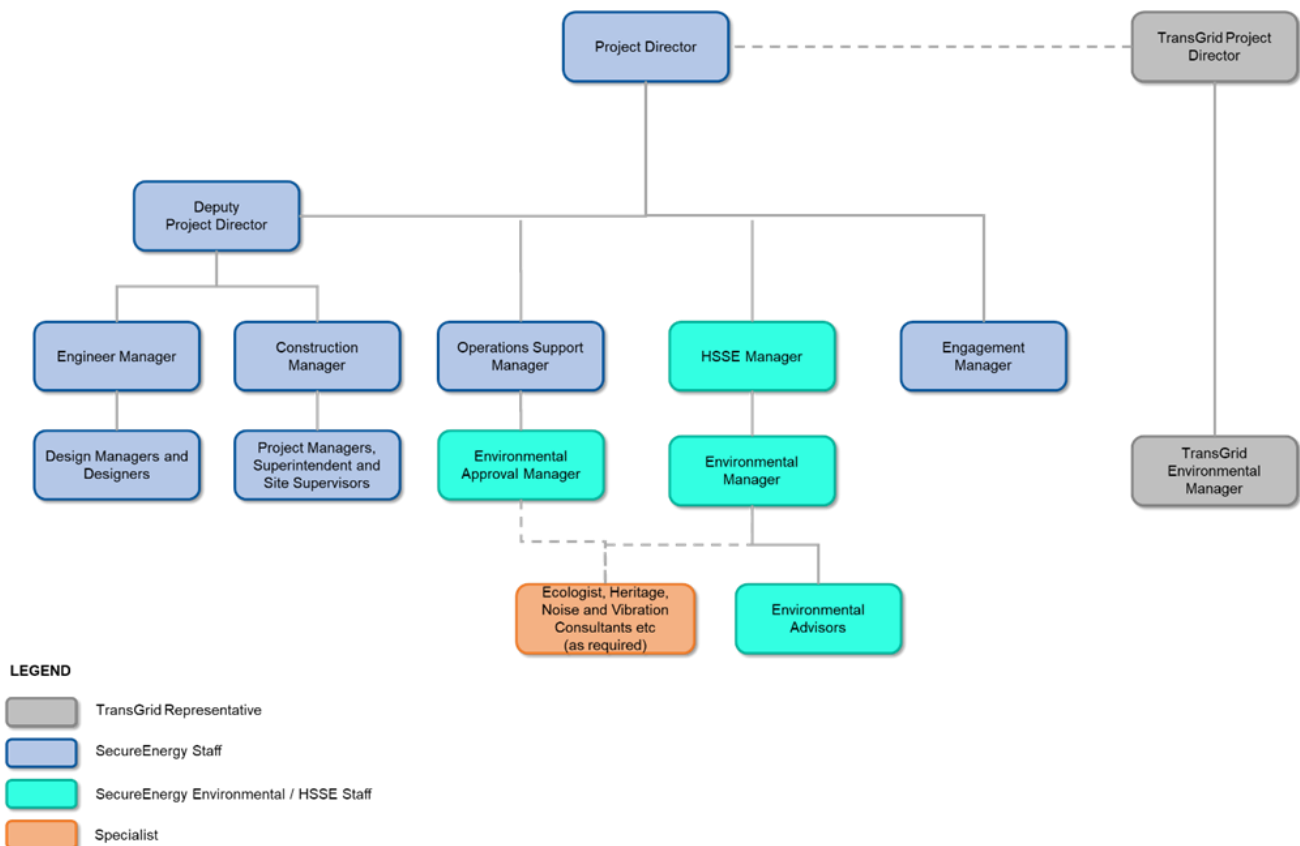


Figure 4.3 - Key roles within the organisation structure

SecureEnergy’s Project Director, in consultation with functional managers, will ensure that appropriate resources are available to effectively manage the implementation of the CEMP during delivery of the project.

All SecureEnergy staff, subcontractors and visitors are required to operate in accordance with this CEMP and related environmental management plans during construction.

The project environmental management structure incorporates the following site personnel:

- Environmental Manager responsible for overall management of the CEMP and environmental management plans; and
- Environmental Advisors to assist in implementing and monitoring measures in the CEMP and environmental management plans.

#### 4.9.2 Roles and responsibilities

Further detail regarding the roles and responsibilities is provided within Table 4.6.

**Table 4.6 - Environmental roles and responsibilities**

Role	Responsibilities
<b>Appointed Roles</b>	
<b>Environmental Representative</b>	<p>The responsibilities of the Environmental Representative (ER) include:</p> <ul style="list-style-type: none"> <li>• review the documents identified in Infrastructure Approval and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements under the Infrastructure Approval;</li> <li>• assist the Department in the resolution of community complaints as requested by the Planning Secretary; and</li> <li>• consider and approve any minor amendments made to the plans that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and other documents approved by the Planning Secretary.</li> </ul> <p>Note the ER will be a suitably qualified and experienced person, approved by the Planning Secretary no later than one week before project commencement. The ER must not have been not involved in the preparation of the EIS documents, and is independent from the design and construction of the development.</p>
<b>Transgrid</b>	
<b>Transgrid Project Director</b>	<p>The environmental responsibilities of the Transgrid Project Director include:</p> <ul style="list-style-type: none"> <li>• monitor the environmental performance of the project in relation to Transgrid requirements;</li> <li>• liaise with relevant stakeholders; and</li> <li>• attend project meetings.</li> </ul>
<b>Transgrid Environmental Manager</b>	<p>The responsibilities of the Transgrid Environmental Manager include:</p> <ul style="list-style-type: none"> <li>• liaise between SecureEnergy and stakeholders (including government agencies) as required;</li> <li>• undertake periodic inspections of the project sites to identify environmental non-compliances;</li> <li>• review changes to the project that are consistent with the project environmental assessment and approval documentation;</li> <li>• provide guidance and where appropriate, monitor compliance with DPE post approval document submission requirements;</li> <li>• review environmental management plans and related documents prepared for the project; and</li> <li>• monitor the environmental performance of the project in relation to Transgrid requirements and DPE post-approval document submission requirements.</li> </ul>
<b>SecureEnergy</b>	
<b>Project Director</b>	<p>The environmental responsibilities of the Project Director include:</p> <ul style="list-style-type: none"> <li>• overall delivery of the project program;</li> <li>• manage all key aspects of project performance, including environmental performance;</li> <li>• undertake actions in accordance with the project's due diligence framework;</li> <li>• define and refine project management philosophies, capabilities, processes and tools;</li> <li>• ensure project practices and on-site activities are conducted in accordance with project policies and procedures;</li> <li>• ensuring personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP;</li> </ul>

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Role	Responsibilities
	<ul style="list-style-type: none"> <li>• direct activities to ensure resource needs are accurately forecasted and linked to the project, including the identification of skill and behaviour requirements;</li> <li>• ensure personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP;</li> <li>• ensure resources are available to enable execution of project environmental management activities and project emergency response systems;</li> <li>• drive the creation of systems, practices and behaviours that promote the identification and appropriate management of potential risks and opportunities;</li> <li>• lead negotiations with Transgrid to achieve an agreed resolution of complaints and non-conformance reports (NCR);</li> <li>• approve all management plans prior to their implementation; and</li> <li>• attend and participate in environmental meetings as appropriate.</li> </ul>
<b>Deputy Project Director</b>	<p>The environmental responsibilities of the Deputy Project Director include:</p> <ul style="list-style-type: none"> <li>• support the overall delivery of the project program;</li> <li>• manage key aspects of project performance, including environmental performance;</li> <li>• undertake actions in accordance with the project's due diligence framework;</li> <li>• enforce the project management philosophies, capabilities, processes and tools;</li> <li>• ensure project practices and on-site activities are conducted in accordance with project policies and procedures;</li> <li>• ensure personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP;</li> <li>• direct activities to ensure resource needs are accurately forecasted and linked to the project, including the identification of skill and behaviour requirements;</li> <li>• ensure resources are available to enable execution of project environmental management activities and project emergency response systems;</li> <li>• ensure resources are available to eliminate or minimise environmental hazards;</li> <li>• participate in incident investigations and review all incident reports as appropriate;</li> <li>• support negotiations with Transgrid to achieve an agreed resolution of complaints and non-conformance reports (NCR);</li> <li>• ensure all management plans are fully developed and implemented; and</li> <li>• attend and participate in environmental meetings as appropriate.</li> </ul>
<b>Project Operations Director</b>	<p>The environmental responsibilities of the Construction Manager include:</p> <ul style="list-style-type: none"> <li>• delivery of the construction aspects of the project;</li> <li>• ensure resources are available to eliminate or minimise environmental hazards;</li> <li>• ensure subcontractors understands their environmental responsibilities as required in the Contract;</li> <li>• participate in incident investigations and review all incident reports;</li> <li>• arrange and participate in HAZID workshops;</li> <li>• participate in workplace inspections;</li> <li>• review the audit findings and close out reports;</li> <li>• review the overall project environmental performance;</li> <li>• attend and participate in environmental meetings as appropriate;</li> <li>• participate in Target Zero commitment workshop;</li> <li>• review work planning requirements;</li> <li>• aware of the relevant environmental laws, permits and standards;</li> <li>• provide construction and field management and supervisors with environmental information current to their requirements;</li> <li>• ensure environmental standards developed for each activity meet with SecureEnergy requirements;</li> <li>• schedule and coordinate site-based environmental activities;</li> <li>• interface with client environmental personnel during their site visits; and</li> <li>• provide project line management with feedback on environmental performance.</li> </ul>
<b>Health, Safety, Security &amp;</b>	<p>The responsibilities of the Health, Safety, Security and Environment Manager include:</p>

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Role	Responsibilities
<b>Environment Manager</b>	<ul style="list-style-type: none"> <li>• deliver the HSSE aspects of the project in accordance with contract and legislative requirements;</li> <li>• communicate the HSSE requirements to the project Management and HSSE Teams;</li> <li>• review HSSE standards and plans developed for each project to ensure that legislative requirements are met;</li> <li>• review overall HSSE performance and report to the project Management and Corporate HSSE Manager;</li> <li>• interface with major subcontractors and Transgrid management, regulatory and with HSSE personnel as required regarding HSSE matters;</li> <li>• coordinate third party certification audits;</li> <li>• specify resources to enable execution of HSSE activities on site;</li> <li>• specify resources to enable execution of emergency response systems on site;</li> <li>• arrange for and participate in HAZID workshops;</li> <li>• provide HSSE Advisors, project line management and subcontractor with feedback on HSSE performance;</li> <li>• participate in the Target Zero commitment workshop;</li> <li>• implement and coordinate Target Zero activities and strategies;</li> <li>• receive and circulate relevant HSSE information;</li> <li>• coordinate and participate in scheduled HSSE audits and reviews;</li> <li>• statistical analysis and incident trend reviews;</li> <li>• develop training and induction schedules and content;</li> <li>• deliver the training and induction material such as site induction, toolbox talks and pre-start meetings;</li> <li>• attend and participate in HSSE meetings as required;</li> <li>• coordinate and participate in workplace inspections; and</li> <li>• record, monitor and follow up close out of action items in InControl.</li> </ul>
<b>Environmental Approvals Manager</b>	<p>The responsibilities of the Environmental Approvals Manager include:</p> <ul style="list-style-type: none"> <li>• communicate the environmental approval requirements to the Project Management and Environmental Teams;</li> <li>• communicate and liaise with Transgrid in relation to approval documents and matters;</li> <li>• develop and review the CEMP and SecureEnergy management plans;</li> <li>• review, and where required, revise environmental management documents;</li> <li>• review proposed project changes and where required, prepare consistency assessments. Where consistency assessments are required Transgrid’s Environmental Manager will be informed;</li> <li>• develop training and induction content, where required;</li> <li>• organise and participate in meetings as required; and</li> <li>• specify the resources required to develop environmental approval documents.</li> </ul> <p>The role of the Environmental Approvals Manager will be phased out depending on SecureEnergy’s requirements and the stage of the project.</p>
<b>Environmental Manager</b>	<p>The responsibilities of the Environmental Manager include:</p> <ul style="list-style-type: none"> <li>• implement and deliver the environmental requirements of the project;</li> <li>• communicate the environmental requirements to the Project Management and Environmental Teams;</li> <li>• communicate and liaise with Transgrid in relation to approved documents, environmental performance and compliance matters;</li> <li>• implement the CEMP and SecureEnergy management plans;</li> <li>• monitor and report compliance of the works in relation to the approved documents including the environmental objectives set in Table 4.2;</li> <li>• review, and where required, revise environmental management documents;</li> <li>• review proposed changes to design and construction methodologies and where required, communicate them to the Environmental Approvals Manager to determine if consistency assessments are required;</li> <li>• specify the resources required to enable execution of environmental activities on site;</li> </ul>

