

# Appendix B9

## Other Management Measures

The Northern Road Upgrade –  
Mersey Road, Bringelly to Glenmore Parkway, Glenmore Park

September 2018

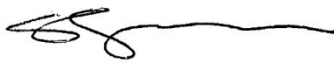


## Document control

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## Approval and authorisation

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## Revision history

Revision	Date	Description
0	08/06/2018	Draft for consultation
1	07/09/2018	Updated in response to DP&E comments Issued to DP&E for information

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# Glossary / Abbreviations

Term	Expanded text
AFMP	Ancillary Facilities Management Plan
CCS	Community Communication Strategy
CEMP	Construction Environmental Management Plan
CMS	Complaints Management System
CoA	Condition of approval
CFFMP	Construction Flora and Fauna Management Plan
CMS	Complaints Management System
CSSI	Critical State Significant Infrastructure
CSWMP	Construction Soil and Water Management Plan
CTMP	Construction Traffic Management Plan
CWEMP	Construction Waste and Energy Management Plan
DoEE	Commonwealth Department of the Environment and Energy
DoI	Department of Industry
DP&E	NSW Department of Planning and Environment
DPI	Department of Primary Industries
EIS	Environmental Impact Statement
EMS	Environmental Management System
Environmental aspect	Defined by AS/NZS ISO 14001:2015 as an element of an organisation's activities, products or services that can interact with the environment
Environmental impact	Defined by AS/NZS ISO 14001:2015 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects
Environmental incident	An unexpected event that has, or has the potential to, cause harm to the environment and requires some action to minimise the impact or restore the environment
Environmental objective	Defined by AS/NZS ISO 14001:2015 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve
Environmental objective	Defined by AS/NZS ISO 14001:2015 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve
Environmental policy	Statement by an organisation of its intention and principles for environmental performance
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of construction. The principal point of advice in relation to all questions and complaints concerning environmental performance
EPA	NSW Environment Protection Authority

<b>Term</b>	<b>Expanded text</b>
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
EWMS	Environmental Work Method Statements
Federal-CoA	Condition of the Federal Department of the Environment and Energy Approval Decision
NSW-CoA	Condition of the NSW DP&E Infrastructure Approval
NSW Infrastructure Approval	The Infrastructure Approval for the Northern Road Upgrade issued by the New South Wales Government on 30 May 2018
OEH	NSW Office of Environment and Heritage
OACEMP	Overarching Construction Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
Project, the	The Northern Road Upgrade – Mersey Road, Bringelly to Glenmore Parkway, Glenmore Park
REMM	Revised Environmental Management Measure as provided in the Final EIS / SPIR
Roads and Maritime, RMS	NSW Roads and Maritime Services
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the NSW Department of Planning and Environment (or delegate)
SES	State Emergency Services
SME	Small to Medium Enterprise
SPIR	Submissions and Preferred Infrastructure Report
TNR	The Northern Road
UDLP	Urban Design and Landscape Plan

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# 1 Introduction

## 1.1 Context

This document forms part of the Overarching Construction Environmental Management Plan (OACEMP) for The Northern Road Upgrade – Mersey Road, Bringelly to Glenmore Parkway, Glenmore Park (the Project).

This document has been prepared to address the requirements of:

- the NSW Minister's Infrastructure Approval dated 30 May 2018 and Federal Minister for the Environment and Energy's Approval dated 15 June 2018
- the environmental management measures listed in *The Northern Road Upgrade – Mersey Road, Bringelly to Glenmore Parkway, Glenmore Park NSW Environmental Impact Statement / Commonwealth Draft Environmental Impact Statement (EIS)* (Jacobs, 2017) as amended by *The Northern Road Upgrade – Mersey Road, Bringelly to Glenmore Parkway, Glenmore Park Submissions and Preferred Infrastructure Report (SPIR)* (Jacobs, 2017)
- Roads and Maritime specifications
- all applicable legislation.

Construction of the Project will be undertaken in three stages:

- Stage 4 - Mersey Road, Bringelly, to Eaton Road, Luddenham
- Stage 5 - Littlefields Road, Luddenham, to Glenmore Parkway, Glenmore Park
- Stage 6 - Littlefields Road, Luddenham to Eaton Road, Luddenham

An overview of the Project, including the extent of the Project stages, is shown on Figure 1-1 and Figure 1-2.

