

ENVIRONMENTAL MANAGEMENT PLAN


Asbestos and other Listed Waste Collection, Transport and Storage

McMahon Services Australia NT Pty Ltd

Intract Australia Pty Ltd

41 Bishop Street Woolner NT

EPL 275

Project Version:	Name	Signed	Date
Prepared by	Anthony Morphet		04 July 2019
Reviewed by	Kris Sharpe		04 July 2019
Approved by	Mick Laidler		04 July 2019



Approvals

Project Version: V 0.0	Name	Signed	Date
Issued for Submission	Name		Date

Amendment Record Sheet

Document Revision History				
Revision Number	Date of Revision	Author	Section / Subject	Page
1				
2				
3				

This document was prepared for the sole use by McMahon Services Group and the regulatory agencies that are directly involved, the only intended beneficiaries of our work. No other party should rely on the information contained herein without the prior written consent of McMahon Services Group 2017.

Table of Contents

- 1. Introduction and Purpose..... 6**
 - 1.1. Introduction 6
 - 1.2. Purpose..... 6
 - 1.3. Scope..... 6
 - 1.4. Environmental Objectives..... 6
 - 1.5. Distribution 7
 - 1.6. Amendment..... 7
 - 1.7. Re-Issue.....7
- 2. Project Description / Scope of Works..... 8**
 - 2.1. Principal Contacts 8
 - 2.2. Location 9
- 3. Organisation & Responsibilities 11**
 - 3.1.1. Key Site Contacts..... 11
 - 3.2. Leadership and Accountabilities 11
 - 3.2.1. The NT Manager 9
 - 3.2.2. The Asbestos Manager 10
 - 3.2.3. Asbestos Supervisor.....10
 - 3.2.4. Safety Advisor 10
 - 3.2.5. Site Personnel..... 15
 - 3.3. Everyone Has Responsibility 15
- 4. Emergency Preparedness and Response 16**
 - 4.1. Emergency Contacts 18
- 5. Management Systems.....20**
 - 5.1. Compliance Requirements 20
 - 5.1.1. Legislation requirements 20
 - 5.2. Workplace Policies 20
 - 5.3. Project Safety Objectives and KPI`s 21
- 6. Risk Management.....22**
 - 6.1. The Risk Assessment Process 22
 - 6.1.1. Table A Consequence..... 22
 - 6.1.2. Table B Likelihood..... 22
 - 6.1.3. Table C Qualitative Risk Analysis Matrix Level of Risk 22
 - 6.2. Project Risk Assessment..... 23
 - 6.3. Hierarchy of Controls..... 23
 - 6.4. Reviewing Control Measures..... 18
- 7. Induction and Training..... 19**
 - 7.1. Visitors Induction 19

- 7.2. Competency for Prescribed Occupants and Activities 19
- 7.3. Site Induction Register 20
- 7.4. Change Management..... 20
- 8. Site Establishment 26**
- 8.1. Site Establishment / Working Hours 26
- 8.2. Site Security / Hoardings at the Work Site 26
- 9. Incident Reporting and Investigation..... 27**
- 9.1. Notifiable Incidents..... 22
- 10. Consultation and Communication 28**
- 10.1. Daily Pre-Start Meetings..... 28
- 10.2. Toolbox Meetings 28
- 10.3. Safe Act Observation 28
- 10.4. Site WHS Co-Ordination Meetings and Records with Other Duty Holders..... 29
- 10.5. Site Improvement Plan SIP and Opportunity for Improvement OFI..... 29
- 10.6. Weekly Reporting 24
- 10.7. Monthly Reporting 29
- 11. Job Safety Environment Analysis JSEA..... 31**
- 11.1. Review and Monitoring JSEA`s 31
- 11.2. Permit to Work System..... 31
- 12. Subcontractor Management 28**
- 12.1. Prequalification..... 28
- 12.2. WHS Participation on Site 28
- 13. Environmental Management..... 34**
- 13.1. Housekeeping 31
- 13.2. Stormwater Control 31
- 13.3. Discovery of Contaminated Materials 31
- 13.4. Soil Contamination 31
- 13.5. Environmental Table 32
- 14. Disciplinary Action..... 36**
- 14.1. Company Employee Management 36
- 14.2. Subcontractor / Labour Hire Warning Notices..... 36
- 15. Workplace Audits and Inspections 37**
- 15.1. Spot Checks..... 37
- 15.2. Visiting Manager`s Inspection 37
- 15.3. Environmental Review..... 37
- 15.4. Workplace Audits, Inspections and Meetings 37
- 15.5. Audits..... 38
- 15.6. Monitoring and Measurement of WHS Performance..... 38

Management Plan	Environmental	EMP
----------------------------	----------------------	------------

V [1.0] [MONTH] [YEAR] © WHSEQ Dept.

16. Work Health Safety Plan Checklist 39

Appendix 1 – Company Policies 40

Appendix 3 - Key Definitions..... 46

1. Introduction and Purpose

1.1. Introduction

McMahon Service Australia NT Pty Ltd (MSANT) currently has a valid Environmental Protection Licence (EPL 275) and is valid to 28 July 2019. McMahon Services Australia NT Pty Ltd has been advised that the NT EPA is upgrading the systems to online as a benefit to recipients of EPL's and the public. McMahon Services is pleased to comply with the request from the NT EPA regarding the systems upgrade.

This Environmental Management Plan EMP represents the Company's ongoing commitment to Environmental Protection. The purpose of the plan is to ensure the implementation of the Company Management System. This plan has been developed for the Collection, Transport and Storage and management of Asbestos and other Listed Waste on site at each Branch in Northern Territory in accordance with Environmental Protection Legislation.

MSANT in partnership with Intract Indigenous Contractors (Intract) occupy the same premises and both remove and store Asbestos and other Listed Waste on these premises. Both companies work together with equal qualifications and responsibilities under the new EPL.

1.2. Purpose of the EMP

This Environmental Management Plan (EMP) has been developed to;

- Establish clear roles and responsibilities,
- Re-establish the commitment of McMahon Services to the safe transport, storage and disposal of Asbestos and other Listed Wastes to and from the Bishop St premises
- Address emergency planning for preparedness and response,
- Facilitate injury prevention and incident management,
- Address training requirements to undertake works on site,
- Apply the Company's integrated management system requirements.

The EMP shall align with and support all associated documentation to provide systematic guidance to undertake the safe storage of Asbestos and other Listed Waste on site.

1.3. Scope of the EMP

This EMP is part of a suite of Management plans which provide a project road map to assist in the successful completion of the safe storage of Asbestos and other Listed Waste on site. It applies to all MSANT & Intract employees and any subcontractors that is/are approved to undertake or perform work on the premises.

1.4. Environmental Objectives

This Environment Management Plan (EMP) has been developed to;

- Establish clear roles and responsibilities,
- Address emergency planning for preparedness and response,
- Facilitate injury prevention and incident management,
- Address training requirements to undertake works on this project,
- Define the regulatory requirements pertinent to the execution of the project,
- Apply the Company's integrated management system requirements.

The EMP Management Plan shall align with and support all associated MSANT and Intract documentation to provide systematic guidance to the safe transport, storage and removal of Asbestos and other Listed Waste.

1.5. Distribution

A hard copy of this plan shall be held in the Bishop Street Main Office and made accessible to all workers. Copies of the plan shall be provided upon request or issued as the need arises.

The EPL and NT Worksafe Licence shall also be available in all vehicles that are nominated to carry and/ or transport Asbestos and other Listed Waste of any size or quantity.

1.6. Amendment

This EMP shall be reviewed on a quarterly basis, or as required when a safety non-conformance, accident / incident report, internal audit report or a legislative change indicates that amendments are required.

Amendments to this EMP shall be approved by the NT Manager prior to re-issue.

Amendments to this plan may be made:

- to correct errors or ambiguities
- to reflect new or revised company system procedures or site work procedures
- to incorporate statutory and regulation changes
- to correct any non-conformances
- if it no longer reflects the current practice of the Company
- to accommodate changes to design
- As a result of first, second or third-party audit recommendations

1.7. Re-issue

Amended copies of this plan shall be reissued to those in receipt of the previous version unless they are no longer involved with the company. Obsolete copies of the plan are required to be removed from use when a revised plan has been received.

2. Scope of Work

This plan takes into account McMahon Services/ Intract and Regulatory Authorities requirements and is primarily driven by the Company's Scope of Works

This work relates to the transport, delivery, storage and removal of Asbestos and other Listed Waste to and from the McMahon Services/ Intract Branch Compounds storage areas.

