

# ENVIRONMENTAL PROJECT MANAGEMENT PLAN

**COPY 1/1**

## Waste Collection Works

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Version 3

Issue Date: May, 2022

Prepared by: Nigel Foster

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Date:

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**Amendment History:**

Version 3.0 is current template version of the Company Environmental Project Management Plan Template.

Version 1.1 is the first issue for this project; further changes required for this project requirement are recorded within the table below and or within the *Company Index Register (R-01)*.

Version	Change / Amendment	By Whom	Date
1.1	Nil – First Issue	QHSE Manager	May 2020

<b>Annual Plan Review</b>		
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Date	Comments / Changes	By Whom
May, 2021	Review	QHSE Manager
May, 2022	Review	QHSE Manager

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Distribution List

Issue	Copy	Date	Name	Position and Phone	Date Given
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## 1 Introduction

Moucellis and Sons Pty Ltd implements this Environmental Project Management plan (EMP) to meet EPA obligations whilst undertaking works.

The plan has been developed in accordance with:

- RFT / Scope of works,
- ISO 14001 Environmental Management System Standard, and,
- NT EPA Waste Management and Pollution Control Act / Regs,
- NTG - Standard Specification For Environmental Management Version 2.0.

This plan has been amended to suit the requirements for this project.

## 2 Abbreviations

- Moucellis and Sons – Moucellis and Sons Pty Ltd,
- Client – Business / Company to whom Moucellis and Sons is contracted to,
- EMP – Environmental Management Plan,
- QHSE – Work, Health, Safety, Quality and Environmental,
- SWMS – Safe Work Method Statement,
- NTEPA – Northern Territory Environmental Protection Authority,
- ERP – Emergency Response plan,

## 3 Description of Works

The following type of works have been identified:

- Grease Trap Waste – Collection, Transportation
- Sewage Sludge and residues including nightsoil and septic tank sludge – Collection, Transportation
- Lead, Lead Compounds – Collection, Transportation
- Contaminated Soils – Collection, Transportation, Storage
- Asbestos Removal – Collection, Transportation, Storage
- Waste Mixtures or Waste Emulsions including; Oil and Water or Hydrocarbon– Collection, Transportation.

### 3.1 Location

The location of works is various location throughout the Northern Territory.

### 3.1 Project Signage and Security

Project Signage will be placed where possibility it is identified that there is a possibility that unauthorised personnel will enter areas, and or in high risk foot traffic, residential areas.

Plant and equipment will be parked at the site of works.

Temporary fencing will form the compound and appropriate signage will be placed on the compound fence.

## 4 Working Hours

Hours of operation are 6.30am and 4.30pm Monday / Friday and 7.00am – 12.00pm Saturday.

Hours of operation can be outside these hours due to possible emergency call outs where required, the Project Manager is responsible for ensuring that the required staff attend where required.

## 5 Environmental Policy

Moucellis & Sons will make every reasonably practical effort to conduct our business in an environmentally-friendly way to ensure that we comply with AS/NZS ISO 14001: 2015 and our legislative requirements.

Moucellis & Sons is committed to:

- Establish measurable environmental objectives and targets to ensure continual improvement aimed at the elimination of environmental damage;
- Providing environmental awareness to all contractors, staff and visitors who enter our work places;
- Maintaining or enhancing the services or product provided to customers while simultaneously minimising our resource use and operating costs;
- Achieving compatibility between economic development and the maintenance of the environment to ensure that proper consideration is given to the care of the flora, fauna, air, land, water and the community, which may be affected by our activities;
- Ensuring that we comply with local and State Government legislation pertaining to the operation of the business, in addition to Government legislation and guidelines relating to the impact of the business on the surrounding environment, and in compliance with AS/NZS ISO 14001:2004;
- Minimisation of pollution from our activities;
- Providing a safe and clean environment, and,
- Limiting the impact that the business has on the surrounding environment through the sound and careful management of its activities.

Moucellis & Sons acknowledges the benefits of environmental management and undertakes to fulfil its legal and community duty, by taking all reasonable and practical measures to prevent or minimise harm to the environment. All employees, contractors and visitors are directed to act likewise by exercising due diligence towards the environment in all their activities.

To fulfil this commitment, Moucellis & Sons will observe all environmental laws and promote environmental awareness among all staff to increase an understanding of environmental matters.

Moucellis & Sons also undertakes to notify the relevant authority in the event of a major environmental impact that causes harm, or has the potential to cause harm, to the environment.

This Policy is communicated and understood within the organisation and is available to the public.

**This Policy will be reviewed two yearly**

## 6 Legislative Requirements

Moucellis and Sons has initially cross referenced our internal legislative register, to identify the current legislative requirements for this project as per the RFT / scope of works identifying the legislative requirements for this project contained in the table below.

Accessing all legislative requirements is through the server application **SMARTSHEET**, available at all sites through the use of mobile phones, computers, and or tablets.

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This information will be communicated to all workers through the induction process. Where workers require access to particular information, they should contact the Supervisor or QHSE Manager who will assist them.

Act / Regulations	Australian Standards	Code of Practice
Dangerous Goods Act,	AS/NZS ISO 14001 Environmental Management System,	COP Management & Control of Asbestos in the Workplace
Environmental Assessment Act,	AS/NZS 3500 Plumbing and Drainage	COP How to Safely Remove Asbestos
Northern Territory Work Health and Safety (National Uniform Legislation) Act 2016,	AS/NZS 2444 Portable Fire Extinguishers and Fire Blankets	COP Construction Work
Northern Territory Work Health and Safety (National Uniform Legislation) Regulations 2017,	AS/NZS 3745 Planning for Emergencies in Facilities	COP Managing Risk of Falls at the workplace
NT Aboriginal Sacred Sites Act 2013	AS/NZS 3100 Risk Management Principles and Guidelines	COP First Aid in the Workplace
Environment Protection and Biodiversity Conservation Act,	AS 1319 Safety Signs for the occupational environment	NT Standard Specification Environmental Management 13-14
Soil Conservation and Land Utilisation Act,	AS 1692 Steel tanks for flammable and combustible liquids	COP Employers guide to dealing with workplace bullying
Territory Parks and Wildlife Conservation Act,	AS 1940 The storage and handling of flammable and combustible liquids	COP Employers guide to workers compensation
Water Act		COP Prevention of Falls in general construction
Weeds Management Act.		COP Managing Electrical Risks in the Workplace
Return to Work Act and Regulations		COP Prevention of Falls in general construction
Bushfires Act		COP Hazardous Manual Tasks
Building Act		COP Confined Space
Environmental Offences & Penalties Act		COP Onsite wastewater
Fire & Emergency Act		Guide to managing risks of exposure to Carcinogens in the workplace
Food Act		Managing the risk of hazardous chemicals in the workplace
Heritage Act		NTG - Standard Specification For Environmental Management Version 2.0
Transportation of Dangerous Goods by Road and Rail (National Uniform Legislation) Act		
Waste Management and Pollution Control Act		
Waste Management and Pollution Control Regulations		

### 6.1 Monitoring Legislative Requirements

The QHSE Manager has the responsibility to ensure that all personnel within Mousellis and Sons are aware of their legislative obligations and the need for compliance with these.

Assistance in reviewing legislative requirements is further documented within the **Management Procedures (M-07), Clause 6 Legislative Requirements**.

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To assist in this process, the QHSE Manager retains a library of relevant Quality, Health, Safety and Environmental-related legislation, Australian Standards, Regulations, Codes of Practice and relevant guidance documentation from appropriate authorities.

To ensure the currency of the documentation, the QHSE Manager conducts quarterly checks as a minimum through regularly visiting relevant websites, work health authority alerts and or other mediums, this information is recorded within either the **Company Legislative Register (R-01-I)**, or specific site legislative register contained within the project management plan.

If changes do occur concerning legislative requirements, the company will conduct an internal system review, to ensure that all policies and procedures are accurate.

All personnel are made aware of the availability of the legislative, Codes of Practice and Australian Standards, and the need to retain a clear understanding of their obligations.

This is communicated through but not limited to:

- **Daily Pre-Start Meeting – Start / Stop Card & Visitors Register (F-09-B),**
- **Weekly Site Inspections (F-14),**
- **Monthly Site Audits (F-16),**
- **Lessons learnt (F-26),**
- Notice boards notices,
- Verbal discussions and emails.