Each stage will be delivered in a separate construction package that will include all activities needed to complete the stage. Details of the proposed Project staging, including construction activities and submission of corresponding environmental plans, strategies and protocols, is documented in the Project Staging Report.

The Construction Contractors will develop stage-specific environmental management documentation to address the operational control requirements outlined in the OACEMP that apply to the stages that they are delivering. Environmental requirements are identified in the various environmental documents, including the EIS, SPIR, supplementary assessments, conditions of approval (CoAs) and Roads and Maritime documents. CoAs and revised environmental management measures (REMMs) are addressed within the sub-plans attached to the OACEMP.

This document addresses the conditions of approval (CoAs), revised environmental management measures (REMMs) and Roads and Maritime QA Specification G36 requirements that have not been captured by the OACEMP sub-plans. This document addresses CoAs, REMMs and Roads and Maritime QA Specification G36 requirements within the following areas:

- socio-economic and land use
- visual impact
- utilities and services

- hazards and risks
- cumulative impacts.

The management measures in this Appendix B9 will be updated, tailored and finalised by the Contractors. Roads and Maritime will review these management measures for compliance with the approved OACEMP.

## 1.2 Consultation

### 1.2.1 Consultation for other management measures

No consultation under the NSW Minister’s Infrastructure Approval was required for the preparation of this document.

### 1.2.2 Ongoing consultation during construction

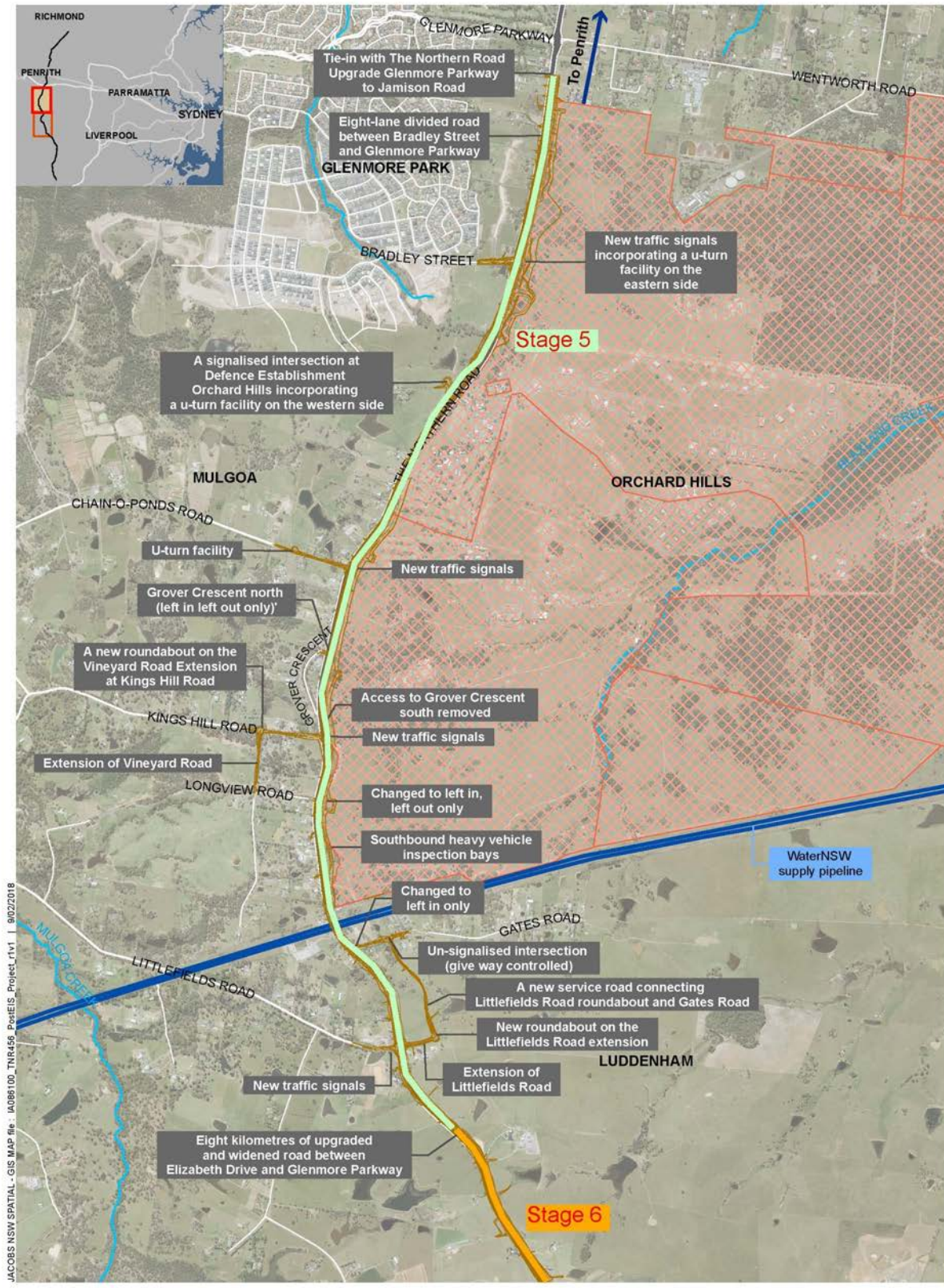
Consultation between Roads and Maritime and its Contractors, and stakeholders, the community and relevant agencies during the construction of the Project will occur as required. The process for the consultation will be documented in the Community Communication Strategy (CCS).

