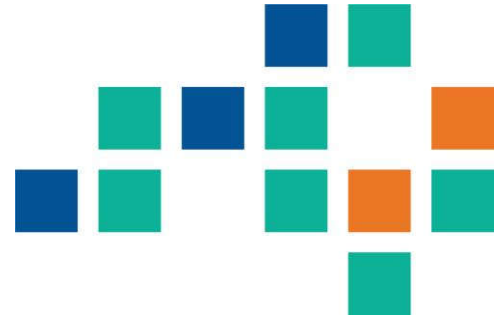

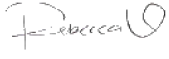





INTERNAL



Construction Environmental Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 45860-HSE-PL-D-0108

| REV | DATE | GENERAL DESCRIPTION | PREPARED | REVIEWED | VERIFIED | VERIFIED | APPROVED |
|-----|------------|------------------------------|---|---|--|--|--|
| A | 26/05/2022 | Internal review | M. Lee | R. Walker-Edwards | A. Boyd | JL. Barrenechea | D. Whatmough |
| B | 7/06/2022 | Issue for Transgrid's review | M. Lee | R. Walker-Edwards | A. Boyd | JL. Barrenechea | D. Whatmough |
| C | 14/09/2022 | Issue for Transgrid's review | M. Lee | R. Walker-Edwards | A. Boyd | B.Calligeros | S.Basanta |
| 0 | 30/09/2022 | Issue for ER endorsement |  M. Lee |  R. Walker-Edwards |  A. Boyd <small>Alistair Boyd (Sep 30, 2022 12:21 GMT+10)</small> |  B.Calligeros <small>Vassily Calligeros (Sep 30, 2022 14:42 GMT+10)</small> |  S.Basanta |

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Abbreviations

| Acronym | Definition |
|---|---|
| Amendment Report | <i>Amendment Report EnergyConnect (NSW – Eastern Section)</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 |
| DCCEEW | Department of Climate Change, Energy, the Environment and Water |
| DPE or Department | Department of Planning and Environment |
| DPIE | Department of Planning, Industry and Environment, now as Department of Planning and Environment |
| EECs | Endangered ecological communities |
| EIA | Environmental Impact Assessment |
| EIS | <i>Environmental Impact Statement EnergyConnect (NSW – Eastern Section)</i> |
| EMS | Environmental Management System |
| EP&A Act | <i>Environmental Planning and Assessment Act 1979</i> |
| EPA | NSW 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 - Eastern Section) |
| Response to DPE Request for Information | EnergyConnect (NSW – Eastern Section) Response to Department of Planning and Environment Request for Information (30 August 2022) |
| RMMs | Revised management measures |
| ROs | Road occupancy licences |
| SA | South Australia |

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| Acronym | Definition |
|--------------------|--|
| 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. |
| SHA | Site hazard analysis |
| SSI | State significant infrastructure |
| Submissions Report | <i>Submissions Report EnergyConnect (NSW – Eastern Section)</i> |
| 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 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 (the project).

A referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was submitted on 25 August 2020. The Australian Department of Agriculture, Water and the Environment (DAWE) determined the project to be a controlled action on 30 September 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 *Environmental Impact Statement EnergyConnect (NSW – Eastern Section)* (EIS) was prepared for the project in January 2022 and was placed on public exhibition from 19 January 2022 to 15 February 2022. A total of 75 submissions were received, with five from special interest groups and nine from local councils and 44 from the public. In addition, 17 government agencies also provided advice during this time.

The *Submissions Report EnergyConnect (NSW – Eastern Section)* (Submissions Report) was prepared for the project in response to the submissions received during the public exhibition of the EIS and includes the final set of revised mitigation measures (RMMs) that are to be applied. The Submissions Report was finalised in May 2022. Transgrid also prepared a separate *Amendment Report EnergyConnect (NSW – Eastern Section)* (Amendment Report) to document design changes and additional environmental assessment undertaken since exhibition of the EIS. The Amendment Report was also finalised in May 2022.

On 2 June 2022, the Department requested additional information (Project EnergyConnect (NSW - Eastern Section) (SSI-9172452) Request for Additional Information (June 2022)) to assist with the assessment of the project. In response TransGrid prepared and provided the EnergyConnect (NSW – Eastern Section) Response to Department of Planning and Environment Request for Information

(Response to DPIE Request for Information) to address the requests for information raised by the Department. The Response to DPIE Request for Information was dated 30 August 2022.

Approval for the project under the EP&A Act was granted by the NSW Minister for Planning (Infrastructure Approval SSI-9172452). Approval of the project will lapse if the project has not physically commenced 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 sub-plans have been prepared to describe the environmental management practices and procedures to be implemented for the construction of Stage 1 of EnergyConnect (NSW – Eastern Section) (the project). Section 2.3 outlines the scope of works included in Stage 1 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 primarily address the requirements of conditions B1, B2 and D1 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 B1 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.

1.6 CEMP 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 | Relevant Council | DPE Water | BCS | Heritage NSW | Heritage Council | Aboriginal Stakeholders | NPWS | TFNSW |
|---|------------------|-----------|-----|--------------|------------------|-------------------------|------|-------|
| Noise and Vibration | - | - | - | - | - | - | - | - |

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| CEMP Sub-plan required under condition B2 | Relevant Council | DPE Water | BCS | Heritage NSW | Heritage Council | Aboriginal Stakeholders | NPWS | TFNSW |
|---|------------------|-----------|-----|--------------|------------------|-------------------------|------|-------|
| Out of Hours Work Protocol ¹ | C | | | | | | | |
| Soil and Water | C | C | - | - | - | - | - | - |
| Biodiversity | - | - | C | - | - | - | - | - |
| Heritage | - | - | - | C | C | C | C | - |
| Traffic and Transport | C | - | - | - | - | - | - | C |

¹ the Out of Hours Work Protocol forms part of the Noise and Vibration Management Plan as required under condition C10 of the Infrastructure Approval.

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

1.7 Submission and approval

In accordance with condition B1 of the Infrastructure Approval, the CEMP and CEMP sub-plans listed under condition B1 must be submitted and approved by the Secretary of Department of Planning 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.

Construction will not commence until the CEMP and CEMP sub-plans required under condition B1, or where staging is proposed the plans required for that stage, have been approved by the Planning Secretary.

This CEMP will be implemented for the duration of construction of Stage 1 of the project.

Transgrid and/or SecureEnergy will comply with the requirements that arise from the Department’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.transgrid.com.au/projects-innovation/energyconnect>.

Registered copies will be distributed to the following:

- Project Director;
- Deputy Project Director;
- Project Operations Director;
- Project HSSE Manager;
- Environmental Manager;

- Transgrid 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 1.7.

1.10 Updating the CEMP

In accordance with condition D2 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 D6 of the Infrastructure Approval;
- submission of an audit report under condition D11 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 the Department (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 prior to re-issue.

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 (ER) will consider and 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 submitted to the ER for endorsement prior to being submitted to DPE for review and approval.

As permitted by condition A8, 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 the Department 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 electricity facility at Red Cliffs;
- NSW sections including:
 - Western section 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 (the subject area of this CEMP), which extends from Buronga to Wagga Wagga; and
- SA section, which extends from Robertson to the SA/NSW border.

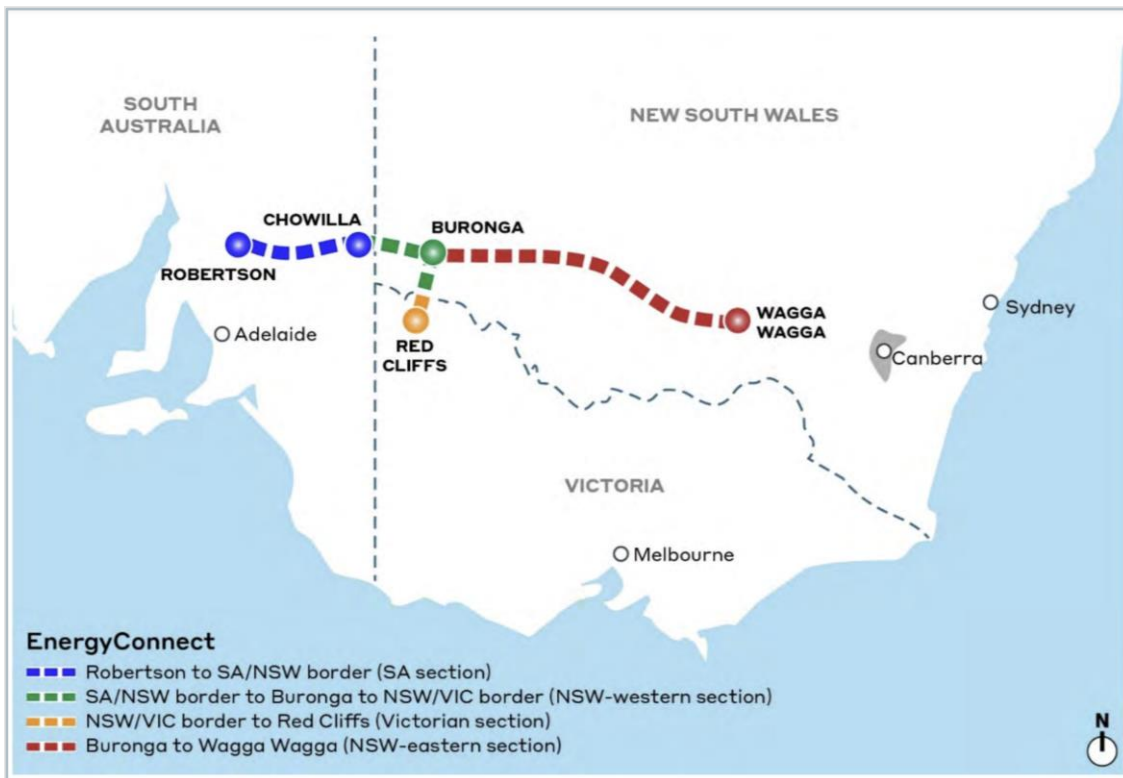


Figure 2.1 - Overview of EnergyConnect (WSP)

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2.2 EnergyConnect (NSW – Eastern Section)

The key components of the proposed works for EnergyConnect (NSW - Eastern Section) will involve construction of transmission lines from Buronga to Wagga Wagga, a distance of approximately 540 kilometres, construction of a new substation, Dinawan substation, located south of Coleambally and the upgrade and expansion of the existing Wagga Wagga substation. Refer to Figure 2.2. EnergyConnect (NSW - Eastern Section) will traverse across the following local government areas: Wentworth, Balranald, Murray River, Edward River, Hay, Murrumbidgee, Federation, Lockhart and Wagga Wagga.

2.3 Staging

Condition A8 allows 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 particular requirements of conditions of approval that are not applicable to the particular stage. The project is to be staged in accordance with condition A8.

This CEMP has been prepared specifically for EnergyConnect (NSW – Eastern Section) Stage 1 of construction and will be implemented for the duration of Stage 1 of construction.

Stage 1 of construction is proposed to occur ahead of the main transmission line works in order to expedite the overall delivery program for EnergyConnect. Transgrid will notify the Department in writing via the Major Projects website portal of the commencement date of Stage 1.

The key project components of Stage 1 of construction include, but are not limited to, the activities provided in Table 2.1.

