



ENVIRONMENTAL MANAGEMENT PLAN

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SELL AND PARKER DARWIN YARD

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1 INTRODUCTION

The purpose of this Environmental Management Plan (EMP) is to provide the necessary framework to enable all site work to be conducted efficiently and with minimal environmental impact in accordance with the environmental objectives for Sell and Parker.

It is the policy of Sell and Parker to ensure that the organisation achieves a high standard of care to minimise the impact on the environment, our immediate work sites, and the local community.

To meet these objectives, a systematic and planned approach for the management of environmental issues will be implemented on every project.

This EMP is designed to provide the management with strategies to effectively manage all significant environmental risks on all our worksites. The intention of the plan is to ensure that all activities that have a potential to impact the environment have been identified and assessed and that control measures have been put in place that comply with the expectation of the Environmental Protection Authority.

This EMP has been written utilising the Sell and Parker Management System, and recognises the responsibilities to meet the relevant statutory specifications, standards and client requirements.

This EMP and associated Procedures have been developed from:

- Sell and Parker Management System;
- Environmental Protection Act 2019;
- Work Health and Safety (National Uniform Legislation) Act 2011;
- ISO 14001:2015 Environmental management systems - Requirements with guidance for use;
- ISO 9001:2015 Quality management systems - Requirements; and
- ISO 19011:2018 Australian/New Zealand Standard Guidelines for auditing management systems

The Sell and Parker Management System is an Integrated Management System. This means that the system is designed to meet the requirements of Work Health and Safety, Environmental Management, Human Resources and Quality.

2 Policy and Commitment

Sell and Parker's aim is to achieve a high standard of care and minimise our impact on the natural environment in all activities in which we are engaged. This depends on the commitment of all personnel within the organization.

2.1 Policy

This Policy applies to all Sell and Parker and associate's entities (Sell and Parker) employees, contractors and visitors.

Sell and Parker are committed to achieving a clean and healthy environment by providing services, conducting operations and recycling material that will not cause harm to the environment.

Sell and Parker are committed to minimizing our environmental footprint in the course of our business operations.

Sell and Parker are committed to developing, implementing and maintaining an Environmental Management System (EMS) that complies with the requirements of international standard ISO 14001.

We will meet these commitments through the following objectives:

- Ensure all employees, contractors and associates have an understanding of this Policy, the EMS, Storm water Management Plan and Safe Working Procedures.
 - Ensure all operations are undertaken in an environmentally responsible manner and in accordance with the relevant environmental legislation, regulations, statutory obligations and relevant voluntary codes of practice.
 - Measure, monitor and report on environmental initiatives.
 - Regularly review our business operations to identify and implement opportunities for improvement.
 - Record, investigate and implement the appropriate corrective action for all environment incidents.
- Periodically review and revise this Policy and Safe Working Procedures to maintain their relevance.

Sell and Parker reserves the right to remove from the work site anyone who breaches these conditions. For employees any breach of this Policy will be considered serious and may result in disciplinary action, up to and including termination of employment, legal action could be taken against them and they could be exposing Sell and Parker to liability.

All Sell and Parker Managers are held accountable for ensuring this Policy is effectively implemented. Responsibility for the application of this Policy lies with all Sell and Parker employees, contractors and visitors undertaking activities on behalf of Sell and Parker and within Sell and Parker control.

Luke Parker
Director
Sell and Parker Pty Ltd

Morgan Parker
Director
Sell and Parker Pty Ltd

2.2 Commitment

Sell and Parker's commitment to the environmental aspects of all our work are:

- to conduct all works in adherence to regulations and our own policies and plans;
- to monitor potential environmental issues on a daily basis, as part of our hazard and risk management strategies;

- to ensure all our employees and subcontractors are aware of our standards and adhere to our requirements; and
- to work to achieve a zero environmental incident target.

3 PERSONNEL ROLES AND RESPONSIBILITIES and TRAINING

3.1 Responsibilities

At various levels with the organization, certain positions hold important responsibilities for general environmental activities.