Specific consultation requirements under the EIS and SPIR for the other measures identified in the REMMs are provided in Table 1-1.

**Table 1-1: Consultation requirements identified in the EIS and SPIR**

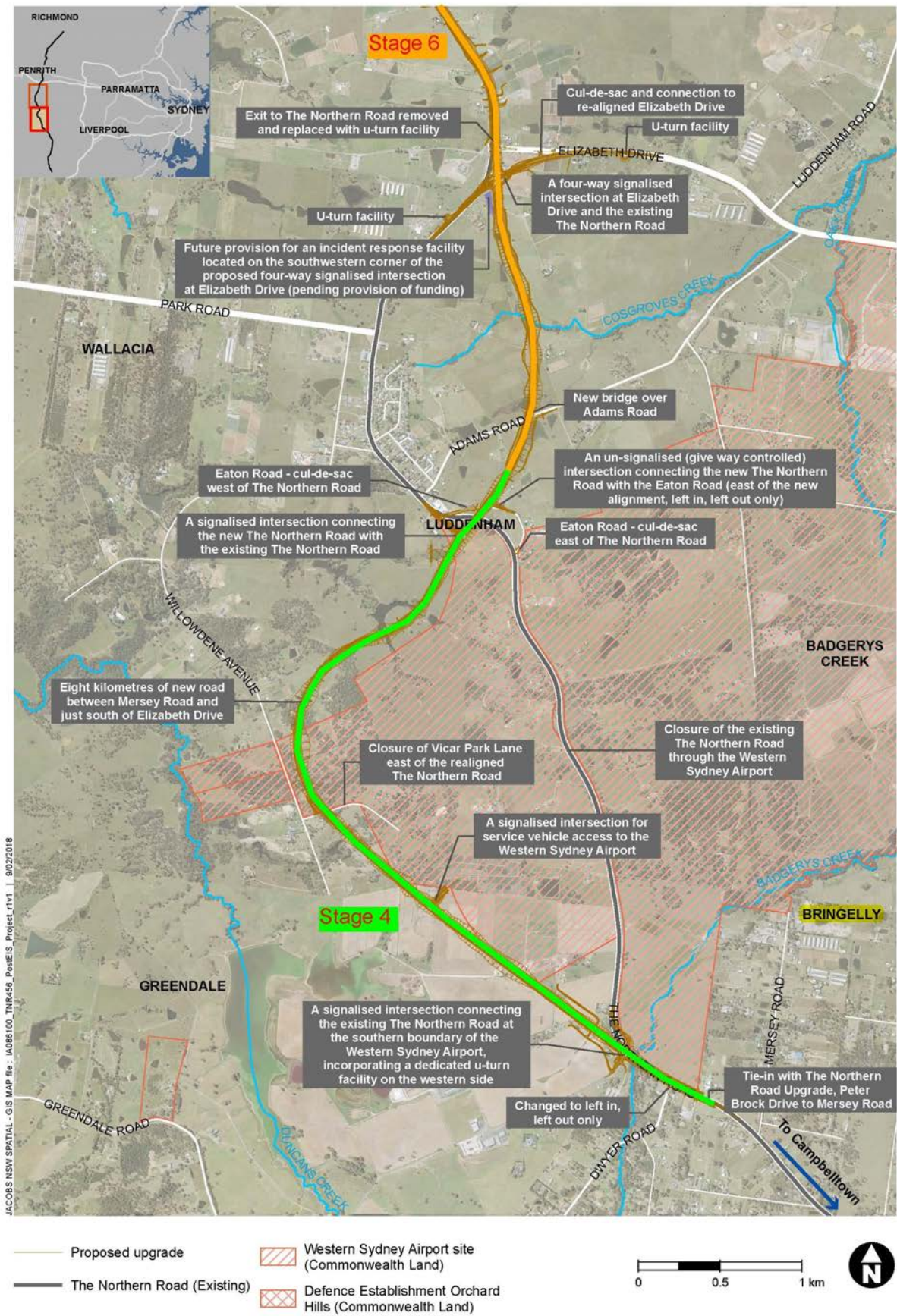
REMM	Consultation requirements identified in the EIS and SPIR
SE-7	Undertake property adjustments and relocation of infrastructure (for example, fencing, dams, property access) in consultation with the property owner.
SE-8	Undertake any adjustments to the Orchard Hills golf course, in consultation with the managers of the Orchard Hills Golf Club.
SE-9	On-going consultation with local business owners, including owners of agricultural businesses, located close to construction works about the timing, duration and likely impact of construction activities on their business operations would be carried out.
SE-10	Relocate and/or remove farm infrastructure, including farm dams, as required and in consultation with affected land owners.
SE-19	Strategies to address impacts to utilities would be developed in consultation with utility providers during detailed design and during construction of the project.
CI-1	Consultation would be undertaken with local communities potentially affected by the impacts of multiple projects in addition to the project