All Listed Waste shall be treated in the same fashion as Asbestos in terms of wrapping, sealing, transportation, storage and disposal at each Branch.

DARWIN:

Over the period of 28 Jan 2011 to 28 July 2019 the quantity of stored Asbestos has not exceeded 12T at any one time. Generally, the Asbestos and other Listed Waste is only stored within the Bishop St overnight and disposed the next morning at the Shoal Bay Waste Disposal Facility. This only occurs where time does not permit the disposal on the same day as pick up.

ALICE SPRINGS:

Small amounts of Bagged Asbestos material are sometimes stored in the dedicated container located at Alice Springs compound 1/ 202 Stuart Highway. Larger amounts stored and secured in hook bins are disposed of generally on the same day. Similar to the Darwin Operations, should storage on site be required, the Asbestos and other Listed Waste is disposed off the next morning at the Alice Springs Waste Disposal Facility. Quantities of tyres are not stored in Alice Springs Compound.

KATHERINE:

Katherine Operations to date have not stored any quantity of Asbestos or other Listed Waste at 33 Crawford St, however, given that the majority of MSANT and Intract work in Katherine is associated with Tindal RAAF Base, there is the potential for Asbestos and other Listed Waste to be removed and stored in the Katherine compound prior to being transported to Darwin Shoal Bay Waste Disposal Facility.

2.1. Principal Contact

Company Name:	McMahon Services Australia NT Pty Ltd
Address:	41 Bishop Street Woolner
Contact person:	Anthony Morphett
Work No:	(08) 8930 2500
Mobile No:	0447 294 790
Email:	Anthony.morphett@mcmervices.com.au
ABN:	52 109 241 885

2.2. MSA/ Intract Compound Locations (NT)

Darwin



Figure 1 – Darwin McMahon Services Aust & Intract (NT) – 41 Bishop St Woolner

Alice Springs

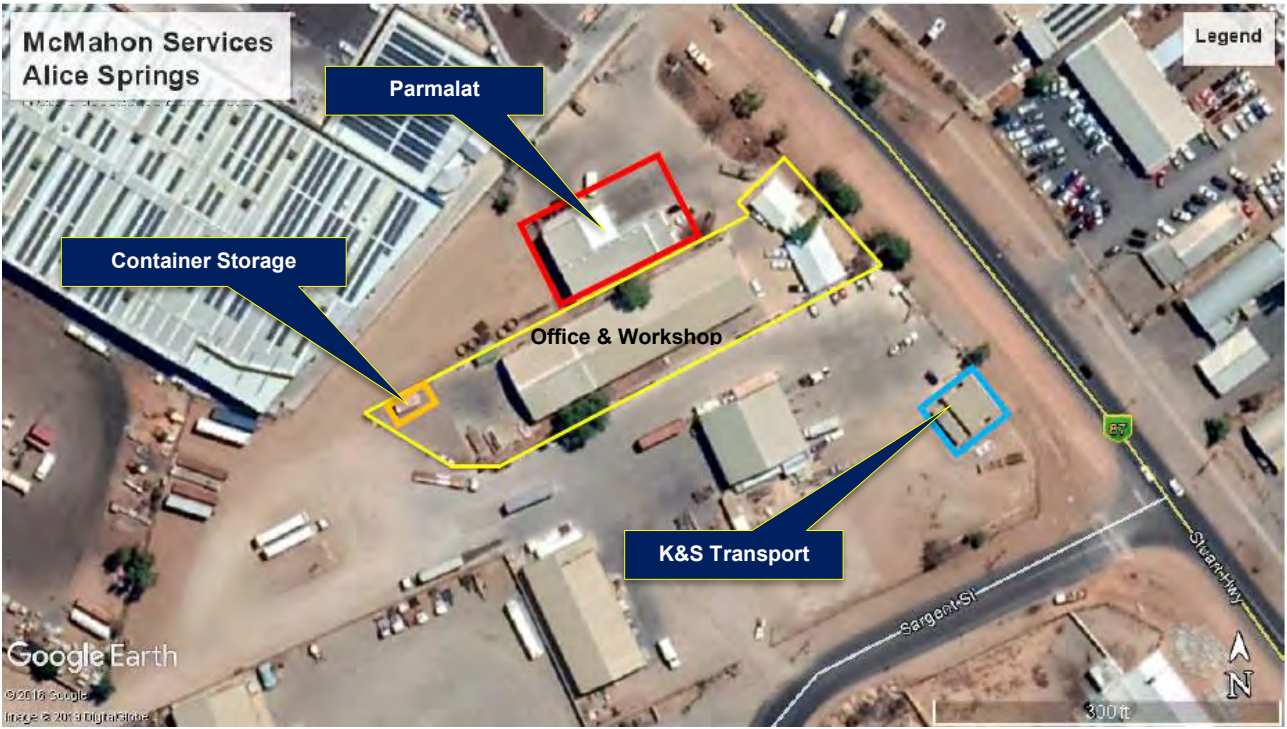


Figure 2 – Alice Springs McMahon Services & Intract (NT) 202 Stuart Highway

Katherine



Figure 3 – Katherine McMahon Services & Intract (NT) 33 Crawford St.

Management Plan	Environmental	EMP
------------------------	----------------------	------------

V1.0 | MONTH | YEAR | © WHSEQ Dept.

3. Organisation & Responsibilities

3.1.1. Key Site Contacts

DARWIN

Project Responsibility	Primary Contact	Address	Telephone
NT Manager	Mick Laidler	41 Bishop St Darwin	0417 587 086
Site Manager	Keith Manning	41 Bishop St Darwin	0407 998 377
Asbestos Site Supervisor	Grant Oehlman	41 Bishop St Darwin	0423 493 574
WHSEQ Advisor	Anthony Morphett	41 Bishop St Darwin	0447 294 790

ALICE SPRINGS

Project Responsibility	Primary Contact	Address	Telephone
NT Manager	Mick Laidler	41 Bishop St Darwin	0417 587 086
Site Manager	Joel Andrew	41 Bishop St Darwin	0477 820 816
Asbestos Site Supervisor	Danyl Boothey	292 Stuart Hwy Alice Springs	(08) 8958 5500
WHSEQ Advisor	Anthony Morphett	41 Bishop St Darwin	0447 294 790

KATHERINE

Project Responsibility	Primary Contact	Address	Telephone
NT Manager	Mick Laidler	41 Bishop St Darwin	0417 587 086
Site Manager	Keith Manning	41 Bishop St Darwin	0407 998 377
WHSEQ Advisor	Anthony Morphett	41 Bishop St Darwin	0447 294 790

3.2. Leadership and Accountabilities

The Company is committed to and responsible for the implementation and management of this EMP in order to manage the safe storage of Asbestos and other Listed Waste in the Darwin Bishop St Compound, Alice Springs Stuart Highway Compound and the Katherine Crawford Street Compound.

The Environmental and general duties and responsibilities of each employee are clearly defined in Position Descriptions provided to employees upon commencement of their employment. The Environmental

Protection specific duties and responsibilities of all project personnel are as detailed in this section within this plan. Each person engaged on site shall be required to read and acknowledge by signing his or her name on the induction register.

Detailed in the following sections are the specific responsibilities of each person on the project, which shall not in any way detract from the individuals' basic obligation to exercise due diligence in all matters relating to Health and Safety regarding the storage of Asbestos and other Listed Waste on site.

3.2.1. NT Manager

The NT Manager has overall on-site responsibility for Health and Safety of all persons involved in all projects. The NT Manager will liaise with the Asbestos Manager to establish the necessary procedures, and resources for implementing effective environmental impact protection to meet the Environmental Management Plan.

The NT Manager will exhibit absolute commitment to safety throughout all phases of the Asbestos and other Listed Waste transport, storage and removal and shall:

- Display 'Due Diligence' in all WHSEQ matters and champion the implementation of this project plan
- Appoint and allocate sufficient resources, trained and competent persons as may be required to assist with the effective management of the key aims and objectives of this plan
- Communicate to the project team and contractors that cost, schedule, and quality will not diminish the importance of implementation of the site Environmental Management Plan
- Actively promote WHSEQ performance objectives to the entire team
- Actively promote a WHSEQ culture that will mitigate the risk of injury to personnel and damage to plant, equipment and environment aspects of the storage site
- Establish and maintain clear responsibility and accountability for implementation of the Site Environmental Management Plan.

3.2.2. Asbestos Manger

The Asbestos Manager has the overall responsibility for the environmental performance of the storage site. The Asbestos Manager shall liaise with the NT Manger to establish the necessary procedures, and resources for implementing effective environmental protection to meet the Environmental Management Plan.