Documents that are out of date are either archived or destroyed and replaced with the current version. When required, the company seeks expert advice in Health, Safety, Quality and Environmental areas using the services of external specialists to ensure the highest level of expertise and currency is maintained.

## 7 Licences, Permits and Permissions

Licences, Permits and Permissions required for this project are shown within the below table. Copies of the identified permits/approvals can be located in the site folder. Any Approvals, licences or permits required by the project works are obtained prior to the commencement of works recorded and recorded.

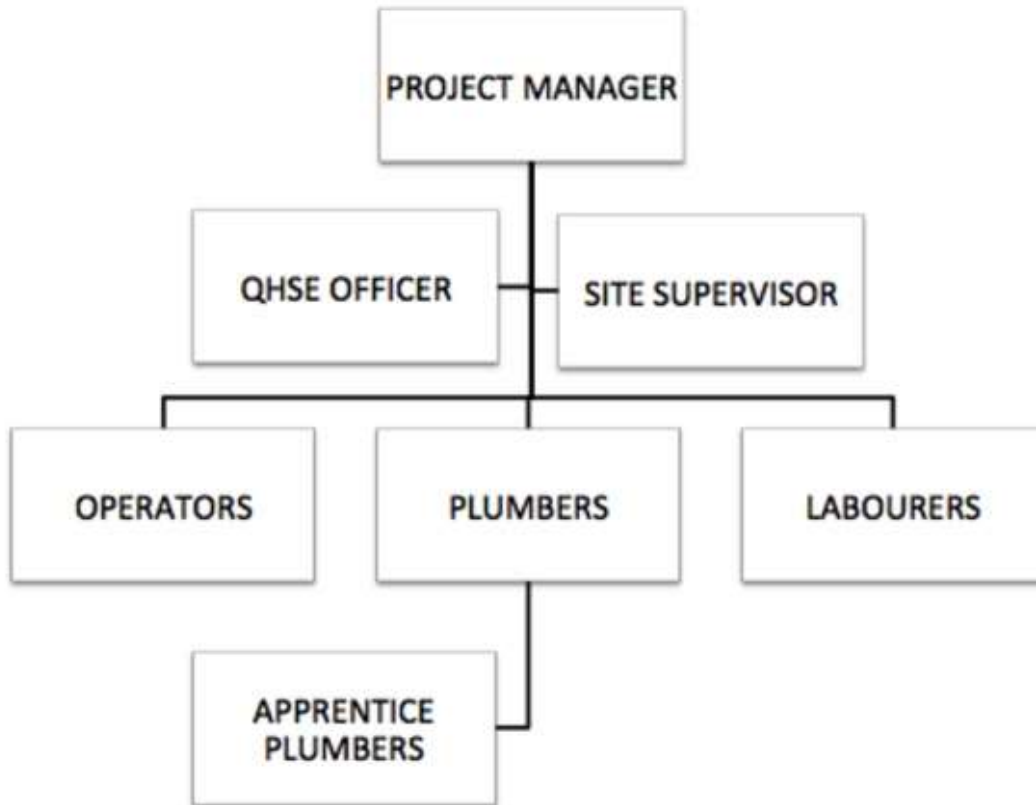
Licence, Permit, Permission	Location of Document	Required	
		Yes	No
Dial Before You Dig	Smart Sheet - Hard Copy in work Folder	Yes	
EPA Licence for removal	Site Folder	Yes	
Permits from the entities with jurisdiction over the land to carry out the works, and/or activities associated with the works, on that land	Site Folder	Yes	
Approval from the Department of Health (DoH) for on-site effluent disposal system. For remote areas certification from a licensed plumber is acceptable	Site Folder	Yes	
Registration with DoH for a camp commercial food preparation area in accordance with the Food Act	Site Folder	Yes	

## 8 Project Objective and Targets

Moussellis and Sons Project Team have established the following Objective and Targets for these works, reviewed on a continual basis for suitability.

Objective	Resources Required	Target / Completion Date	KPI / Monitoring Requirements	Responsible Person/s
Meeting Legislative Requirements	Company Legislative Register	Ongoing	Review PMP Monthly	QHSE Manager / Project Manager
Daily Prestart / Stop Start Card Meetings	Daily Prestart Form	100%	Completed daily	Project Manager
Minimise Environmental Impacts	Spill Kits – Environmental Awareness Training	100%	Inspections – Environmental Incident Reports	Project Manager
Monthly Audits completed	Monthly Audit form Competent personnel	100%	Report received monthly	Project Manager / QHSE Officer, QHSE Manager
Weekly Inspections	Inspection form Competent personnel	100%	Report received weekly	Project Manager / QHSE Officer, QHSE Manager
Close out of non-conformances in a timely manner	Nonconformance Register	100%	Corrective Action Register to have no open non-conformance for more than 30 days	Project Manager / QHSE Officer, QHSE Manager
Inductions completed	Induction register	100%	Induction register personnel registered onsite, matches daily prestart / stop start card name-signatures.	Project Manager / QHSE Officer

## 9 Project Organisational Chart



## 10 Roles and Responsibilities

The senior management teams consist of the General Manager, Project Manager, QHSE Manager, Site Supervisors and any other appointed person subject to the General Manager's discretion.

In the event of a site emergency, all Mousellis and Sons employees are required to assist as per the site emergency response plan.

A **supervisor** could be a staff member, supervisor, operator, and or the General Manager dependant on the site situation at the time of the emergency.

The **supervisor** onsite at the time of the emergency is the responsible person/s.

Title	Responsibilities
<b>10.1 Project Manager</b>	Reporting to the Director
	Assist with the development - review of the project management plan (Health, Safety, Quality and Environmental), emergency plan and evacuation map for the duration of the project in accordance with our HIRAC process.
	Ensure that the site is complying with our Health, Safety, Quality and Environmental management system, legislative requirements and obligations.
	Reviewing / implementing all risk assessments in accordance with our HIRAC process to ensure that they are effective, reviewed and still appropriate for the tasks.
	Conducting company and site-specific inductions and internal training.
	Conduct monthly reviews of the PMP, ERP and other related site documentation.
	Engage and assist in any emergency situations onsite in accordance with site emergency plan.
	Schedule evacuation drills, audits and inspections for the site.
	Ability to act as a supervisor concerning any onsite emergency.
	Conduct onsite IMS audits and inspections.
	Conduct Incident / Accident investigations.
	Ensure that our Objectives / Targets have been met for the project, make adjustments where required in conjunction with the management team.
	Approving subcontractors Health, Safety, Quality and Environmental plans and systems e.g. risk assessments / plans for use onsite.
	Monitoring subcontractor's performance, risk assessment checks (SWMS etc.).
	Preparing the works program for this project.
	Liaise with the client, regulatory agencies regarding requirements for approvals, licenses, permits and authorities and or any nonconformances.
	Monitoring subcontractor's performance, risk assessment checks etc.
	Approving subcontractors Health, Safety, Quality and Environmental plans and systems e.g. risk assessments, for use onsite.
Action corrective actions where required.	
Implementation and maintenance of Environmental actions and controls.	

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Title	Responsibilities
<b>10.2 QHSE Manager</b>	Reports to the Director / Project Manager
	Assist with the development - review of the project management plan (Health, Safety, and Environmental), emergency plan and evacuation map for the duration of the project in accordance with our HIRAC process.
	Ensure that the site is complying with our Health, Safety, Quality and Environmental management system, legislative requirements and obligations.
	Reviewing / implementing all risk assessments in accordance with our HIRAC process to ensure that they are effective, reviewed and still appropriate for the tasks.
	Conduct monthly reviews of the PMP, ERP and other related site documentation for WHSE compliance.
	Engage and assist in any emergency situations onsite in accordance with site emergency plan.
	Schedule evacuation drills, audits and inspections for the site.
	Ability to act as a supervisor concerning any onsite emergency.
	Conduct onsite IMS audits and inspections.
	Conduct Incident / Accident investigations.
	Ensure that our Objectives / Targets have been met for the project, make adjustments where required.
	Inspecting plant and equipment for site requirements.
	Monitoring subcontractor's performance, risk assessment checks (SWMS etc.).
	Review Legislative, Codes of practice, Australian Standards – notify all site managers- supervisors, when required due to changes review the applicable company processes to ensure suitability.
<b>10.3 Site Supervisor / QHSE</b>	Reports to the Project Manager
	Actively practising and developing in their employees and trainee's proper attitudes towards Health, Safety, Quality and Environmental matters.
	Ability to supervise the site in case of an emergency situation concerning any onsite emergency.
	Controlling the risks associated with the work and training that they supervise using our documented HIRAC process.
	Adhering to company policies and procedures.
	Ensuring that all employees, visitors and subcontractors undertake mandatory and recommended training.
	Participating in the investigation of reported incidents and hazards within the area they supervise.
	Attend and participant in all, but not limited to audits, inspections, drills that are required onsite.
	Conducting site-specific inductions regarding company policies, procedures and work instructions.
	Ensuring that all personnel are competent in the operation of machines prior to the commencement of the operation, by conducting skill assessments.
	General Reports to onsite Supervisor and or Senior Management
	Report any accidents / incidents, near misses, to immediate Supervisor or QHSE Officer.
	Comply with all Mousellis and Sons system requirements.