**Figure 1-1: Overview of the Project (northern portion)**





**Figure 1-2: Overview of the Project (southern portion)**

## **2 Environmental mitigation and management measures**

The State (NSW-CoA) and Federal (Federal-CoA) conditions of approval relevant to this document and their applicability to each stage of the Project are listed in Table 2-1. A cross reference is also included to indicate where the condition is addressed in the project management documents.

REMMs and Roads and Maritime QA Specification G36 requirements related to socio-economic and land use issues, visual impacts, utilities and services issues, hazards, risks and cumulative impacts that have not been addressed in the OACEMP sub-plans are outlined in Table 2-2 to Table 2-5, including a reference to where each REMM or Roads and Maritime QA Specification G36 requirements is addressed in the project management documents.

## 2.1 Conditions of approval

Table 2-1: Conditions of approval relating to property and landuse, and utilities and services

CoA	Condition requirement	When to implement	Responsibility	Applicability					Reference
				Stage 4		Stage 5		Stage 6	
				Cth	NSW	Cth	NSW	NSW	
<b>Property and landuse</b>									
NSW-CoA E39	The CSSI must be constructed in a manner that minimises intrusion and disruption to agricultural operations/activities in surrounding properties (e.g. stock access, access to farm dams, etc.), unless otherwise agreed by the landowner.	Construction	Contractor Construction Manager	✓	✓	✓	✓	✓	Contractor's CEMP
NSW-CoA E42	Prior to commencement of any works, a suitably qualified person must undertake building and structure condition surveys of all buildings and structures identified in the documents listed in <b>Condition A1</b> as being at risk of damage. The results of the surveys must be documented in a <b>Building Condition Survey Report</b> for each building and structure surveyed. Copies of <b>Building Condition Survey Reports</b> must be provided to the landowners of the buildings and structures surveyed and, if agreed by the landowner, the relevant Council within three weeks of completing the surveys, and no later than one month prior to the commencement of works.	Pre-construction	Contractor Construction Manager	✓	✓	✓	✓	✓	Contractor's CEMP