Table 2.1 - Key project components of Stage 1 of construction

| Key activity | Description of key activity |
|---|---|
| Environmental investigations, including biodiversity and heritage protection, salvage and recordings | These 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. The definition of 'construction' within the Infrastructure Approval excludes these pre-construction minor works (defined separately within the Infrastructure Approval), road upgrades and operation of the accommodation camps. These activities will therefore not be subject to the Stage 1 CEMP and CEMP sub-plans. |
| Other survey work, such as road dilapidation surveys, and surveys of the general alignment and existing utilities | |
| Bulk earthworks at Wagga Wagga substation upgrade and expansion site and at Dinawan substation site | <p>Bulk earthworks to form the Dinawan substation pad including placement of approximately 200,000 cubic metres of material to allow for the construction of the substation pad.</p> <p>Earthworks are also required at the Wagga Wagga substation upgrade and expansion site. Contaminated material within the existing building and nearby areas will be removal from site, where required.</p> <p>Crushing and screening activities may be required to meet the engineering and volume requirements on both sites. Existing soil that does not meet engineering requirements for the substation pad will be segregated and placed as temporary stockpiled material for removal from site.</p> <p>Bulk earthworks for both sites will continue along with excavation and preparation of the site for concrete foundations, footings, pads and general site drainage works</p> |
| Site establishment and construction works at Wagga Wagga substation upgrade. | <p>The existing Wagga Wagga substation will be upgraded and expanded to accommodate the new transmission lines, transformer bays, including relocating existing bays and associated electrical and civil works. The main site establishment activities and construction works to be undertaken at Wagga Wagga substation upgrade and expansion site includes:</p> <ul style="list-style-type: none"> clearing of vegetation within the disturbance area (including scrub, undergrowth and ground vegetation); localised earthworks and associated civil works within the existing substation site and where required, replacement of topsoils; |

| Key activity | Description of key activity |
|---|---|
| | <ul style="list-style-type: none"> • establishing crushing and screening plants (if required), ancillary facilities, including but not limited to offices and amenities, and internal pavements/roads; • installation of construction environmental management measures, where required, including general site drainage works, erosion and sediment controls; • demolition of the existing transformer storage, oil storage and equipment sheds to accommodate the double circuit configuration. Works would be required to clear the concrete base, bunds and other utilities (oil and water pipes which would require relocation); • installation of reinforced concrete and piled foundations for the specialised electrical equipment; • removal and where appropriate re-use of existing electrical equipment (as required based on detailed connection requirements) and final design agreement with Transgrid; • installing temporary and permanent fencing (including perimeter security fencing around the site where required), signage and security measures; and • new electrical line bays constructed to the west of the existing infrastructure and associated civil works which will require new foundations and cable trench extension; • extension of the existing switchyard and installation of electrical equipment such as cables, conduits, earth grid and trenches; • relocation of existing and proposed new circuit for incoming transmission lines; • relocation, modification and replacement of existing utility infrastructure within the Wagga Wagga substation site including existing capacitor banks and associated equipment, line disconnectors/ earthing switches, surge arresters and capacitor voltage transformers; and • adjustment of existing and/or installation new stormwater drainage system. |
| <p>Site establishment and construction works at Dinawan substation site</p> | <p>A new substation will be constructed halfway between Coleambally and Jerilderie. The new substation is referred to as Dinawan substation, will be located approximately 500 to 700m east of Kidman Way and will be accessed via a newly constructed access road. The infrastructure and equipment that will be installed at Dinawan substation includes:</p> <ul style="list-style-type: none"> • two line bays installed at the western end of the substation to provide a connection to the Buronga substation and two line bays installed at the eastern end of the substation to provide a connection to the Wagga Wagga substation; and • installation of a range supporting electrical components including capacitor banks, synchronous condensers, transformers, shunt reactors, overhead conductors, busbars, gantries and circuit breaker switchgear equipment. <p>The main site establishment activities and construction works to be undertaken at the Dinawan substation includes:</p> <ul style="list-style-type: none"> • clearing of vegetation within the disturbance area (including scrub, undergrowth and ground vegetation); • localised earthworks and associated civil works within the new substation site and where required, replacement of topsoils; • establishing crushing and screening plants (if required), ancillary facilities, including but not limited to offices and amenities, and internal pavements / roads; • installation of reinforced concrete and piled foundations for specialised electrical equipment for the new substation buildings; • construction of secondary system control buildings to accommodate protection for new switchgear and fixed portions of secondary system; • installation of control and protection systems including relays, metering, disturbance recorder, etc; • installation of electrical distribution system; • construction of oil containment system (including bunding and containment tank); • installation of lighting and lighting mast(s); • installation of security fencing and security system (such as security cameras and asset protection zones); • adjustment of existing and/or construction of new stormwater drainage system; and • installation of associated communications network infrastructure. |

| Key activity | Description of key activity |
|---|--|
| Site establishment of accommodation camp | <p>Stage 1 of the project will require the establishment and operation of the following accommodation camps, construction compounds and laydown areas:</p> <ul style="list-style-type: none"> • construction compound at Wagga Wagga; • accommodation camp and construction compound at Lockhart; • accommodation camp and construction compound at Dinawan; • accommodation camp and construction compound at Cobb Highway; • construction compound at Balranald; and • continued use of the construction compound at Buronga. <p>The main activities that would be undertaken at each construction compound and accommodation camp includes:</p> <ul style="list-style-type: none"> • bulk earthworks including clearing of vegetation within the disturbance area (including scrub, undergrowth and ground vegetation); • clearing and removal and where required, replacement of topsoils, and general site drainage works; |
| Site establishment and operation of the construction compound and laydown | <ul style="list-style-type: none"> • for the accommodation camp, establishing the accommodation and associated facilities, including but not limited to site offices, amenities, wastewater treatment plant, power generators, hazardous material and fuel storage area and internal roads; • for the construction compound, establishing and operating site offices, crushing and screening plants (if required), laydown areas, other ancillary facilities, including but not limited to and amenities, and internal roads; • connections and pre-commissioning of on-site utilities (wastewater treatment plant, connection to mains power grid and etc.) for the construction compound and accommodation camps; and • installing temporary fencing, signage and security measures as well as any necessary construction environmental management measures such as erosion and sediment controls, where required. <p>The definition of 'construction' within the Infrastructure Approval excludes the operation of the accommodation camps. The operation of the accommodation camp is addressed in their respective Accommodation Camp Management Plan required under condition C50. Therefore the operation of the accommodation camps will not be subject to the Stage 1 CEMP and CEMP sub-plans. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval.</p> |
| Traffic haulage routes and access points | <p>The construction vehicle movements will be required for a variety of activities (i.e. earthworks, clearing and grubbing activities). All construction vehicles associated with the development will travel via the haulage routes as identified in Appendix 3 of the Infrastructure Approval or as otherwise approved.</p> <p>The establishment of access points would include establishing vehicle access and egress points to ensure safe vehicle movements. Existing access points may also be used.</p> <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 C35.</p> |
| Water supply points – establishment and/or use | <p>A number of water supply points have been identified along the length of the project to support construction water needs for the project. The proposed water supply points which are to be established and / or used include:</p> <ul style="list-style-type: none"> • Church Street, Balranald Shire Council; • 111 Jerilderie Street, Murrumbidgee Council; • Dinawan S&D, Murrumbidgee Council; • Bulgary (Rohan Road), Lockhart Shire Council; • Lockhart (Lockhart - the Rock Road), Lockhart Shire Council; • Lake Albert (Plumpton Road), Wagga Wagga City Council; • Ashfords Road, Wagga Wagga City Council; • Ashfords Road, Wagga Wagga City Council; • Dinawan Camp and Laydown; • 137 Cadell Road; • 6204 Yanga Way, Yanga; • 812 Windomal Road, Balranald; |

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| Key activity | Description of key activity |
|------------------------------------|--|
| | <ul style="list-style-type: none"> • 394 Hay Rd, Deniliquin; • 9 Lang Street, Wanganella; • 50 Elizabeth Avenue, Forest Hill; • 39 Urana Street, The Rock; • 2850 Lockhart the Rock Road, Tootool; • Old French Park-Bullenbong Road, French Park; • Richmond Street, Boree Creek; and • continued use of water supply points for the Project EnergyConnect (NSW – Western Section). <p>The establishment and use of water supply points are enabling works required early in the overall construction program to support road upgrades and pre-construction minor works, and to facilitate the commencement of substantial construction.</p> <p>The water supply points may require works to the existing infrastructure to enable connection and use by the water supply vehicles.</p> <p>The definition of ‘construction’ within the Infrastructure Approval excludes enabling works. The establishment and use of water supply points will therefore not be subject to the Stage 1 CEMP and CEMP sub-plans. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval.</p> |
| Utility adjustments and protection | <p>General utility protection and adjustment works, where required. In particular, to allow for the Wagga Wagga substation expansion and Dinawan substation installation, the establishment of the accommodation camp and the establishment and operation of the construction compound, and elsewhere as required.</p> <p>The definition of ‘construction’ within the Infrastructure Approval excludes minor adjustments to services/utilities for pre-construction minor works activities. Such adjustments for pre-construction minor works will therefore not be subject to the Stage 1 CEMP and CEMP sub-plans. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval.</p> |

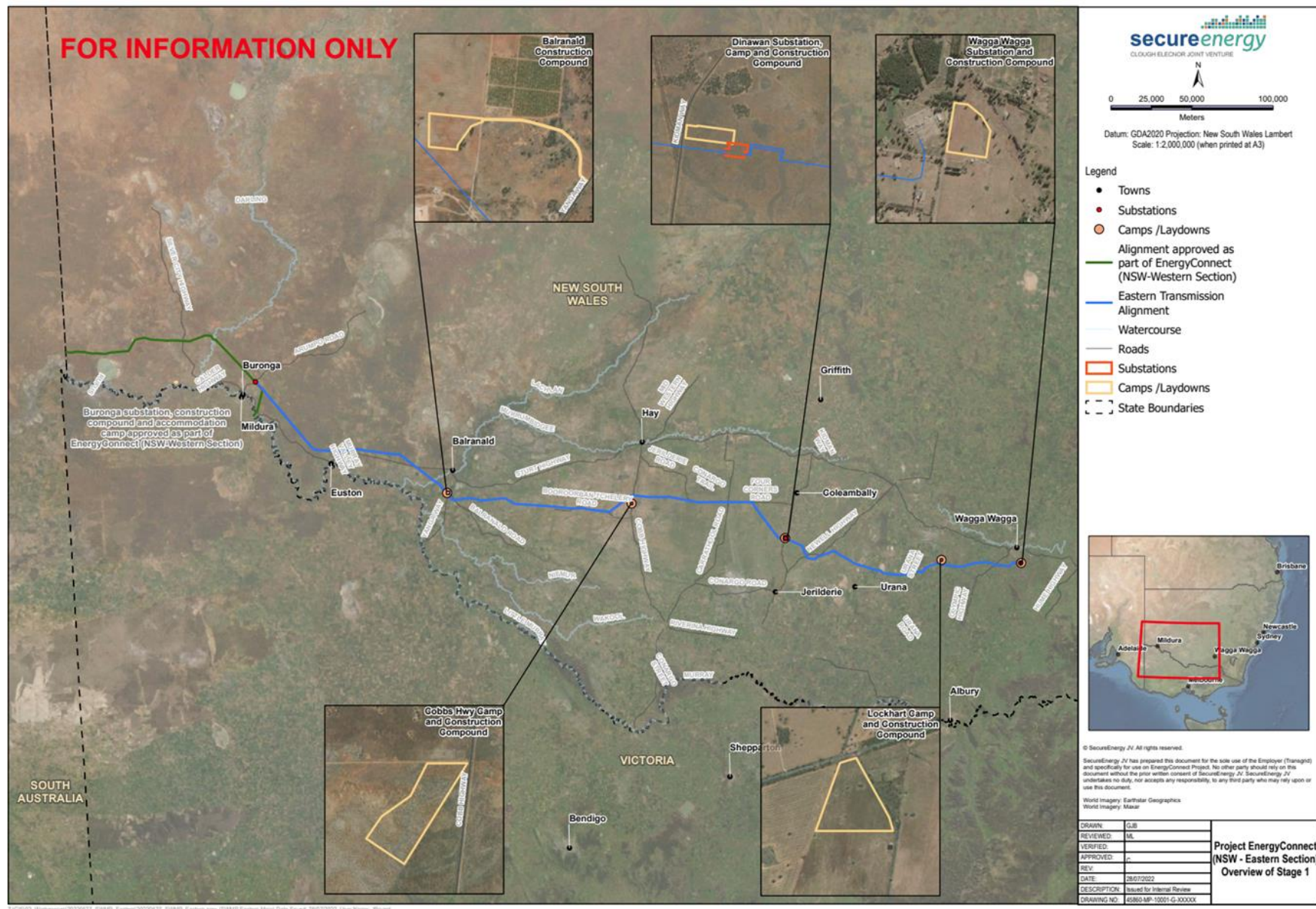


Figure 2.2 - Key features of EnergyConnect (NSW - Eastern Section)

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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.