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Role	Responsibilities
	<ul style="list-style-type: none"> <li>• specify resources required to enable execution of emergency response systems on site;</li> <li>• arrange for and participate in HAZID workshops;</li> <li>• provide Environmental Advisors, project line management, and SecureEnergy with feedback on environmental performance;</li> <li>• participate in the Target Zero commitment workshop;</li> <li>• receive and circulate the relevant environmental information;</li> <li>• coordinate and participate in scheduled environmental audits and reviews;</li> <li>• undertake statistical analysis and environmental incident trend reviews;</li> <li>• develop training and induction content;</li> <li>• deliver the environmental component of training and induction such as site induction, toolbox talks and pre-start meetings;</li> <li>• promote environmental management improvements initiatives;</li> <li>• organise and participate in environmental meetings as required;</li> <li>• coordinate and participate in workplace inspections;</li> <li>• record, monitor and follow up close out of action items in InControl;</li> <li>• responsible for the overall environmental performance of the site;</li> <li>• provide leadership in the implementation of all environmental initiatives; and</li> <li>• specify the resources required to enable execution of environmental activities.</li> </ul>
<p><b>Environmental Advisors</b></p>	<p>The responsibilities of the Environmental Advisor include:</p> <ul style="list-style-type: none"> <li>• communicate the environmental requirements to project personnel including Superintendents and Supervisors;</li> <li>• being accountable for ongoing development and implementation of project environmental activities and practices;</li> <li>• record, monitor and follow up close out of action items;</li> <li>• develop and update environmental management documents;</li> <li>• ensure corrective actions are implemented;</li> <li>• participate in Target Zero workshops;</li> <li>• comply with statutory requirements, including duty of care;</li> <li>• liaise with supervisors on relevant environmental issues;</li> <li>• organise and participate in environmental meetings;</li> <li>• report and investigate all environment incidents in the area of control;</li> <li>• review and close out environmental incident reports;</li> <li>• deliver the environmental component of training and induction such as site induction, toolbox talks and pre-start meetings;</li> <li>• provide support and direction to all supervisors through positive discussions on environmental initiatives;</li> <li>• conduct weekly workplace inspections;</li> <li>• monitor high environmental risk activities and the commencement of activities in new areas or areas with significant environmental sensitivities;</li> <li>• support employees to perform their work in an environmentally conscious manner;</li> <li>• report all incidents and hazards to management;</li> <li>• monitor the use and maintenance of spill kits at all work sites; and</li> <li>• ensure work group employees participate in relevant environmental activities.</li> </ul>
<p><b>Supervisors</b></p>	<p>The environmental responsibilities of the Supervisors include:</p> <ul style="list-style-type: none"> <li>• plan for, and incorporating environmental management into all work plans and activities;</li> <li>• ensure that instructions are issued and adequate information provided to field-based employees which relate to environmental risks on site;</li> <li>• participate in HAZID workshops and audits;</li> <li>• motivate employees to report all environmental incidents;</li> <li>• participate in Target Zero workshops;</li> <li>• conduct inspections of their work area per the Audit and Inspection Schedule;</li> <li>• plan for and incorporate environmental management into all work plans and activities;</li> </ul>

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Role	Responsibilities
	<ul style="list-style-type: none"> <li>• open and maintain external communication during emergencies;</li> <li>• maintain a log of communications sent and received during an emergency;</li> <li>• report all incidents and hazards to management;</li> <li>• comply with statutory requirements, including duty of care;</li> <li>• report hazardous conditions;</li> <li>• participate in any relevant environmental training;</li> <li>• deliver the environmental component of training and induction such as toolbox talks and pre-start meetings;</li> <li>• provide suggestions to improve environmental management on the project;</li> <li>• report any near miss or environmental incidents; and</li> <li>• participate in site environmental meetings as required.</li> </ul>
<p><b>All personnel, including subcontractors</b></p>	<p>The environmental responsibilities of all personnel include:</p> <ul style="list-style-type: none"> <li>• undertake works in accordance with the Clough’s Management System and management plans;</li> <li>• follow directions from senior staff and project environmental personnel in relation to environmental matters;</li> <li>• follow the instructions in the WMS in relation to environmental matters;</li> <li>• participate in any relevant environmental training;</li> <li>• report any near miss or environmental incidents to their Supervisors; and</li> <li>• provide suggestions to improve environmental management on the project.</li> </ul>

**4.9.3 Other environmental resources**

Specialist consultants and subcontractors will be engaged for environmental support roles, as required, such as:

- ecologists for pre-clearing survey and assessment including tree hollows, identification of exclusion zones for retained threatened flora populations. Ecologist or fauna spotter for on-site fauna rescue and translocation during clearing activities;
- noise and vibration specialists for noise modelling, establishment and maintenance of monitoring equipment, and ongoing advice throughout construction;
- heritage consultants for review of the Aboriginal and non-Aboriginal heritage management sub-plans and archaeological survey, test excavations, salvage and reporting where required; and
- other resources as required during the course of the project.

**4.9.4 Subcontractors and suppliers**

All subcontractors will work in accordance with this CEMP, sub-plans and relevant procedures. Subcontractors are required to carry out their work in accordance with contract instructions and in an environmentally sound manner.

Subcontractors will not normally be required to prepare and implement a separate Environmental Management Plan in addition to this CEMP, except where the risk of environmental harm from the subcontractor’s activities is assessed as significant or the subcontractor has control of a specific project area. SecureEnergy will ensure that any separate Environmental Management Plans are consistent with this CEMP, the relevant conditions of approval and legislative requirements.

All subcontractor personnel are required to attend a project induction, which includes an environment and sustainability component and task-specific training (if relevant) before they commence any work on site. The Environmental Manager, or delegate, will confirm and implement requirements for effective subcontractor control based on known project risks and demonstrated subcontractor performance.

All suppliers will be required to comply with any relevant requirements of this CEMP and associated sub-plans, including sustainability requirements.

The Environmental Manager will confirm and implement actions to ensure suppliers and subcontractors are aware of the requirements within the CEMP that are relevant. This will occur during the procurement phase including final subcontractor and supplier assessment and selection and then carried through into the construction phase.



## 5 Environmental risk management

### 5.1 Risk and hazard management

Hazard and risk management approach will be used to determine the potential severity and likelihood of an activity's impact on the environment and to prioritise its significance.

Risk identification, assessment and management is part of the Clough Management System and will be undertaken in accordance with procedure *CORP-HSE-PR-G-0072 HSSE, Risk Management Procedure*. The procedure is consistent with *AS/NZS ISO 31000:2009 Australian Standard Risk Management*.

Over the life of the project, risks will be identified, assessed and controlled through the use of a number of different risk management tools, primarily risk assessments.

The objectives of undertaking risk assessments are to:

- identify activities, events or outcomes that have the potential to adversely affect the local environment and/or human health/property;
- assess hazards and risks and prioritised them using a consistent process aligned to Clough risk management principles;
- determine appropriate control measures;
- assess whether risk issues can be managed by the implementation of environmental management measures; and
- qualitatively evaluate residual risk with implementation of the protection measures.

Following identification and assessment the resultant control measures will be communicated, implemented and monitored to confirm their effectiveness. WMSs and Work Packs will be updated to provide specific instructions on how to conduct components of the construction. These will include the relevant environmental controls to be implemented which are identified through the risk assessment process.

Sensitive area plans will be used in conjunction with WMSs or Work Packs to help identify key risk areas and to promote ongoing communication to construction personnel during the project.

A summary of the Clough risk management processes, their purpose, the methodologies used and the stage in the project lifecycle to which they apply is provided in Table 5.1 and diagrammatically in Figure 5.1.

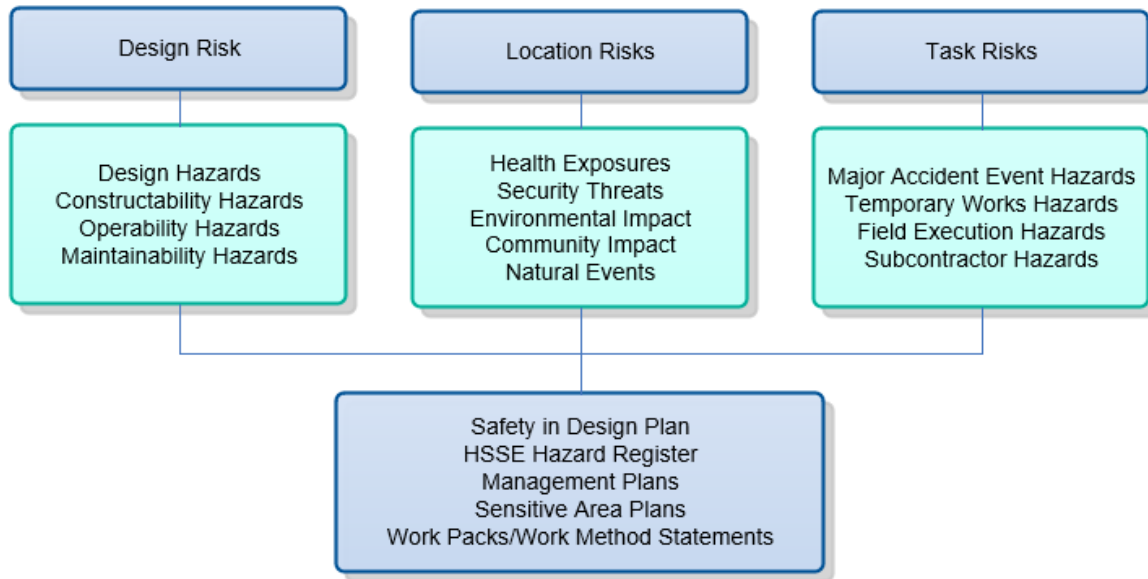
**Table 5.1 - Project HSSE Risk Assessment Processes**

Risk Assessment Process	Description	Methodology	Application						Reference Procedures	
			Corporate	Business Division	New Opportunity	Project Planning	Project Execution	Project Close-out		
<b>Technical HSSE Assessments</b>										
Design risks	Identify, assess and document inherent design risks	HAZID, HAZOP, FMEA			✓	✓			✓	Safety in Design Procedure CORP-ENG-PR-G-0016
Design reviews - construction, operation, maintenance	Identify, assess and mitigation of HSSE hazards introduced by the design when facility being	HAZID, HAZOP			✓	✓				Safety in Design Procedure CORP-ENG-PR-G-0016

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Risk Assessment Process	Description	Methodology	Application						Reference Procedures	
			Corporate	Business Division	New Opportunity	Project Planning	Project Execution	Project Close-out		
	constructed, operated or maintained									
Fire & Explosion analysis	Identify, assess and control potential sources of fire & explosion, and consequence mitigation through design	Fire and Explosion Study			✓	✓			Safety in Design Procedure	CORP-ENG-PR-G-0016
<b>Threat Specific HSSE Hazard Assessment (where applicable to project)</b>										
Environmental/Social Impact Assessment	Identify, assess and mitigate environment and community impacts	EIA, HAZID, Social Impact Study	✓	✓		✓			HSSE Risk Management Procedure	CORP-HSE-PR-G-0072
Natural Disasters Assessment (Emergency Events)	Identify, assess and mitigate potential natural disaster events which may affect the site (e.g. cyclone, wild fire, tsunami)	HAZID	✓	✓		✓			HSSE Risk Management Procedure	CORP-HSE-PR-G-0072
<b>Task Based HSSE Hazard Assessment</b>										
Project HSSE Assessment	Identify, assess and control potential HSSE impacts specific to the project & Site	HAZID				✓		✓	HSSE Risk Management Procedure	CORP-HSE-PR-G-0072
Construction Package HSSE Assessment	Identify, assess and control potential HSSE impacts specific to the Construction package	HAZID				✓	✓	✓	HSSE Risk Management Procedure	CORP-HSE-PR-G-0072
Subcontractor HSSE Assessment	Assess the HSSE capability of subcontractors to inform management strategy  Identify, assess and control potential HSSE impacts of contract scope	PRE-QUAL/HAZID				✓	✓	✓	HSSE Risk Management Procedure	CORP-HSE-PR-G-0072
Work Team Task Assessment	Work teams identify, assess and control HSSE hazards of planned work	JHA					✓	✓	HSSE Risk Management Procedure	CORP-HSE-PR-G-0072
Personal Task Assessment	Individuals identify, assess and control HSSE hazards of planned task	TAKE 5					✓	✓	HSSE Risk Management Procedure	CORP-HSE-PR-G-0072

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**Figure 5.1 - HSSE Risk Management Framework**

**5.2 Environmental aspect and impact register**

The environmental aspects of key construction activities and associated potential impacts will be continually identified, assessed and controlled throughout the project and included within the environmental risk register. The environmental aspect and impact register, provided in Appendix A3, will form a part of the consolidated risk register managed and reported in accordance with the *Risk Management Plan* (45860-QM-PL-G-1002).

The ongoing determination of environmental aspects and impacts will be achieved through the risk management processes outlined above, which results in the maintenance of a list of environmental risks (aspects and impacts), corresponding risk mitigation strategy and risk ranking for each risk. Each environmental risk is categorised, based on the following:

- the environmental aspect;
- type of potential impact (or consequence); and
- likelihood of occurrence.

Risk management measures are identified to reduce the environmental impacts of each activities to as low as reasonably practicable. These management measures are included in the Environmental Aspect and Impact Register. Risk management measures have been included in the relevant CEMP sub-plans, and will be addressed in relevant WMSs and communicated to the workforce as described in Section 4.4.

SecureEnergy will maintain the project risk register throughout the construction phase of the project. Risks will be required to be reviewed on a quarterly basis and will also be reviewed in response to incidents, changes in legal requirements, change in project scope, findings of inspections and audits and management reviews.

## 6 Training and awareness

Environmental training is an important means to raise environmental awareness and positively influence the attitude of workers engaged in the project whilst ensuring they are aware of their obligation and the requirements of this CEMP. Internal and on-the-job training will be provided by SecureEnergy on a regular basis for all employees and subcontractors.

Training will be delivered in accordance with the *HSSE Training Management Plan* (45860-HSE-PL-G-1011) with training and awareness delivered through:

- Target Zero leadership and behaviour programs;
- site inductions;
- toolbox talks;
- daily pre-start meetings; and
- WMS briefings and/or targeted environmental briefing e.g. erosion and sediment control, heritage and spill response.

Where required, the Environmental Manager (or delegate) will prepare and deliver the environmental components of the training material to highlight specific environmental and heritage sensitivities, risks and requirements related to the project or upcoming construction activities. Refer to the sections below for further detail.

### 6.1 Site induction

All personnel (including sub-contractors) will be required to attend a compulsory site induction that includes an environmental component prior to commencement on-site. This is done to ensure all personnel involved in the project are aware of the requirements of the CEMP and to ensure the implementation of environmental management measures. The Environmental Manager (or delegate) will prepare and deliver the environmental component of the site induction.

The environmental component will include an overview of the following elements:

- relevant details of the CEMP;
- relevant conditions of the Infrastructure Approval, environmental licences, permits and approvals;
- the location of key features of environmental and heritage sensitivity (i.e. heritage sites, threatened species and ecological communities, residences) and where this information can be found;
- relevant environmental management requirements and responsibilities;
- key management measures for the control of environmental issues;
- notification and response requirements in the event of unexpected finds (i.e. for heritage, contaminated land or threatened species);
- regulatory penalties and consequences of non-compliance;
- incident response and reporting; and
- emergency response and evacuation (fire and flooding).