The Asbestos Manager will exhibit absolute commitment to safety throughout all phases of the Transport, storage and removal of Asbestos and other Listed Waste and shall:

- Display 'Due Diligence' in all WHSEQ matters and champion the implementation of this Project Environmental Management Plan
- Appoint sufficient trained and competent persons as may be required to assist with the effective management of the objectives of this Project Plan
- Allocate sufficient resources required to successfully implement the storage.
- Together with the management team lead by example, modelling the behaviour expected from all employees toward performing work in a safe manner
- Communicate to the team and contractors that cost, schedule, and quality will not diminish the importance of implementation of the Environmental Management Plan
- Actively promote a WHSEQ culture that will mitigate the risk of injury to personnel and damage to plant, equipment and environment aspects of the storage site
- Be actively involved with Site Environmental auditing and reports
- Review and revise the Plan as required.
- "Walk the Talk" approach by conducting site audits and inspections

- Participate in Environmental audits and inspections and interact with all personnel and organisations concerning improving safe work practices on the site
- Ensure members of the team, including contractors and their subcontractors and employees working on the storage site, are informed of hazards associated with the storage, and that there is compliance with environmental requirements
- Mitigate the risk of personal injury, equipment and property damage and prevent recurrences to as low as reasonably practicable ALARP
- Ensure all employees and contractors are made aware of the site emergency procedures
- Report all accidents, incidents and near miss to the NT Manager in a timely manner

3.2.3 Asbestos Supervisor

The Asbestos Supervisor is regarded as part of the Management Team and as such shall determine any actions that are or may be required in the absence or in consultation with the Asbestos Manager.

In addition, the Asbestos Supervisor is currently accommodated in the accommodation units within the Darwin Bishop St Compound. Alice Springs Stuart Highway Compound and the Katherine Crawford Street Compound are strongly secured at all times after hours.

The Asbestos Supervisor shall:

- Hold of A & B class asbestos removal qualifications
- Hold of asbestos removal Supervision qualifications
- Be fully conversant with McMahon Services and Intract Environmental expectations regarding Asbestos and other Listed Waste removal and storage
- Actively promote the safety of his Asbestos removal team
- Together with the management team lead by example, modelling the behaviour expected from all employees toward performing work in a safe manner
- Be actively involved with Site Environmental auditing and reports
- Participate in Environmental audits and inspections and interact with all personnel and organisations concerning improving safe work practices on the site
- Ensure members of the team, including contractors and their subcontractors and employees working on the storage site, are informed of hazards associated with the storage, and that there is compliance with environmental requirements
- Mitigate the risk of personal injury, equipment and property damage and prevent recurrences to as low as reasonably practicable ALARP
- Ensure all employees and contractors are made aware of the site emergency procedures
- Report all accidents, incidents and near miss to the Asbestos Manager immediately

3.2.4 Site Manager

The Site Manager has responsibility for the construction at the site including management of all employees, subcontractors, plant and equipment. He/ She will be actively leading the safety culture and ensuring compliance with McMahon and Intract procedures in conjunction with the WHSEQ Advisor.

The Site Manger shall:

- Promote and engage in open communication, cooperation and trust between its customers, contractors, workers, and suppliers;

Management Plan	Environmental	EMP
------------------------	----------------------	------------

V 1.0 | MONTH | YEAR | © WHSEQ Dept.

- The Asbestos Manager will exhibit absolute commitment to safety throughout all phases of the Transport, storage and removal of Asbestos and other Listed Waste;
- Facilitate the delivery and recording of toolbox and pre-start meetings and provide copies to the Managers on request;
- Report all accidents, incidents and near miss to the Project Manager, WHSEQ Advisor and the Contractor in a timely manner;
- Ensure monthly WHSEQ Reports are submitted promptly to the Project Manager;
- Participate in WHSEQ audits and inspections and interact with all personnel and organisations concerning improving safe work practices on the site daily;
- Ensure members of the construction team, including contractors, subcontractors and workers on site, are informed of hazards associated with work assignments, and that there is compliance with WHSEQ requirements;
- Actively support contractors to maintain the WHSEQ objectives and desired outcomes of the project
- Ensure that a practical WHSEQ interface is established between the workers and contractors, enabling them to individually function in a safe productive and harmonious manner
- Ensure that regular monitoring and assessment of the Asbestos and other Listed Waste storage areas is carried out in relation to on-site health, safety, environmental and community activities
- Mitigate the risk of personal injury, equipment and property damage and prevent recurrences to as low as reasonably practicable (ALARP)

3.2.5 WHSEQ Advisor

The WHSEQ Advisor is regarded as a part of the Asbestos Management Team and is seen as the initial point of contact to provide advice on environmental, work health and safety matters arising from the storage of Asbestos and other Listed Waste on site.

The WHSEQ Advisor shall assist and advise on the highest of safety standards for transport, storage and removal activities of Asbestos and other Listed Waste.

The Safety Advisor shall:

- Have the authority to
 - Enforce the implementation of all measures specified in this Environmental Management Plan and the Job Safety Environment Analysis statements JSEA`s
 - Stop any part of the works that does not comply with the Environmental Management Plan, JSEA`s, or the protection or safety of any person.
- Be familiar with the Environmental Management Plan and individual responsibilities regarding implementation and conformance with these plans.
- Provide support and assistance as necessary to the project team in implementing the WHSEQ procedures applicable to the storage requirements
- Assist reviewing Job Safety Environment Analysis JSEAs, where required.
- Actively support site management in a culture that will mitigate the risk of injury to personnel and damage to plant, equipment, environment and environmental aspects of the project.
- Advise when required, action to correct reported or observed unacceptable environmental, safety, and health conditions and/or behaviours.
- Enforce WHSE related work rules and take action as required to ensure compliance.
- Comply with company Fitness for Work Policy and procedural requirements.
- Review all accidents, incidents and near miss with the NT Manager, Asbestos Manager in a timely manner

3.2.6 Site Personnel

All personnel and staff working near the Asbestos and other Listed Waste storage area shall review JSEA/SWMS for the task they are performing. All personnel and staff are empowered to refuse to perform a potentially unsafe task. When the circumstances of a work activity change the site personnel and staff must complete a JSEA/SWMS F 230 to reassess the risks associated with the task.

The following behaviour will not be tolerated. A breach of this section 7.6 will be cause for the Company to remove the relevant personnel from Site and take disciplinary actions; it may also include the preclusion of that employee being engaged on any other project site for the Principal:

- Willful or reckless interference with, or misuse of, objects provided on site in the interest of health and safety.
- Smoking within any of the buildings, site amenities, enclosed public places, outdoor eating and drinking places.
- Being under the influence of any non-prescription drugs or alcohol.
- Unsafe equipment.
- No animals or pets are permitted on site.

The above, is incorporated in the McMahon Services and Intract induction and signed off by everyone involved on site.

3.3 Everyone Has Responsibility

All workers have the responsibility and authority to speak up without fear of repercussions resulting from not starting a task or stopping a task which may be considered unsafe to undertake. Workers must first make safe any situation identified and consult with affected workers to mitigate any risks before work commences or resumes.

All workers engaged on site shall display due diligence towards all WHSEQ matters arising on site. All workers have a duty of care to proactively exercise in which they must;

- Take reasonable care of their own health and safety
- Take reasonable care that their acts or omissions do not adversely affect the health and safety of other persons
- Comply with any reasonable instruction / policy / procedure provided by the Project team relating to WHS.

All workers have the responsibility and authority to speak up without fear of repercussions resulting from refusing to start a task or stopping a task which may be considered unsafe. Workers must raise all concerns with their supervisor for the purposes of risk mitigation in a timely manner. All workers are required to take reasonable steps in relation to preventing an adverse effect to themselves or another worker/s.

4 Emergency Preparedness and Response

An Emergency Management Plan for this project has been developed and implemented. The following actions are taken to ensure emergency situations are prepared for:

- Inform all workers of the Emergency Management Plan
- During induction inform workers of emergency points
- Display the Emergency Management Plan in visible locations in and around the Bishop Street premises
- Inform all personnel of their responsibilities associated with emergency preparedness

The Asbestos Manager shall identify through the risk assessment process, the emergency management requirements for the works to ensure an emergency plan is adequately prepared. The emergency plan must include procedures to;

- An effective response to an emergency and notification to stakeholders
- Evacuation procedures
- Effective communication to coordinate the emergency response

The emergency plan shall be implemented on the premises by including the content within the site plans, McMahon Services induction and posted on site. Testing of the emergency procedures shall be undertaken regularly for the purpose of identifying process gaps that may prevent sufficient emergency management which must be re-assessed and amended. Changes must be communicated to all workers and updated on site.