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Title	Responsibilities
10.4 Employees	Attend all required inductions, meetings and training requirements deemed appropriate by Moucellis and Sons.
	Ability to supervise the site in case of an emergency situation concerning any onsite emergency.
	Report any accidents / incidents, near misses, to immediate Supervisor or QHSE Officer.
	Comply with all Moucellis and Sons system requirements.
10.5 Visitors	Comply with all site-specific instructions and rules determined by Moucellis and Sons.
	Never walk around site without being accompanied by an Moucellis and Sons employee.
	Attend all relevant meetings (example: pre-shift meetings).
	Report any, Health, Safety, Quality and Environmental issue to a Moucellis and Sons Onsite Supervisor / Manager or employee to whom they are accompanied by.
	Comply with all site-specific instructions and rules determined by Moucellis and Sons.

## 11 Inductions

Moucellis and Sons understand that induction training is a vital part of ensuring environmental compliance on this project site.

Inductions / training consists of the following, but not limited to:

- Site specific rules for projects,
- **Environmental Management Plans (M-02),**
- Environmental Aspects / Impacts,
- Spill Kits,
- **Emergency Response Plan and Evacuation Map (M-03),**
- **Incident, Accident Near Miss Report / Investigation (F-11),**
- **Project Risk Assessment**
- Company Forms / Tools.

Inductions / Training assists with preventing-minimising the risk of an accident or injury occurring.

Project training needs analysis are conducted against the project requirements this is also recorded within the **TNA / Training Register.**

### 11.1 Visitors Inductions

Visitors are site inducted briefly due to being accompanied at all times around the work site by an authorised Moucellis and Sons employee.

Visitor inductions are conducted verbally and include:

- Notification of the daily hazards,
- Supervisor in charge,

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- Muster point, in case of emergency,
- Who the custodian is for them, and,
- PPE Requirements and Issue.

**Only people who have attended this induction will be permitted onto the job site.**

Visitor inductions are recorded within the **Daily Pre-Start Meeting – Stop / Start Card & Visitors Register (F-09-B)** on sheet.

## 12 Training, Competency and Licences

Dependant on the type of training required for example the site-specific emergency procedures, evidence of attending and understanding the requirements is recorded within the **Training Attendance Register (F-37)**, further evidence of training can be validated by the **Verification of Competencies (VOC- F-21)** developed for high-risk areas.

Further Verification of Competencies (VOC) will be developed if required for any further high-risk work tasks.

External training certificates and / or the signing onto the applicable risk assessments.

Training certificates and records are available to interested parties on request.

### 12.1 Training Needs Analysis (TNA) / Training register

Training needs analysis is conducted through the **Company Training / Induction Register (R-01-C) and Project TNA / Training Register (R-02-C)**, to identify whether the company personnel , subcontractors have the required licences, skills or other training for the positions and or tasks required to complete competently.

Where identified that the person, subcontractor does not have the required training this is identified within the **Company Training / Induction Register (R-01-C) and Project TNA / Training Register (R-02-C)** of what required training is identified, internal Moucellis Personnel are scheduled in for training, and subcontractors are advised that the required training is required to be obtained, no works are allowed to commence until evidence of completion of training is supplied.

Moucellis and Sons retain a copy of all certificates and training achievement for all company personnel.

Subcontractors are required to supply their employee’s qualifications as part of the **Subcontractor Pre-Qualification (F-07-A)** prior to the commencement of works on the project.

### 12.2 PPE Inspection / Maintenance

PPE equipment used by all personnel is initially inspected – visually prior to use.

Maintenance is undertaken as per manufacturer’s requirements, and monitored through various registers including but not limited to:

- Gas Detectors – **Calibration Register (R-01-P)**,
- Harnesses, Lanyards, Anchor Points – **Company Lifting Equipment Register (R-01-S)**.

Maintenance of all equipment is monitored by the QHSE Manager, and taken out of service prior to any expiry date, and / or out of service occurring.



## 13 Communication

The QHSE Manager / Project Manager is the designated 24-hour emergency contact for external authorities. They have the authority to take any action on site as directed by an authorised officer of any relevant external authority.

A Senior Management Representative visits sites on a monthly basis to discuss any Health, Safety, Quality and Environmental issues with site management and personnel.

### 13.1 Opportunity for Change / Improvement

The **Company Hazard / Opportunity Register (R-01-H)** identifies the current categories improvement or change concerning identified hazards, OHS, Quality and Environmental.

The company has identified an improvement as:

- New industry or identified control,
- New process, item which may assist the company in improving.

The Company has identified a change as:

- New industry or identified control,
- Client – external requirements,
- New process / purchased items,
- Engineering Change,
- Process Change,
- Equipment Change,
- Design Change,
- New processes for training / conducting business as per the purchased items.

Change Management is identified through the completion of the **Change Management Request / Approval (F-48)**, completed by the person who has identified the change.

The **Change Management Request / Approval Form (F-48)** is to be forwarded to a senior management team member for completion, approval prior to any new change being implemented.

Further management of change concerning Risk Assessments i.e. **SWMS or other risk assessment** documents are conducted in consultation / participation with the workers, once all parties are satisfied of the steps / hazard and risk controls, all personnel are required to be re-inducted to the SWMS.

Change Management is firstly recorded within the **Company Business Improvement / Change Management Log (R-01-O)** identifying but not limited to; details, identified opportunity or change, purchase of change, potential consequences, adequate resources, integrity of IMS process identified.

Once the **Company Business Improvement / Change Management Log (R-01-O)** item has been approved, the QHSE Manager will then populate the **Company Hazard / Opportunity Register (R-01-H)** where required.

All staff are encouraged to submit ideas that might improve operations, service to clients and client satisfaction.

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Where required or identified as an issue, action further population of the **Corrective Action Register (R-01-G)** may be required with the proposed action to implement the business improvement or rectify the nonconformance, allocating a responsible person and timeframe to close out the action. Any new process identified / actioned is communicated with all personnel, with old information removed from use, by the QHSE Manager.

**13.2 Daily Site Prestart; Stop / Start Meetings**

When personnel working on a project start at the Company Head Office, the Project Manager / Site Supervisor conducts a **Daily Work Allocation Meeting (F-09-A)** prior to the commencement of work. This meeting identifies the location of where personnel are located for the day’s work.

Where the personnel start works at the project location, and not the Company Head Office the project site the **Daily Work Allocation Meeting Record (F-09-A)** form may not be applicable.

When the form is not used the project Manager / Site Supervisor is to ensure that the location of personnel is recorded within the **Daily Pre Start Meeting - Start / Stop Card & Visitors Register / Meeting (F-09-B)** conducted at the project location.

The **Daily Pre Start Meeting - Start / Stop Card & Visitors Register Meeting (F-09-B)** incorporates hazard identification prior to the commencement of the project works, within the **prestart section** including but not limited to Legislative Requirements, Risk Assessments (PRA / SWMS reviews), Audit / Inspection results, Nonconformances, Emergency Response Procedures, and any other Health, Safety, Quality and Environmental issues that may arise.

Further checks to identify any new hazard / risk is identified – recorded within the Stop / Start section of the form.

All personnel working on site are required to attend the Daily Prestart Meeting and acknowledge (sign on) the risk controls for the day’s works.