CoA	Condition requirement	When to implement	Responsibility	Applicability			Reference		
				Stage 4 Cth NSW	Stage 5 Cth NSW	Stage 6 NSW			
NSW-CoA E43	After completion of the works, condition surveys of all buildings and structures for which pre-Construction condition surveys were undertaken in accordance with <b>Condition E42</b> of this approval must be undertaken by a suitably qualified person. The results of the surveys must be documented in a <b>Building Condition Survey Report</b> for each building surveyed. Copies of <b>Building Condition Survey Reports</b> must be provided to the landowners of the buildings surveyed and, if agreed by the landowner, the relevant Council within three weeks of completing the surveys, and no later than three (3) months following the completion of works.	Post-construction	Contractor Construction Manager	✓	✓	✓	✓	✓	Contractor's CEMP
NSW-CoA E44	Any damage caused to property as a result of the CSSI must be rectified or the landowner compensated, within a reasonable timeframe, with the costs borne by the Proponent.  Note: This condition is not intended to limit any claims that the landowner may have against the Proponent.	Post-construction	Contractor Construction Manager	✓	✓	✓	✓	✓	Contractor's CEMP
<b>Utilities and services</b>									
NSW-CoA E66	Utilities, services and other infrastructure potentially adversely affected by the delivery of the CSSI must be identified before works affecting them commence, to determine the requirements for access to, diversion protection, and/or support of such services.	Pre-Construction Construction	Contractor Utility Works Coordinator	✓	✓	✓	✓	✓	Contractor's Utility Management Plan

CoA	Condition requirement	When to implement	Responsibility	Applicability					Reference
				Stage 4		Stage 5		Stage 6	
				Cth	NSW	Cth	NSW	NSW	
NSW-CoA E66 (ctd)	The relevant owner and/or provider of services must be consulted to make suitable arrangements for access to diversion, protection, and/or support of the affected infrastructure as required.	Pre-construction Construction	Contractor's Utility Works Coordinator / Contractor Community Relations Manager	✓	✓	✓	✓	✓	Contractor's Utility Management Plan
	The Proponent must ensure that disruption to any service is minimised and be responsible for advising local residents and businesses affected before any planned disruption of service occurs.	Construction	Contractor's Utility Works Coordinator / Contractor Community Relations Manager	✓	✓	✓	✓	✓	Contractor's Utility Management Plan



## 2.2 Revised environmental management measures

Table 2-2: Socio-economic REMMs

ID	Measure / requirement	When to implement	Responsibility	Applicability			Reference	
				Stage 4 Cth	NSW	Stage 5 Cth		NSW
<b>General socio-economic impacts</b>								
SE-1	<p>A Draft Community Involvement Plan would be prepared to guide community engagement during construction of the project and would be updated throughout construction. Communication would be with the local community, stakeholders and the wider region.</p> <p>The Draft Community Involvement Plan includes:</p> <ul style="list-style-type: none"> <li>Guiding principles overall approach to community and stakeholder involvement</li> <li>A comprehensive list of identified stakeholders</li> <li>A register of specific issue communications strategies</li> <li>Requirements for the project regarding access to information, complaints and inquiries procedures and community consultation</li> <li>A range of communication tools applicable to the project</li> <li>Contact names and details</li> <li>Complaints procedures.</li> </ul>	Construction	<p>Roads and Maritime Community and Stakeholder Engagement Advisor</p> <p>Contractor Community Relations Manager</p>	✓	✓	✓	✓	<p>Community Communication Strategy (CCS)</p> <p>Section 3.2</p> <p>Section 3.3</p>

ID	Measure / requirement	When to implement	Responsibility	Applicability			Reference		
				Stage 4 Cth	NSW	Stage 5 Cth		NSW	Stage 6 NSW
<b>Property acquisition</b>									
SE-7	Undertake property adjustments and relocation of infrastructure (for example, fencing, dams, property access) in consultation with the property owner.	Pre-construction Construction	Roads and Maritime Project Manager / Contractor Construction Manager/ Contractor Community Relations Manager	✓	✓	✓	✓	✓	Contractor's CEMP Approved Property Adjustment Plan
SE-8	Undertake any adjustments to the Orchard Hills golf course, in consultation with the managers of the Orchard Hills Golf Club.	Pre-construction Construction	Roads and Maritime Project Manager / Contractor Construction Manager/ Contractor Community Relations Manager			✓	✓		Contractor's CEMP Approved Property Adjustment Plan
<b>Business and economic activity</b>									
SE-9	On-going consultation with local business owners, including owners of agricultural businesses, located close to construction works about the timing, duration and likely impact of construction activities on their business operations would be carried out.	Construction	Contractor Community Relations Manager	✓	✓	✓	✓	✓	CCS Section 3.2 Section 3.3