### 6.2 Toolbox talks

Toolbox talks will be delivered by various SecureEnergy personnel such as the Construction Managers, Supervisors, Safety personnel and Environmental Manager (or delegate), depending on the primary focus and content of the toolbox talk. Toolbox talks are necessary to raise the workforce's level of project and environmental awareness. Toolbox talks will generally occur monthly.

Toolbox talks will be tailored to specific environmental issues relevant to upcoming works and current environmental performance matters and will include general and specific discussion of the key environmental aspects of the project. Examples of relevant environmental topics to be discuss during toolbox talks include:

- Aboriginal and non-Aboriginal heritage;
- biodiversity including biodiversity exclusion zones and clearing requirements;
- emergency and spill response;
- noise and vibration management levels;
- erosion and sedimentation control; and
- working hours and the out-of-hours work process.

### **6.3 Daily pre-start meetings**

Daily pre-starts meetings will be conducted by the Supervisors prior to the start of work each day to inform workers of key safety, environmental and heritage sensitivity, activity coordination considerations and other information that may be relevant in the performance of the day's work.

### **6.4 WMS briefing and/or targeted environmental briefing**

As outlined in Section 4.4, WMSs are developed as part of the preparation of every Work Pack. WMSs set out the construction methodology for a particular activity or set of activities, specific to the project and incorporate work-specific environmental risk assessments. WMS briefing will be delivered by the Construction Managers, Supervisors, the Safety Manager or the Environmental Manager (or their delegates) to communicate key requirements, actions, processes and controls to construction personnel.

Targeted environmental briefings 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. The targeted environmental briefing will communicate the potential environmental risks/impacts of the activity and the mitigation measures to reduce the environmental risk. Targeted environmental briefings where appropriate will also include any environmental requirements as outlined in the relevant WMS. Targeted environmental briefing will be delivered by Construction Managers, Supervisors, the Safety Manager or the Environmental Manager (or their delegates).

## 7 Communication and complaints management

### 7.1 Communication

SecureEnergy and Transgrid are committed to ensuring effective communication is undertaken on a regular basis at all levels of the project. A high level of communication is an important factor in the successful and correct delivery of environmental outcomes on the project and it will ensure environmental performance is continually communicated, understood and improved.

#### 7.1.1 Internal communication

The methods of internal (on-site) communication will include:

- inductions;
- toolbox talks;
- pre-start meetings;
- alerts, bulletins and / or initiatives; and
- Work Packs.

SecureEnergy will discuss environmental issues as a regular component of their toolbox and site meeting agenda.

SecureEnergy will present environmental communications to its workforce on a minimum weekly basis. This will include information on the management of environmental risks or key site environmental issues as required. Records of the topics, attendance and presenter's name will be maintained.

#### 7.1.2 External communication

A *Community Communication Strategy* (CCS) (45860-CM-PL-G-1001) has been prepared for the project. The CCS provides a framework in the management of community and stakeholder communication and engagement. The CCS identifies the community engagement objectives, the people and organisations that will be consulted with, the delivery framework and potential issues the project needs to manage during project delivery.

The CCS also provides information on the communication tools and protocols which will support implementation, and descriptions of how community stakeholders will be kept informed of, and consulted about, the project throughout the delivery phase.

In particular, the CCS details the following elements:

- identification of community and key external stakeholders;
- procedures and mechanisms for providing information to the community and key stakeholders;
- opportunities and provision for the community to attend the construction site for visits, taking into consideration health and safety requirements;
- the formation of issue or location-based community forums;
- procedures and mechanisms for how the project will receive and respond to community feedback, enquiries and complaints; and
- procedures that explains how disputes will be resolved.

The community and stakeholders will be kept informed through the below framework:

- inform – to provide balanced and objective information to assist in understanding a problem/options;
- consult – to obtain feedback on options and /or decisions;

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- involve - work with stakeholders to ensure concerns and aspirations are understood and considered; and
- collaborate – form a partnership with stakeholders in each aspect of the decision.

The communication approach to local communities and agencies is predominately aligned within the Inform and Consult stages with the focus on early consultation and providing up-to-date project information. There will however be opportunities in the Involve and Collaborate stage particularly through local employment, local supply chains and Aboriginal participation programs.

Communication tools which will be used by the project to inform stakeholders and the community will include:

- notifications of construction activities;
- notification of out of hours works (as required);
- written correspondence (letters/emails);
- advertisements (as required);
- newsletters;
- meetings;
- the project website which is located at <https://www.projectenergyconnect.com.au>; and
- enquiries and complaints line (24 hour) on 1800 560 577.

## 7.2 Complaints management

The protocol for managing and reporting any complaints is described in the *Enquiries, Complaint and Dispute Resolution Management Procedure (45860-CON-PR-G-1001)* provided in the CCS. The procedure includes a complaints management process which outlines how SecureEnergy will respond to complaints related to the project.

The complaints management process will use the Consultation Manager database to record information on all complaints received about the project during construction.

The key principles of the complaint management process is provided in Table 7.1 below. Refer to the CCS for further details.

**Table 7.1 - Key principles for effective complaint and dispute resolution**

Action	Description
Acknowledge	SecureEnergy staff should respect the communities’ right to voice their concerns. All complaints received should be acknowledged to the complainant either by telephone or in writing.
Resolve	SecureEnergy staff should aim at first contact resolution for all community concerns. SecureEnergy staff should investigate community concerns in detail before negotiating a resolution. All SecureEnergy staff should use their relevant discretions to achieve a mutually acceptable resolution to complaints.
Escalate	All SecureEnergy staff should aim to escalate the complaint if the community member remains dissatisfied with the investigation and/or resolution offered by their first point of contact at SecureEnergy. All complaints where community request to speak to a higher-level representative, should also be escalated.
Record	SecureEnergy staff should aim through the Engagement Team at recording all relevant information, on the community account in Consultation Manager System, regarding customer concerns along with details of all discussions had with the community member in the process of investigating and/resolving the complaint. Detailed information on the resolutions offered to address community concerns should also be clearly recorded.
Communicate	SecureEnergy staff should remain in constant touch with the community member while their concerns are being investigated. The community member should be informed of all steps of the investigation and the resulting outcome at appropriate times.

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Action	Description
Report	SecureEnergy should report on all complaints received to the SecureEnergy Management Team and Transgrid. The reporting should include information on the number as well as type of complaints being received, the status of these complaints from time to time and the resulting outcomes or resolutions offered to close them.
Feedback	The SecureEnergy Engagement Team should aim at regular and intensive reviews to identify possible trends in the complaints being received. These reviews should be aimed at highlighting improvements required to avoid complaints being repeated.
Action	SecureEnergy should aim at effective implementation of improvements suggested directly by the community or highlighted by complaint trends.

The complaints management system will include a process to manage complaints including receiving, recording, tracking and responding to complaints within a defined timeframe. If a complaint cannot be responded to immediately, a follow up phone call or verbal response will be made to the complainant in accordance with the timeframes detailed below.

The key processes involved in recording complaints and enquiries are as follows:

- all enquiries / complaints will be recorded in a complaint register;
- complaints received for the duration of the project will be acknowledged verbally within 2 hours from the time of complaint unless the complainant agrees otherwise. Any complaints received out of hours will be responded to on the next working day;
- complaints received via email will be acknowledged within 24 hours;
- complaints received via letters will be acknowledged within 5 business days of receipt. Where a phone number or email address is supplied, a response will be provided within 24 hours.

The project will aim to resolve complaints within an agreed timeframe (agreed to between the complainant and community engagement staff). The target would be for resolution to occur within 5 business days, however it is recognised that some complaints can be complex and further time may be required.

The community and stakeholder engagement staff will attend to enquiries and complaints received through the enquiries and complaints 1800 information line, project email address, from letters mailed to the project team, during community meetings or through construction / site staff.

The project enquiries and complaints 1800 number (1800 490 666) will be included on project communications, including notifications, advertisements, and on the SecureEnergy website.

All complaints will be investigated and dealt with impartially. All correspondence, agreements, resolutions and other relevant information will be recorded in Consultation Manager. If a complainant is not satisfied with the resolution provided, the complaint can be escalated, and alternative offers of resolution can be discussed. All complaints will be provided to the ER and a summary of complaints received, such as a complaints register, will be updated monthly on the project website.

### 7.2.1 Dispute resolution

Wherever possible, complaints will be resolved directly between SecureEnergy and the stakeholder.

If a complaints management process has been followed and the issue cannot be resolved, the *Enquiries, Complaint and Dispute Resolution Management Procedure (45860-CON-PR-G-1001)* provides a flowchart that outlines the process to manage and escalate complaints. As part of this procedure, a Community Complaints Mediator will be engaged to address any complaint where a member of the public is not satisfied by SecureEnergy’s response. The escalated review process will include an assessment of the details of the complaint received, any findings of the investigation undertaken in response to the complaint, and any further matters raised by the complainant.

If a complaint requires referral to senior management and Transgrid, the complainant will be informed of this and the outcome of the review process. DPE may request the Environmental Representative (ER) to assist in dispute resolution of community complaints.



## 8 Incidents and emergencies

### 8.1 Emergency preparedness and emergency response

Emergency management and planning including environmental emergencies will be undertaken in accordance with the Clough management system and relevant procedures. In line with Clough management system, a three-tiered approach will be adopted for major incidents:

- Level 1 – on site emergencies will be in accordance with the project specific *Emergency Preparedness and Response Plan* (45860-HSE-PL-G-1015);
- Level 2 – emergency situations where response exceeds the capacity of site resources incidents will be coordinated by the Incident Coordination Team in accordance with *Major Incident Coordination Plan* (CORP-HSE-PL-G-0002); and
- Level 3 – an emergency situation where the incident has the potential to, or has impacted, the business in terms of, reputation, and commercial liability. Incidents will be supported by the Major Incident Management Team in accordance with *Major Incident Management Plan* (CORP-HSE-PL-G-0001).

An *Emergency Plan* (45860-HSE-PL-D-0012) have been prepared for the project in accordance with condition D45 of the Infrastructure Approval. The plan focuses on bushfire emergency management and planning which includes identifying fire risk and hazards as well as management measures that will be implemented to prevent, mitigate or respond to risk of bushfires. The Emergency Plan will include a procedure that would be implemented if there is a fire on-site or in the vicinity of the site.

### 8.2 Environmental incidents

In the event of an environmental incident, the Incident, Notification and Investigation Procedure Flowchart provided Appendix A4 will be implemented. The flowchart applies to

- incidents causing harm to the environment (in excess of predicted impacts described and assessed in the EIS, Submissions Report, Amendment Report);
- incidents resulting in non-compliance with approvals, licences, permits, consents and other legislative requirements; and
- near misses including high potential incidents and/or hazards.

Environmental incidents may include the following events caused by the works:

- chemical spills and leaks (including hydrocarbons);
- accidental spills or other incidents associated with the wastewater treatment plants;
- unauthorised discharge of contaminated waters to the environment;
- unauthorised/unapproved impact to heritage items, artefacts or sites;
- clearing or damage to vegetation outside of the designated clearing areas;
- unauthorised/unapproved damage or interference to threatened species, endangered ecological communities or critical habitat;
- unauthorised death or injury of native fauna;
- any non-compliance with legislation; and
- inappropriate waste disposal.

All efforts will be undertaken to avoid and reduce impacts of incidents. All site personnel are authorised to suspend a work activity that is likely to cause or actually causing or contributing to an incident. A supervisor/manager may request additional staff be deployed to the site to provide additional capacity or capability to manage the incident.

### 8.3 Incident notification and reporting

All environmental incidents that occur on the project, regardless of how minor, must be reported to a supervisor by personnel involved or witnesses to the incident immediately after the incident occurs. The Environmental Manager will be notified immediately of any environmental incident. The Environmental Manager will confirm whether the incident has caused or threatens material environmental harm under the POEO Act.

Transgrid will be notified of incidents and near misses immediately. Formal, documented reporting of incidents will be completed using InControl, and will be submitted to Transgrid in accordance with requirements under the Contract. The Environmental Representative will be included on all incident notifications.

If required, all external communication and reporting to the community and stakeholders will be in accordance with the CCS.

#### 8.3.1 Incident reporting in accordance with the Infrastructure Approval

An incident is defined in the Infrastructure Approval as ‘*An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance*’. In addition, material harm is defined in the Infrastructure Approval as the following:

*[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).*

*This definition excludes “harm” that is authorised under either this approval or any other statutory approval.*

The protocol for managing and reporting incidents will be in accordance with condition E6 and Appendix 3 of the Infrastructure Approval. As such, Transgrid will notify DPE via the Major Projects website immediately after becoming aware that an incident has occurred. A written notification will then be provided to DPE via the Major Projects website within seven days after becoming aware of the incident. SecureEnergy will provide the appropriate details to assist Transgrid. The written notification will include the following details:

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

Within 30 days of the date on which the incident occurred, or as otherwise agreed by the Planning Secretary, Transgrid will provide DPE and any relevant public authorities with a detailed report on the incident addressing the following requirements, and any further reports that may be requested.

- a summary of the incident;

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

Corrective and preventative actions will be identified from the incident reports and if required, this CEMP and CEMP-sub-plans will be updated in accordance with Section 1.10.

### **8.3.2 Incident reporting in accordance with the EPBC Act**

SecureEnergy will notify Transgrid of any event that impacts or has the potential to impact upon protected matters, as defined under the EPBC Act, immediately on becoming aware of the occurrence. Appropriate details will be provided to assist Transgrid in notifying DAWE in accordance with the requirement of the EPBC Act.

### **8.3.3 Incident reporting in accordance with the POEO Act**

SecureEnergy will notify Transgrid immediately after becoming aware of pollution incidents that causes or threatens material environmental harm to the environment.

Following initial verbal notification to Transgrid, SecureEnergy will notify the following

- appropriate regulatory authority;
- the EPA (if they are not the appropriate regulatory authority);
- the local authority (if the EPA is the appropriate regulatory authority);
- Ministry of Health;
- SafeWork NSW; and
- Fire and Rescue NSW.

The circumstances where this will take place include:

- if the actual or potential harm to the health or safety of human beings or ecosystems is not trivial; and
- if actual or potential loss or property damage (including clean-up costs) associated with an environmental incident exceeds \$10,000.