In addition to the above, the Company shall display in a highly visible location (Front and Rear Entrances) the following information at all times;

- Name and location of the emergency assembly point
- Full site address
- Site contact details
- Document emergency services details hospital, medical centre
- Define passage of egress
- Location of firefighting equipment
- Provide evidence to verify that subcontractors and visitors to the construction zone are fully briefed of the evacuation procedures throughout the premises.

Darwin Signage (Front and Rear Entrance)



Alice Springs Signage and Katherine Signage shall be installed with the same warnings and Emergency Contact details as shown above.

Under normal circumstances the storage of the Asbestos and other Listed Waste is eliminated by disposal immediately at an approved disposal site (Shoal Bay Waste Disposal Site). However, there are several circumstances that may not allow immediate disposal and therefore McMahon Services have developed this Environmental Management Plan to mitigate any risk whilst the Asbestos and other Listed Waste is stored on these premises.

The Asbestos and other Listed Waste shall remain in the Roll on Roll Off bin (RORO) and only if necessary will the bin be rolled of the transport truck. At no time will the wrapped and secured Asbestos and other Listed Waste Parcel be off loaded from the bin until it is disposed of at the approved site.

On occasion the Asbestos and other Listed Waste is stored on site fully contained in a dedicated shipping container. In these situations, there is no requirement for external monitoring as the containers area weather proof.

References:

SWI 0082 Emergency Planning for Work Sites

F 059 Emergency Evacuation Plan

4.2 Emergency Contacts

The Company propose for the emergency site contact to be the Asbestos Manager; these details are signposted at the access point to the site providing 24-hour contact details for any public enquiries. Should the Asbestos Manager not be available, telephone diversions will be implemented to other senior site personnel.

DARWIN

Person / Entity	Contact Number
Fire / Police / Ambulance	000
Police assistance	131 444
NT Reportable Incidents	1800 019 115 - 24-hour service
EPA Environmental Reportable Incidents	1800 064 567
Senior First Aid – Grant Oehlman	0423 493 574
Crisis / Traumatic Assistance – Mel Milosevic	0439 677 155
Return to Work Coordinator– Mel Milosevic	0439 677 155
Royal Darwin Hospital	(08) 8922 8888
Top End Medical Clinic Open until 9pm (2100hrs)	44 Stuart Hwy Stuart Park (08) 8930 4900

ALICE SPRINGS

Person / Entity	Contact Number
Fire / Police / Ambulance	000
Police assistance	131 444
NT Reportable Incidents	1800 019 115 - 24-hour service
EPA Environmental Reportable Incidents	1800 064 567
Senior First Aid – Sam La Porta	0408 253 279

Management Plan	Environmental	EMP
------------------------	----------------------	------------

V 1.0 | MONTH | YEAR | © WHSEQ Dept.

Crisis / Traumatic Assistance – Mel Milosevic	0439 677 155
Return to Work Coordinator– Mel Milosevic	0439 677 155
Nearest Hospital Alice Springs	(08) 8951 7777
Nearest Medical Centre Alice Springs	(08) 8952 2000

KATHERINE

Person / Entity	Contact Number
Fire / Police / Ambulance	000
Police assistance	131 444
NT Reportable Incidents	1800 019 115 - 24-hour service
EPA Environmental Reportable Incidents	1800 064 567
Senior First Aid – Luke Vanstan	0432 267 105
Crisis / Traumatic Assistance – Mel Milosevic	0439 677 155
Return to Work Coordinator– Mel Milosevic	0439 677 155
Nearest Hospital Katherine	(08) 8973 9211
Nearest Medical Centre Katherine	(08) 8963 6200

4. Management Systems

McMahon Services Australia and Intract are certified to the Federal Safety Commission Scheme, AS/NZS 4801:2001 Occupational Health & Safety Management Systems, ISO 9001:2008 Quality Management Systems, and ISO 14001:2004 Environmental Management Systems.

Our WHSEQ Management System integrates the above standards, legislative and regulatory requirements and is supported by a centralised Data Management System that can be accessed by all staff across the business.

This system manages our documentation including acts, regulations, standards, policies, procedures, safe work instructions and forms, as well as maintaining records for training, plant and equipment, and incident management.

Our integrated Business Management Manual has been developed to provide the guiding principles, objectives and processes of the WHSEQ Management System.

This WHSP, together with our suite of Management Plans will detail the management strategies and requirements for successful completion of the works in accordance with the McMahon Services Business Management System.

In addition to the WHSP, the following Project Specific Sub-Plans will be developed to form the Project Management Documentation:

- Emergency Response Management Plan
- Traffic Management Plan

4.1. Compliance Requirements

4.2.4 Legislation requirements

This project recognises the following key legislative requirements of the relevant statutory authority directly applying to the activities for this project not limited to:

- Work Health and Safety Act 2011
- Work Health and Safety Regulations 2011
- Code of Practice - Managing Risks of Hazardous Chemicals in the Workplace
- Code of Practice - Hazardous Manual Tasks
- Code of Practice - Managing Noise and Preventing Hearing Loss at Work
- Code of Practice - How to Manage Work Health and Safety Risks
- Guidelines for Consultants – Reporting on Contaminated Sites, 2011, State of NSW and Office of Environment and Heritage.

The Management team shall ensure all workers are able to access copies of the above legislation at all times. Current copies of the above legislation, and any amendments that may arise during the project, shall be maintained on site and utilised to update site documentation as necessary.

4.2. Workplace Policies

It is the policy of the Company, as far as is practicable, to ensure all employees, suppliers, subcontractors, visitors and the public are safe from injury and risk to health while on this site.

As part of the Company's overall commitment to its Environmental performance the following policies have been developed:

- Asbestos Policy

- Environmental Policy
- Chain of Responsibility
- Injury Management and Rehabilitation
- Traffic Management
- Work Health and Safety Policy
- Workplace Behaviour

These Policy Statements form an integral part of the Company's Safety System, and as part of the improvement process will be reviewed on a regular basis in consultation with employees. The Policies are included as appendices within this document.

4.3 Project Environmental Objectives and KPI's

The Environmental Management Plan objectives, targets and KPI's will be endorsed and agreed to by the project management team. The Management Team will provide direction to organise activities and resources to achieve Environmental Management objectives. The targets and objectives will be kept current and reflective of the project specific hazards and risks by regular reviews conducted by the NT Manager.

The objectives are;

- Zero Harm to members of the Public
- Zero Harm to workers on the project
- Detrimental impact upon the environment
- No equipment or property damage
- Compliance with legal requirements
- Compliance with the WHSEQ system
- Compliance with McMahons procedures and instructions.

The targets are:

- No injuries or incidents during any works
- No equipment or property damage
- Full compliance with legal and Company system requirements.

These measurements form the project Key Performance Indicators KPI's. These KPI's are defined within the table below:

OBJECTIVES	STRATEGY	KPI
Zero Harm to persons or the environment	All Job Safety Analyses JSA's are developed as identified by the RAR. The JSA's are completed to a defined standard and reviewed by the site team.	100% compliance with RAR requirements.
No equipment or property damage.		100% compliance with schedule.
Zero defects.	Safety consultation and project review meetings occur as scheduled.	100% compliance with schedule.
Compliance with legal requirements.	Incident reports are completed as required and within specified timeframes.	Review of incident reports confirms compliance.
Compliance with the WHSEQ system.	Safe Act observations are conducted	Safe Act Observations are conducted as per schedule.

5 Risk Management

5.2 The Risk Assessment Process

The first step in the risk management process is to identify the hazards associated with the project. Once the hazards have been identified the assessment process can be applied to determine risk levels.

Assessing the risk of identified hazards includes considering the severity of any environmental consequence that could occur and the likelihood or chance that the environment will be affected.

A matrix may then be used to assist with calculating the level of risk for the hazard assessed. This calculation results in a Risk Rating which is achieved by the use of a Risk Matrix – tables A, B and C below.

5.2.4 Table A Consequence

Guideline to identify the maximum reasonable consequence

LEVEL	DESCRIPTOR	EXAMPLES
1	Insignificant	No injuries, limited damage to area.
2	Low	First aid treatment, on-site release immediately contained
3	Moderate	Medical treatment required, on-site release contained with outside assistance
4	Major	Extensive injuries, loss of production, off-site release with no detrimental effects
5	Extreme	Fatality/ Multiple fatalities, toxic release with detrimental effect

5.2.5 Table B Likelihood

Guideline to identify the probability.