Where a person has not been able to attend the morning meeting, they are required to read and acknowledge (sign on) to the daily prestart before commencing works to ensure a clear understanding of the risk / controls implemented for the day’s work.

Monthly meetings are conducted using either **Toolbox Meeting (F-10)**, to discuss project progress but not limited to near misses, incidents or accidents, IMS nonconformances, legislative changes, corrective actions, project QHSE / objectives -targets and any other issues or improvements that have been identified during the project.

**13.3 On-Site Communication**

The Project Manager / QHSE Manager (or the Supervisor in their absence) is the contact point for all quality, safety, environment, traffic management issues and emergencies on site.

Daily site meetings are conducted using the **Daily Pre Start Meeting - Start / Stop Card & Visitors Register Meeting (F-09-B)** to discuss any issues raised from the previous day and to ensure the appropriate control measures are in place prior to works commencement for the day.

**Daily Pre Start Meeting - Start / Stop Card & Visitors Register Meeting (F-09-B)** are used at each task location to identify any new hazard / risk.

**Weekly Site Inspections (F-14)** are conducted to identify any new site hazards or issues.

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An appointed senior manager will visit the project sites on a monthly basis to participate in either the site inspection or monthly audit, attendees involved in these site inspections or audits are, but not limited to subcontractors, site personnel, and any other relevant personnel onsite.

The results from the audits are notified to all personnel through the morning daily pre-start meeting or toolbox meeting.

QHSE onsite **Toolbox Meetings (F-10)** are held, at a minimum on monthly basis, to discuss project progress but not limited to near misses, incidents or accidents, IMS nonconformances, legislative changes, corrective actions and any other issues or improvements.

**13.4 External Communication**

The Project Manager / QHSE Manager are the designated 24-hour emergency contacts for external authorities. They have the authority to take any action on any site as directed by an authorised officer of any relevant external authority. In relation to any communication with the **Media** this will be communicated through the General Manager only.

**13.5 Communication with Subcontractors**

Contact names and phone numbers for Subcontractors are available within the company approved **Subcontractor Register (R-01-U)**, kept at the company head office. The Project Manager is the contact person for all subcontractor matters.

**13.6 Complaints**

Any complaints concerning any aspect of the project are registered, investigated and recorded through using our **Corrective Action Report – Investigation (F-12)**.

For documented communications or minor complaints, recordable communication, the communication / complaints register is to be used shows the details and nature of the communication taken place.

Where the complaint, is a nonconformance, the complaint is to be recorded within the **Corrective Action Register (R-01-G)**, recording the complaint, complainant details, and actions taken as a result of the investigation, cross-referencing any other nonconformance reports or other relevant documentation, applicable to the complaint.

If an Environmental complaint (such as a complaint regarding noise or pollution) is received, a written report will be prepared and given to the client representative within one day. This report includes details of the complaint, action taken to correct the problem and proposed measures to prevent the occurrence of a similar incident.

The QHSE Manager / Project Manager ensures that any complaint received is investigated promptly and that appropriate action is taken.

**13.7 Consultation and Participation**

Moucellis and Sons promote the active participation of all employees in Environmental decisions.

Employees, where applicable subcontractors are consulted, given opportunity to participate, and encouragement and training to be proactively involved in Environmental matters affecting the organisation and their work activities.

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Consultation occurs in reference to, but not limited to, the following subjects / topics:

- Hazard identification and risk assessment processes,
- Control measures for the management of Environmental risks,
- Changes to the organisation’s policies and procedures of work routines, which may the Environmental,
- Incidents, near misses, nonconformances, corrective actions and improvements,
- Changes to Environmental Legislation / Regulations,
- Conflicts,
- Appointment of a Health and Safety Committee,
- Current consultation arrangements (Daily Meetings), and,
- Election of Health, Safety, Quality and Environmental and employee’s representatives.

All internal workplace consultations, including but not limited to WHS committee arrangements, are recorded using either our **Daily Prestart -Stop Start Meeting (F-09-B)** or **Toolbox Meeting (F-10)**, internal consultations are conducted at a minimum of weekly basis or as required.

## 14 Subcontractor Management

Moucellis and Sons only engage suppliers and subcontractors who have the correct, but not limited to, valid competencies and experience, insurances to perform the work adequately, in accordance with our **QHS Plan**.

## 15 Environmental Project Operational Control

Project operational control is established appropriately for each activity associated with significant environmental aspects regarding suppliers and including subcontractors.

This is achieved by ensuring appropriate control procedures or work instructions are established and implemented to ensure work is performed in accordance with our environmental policy, aspects / impacts, obligations and established environmental objectives and programs.

## 16 Risk Management Methodology

Moucellis and Sons aims to provide a process to systematically identify hazards, assess each hazard, determine the associated risk level and implement appropriate control measures, in accordance with applicable Australian Standards including ISO 3100 Risk Management Principals and Guidelines.

Moucellis and Sons has established the following processes to enable effective risk management:

- Identifying project site-activity Health, Safety, Quality and Environmental risks / hazards,
- Assessing the risks associated with the project hazards and devising ways to eliminate or minimise the risks,
- Evaluation of training / competency,
- Plant / Equipment Maintenance,
- Environmental Aspects and Impacts,
- Implementing and prioritising control measures following risk assessment and monitoring risk control measures.

The QHSE Manager / Project Manager shall ensure that hazards and risks are satisfactorily assessed, controlled and monitored in accordance with our HIRAC process.

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**16.1 Environmental Assessment of Risks**

Assessment of environmental risks are completed via initial assessment for the project through the Project Risk Assessment and identified environmental aspects / impacts identified in this plan.

The **Daily Pre Start Meeting – Start / Stop Card & Visitors Register- Meetings (F-09-B)** is conducted daily to discuss the daily tasks with management and project personnel to identify if there is any new environmental hazard or risk prior, during the works.

Any environmental hazard or risk is added to the existing completed **Project Risk Assessment (F-01-PRA)**.

**16.2 Risk Matrix**

Consequences					Likelihood				
					5: Almost Certain	4: Likely	3: Possible	2: Unlikely	1: Rare
Quality	Health/ Safety	Environmental	NO		<i>Could occur in most circumstances</i>	<i>May probably occur in most circumstances</i>	<i>May occur at some time.</i>	<i>Could occur at some time.</i>	<i>May occur only in exceptional circumstances</i>
Greater than \$5M in damage or cost	Fatality / Serious permanent disability	Disastrous Impact Long Term Impact, Major Remediation	5	Catastrophic	<b>EXTREME</b> 25	<b>EXTREME</b> 24	<b>HIGH</b> 21	<b>HIGH</b> 20	<b>MEDIUM</b> 15
\$1M - \$5M in damage or cost	Minor permanent disability more than 5 days lost	Serious Impact, medium time frame effect, significant remediation	4	Major	<b>EXTREME</b> 23	<b>EXTREME</b> 22	<b>HIGH</b> 19	<b>MEDIUM</b> 14	<b>LOW</b> 8
\$100K - \$1M in damage or cost	Less than 5 days lost, Major system breach, reportable incident	Moderate impact, short term effect, moderate remediation	3	Moderate	<b>HIGH</b> 18	<b>HIGH</b> 17	<b>MEDIUM</b> 13	<b>MEDIUM</b> 12	<b>LOW</b> 7
\$10K - \$100K in damage or cost	Medical Treatment injury/ Restricted work duties	Minor Impact, reversible impact, minor remediation	2	Minor	<b>HIGH</b> 16	<b>MEDIUM</b> 11	<b>MEDIUM</b> 10	<b>LOW</b> 6	<b>LOW</b> 5
Less than \$10K in damage or cost	Minor Incident / First Aid	Negligible reversible impact, minor remediation	1	Insignificant	<b>MEDIUM</b> 9	<b>LOW</b> 4	<b>LOW</b> 3	<b>LOW</b> 2	<b>LOW</b> 1

<b>EXTREME</b>	<i>(22 - 25)</i> The activity <b>MUST NOT</b> proceed. <b>Stop Work</b> Immediately seek senior management assistance	<b>HIGH</b>	<i>(16-21)</i> The activity <b>CANNOT</b> proceed until additional supervision or use of permit systems has been actioned as required. The controls are to be reviewed by senior management prior to proceeding	<b>MED</b>	<i>(9-15)</i> The activity is to be reviewed by senior management prior to proceeding.	<b>LOW</b>	<i>(1-8)</i> Acceptable risk, activity may proceed with current controls in place.
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### 16.3 Monitoring

Once control mechanisms have been established, regular monitoring takes place through but not limited to:

- **Project Risk Assessments (F-01- PRA),**
- Onsite inspections,
- Compliance with EPA requirements,
- Compliance with AAPA certificate,
- Seriousness of the environmental risk,
- Experience and skill of employees involved,
- Legislative and/or client requirements,
- Supervision,
- Checklists associated with work procedures,
- Witness and Hold Points,
- Incident / accident report-investigation,
- Records or regular auditing, inspections, tests.