Any incidents that present an immediate threat to human health or property are to be reported immediately to 000.

### **8.3.4 InControl Data Entry**

All incident notifications and investigations shall be entered into the incident management system (InControl). This system shall also act as the Incident Register and allows the project to monitor and analyse incident trends. <http://inx.australia.corp.clough.com/InControl/Default.aspx>

## 9 Inspections, monitoring and auditing

### 9.1 Environmental inspections

Implementation of a regular program of inspections is an essential part of the success of work activities. The current proposed inspection schedule is provided in Table 9.1.

The implementation and effectiveness of environmental protection measures described in this CEMP and sub-plans will be inspected and assessed on a weekly basis. A weekly checklist for environmental inspections will be developed, with the purpose of the checklist to:

- provide a surveillance tool to ensure that safeguards are being implemented;
- assess and document the effectiveness of implemented environmental management measures;
- identify where problems might be occurring;
- identify where sound environmental practices are not being implemented; and
- facilitate the identification and early resolution of problems.

Deficiencies and required actions will be analysed and prioritised at the completion of the inspection and timeframes for implementation of corrective actions agreed. Any non-conformances identified through the checklist process will be highlighted and an environmental inspection report (minor issues) or an environmental incident report completed.

SecureEnergy environmental staff and Transgrid environment staff might jointly undertake regular inspections of works sites, and in particular critical activities throughout construction of the project. The frequency of these inspections would vary depending on the complexity and anticipated risks associated with the stage of construction.

**Table 9.1 - Inspection schedule**

Activity	Frequency	Location	Responsibility	Record
Daily work site inspections	Daily	Immediate work area and equipment in work area	Supervisors	HSSE inspection entry Pre-start sign on
Pre-start equipment inspections	Daily	The equipment/machinery being used	Equipment/machinery operators	Pre-start checklist
Environmental site inspection	Weekly	Site wide	SecureEnergy Environmental Manager, Supervisors or nominated representative	Site inspection checklist
High risk works inspections	Prior to undertaking of high risk activities	In areas of high environmental sensitivity	SecureEnergy Environmental Manager or nominated representative	Pre-start checklist
Joint environmental site inspection	As required	Site wide	Transgrid, SecureEnergy Environmental Manager or nominated representative	Transgrid inspection report

### 9.2 Monitoring

Monitoring will be undertaken to validate the impacts predicted for the project, to measure the effectiveness of environmental controls, and to address any relevant approval requirements.

The activity, description, timing, frequency of proposed monitoring and the relevant CEMP sub-plans in which specific details will be included is summarised in Table 9.2. The monitoring programs range from those involving formal sample collection, analysis and measurement, to those involving a more

qualitative assessment. Refer to the relevant CEMP sub-plans for details on the respective monitoring and inspection requirements.

**Table 9.2 - Environmental monitoring summary**

Condition / RMM	Activity	Management Plan	Description	Frequency and timing
Condition D25 RMM B15	Clearing supervision	Biodiversity Management Plan	Ecological supervision of clearing operations during removal of habitat trees	In accordance with BMP
RMM LP7	Biosecurity	Biodiversity Management Plan	Visual inspection of the work site and implemented management measures to minimise the risk of off-site transportation of weeds	In accordance with BMP
RMM HF3	Water quality monitoring program	Soil and Water Management Plan	Monitor the water quality conditions in the Darling River, Darling Anabranch and Murray River.	In accordance with SWMP
Condition D19	Dewatering	Soil and Water Management Plan	Monitoring requirements associated with dewatering activities.	In accordance with SWMP, Dewatering procedure and permit to dewater
Condition D14 RMM NV5 RMM NV8	Noise and vibration monitoring	Noise and Vibration Management Plan	Noise and vibration monitoring program to compare the actual noise and vibration performance during construction against predicted performance.	In accordance with NVMP
Condition D32	Monitoring of the management measures in place to protect heritage features	Heritage Management Plan	Visual inspection of work site, including any fencing along the disturbance boundaries	In accordance with HMP
Condition D38	Traffic and transport monitoring	Traffic and Transport Management Plan	Monitoring of access track conditions, traffic signage and congestion impacts to level of service, and driver code of conduct.	In accordance with TTMP

Irrespective of the type of monitoring conducted, the results will be used to identify potential or actual problems arising from construction processes. Where monitoring results are outside of the expected range, the following process will be implemented. Refer to the specific CEMP sub-plan for further details:

- the results will be analysed by the SecureEnergy Environmental Manager or Environmental Advisor with the view of determining possible causes for the exceedance including a review of the potential construction activities impacting that site of the exceedance;
- a site inspection will be undertaken (where appropriate to assess potential cause);
- where the exceedance relates to construction impacts, the mitigation measures will be reviewed; and
- where required, the appropriate corrective and preventative action will be identified and implemented.

### 9.3 Auditing

The purpose of auditing is to assess compliance with the CEMP, the Infrastructure Approval and any relevant legal and other requirements (e.g. licences, permits, regulations, contract documentation) and to form a part of continuous improvement described in Section 1.9.

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In accordance with condition E11 of the Infrastructure Approval, independent audits will be undertaken in accordance with the *Independent Audit Post Approval Requirements (2020)*. Independent audit will be undertaken within 12 weeks from the commencement of construction, follow by six-monthly interval for each subsequent audit until the completion of the construction phase of the project.

The independent audits will be undertaken in accordance with the requirements set out in Section 3 of the *Independent Audit Post Approval Requirements (2020)*. At the end of each audit, the auditor is to prepare an independent audit report. The report includes details such as the audit methodology, audit findings and recommendations and opportunities for improvement. SecureEnergy will review the draft report and provide a response of the audit findings. If the audit findings identifies any non-compliance, the nominated action and completion timing of the action will be provided as part of the response to each non-compliance.

The submission of the independent audit report and SecureEnergy's response to the audit findings will be submitted to the Department no later than two months from the date of the independent audit site inspection.

Corrective and preventative actions will be identified from the audit findings, and the implementation of those actions managed and monitored as per the process outline in Section 11.

## 10 Reporting

### 10.1 Reporting non-compliances

#### 10.1.1 Reporting non-compliances in accordance with the Infrastructure Approval

Non-compliance is defined in Infrastructure Approval as ‘*an occurrence, set of circumstances or development that is a breach of this approval*’. The procedure to respond to any non-compliance will be in accordance with condition E7 of the Infrastructure Approval. As such, the Planning Secretary will be notified in writing via the Major Projects website within seven days after Transgrid becomes aware of any non-compliance. SecureEnergy will provide the appropriate details to assist Transgrid. The written notification will include details such as:

- the non-compliance;
- the reasons for the non-compliance (if known); and
- what actions have been taken, or will be taken, to address the non-compliance.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

#### 10.1.2 Reporting non-compliances in accordance with the EPBC Act

SecureEnergy will notify Transgrid of any event that impacts or has the potential to impact upon protected matters, as defined under the EPBC Act, immediately on becoming aware of the occurrence. Appropriate details will be provided to assist Transgrid in notifying DAWE in accordance with the requirement of the EPBC Act. Transgrid will notify DAWE in writing of any non-compliance with the conditions or commitments made in plans as defined under the EPBC Act Approval.

#### 10.1.3 Other reporting and notification requirements

SecureEnergy is required to prepare and submit various reports to Transgrid and/or the Department and to undertake reporting required under the Infrastructure Approval. A summary of these reports is provided in Table 10.1.

**Table 10.1 - Other reporting requirements**

No	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report	For incorporation in project Monthly Reports.	Monthly	SecureEnergy Environmental Manager	Transgrid
2	Incident Report	Provide written notification within seven days of becoming aware of the incident. Provide a report on the incident within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary.	Incident notification within seven days of becoming aware of the incident. Incident report within 30 days after the incident has occurred	SecureEnergy / Transgrid	DPE
3	Non-compliance notification	Planning Secretary must be notified within 7 days after identifying the non-compliance.	As required	SecureEnergy / Transgrid	DPE
4	Independent audit report	As per the reporting requirements in the <i>Independent Audit Post Approval Requirements</i> (2020).	Within 12 months of the commencement of construction and at six-monthly intervals for subsequent reports	SecureEnergy / Transgrid	DPE

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No	Report	Requirement	Timing	Responsibility	Recipient
5	Pre-construction dilapidation report	As per condition D37 of the Infrastructure Approval.	Prior to the commencement of construction	SecureEnergy	DPE
6	Post-construction dilapidation report	As per condition D37 of the Infrastructure Approval.	Within one month of completion of construction or on an annual basis	SecureEnergy	DPE



## 11 Non-conformance, corrective and preventative action

A non-compliance is the failure to comply with the requirements of this CEMP, sub-plans and associated documents such as Infrastructure Approval and relative legislations.

A non-conformance is the failure to meet the procedural requirements and processes developed for the project such as work packs and WMS, or internal permits that forms part of the environmental management system.

Where a non-conformance and/or non-compliance has been identified, corrective actions will be developed as required and implemented to address the non-conformance that occurred. While preventative actions will be developed as required and implemented to minimise the potential for recurrence. In the event of a non-conformance the following will occur:

- the nature of the event will be investigated by the Environmental Manager;
- the effectiveness or need for new/additional controls will be reviewed;
- appropriate preventative and corrective actions will be developed and implemented; and
- the relevant environmental management practices and procedures implemented for the construction will be reviewed and revised.

Corrective and preventative actions may be generated from a number of sources, including but not limited to incidents, audits and management reviews. The actions will be systematically managed in accordance with the Clough management system to ensure that the required actions are tracked and closed out in a timely manner.

The completion of the required actions will be recorded. The action records will include details on the source of the action (e.g. audit, inspection or other), the action required, target close out date, actual close out date and the person responsible for the action item.

If the actions require changes to the CEMP and sub-plans, the update will occur as described in Section 1.10.

## 12 Contingency plan

Although the project has been assessed through the environmental impact assessment process and potential impacts identified, unpredicted impacts may occur as the project progresses. In the event that unexpected impacts are identified, the action or cause will be categorised and as required will be managed as:

- an emergency or environmental incident in accordance with Section 8; and/or
- a non-compliance or non-conformance in accordance with Section 11.

Reporting of the unpredicted impacts would be in line with the processes as described in Section 10.

Through the identification of corrective and/or preventative actions through the processes as described in Section 11, the following steps will be considered as relevant:

- a) determine the relevant impact assessment criterion/criteria, below which the impact should be reduced, consistent with the requirements of this CEMP and CEMP sub-plans;
- b) identify options to reduce the unexpected impacts to below the relevant criterion/criteria and appropriate timeframe for implementation;
- c) implement the selected measure(s) to reduce the unexpected impacts; and
- d) identify and implement an appropriate monitoring program to determine the effectiveness of the selected measure(s) to reduce the unexpected impact.

If the above monitoring program identifies that the unexpected impacts have not been reduced to below the nominated criterion/criteria, items b) to d) of the contingency process will be repeated.

This section does not apply to unexpected heritage, biodiversity or contamination finds. These will be managed in accordance with their respective Unexpected Finds Procedure.

## 13 Documentation

### 13.1 Records

The Environmental Manager is responsible for maintaining all environmental management documents. Further to Section 4.8, the following records are those that will be generated through delivery of the project:

- monitoring and inspection records;
- correspondence with public authorities;
- induction and training records;
- site specific records such as those prepared for dewatering and water management, out of hours works, clearing records, unexpected finds etc;
- waste classification records, waste disposal and recycling records for transporting and disposing of waste;
- plans, strategies and reports, and revisions thereof, to ensure compliance with the Infrastructure Approval;
- reports on environmental incidents, environmental non-conformances, and corrective actions;
- monthly reports and annual reports; and
- audit reports.

All environmental management documents are subject to ongoing review and continual improvement.

### 13.2 Document and data control

The Environmental Manager will coordinate the preparation, review and distribution, as appropriate, of the environmental documents listed above. During construction, environmental documents will be stored at the main site office and can be accessed on request to the SecureEnergy Environmental Manager.

The *Project Document Control Plan* (45860-IM-PL-G-0003) will be used to control the flow of documents and data within the SecureEnergy teams and between the SecureEnergy and Transgrid, stakeholders and sub-contractors.

Documents and data that are to be issued and liable to change will be controlled to ensure that they are approved before issue and that the current issue or revision is known to and available to those requiring them. Controlled documents and data will be uniquely identified and will bear a defined revision number recorded on each page of the document.

After a number of changes have been made to a document it will be withdrawn and reissued as a new revision. Data will be issued on a revision basis only. Obsolete documents and data may be kept for contractual or other reasons but will be clearly marked 'superseded'.