LEVEL	DESCRIPTOR	EXAMPLES
A	Very Likely	Is expected to occur in most circumstances
B	Likely	Will probably occur in most circumstances
C	Moderate	Might occur at some time
D	Unlikely	Could occur at some time
E	Rare	May occur only in exceptional circumstances

5.2.6 Table C Qualitative Risk Analysis Matrix Level of Risk

Consequence x Likelihood = Risk Rating

		CONSEQUENCE	INSIGNIFICANT Level 1	LOW Level 2	MODERATE Level 3	MAJOR Level 4	EXTREME Level 5
LIKEHOOD	Very Likely A		H	H	E	E	E
	Likely B		M	H	H	E	E
	Moderate C		L	M	H	E	E
	Unlikely D		L	L	M	H	E
	Rare E		L	L	M	M	H

5.3 Risk Assessment

Prior to commencement of on-site storage, a risk assessment of the storage shall be undertaken ensuring controls are in keeping with 'hierarchy of control' requirements. Outputs of the assessment shall be documented on the Risk Assessment Register (RAR).

The Risk Assessment will be reviewed on a regular basis, with any changes to risks or hazards documented accordingly. All new hazards or risks arising during this transport, storage and removal shall be added to this risk assessment, and controls shall be put in place to manage them.

References:

SP 211 Risk Management

F224 PRAR – Project Risk Assessment Register

5.4 Hierarchy of Controls

Some control measures are more effective than others. Control measures can be ranked from the highest level of protection and reliability to the lowest. This ranking is known as the hierarchy of control. The higher order controls must always be considered first.

5.5 Reviewing Control Measures

The control measures that are put in place to protect health, safety and the environment will be regularly reviewed to make sure they are effective. A review will occur on a regular basis which is undertaken using the same methods as the initial hazard identification process. Various methods include workplace inspection utilising section 2 of form F627 Weekly Toolbox, consultation between workers and raising OFI's and conducting Safe Act Observations using form F007 SAO.

Reviewing the control measures also involves considering whether a higher order control measure is now reasonably practicable.

6 Induction and Training

Prior to personnel commencing work on any McMahon Services site including subcontractor employees, a site-specific induction is to be completed. Persons undertaking the induction shall be required to complete Form F619 – Site Induction Form stating that they are aware of, and will abide by, the Environmental Management Plan, policies, procedures and instructions for the site.

The induction process is as follows:

- All personnel shall hold a General Construction Induction Training Card (White Card)
- Company Site Induction.
- Completion of the Site Induction Form and Questionnaire Form F619
- RF0003 Environmental Awareness Training shall be completed by all personnel

The McMahon Services Induction will cover the following topics:

- Establishing competency and qualifications copies of tickets required
- Emergency requirements for the site assembly points, evacuation routes, Medical/First Aid facilities, contact details of Emergency Personnel and services, first aiders, firefighting equipment
- Site facilities toilets, crib sheds, water supply etc.
- Site specific hazards e.g. Asbestos and Listed Waste Storage
- Site and company procedures Incident, Injury and hazard reporting, JSEA's, SAO's, audits and inspections, Issue resolution, site security
- Personal Protective Equipment requirements for the site.
- Relevant JSEA's for any tasks to be performed by the new inductee.
- Any specialised equipment for the task
- Further details required by the new inductee to ensure that they understand the requirements of the site and knowledge of where they can and cannot go.

A register of all inducted personnel and subcontractor employees will be maintained by the Site Safety Advisor.

References:

SWI 098 – Project Induction Process

F619 – Site Induction Form

6.2 Visitors Induction

Signage shall be displayed at the entrance to the site compound for all visitors and contractors entering the premises. All visitors to the site must sign the Visitors Log at the Office Reception and must be escorted at all times by a fully site inducted person.

All visitors shall be supplied with and required to wear the mandatory Personal Protection Equipment whilst on site. Visitors who do not comply with these requirements will be escorted from site. Children under the age of 16 years shall not be permitted on site this includes children in the custody of site personnel.

6.3 Competency for Prescribed Occupants and Activities

Personnel required to carry out any work or task within a "High Risk Work Occupation" e.g. Asbestos transport, and removal etc., must be a Licensed Person i.e. hold a current License or valid Certificate of Competency.

All personnel involved with the removal, transport, and storage of Asbestos and other Listed Waste shall be licenced with "A" and or "B" class certification for the tasks being undertaken

Management Plan	Environmental	EMP
----------------------------	----------------------	------------

V1.0 | [MONTH] | [YEAR] © WHSEQ Dept.

6.4 Site Induction Register

A Site Induction Register shall be maintained detailing all appropriate drivers licenses, high risk work licenses, competency certificates, and any training an employee has undertaken during the works. The Site Induction Register shall be updated immediately after conducting a site induction.

References:

F417 Induction Register Skills Matrix

6.5 Change Management

If there is a change in any aspect of the works that has an impact on Safety or the Environment by introducing new risks the Company will undertake Workplace Change Assessment in line with SWI0144 – Workplace Change Process Flow Assessment and Approval and amend the current task specific JSEA or develop a new JSEA to control, the risks and hazard prior to that change being implemented.

Personnel associated with the task shall be re-inducted and sign onto the JSEA contents to ensure clarity in understanding the changes implemented. If required external resources shall be sourced in regards to significant changes i.e. new plant or equipment to undertake the task. This change process is captured via the Daily Job Start Checklist / Meeting.

References:

SWI0144 – Workplace Change Process Assessment and Approval

F235 – Daily Pre-Start Meeting

7 Site Establishment

7.2 Site Establishment / Working Hours

The Bishop Street site requires establishment to enable a safe workplace for workers to undertake the works and to also protect members of the public from entering the site.

Key elements required;

- Site security to prevent entry to site by unauthorised people.
- Signage posted in areas where information requires communicating.
- Adequate facilities to enable handwashing, toileting and rehydrating.
- Clearly identified access and egress around site.
- There is access to Decontamination in the unlikely event of an Asbestos or other Listed Waste spill

The proposed times for the site gates to remain open will be generally 0630 to 1800 Monday to Saturday after which time the on-site Caretaker will close and lock all gates each day.

Additionally, the site signage shall include;

- The Company`s name, telephone contact numbers including after-hours contact numbers

Reference:

SWI 0118 - Project Site Setup

7.3 Site Security

The storage of ACM and other Listed Waste has specific requirements for access, security and safety. All locked gates are required to prevent the entry of unauthorised persons and to protect the general public.

Any hoardings that require approval, the Company Project Manager will consult with the Superintendent. Sample hoarding is to be offered for approval. Acoustic hoarding to neighbouring properties is to be provided. Provision of A class hoarding is to be provided for different stages of the works under contract.

8 Incident Reporting and Investigation

Any environmental incident is to be immediately reported to the Site Supervisor.

In the event of a minor incident, the Site Supervisor shall record this using F 700 - Minor Incident Form and send it the WHSEQ Department for review.

In the event of a major environmental incident, the Site Supervisor will notify the Asbestos Manager and Safety Advisor immediately, or as soon as practicably possible.

All major incidents must be recorded on form F406 – Incident Report and submitted to the Safety Advisor and the NT Manager prior to the end of the shift.

All corrective / preventative actions and control measures which have been recommended as a direct result of an incident investigation shall, where possible, be determined using the “Hierarchy of Controls”. All corrective and preventative measures stated on the incident report form shall be implemented as soon as practicably possible.

All incidents requiring medical treatment or near misses of a life-threatening nature shall be reported to the Superintendent within three 3 days of such incident and will provide a report giving complex details of the incident, including results of investigations into its cause and any recommendations or strategies for prevention in the future. All incidents shall be recorded within the weekly and monthly reports.

All environmental incidents are to be reported to the NT EPA and NT Worksafe immediately by the Asbestos Manager. The initial report shall be brief with a follow up documented report with details and remedial action for approval.

References:

SP403 – Accident Incident Near Miss Reporting and Investigation

SWI 0018 Incident Investigation Process Flow

F 406 Incident Report

F 700 Minor Incident Report

9 Consultation and Communication

Consultation shall occur with all workers and contractors on Environmental or WHS issues for this project, including:

- Toolbox \ prestart meeting where anyone can raise issues
- During planning activities informal and or during the development of JSEA'S
- Where changes to the site arrangements could affect the health and safety of workers
- Where investigations into incidents are undertaken to determine the details of the incidents and corrective action required to prevent reoccurrence.

References:

Consultation and Communication Plan

9.2 Daily Pre-Start Meetings

A pre-start meeting shall be held daily by the Site Supervisor prior to a work shift commencing. Daily Prestart meetings are used to communicate the site requirements for the day which include task to undertake, any changes to the work environment e.g. Asbestos or other Listed Waste storage, as well as opportunity for workers to raise concerns they may have.