ID	Measure / requirement	When to implement	Responsibility	Applicability						Reference
				Stage 4		Stage 5		Stage 6		
				Cth	NSW	Cth	NSW	NSW		
SE-10	Relocate and/or remove farm infrastructure, including farm dams, as required and in consultation with affected land owners.	Construction	Contractor Construction Manager / Contractor Community Relations Manager	✓	✓	✓	✓	✓	CCS Section 3.2 Section 3.3	
SE-11	Maintain a business impact risk register to identify and manage the specific impacts associated with construction related works for individual businesses.	Construction	Contractor Construction Manager / Contractor Community Relations Manager	✓	✓	✓	✓	✓	CCS Contractor's business impact risk register	
<b>Impacts to utilities</b>										
SE-19	Strategies to address impacts to utilities would be developed in consultation with utility providers during detailed design and during construction of the project.	Detailed design Pre-construction, Construction	Contractor's Utility Works Coordinator / Contractor Community Relations Manager	✓	✓	✓	✓	✓	Contractor's CEMP CCS	

**Table 2-3: Lighting and visual impact REMMs**

ID	Measure / requirement	When to implement	Responsibility	Applicability						Reference
				Stage 4		Stage 5		Stage 6		
				Cth	NSW	Cth	NSW	NSW		
<b>Lighting impacts</b>										
UD-2	The design of temporary lighting must avoid unnecessary light spill on adjacent residents or sensitive receivers and be designed in accordance with AS 1158.1-1986.	Construction	Contractor Foreman / Contractor Site Engineer	✓	✓	✓	✓	✓	Contractor's CEMP Contractor's Ancillary Facilities Management Plan (AFMP)	
<b>Visual impacts from construction sites</b>										
UD-3	Consider the provision of barriers to screen views from visually sensitive nearby areas such as rural dwellings, residential and recreational areas.	Construction	Contractor Foreman / Contractor Site Engineer	✓	✓	✓	✓	✓	Contractor's AFMP	
UD-4	Contain construction activities within the construction works zone boundary and occupy the minimum area practicable for limiting impacts on adjoining areas, including the extent of native vegetation clearing.	Construction	Contractor Foreman / Contractor Site Engineer	✓	✓	✓	✓	✓	Contractor's CEMP Contractor's Appendix B2 - CFFMP	

ID	Measure / requirement	When to implement	Responsibility	Applicability					Reference
				Stage 4		Stage 5		Stage 6	
				Cth	NSW	Cth	NSW	NSW	
<b>Visual impacts as a result of vegetation loss</b>									
UD-5	Construction programming must show how progressive rehabilitation of disturbed areas would be undertaken to minimise the duration and extent of temporary visual and landscape character impacts and to minimise soils exposure and the potential for erosion and dust generation.	Construction	Contractor Construction Manager	✓	✓	✓	✓	✓	Contractor's Construction Program Contractor's Appendix B2 - CFFMP
UD-6	Existing trees to be retained within construction areas are to be identified, protected and maintained in accordance with AS4970 Trees on Development Sites, or as otherwise directed by a qualified ecologist or arborist.	Construction	Contractor Construction Manager	✓	✓	✓	✓	✓	Contractor's Appendix B2 - CFFMP

**Table 2-4: Hazard and risk REMMS and G36 requirements**

ID	Measure / requirement	When to implement	Responsibility	Applicability			Reference	
				Stage 4 Cth NSW	Stage 5 Cth NSW	Stage 6 NSW		
<b>General hazards and risks</b>								
HR-1	<p>Hazard and risk management planning would be incorporated throughout the CEMP, which may include items such as:</p> <ul style="list-style-type: none"> <li>• Details of the hazards and risks associated with construction activities</li> <li>• Risk management measures, including those identified in Chapters 7 and 8 of this EIS</li> <li>• Procedures to comply with all legislative and industry standard requirements</li> <li>• Contingency and emergency response plans, as required</li> <li>• Site-specific Work, Health and Safety plans and activity specific Safe Work Method Statements</li> </ul> <p>Training for all personnel (including subcontractors) in site inductions, including the recognition and awareness of site hazards and the locations of relevant equipment to protect themselves and manage any spills.</p>	Construction	Contractor Construction Manager / Contractor Foreman / Contractor Superintendent	✓	✓	✓	✓	<p>OACEMP Sections 4.2, 4.3.1, 5.3, 5.6</p> <p>Appendices A1, A2 and A7</p> <p>Appendices B1 – B10</p> <p>Contractor's PIRMP (Appendix B4 - CSWMP)</p>
<b>Fire Safety</b>								
HR-7	<p>Measures to mitigate and manage bushfire would be developed and included as part of site-specific hazard and risk management measures within the CEMP.</p> <p>The road is to be designed with consideration to the requirements of the <i>Planning for Bush Fire Protection 2006</i>.</p>	Construction	Contractor Foreman / Contractor Superintendent	✓	✓	✓	✓	Contractor's CEMP