## Appendix A1 – Legal and other requirements

## Legislation

Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
<b>Commonwealth Legislation</b>					
<i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)	Proposed action	Section 28	A person must not take an action that has, will have or is likely to have a significant impact on any of the matters of national environmental significance without approval.	<p>Yes, the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) aims to protect matters of national environmental significance (MNES) including national heritage places.</p> <p>Following referral of the project to Department of Environment, Agriculture and Water, the project was determined on 25 June 2020 to be a controlled action under section 75 of the EPBC Act, and therefore required further assessment and approval under the <i>Environment Protection and Biodiversity Conservation Act 1999</i>. The referral number is EPBC 2020/8673.</p> <p>The EPBC Act controlling provisions for the proposed actions are:</p> <ul style="list-style-type: none"> <li>listed threatened species and communities (section 18 and 18A). It should be noted that no MNES were identified in the EIS or Amendment Report for the project.</li> </ul>	Transgrid
	Bilateral Agreement	Chapter 3 Clause 45	A bilateral agreement is a written agreement between the Commonwealth and a State with the intention of protecting the environment, promoting the conservation and ecologically sustainable use of natural resources, ensuring an efficient, timely and effective process for environmental assessment and approval of actions and to minimising duplication in the environmental assessment and approval process.	EnergyConnect (NSW - Western Section) will be assessed using the bilateral assessment process in accordance Amending Agreement No. 1.	Transgrid
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Protection of areas and objects	Section 10	Comply with any declarations relating to the project area	No declarations have been made relating to the project area. In the event that declarations are made, this HMP will be updated if required.	Transgrid SecureEnergy
		Section 20	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy

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EnergyConnect (NSW - Western Section) Stage 2 Construction Environmental Management Plan

Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
		Section 22	Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.	Yes, a Heritage Management Plan has been prepared and will be implemented for the project to outline the compliance requirements for the declared Aboriginal areas or objects within the project footprint.	Transgrid SecureEnergy
<i>Native Title Act 1993</i>	Native Title Land	All	Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.	The project area intersects with the Barkandji Traditional Owners #8 (Part A) native title area (determined). Barkandji Traditional Owners will be included in consultation and archaeological survey for the project.	Transgrid SecureEnergy
<b>New South Wales Legislation</b>					
<i>State Environmental Planning Policy (State and Regional Development) 2011</i>	All	Part 3 Clause 13	Declaration of critical State Significant Infrastructure	On 29 August 2019 the NSW Minister for Planning and Public Spaces declared EnergyConnect critical State significant infrastructure (CSSI) under the <i>State Environmental Planning Policy (State and Regional Development) 2011</i> on the basis that it is critical to the State for environmental, economic or social reasons. The project may be carried out without development consent under Part 4 of the EP&A Act, however application for approval of the CSSI is required.	Transgrid
<i>Environmental Planning and Assessment Act 1979 (EP&amp;A Act)</i>	All	Section 5.5	A determining authority has the duty to fully consider the environmental impact (including Aboriginal or non-Aboriginal heritage) of an activity and is required to 'take into account the fullest extent possible all matters affecting, or likely to affect the environment arising from the proposal.	The EnergyConnect (NSW - Western Section) - Environmental Impact Statement was submitted to Department of Planning, Industry and Environment in October 2020 and publicly exhibited between 26 September 2019 and 10 December 2020. On 14 April 2021, the response to submissions was finalised in the EnergyConnect (NSW – Western Section) – Submissions Report. A separate EnergyConnect (NSW – Western Section) – Amendment Report, to document design changes and additional environmental assessment undertaken, was also finalised on 14 April 2021. Transgrid prepared and provided a memorandum titled EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions to DPIE on the 10 August 2021 in response to DPIE requested additional information (EnergyConnect (NSW –	Transgrid

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Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				Western Section)(SSI-10040) Request for Additional Information).	
		Section 5.19	Approval of the Minister required to carry out critical State significant infrastructure (CSSI). Comply with the conditions of the Infrastructure Approval and the revised management measures from the Submissions Report.	The project requires approval from the NSW Minister for Planning and Public Spaces under Division 5.2, Part 5 of the EP&A Act. The project was assessed as above. Approval for EnergyConnect (NSW – Western Section) was granted by the Minister for Planning and Public Spaces.	Transgrid
<i>Roads Act 1993</i>	Road usage	Section 138	Road occupancy licences (ROLs) required for any activity likely to impact on traffic flow. ROL may be required from TfNSW or Wentworth Shire Council based on road owner.	A Road Occupancy Licence (ROL) will be obtained for all activity likely to impact the operational efficiency of the road network, as required by the relevant road authority. The licence applies to the occupation of the road corridor only and does not grant approval for the works being undertaken.	SecureEnergy
<i>Biodiversity Conservation Act 2016</i> (BC Act)	Flora and Fauna	All	Legislation responsible for the conservation of biodiversity in NSW through the protection of threatened flora and fauna species, populations and Endangered Ecological Communities (EECs). The <i>Biodiversity Conservation Act 2016</i> , together with the <i>Biodiversity Conservation Regulation 2017</i> , established the Biodiversity Offsets Scheme which is outlined below.	The biodiversity impacts of the project have been assessed in accordance with the BC Act, which includes the Biodiversity Assessment Method (BAM) and documented in a Biodiversity Development Assessment Report (BDAR). A Biodiversity Management Plan has been prepared and will be implemented for the project to manage the conservation and protection of threatened flora and fauna.	Transgrid
		Part 6 Division 1 Clause 6.2	This Act, and the <i>Biodiversity Conservation Regulation 2017</i> , outlines the framework for addressing impacts on biodiversity from development and clearing. Biodiversity Offsets Scheme is a framework to avoid, minimise and offset impacts on biodiversity from development and clearing, and to ensure land that is used to offset impacts is secured in-perpetuity. Biodiversity Offsets Credits.	As part of the assessment under the BC Act, the biodiversity offset credits has been estimated for the project and are outlined in the BDAR. Biodiversity Offset Credits is applicable for clearing on the project. Transgrid as the proponent will retire the full biodiversity offset credit liability of the development.	Transgrid
<i>Fisheries Management Act 1994</i>	Taking or possessing fish or marine vegetation	Section 37	Permit to take and possess fish or marine vegetation	A section 37 permit is required for any activity that involves taking or possessing fish or marine vegetation that would otherwise be unlawful under the <i>Fisheries Management Act 1994</i> including any collecting activities.	Transgrid SecureEnergy

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EnergyConnect (NSW - Western Section) Stage 2 Construction Environmental Management Plan

Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				There is currently no intention to take and possess fish or marine vegetation, however in the event that this is required, a permit would be developed.	
	Mangroves, seagrasses and marine vegetation	Section 205	Do not harm any mangroves, seagrasses or other marine vegetation on public water land protected by the regulations without a permit.	As the project has been declared as Critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, section 205 of the <i>Fisheries Management Act 1994</i> does not apply.	Not applicable
	Fish passage	Section 219	Do not block fish passage without a permit	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, section 219 of the <i>Fisheries Management Act 1994</i> does not apply.	Not applicable
<i>Biosecurity Act 2015</i>	Weeds and Pest Management	Section 22	Under Part 3 of the Biosecurity Act 2015, landowners or land managers have a general biosecurity duty to prevent, eliminate or minimise the biosecurity risk posed or likely to be posed by priority weeds. A biosecurity risk exists where priority weeds have the potential to negatively impact on agriculture, industry, the liveability of our city, human health or the environment. Invasive weeds are known as 'Biosecurity Matter' or 'Priority Weeds'.	Biosecurity matters will be discussed with the affected landholders and addressed in project management plans for each property	Transgrid
<i>Local Land Services Act 2013</i>	Clearing of native vegetation in regulated rural areas	Part 5A Division 3 Clause 60N and Clause 60O	Clause 60N details the offence to clears native vegetation in a regulated rural area. Clause 60O details the planning approval and authorisation for clearing native vegetation in a regulated rural area.	Yes, as detailed 60O (b) of the Act, approval and authorisation for clearing native vegetation in a regulated rural area is subject to approval of the project under Part 5 of the EP&A Act. Infrastructure Approval will satisfy this compliance requirement.	Transgrid
<i>National Parks and Wildlife Act 1974 (NP&amp;W Act)</i>	Aboriginal places and objects	Part 6 Division 2 Clause 90	This Act provides protection for Aboriginal cultural heritage in NSW, including Aboriginal objects and declared Aboriginal places. Section 86 creates the offence and section 90 creates the requirement to obtain a permit to impact an Aboriginal object, place, land, activity or person.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, section 90 of the <i>National Parks and Wildlife Act 1974</i> , which outlines the requirements for Aboriginal heritage impact permits, does not apply.	Not applicable
		Part 6 Division 1 Clause 89A	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy

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EnergyConnect (NSW - Western Section) Stage 2 Construction Environmental Management Plan

Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
<i>Native Title Act 1994</i>	Native Title Land	All	Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.	The project area intersects with the Barkandji Traditional Owners #8 (Part A) native title area (determined). Barkandji Traditional Owners will be included in consultation and archaeological survey for the project.	Transgrid SecureEnergy
<i>Rural Fires Act 1997</i>	Bushfire prone land	Section 100B	Bush fire safety authorities	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 100B of <i>Rural Fires Act 1997</i> does not apply.	Not applicable
<i>Heritage Act 1977</i>	Heritage	Section 57	Do not undertake an activity that will affect a place, building, work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 57 (1) of <i>Heritage Act 1977</i> does not apply.	Not applicable
		Section 139	An excavation permit is required under certain circumstances. A person must not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or a person must not disturb or excavate land on where a relic has been discovered or exposed.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 139 of <i>Heritage Act 1977</i> does not apply.	Not applicable
		Section 146	A person who is aware or believes that he or she has discovered or located a relic must within a reasonable time notify the Heritage Council of the location of the relic, unless he or she believes on reasonable grounds that the Heritage Council is aware of the location of the relic, and within the period required by the Heritage Council, furnish the Heritage Council with such information concerning the relic as the Heritage Council may reasonably require.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy
<i>Water Management Act 2000 (WM Act)</i>	Water access licence	Section 60A	Do not take water from a water source (a lake, river or estuary or place where water occurs naturally on or below the surface of the ground and includes coastal waters) without an access licence.	Yes, the WM Act applies to areas of New South Wales that have a water sharing plan. The project area is subject to the following water sharing plans: <ul style="list-style-type: none"> <li>NSW Murray Darling Basin Fractured Rock Groundwater Sources 2011, Lachlan Fold Belt Murray Darling Basin Groundwater Source; and</li> </ul>	SecureEnergy

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Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				<ul style="list-style-type: none"> <li>• Darling Alluvial Groundwater Sources – including unconfined aquifers with high connectivity to the Darling River</li> <li>• NSW Murray Darling Porous Rock Groundwater Sources – including remaining unconfined, semiconfined and confined aquifers.</li> </ul> <p>Section 60A of the WM Act requires that a water access licence (WAL) be obtained to extract water from a water source.</p> <p>Section 21 and Schedule 4 of the <i>Water Management (General) Regulation 2018</i> does however provide exemptions for the requirement to obtain water access licences. Relevant exemptions from Part 1 of Schedule 4 are detailed below:</p> <ul style="list-style-type: none"> <li>• clause 7 provides an exemption for water taken in the course of certain aquifer interference activities carried out in connection with an authorised project - in relation to taking up to 3 ML of groundwater from a groundwater source; and</li> <li>• clause 17A provides exemption for the taking of groundwater for excavation works where they are a holder of a water supply work authority in relation to taking of more than 3 ML of groundwater.</li> </ul> <p>Any other water required for construction purposes would however require a water access licence. This includes extraction for:</p> <ul style="list-style-type: none"> <li>• interception activities (i.e. intercepted groundwater during piling);</li> <li>• potable uses for human consumption associated with the accommodation camp.</li> </ul>	
	Impacts to water supply work and water use Activity approvals	Section 89 Section 90 Section 91	<p>Under Section 89, a water use approval confers a right on its holder to use water for a particular purpose at a particular location.</p> <p>Under Section 90, approval is required for the authorisation to construct and use a specified water supply work such as pumps, bores, spear points or wells at a specified location, drainage work or flood work.</p>	<p>Section 5.23 of the EP&amp;A Act provides that 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 do not apply to state significant infrastructure.</p> <p>An activity approval is therefore not required, however an aquifer interference licence is required when an activity involves any of the following:</p> <ol style="list-style-type: none"> <li>a) the penetration of an aquifer,</li> </ol>	SecureEnergy

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Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
			<p>Under Section 91, there are two kinds of activity approvals, controlled activity approvals and aquifer interference approvals.</p> <p>A controlled activity approval is required for carrying out a specified controlled activity at a specified location in, on or under waterfront land.</p> <p>An aquifer interference approval is required for carrying out one or more specified aquifer interference activities at a specified location, or in a specified area.</p>	<p>b) the interference with water in an aquifer,                      c) the obstruction of the flow of water in an aquifer,                      d) the taking of water from an aquifer in the course of carrying out mining, or any other activity prescribed by the regulations,                      e) the disposal of water taken from an aquifer as referred to in paragraph (d).</p> <p>However, an aquifer interference licence is not required if an activity ensures that no more than minimal harm will be done.</p> <p>Stated under Section 3.3 of the <i>NSW Aquifer Interference Policy</i>, there are a number of activities that are considered as having a minimal impact on water dependent assets which includes monitoring bores and wells that are required by a development consent under Part 4 or an approval under Part 5.1, of the EP&amp;A Act, or required or undertaken as a result of an environmental assessment under Part 5 of EP&amp;A Act. Since the environmental assessment for the project requires the confirmation of groundwater level. An aquifer interference licence is not required</p>	
<i>Protection of the Environment Operations Act 1997 (POEO Act)</i>	Scheduled activity	Section 47 Section 48	Do not carry out or allow an activity listed in Schedule 1, or carry out work to enable such an activity, unless the premises are licensed by the EPA.	<p>An Environment Protection Licence (EPL) is required for the carrying out of scheduled activities as listed under Schedule 1 of the Act. An EPL is likely to be required for the following scheduled activities:</p> <p style="padding-left: 40px;">16 Crushing, grinding or separating</p> <p>An EPL is required if there is a capacity to process more than 150 tonnes of material per day or 30,000 tonnes per year. The need for a crushing or screening plant will not be known until further geotechnical investigation works have occurred. Should a crushing or screening plant be required and the capacity needed is more than 150 tonnes per day or 30,000 tonnes per year, then an EPL will be obtained.</p>	SecureEnergy
	Harming the environment	Section 115 Section 116 Section 117	<p>Do not risk harming the environment by wilfully or negligently:</p> <ul style="list-style-type: none"> <li>• disposing of waste unlawfully.</li> <li>• causing any substance to leak, spill or otherwise escape (whether or not from a container); or</li> </ul>	Yes, the relevant management measures are included within the Soil and Water Management Plan, Waste Management Plan and Air Quality Management Plan.	SecureEnergy