References:

SWI 057 - Conducting a Daily Pre-Start Meeting

F 235 - Daily Pre-Start Meeting

9.3 Toolbox Meetings

Toolbox meetings shall be conducted weekly by the site supervisor responsible or delegated person. The Toolbox Meeting form F627 Weekly Toolbox Meeting Minutes shall first be utilised to undertake a site inspection via section 2 of the form. This checks specific elements on site for legislative compliance and provides opportunity to identify any site related issues such as; test and tag is current for electrical appliances which assists in building the points of discussion for the Toolbox meeting. The following points shall apply to the toolbox meeting:

- All relevant health and safety topics raised during the weekly site inspection.
- Review of any relevant WHS matters within the company and / or industry.
- Review any incidents and / or near misses.
- Review any outstanding OFI's and action required to close out items remaining.
- Scheduling SAO's for the following week.
- Workers have the opportunity to voice any concerns or opinions regarding WHS issues.

Any items raised requiring action shall be recorded on the current Site Improvement Plan posted on site with persons delegated to each item for action by a proposed date. A copy of the latest minutes shall be posted in the Bishop St Office to enable access to the information.

References:

SWI 055 Conducting a Toolbox Meeting

F 627 Weekly Toolbox Meeting Minutes

9.4 Safe Act Observation

A Safe Act Observation SAO is an activity where one person observes another person performing a task and measuring the process demonstrated against the written instruction. The purpose for observations is to

Management Plan	Environmental	EMP
------------------------	----------------------	------------

V1.0 | MONTH | YEAR | © WHSEQ Dept.

identify and positively reinforce correct work being performed, and identify undesirable behaviours or conditions and eliminate through opportunities for improvement OFI's.

The observer assesses how the person is performing the task in accordance with the written instruction provided such as JSA / Safe Work Instruction. The observer then identifies areas where the person or workgroup performed the task correctly and where improvement can be made.

References:

SWI 020 Safe Act Observation

F 007 Safe Act Observation

9.5 Site WHS Co-Ordination Meetings and Records with Other Duty Holders

The Company shall consult, co-operate and co-ordinate activities with all other duty holders. The Superintendent will host weekly WHSE coordination meetings to discuss site WHSE issues. The Company's Site Supervisor or WHSE Representative shall attend these meetings, so that all duty holders are aware of each other's work load for the week. If there are significant changes to the day's activities an impromptu meeting will be called with all duty holders.

9.6 Site Improvement Plan SIP and Opportunity for Improvement OFI

The SIP is used to capture OFIs raised by any worker on site for the purpose of managing hazards, tracking activities and actioning items of requirement for the project. The SIP shall be posted on site within the site huts to allow workers the opportunity to raise concerns regarding the project. The supervisor and / or managers on site shall review these daily and nominate responsibilities to close out such items accordingly.

If an OFI is raised on the SIP which cannot be actioned at the site level, the information shall be recorded onto an OFI form and submit to WHSEQ for allocation to the responsible person for action.

References:

SWI 079 Hazard Management – Using the Site Improvement Plan

F 150 Site Improvement Plan

F 700 Opportunity for Improvement

9.7 Monthly Reporting

The Company captures KPI's and statistics from site via a Monthly Report Card Form F 009. This report card captures information such as;

- Hours worked
- Incident statistics if applicable
- Audits performed
- OFI status

The Report Card shall be completed at the end of each calendar month and a copy submitted to the WHSEQ department for collating information.

In addition to the Company's monthly report requirements, the following information shall be submitted;

- Number of incident notifications to the Regulator
- Actions taken by Regulator in relation to each incident
- Number of non-conformances issued by Principal, WHS & Superintendent and Contractor
- Environmental issues

In addition to the environmental reporting OH&S is determined as a High Priority as well;

Management Plan	Environmental	EMP
------------------------	----------------------	------------

V 1.0 | MONTH | YEAR | © WHSEQ Dept.

- Number of incidents recorded in register of injuries
- Number of medical treatment only incidents
- Number of lost time injuries
- Lost time injury frequency rate LTIFR
- Number of working days lost due to injury

The internal Monthly Report shall be made available for the Regulatory Authorities on request.

References:

F 009 - Monthly Report Card

10 Job Safety Environment Analysis JSEA

Form F230 Job Safety Environment Analysis JSEA facilitates for a written document that sets out the work activities programmed to be undertaken, identifies the hazards and risks arising from the proposed activities and the control measures to mitigate the associated risks. Its primary purpose is to help supervisors and workers implement and monitor the control measures established at the workplace to ensure work is carried out safely.

The content of a JSEA should provide clear direction on the control measures to be implemented. There should be no statements that require a decision to be made by supervisors or workers. A JSEA must take into account the circumstances at the workplace that may affect the execution of works by considering the work environment and the workers carrying out the work. Workers should be consulted in the preparation of the JSEA. If there are no workers engaged at the planning stage, consultation should occur with workers when the JSEA is first made available prior to works commencing.

References:

SWI 0002 – Job Safety Analysis and Safe Work Method Statement
F230 - Job Safety Environmental Analysis

10.2 Review and Monitoring JSEA's.

JSEA's shall be taken through a system review process utilising form F230-1 JSEA Review to measure the document against criteria derived from legislative and federal safety requirements as well as validating critical items have been considered and if applicable, controlled. The aim of the review outcome is to qualify the document is compliant to these requirements or identify any gaps in deficiencies if any are present which then enables the ability to amend the JSEA appropriately. A register of all JSEA's will be kept on site using form F258 JSEA Register to monitor review dates and control document versions.

Supervision of works shall be applied to ensure the works are being carried out in accordance with the JSEA. Supervisors shall schedule and undertake Safe Act Observation's for the purpose of identifying any potential deviation from the JSEA. These documents are considered as "living" which enables amending and re-assessment of the task where changes in the task or environment are identified to prove risk mitigation is ALARP.

Contractors and subcontractors are required to submit JSEA's to the project team for review prior to commencing any task as per subcontractor terms and agreement.

References:

F 230 - Job Safety Environment Analysis Review
F 258 - JSEA Register

10.3 Permit to Work System

The Company recognises that certain activities undertaken can be inherently hazardous to the workers' health and safety.

As such, a Permit to Work is required for all work performed involving the following hazards: -

- Asbestos
- Listed Waste
- Confined Space
- Demolition
- Excavation / Penetration
- Excavation Entry

Management Plan	Environmental	EMP
------------------------	----------------------	------------

V 1.0 | MONTH | YEAR | © WHSEQ Dept.

- Hot Work
- Lifting Operation - Lift
- Working at Heights

The Permit to Work System provides a systematic disciplined approach to assessing the risks of a job and specifying the precautions to be taken.

The permit to work system:

- specifies the work to be done and the equipment to be used
- specifies the precautions to be taken when performing the task
- gives permission for work to start
- closes out the task once complete

The system provides a check to ensure that all safety considerations have been taken into account, including the validity of permits and certificates and compliance to the Company's policies and procedures.

References:

S-004 – Permit to Work System

11 Subcontractor Management

11.2 Prequalification

Prior to commencing work for the Subcontractor Company shall be assessed to ascertain whether the company has the capability of delivering work. This will determine whether the Subcontractor understands the gravity of any potential issues regarding Asbestos and other Listed Waste being stored on site:

- While achieving and upholding benchmark Environmental requirements for the project
- With plant fit for purpose and inspected and serviced to manufacturers requirements
- That does not adversely impact on the environment
- That is to the agreed workmanship
- That is free of defects and

Subcontractor contract companies must hold the necessary registrations, License's and insurances to operate as a business and to perform certain tasks.

References:

F511 - Contractor WHS Pre-qualification Assessment

11.3 WHS Participation on Site

In addition to prequalification requirements, subcontractors must participate in all project WHS activities including;

Any inductions required to enable works on site,

- Daily pre-start meetings,
- Site inspections,
- Toolbox meetings,
- Safe Act Observations,
- Contribute to the project KPI's,
- Participate in Safety Focused moments
- Report any hazards / incidents to the Asbestos team in a timely manner.

References

SP 220 - Subcontractor Management

12 Environmental Management

12.2 Housekeeping

The Company shall comply with the following requirements;

- Maintain the worksite in a clean and orderly manner
- All debris and scrap material shall be kept away from the Listed Waste storage area
- General waste shall be disposed of at frequent and regular intervals
- Regular inspections of the premises to ensure a safe working environment is maintained
- Any substances that are spilt must be cleaned up as soon as practicable only by appropriately licensed personnel

Generally, it is important at all times to keep the premises clean and free of debris. Keeping the worksite clean prevents possible contamination of the environment.