ID	Measure / requirement	When to implement	Responsibility	Applicability			Reference	
				Stage 4 Cth NSW	Stage 5 Cth NSW	Stage 6 NSW		
G36 4.5	<p>The requirements of the <i>Rural Fires Act 1997</i> (NSW), and the <i>Local Government Act 1993</i> (NSW) and the NSW Rural Fire Service publication "Equipment &amp; Machinery Use in Bushfire Prone Areas", which is available at: <a href="http://www.smartersafety.com.au/media/0240_SafetyAlert-Equipment_and_machinery_use_in_bushfire_prone_areas.pdf">http://www.smartersafety.com.au/media/0240_SafetyAlert-Equipment_and_machinery_use_in_bushfire_prone_areas.pdf</a> will be complied with.</p> <p>Fire fighting equipment will be provided as required for the safety of persons and property.</p> <p>All items of plant used during proclaimed high fire danger periods that could discharge sparks will be fitted with spark arresters.</p> <p>Cutting, welding, grinding or other activities likely to generate fires in the open on days will not be undertaken when a total fire ban is proclaimed.</p> <p>Training will be provided to all personnel in fire prevention, fire safety and basic fire fighting skills where there is a risk of fire being caused by work such as welding, thermal or oxygen cutting, heating or other fire producing or spark producing operations or when burning off is proposed. All personnel and vehicles involved in such activities will be provided with fire fighting equipment.</p> <p>Stage specific measures to mitigate and manage bushfire risks will be provided in the Contractor's CEMP.</p> <p>There will be no disposal of cleared and grubbed vegetation by burning off.</p>	Construction	Contractor Foreman / Contractor Superintendent	✓	✓	✓	✓	Contractor's CEMP

ID	Measure / requirement	When to implement	Responsibility	Applicability			Reference	
				Stage 4 Cth	NSW	Stage 5 Cth		NSW
<b>Warragamba Pipelines</b>								
HR-8	Roads and Maritime would notify WaterNSW of any incident such as vehicle accident, discovery of any heritage items, spill or fire that affects or could affect the Warragamba Pipelines including the corridor.	Construction	Contractor Construction Manager to notify Roads and Maritime  Roads and Maritime Environmental Manager (or delegate) / Roads and Maritime Project Manager to notify WaterNSW	✓	✓	✓	✓	OACEMP Contacts List  OACEMP Section 5.6 and Table 5-1 Incident Notification and Reporting  Contractor's PIRMP

**Table 2-5: Cumulative impacts REMMs**

ID	Measure / requirement	When to implement	Responsibility	Applicability					Reference
				Stage 4		Stage 5		Stage 6	
				Cth	NSW	Cth	NSW	NSW	
CI-1	Consultation would be undertaken with local communities potentially affected by the impacts of multiple projects in addition to the project	Construction	Roads and Maritime Community and Stakeholder Engagement Advisor/  Contractor Community Relations Manager	✓	✓	✓	✓	✓	CCS OACEMP Section 5.5

## **3 Compliance management**

### **3.1 Roles and responsibilities**

The Project organisational structure and overall roles and environmental responsibilities are outlined in Section 5.1 of the OACEMP. Specific responsibilities for the implementation of environmental management measures are detailed in Sections 2.1 and 2.2.

The Contractor's Utility Works Coordinator is responsible for planning and scheduling the Contractor's utility adjustment work, including any temporary utility adjustments that may be required to accord with the construction/traffic staging. The program will allow for any construction times required by the utility owner, including lead times required for design review and approvals, procurement and delivery of components, shutdown notification periods, scheduled cutover periods, etc.

### **3.2 Communication**

Roads and Maritime will prepare and implement a CCS in accordance with the requirements of NSW-CoA B1 to document the approach to stakeholder and community communications for the Project. The CCS will identify opportunities and tools for providing information and consulting with the community and stakeholders during the construction of the Project. Contractors will support the delivery of the CCS.