Table 3.1 - Conditions relevant to this CEMP

| Condition number | Requirement | Where addressed | | | | | | | | | | | | | | | |
|------------------|--|---|-----------------------|---|-----|---------------------|-----|-----|----------------|-------------------------------|-----|--------------|-----|-----|----------|--------------|--|
| B1 | <p>Prior to commencing construction, an Environmental Management Plan (EMP) comprising the Sub-plans listed in Table 1 must be prepared by a suitably qualified and experienced persons, to the satisfaction of the Planning Secretary.</p> <p>Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Plan.</p> <p>Table 1: EMP Sub-plans</p> <table border="1"> <thead> <tr> <th></th> <th>Required EMP Sub-plan</th> <th>Relevant government agencies and stakeholders to be consulted for each EMP Sub-plan</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Noise and Vibration</td> <td>N/A</td> </tr> <tr> <td>(b)</td> <td>Soil and Water</td> <td>DPE Water Relevant Council</td> </tr> <tr> <td>(c)</td> <td>Biodiversity</td> <td>BCS</td> </tr> <tr> <td>(d)</td> <td>Heritage</td> <td>Heritage NSW</td> </tr> </tbody> </table> | | Required EMP Sub-plan | Relevant government agencies and stakeholders to be consulted for each EMP Sub-plan | (a) | Noise and Vibration | N/A | (b) | Soil and Water | DPE Water Relevant Council | (c) | Biodiversity | BCS | (d) | Heritage | Heritage NSW | <p>This Construction Environmental Management Plan has been prepared to address the requirements of an EMP.</p> <p>Construction will not commence until this CEMP and the CEMP Sub-plans are approved. This is detailed in Section 1.7.</p> <p>Consultation of the CEMP subplans are addressed in Section 1.6.</p> |
| | Required EMP Sub-plan | Relevant government agencies and stakeholders to be consulted for each EMP Sub-plan | | | | | | | | | | | | | | | |
| (a) | Noise and Vibration | N/A | | | | | | | | | | | | | | | |
| (b) | Soil and Water | DPE Water Relevant Council | | | | | | | | | | | | | | | |
| (c) | Biodiversity | BCS | | | | | | | | | | | | | | | |
| (d) | Heritage | Heritage NSW | | | | | | | | | | | | | | | |

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| Condition number | Requirement | Where addressed | | | | | | |
|------------------|--|---|--|---|-----|-----------------------|---------------------------|--|
| | <table border="1"> <tr> <td></td> <td></td> <td>Heritage Council Aboriginal stakeholders NPWS</td> </tr> <tr> <td>(e)</td> <td>Traffic and Transport</td> <td>TfNSW Relevant Council</td> </tr> </table> | | | Heritage Council Aboriginal stakeholders NPWS | (e) | Traffic and Transport | TfNSW Relevant Council | |
| | | Heritage Council Aboriginal stakeholders NPWS | | | | | | |
| (e) | Traffic and Transport | TfNSW Relevant Council | | | | | | |
| B2 | The EMP Sub-plans must be prepared in accordance with relevant guidelines and in consultation with the relevant government agencies identified for each Sub-plan in Table 1, and include : | Section 1.5 address the preparation of this CEMP and CEMP sub-plans | | | | | | |
| | a) a summary of relevant background or baseline data; | The relevant background or baseline data is provided within Section 3 of each of the CEMP sub-plans. | | | | | | |
| | b) details of: | The relevant statutory requirements are addressed in Section 3 and Appendix A1 of this CEMP, and Section 2 of the CEMP sub-plans. | | | | | | |
| | (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); | | | | | | | |
| | (ii) any relevant limits or performance measures and criteria; | Section 4.2 of this CEMP addresses the performance measures, criteria and performance indicators. | | | | | | |
| | (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; and | | | | | | | |
| | (iv) any relevant commitments or recommendations identified in the EIS; | 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. | | | | | | |
| | c) a description of the management 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 in Section 5 or 6 of the relevant CEMP sub-plan. | | | | | | |
| | d) a program to monitor and report on the: | Tables summarising the monitoring and reporting requirements are provided in Section 9.2 and 10 of this CEMP. Environmental inspections will be used to monitor the effectiveness of management measures. This is addressed in Section 9.1. | | | | | | |
| | (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 | | | | | | | |
| | (ii) effectiveness of the management measures set out pursuant to paragraph (c); | | | | | | | |
| | e) 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. | | | | | | |
| | f) 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. | | | | | | |

| Condition number | Requirement | Where addressed |
|------------------|--|---|
| | <p>g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> (i) incident, non-compliance or exceedance of any impact assessment criterion or performance criterion; (ii) complaint; or (iii) failure to comply with other statutory requirements; <p>h) public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and</p> <p>i) a protocol for periodic review of the EMP and EMP Sub-plans</p> <p>The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</p> | <p>Managing and reporting incidents is addressed in Section 8 of this CEMP.</p> <p>Non-compliances are addressed in Section 10.1 and 11 of this CEMP.</p> <p>Exceedance of any impact assessment criterion is addressed in Section 9.2.</p> <p>Exceedance of any performance criterion is addressed in Section 4.2.</p> <p>Managing and reporting complaints are addressed in Section 7.2 of this CEMP.</p> <p>Managing and reporting other statutory requirements are addressed in Section 10.1.3 of this CEMP.</p> <p>All public source of information are available on the project's website (https://www.transgrid.com.au/projects-innovation/energyconnect) and detailed in Section 7.1.2.</p> <p>Periodic review of the CEMP and CEMP sub-plans are addressed in Section 1.10 of this CEMP.</p> <p>Noted</p> |
| D1 | <p>The Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> a) provide the strategic framework for environmental management of the development; b) identify the statutory approvals that apply to the development; c) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; d) set out the procedures that would be implemented to: <ul style="list-style-type: none"> (i) keep the local community and relevant agencies informed about the construction, operation and environmental performance of the development; | <p>The preparation of an Environmental Management Strategy has been addressed by the development of this Construction Environmental Management Plan. The requirements of condition D1 have been addressed in this plan, in the locations detailed below.</p> <p>The environmental management framework for the development is provided in Section 4. Figure 4.1 shows the environmental management system.</p> <p>The statutory approvals and requirements are addressed in Section 3 and Appendix A1 of this CEMP and Section 2 of each of the CEMP sub-plans.</p> <p>The roles, responsibilities, authorities and accountabilities of key personnel are detailed within Section 4.9 of this CEMP.</p> <p>Communication with the local community and relevant agencies is addressed in Section 7 of this CEMP.</p> |

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| Condition number | Requirement | Where addressed |
|------------------|--|--|
| | (ii) receive record, handle and respond to complaints; (iii) resolve any disputes that may arise during the course of the development; | Managing and reporting complaints and disputes are addressed in Section 7.2 of this CEMP. |
| | (iv) respond to any non-compliance and any incidents; | The response to non-compliances is outlined in Section 10.1 and 11. The response to any incidents including managing and reporting is outlined in Section 8. |
| | (v) respond to emergencies; and | How emergencies will be responded to is provided within Section 8.1 of this CEMP. |
| | e) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and | Section 4.3 references the strategies, plans and programs approved under the Infrastructure Approval. |
| | (ii) a clear plan depicting all the monitoring to be carried out under the conditions of this consent. | All monitoring to be carried out is outlined in Section 9 of this CEMP and Section 6.3 of each CEMP Sub-plan. |
| | The Proponent must not commence construction until the Environmental Management Strategy is approved by the Planning Secretary. The Proponent must implement the Environmental Management Strategy as approved by the Planning Secretary. | Construction will not commence until this CEMP and the CEMP Sub-plans are approved. This is detailed in Section 1.7. Section 1.7 also commits to the implementation of this CEMP. |

3.3 Revised mitigation measures

Environmental safeguards and mitigation measures are included in Section 23.1.4 of the EIS. During preparation of the Submissions Report, the RMMs were amended and included in Appendix B.

There are no specific RMMs relevant to the preparation of this CEMP identified in the Submissions Report. RMMs relevant to a specific environmental aspect along with the proposed management measures are dealt with in the relevant CEMP sub-plan as described in Section 4.3.1.

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*.

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 HSSE Management Expectation 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"> • Environment Management Operating Standard; and • Major Accident Event Hazard Management Operating Standard. |
| 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.