### 16.4 Stop Work – Stop / Start Card (Hazard / Risk Reporting)

The **Start Meeting – Start / Stop Card & Visitors Register (F-09-B)** is the first initial hazard / risk assessment that is undertaken prior to conducting any works onsite. Any works that are identified as a High – Extreme Risk where there are no identified controls suitable works, works is to cease, and the Project Manager contacted immediately.

Mousellis and Sons encourage all workers, subcontractors to safety, and Stop work where a high risk – extreme risk is identified with no suitable controls.

Where a new hazard is identified that cannot be controlled either works is to cease, and a further risk assessment is undertaken through either updating the SWMS onsite to ensure that the hazard is controlled, this is conducted by the team onsite.

Where a new step / hazard is identified the document in relation i.e. SWMS will be updated accordingly by the QHSE Manager, with all personnel being able to participate and be consulted in the document prior to implementation, with all person/s undertaking task signed on and where applicable resign onto the updated SWMS.

All Stop / Start Card are to be accessible onsite.

## 17 Environmental Incident Management

All environmental incidents are dealt with promptly to minimise any potential impacts. Likely environmental emergencies and incidents may involve:

- Fuel or chemical spills,
- Unlicensed discharge of pollutants to environment (air, water, noise, soil).
- Dumping of waste to an unauthorised site.

Any Incidents on site, which are likely to cause material harm to the Environment, will be immediately reported to the Client’s Representative using the **Environmental Incident Report / Investigation Form (F-15)**.

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The Environmental Protection Authority (EPA) will be notified of pollution Incidents on or around the site which have occurred in the course of the works, where identified as:

- The actual or potential harm to the health or safety of human beings or ecosystem is not trivial,
- The actual or potential loss or property damage (including clean-up costs) associated with a pollution Incident exceeds \$ 10,000.

## 18 Document and Data Control

Document and data control is to ensure that all employees and subcontractors engaged to carry out activities with Moucellis and Sons use the correct versions of the correct documents for appropriate purposes and ensure that all staff have access to the current issue.

This applies to all types of documents used for references by Moucellis and Sons including, but not limited to, the manual sections, procedures, policies and all other company-related documentation.

The QHSE Manager is responsible for ensuring that the correct version is issued and that records are kept either electronically on **SMARTSHEET** or via hard copies.

### 18.1 Document Controller

Responsibilities of the document controller for all project documents include:

- Creating and maintaining document registers including:
  - A project document register,
  - Registers of copyholders.
- Distributing copies of new and updated documents to registered copy holders,
- Ensuring that out-of-date documents are withdrawn from circulation,
- Keeping documents safe from tampering or corruption,
- Managing and communicate document changes.

Document controllers keep records that demonstrate all intended recipients of documents receive them and have taken appropriate action with out-of-date copies. Controlled copies are delivered using Document delivery record Form.

A Register of controlled copyholders has been established which is located on page 2 of this plan.

### 18.2 Document Issue / Review

Approved copies of company resources are issued within **SMARTSHEET** and available to all staff.

Versions and to whom they are issued are recorded within our manuals.

Company resources are in template format to allow for the online population.

The QHSE Manager / Admin Manager monitors the **SMARTSHEET** for any unauthorised changes to company resources.

Printed copies of documents when distributed are considered as controlled copies.

All electronic copies are considered uncontrolled when printed.

Legibility of documents should be ensured at the time of issue of documents, as well as during all internal audits.

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References to all internal system documents / manuals / forms.

Title	Code
Registers	R
Manual	M
Forms	F
Policies	P

All IMS documentation is reviewed at a minimum of twelve (12) monthly, however the system issue dates will not change where there is no change identified, the system will remain. Regardless, every two years the system will be updated to reflect review being conducted.

Project documentation is continually reviewed for suitability for the client, project requirements, where required the template is updated to suit, and or a new issue is identified.

New issues of documents are communicated throughout the company managers, employees and other person/s utilising the system, with the old issue documents being removed from use, monitored / actioned by the QHSE Manager.

### 18.3 Document Approval

All company system resources including but not limited to, forms, manuals, procedures, policies and all other company-related documentation are developed by an approved authorised Management representative.

Once developed the items are subject to the QHSE Manager / General Manager approval.

### 18.4 External Origin Documents

Standards that are released by external documents are external origin documents; these are controlled and monitored for current issue through conducting regular legislative checks refer **7.1 monitoring legislative requirements**, within this manual.

Other documents that are released by the external agencies, including client supplied plans, designs, drawings, external client policies and procedures are external origin documents.

External origin documents used by Mousellis and Sons require periodic verification of their applicability (current revision status etc.) with the owner.

The QHSE Manager verifies the applicability (current revision status) of these documents with the owner annually and re-affirms the document or revises as necessary.

Where a change has occurred, this is communicated to all Project Management Personnel, through removal of the old version, with replacement of the new version as soon as practically possible within the **Project Design / External Document Register (R-02-I)**.

The Design Methodology within the **Management Procedures (M-07- Clause 07 Design Risk Assessment / Methodology)**, is to be followed in relation to any design change.

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A list of external origin documents and a record of verification is maintained in the *Project Design / External Document Register (R-02-1)*.

External documents used for projects are also identified within the Project management plan when required.

## **19 Control of Records**

The QHSE Manager / QHSE Manager is responsible for ensuring that records are linked to the project or management activity when filed or archived. The files must be filed away either as a hard copy or scanned for electronic copies, allowing for easy access, removal and return to the same filing cabinet, or electronic file.

Records are archived when they have fulfilled their working life and disposed of when no longer required.

All employees with access to the files are equally responsible to ensure the records are kept in an orderly manner and are returned to their proper storage after use.

### **19.1 Access to Records**

Anyone authorised and needing access to records is given full access, through a Project Manager.

Any records removed from the files are carefully looked after and returned as soon as possible to their correct place. Any files that are removed from their normal location are done on a short-term basis only, and the files returned, intact, as soon as possible.

The Project Manager identifies confidential records and ensures that these files are kept in a secure location with defined access.

The Project Manager shall ensure that all internal audits, external audits, management reviews and training records are stored securely and correctly, either in hard copy or electronically within the online company electronic information.

### **19.2 Back-up Electronic Files**

The company backs up files through the use of internal company computers hard drives.

The use of the online platform ensures the backup and safety of data should the computer or building be damaged by fire, for example.

### **19.3 Archive Records**

Archiving should preferably be done on a project basis, after job completion or on an annual basis for business-related files.

Records that are archived include but not limited to; financial, project, legal, personnel, and plant / equipment and health surveillance documents.

When files are considered for archiving, an internal staff member should review the records and seek advice from the Project Manager prior to archiving.

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## 19.4 Retention of Time / Archive Timeframes

Document Type	Retention Time - Years	Method of Retention
Controlled Documents Electronic Copies *	7	Archived in Electronic format and backed up.
Controlled Documents Hard Copies	7	Archived in Office
Environmental Records – General	7	Archived in Office
Exposure to Asbestos	30	Archived in Office
Manufacturer’s Warranty	While current	Archived in Office
Contract/Project Files	10	Archived in Office

## 20 Preventative Action and Corrective Actions

The QHSE Manager in conjunction with the QHSE Officer / Project Manager is to ensure continuing suitability, adequacy, and effectiveness of this Project Management Plan in relation to our Quality, Health, Safety and Environmental contractual obligations and legal requirements.