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Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
			<ul style="list-style-type: none"> <li>causing any controlled substance to be emitted into the atmosphere.</li> </ul>		
	Water pollution	Section 120 Section 122	Do not cause water pollution (other than to a sewer), except in accordance with the conditions of any EPA licence.	Yes, the relevant management measures have been incorporated within the Soil and Water Management Plan.	SecureEnergy
	Land pollution	Section 142	Do not cause or permit land pollution other than under authority of a licence or regulation (however it is not a land pollution offence to place virgin excavated natural material or lawful pesticides and fertilisers on land, or by placing matter on land that has been notified to the EPA as an unlicensed landfill and which is operated in accordance with the regulations	Yes, the relevant management measures have been incorporated within the Soil and Water Management Plan.	SecureEnergy
	Notification of pollution incidents	Section 148	Notify the EPA immediately of pollution incidents where material harm to the environment is caused or threatened.	Yes, notification requirements are detailed in Section 8 of this CEMP.	SecureEnergy
	Prepare PIRMP if EPL required	Section 153A-F	Requires the holder of an EPL to prepare a pollution incident response management plan (PIRMP)	A PIRMP will be prepared as part of the EPL, if an EPL is required.	SecureEnergy
	Plant maintenance and operation	Section 139	Do not operate plant if it emits noise caused by failure to maintain or operate the plan in a proper and efficient manner.	Yes, the relevant management measures have been incorporated within the Noise and Vibration Management Plan	SecureEnergy
	Control equipment	Section 167	Properly and efficiently maintain and operate any installed pollution control equipment (including monitoring devices).	Yes, the relevant management measures have been incorporated within the Soil and Water Management Plan.	SecureEnergy
	Littering	Part 5.6A	Do not litter in a public place or an open private place. Do not litter from a vehicle. Only deposit advertising material in receptacles provided for mail or newspapers or under the door of the premises. Do not deposit advertising material on or in vehicles.	Yes, the relevant management measures have been incorporated within the Waste Management Plan	SecureEnergy
	Waste and transportation	Section 143	Only transport waste to a facility that can lawfully accept the waste.	Section 143 Notices are to be obtained for waste that is sent to a facility/premise in accordance with the Waste Management Plan.	SecureEnergy

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EnergyConnect (NSW - Western Section) Stage 2 Construction Environmental Management Plan

Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
<i>Contaminated Land Management Act 1997</i>	Reporting contamination	Section 60	Duty to report contamination.	Yes, if project activities have caused land contamination, or a landowner becomes aware of land that is contaminated, there is a legal duty under section 60 of the <i>Contaminated Land Management Act 1997</i> to notify the EPA.	SecureEnergy
<i>Work, Health and Safety Act 2011</i> Work Health and Safety and Regulation 2011	Health and safety of workers and workplaces	All	This Act provides work health and safety regulations for the management of contaminated waste such as asbestos as well as consideration of health and safety hazards to on-site workers associated with normal construction operations.	Yes, management of contaminated waste including hazardous waste such as asbestos are detailed in the Waste Management Plan. The health and safety of on-site workers' wellbeing are detailed in the Health and Safety Management Plan (45860-HSE-PL-D-1004).	SecureEnergy
<i>Protection of the Environment Operations (Waste) Regulation 2005</i>	Waste and transportation	Part 4	Comply with record keeping requirements in relation to the transport of certain types of waste.	Yes, the relevant management measures have been incorporated within the Waste Management Plan.	SecureEnergy
<i>Dangerous Goods (Road and Rail Transport) Act 2008</i>	Hazards and risks	Section 9	Ensure that dangerous goods are transported in a safe manner.	Dangerous goods are required to be transported in a safe manner. Vehicles that transport dangerous goods are required to be licensed. Drivers transporting dangerous goods are required to be licensed. Licences to transport dangerous goods will be obtained if required.	SecureEnergy and SecureEnergy's Subcontractors
<i>Road Transport Act 2013</i>	Provisions concerning road users, road transport and the improvement of road safety	All	To consolidate most of the existing statutory provisions concerning road users, road transport and the improvement of road safety in this jurisdiction  To provide the Agreed Reforms within the meaning of the Inter-Governmental Agreement for Regulatory and Operational Reform in Road, Rail and Intermodal Transport entered into by the Commonwealth, the States and the Territories.  To facilitate recovery of expenses incurred in the administration of this Act and the collection of fees and charges payable.	All drivers are required to have a valid driver's licence. All vehicles must be registered with the applicable vehicle registration system.	SecureEnergy and SecureEnergy's Subcontractors

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Legislation/Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
			To provide for additional matters concerning the regulation of road users and road transport and the improvement of road safety in this jurisdiction.		
<i>NSW Road Rules 2014</i>	Safe and efficient movement of traffic	All	<p>To consolidate in a single instrument the road rules that are applicable in New South Wales.</p> <p>To provide for road rules that are based on the Australian Road Rules so as to ensure that the road rules applicable in this State are substantially uniform with road rules applicable elsewhere in Australia,</p> <p>To provide for other road rules to be observed in this State in relation to matters that are not otherwise dealt with in the Australian Road Rules</p>	Support the objectives of the legislation by ensuring mitigation recommendations are aligned with the Road Rules.	SecureEnergy

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## Appendix A2 – Policy for Environment, Sustainability and Community

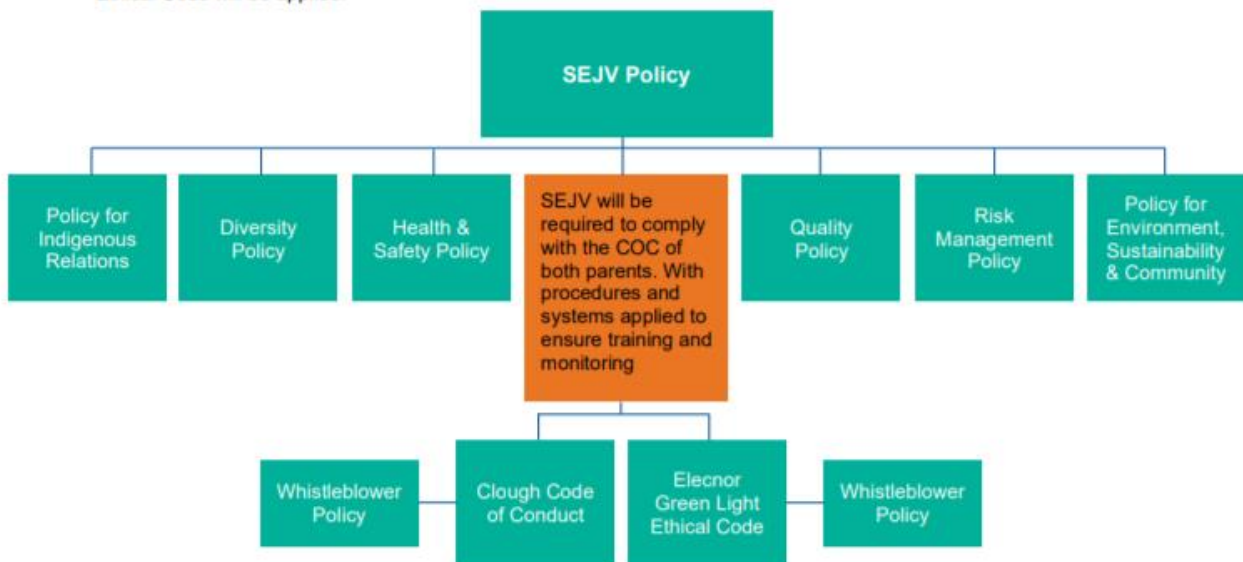
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# SecureEnergy Policy Model

SecureEnergy JV (ABN 56 282 382 697), is a joint Venture between Clough Projects Australia Pty Ltd (ABN 26 109 444 215) and Green Light Contractors Pty Ltd (ACN 168 435 658) commonly referred to as "SEJV". SEJV has been initially formed to deliver the Project Energy Connect (PEC) with a view that SEJV will become a viable delivery vehicle that will service substation and transmission network sector projects over the coming years.

It is agreed within the Joint Venture Deed that SEJV will adopt and use Clough's Management Systems (CMS). As a result, SEJV will adopt the Clough Policies that inform these systems as amended from time to time. The exception to this is Clough's Code of Conduct policy. In this instance it is proposed that both Clough's Code of Conduct and Elecnor's Ethical Code will be applied.



*John Galvin*  
**John Galvin**  
 SteerCo Member - Clough  
 SecureEnergy JV  
 Date 10/02/2021

*Carlos Fernandez*  
Carlos Fernandez (9th Dec 2021 10:34 GMT+10)  
**Carlos Fernandez**  
 SteerCo Member - Elecnor  
 SecureEnergy JV  
 Date Feb 25, 2021

*Paul Farris*  
**Paul Farris**  
 SteerCo Member - Clough  
 SecureEnergy JV  
 Date Feb 15, 2021

*Samuel Basanta*  
Samuel Basanta (9th Dec 2021 10:34 GMT+10)  
**Samuel Basanta**  
 SteerCo Member - Elecnor  
 SecureEnergy JV  
 Date Feb 16, 2021

All personal information obtained by SecureEnergy Joint Venture during the implementation of this policy will be controlled in accordance with the Clough Policy for Privacy and the Privacy Amendment (Private Sector) Act 2000.

Document No.

Rev No.



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# Policy for Environment, Sustainability & Community

Clough strives to deliver environmentally sustainable outcomes for energy, materials and water, during all stages of its operations. Clough values sustainable development and believes respect for the environment and the community in which it operates is fundamental to business success.

Clough ensures human, financial and technological resources are provided for the active management and maintenance of the Clough Management System, aligned with the requirements of AS/NZS ISO 14001 to drive continual improvement.

At Clough employees and contractors show their commitment to minimising environment and social impacts and promoting sustainable development by:

- Sharing a belief in a culture of zero harm where harm to people or the environment is unacceptable;
- Stopping work where an activity could harm the environment or community;
- Planning and performing activities to achieve zero harm outcomes; and
- Understanding their roles, responsibilities and behaviours expected of them.

Clough engages with clients, partners, stakeholders and communities to understand key environmental aspects, potential impacts and support the development of sustainable solutions.

## PRINCIPLES:

Wherever Clough operates the following principles apply to promote sustainable development, in all its operating environments:

- Making it personal – Individuals take personal responsibility to comply with relevant laws and regulations and apply responsible standards as detailed in the Clough Management System where laws do not exist.
- Make a positive impact – we enrich the lives of those in the communities in which we work and live by respecting the traditional rights of indigenous peoples and cultural heritage values.
- Accountability – Clough holds all levels in our organisation accountable for compliance with regular monitoring, reviewing and reporting on our progress against our targets that promote efficient use of resources.
- Risk Management – Clough identifies, assesses and manages risks to the environment and our host communities.
- Learning Culture – Clough maintains regular, transparent and effective communication and consultation with all employees, stakeholders and communities affected by its activities and improves the livelihoods of the communities in which we operate through local employment and training opportunities.
- We work sustainably - Design and construct to efficiently use energy and raw materials, minimise waste, reduce and prevent pollution.

The Chief Executive Officer of Clough Limited is accountable to the Board of Directors for ensuring that this Policy is implemented throughout Clough's operation

Clough undertakes to communicate this policy to all persons working for or on its behalf and to the public as required. The policy will be reviewed every three years to maintain relevance to Clough business activities.



**Peter Bennett**  
Chief Executive Officer & Managing Director  
Clough Limited  
November 2021

All personal information obtained by Clough during the implementation of this policy will be controlled in accordance with the Clough Policy for Privacy and the Privacy Amendment (Private Sector) Act 2000.

CORP-GOV-PCL-G-0014

Rev No. 2



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## Appendix A3 – Environmental Aspect and Impact Register

No.	Activity	Environmental category	Aspect/Cause	Impact/Risk	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
1	Earthworks Vegetation clearing	Heritage	Clearing outside the project footprint, plant operation and excavation outside project footprint, vibrations from plant operation and transport impacts exceed those assessed and cause structural damage to sensitive items.	Damage to heritage items, including culturally significant sites, artefacts and heritage values	<ul style="list-style-type: none"> <li>Unapproved impacts to heritage items</li> <li>Loss of items of cultural significance</li> <li>Impacts to relationships with traditional owners</li> <li>Potential regulatory action from agencies</li> <li>Project delays</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Major	Almost certain	23 - Very High	<ul style="list-style-type: none"> <li>Sensitive Area Plans (SAPs) to include heritage items</li> <li>Noise and Vibration Management Plan</li> <li>Unexpected heritage find procedure</li> <li>Physical demarcation of identified heritage locations</li> <li>Identification of additional heritage risk areas</li> <li>Additional heritage survey and heritage salvage activities.</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
2	Vegetation clearing	Biodiversity	Removal of occupied habitat, including hollow bearing trees, shrubs, nests, ground cover, rocks.	Injury/mortality of fauna	<ul style="list-style-type: none"> <li>Impacts to fauna</li> <li>Reputational impacts</li> <li>Potential regulatory action from agencies</li> </ul>	Moderate	Likely	17 - High	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Pre-clearing procedure</li> <li>Unexpected biodiversity find procedure</li> <li>Fauna handling procedure</li> <li>Use of fauna spotters/handlers</li> </ul>	Moderate	Possible	13 – Moderate	Transgrid and SecureEnergy
3	Vegetation clearing	Bushfire	Sparks from machinery ignites combustible vegetation and fire gets out of control.	Ignition of bushfire	<ul style="list-style-type: none"> <li>Significant impact to local environment through bushfire</li> <li>Potential destruction of project infrastructure and equipment</li> <li>Potential for fatality/injury to personnel and members of the public</li> <li>Damage to public property and adjacent properties</li> <li>Loss of biodiversity</li> <li>Project delays</li> <li>Significant reputational impact</li> <li>Potential regulatory actions from agencies</li> <li>Financial penalties</li> </ul>	Catastrophic	Likely	24 – Very High	<ul style="list-style-type: none"> <li>Emergency Plan</li> <li>FRACM</li> <li>Hot works permits</li> </ul>	Catastrophic	Rare	15 – Moderate	SecureEnergy
4	Earthworks Vegetation clearing	Biosecurity	Vehicular movements from disturbed and contaminated areas into undisturbed areas within the project area.	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	<ul style="list-style-type: none"> <li>Impact to biodiversity in exceedance of the approved project</li> <li>Spread of weeds/impacts to native vegetation</li> <li>Long term maintenance requirements</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Weed and seed inspections</li> <li>Hygiene inspections of vehicle prior to accessing site</li> <li>Washdown bays</li> </ul>	Moderate	Possible	13 – Moderate	Transgrid and SecureEnergy
5	Earthworks Vegetation clearing	Biodiversity	Vegetation clearing outside of project boundary, over clearing of vegetation, clearing of species unapproved for clearing.	Removal of vegetation/habitat not permitted to be impacted by the project approval	<ul style="list-style-type: none"> <li>Unapproved impact to flora</li> <li>Potential regulatory actions from agencies</li> <li>Project delays</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Major	Almost certain	23 - Very High	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Set-up exclusion zones and defined clearing limits and no-go zones</li> <li>Sensitive area plans (SAPs)</li> <li>Unexpected biodiversity find procedure</li> <li>Clearing and land disturbance permits</li> <li>Clearing register</li> </ul>	Moderate	Possible	13 – Moderate	Transgrid and SecureEnergy
6	Earthworks Vegetation clearing	Surface water	Newly exposed sediment and top soil carried into catchments and watercourses during rainfall events.	Contamination of surface water. Reduction in water quality. Dispersion of contaminants	<ul style="list-style-type: none"> <li>Water pollution</li> <li>Loss of topsoil</li> <li>Impacts to aquatic habitat and fauna</li> <li>Potential regulatory action from agencies</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Surface Water Monitoring Program</li> <li>Erosion and Sediment Control Strategy and PESCPs</li> <li>Clean water diversions</li> <li>Process and intercepted water management</li> <li>Discharge permit</li> <li>Sediment basins and water treatment</li> </ul>	Major	Unlikely	14 – Moderate	SecureEnergy