12.3 Stormwater Control

The Company shall prevent stormwater contamination in accordance to EPA requirements and the site requirements. During the Asbestos and other Listed Waste storage, nominated drains shall be protected with silt socks or mesh and maintained to prevent pollution entering the stormwater system. General housekeeping on site shall be conducted at all times to mitigate risk of environmental impact.

12.4 Discovery of Contaminated Materials

Any suspected contaminated material shall be handled in accordance with Safe Work Procedure SWI 0300 – Asbestos Management – Discovery of Asbestos or other Listed Waste to ensure that the discovery of contaminated materials is handled in a safe manner, and is handled in accordance with all relevant codes and standards.

The SWI shall be communicated to all employees and subcontractor employees at toolbox meetings and, if required, pre-start meetings.

A register of all contaminated materials discovered on site shall be maintained in the project Safety files by the Site Safety Representative.

A map detailing the location of contaminated materials discovered on site shall be kept and maintained with the register.

All personnel who have been subject to contact with contaminated materials shall be entered onto a separate register, and all relevant details of their contact with the materials shall be placed on their personnel files.

References:

SWI 0300 – Asbestos Management – Discovery of Asbestos

12.5 Soil Contamination

The Asbestos Manager will continually assess the storage site for any indicators of the possible presence of contaminants to action appropriately according to the class. Soil samples are collected from areas of suspected contamination for determination by a competent person as to whether further investigations are necessary. Samples are to be collected in accordance with acceptable quality assurance protocols, including sample containers, decontamination and chain of custody.

If contamination is qualified, environmental and safety controls shall be installed prior to activities being undertaken. All work shall be performed in accordance with a Safe Work Method specifically designed for the task that has addressed all environmental and safety issues.

12.6 Environmental Table

AREA OF RISK	PURPOSE	MONITORING REQUIREMENTS	REMEDIAL ACTION	RESPONSIBILITY
Asbestos & Listed Waste	Remediation	Daily as required Refer F301	Asbestos and other Listed Waste to be stored & disposed in accordance to State / Territory / EPA Legislation Notify authorities and neighbours	Asbestos Manager / Site Supervisor
Contaminated Soil	Site remediation	Daily as required Refer F301	Contaminated soil to be tracked. Compliance to EPA regulations	Asbestos Supervisor/ Site Supervisor
Air Quality	No injury / illness from atmospheric contaminates	Air monitoring as required, regular equipment servicing.	Air Quality Monitoring where necessary during Storage.	Site Supervisor/ Hygienist
Soil and Erosion	Protect open drains and natural drainage systems	Daily as required, limit clearings Refer F301	Clearing areas of high erodible soils and slopes which are prone to high wind and water. Suppress dust. Maintain stockpiles no higher than 2m. Protect existing water ways.	Asbestos Supervisor/ Site Supervisor
Severe Rain Storms	Assess water level in bins containing wrapped Listed Waste	Hourly Visual inspections	Bins will allow water escape, however the Listed Waste is wrapped and sealed to ensure no Listed Waste can escape the wrapping	Asbestos Supervisor/ Site Supervisor
Cyclonic Weather	Environmental emission	Nil required	No Listed waste will be stored on the Branch premises after notification of a Tropical Low that may be forming in the NT vicinity. Any stored Listed Waste shall be removed immediately.	Asbestos Manager/ Site Supervisor

13 Disciplinary Action

Disciplinary action shall be applied to any worker found in breach of their environmental responsibility in adherence with the company system and protocol. If it can be proven the worker has breached a responsibility the potential action may result in the removal from site through to employment dismissal subject to causal factors and recommendations by management.

13.2 Company Employee Management

Any Company employee who acts in an unsafe manner, or whose conduct is contravene to any reasonable work instructions or requests in regard to safety issues, policies, procedures or safe work instructions shall be subject to disciplinary action up to and including termination of employment.

Failure to comply with the current Environmental Legislation, WHS, and Site Safety Rules will also result in immediate disciplinary action being taken.

All disciplinary actions shall be dealt with by senior management.

References:

SP026 – Employee Disciplinary Procedure

13.3 Subcontractor / Labour Hire Warning Notices

Safety Warning Notices may be issued to any subcontractor employee or, labour hire personnel engaged on any Company worksite who have been observed breaching any company or legislative rules shall be excluded from this site.

Where required, the notices will be raised by the Asbestos Manager, however must be reviewed and approved by the NT Manager prior to issue. Minor breaches e.g. the failure to wear the correct PPE may be handled by a verbal warning only, however repeated minor breaches will result in the issue of a Warning Notice.

For a major safety breach e.g. interfering with stored Asbestos and Listed Waste, a Warning Notice shall be issued and depending on the seriousness, could also result in immediate expulsion from this site.

14 Workplace Audits and Inspections

14.2 Spot Checks

Spot checks of the stored Listed Waste will be completed daily.

14.3 Visiting Manager`s Inspection

The Company Internal System Audits are outlined within SP 207 Audit and Inspection System Procedure. Scheduled project team audits and inspections are for Safety and Environment activities relevant to a level of risk. The Visiting Manager shall utilise form F245 Visiting Manager Inspection Record, to perform the workplace audit. Any actions arising from the audit shall be discussed amongst the site team via the toolbox meeting and closed out within a timely matter.

References:

SP 207 Audit and Inspection System Procedure

F245 Visiting Manager Inspection Record

14.4 Environmental Review

The Company Senior Management shall conduct a comprehensive review of the Environmental Management Plan at three-monthly intervals to check its continuing suitability and effectiveness in satisfying the company's WHSEQ objectives and targets. This review will be in accordance with the procedure SP209 Document and Data Control.

The reviews will take into account the following:

- Results from audits and inspections
- WHSEQ KPI's
- Information from incidents and risk assessments
- Feedback from site meetings

Incident reviews for serious incidents shall involve senior management.

14.5 Workplace Audits, Inspections and Meetings

The Company Internal System Audits are outlined in its Business Management System.

Scheduled project team audits and inspections for Safety and Environment activities relevant to a level of risk are listed below as:

WHSE Activity	Risk H L M	When	Who
Pre-Contract Start Up Meeting F602	H	Before commencement	Project Team
Work Health Safety Environmental Quality Plan, Project Risk Assessment and Register, JSEA's to be established, approved and signed.	M	Before commencement	All site operatives
Site Induction/s F 619	L	Before commencement	All site operatives

Management Plan	Environmental	EMP
------------------------	----------------------	------------

V 1.0 | [MONTH] | [YEAR] © WHSEQ Dept.

Daily Prestart Meetings F235	H	Daily	All site operatives
Permit to Work	H	Daily	All site operatives
Safe Act Observation Audit SAO F 007 for high risk work: refer to project risk assessment and Register	H	Weekly Minimum	All site operatives
Toolbox/Safety Culture Meetings F 627	M	Weekly	Site Supervisor
WHSEQ Plan and Project Risk Assessment and Register Review	H	At project start & then quarterly	Project Team
WHSEQ Report Card F 009	M	Monthly	Site Supervisor

14.6 Audits

External audits for the Company and subcontractors may be undertaken at any time without notice to review the Company's compliance with any matter relating to safety requirements of this contract or legislation. If a non-conformance is detected during an audit, the Company shall take immediate action to rectify the non-conformance raised.

References:

SP207 – Audit and Inspection System

14.7 Monitoring and Measurement of Environmental Performance

A specific project workplace schedule shall be established for the project team to execute. The schedule shall consist of the following items to monitor and measure WHS performance:

- Monthly completion of WHSEQ report card
- Review of the project plan and risk assessment,
- Count of the number of SAO audits conducted,
- Form 950 Project Daily Diary includes hours of sub-contractors, employees and agency labour.

15 Environmental Plan Checklist

The Asbestos Management Team shall review the Environmental Management Plan on a quarterly basis to determine the effectiveness of the Plan. If this plan does not conform the Asbestos Manager is to be contacted immediately to action the necessary item. The checklist for the Project WHS Plan is as follows:

Activities Reviewed	Conforms		Review Date	Next Review	Conforms	
	✓Yes	*No			✓Yes	*No
Changes and Distribution						
Details/Description of Works/Organisation details are correct						
Environmental Policy is signed and dated by Managing Director						
Environmental Objectives and Targets are allocated and sighted						
Listed Waste storage site continues to be an effective and secure area						
Job Safety Environment Analysis are developed and current to work						
Site Specific Inductions register and records are current F619						
Roles and Responsibilities are sighted and signed						
Periodic workplace inspections and meeting program has been completed						
Incident/Near Miss reporting procedure is current						
References to Environmental legislation, Standards and Codes of Practice are current and available						
Registers are current and up to date						

Appendix 1 – Company Policies

Policy	Environmental & Community	POL-ENV
--------	---------------------------	---------

V1.0 | MONTH | YEAR | © WHSEQ Dept.