### 20.1 Preventative Actions

Preventive actions can include but are not limited to:

- Training all company and site personnel to use the applicable preventative measure tools appropriate to the task. The tools should be used prior to conducting activities, or if the activity is of a high-risk nature, in accordance with the company risk matrix,
- Conducting management system internal audits and external audits,
- Conducting onsite inspections and audits,
- Incident / accident reviews and investigations,
- Conducting project risk assessments (PRA),
- Subcontractor evaluations,
- Pre-start machinery and vehicle inspections,
- Plant and equipment risk assessments,
- Ensuring SWMS are in place and accurate prior to machinery activity or high-risk work,
- Ensuring development of further instructions when required including work instructions or safe operating procedures,
- Issuing of lessons learnt alerts,
- Visual inspection of product prior to proceeding,
- Conducting ‘witness and hold points’ as per contractual obligations,
- Ensuring that preventative measures are in place to prevent potential issues of Mousellis and Sons’ business activities in all areas of operation,
- Calibration of equipment for accuracy,
- Ensuring that the Project Manager / QHSE Manager has approved actions used, and,
- Monitoring the potential problem or preventative action put in place is conducted as per timeframe allocated by the appropriate / QHSE Manager to ensure that it is effective.

### 20.2 Nonconformances and Corrective Actions

Nonconformances can be raised for but not limited to, defects, rework, past mistakes, customer complaints, as well as system failures and audit results recorded within the **Company Corrective Action Register (R-01-G)**, occurred through the following actions:

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- By completing a **Corrective Action Report/Investigation (F-12)** or contacting the QHSE Officer / Manager to record the nonconformance in **Company Corrective Action Register (R-01-G)**.
- The root cause of the nonconformance shall be identified and actions taken to prevent reoccurrence of the issues,
- The **Company Corrective Action Register (R-01-G)** will be monitored by the QHSE Officer / QHSE Manager to ensure that the responsible person for the nonconformance has closed out the nonconformance within the timeframe specified.

All nonconformances are encouraged to be raised by our employees, subcontractors without any retribution.

The QHSE Manager is responsible for ensuring that the relevant personnel are assigned with the task of developing the actions required.

This will include an appropriate timeline to be followed for developing and trialling the action items as required.

Any documentation, including amendments to current procedures, forms or additional instructions is prepared for review, and approved by General Manager.

After the General Manager has approved the documents, the QHSE Manager issues the revised documents to all affected personnel, making sure they are aware of the changes.

Incident / Accident nonconformances or corrective actions are recorded in the **Company Incident / Accident Register R-01-F**).

### 20.3 Continual Improvement

All personnel onsite are encouraged to submit ideas that might improve operations, service to clients and client satisfaction or improvements to safety and environmental compliance. This is achieved by filling out the **Corrective Action Report/Investigation (F-12)** and forwarding it to the QHSE Manager.

The QHSE Manager will then populate the **Company Corrective Action Register (R-01-G)** or **Business Improvement / Change Management Log (R-01-O)**, depending on the description detailed within the form, with the purposed action to implement the business improvement or rectify nonconformance, allocating a responsible person and timeframe to close out the action.

### 20.4 Monitoring and Review

The General Manager and QHSE Manager make appropriate arrangements to review and monitor the revised procedures and their implementation to ensure that the expected outcomes are being achieved and that the changes have been effective.

Sufficient time should be allowed for this to be effective. When satisfied the improvements made are working successfully, QHSE Manager will fill in comments in the corrective actions status area **Company Corrective Action Register (R-01-G)**.

## 21 Hazardous Substances and Dangerous Goods

An initial assessment will identify if the substance is hazardous or a dangerous good., through the review of the Safety Data Sheet, and assessment contained in the Substance Register.

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The correct control methods are applied for the use of the substance along with the requirement of health monitoring for hazardous substances as per NT WHS Regulations schedule 14, refer (section 27, pg. 55) and in accordance with our risk methodology.

All hazardous substances brought to our workshop and sites are stored, handled and transported in a manner that meets relevant legislative requirements and minimises the risks associated with the substance.

No products or substances, including chemicals or fibrous materials, are brought to the any site without current safety data sheets.

The **Project Substance Register (R-02-M)** details the specific items used on the project, accessible via onsite electronic devices, storing the identified Safety Data Sheet, for each substance.

**Substance Risk Assessments (F-24)** are conducted on all substances prior to use.

All hazardous chemicals are stored in the original containers with the label intact at all times.

Decanting sometimes will occur due to the volume of the hazardous substance purchased.

The decanting storage device is identified with the appropriate substance labelling on the outside of the container. All containers are stored as per the safety data sheet (SDS) recommendations.

Relevant staff / subcontractors are trained on the applicable hazardous substances they are to use, through the endorsement understanding of the specific **Substance Risk Assessment (F-24)** for each substance and or **SWMS (F-02)** developed.

Spill Kits are located onsite, identified on the **Emergency Response Plan & Evacuation Map (M-03)**.

## 22 Environmental Management

All environmental incidents are dealt with promptly to minimise any potential impacts. Likely environmental emergencies and incidents may involve:

- Fuel or chemical spills,
- Unlicensed discharge of pollutants to environment (air, water, noise, soil).
- Dumping of waste to an unauthorised site.

Any incidents on site, which are likely to cause material harm to the Environment, will be reported immediately to the Client’s Representative using the **Environmental Incident Report / Investigation Form (F-15)**.

The Environmental Protection Authority (EPA) will be notified of pollution incidents on or around the site which have occurred in the course of the works, where identified as:

- The actual or potential harm to the health or safety of human beings or ecosystem is not trivial,
- The actual or potential loss or property damage (including clean-up costs) associated with a pollution Incident exceeds \$ 10,000.

## 22.1 Waste Management Plan

Type of Waste	Locations	Disposal Method
Carboard, Paper	Projects / Office	Onsite Bin
General Waste	Projects / Office	General Onsite Bin
Oils, Filters	Projects	Service centre
Ablution Waste	Projects	Hirer Company

## 22.2 Environmental Project Operational Control

Project operational control is established appropriately for each activity associated with significant environmental aspects regarding suppliers and including subcontractors.

This is achieved by ensuring appropriate control procedures or work instructions are established and implemented to ensure work is performed in accordance with our environmental policy, aspects / impacts, obligations and established environmental objectives and programs.

## 22.3 Identifying Impacts

When determining environmental aspects, Moucellis and Sons considers a life cycle perspective.

This approach is not a detailed life cycle assessment; however, considers, thinking carefully about the life cycle stages that can be controlled or influenced by the organisation is sufficient.

Moucellis and Sons considers the extent of control or influence that it can exert over activities, products and services considering a life cycle perspective.

Typical stages of a product life cycle, with identified control are identified below.

Type	Controls
Raw material acquisition	Controlled through our internal Environmental Policy, Objectives and Procedures
Design	Controlled through our internal Environmental Policy, Objectives and Procedures
Production	Controlled through our internal Environmental Policy, Objectives and Procedures
Transportation / Delivery	Controlled through our internal Environmental Policy, Objectives and Procedures
Use	Controlled through our internal Environmental Policy, Objectives and Procedures
End of Life Treatment	Controlled through our internal Environmental Policy, Objectives and Procedures
Final Disposal	Controlled through our internal Environmental Policy, Objectives and Procedures

The life cycle stages that are applicable will vary depending on the activity, product or service.

## 22.4 Significant Environmental Impacts

Significant environmental aspects are identified within the **Company Environmental Aspects / Impacts Register (R-21)** and further reviewed where applicable using **Project Risk Assessment (F-02)**, **Safe Work Method Statement (F-01)** in conjunction with our HIRAC process, and further monitoring is conducted through the onsite inspections and audits.

In relation to extreme environmental aspects, identification of significant environmental aspects is conducted using the work instruction.

The QHSE Manager and Project Manager review the **Company Hazard / Opportunity Register (R-01-H)**, **Project Risk Assessment (F-02)**, **Safe Work Method Statement (F-01)** to ensure that all significant environmental aspects have been identified and controlled.

## 22.5 Environmental Risk / Controls

Where a risk to the environment has been identified, controls must be introduced to reduce the level of environmental impact acceptable level.

Risk controls can consist of but not limited to:

- Internal environmental awareness induction / training,
- Risks identified within the QHSE Plan with appropriate control measures,
- Review of **Project Risk Assessment (F-01-PRA)**, and update-reassess where applicable,
- Further discussion at the **Daily Pre-Start Meeting – Start / Stop Card & Visitors Register (F-09-B)**,
- **Weekly Site Inspections (F-14)**, and,
- Implementation of new instructions, and training.