- | | | |
|--|---|--|
| Directors | - | Establish overall direction |
| Senior Management Team | - | Develop environmental policy |
| | - | Develop environmental objectives, targets and programs |
| | - | Review the operation of the environmental management system |
| Area Manager | - | Monitor overall environmental management system performance |
| | - | Assure compliance with applicable legal requirements and other requirements to which the organization subscribes |
| | - | Promote continual improvement |
| Site Manager | - | Understand customers and community expectations |
| | - | Total management of all operations, employees and subcontractors; |
| | - | Ensure compliance with all environmental requirements outlined in the EMP; |
| | - | Liaison with stakeholders in relation to environmental matters; |
| | - | Ensure that all environmental protection equipment is provided and maintained; |
| | - | Review environmental reports and inspections and initiate actions to rectify; |
| Environment Manager | - | Conduct baseline environmental investigations; |
| | - | Develop and Maintain Environmental Management Plan (EMP); |
| | - | Provide on-site advice in relation to the management of environmental issues; |
| | - | Conduct environmental incident investigations; |
| | - | Prepare environmental monitoring reports as required. |
| All employees (including contractors) | - | Conform to environmental management system requirements |

All persons on a work site have a responsibility for ensuring the environment isn't compromised and to manage and report any environmental issues.

3.2 Training

Management will ensure that all Sell and Parker personnel will have the necessary knowledge, awareness and skills to fulfill their environmental responsibilities. This will be done through Sell and Parker inductions, and any required specific awareness training, or during team meetings.

4 PROTECTION OF THE ENVIRONMENT

4.1 Definitions

- ALARP: Mitigate risk “As Low As Reasonably Practical”
- ‘Environment’ means all components of the earth, including:
 - land, air and water;
 - any layer of the atmosphere;
 - flora and fauna;
 - any organic or inorganic matter
 - and any living organism including humans;
 - human made or modified structures and areas;
 - the aesthetic characteristics of the components of the earth, including appearance, sound, odour, taste and texture; and
 - ecosystems with any combination of the above.
- ‘Environmental Aspect’ means the interaction, relationship or impact of an operation or activity with the Environment including, for example:
 - impacts of operations or activities on items of heritage or endangered species; and
 - operations or activities causing Pollution or Contamination.
- ‘Environmental Law’ means any statute or common law:
 - relating to the storage, handling or transportation of waste, dangerous goods or hazardous material
 - relating to occupational health and safety; or which has as one of its purposes or effects the protection of the Environment.
- ‘Environmental Notice’ means any direction, order, demand, license or other requirement from a Government Agency to take any action or refrain from taking any action in respect of the Site or the Works in connection with any Environmental Law.
- ‘Site’ means a site or work area where Sell and Parker is conducting activities on behalf of a client, or a Sell and Parker controlled and operated site.

4.2 Environmental obligations

Sell and Parker will:

- comply with all Environmental Laws including obtaining all necessary permits, authorisations, license and approvals required by any government agency for the lawful use of the site and the carrying out of work;
- not contaminate or cause any pollution on or from the site or work conducted;

-
- not use, keep or handle on the site any dangerous goods or hazardous material except as may be required to carry out general work; and that which we have EPA approval for;
 - not generate or dispose of any hazardous waste on the site;
 - operate in a proper and efficient manner and maintain in good working order:
 - all industrial plant and equipment used in connection with carrying out works; and
 - all pollution control equipment required by an Environmental Law to be installed and operated in connection with work conducted on the site.
 - provide to any regulatory body on demand any information held or controlled by Sell and Parker relating to any:
 - contamination; or
 - Environmental Aspect, affecting the site at any time.
 - allow a regulatory body access to the site to carry out environmental audits, assessments and investigations of the site and provide all information about the Environmental Aspects of the activities carried out on the site as may be reasonably requested;
 - promptly comply with any direction from a regulatory body to implement any recommendation of an environmental audit, assessment, investigation or report in respect of the site and/or any business conducted from the site (whether or not such recommendation is required in order to comply with an Environmental Law);
 - promptly notify the regulatory body in the event that:
 - it becomes aware, or as soon as a complaint is made, of a breach or alleged breach of an Environmental Law in respect of the site and/or any activity carried out on the site;
 - the site becomes contaminated in any way;
 - any pollution is emitted or discharged on or from the site;
 - we are in breach of any obligations under the approval to occupy the site.
 - do whatever is necessary or desirable and as may be required by a regulatory body.
 - remediate any contamination of the site;
 - clean up, manage or abate any pollution occurring on and/or from the site;
 - remedy any breach of an Environmental Law that occurs on or affects the site as soon as it occurs (including by restoring the site to a state as close as practicable to the state it was in prior to that breach);
 - comply with every Environmental Notice relating to the site or issued in consequence of any site work;
 - remedy any breach of this document.