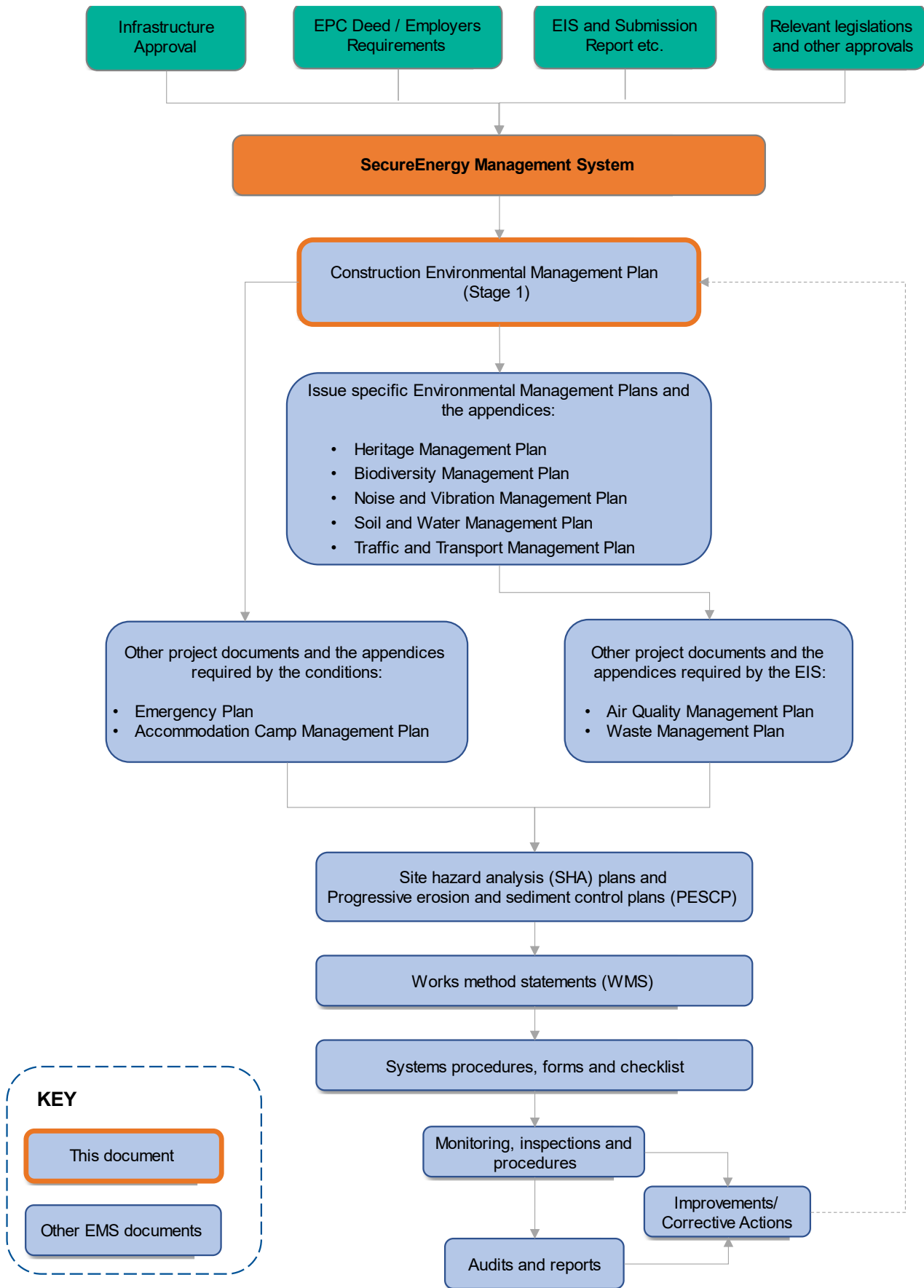


Figure 4.1 - Environmental Management System Process

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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 below 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"> • Full compliance with statutory approvals. • No regulatory infringements (PINs or prosecutions). • No formal regulatory warning. | 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"> • Zero non-compliances identified during each compliance audit of CEMP and sub-plans. | Number of non-compliance arising from each audit. |
| | Address all corrective and preventative actions arising from audits | <ul style="list-style-type: none"> • All corrective and preventative actions arising from audits closed out within specific timeframes. | 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"> • All incidents reported in accordance with this management plan. • All risks reviewed in accordance with the SecureEnergy management system. | 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. Record and respond to complaints within a timely manner. | <ul style="list-style-type: none"> • All project updates provided within the timeframes specific within the <i>Community Communication Strategy</i>. • All complaints are review within the timeframes specific within the <i>Community Communication Strategy</i>. | 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 |
|--------------------------|---|--|---|
| 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"> Regular environmental training that focuses on the specific project activities and associated environmental risks. Regular pre-start meetings and toolbox talks in accordance with Section 6. | 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"> 100% completion of scheduled audits and weekly inspections. | 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 Stage 1 of the project delivery. The CEMP describes the construction environmental management framework for the project and the system for minimising and managing environmental risks.

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 CEMP 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 B1 of the Infrastructure Approval. The sub-plans document the environmental aspects, impacts and management measures for each key environmental value. The sub-plans are provided in Appendix B.

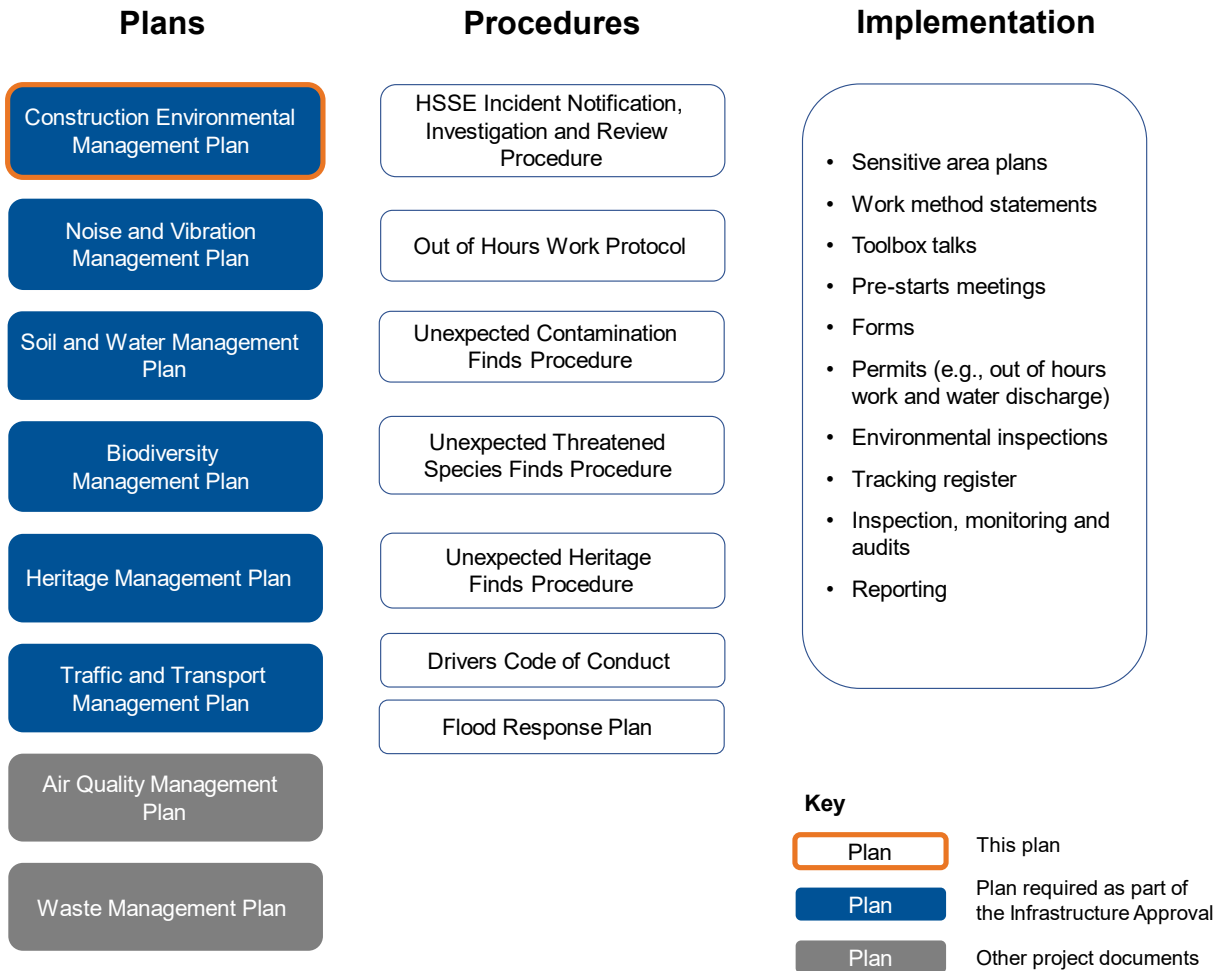


Figure 4.2 - CEMP framework

Table 4.3 - CEMP and CEMP sub-plans

| Document name | Condition | Applicable to Stage 1 | Document Number | Location |
|--|-----------|-----------------------|---------------------|------------------|
| Construction Environmental Management Plan | B1 and D1 | Yes | 45860-HSE-PL-D-0108 | This plan |
| Heritage Management Plan (HMP) | C30 | Yes | 45860-HSE-PL-D-0113 | Appendix B5 HMP |
| Biodiversity Management Plan (BMP) | C26 | Yes | 45680-HSE-PL-D-0111 | Appendix B3 BMP |
| Traffic and Transport Management Plan (TTMP) | C35 | Yes | 45860-HSE-PL-D-0109 | Appendix B1 TTMP |
| Noise and Vibration Management Plan (NVMP) | C10 | Yes | 45860-HSE-PL-D-0110 | Appendix B2 NVMP |
| Soil and Water Management Plan (SWMP) | C22 | Yes | 45860-HSE-PL-D-0112 | Appendix B4 SWMP |

4.3.2 Other documents

Other documents that are required by the Infrastructure Approval are provided in Table 4.4.

Table 4.4 - Other documents

| Document name | Condition | Document Number |
|--|-----------|----------------------|
| Community Communication Strategy | A22 | 45860-HSE-DOC-D-0024 |
| Out-of-Hours Work Protocol | C10 | 45860-HSE-PR-D-0011 |
| Emergency Plan | C45 | 45860-HSE-PL-D-0129 |
| Accommodation Camp Management Plan – Lockhart | C50 | 45860-HSE-PL-D-0124 |
| Accommodation Camp Management Plan – Dinawan | C50 | 45860-HSE-PL-D-0125 |
| Accommodation Camp Management Plan – Cobbs Hwy | C50 | 45860-HSE-PL-D-0126 |
| Accommodation Camp Management Plan – Buronga | C50 | 45860-HSE-PL-G-1027 |
| Local Business and Employment Strategy | C51 | 45860-CM-PL-G-1004 |

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 (i.e. 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;
- Aboriginal and non-Aboriginal heritage sites;
- waterbodies/waterways and riparian zones;
- 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-0112). The PESCPs will show the site layout and approximate location of erosion and sediment control structures on-site. PESCPs will be updated as required as 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 any 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 Work Packs or WMSs. For further details regarding soil and water management refer to the *Soil and Water Management Plan* (45860-HSE-PL-D-0112).

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-D-0013 | Appendix A of the HMP |
| Pre-clearing and Clearing Procedure | 45860-HSE-PR-D-0015 | Appendix A of the BMP |
| Unexpected Threatened Species Finds Procedure | 45860-HSE-PR-D-0012 | Appendix B of the BMP |
| Fauna Handling Procedure | 45860-HSE-PR-D-0020 | Appendix C of the BMP |
| Biosecurity Management Plan | 45860-HSE-PL-D-0127 | Appendix D of the BMP |
| Erosion and Sediment Control Strategy | 45860-HSE-PR-D-0016 | Appendix A of the SWMP |
| Unexpected Contamination Finds Procedure | 45860-HSE-PR-D-0014 | Appendix B of the SWMP |
| Spill Response Procedure | 45860-HSE-PR-D-0017 | Appendix C of the SWMP |
| Dewatering Procedure | 45860-HSE-PR-D-0018 | Appendix D of the SWMP |
| Out-Of-Hours-Work Protocol | 45860-HSE-PR-D-0011 | Appendix A of the NVMP |
| Drivers Code of Conduct | 45860-HSE-PR-D-0019 | Appendix A of the TTMP |
| Flood Response Plan | 45860-HSE-PL-D-0122 | Appendix B of the TTMP |

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| Document name | Document Number | Location |
|-----------------------------|---------------------|-------------|
| Air Quality Management Plan | 45860-HSE-PL-D-0120 | Part of EMS |
| Waste Management Plan | 45860-HSE-PL-D-0121 | Part of EMS |

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 volume of waste to landfill, waste recycled, and waste disposed of offsite.

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.