Environmental & Community Policy

McMahon Services operates in a manner that is compatible with the balanced environmental and current climate needs of the communities in which it operates. McMahon Services is committed to continuous efforts to prevent, or otherwise minimise, mitigate and remediate harmful effects of our operations on the environment.

As part of our continual commitment to providing a safe working environment, we shall:

- Ensure Senior Management provides strong leadership that is highly visible.
- Comply with all applicable laws and regulations and apply best practice where laws and regulations do not exist.
- Work with the client, the community and other stakeholders to develop a transparent relationship, including effects on energy and product use and supply.
- Communicate with the public on environmental matters and facilitate with others to improve the environment.
- Manage our operations with the goal of preventing incidents and of controlling emissions and waste below harmful levels.
- Provide performance indicators to ensure continuous improvement is met in our environmental management systems.
- Conduct reviews and evaluations of our operations to measure compliance by completing audits and inspections.
- Respond quickly, effectively and with care to emergencies or accidents resulting from our activities in co-operation with industry organisations and government agencies.
- Adopt a consultative process between management, employees and contractors with the view to maintain management systems and that promote and continually improve performance.
- Customer satisfaction remains inherent to our business.
- A professional approach to customer interface is maintained at all times.
- Any complaints are dealt with efficiently and within an acceptable time period.



David McMahon
MANAGING DIRECTOR



Page 1 of 1






IF PRINTED - UNCONTROLLED

Policy	Workplace Behaviour	POL-WB
--------	---------------------	--------

000 JAN 2015

Workplace Behaviour Policy

Our people are central to what we do.

McMahon Services Australia Pty Ltd is committed to creating a positive workplace, which in turn generates a productive and harmonious environment. McMahon Services aim to operate a safe workplace that is injury-free and fatality-free and enhances the wellbeing of employees, contractors and communities.

We are committed to achieving leading industry practice in work, health and safety, and in all cases, we will aim to meet or exceed applicable legal and other requirements.

To ensure McMahon Services high standards are achieved throughout our operations:

- We expect all personnel to be responsible for their own safety and the safety and wellbeing of others around them in the workplace and the community.
- We have a zero tolerance to any inappropriate behaviour which could cause harm to yourself or others.
- We have a zero tolerance to any abusive, violent or threatening behaviour.
- Our Code of Conduct acts to provide guidance on acceptable workplace behaviour.
- We have a dedicated Human Resources Department to provide support and guidance as needed.
- We commit to provide all necessary training required for staff to perform their duties in a safe manner.
- We encourage open and honest communication with our staff, clients and other stakeholders.
- Our employees will follow our Core Safety Expectations:
 - ◊ Always follow High Risk procedures when working with scaffolding, rigging, and mobile plant.
 - ◊ Always follow Fall Protection standards when working at elevated heights.
 - ◊ Always follow Written Permit procedures regarding confined space, hot work, excavation or subsurface work, gas testing.
 - ◊ Always follow Lock Out/Tag Out (LOTO) procedures.
 - ◊ Never talk or text on a hand-held mobile phone when operating a vehicle or mobile plant.
 - ◊ Always follow the written PPE requirements for the work being performed.

This Policy applies to all work-related situations including, but not limited to, when you are:

- In the workplace, whether during or outside normal working hours.
- During work activities, including but not limited to dealings with colleagues, clients and customers whether on or off-site, whether face to face or using information systems or media forms.
- At work-related events, including but not limited to conference, social functions and living away from home (i.e. camp sites).



David McMahon
MANAGING DIRECTOR

Policy	Chain of Responsibility	POL-COR
--------	-------------------------	---------

03 JAN 2017

Chain of Responsibility

McMahon Services Australia Pty Ltd shall maintain systems of work so that our daily operations do not place any person at risk of injury or ill health. Our Chain of Responsibility obligations will be strictly adhered to by all participants within the company transport chain.

Our transport chain includes, but is not limited to, schedulers, loaders, company and subcontract drivers and transport companies. McMahon Services Australia Pty Ltd will confirm that all loads comply with all relevant State and Territory laws.

McMahon Services incorporate the following practices into its daily activity:

- Our schedulers and drivers are trained in basic driver fatigue management.
- Local and long distance drivers assess their fitness for work prior to starting their daily activities.
- Vehicles and drivers possess current licenses and permits to operate.
- Vehicle prestart checks are performed daily prior to start up.
- Maintenance and service records are kept on company owned vehicles.
- Vehicles and drivers are audited every quarter in relation to maintenance and basic fatigue management.
- Vehicles are maintained to comply with Original Equipment Manufacturer and Australian Design Rules specifications.
- Vehicles are weighed prior to transportation to confirm correct mass and axle group weights in accordance with relevant State and Territory laws.
- Vehicles are audited to confirm loads are safe and roadworthy.
- All vehicles over 12 tonne GVM are required to have Basic Fatigue Management training.
- Long distance transport or over mass consignments has a Safe Route Plan in place, prior to departure.
- Vehicles travel within marked speed limits.
- Load restraint equipment is inspected and maintained in a fit for purpose condition.



David McMahon
MANAGING DIRECTOR



Policy	Asbestos	POL-ASB
--------	----------	---------

VER. JAN 2017

Asbestos Policy

McMahon Services is committed to continuous improvement in quality performance, delivering a high level of service to our clients. McMahon Services' procedures for asbestos removal, ensures the safety of our employees and others that are involved in these activities. Every member of staff is involved in managing how we can improve today, tomorrow and long into the future. From the smallest procedure to the largest contract, quality is our passport to customer satisfaction and to our future business.

The aim of our asbestos management system is to:

- Ensure Senior Management provides strong leadership that is highly visible.
- Comply with all applicable laws and regulations and apply best practice where laws and regulations do not exist.
- Provide performance indicators to ensure continuous improvement is met in our asbestos management systems.
- To ensure safe handling, removal and transport of materials containing asbestos.
- To promote community awareness of the dangers of asbestos and the safe and correct methods for removal, transport and disposal.
- To ensure the transport of asbestos waste material will comply with the Australian Code for the Transport of Dangerous Goods and the Dangerous Substances Act for all States.
- To ensure the disposal of asbestos waste material will be carried out in accordance with the requirements of the Environmental Protection Authority Act for each state.
- To work with government agencies and other stakeholders to develop a transparent relationship to ensure our work is in accordance to the asbestos licence in each state.
- Our staff are fully trained and involved in quality improvement.
- We have the skills and resources to fulfill our customer requirements.
- To provide a health monitoring program for all employees involved with the removal of asbestos.
- To ensure adequate personal protective equipment is available on request.
- Engage a consultative process between management, employees and contractors with the view to maintain management systems and that promote and continually improve performance.
- All work is carried out consistently to a defined standard.
- Conduct reviews and evaluations of our operations to measure compliance by completing audits and inspections.
- Customer satisfaction remains inherent to our business.
- Our customer's requirements have been fully understood and met.
- A professional approach to customer interface is maintained at all times.
- Any complaints are dealt with efficiently and within an acceptable time period.



David McMahon
MANAGING DIRECTOR

Appendix 2 – Container Storage



Container Storage – All Listed Waste, discarded PPE and any other contaminated items are wrapped and fully sealed in approved 200µm approved bags and or approved sealed HD plastic wraps. There is also braces to negate movement of larger items to eliminate any tears or rips.

Once the container is on site it is locked, signed posted and left unopen until disposal at the approved disposal site.



Hook Bin Storage – All Listed Waste, discarded PPE and any other contaminated items are wrapped and fully sealed in approved 200µm plastic sheeting and or approved sealed HD plastic wraps. Bin storage is maintained at a reasonable distance from the fence line.

Appendix 3 – Current signage at both entrances at the Bishop St premises.



Appendix 4 - Key Definitions

ALARP	As Low As Reasonably Practicable
JSEA = SWMS	Job Safety & Environmental Analysis = Safe Work Method Statement
KPI	Key Performance Indicator
OFI	Opportunity for Improvement
PPE	Personal Protective Equipment
RAR	Risk Assessment Register
SDS	Safety Data Sheet
VOC	Verification of Competency
WHSEQ	Work Health Safety Environment and Quality
Worker	Any person engaged to undertake work on site