Measures proposed to reduce the adverse impact of our activities on the environment are:

- Ensure all services are connected in the correct manner to site accommodation, toilets and storage compounds and that rubbish disposal bins are available;
- Vehicle access is to be restricted to designated areas;
- Enclosure or delineation of the site for safety;

- Protection of existing vegetation;
- Dust control using water carts or existing infrastructure;
- Control of discharges from and within the site;
- Control erosion on the site by leveling and benching.

5 GENERAL CONSIDERATIONS

5.1 Routine Environmental Assessment

Where Sell and Parker is conducting work activities, the following assessment is conducted to determine potential environmental hazards. A comprehensive risk assessment activity is to be conducted on site.

| Description of activity | Potential Hazard | Probability | Impact |
|--|---|-------------|--------|
| Pre start check on equipment | Fuels and oils - environmental hazards | Possible | Low |
| Weed seeds being carried onto site by vehicles and equipment | Contamination and environmental damage to worksite and surrounds | Possible | Minor |
| Office, ablution, crib and store set-up | Environmental damage from waste water systems | Possible | Low |
| Light vehicle movements (on/off site) | Environmental issues such as dust, hydrocarbon leaks / spills | Unlikely | Low |
| Oil drain of drives, fluid couplings etc. | Oil spillage | Possible | Low |
| General | Noise | Unlikely | Low |
| | Uncontrolled noise impact upon people, community, environment | Possible | Low |
| | Adverse impact on community from dust | Possible | Low |
| | Uncontrolled fire and fumes impact upon people, community, environment and property | Possible | Low |
| | Management of wash down water | Possible | Low |
| | Management of waste material | Possible | Low |

5.2 Soil Conservation

All proper precautions shall be taken by Sell and Parker to prevent the erosion of soil by wind or water on land used or occupied by us, and to prevent the deposition of soil in watercourses during execution of any work. Existing soil binding vegetation and established ground surfaces shall not be disturbed unless necessary for the purpose of undertaking the works.

If our operations cause erosion hazards, we will undertake soil conservation methods in these areas when directed by the EPA. Soil conservation measures shall include, but not be limited to, stabilisation of embankment slopes by grassing or similar means to control erosion and the construction of cut-off drains or sediment traps to prevent soil deposition outside the site.

5.3 Noise Management

5.3.1 Objective

The objective of this noise management strategy is to minimise noise emissions from the work site and assist in maintaining a satisfactory noise environment.

5.3.2 Noise Criteria

Sell and Parker adheres to the Northern Territory Noise Management Framework Guideline September 2018, in order to keep noise to a minimum for employees and other parties who would be affected by any works.

5.3.3 Potential Problem Areas

The following processes have the potential to impact on the amenity of the adjacent spaces:

- Operation of heavy machinery and balers;
- Carrying out of loud activities, such as load-out of heavy material.

5.3.4 Noise Control Methods

The determination of appropriate noise control measures will be dependent on the particular activities. Noise monitoring can be undertaken to determine the effectiveness of any measures implemented. The results of monitoring can be used to devise further control measures.

The following are some available control methods, should the requirement arise.

- Acoustic Barrier
- Silencing Devices
- Material Handling
- Treatment of Specific Equipment
- Establishment of Site Practices
- Establishment of Direct Communication with affected Parties

If necessary, noise monitoring may be undertaken to determine if specific activities that occur during site works are contributing to adverse noise outcomes. The need for noise monitoring will be triggered by receipt of noise complaints and determined in consultation with nearby neighbours.

5.4 Air Emissions

Dust

Minor air quality impacts may occur through dust generated during normal operations.