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No.	Activity	Environmental category	Aspect/Cause	Impact/Risk	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
7	Earthworks Vegetation clearing	Biodiversity	Construction activities in fauna habitats causes fauna to relocate away from area.	Fauna disturbance/relocation	<ul style="list-style-type: none"> <li>Reduction in localised population of fauna including threatened species</li> <li>Adverse fauna monitoring impacts</li> </ul>	Minor	Likely	11 - Moderate	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Sensitive area plans (SAPs) to included fauna habitats of significance</li> <li>Unexpected biodiversity find procedure</li> </ul>	Minor	Possible	10 - Moderate	Transgrid and SecureEnergy
8	Earthworks Vegetation clearing	Noise and vibration	Noise and vibration levels from construction activities and transport of materials, equipment and personnel exceeds the levels assessed in the project approval.  The project site is remote from sensitive receivers, noise and vibration impacts are more likely an issue along the access route through local towns.	Increased noise and vibration levels at sensitive receivers	<ul style="list-style-type: none"> <li>Sleep disturbance at sensitive receiver locations</li> <li>Potential regulatory action from agencies</li> <li>Loss of support from local community</li> <li>Reputational impacts</li> </ul>	Moderate	Almost certain	18 – High	<ul style="list-style-type: none"> <li>Noise and Vibration Management Plan</li> <li>Traffic and Transport Management Plan</li> <li>Out of Hours Work Procedure</li> <li>Out of Hours Work Permit</li> <li>Noise monitoring record</li> <li>Vibration monitoring record</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
9	Earthworks Vegetation clearing	Air Quality	Exposed sediment and stockpiled of fine material become airborne in strong winds and carried to other areas. Generation of dust during construction activities	Visible dust plumes and deposition of dust on surfaces, impacts to amenity, dust generation from exposing of topsoil and sub soil through vegetation removal.	<ul style="list-style-type: none"> <li>Excessive dust emission/deposition in surrounding environment</li> <li>Air quality impacts exceed the approved project levels</li> </ul>	Moderate	Almost certain	18 – High	<ul style="list-style-type: none"> <li>Air Quality Management Plan</li> <li>Implement dust-suppression through use of water cart</li> <li>Rehabilitation/stabilisation of cleared areas where possible</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
10	Earthworks Vegetation clearing	Air quality / greenhouse gas emissions	Unnecessary operation/idling of vehicles, machinery and plant.	Excess use of natural resources and energy leading to production of greenhouse gases.	<ul style="list-style-type: none"> <li>Excessive consumption of diesel and other resources</li> <li>Unnecessary production of greenhouse gases</li> </ul>	Minor	Possible	10 - Moderate	<ul style="list-style-type: none"> <li>Training/instruction to on-site staff, machinery and plant operators to shut down vehicles and equipment when not in use</li> </ul>	Minor	Rare	5 – Low	SecureEnergy
11	Vegetation clearing	Waste	Mismanagement of waste vegetation	Vegetation disposed of unlawfully	<ul style="list-style-type: none"> <li>Potential regulatory action from agencies</li> </ul>	Moderate	Possible	13 - Moderate	<ul style="list-style-type: none"> <li>Waste Management Plan</li> </ul>	Minor	Unlikely	6 – Low	SecureEnergy
12	Earthworks	Biodiversity	Improper stockpiling of excavated material and engineered fill.	Impacts on vegetation/habitat beyond the project boundary.	<ul style="list-style-type: none"> <li>Unapproved impacts beyond project boundary</li> <li>Potential regulatory action from agencies</li> <li>Project delays</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Utilisation of allocated stockpile areas</li> <li>Stockpiling procedure</li> <li>Training for all contractors</li> </ul>	Moderate	Rare	7 - Low	Transgrid and SecureEnergy



No.	Activity	Environmental category	Aspect/Cause	Impact/Risk	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
13	Earthworks	Landform	Exposed sediment carried into catchments and watercourses during rainfall events due to lack of controls or inadequately installed controls.	Loss and/or degradation of topsoils and subsoils.	<ul style="list-style-type: none"> <li>Adverse water quality impacts</li> <li>Loss of amenity</li> <li>Potential regulatory action from agencies</li> <li>Reputational impacts</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Water Quality Monitoring Program</li> <li>Erosion and Sediment Control Strategy and PESCPs</li> <li>Clean water diversions</li> <li>Process and intercepted water management</li> <li>Sediment basins and water treatment (as required)</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
14	Transport of materials, equipment and personnel	Biodiversity	Driving vehicles on access roads during times of high fauna activity. Excessive speed on access roads. Inattention of drivers on potential for fauna impacts.	Frequent injury/mortality of protected fauna	<ul style="list-style-type: none"> <li>Trigger EPBC Act thresholds for impacts on commonwealth listed species,</li> <li>Potential regulatory action from agencies</li> <li>Financial penalties</li> <li>Reputational impacts</li> <li>Personal injury due to collision with larger fauna including kangaroos and horses.</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Traffic and Transport Management Plan</li> </ul>	Moderate	Possible	13 – Moderate	Transgrid and SecureEnergy
15	Transport of materials, equipment and personnel	Biosecurity	Vehicular movements from disturbed and contaminated areas into undisturbed areas within the project area.	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	<ul style="list-style-type: none"> <li>Impact to biodiversity in exceedance of the approved project</li> <li>Spread of weeds/impacts to native vegetation</li> <li>Long term maintenance requirements</li> <li>Potential regulatory action from agencies</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Site inductions</li> <li>Weed and seed inspections</li> <li>Hygiene inspections of vehicle prior to accessing site</li> </ul>	Major	Unlikely	14 – Moderate	Transgrid and SecureEnergy
16	Transport of materials, equipment and personnel	Surface water	Vehicular spills along access road or within Project compounds.	Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	<ul style="list-style-type: none"> <li>Hydrocarbon pollution</li> <li>Potential regulatory action from agencies</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Spill Response Procedure</li> </ul>	Moderate	Unlikely	12 – Moderate	SecureEnergy
17	Transport of materials, equipment and personnel	Air Quality	Transportation vehicles movements cause dust particle to become airborne and carried in wind to other areas.	Visible dust plumes and deposition of dust on surfaces.	<ul style="list-style-type: none"> <li>Excessive dust emission/deposition in surrounding environment</li> <li>Air quality impacts exceed the approved project levels</li> <li>Adverse biodiversity impacts</li> <li>Reputational impacts</li> </ul>	Moderate	Possible	13 - Moderate	<ul style="list-style-type: none"> <li>Air Quality Management Plan</li> <li>Implement dust-suppression through use of water cart</li> <li>Cover all loads during transportation</li> </ul>	Moderate	Unlikely	12 – Moderate	SecureEnergy
18	Transport of materials, equipment and personnel	Waste	Materials shipped from distant locations, excessive personal vehicle usage, repeated movements back and forth from site.	Excess use of natural resources and energy.	<ul style="list-style-type: none"> <li>Unnecessary production of greenhouse gases</li> <li>Impacts of the project exceed those assessed in the EIS</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Traffic and Transport Management Plan</li> </ul>	Moderate	Unlikely	12 – Moderate	SecureEnergy
19	Transport of materials, equipment and personnel	Traffic and Transport	Increased traffic volumes and congestion, increased road noise, degradation of roadways, traffic delays. Heavy and light vehicles moving in convoys through local towns to the project site.	Roadworks on local roads blocking or excessively delaying traffic movements and thoroughfare.	<ul style="list-style-type: none"> <li>Traffic delays on local and regional roads</li> <li>Increased road safety hazard</li> <li>Adverse reputational impacts</li> <li>Increased noise and air quality impacts</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Traffic and Transport Management Plan</li> <li>Traffic Control Plans</li> <li>Engagement with community to manage expectations</li> <li>Community Communication Strategy</li> <li>Manage timing of oversize/overmass (OSOM) movements in accordance with TfNSW requirements</li> </ul>	Minor	Unlikely	6 – Low	SecureEnergy

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No.	Activity	Environmental category	Aspect/Cause	Impact/Risk	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
20	Stockpile/spoil emplacement	Biodiversity	Disturbance of natural areas and storage of spoil provides opportunity for weeds to establish and spread beyond the project area.	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	<ul style="list-style-type: none"> <li>Impact to biodiversity in exceedance of the approved project</li> <li>Spread of weeds/impacts to native vegetation</li> <li>Long term maintenance requirements</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Biodiversity Management Plan</li> <li>Training for all contractors</li> </ul>	Major	Unlikely	14 – Moderate	Transgrid and SecureEnergy
21	Stockpile/spoil emplacement	Surface Water	Runoff from spoil stockpiles causes contaminated/polluted stormwater discharge into watercourses due to lack of controls or inadequately installed controls.	Erosion and sedimentation. Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	<ul style="list-style-type: none"> <li>Adverse water quality impacts</li> <li>Loss of amenity</li> <li>Potential regulatory action from agencies</li> <li>Reputational impacts</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Erosion and Sediment Control Strategy and PESCPs</li> </ul>	Major	Unlikely	14 – Moderate	SecureEnergy
22	Storage of hazardous materials	Surface water	Spill of stored hazardous material escaping containment into waterways.	Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	<ul style="list-style-type: none"> <li>Hydrocarbon pollution</li> <li>Potential regulatory action from agencies</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Bunded areas for storage of fuels and oils</li> </ul>	Major	Unlikely	14 – Moderate	SecureEnergy
23	Storage of hazardous materials	Groundwater	Spill or leaks of stored hazardous material dispersing into ground water.	Contamination of groundwater.	<ul style="list-style-type: none"> <li>Potential for irreparable damage to groundwater quality</li> <li>Long term impacts to groundwater dependent species or ecosystems</li> </ul>	Major	Unlikely	14 – Moderate	<ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Bunded areas for storage of fuels and oils</li> </ul>	Moderate	Rare	7 - Low	SecureEnergy
24	Rock crushing/screening	Noise and vibration	Rock crushing and screening activities situated too close to sensitive receivers.	Increased noise and vibration levels at sensitive receivers.	<ul style="list-style-type: none"> <li>Sleep disturbance at sensitive receiver locations</li> <li>Loss of support from local community</li> </ul>	Moderate	Unlikely	12 – Moderate	<ul style="list-style-type: none"> <li>Noise and Vibration Management Plan</li> <li>Management of operational hours and intensity level</li> </ul>	Moderate	Rare	7 - Low	SecureEnergy
25	Rock crushing/screening	Air Quality	Rock crushing and screening activities not implementing adequate dust suppression mitigation.	Increased dust emissions.	<ul style="list-style-type: none"> <li>Excessive dust emission/deposition in surrounding environment air quality impacts exceed the approved project levels adverse biodiversity impacts</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Air Quality Management Plan</li> <li>Weather monitoring prior to operation</li> <li>Use of covers and water spray</li> </ul>	Minor	Unlikely	6 – Low	SecureEnergy
26	Construction of transmission line tower/poles	Noise vibration and	Increase use of heavy plant and equipment	Increased noise and vibration levels at sensitive receivers.	<ul style="list-style-type: none"> <li>Potential regulatory actions from agencies</li> <li>Reputational impacts</li> <li>Loss of support from local community</li> </ul>	Moderate	Likely	17 - High	<ul style="list-style-type: none"> <li>Noise and Vibration Management Plan</li> <li>Management of operational hours and intensity level</li> <li>Community Communication Strategy</li> <li>Engagement with community to manage expectations</li> <li>Complaints Management System</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
27	Construction of transmission line tower/poles foundation	Water	Unapproved extraction of water quantity, water use or from unapproved water supply points	Impacts to the existing groundwater quantity for nearby local and downstream users, impacts to nearby groundwater dependent ecosystems.	<ul style="list-style-type: none"> <li>Unlawful extraction of water</li> <li>Potential regulatory actions from agencies</li> <li>Reputational impacts</li> <li>Loss of support from local community</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Soil and Water Management Plans</li> <li>Water extraction logs</li> <li>Water meter</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
28	Assembly of transmission line towers/poles	Noise vibration and	Increase use of heavy plant and equipment	Increased noise and vibration levels at sensitive receivers.	<ul style="list-style-type: none"> <li>Reputational impacts</li> <li>Loss of support from local community</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Noise and Vibration Management Plan</li> <li>Engagement with community to manage expectations</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy