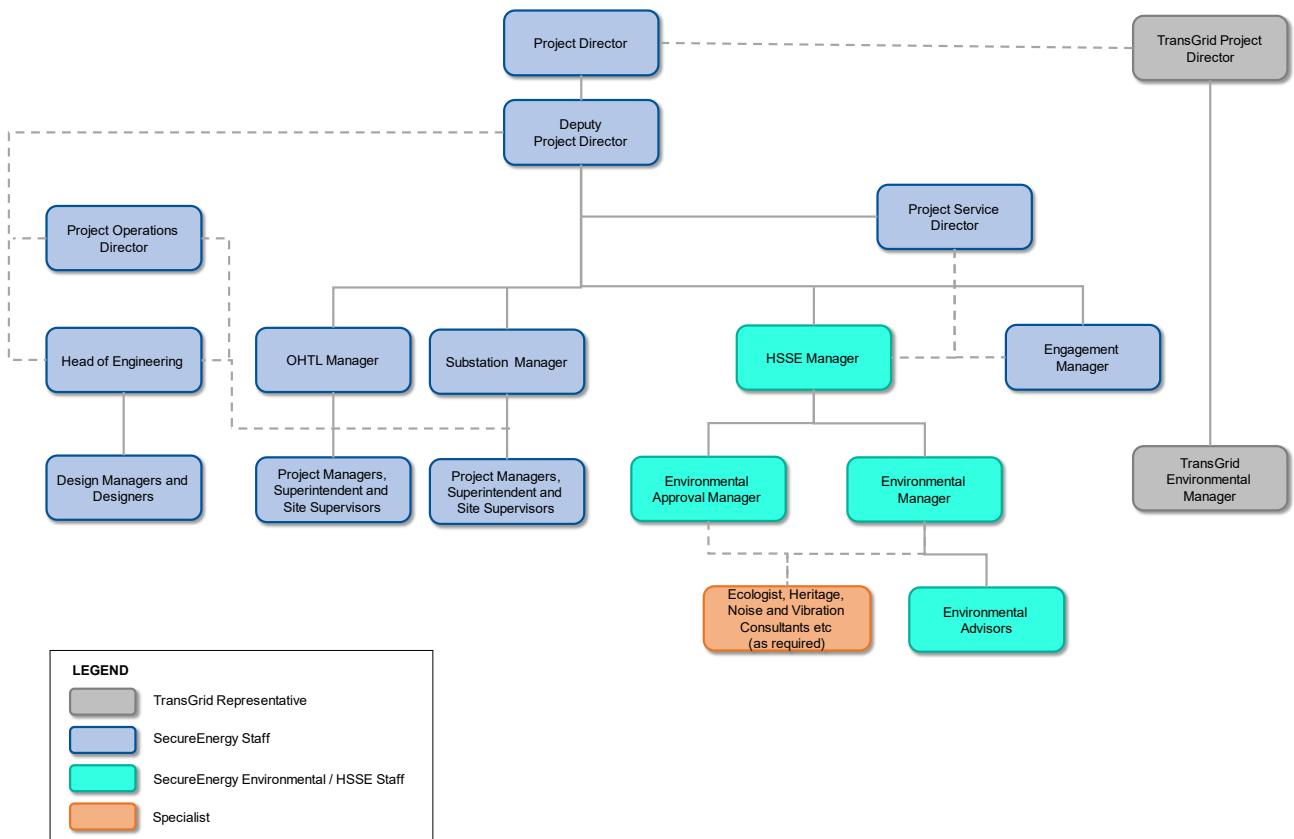


Figure 4.3 - Key roles within the organisation structure

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 |
|-------------------------------------|---|
| Appointed Roles | |
| Environmental Representative | Authority |
| | <ul style="list-style-type: none"> • Appointed by the Planning Secretary in accordance with condition A9 of the Infrastructure Approval. |
| | Responsibility |
| | <p>The responsibilities of the Environmental Representative (ER) include:</p> <ul style="list-style-type: none"> • 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; • assist the Department in the resolution of community complaints as requested by the Planning Secretary; and • 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. <p>Note the ER will be a suitably qualified and experienced person, approved by the Planning Secretary no later than one week before commencement of the development. 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> |
| Accountability | |
| | <ul style="list-style-type: none"> • Meet the requirements set out in conditions A11 and A12 of the Infrastructure Approval. |
| Transgrid | |
| Transgrid Project Director | Authority |
| | <ul style="list-style-type: none"> • Appointed by Transgrid. • Directly manages the Transgrid’s Project Management Team. |
| | Responsibility |
| | <p>The environmental responsibilities of the Transgrid Project Director include:</p> <ul style="list-style-type: none"> • monitor the environmental performance of the project in relation to Transgrid requirements; • liaise with relevant stakeholders; • attend project meetings. |
| Accountability | |
| | <ul style="list-style-type: none"> • Delivering the project relevant to the requirements of Transgrid. |

| Role | Responsibilities |
|--|--|
| Transgrid Environmental Manager | Authority |
| | <ul style="list-style-type: none"> • Management and direction of the Transgrid’s Environment Team. |
| | Responsibility |
| | <p>The responsibilities of the Transgrid Environmental Manager include:</p> <ul style="list-style-type: none"> • liaise between SecureEnergy and stakeholders (including government agencies) as required; • undertake periodic inspections of the project sites to identify environmental non-compliances; • review changes to the project for consistency with the project environmental assessment and approval documentation; • provide guidance and where appropriate, monitor compliance with the Department post approval document submission requirements; • review environmental management plans and related documents prepared for the project; and • monitor the environmental performance of the project in relation to Transgrid requirements and the Department post-approval document submission requirements. |
| Accountability | |
| <ul style="list-style-type: none"> • Delivery of the environmental requirements of the project relevant to Transgrid. | |
| SecureEnergy | |
| Project Director | Authority |
| | <ul style="list-style-type: none"> • Appointed by SecureEnergy. • Directly manages the Deputy Project Director. |
| | Responsibility |
| | <p>The environmental responsibilities of the Project Director include:</p> <ul style="list-style-type: none"> • overall delivery of the project program; • manage all key aspects of project performance, including environmental performance; • ensure project practices and on-site activities are conducted in accordance with project policies and procedures; • direct activities to ensure resource needs are accurately forecasted and linked to the project, including the identification of skill and behaviour requirements; • ensure personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP; • ensure resources are available to enable execution of project environmental management activities and project emergency response systems; • drive the creation of systems, practices and behaviours that promote the identification and appropriate management of potential risks and opportunities; • approve all management plans prior to their implementation; and • attend and participate in environmental meetings as appropriate. |
| Accountability | |
| <ul style="list-style-type: none"> • Delivering the project relevant to the requirements of SecureEnergy. | |
| Deputy Project Director | Authority |
| | <ul style="list-style-type: none"> • Appointed by SecureEnergy. • Directly manages key personnel in the Project Management Team. |
| | Responsibility |
| <p>The environmental responsibilities of the Deputy Project Director include:</p> <ul style="list-style-type: none"> • support the overall delivery of the project program; • manage key aspects of project performance, including environmental performance; • ensure project practices and on-site activities are conducted in accordance with project policies and procedures; | |

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| Role | Responsibilities |
|--|--|
| | <ul style="list-style-type: none"> • ensure personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP; • direct activities to ensure resource needs are accurately forecasted and linked to the project, including the identification of skill and behaviour requirements; • ensure resources are available to enable execution of project environmental management activities and project emergency response systems; • ensure resources are available to eliminate or minimise environmental hazards; • participate in incident investigations and review all incident reports as appropriate; • ensure all management plans are fully developed and implemented; and • attend and participate in environmental meetings as appropriate. <p>Accountability</p> <ul style="list-style-type: none"> • Delivering the project relevant to the requirements of SecureEnergy. |
| <p>Project Operations Director</p> | <p>Authority</p> |
| | <ul style="list-style-type: none"> • Management and direction of the construction team, including Supervisors. |
| | <p>Responsibility</p> |
| | <p>The environmental responsibilities of the Project Operations Director include:</p> <ul style="list-style-type: none"> • delivery of the construction aspects of the project; • ensure resources are available to eliminate or minimise environmental hazards; • ensure subcontractors understands their environmental responsibilities as required in the Contract; • participate in incident investigations; • participate in HAZID workshops as required; • participate in workplace inspections and audits; • attend and participate in environmental meetings as appropriate; • review work planning requirements; • provide construction and field management and supervisors with environmental information current to their requirements; • interface with client environmental personnel during their site visits (as required); and • provide project line management with feedback on environmental performance. |
| <p>Health, Safety, Sustainability & Environment Manager</p> | <p>Authority</p> |
| | <ul style="list-style-type: none"> • Management and direction of the Health Safety, Sustainability and Environment Team. |
| | <p>Responsibility</p> |
| | <p>The responsibilities of the Health, Safety, Security and Environment Manager include:</p> <ul style="list-style-type: none"> • deliver the HSSE aspects of the project in accordance with contract and legislative requirements; • communicate the HSSE requirements to the project management team and HSSE Teams; • review HSSE standards and plans developed for each project to ensure that legislative requirements are met; • review overall HSSE performance and report to the project management team and Corporate HSSE Manager; • interface with major subcontractors and Transgrid management, and with HSSE personnel as required regarding HSSE matters; • attend third party certification audits; • specify resources to enable execution of HSSE activities on-site; • arrange for and participate in HAZID workshops; • provide HSSE Advisors, project line management and subcontractors with feedback on HSSE performance; • participate in the Target Zero commitment workshop; |

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| Role | Responsibilities |
|--|--|
| | <ul style="list-style-type: none"> • implement and coordinate Target Zero activities and strategies; • receive and circulate relevant HSSE information; • participate in scheduled HSSE audits and reviews; • statistical analysis and incident trend reviews; • attend and participate in HSSE meetings as required; • coordinate and participate in workplace inspections; and • record, monitor and follow up close out of action items in InControl. <p>Accountability</p> <ul style="list-style-type: none"> • Delivering the HSSE aspects of the project relevant to the requirements of SecureEnergy. • Communication of HSSE requirements to the project management and HSSE Teams. |
| Environmental Approvals Manager | <p>Authority</p> <ul style="list-style-type: none"> • Management and direction of the Environment Approvals Team. <p>Responsibility</p> <p>The responsibilities of the Environmental Approvals Manager include:</p> <ul style="list-style-type: none"> • assist in communicating the environmental approval requirements to project personnel; • communicate and liaise with Transgrid in relation to approval documents and matters; • develop and review the CEMP and SecureEnergy management plans; • review, and where required, revise environmental management documents; • review proposed project changes and where required, prepare consistency assessments. Where consistency assessments are required Transgrid’s Environmental Manager will be informed; • develop training and induction content, where required; • organise and participate in meetings as required; and • specify the resources required to develop environmental approval documents. <p>The role of the Environmental Approvals Manager will be phased out depending on SecureEnergy’s requirements and the stage of the project.</p> <p>Accountability</p> <ul style="list-style-type: none"> • Implementation and delivery of the environmental approval requirements of the project • Communication of environmental approval requirements to the project management and Environmental Teams |
| Environmental Manager | <p>Authority</p> <ul style="list-style-type: none"> • Management and direction of the Environment Team. <p>Responsibility</p> <p>The responsibilities of the Environmental Manager include:</p> <ul style="list-style-type: none"> • implement and deliver the environmental requirements of the project; • communicate the environmental requirements to project personnel; • communicate and liaise with Transgrid in relation to environmental performance and compliance matters; • implement the CEMP and SecureEnergy management plans; • monitor and report compliance of the works in relation to the approved documents; • review, and where required, revise environmental management documents; • 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; • specify the resources required to enable execution of environmental activities on-site; • arrange and participate in HAZID workshops; • provide environmental coordinators, project line management, and SecureEnergy with feedback on environmental performance; • participate in the Target Zero commitment workshop; • coordinate and participate in scheduled environmental audits and reviews; |

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| Role | Responsibilities |
|-------------------------------|---|
| | <ul style="list-style-type: none"> • undertake statistical analysis and environmental incident trend reviews; • develop training and induction content; • promote environmental management improvements initiatives; • organise and participate in environmental meetings as required; • coordinate and participate in workplace inspections; • record, monitor and follow up close out of action items in InControl; • provide leadership in the implementation of all environmental initiatives; and • specify the resources required to enable execution of environmental activities. <p>Accountability</p> <ul style="list-style-type: none"> • Implementation and delivery of the environmental requirements of the project. • Communication of environmental requirements to the project management and Environmental Team. |
| Environmental Advisors | <p>Authority</p> <ul style="list-style-type: none"> • Advise of environmental assignments or actions which are required to occur. <p>Responsibility</p> <p>The responsibilities of the Environmental Advisor include:</p> <ul style="list-style-type: none"> • communicate environmental requirements to project personnel including Superintendents and Supervisors; • being accountable for ongoing development and implementation of project environmental activities and practices; • record, monitor and follow up close out of action items; • develop and update environmental management documents; • ensure corrective actions are implemented; • participate in Target Zero workshops; • comply with statutory requirements; • liaise with supervisors on relevant environmental issues; • organise and participate in environmental meetings; • report and investigate environment incidents in the area of control; • review and close out environmental incident reports; • deliver the environmental component of training and induction such as site induction, toolbox talks and pre-start meetings as required; • provide support and direction to all supervisors through positive discussions on environmental initiatives; • conduct weekly workplace inspections; • monitor high environmental risk activities and the commencement of activities in new areas or areas with significant environmental sensitivities; • report all incidents and hazards to management; • monitor the use and maintenance of spill kits at all work sites. <p>Accountability</p> <ul style="list-style-type: none"> • Communication of environmental requirements to project personnel including Superintendents and Supervisors. • Being accountable for ongoing development and implementation of project environmental activities and practices. |
| Supervisors | <p>Authority</p> <ul style="list-style-type: none"> • Direct works undertaken by project persone <p>Responsibility</p> <p>The environmental responsibilities of the Supervisors include:</p> <ul style="list-style-type: none"> • plan for and incorporating environmental management into all work plans and activities; • ensure that instructions are issued and adequate information provided to field-based employees which relate to environmental risks on-site; |