Sell and Parker will at all times endeavour to minimise dust emissions and continually monitor the effectiveness of dust mitigation strategies. Dust emissions will ordinarily be generated by loading of trucks.

To mitigate dust emissions the use of water where practicable will be used when loading out, transporting and dumping scrap onto stockpile.

Internal roads and dumping areas will be watered down during dry weather to prevent dust generation. This will be managed using a water truck and or pumps and sprays.

Dust and particulate matter monitoring will be undertaken should any authority request it as a result of any complaint.

5.5 Fire Precautions

Sell and Parker shall prevent, where possible, the degradation of air quality by fires created by hot work operations. Burning of waste material is strictly forbidden.

Sell and Parker shall provide, operate and maintain adequate fire fighting equipment for the protection of:

- the works and its plant and equipment
- take all necessary measures to prevent fire during the execution of work which may damage or cause destruction by fire the vegetation and surrounding areas.

Sell and Parker shall comply with the requirements of the Local Fire Authority directions and shall ensure that all persons on the site observe these requirements.

Sell and Parker shall take notice of, and implement appropriate strategies for, any announcements by Fire Authorities, particularly the notification of days of Total Fire Ban.

5.6 Control of Surface Water Run-off

All discharges to watercourses or drains shall meet the relevant requirements of the Environmental Protection Authority.

Sell and Parker shall ensure that all water is discharged in a condition and manner so as not to cause erosion or pollution, or nuisance to other persons within or adjacent to the site.

Polluted water from any source shall not be allowed to enter any watercourse without first being settled and treated to remove the pollution. A consultative approach with the relevant authorities will be undertaken should this be necessary.

The following types of management strategies may be required:

- Regular inspection of site drainage and implementation of maintenance as needed;
- Identification of drainage channels and effective management of surface water during periods of heavy rain;
- Repairs of areas which become unstable following periods of high rainfall;
- Reducing the amount and velocity of any water flows over the site;
- Installing sediment filters or fences to trap run-off from the site;

5.7 Preservation of Flora and Fauna

Sell and Parker shall not destroy, remove or clear trees and vegetation without the prior written permission of the client or the appropriate government agency.

We shall take such measures as necessary to prevent our employees and sub-contractors from disturbing, capturing or destroying animals and birds within the site and all neighbouring areas and along the accesses to the site.

5.8 Management of Hydrocarbons

Sell and Parker shall inspect all plant and equipment to be used on the works for oil and fuel leakage before it enters the site, and shall inspect all plant and equipment at regular intervals during the period it is on the site.

Under no reasonable circumstances shall Sell and Parker allow any plant or equipment to enter any watercourse or allow it to continue operation within the watercourse if the plant or equipment is found to be leaking oil or fuel.

Entry of oil, grease or fuel into any watercourse is prohibited. Drainage from any area likely to be so contaminated shall be effectively diverted to a suitable collection point. Sell and Parker shall provide, operate and maintain adequate facilities for the collection of leaking fuels, lubricants, oils, greases and the like, and for the transportation and lawful disposal of these materials off-site.

If pollution of the soil occurs from use of plant and equipment or spillage of any contaminant, then all contaminated soil shall be removed from the site and disposed of in accordance with the requirements of the Environmental Protection Authority.

In order to minimise the risk of polluting a watercourse, all servicing and fueling of Sell and Parker plant and equipment shall be carried out at locations remote from any watercourse.

All hydrocarbons and chemicals shall be secondarily contained regardless of capacity and volume. Secondary storage facilities shall ensure 110% containment of material and prevention of pollution in the event of breach of primary containment and shall be in accordance with design specifications of Australian Standard 1940.

Service trucks and other vehicles used for the transportation of hydrocarbons and chemicals shall be fitted with appropriate spill catchment facilities to prevent drips and leaks to ground, and spill response equipment

Generators, welders, pumps or other stationary engines shall be fitted with pumps, drip trays, or placed in secondary containment facilities at all times.

Sell and Parker will ensure at least one person on each work site is trained in competency based Spill Response Techniques.

Spill clean up materials shall be readily available at each work site where hydrocarbons and chemicals are stored and/or used.