All site personnel will participate in induction training that will include community involvement obligations.

Further detail about the CCS is provided in Section 5.5.3 of the OACEMP.

#### **3.2.1 Communication with Utility Owners**

The Contractor's Utility Works Coordinator is responsible for organising start-up meetings with each utility owner to confirm their requirements and obtaining their concurrence to the utility adjustment works, and to coordinate the utility adjustment works, including those carried out directly by the utility owner, with the other Project works.

The Contractor's Utility Works Coordinator will provide Roads and Maritime with the proposed agenda (detailed and utility owner specific) for the start-up meetings with each utility owner and the dates when those meetings are scheduled at least five days before each meeting is scheduled to be held.

The Contractor's Utility Works Coordinator will convene and attend regular meetings (at least fortnightly unless approved otherwise by Roads and Maritime) with each utility owner to coordinate and assess the progress of the work. The Contractor's Utility Works Coordinator will invite the Roads and Maritime Project Manager (or delegate) to the meetings. The meetings will be held at locations determined by each utility owner. The Contractor's Utility Works Coordinator will record the minutes of these meetings and distribute them to all attendees and the Roads and Maritime Project Manager within three working days after the meeting.



### **3.3 Complaints management**

Roads and Maritime will develop a Complaints Management System (CMS) to document the overall approach to complaints management for the Project. The Contractors will adopt the requirements of the CMS, including reporting requirements. The CMS will include a Complaints Register which will record the details of all complaints relating to the Project.

Further detail about the CMS is provided in Section 5.5.3 of the OACEMP.

### **3.4 Training**

Details regarding staff induction and training are outlined in Section 5.3 of the OACEMP. Information about training for specific environmental issues is provided in the OACEMP sub-plans.

### **3.5 Monitoring and inspections**

Requirements and responsibilities in relation to monitoring and inspections, additional to those identified in Section 2 of this document, are documented in Section 7.1 and Section 7.2 of the OACEMP. Information about monitoring and inspections for specific environmental issues is provided in the OACEMP sub-plans.

### **3.6 Auditing**

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental management measures, compliance with these measures, conditions of approval and other relevant approvals, licenses and guidelines.

Audit requirements are detailed in Section 6.4 of the OACEMP.

### **3.7 Non-conformances**

A non-conformance is the failure or refusal to comply with the requirements of project system documentation. Any member of the Contractors' Project team may raise a non-conformance or improvement opportunity.

Where a non-conformance is detected, the process described in Section 6.6 of the OACEMP will be implemented. The Contractor's Quality Plan will describe the process for managing non-conforming work practices and initiating corrective/preventative actions or system improvements in accordance with the process outlined in Section 6.6.1 of the OACEMP.

### **3.8 Reporting**

Reporting requirements and responsibilities are documented in Section 6.5 of the OACEMP. Information about reporting for specific environmental issues is provided in the OACEMP sub-plans.

The Contractors will be required to maintain accurate records substantiating all construction activities associated with the Project or relevant to the conditions of approval, including measures taken to implement REMMS identified in this document. Records must be made available to the DP&E and DoEE upon request, within the timeframe nominated in the request.

## **4 Review and improvement**

### **4.1 Continuous improvement**

Continuous improvement will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets. The continuous improvement process will be designed to:

- identify areas of opportunity for improvement of environmental management and performance
- identify environmental risks not already included in the risk register
- determine the cause or causes of non-conformances and deficiencies
- develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies
- verify the effectiveness of the corrective and preventative actions
- document any changes in procedures resulting from process improvement
- make comparisons with objectives and targets.

The Contractors will be responsible for ensuring Project environmental risks are identified and included in the risk register and appropriate mitigation measures implemented throughout the Construction of the Project as part of the continuous improvement process. The process for ongoing risk identification and management during Construction is outlined in Section 4.3.2 of the OACEMP.

### **4.2 Update and amendment**

The processes described in Section 6.8 of the OACEMP may result in the need to update or revise this document. This will occur as needed.

Any revisions to this document will be in accordance with the process outlined in Section 1.6 and 6.8 of the OACEMP.

A copy of the updated document and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure (refer to Section 1.5 of the OACEMP).