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| Role | Responsibilities |
|---|---|
| | <ul style="list-style-type: none"> • participate in HAZID workshops and audits; • motivate employees to report all environmental incidents; • participate in Target Zero workshops; • conduct inspections of their work area per the Audit and Inspection Schedule; • plan and incorporate environmental management into all work plans and activities; • open and maintain external communication during emergencies; • report all incidents and hazards to management; • comply with statutory requirements; • participate in any relevant environmental training; • deliver the environmental component of training and induction such as toolbox talks and pre-start meetings as required; • provide suggestions to improve environmental management on the project; • participate in site environmental meetings as required. |
| | <p>Accountability</p> |
| <p>All personnel, including subcontractors</p> | <p>Authority</p> <ul style="list-style-type: none"> • Undertaking works in accordance with the CEMP and management plans. <p>Responsibility</p> <p>The environmental responsibilities of all personnel include:</p> <ul style="list-style-type: none"> • undertake works in accordance with the Clough's Management System and management plans; • follow directions from senior staff and project environmental personnel in relation to environmental matters; • follow the instructions in the WMS in relation to environmental matters; • participate in any relevant environmental training; • report any near miss or environmental incidents to their Supervisors; and • provide suggestions to improve environmental management on the project. <p>Accountability</p> <ul style="list-style-type: none"> • Works undertaken at the direction of their relevant supervisor. |

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 and ongoing advice throughout construction;
- heritage consultants for review of the Heritage Management Plan 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, hazards and 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 hazard and risk assessments are to:

- identify hazardous 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 hazards and 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 hazard and 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 | | |
| Technical HSSE Assessments | | | | | | | | | | |
| 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 |
| Threat Specific HSSE Hazard Assessment (where applicable to project) | | | | | | | | | | |
| 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 |
| Task Based HSSE Hazard Assessment | | | | | | | | | | |
| 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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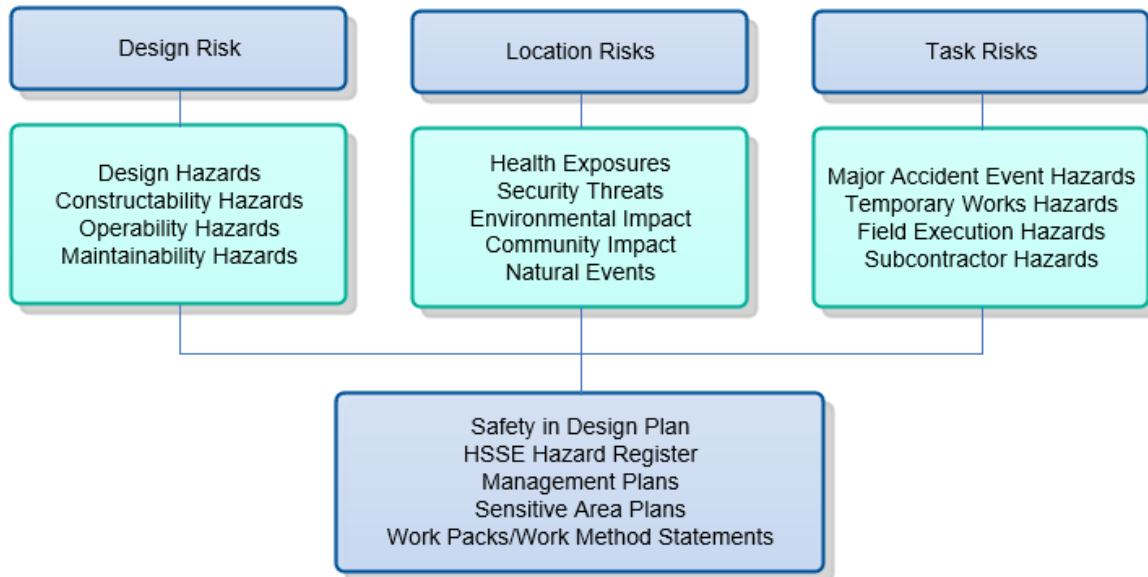


Figure 5.1 - HSSE Risk Management Framework

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 activity. 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 briefings 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 Infrastructure Approvals, environmental licences and permits;
- the location of key features of environmental and heritage sensitivity (i.e. heritage sites, threatened species and ecological communities) and where this information can be found;
- relevant environmental management requirements and responsibilities;
- 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.

6.2 Toolbox talks

Toolbox talks will be delivered by various SecureEnergy personnel such as 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;
- erosion and sedimentation control; and
- working hours and the out-of-hours work process.

6.3 Daily pre-start meetings

Daily pre-start 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 briefings and/or targeted environmental briefings

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 hazard assessments. WMS briefings will be delivered by 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 briefings 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 briefings 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-HSE-DOC-D-0024) 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 but not be limited to:

- 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.transgrid.com.au/projects-innovation/energyconnect>; and
- enquiries and complaints line (24 hour) on 1800 490 666.

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 are 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. |

| Action | Description |
|-------------|---|
| 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. |
| 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 days of receipt. Where a phone number or email address is supplied, a response will be provided within 24 hours.

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. The Department 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 the 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).

8.2 Environmental incidents

In the event of an environmental incident, the Incident, Notification and Investigation Procedure Flowchart provided in 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 and 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 notification and 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 the Infrastructure Approval. As such, Transgrid will notify the Department via the Major Projects website immediately after becoming aware that an incident has occurred. A written notification will then be provided to the Department 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 the Department 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 notification and 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 DCCEEW in accordance with the requirements of the EPBC Act Approval.

8.3.3 Incident notification and 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 | Site diary 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 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.

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Table 9.2 - Environmental monitoring summary

| Condition/RMM | Activity | Management Plan | Description | Timing |
|---------------|----------------------------------|---------------------------------------|--|--|
| RMM TA15 | Road and surface condition | Traffic and Transport Management Plan | Visual monitoring of road and surface conditions and the traffic controls implemented. | During construction |
| RMM AQ6 | Air quality | Air Quality Management Plan | Visual monitoring of effectiveness of implemented controls to reduce dust generation and odour emission. | During construction |
| RMM HF4 | Water quality monitoring program | Soil and Water Management Plan | Monitoring of water quality conditions in Murrumbidgee River and Colombo Creek. | Pre-construction and during construction |
| 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. | During construction |

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 actions 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.

In accordance with condition D11 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 outlined 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 conditions D7 and D8 of the Infrastructure Approval.

In summary condition D7 and D8 requires the Planning Secretary to 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 DCCEE in accordance with the requirement of the EPBC Act. Transgrid will notify DCCEE 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

| Report | Requirement | Timing | Responsibility | Recipient |
|------------------------------|--|---|------------------------------------|----------------|
| Monthly environmental report | For incorporation in project Monthly Reports. | Monthly | SecureEnergy Environmental Manager | Transgrid |
| 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 | The Department |
| Non-compliance notification | Planning Secretary must be notified within 7 days after identifying the non-compliance. | As required | SecureEnergy/ Transgrid | The Department |
| Independent audit report | As per the reporting requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> . | Within 12 weeks of the commencement of construction and at six-monthly intervals for | SecureEnergy/ Transgrid | The Department |

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| Report | Requirement | Timing | Responsibility | Recipient |
|--------|-------------|---|----------------|-----------|
| | | subsequent reports. Audit reports to be provided within 2 months of the audit date. | | |

11 Non-compliance, 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 the 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 |
|---|---------------------------------|------------------------|--|--|---------------------------|
| Commonwealth Legislation | | | | | |
| <i>Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i> | 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 (now known as Department of Climate Change, Energy, the Environment 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"> 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. | 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 - Eastern 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, the Heritage Management Plan will be updated if required. | Transgrid SecureEnergy |

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EnergyConnect (NSW - Eastern Section) Stage 1 Construction Environmental Management Plan

| Legislation/Regulations | Aspect | Reference | Requirement | Applicability | Responsibility |
|--|-------------------|---------------------|---|--|---------------------------|
| | | 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 |
| | | 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 various native title areas associated with various Traditional Owners and Aboriginal groups. The various Traditional Owners and Aboriginal groups will be included in consultation. | Transgrid SecureEnergy |
| New South Wales Legislation | | | | | |
| <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&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 <i>Environmental Impact Statement EnergyConnect (NSW - Eastern Section)</i> - was submitted to Department of Planning and Environment in January 2022 and publicly exhibited between 19 January 2022 and 15 February 2022. In May 2022, the response to submissions was finalised in the <i>Submissions Report EnergyConnect (NSW - Eastern Section)</i> . A separate <i>Amendment Report EnergyConnect (NSW - Eastern Section)</i> , to document design changes and additional environmental assessment undertaken, was also finalised in May 2022. | Transgrid |

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EnergyConnect (NSW - Eastern Section) Stage 1 Construction Environmental Management Plan

| Legislation/Regulations | Aspect | Reference | Requirement | Applicability | Responsibility |
|--|--|------------------------------------|--|---|---------------------------|
| | | 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 generally in accordance with the revised mitigation measures from the Response to DPIE Request for Information. | The project requires approval from the NSW Minister for Planning under Division 5.2, Part 5 of the EP&A Act. The project was assessed as above. Approval for EnergyConnect (NSW - Eastern Section) was granted by the Minister for Planning. | 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 roads 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 (BC Act)</i> | 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 Biodiversity Conservation Act 2016, together with the Biodiversity Conservation Regulation 2017, 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. | 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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| 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 SecureEnergy |
| <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 clear 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&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 - Eastern Section) Stage 1 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 various native title areas associated with various Traditional Owners and Aboriginal groups. The various Traditional Owners and Aboriginal groups will be included in consultation. | 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 | Yes, the WM Act applies to areas of New South Wales that have a water sharing plan. The project area is subject to numerous water sharing plans: | SecureEnergy |

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| Legislation/Regulations | Aspect | Reference | Requirement | Applicability | Responsibility |
|-------------------------|--|--|---|--|----------------|
| | | | and includes coastal waters) without an access licence. | <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"> • clause 7 provides an exemption for water taken in the course of certain aquifer interference activities (in relation to taking up to 3 ML of groundwater from a groundwater source); and • 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. <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"> • interception activities (i.e. intercepted groundwater during piling); • potable uses for human consumption associated with the accommodation camp. | |
| | 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>Under Section 91, there are two kinds of activity approvals, controlled activity approvals and aquifer interference approvals. 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>Section 5.23 of the EP&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 may be required when an activity involves any of the following:</p> <ol style="list-style-type: none"> a) the penetration of an aquifer, b) the interference with water in an aquifer, | SecureEnergy |

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| Legislation/ Regulations | Aspect | Reference | Requirement | Applicability | Responsibility |
|---|-------------------------|----------------------------|--|--|----------------|
| | | | 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>c) the obstruction of the flow of water in an aquifer,</p> <p>d) the taking of water from an aquifer in the course of carrying out mining, or any other activity prescribed by the regulations,</p> <p>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 NSW Aquifer Interference Policy, 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&A Act, or required or undertaken as a result of an environmental assessment under Part 5 of EP&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</i> (POEO Act) | Schedule 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>Environment protection licences (EPL) is required for the carrying out of scheduled activities as listed under Schedule 1 of the Act. EPL is likely to be required for the following scheduled activities:</p> <p>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 | Do not risk harming the environment by wilfully or negligently: | Yes, the relevant management measures are included within the Soil and Water Management | SecureEnergy |