Spills inside and outside containment facilities shall be picked up immediately with appropriate clean up material. Contaminated soil shall be picked up and contained for removal to a licensed soil land farm. Contaminated clean up material shall be managed as oily waste.

Oily waste materials shall be segregated from general wastes and removed from site by a licensed operator. Receipts shall be maintained as verification of type and amount of waste oil and oily materials removed from site.

6 WASTE MANAGEMENT

Domestic and industrial waste generated on site may include timber, oils, paints and solvents, sewage and general domestic refuse.

In order to minimize any risk to the environment or the health of any personnel the Site Manager will ensure all waste removed from site is documented. Details include:

- Type of waste being removed;
- Quantity of waste being removed;
- Location of where waste is to be disposed of;
- Amount of waste recycled and destination.

Sell and Parker places a high priority on recycling waste materials and will endeavour to dispose of material at facilities in close proximity of the site, to maximize recycling. Empty oil and chemical containers such as metal or plastic drums will be returned to the supplier for reuse or recycled where possible.

6.1 Disposal Process

In effectively managing waste on site, Sell and Parker will

- provide suitable containers for storage, collection and transport of waste;
- dispose of site generated waste at approved disposal sites;
- recycle all waste material where practicable, and
- document the details of waste leaving site.

6.2 Waste and Hazardous Materials

Sell and Parker avoid as much as practicable concrete waste being received on site, and where possible have the supplier of the material remove it from our sites.

6.2.1 Concrete

Sell and Parker avoid as much as practicable concrete waste being received on site. If any material does accumulate it will be taken off-site for crushing and recycled for use as road-base.

6.2.2 Polychlorinated Biphenyls

All potentially affected items must have a certificate stating they are PCB before the item will be received on site.

6.2.3 Chlorofluorocarbons

Any CFC containing equipment will be purged and a certificate of compliance obtained from the specialist contractor.

6.2.4 Chemical Container Wastes

The contents of any drums and containers around the site will be identified, removed and disposed of. All personnel will wear suitable clothing and protection equipment where required.

6.2.5 Domestic Waste

Domestic waste generated on site will mainly consist of food scraps and rubbish from offices and lunch room. These scraps will be placed in domestic rubbish bins or skips, and recycled or disposed of by a licensed contractor.

6.2.6 Solid Waste

All solid waste shall be designated as recyclable and non recyclable waste.

Recyclable waste consists of:

- Scrap steel (ferrous and non ferrous)
- Waste oil

Non Recyclable Waste

- Concrete and brick
- Rubber
- Timber
- Rubble

This waste shall be stockpiled located around the site, collected and disposed of at an approved location.

6.2.7 Hazardous Waste

Hazardous waste may include paint and solvent containers, insulation materials, oils and cleaning chemicals.

- Hydrocarbon waste shall be collected, stored and transported offsite for recycling or disposal at an approved facility;
- Chemical waste shall be stored in accordance with the SDS for that substance and shall be disposed of in accordance with EPA and local requirements;
- Any contaminated soils shall be placed in leak-proof containers and removed from site to an authorized facility.

7 STORAGE AND USE OF HAZARDOUS MATERIALS

The use and storage of hazardous materials on site may periodically be required. Therefore it is imperative that all site personnel are aware of environmental procedures to ensure:

- Protection of the environment
- Compliance with statutory requirements
- Control risks associated with chemical hazards

- Protection of the Health and Safety of personnel

7.1 Chemical Substances on Site

Unnecessary procurement, storage and handling of hazardous materials must be managed to ensure possible environmental degradation is kept to a minimum.

The Site Manager must be consulted before any hazardous material is brought on site and a Safety Data Sheet must be provided and located on site for referencing.

Should there be a requirement for the use and storage of hazardous goods, Sell and Parker will maintain a register of Hazardous Materials .

7.2 Safety Data Sheet

A Safety Data Sheet (SDS) must be obtained for each substance brought onto the site. The SDS must be obtained from the manufacturer or supplier and be filed on site for references by site personnel.

7.3 Labelling

All containers containing hazardous substances must be clearly labelled identifying its contents. Further information is available by referencing the SDS, usually located in the site office.