## 22.6 Asbestos Management

The company HIRAC process is used to identify the potential asbestos containing material on the project, and determinate the best process, control measures for the management of the asbestos containing materials.

Identifying asbestos is conducted through but not limited to:

- Visual inspection of site (qualified asbestos removal person),
- Copy of the asbestos register for location,
- Identification on material of the item being asbestos,
- Hazardous material surveys.

Where asbestos has been identified within the project works, the asbestos area is to be clearly identified communicated to all onsite personnel.

Prior to any works commencing an asbestos management plan / removal control plan is to be developed and available to all personnel / contractors onsite.

Hazards/ risks identified have controls consistent with our HIRAC process detailed within the **Project Risk Assessment (F-01)** and relevant **Safe Work Method Statement (F-02-SWMS)**, controls are reviewed on a continual basis.

Asbestos Management Plan and Removal Control plans are to be developed by a trained / competent person in accordance with regulatory legislation, packaging, handling, transport and disposal requirements.

Personnel onsite conducting any asbestos works are to be trained, qualified and licenced in accordance with regulatory legislation /specific requirements, codes of practice and Australian Standards, identified within the **Company Training (R-01-C)** and **Project Training Registers (R-02-C)**.

Air monitoring tests are to be completed during and following the asbestos removal in accordance with regulatory legislation /specific requirements, codes of practice and Australian Standards. A clearance certificate is to be issued prior to any new works commencing after any asbestos removal is conducted.

Equipment used for air monitoring is to be calibrated, maintained in accordance with the manufacturer’s requirements.

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Any changes to the plan are to be authorized / signed off on the design change trained / competent person, prior to implementation, communicated to all personnel onsite conducted the works.

Emergency Procedures are detailed within the *Project Emergency Response Plan (M-03)*.

## 23 Environmental Aspects / Impacts

Moucellis and Sons has identified the following aspects / impacts concerning the scope of works relating to the waste collection works, control measure and monitoring techniques are identified within the following:

All environmental complaints are recorded and investigated, as identified within this manual.

23.1 Licenses, Permits and Permissions	
Environmental Risk	Control
Licenses, Permits and Permissions have not been obtained prior to the commencement of works	<p>All permits, licences and permissions to be approved / obtained prior to any works commencing, including but not limited to:</p> <ul style="list-style-type: none"> <li>• NT EPA requirements, licences,</li> <li>• Water Extraction,</li> <li>• Local Councils,</li> <li>• Landowners,</li> <li>• Service authorities, and other approvals required.</li> </ul> <p>Refer to section within this plan for further information. Location of approvals to be accessible for site. All approvals / permits uploaded in <b>SMARTSHEET</b>.</p>
23.2 Noise & Vibration Control	
Environmental Risk	Control
Affected residents and businesses are not notified when work is likely to cause vibration or offensive noise to impact on the public.	<ul style="list-style-type: none"> <li>• All equipment used on site should be in original manufactured condition. Prestart checks completed to ensure all in good working order,</li> <li>• Machinery to be within current service date,</li> <li>• Works to be conducted in the approved onsite hours, hours outside these times are to be approved by the client prior to implementation,</li> <li>• Consultation is to be conducted with affected stakeholders to work out suitable times where required that excess noise is conducted.</li> <li>• Placement of work compounds, parking areas, equipment and material stockpile sites away from noise-sensitive areas.</li> </ul>

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**23.3 Dust and Air Pollution**

Environmental Risk	Controls
Public, community impacted by pollution of works undertaken.	<ul style="list-style-type: none"> <li>• Use Water Truck or other means to keep work areas free of dust</li> <li>• Contain Plant movements to a minimum and do not destroy any more vegetation than is required.</li> <li>• Limit vehicle speeds on unsealed roads /surfaces to control the generation of dust by vehicles</li> <li>• Maintain exhaust and engine systems to reduce emissions,</li> <li>• Do not light large fires. Burning off is not acceptable,</li> <li>• Eliminate Odours and Toxic Gases in live sewer work by ventilation of the work area.</li> <li>• Removal of mud from the wheels and bodies and undercarriages of haulage equipment before it enters public roads or other sealed pavements.</li> <li>• Quick removal of mud split or deposited by the transport of materials on to public roads or other sealed pavements.</li> <li>• Supervisors and key staff including operators shall assess the risks associated with the pollution hazard and take the necessary action from control measures above.</li> <li>• Where a different type of pollution occurs, the QHSE Manager shall be notified and new control measures developed and passed onto the employees by Environmental Instructions through the toolbox meetings.</li> <li>• Establishment of suitable cover crop or provision of other covering over topsoil stockpiles.</li> <li>• Erection of dust screens around stockpiles, and/or spraying of stockpiles with suitable stabilising agents.</li> <li>• Stopping dust generating activities which cannot be adequately controlled by water or other means.</li> <li>• Treating topsoil stripped areas with no scheduled activities within two weeks to prevent dust generation.</li> <li>• Maintaining dust control equipment so that this equipment is available when required.</li> </ul> <p><b>All employees are encouraged to notify supervisors of incidents, or practices that cause pollution of any kind, to allow them to be adequately controlled.</b></p>

**23.4 Storage of Fuels and Chemicals**

Environmental Risk	Control
Storage of fuels / chemicals, and or spills impact environmental	<ul style="list-style-type: none"> <li>• Minimise or eliminate storage on site,</li> <li>• Ensure fully equipped Spill Kit available on site near storage,</li> <li>• Current and tested Fire Extinguisher,</li> <li>• Appropriate Signage,</li> </ul>



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	<ul style="list-style-type: none"> <li>• Spillages should be cleaned up immediately. Clean up materials must be available on site (refer to Work Instruction – Spill Management),</li> <li>• Signage should be displayed in accordance with regulations,</li> <li>• Material safety data sheets must be available for products used on site,</li> <li>• The Waste Management Plan shall be communicated to all employees so that they understand their responsibilities.</li> </ul>
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**23.5 Erosion & Sediment Control**

Environmental Risk	Control
Soil erosion and sediment control, not current or effective.	<p><b>Preventative Measures:</b></p> <ul style="list-style-type: none"> <li>• Site work and the removal of vegetation shall be limited to the smallest area possible,</li> <li>• Prior to commencing work an assessment of the risks and control measures, shall be carried out and recorded in the Project Management Plan,</li> <li>• Regular worksite inspections shall include the identification of any sedimentation being caused, and the efficiency of control measures in place.</li> </ul> <p><b>Control Measures can include:</b></p> <ul style="list-style-type: none"> <li>• Silt traps constructed to slow the flow, collect silt and sediment and minimise erosion,</li> <li>• Provide temporary cut off drains to divert flow from areas without vegetation and where stockpiles are created, or where erosion is likely to occur,</li> <li>• Restoration of vegetation, grass or trees upon completion.</li> </ul>

**23.6 Water Quality**

Environmental Risk	Control
Water quality controls not implemented to prevent any materials entering drain inlets or waterway.	<ul style="list-style-type: none"> <li>• Assess the existing features of the land including the contour, existing vegetation, stormwater drains and drainage pattern, proximity to waterways, soil type,</li> <li>• Program works, where possible, to minimise the impact on the environment e.g. work in waterways in summer,</li> <li>• Install soil erosion and sediment control measures prior to the commencement of works, where possible. Site activities and changes over time will / may necessitate re-assessment of control measures during works,</li> <li>• Program work to limit the extent and duration of exposed earth. This may reduce the number of erosion and sediment control structures required across the site,</li> <li>• Retain vegetation where possible as it minimises exposed surfaces and assists in treating runoff,</li> <li>• Access on site will be limited to designated areas,</li> </ul>