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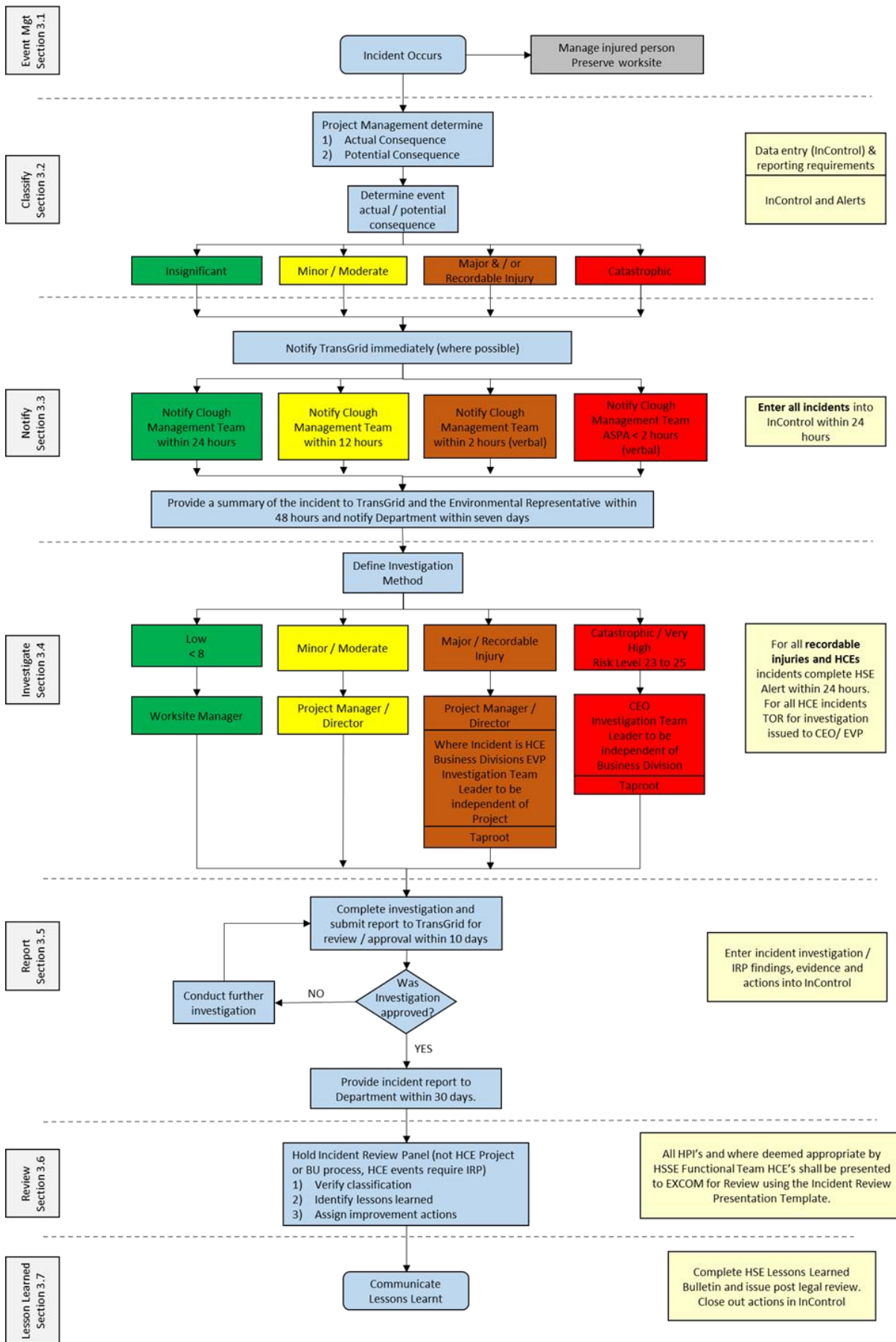
No.	Activity	Environmental category	Aspect/Cause	Impact/Risk	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
29	Assembly of transmission line towers/poles	Socio economic	Visual deterioration of the skyline reducing its aesthetic appeal	Disturbance in the landscape	<ul style="list-style-type: none"> <li>Reputational impacts</li> <li>Loss of support from local community</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Community Communication Strategy</li> <li>Engagement with community to manage expectations</li> <li>Complaints management system</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
30	Decommissioning of existing transmission line tower/poles	Noise vibration and	Increase use of heavy plant and equipment	Increased noise and vibration levels at sensitive receivers.	<ul style="list-style-type: none"> <li>Potential regulatory actions from agencies</li> <li>Reputational impacts</li> <li>Loss of support from local community</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Noise and Vibration Management Plan</li> <li>Management of operational hours and intensity level</li> <li>Community Communication Strategy</li> <li>Engagement with community to manage expectations</li> <li>Complaints Management System</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy
31	Decommissioning of existing transmission line tower/poles	Contamination	Decommissioning of existing transmission tower with asbestos containing paint	Human health risk and reduction of local air quality	<ul style="list-style-type: none"> <li>Potential for fatality/injury to personnel and members of the public</li> <li>Potential regulatory actions from agencies</li> <li>Environmental contamination</li> </ul>	Major	Likely	19 – High	<ul style="list-style-type: none"> <li>Safe Work Method Statement</li> <li>Use of hygienist where require</li> </ul>	Moderate	Unlikely	12 - Moderate	SecureEnergy
32	Storage/ disposal of hazardous materials	Waste	Inadequate storage of hazardous materials, inadequate spill management practices, improper disposal practices.	Contamination of soil and water, unlawful disposal of waste.	<ul style="list-style-type: none"> <li>Contamination of soil and water in sensitive environment</li> <li>Potential regulatory action from agencies</li> <li>Financial penalties</li> <li>Loss of community support</li> <li>Reputational impacts</li> </ul>	Major	Possible	19 – High	<ul style="list-style-type: none"> <li>Waste Management Plan</li> <li>Use of licensed disposal contractors</li> <li>Appropriate bunded storage of hazardous materials</li> </ul>	Major	Unlikely	14 – Moderate	SecureEnergy
33	Operation of construction compound	Water and electricity	Inefficient use of resources within the accommodation camp.	Excess use of natural resources and energy.	<ul style="list-style-type: none"> <li>Excessive use of resources such as water and electricity</li> </ul>	Minor	Likely	11 - Moderate	<ul style="list-style-type: none"> <li>Energy efficient design of site facilities</li> </ul>	Minor	Unlikely	6 – Low	SecureEnergy
34	Operation of construction compound	Waste	Inadequate management of camp waste including sewerage and mixed waste.	Odour impacts, contamination of soil and water in sensitive environment, excess waste sent to landfill.	<ul style="list-style-type: none"> <li>Unlawful disposal of waste excess waste generation</li> <li>Contamination of waste streams</li> <li>Contamination of soil and water</li> <li>Potential regulatory action from agencies</li> </ul>	Moderate	Possible	13 - Moderate	<ul style="list-style-type: none"> <li>Waste Management Plan</li> <li>Use of licensed waste disposal contractors</li> <li>Waste tracking and register of waste disposal</li> </ul>	Major	Unlikely	14 – Moderate	SecureEnergy
35	Operation of construction compound	Surface water	Leak from the wastewater treatment plant into the receiving environment	Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	<ul style="list-style-type: none"> <li>Environmental contamination</li> <li>Potential regulatory action from agencies</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Moderate	Likely	17 – High	<ul style="list-style-type: none"> <li>Soil and Water Management Plan</li> <li>Wastewater treatment plant to be self-bunded</li> </ul>	Minor	Unlikely	6 – Low	SecureEnergy
36	Use of treated wastewater	Contamination	Use of treated wastewater that does not meet the applicable water quality requirements.	Contamination of soil and water. Human and environmental health risk	<ul style="list-style-type: none"> <li>Environmental contamination</li> <li>Potential regulatory action from agencies</li> <li>Financial penalties</li> <li>Reputational impacts</li> </ul>	Major	Likely	19 – High	<ul style="list-style-type: none"> <li>Accommodation Camp Management Plan</li> <li>Wastewater treatment plant maintenance manual</li> <li>Verification monitoring program</li> </ul>	Moderate	Possible	13 – Moderate	SecureEnergy

No.	Activity	Environmental category	Aspect/Cause	Impact/Risk	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
37	Hot works and plant operations	Bushfire	Sparks from machinery or hot work activities ignites combustible vegetation and fire gets out of control.	Ignition of bushfire.	<ul style="list-style-type: none"> <li>Significant impact to local environment through bushfire</li> <li>Potential destruction of project infrastructure and equipment</li> <li>Potential for fatality/injury to personnel and members of the public</li> <li>Damage to public property and adjacent properties</li> <li>Loss of biodiversity</li> <li>Project delays</li> <li>Significant reputational impact</li> <li>Potential regulatory actions from agencies</li> <li>Financial penalties</li> </ul>	Catastrophic	Likely	24 – Very High	<ul style="list-style-type: none"> <li>Emergency Plan</li> <li>FRACM</li> <li>Hot works permits</li> </ul>	Catastrophic	Rare	15 – Moderate	SecureEnergy
38	Inflow of workforce to local area	Socio economic	Workforce size relocating to local area.	Business impacts, increased housing demand.	<ul style="list-style-type: none"> <li>Housing rental/purchase prices increase due to increased demand</li> <li>Local services struggle to meet demands</li> <li>Loss of community support for the project</li> </ul>	Minor	Possible	10 - Moderate	<ul style="list-style-type: none"> <li>Establishment of construction camps to provide accommodation for workforce</li> <li>Encourage personnel to purchase local produce and use local business to stimulate positive economic growth in the locality</li> </ul>	Minor	Unlikely	6 – Low	SecureEnergy
39	Working in bushfire prone areas	Bushfire	Siting of temporary infrastructure and personnel in bushfire prone areas without appropriate bushfire mitigation in place.	Ignition of bushfire.	<ul style="list-style-type: none"> <li>Damage to construction site, works and accommodation camps</li> <li>Project delays</li> <li>Safety impacts</li> </ul>	Moderate	Possible	13 - Moderate	<ul style="list-style-type: none"> <li>Preposition firefighting equipment</li> <li>Safety and emergency systems and procedures</li> <li>Implement preparatory actions of Emergency plan</li> </ul>	Minor	Unlikely	6 – Low	SecureEnergy
40	Working in UXO prone areas	Socio economic	Unidentified/buried unexploded ordnance	Working in unexploded ordnance prone area	<ul style="list-style-type: none"> <li>Project delays</li> <li>Safety impacts</li> </ul>	Catastrophic	Likely	24 – Very High	<ul style="list-style-type: none"> <li>Physical demarcation of identified UXO prone areas</li> <li>Unexpected Contamination Find Procedure</li> </ul>	Catastrophic	Rare	15 – Moderate	SecureEnergy



## Appendix A4 – Incident, Notification and Investigation Procedure Flowchart

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## Appendix A5 – Management measures for unassigned conditions of the Infrastructure Approval and RMMs

ID	Management measures	When to implement	Responsibility	Reference
<b>Miscellaneous</b>				
MM1	Permanent engineering batters and water management measures will be designed to integrate with the existing landforms and natural features. Design reports will consider integration of the permanent engineering batters and water management measures (ie drainage) with the existing landforms and natural features.	Detailed design	Design Manager	RMM LV3
MM2	Lighting at construction compound and accommodation camps will be designed: <ul style="list-style-type: none"> <li>to minimise off-site lighting impacts to sensitive receivers;</li> <li>include the use of low intensity lighting where practicable, except where required for safety or emergency purposes;</li> <li>generally does not emit light above the horizon, except where required for safety or emergency purposes; and</li> <li>generally in accordance with <i>AS4282-2019 Control of the obtrusive effects of outdoor lighting</i>.</li> </ul>	Detailed design	Supervisor	RMM LV4 Condition D41
MM3	The following aspects will be considered in design reports during the detailed design of the transmission line structures, where possible: <ul style="list-style-type: none"> <li>distance from private residences;</li> <li>use of local vegetation and landform as screening to residences or from the road;</li> <li>reduce the potential visual impact where the proposal alignment is visible for a long duration, and in open landscapes;</li> <li>to be positioned alongside existing transmission line structures where feasible;</li> <li>the location of transmission line structures in relation to locally prominent landforms; and</li> <li>clearing requirements along creek lines.</li> </ul>	Detailed design	Design Manager	RMM LV5
MM4	Visual impacts from transmission line structures, where transmission line crosses a roadway, will be considered during detailed design phase where feasible and reasonable.	Detailed design	Design Manager	RMM LV6
MM5	Opportunities for screening vegetation for affected private property landholders will be investigated to determine the extent of the impact and appropriateness of the screening vegetation to reduce the visual impact from the residence. This will be undertaken in negotiation with the affected resident. Where required, screening vegetation will be planted prior to completion of construction and will be maintained by the landholder.	Construction	Design Manager and Transgrid	RMM LV8
MM6	The project will be designed in accordance with <i>Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz – 100 kHz) (International Commission on Non-Ionizing Radiation Protection</i> and the EMF guidelines of set out in Table 19-2 of the EIS where practicable and feasible, otherwise in line with Transgrid's Transmission Line Design Manual – Major New Build.	Detailed design	Design Manager	RMM HR1 Condition D45
MM7	The storage, handling, and transport of dangerous goods will be undertaken in accordance with: <ul style="list-style-type: none"> <li>the relevant Australian Standards and guidelines, particularly: <ul style="list-style-type: none"> <li>AS1940 <i>The storage and handling of flammable and combustible liquids</i>;</li> </ul> </li> </ul>	Construction	Supervisor, Environmental Manager, HSSE	Condition D44

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ID	Management measures	When to implement	Responsibility	Reference
	<ul style="list-style-type: none"> <li>- AS/NZS 1596:2014 <i>The storage and handling of LP Gas, the Dangerous Goods Code</i>; and</li> <li>- the EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Manual</i>.</li> </ul>			
MM8	<p>Works to public infrastructure will be undertaken, in consultation with the applicable public authority or service provider, in the following events:</p> <ul style="list-style-type: none"> <li>• where any public infrastructure that is damaged by the project; and</li> <li>• where any public infrastructure needs to be relocated as a result of the project.</li> </ul> <p>Public infrastructure works does not include any damage to roads caused from general road usage.</p>	Construction	Supervisor	Condition A8
MM9	<p>The Proponent will ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, to the relevant Australian Standard.</p>	Construction	Supervisor	Condition A10
MM10	<p>Advertisement signs, logos and other off-site visual materials related to the project will be avoided or minimised to reduce visual impacts, where reasonable and practicable, except where required for site identification, or traffic and haulage purposes, or safety purposes.</p>	Construction	Supervisor, Environmental Manager	Condition D42

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## Appendix B – Environmental Management Sub-Plans