Any decanted substances must be clearly labelled with the product name.

8 Risk Assessment

Risk Assessment involves the identification of hazards (potential to cause harm), the assessment of the risks posed by those hazards, the development of controls to eliminate and minimise risks and the ongoing management of the risk controls. Risk Assessment and Risk Management strategies are used consistently by Sell and Parker on both Sell and Parker operated and customer operated sites. JSA is conducted prior to the commencement of each activity. The JSA is used to identify both WHS and Environmental hazards. If a task changes significantly or a change occurs in the environment, or other hazards are identified, the JSA will be reviewed.

A copy of the JSA will be available at the workplace and the original filed in the site Office

The NT Manager is responsible for ensuring risk controls are implemented and monitored for effectiveness. The NT Manager is responsible for providing sufficient resources to ensure risk controls are implemented.

8.1 Hazard Identification and Reporting

Any persons identifying a hazard shall:

- Firstly attempt to eliminate or control the hazard as per the hierarchy of control, and then,
- Report the hazard immediately to the responsible supervisor.
- The responsible supervisor shall ensure identified hazards are promptly reported and recorded on the hazard register

All Hazards shall be actioned and signed off as completed in a timely manner.

Hazards will be reported to the supervisor as soon as possible. If the hazard can be corrected or controlled by the person/s that identify it they must do so immediately. If the hazard cannot be corrected or controlled the hazard must be isolated and other personnel protected from the hazard.

8.1.1 Take 5

Employees are encouraged to be accountable for their own and others actions, and to immediately address issues that are unsafe or have unacceptable risk. To facilitate this behaviour, Sell and Parker uses the Take 5 System where all employees carry a formatted note book to help identify a hazard or potential hazard. This requires the individual to take action and document the action taken. All employees and subcontractors operate under this system and are instructed in its use during the site induction.

All tasks will have a Take 5 carried out immediately before that task is under taken.

Take 5 is a simple hazard identification and risk assessment, undertaken immediately prior to starting the task. It is designed to ensure that personnel assess each task for risk by completing the checklist as follows:

- Think through the task – break into steps;
- Spot the hazard – “What if”;

- Assess the risk;
- Make the changes;
- Do the job safely.

Hazard Investigation

All environmental hazards and issues are to be reported as soon as practicable to the relevant supervisor.

The supervisor will investigate hazards reported immediately; the investigation findings will be detailed and reported back to the workgroup at the next opportunity (normally pre shift meeting).

The intent of Take 5 Hazard Identification is to be pro-active in identifying, evaluating and controlling hazards that may result in incidents involving injury, environmental issues or equipment damage.

Should the matter remain unresolved, it will then be addressed between the employee, their supervisor, and the Site Manager.

9 Monitoring and Reporting

Sell and Parker has a number of measurement indicators which help us to track progress on meeting policy commitments, and to achieve objectives and targets. We primarily collect and analyse data to evaluate the organization's environmental performance, and to evaluate the performance of the environmental management system.

These progress indicators are used across a range of activities such as storage and handling procedures, noise and air quality, disposal activities, and are primarily used to measure elements such as, the number of environmental incidents, the number of environmental accidents, the percentage of waste recycled, and, the number of prosecutions incurred by the company.

9.1 Methods of evaluation

We use a range of methods to evaluate our progress and compliance against the set criteria. These include processes such as

- audits;
- review of documents and/or records;
- employee and customer feedback;
- site reviews and reporting;
- direct observation.

9.2 Reporting

As a minimum on every site, the Sell and Parker site manager will:

- Establish and maintain necessary records for the recording and reporting of environmental incidents at the workplace.

- Encourage worker participation in reporting environmental incidents.
- Ensure all environmental incidents are investigated and reported in accordance with company procedures.
- Notify the relevant Authority of environmental incidents, as required.

Sell and Parker management will take responsibility to:

- Arrange environmental talks, demonstrations, posters, etc to promote environmental awareness where required and display the company's commitment.
- Investigate any environmental degradation at the workplace and promote interest in the environment and control strategies.
- Establish a daily checklist of those environmental issues considered in need of monitoring, such as; dust levels, noise levels and odour levels.