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| Legislation/Regulations | Aspect | Reference | Requirement | Applicability | Responsibility |
|-------------------------|-------------------------------------|----------------|--|--|----------------|
| | | Section 117 | <ul style="list-style-type: none"> disposing of waste unlawfully. causing any substance to leak, spill or otherwise escape (whether or not from a container); or causing any controlled substance to be emitted into the atmosphere. | Plan, Waste Management Plan and Air Quality Management Plan. | |
| | Water pollution | Section 120 | Do not cause or permit water pollution. | 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 |

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EnergyConnect (NSW - Eastern Section) Stage 1 Construction Environmental Management Plan

| Legislation/Regulations | Aspect | Reference | Requirement | Applicability | Responsibility |
|--|---|-------------|---|--|--|
| | 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 |
| <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> <i>Work Health and Safety and Regulation 2011</i> | 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 HSSE Plan. | 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. | 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 |
|-----------------------------|--|-----------|--|---|----------------|
| | | | <p>To facilitate recovery of expenses incurred in the administration of this Act and the collection of fees and charges payable.</p> <p>To provide for additional matters concerning the regulation of road users and road transport and the improvement of road safety in this jurisdiction.</p> | | |
| <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

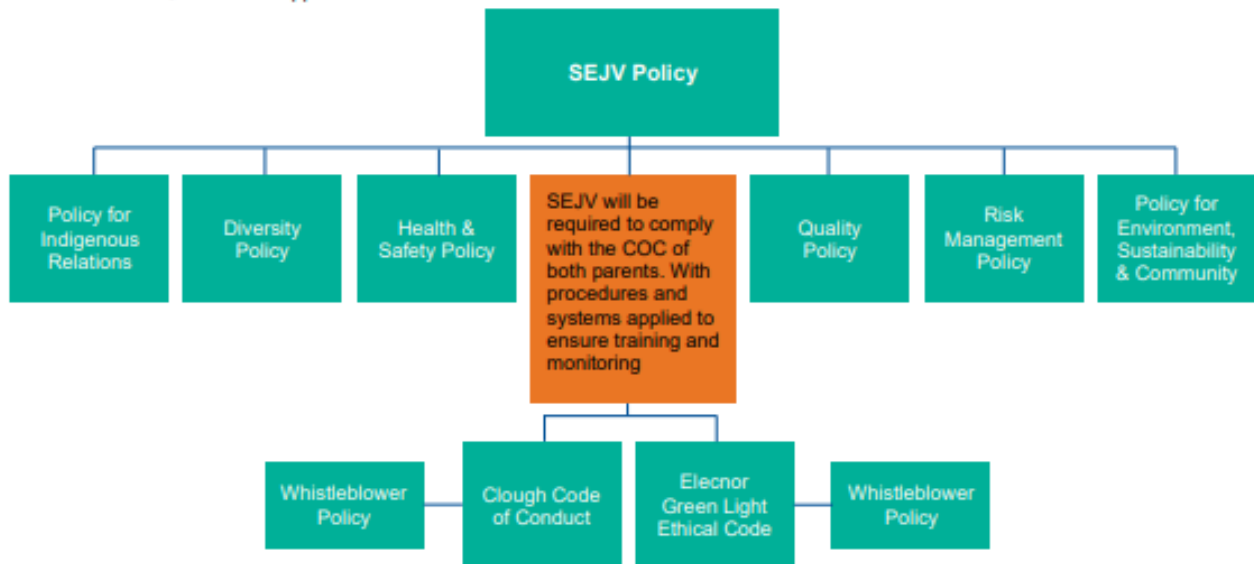
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SecureEnergy Policy Model

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
 SteerCo Member - Clough
 SecureEnergy JV
 Date 10/02/2021


Carlos Fernandez (Feb.25, 2021 10:48 EST-01)
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 (Feb.16, 2021 09:11)
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 14001:2004 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:

- **Personal Responsibility** – 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.
- **Social Responsibility** – Clough respects the traditional rights of indigenous peoples and values cultural heritage in the areas we work.
- **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 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.
- **One Consistent Approach** - 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 2018

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-POL-G-0014

Rev No. 8



Appendix A3 – Environmental Aspect and Impact Register

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| No. | Activity | Environmental category | Impact/Risk | Aspect/Cause | Possible Outcome | Consequence | Likelihood | Initial Risk Rating | Risk Management Measures (DRAFT) | Consequence | Likelihood | Residual Risk Rating | Risk Owner |
|-----|-----------------------------------|------------------------|--|---|--|--------------|----------------|---------------------|---|--------------|------------|----------------------|----------------------------|
| 1 | Earthworks Vegetation clearing | Heritage | Damage to heritage items, including culturally significant sites, artefacts and heritage values | 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. | <ul style="list-style-type: none"> Unapproved impacts to heritage items Loss of items of cultural significance Impacts to relationships with traditional owners Potential regulatory action from agencies Project delays Financial penalties Reputational impacts | Major | Almost certain | 23 - Very High | <ul style="list-style-type: none"> Site hazard analysis to include heritage items Noise and Vibration Management Plan Unexpected Heritage Find Procedure Set-up exclusion zones and defined clearing limits and no-go zones | Major | Unlikely | 14 – Moderate | SecureEnergy |
| 2 | Vegetation clearing | Biodiversity | Injury/mortality of fauna | Removal of occupied habitat, including hollow bearing trees, shrubs, nests, ground cover, rocks. | <ul style="list-style-type: none"> Impacts to fauna Reputational impacts Potential regulatory action from agencies | Moderate | Possible | 13 - Moderate | <ul style="list-style-type: none"> Biodiversity Management Plan Pre-clearing procedure Unexpected threatened species find procedure Fauna handling procedure Use of fauna spotters/handlers | Moderate | Unlikely | 12 – Moderate | Transgrid and SecureEnergy |
| 3 | Vegetation clearing | Bushfire | Ignition of bushfire. | Sparks from machinery ignites combustible vegetation and fire gets out of control. | <ul style="list-style-type: none"> Significant impact to local environment through bushfire Potential destruction of project infrastructure and equipment Potential for fatality/injury to personnel and members of the public Damage to public property and adjacent properties Loss of biodiversity Project delays Significant reputational impact Potential regulatory actions from agencies Financial penalties | Catastrophic | Likely | 24 – Very High | <ul style="list-style-type: none"> Emergency Plan FRACM Hot Works permits | Catastrophic | Unlikely | 21 – High | SecureEnergy |
| 4 | Earthworks Vegetation clearing | Biosecurity | Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines. | Vehicular movements from disturbed and contaminated areas into undisturbed areas within the project area. | <ul style="list-style-type: none"> Impact to biodiversity in exceedance of the approved Project Spread of weeds/impacts to native vegetation Long term maintenance requirements | Major | Possible | 19 – High | <ul style="list-style-type: none"> Biosecurity Management Plan Weed and seed inspections Hygiene inspections of vehicle prior to accessing site Washdown bays | Major | Unlikely | 14 – Moderate | Transgrid and SecureEnergy |
| 5 | Earthworks Vegetation clearing | Biodiversity | Removal of vegetation/habitat not permitted to be impacted by the project approval | Vegetation clearing outside of project boundary. | <ul style="list-style-type: none"> Unauthorised impact to flora Project delays Financial penalties Reputational impacts | Major | Almost certain | 23 - Very High | <ul style="list-style-type: none"> Biodiversity Management Plan Set-up exclusion zones and defined clearing limits and no-go zones Site hazard analysis Unexpected biodiversity find procedure Clearing and land disturbance Permits Clearing register | Moderate | Unlikely | 12 – Moderate | Transgrid and SecureEnergy |
| 6 | Earthworks Vegetation clearing | Surface water | Contamination of surface water. Reduction in water quality. Dispersion of contaminants | Newly exposed sediment and topsoil carried into catchments and watercourses during rainfall events. | <ul style="list-style-type: none"> Water pollution Loss of topsoil Impacts to aquatic habitat and fauna Potential regulatory action from agencies Financial penalties Reputational impacts | Major | Possible | 19 – High | <ul style="list-style-type: none"> Soil and Water Management Plan Water Quality Monitoring Erosion and Sediment Control Strategy and PESCPs Clean water diversions Discharge permit Sediment basins and water treatment | Major | Unlikely | 14 – Moderate | SecureEnergy |

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| No. | Activity | Environmental category | Impact/Risk | Aspect/Cause | Possible Outcome | Consequence | Likelihood | Initial Risk Rating | Risk Management Measures (DRAFT) | Consequence | Likelihood | Residual Risk Rating | Risk Owner |
|-----|-----------------------------------|------------------------|---|--|--|-------------|----------------|---------------------|---|-------------|------------|----------------------|----------------------------|
| 7 | Earthworks Vegetation clearing | Biodiversity | Fauna disturbance/relocation | Construction activities in fauna habitats causes fauna to relocate away from area. | <ul style="list-style-type: none"> Reduction in localised population of fauna including threatened species Adverse fauna monitoring impacts | Minor | Likely | 11 - Moderate | <ul style="list-style-type: none"> Biodiversity Management Plan Site hazard analysis Unexpected biodiversity find procedure | Minor | Possible | 10 - Moderate | Transgrid and SecureEnergy |
| 8 | Earthworks Vegetation clearing | Noise and vibration | Increased noise and vibration levels at sensitive receivers | Noise 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 impacts are more likely an issue along the access route through local towns. | <ul style="list-style-type: none"> Sleep disturbance at sensitive receiver locations Loss of support from local community | Moderate | Almost certain | 18 – High | <ul style="list-style-type: none"> Noise and Vibration Management Plan Traffic and Transport Management Plan Out of Hours Work Procedure Noise monitoring record Vibration monitoring record | Moderate | Rare | 7 – Low | SecureEnergy |
| 9 | Earthworks Vegetation clearing | Air Quality | Visible dust plumes and deposition of dust on surfaces, impacts to amenity, dust generation from exposing of topsoil and sub soil through vegetation removal. | Exposed sediment and stockpiled of fine material become airborne in strong winds and carried to other areas. | <ul style="list-style-type: none"> Excessive dust emission/deposition in surrounding environment Air quality impacts exceed the approved project levels | Moderate | Almost certain | 18 – High | <ul style="list-style-type: none"> Air Quality Management Plan Implement dust-suppression through use of water cart Rehabilitation/stabilisation of cleared areas where possible | Moderate | Unlikely | 12 – Moderate | SecureEnergy |
| 10 | Earthworks Vegetation clearing | Waste | Excess use of natural resources and energy leading to production of greenhouse gases. | Unnecessary operation/idling of vehicles, machinery and plant. | <ul style="list-style-type: none"> Excessive consumption of diesel and other resources Unnecessary production of greenhouse gases | Minor | Possible | 10 - Moderate | <ul style="list-style-type: none"> Training/instruction to on-site staff, machinery and plant operators to shut down vehicles and equipment when not in use | Minor | Rare | 5 – Low | SecureEnergy |
| 11 | Earthworks | Biodiversity | Impacts on vegetation/habitat beyond the project boundary. | Improper stockpiling of excavated material and engineered fill. | <ul style="list-style-type: none"> Unapproved impacts beyond project boundary Potential regulatory action from agencies Project delays Financial penalties Reputational impacts | Major | Possible | 19 – High | <ul style="list-style-type: none"> Biodiversity Management Plan Utilisation of allocated stockpile areas Training for all contractors | Moderate | Rare | 7 - Low | Transgrid and SecureEnergy |
| 12 | Earthworks | Landform | Loss and/or degradation of topsoils and subsoils. | Exposed sediment carried into catchments and watercourses during rainfall events due to lack of controls or inadequately installed controls. | <ul style="list-style-type: none"> Adverse water quality impacts Loss of amenity Potential regulatory action from agencies Reputational impacts | Moderate | Likely | 17 – High | <ul style="list-style-type: none"> Soil and Water Management Plan Water Quality Monitoring Erosion and Sediment Control Strategy and PESCPs Clean water diversions Process and intercepted water management Sediment basins and water treatment (as required) | Moderate | Unlikely | 12 – Moderate | SecureEnergy |

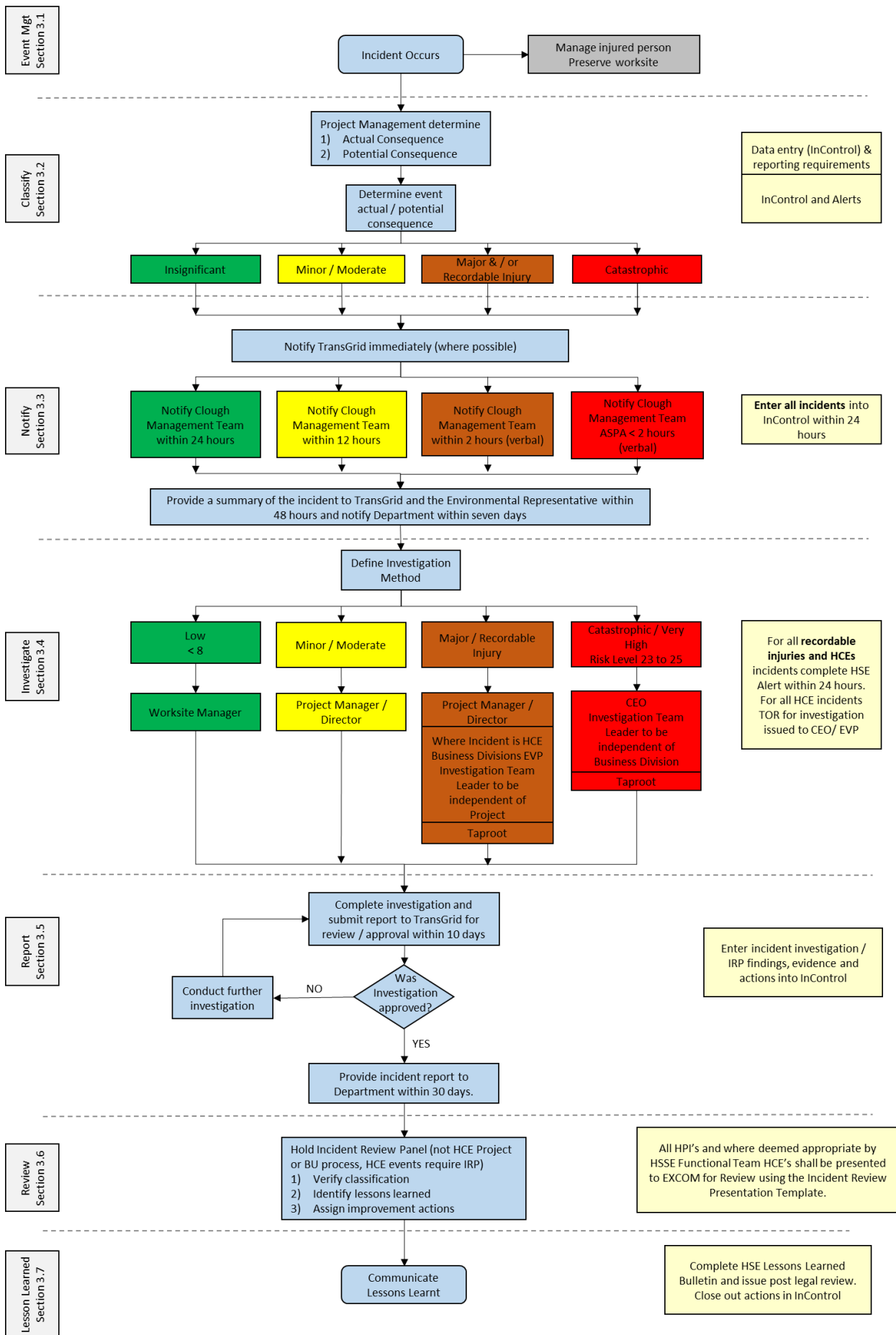
| No. | Activity | Environmental category | Impact/Risk | Aspect/Cause | Possible Outcome | Consequence | Likelihood | Initial Risk Rating | Risk Management Measures (DRAFT) | Consequence | Likelihood | Residual Risk Rating | Risk Owner |
|-----|---|------------------------|--|---|---|-------------|------------|---------------------|--|-------------|------------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

| No. | Activity | Environmental category | Impact/Risk | Aspect/Cause | Possible Outcome | Consequence | Likelihood | Initial Risk Rating | Risk Management Measures (DRAFT) | Consequence | Likelihood | Residual Risk Rating | Risk Owner |
|-----|--|------------------------|--|--|---|-------------|------------|---------------------|--|-------------|------------|----------------------|--------------|
| 20 | Stockpile/ spoil emplacement | Surface Water | Erosion and sedimentation. Contamination of surface water. Reduction in water quality. Dispersion of contaminants. | Runoff from spoil stockpiles causes contaminated/polluted stormwater discharge into watercourses due to lack of controls or inadequately installed controls. | <ul style="list-style-type: none"> Adverse water quality impacts Loss of amenity Potential regulatory action from agencies Reputational impacts | Major | Possible | 19 – High | <ul style="list-style-type: none"> Soil and Water Management Plan Erosion and Sediment Control Strategy and PESCPs | Major | Unlikely | 14 – Moderate | SecureEnergy |
| 21 | Storage of hazardous materials | Surface water | Contamination of surface water. Reduction in water quality. Dispersion of contaminants. | Spill of stored hazardous material escaping containment into waterways. | <ul style="list-style-type: none"> Hydrocarbon pollution Potential regulatory action from agencies Financial penalties Reputational impacts | Major | Possible | 19 – High | <ul style="list-style-type: none"> Soil and Water Management Plan Bunded areas for storage of fuels and oils | Major | Unlikely | 14 – Moderate | SecureEnergy |
| 22 | Storage of hazardous materials | Groundwater | Contamination of groundwater. | Spill or leaks of stored hazardous material dispersing into ground water. | <ul style="list-style-type: none"> Potential for irreparable damage to groundwater quality Long term impacts to groundwater dependent species or ecosystems | Major | Unlikely | 14 – Moderate | <ul style="list-style-type: none"> Soil and Water Management Plan Bunded areas for storage of fuels and oils | Moderate | Rare | 7 - Low | SecureEnergy |
| 23 | Rock crushing/ screening | Noise and vibration | Increased noise and vibration levels at sensitive receivers. | Rock crushing and screening activities situated too close to sensitive receivers. | <ul style="list-style-type: none"> Sleep disturbance at sensitive receiver locations Loss of support from local community | Moderate | Unlikely | 12 – Moderate | <ul style="list-style-type: none"> Noise and Vibration Management Plan Management of operational hours and intensity level | Moderate | Rare | 7 - Low | SecureEnergy |
| 24 | Rock crushing/ screening | Air Quality | Increased dust emissions. | Rock crushing and screening activities not implementing adequate dust suppression mitigation. | <ul style="list-style-type: none"> Excessive dust emission/deposition in surrounding environment Air quality impacts exceed the approved project levels Adverse biodiversity impacts | Major | Possible | 19 – High | <ul style="list-style-type: none"> Air Quality Management Plan Weather monitoring prior to operation Use of covers and water spray | Minor | Unlikely | 6 – Low | SecureEnergy |
| 25 | Storage/ disposal of hazardous materials | Waste | Contamination of soil and water, unlawful disposal of waste. | Inadequate storage of hazardous materials, inadequate spill management practices, improper disposal practices. | <ul style="list-style-type: none"> Contamination of soil and water in sensitive environment Potential regulatory action from agencies Financial penalties Loss of community support Reputational impacts | Major | Possible | 19 – High | <ul style="list-style-type: none"> Waste Management Plan Use of licensed disposal contractors Appropriate bunded storage of hazardous materials | Major | Unlikely | 14 – Moderate | SecureEnergy |
| 26 | Operation of accommodation camp | Waste | Excess use of natural resources and energy. | Inefficient use of resources within the accommodation camp. | <ul style="list-style-type: none"> Excessive use of resources such as water and electricity | Minor | Likely | 11 - Moderate | <ul style="list-style-type: none"> Energy efficient design of site facilities | Minor | Unlikely | 6 – Low | SecureEnergy |
| 27 | Operation of accommodation camp | Waste | Odour impacts, contamination of soil and water in sensitive environment, excess waste sent to landfill. | Inadequate management of camp waste including sewerage and mixed waste. | <ul style="list-style-type: none"> Unlawful disposal of waste Excess waste generation Contamination of waste streams Contamination of soil and water Potential regulatory action from agencies | Moderate | Possible | 13 - Moderate | <ul style="list-style-type: none"> Waste Management Plan Use of licensed waste disposal contractors Waste tracking and register of waste disposal | Major | Unlikely | 14 – Moderate | SecureEnergy |
| 28 | Operation of accommodation camp | Surface water | Contamination of surface water. Reduction in water quality. Dispersion of contaminants. | Leak from the wastewater treatment plant into the receiving environment | <ul style="list-style-type: none"> Environmental contamination Potential regulatory action from agencies Financial penalties Reputational impacts | Moderate | Likely | 17 – High | <ul style="list-style-type: none"> Soil and Water Management Plan Wastewater treatment plant to be self-bunded | Minor | Unlikely | 6 – Low | SecureEnergy |

| No. | Activity | Environmental category | Impact/Risk | Aspect/Cause | Possible Outcome | Consequence | Likelihood | Initial Risk Rating | Risk Management Measures (DRAFT) | Consequence | Likelihood | Residual Risk Rating | Risk Owner |
|-----|-----------------------------------|------------------------|---|--|--|--------------|------------|---------------------|--|--------------|------------|----------------------|--------------|
| 29 | Hot works and plant operations | Bushfire | Ignition of bushfire. | Sparks from machinery or hot work activities ignites combustible vegetation and fire gets out of control. | <ul style="list-style-type: none"> Significant impact to local environment through bushfire Potential destruction of project infrastructure and equipment Potential for fatality/injury to personnel and members of the public Damage to public property and adjacent properties Loss of biodiversity Project delays Significant reputational impact Potential regulatory actions from agencies Financial penalties | Catastrophic | Likely | 24 – Very High | <ul style="list-style-type: none"> Emergency Plan FRACM Hot Works Permits | Catastrophic | Unlikely | 15 – Moderate | SecureEnergy |
| 30 | Inflow of workforce to local area | Socio economic | Business impacts, increased housing demand. | Workforce size relocating to local area. | <ul style="list-style-type: none"> Housing rental/purchase prices increase due to increased demand Local services struggle to meet demands Loss of community support for the project | Minor | Possible | 10 - Moderate | <ul style="list-style-type: none"> Establishment of construction camps to provide accommodation for workforce Encourage personnel to purchase local produce and use local business to stimulate positive economic growth in the locality | Minor | Unlikely | 6 – Low | SecureEnergy |
| 31 | Working in bushfire prone areas | Bushfire | Ignition of bushfire. | Siting of temporary infrastructure and personnel in bushfire prone areas without appropriate bushfire mitigation in place. | <ul style="list-style-type: none"> Damage to construction site, works and accommodation camps Project delays Safety impacts | Moderate | Possible | 13 - Moderate | <ul style="list-style-type: none"> Pre-position firefighting equipment Safety and emergency systems and procedures | Minor | Unlikely | 6 – Low | SecureEnergy |

Appendix A4 – Incident, Notification and Investigation Procedure Flowchart

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Appendix B – Environmental Management Plans

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