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	<ul style="list-style-type: none"> <li>• Prime, bitumen, concrete and concrete slurry needs to be controlled to prevent it from entering the stormwater system. Stormwater drains need to be protected and spill kits or suitable materials should be available on site to respond to a spill immediately,</li> <li>• Water that appears contaminated, (may have odour or discolouration), should not be pumped until it has been tested and found to meet NTEPA criteria,</li> <li>• Vegetation to remain on site will be handled in accordance with the Flora and Fauna Procedure,</li> <li>• Site rehabilitation will be undertaken in accordance with client requirements. Where this is not specified the site will be revegetated using local seed where possible. Non-native sterile grasses may need to be used for temporary stabilisation while native flora establishes itself,</li> <li>• An assessment should be made during the design phase to ensure that construction will not adversely affect local groundwater quality or flow,</li> <li>• Contaminated groundwater will be handled in accordance with relevant State / Federal regulations. If contaminated groundwater is encountered, then measures will be put in place to try and limit flow into the excavation (i.e. use of sheet piles etc.) The groundwater may need to be disposed of offsite as Prescribed Waste or to sewer under a Trade Waste Agreement with the local water authority (if the contaminant concentrations are within acceptable limits),</li> <li>• Alternative methods of construction may need to be assessed when working in, adjacent to or over waterways, to minimise the impact on the environment.</li> <li>• A Water Quality Management Plan is established and followed.</li> </ul>
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**23.7 Community Relation at the Workplace**

Environmental Risk	Control
Members the public/community have not been notified of the proposed works prior to their commencement, where required.	<p>Instructions on completing works with minimal disruption to the local community.</p> <p><b>Steps:</b></p> <ul style="list-style-type: none"> <li>• Identify from the list of potentially impacted parties who may be impacted by the work being undertaken,</li> <li>• Where possible, work should be undertaken during “normal” hours,</li> <li>• If work is scheduled outside “normal” hours, then the potentially affected residents should be notified in person or by a letter drop,</li> <li>• Letter drops can also be provided to the local NTEPA and council to keep them informed as to the works that are commencing,</li> </ul>

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	<ul style="list-style-type: none"> <li>• The notices should include:             <ul style="list-style-type: none"> <li>- Activities taking place,</li> <li>- Timing,</li> <li>- Duration,</li> <li>- Possible impacts.</li> <li>- Contact number of Contractor’s Representative (including out of hours’ availability):</li> </ul> </li> <li>• In some instances, a letter drop could be used to inform local residents about the work-taking place,</li> <li>• All enquiries or complaints are to be registered on the corrective action report / investigation.</li> </ul> <p><b>Objective:</b> To undertake work with minimum disruption to the needs of the local community. To undertake work without any complaints.</p>
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**23.8 Flora and fauna**

Environmental Risk	Control
Vegetation and Fauna areas not protected, and or possible disturbed.	<ul style="list-style-type: none"> <li>• Assess work area for examples of significant vegetation or evidence of native fauna:             <ul style="list-style-type: none"> <li>- Age of stands i.e. size of trees,</li> <li>- Faunal habitat possibilities i.e. holes in trunks,</li> <li>- Historical European (non-native) trees i.e. Elms.</li> </ul> </li> <li>• Identify any vegetation or fauna you may think is important that has not been identified in the specification i.e. old trees and habitat trees;             <ul style="list-style-type: none"> <li>- If unsure seek advice from experts e.g. Department of Natural Resources.</li> </ul> </li> <li>• Define work and exclusion areas e.g. Fencing, if required.</li> <li>• Assess the design impact on vegetation it may be possible to alter the design slightly to save vegetation.</li> <li>• If native fauna is present or thought to be, seek expert advice from your QHSE Manager.</li> <li>• Ensure all machinery is thoroughly washed down prior to commencing works on site to prevent spread of foreign seed and cinnamon fungi:             <ul style="list-style-type: none"> <li>- Vehicles exiting the site should be clean,</li> <li>- Trucks constantly entering and exiting site should be kept to same route where possible,</li> <li>- Turning points should be within the site works, or planned where no damage will be done to the natural vegetation,</li> <li>- In high-risk areas, client may inspect decontaminated machinery and require testing of material to be imported to site.</li> </ul> </li> </ul>

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**23.9 Weed Management / Cleaning Vehicles and Plant**

Environmental Risk	Control
<p>Noxious weeds are not managed in accordance with the Weeds Management Act, including preventing the spread of noxious weeds through movement of contaminated plant and equipment into un-infested areas.</p>	<ul style="list-style-type: none"> <li>• Consult with Local Council and Department of Environment and Natural Resources Weed Management Branch about management procedures to be implemented where necessary.</li> <li>• All other vehicles have a designated parking area outside the work site.</li> <li>• Ensure all vehicles and plant are high pressure water cleaned removing all earth / soil to prevent the spread of weeds and pest animals before moving them on to and off the works site.</li> <li>• Ensure <b>Plant / Equipment Authorisation Checklist (F-18)</b> has been carried out each day.</li> <li>• Don't use or move materials contaminated with weeds and/or their seeds</li> <li>• Avoid travelling through weeds that are seeding.</li> </ul>

**23.10 General Onsite Waste Management**

Environmental Risk	Control
<p>Waste generated from activities is not sorted nor amounts estimated and recorded.</p>	<p><b>Waste and by Products</b></p> <ul style="list-style-type: none"> <li>• SDS / Substance training,</li> <li>• Regular site inspections,</li> <li>• Provision of appropriate waste containers.</li> </ul> <p><b>General Construction Waste</b></p> <ul style="list-style-type: none"> <li>• Will be taken back to the dump for disposal, or,</li> <li>• Where required, waste generated from maintenance activities will be sorted and amounts estimated and recorded,</li> <li>• All construction waste materials generated on site not able to be recycled will be removed from site immediately and disposed of at appropriate waste disposal facility,</li> <li>• The site will be left in a clean and tidy state on completion of the maintenance works,</li> <li>• Where required records of waste disposed of will be documented as per appendix B, waste register.</li> </ul> <p><b>Concrete Waste</b></p> <ul style="list-style-type: none"> <li>• All concrete waste generated on site will be transported to Moucellis &amp; Sons headquarters for recycling,</li> <li>• Concrete trucks will have a designated area to washout, this area will be cleared and waste removed at the completion of the works on site.</li> </ul>

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**23.11 Fire Management**

<b>Environmental Risk</b>	<b>Control</b>
Uncontrolled burning and impacts on the environmental.	<ul style="list-style-type: none"> <li>• Fire extinguishers available on site within current test date,</li> <li>• Water truck and or hoses available on site,</li> <li>• Cigarette butts will be disposed of in onsite bins.</li> </ul>

**23.12 Environmental Inductions / Training**

<b>Environmental Risk</b>	<b>Control</b>
Personnel not aware of environmental protection requirements for project works	<ul style="list-style-type: none"> <li>• All personnel to be inducted into the site-specific induction, conducted by the Project Manager / Site Supervisor,</li> <li>• Environmental awareness training, Spill kit training</li> </ul>

**23.13 Culture / Heritage Areas**

<b>Environmental Risk</b>	<b>Control</b>
Impact and possible damage to identified heritage sites	<ul style="list-style-type: none"> <li>• Review inventory heritage report (AAPA),</li> <li>• Stop work immediately where a new or possible finding has occurred,</li> <li>• Barricade area off, notify all staff onsite to prevent any further damage,</li> <li>• Notify regulatory authority and client.</li> </ul>

**23.14 Hygiene**

<b>Environmental Risk</b>	<b>Control</b>
Risk to health and hygiene to employees and workers	<ul style="list-style-type: none"> <li>• Wash hands prior to eating,</li> <li>• Ensure that contaminated clothing, boots etc are washed separate to normal clothes</li> </ul>

**23.15 Grease Trap Waste**

<b>Environmental Risk</b>	<b>Control</b>
Grease Trap Waste contamination, spill	<ul style="list-style-type: none"> <li>• Extraction vehicle to be approved by NT EPA for the removal of grease trap waste,</li> <li>• All connections checked prior to any pumping works,</li> <li>• Exclusion zone implemented around areas of pumping,</li> <li>• Spill kit onsite,</li> <li>• Inspection to ensure that the extraction vehicle does not overflow,</li> <li>• Tank checked for any leaks, connections closed – secure prior to transportation,</li> <li>• Disposal of waste at approved facility.</li> </ul>

**23.16 Lead Compounds**

<b>Environmental Risk</b>	<b>Control</b>
	<ul style="list-style-type: none"> <li>• Extraction vehicle to be approved by NT EPA for the removal of lead compounds,</li> <li>• Lead compounds to be identified prior to actual removal,</li> <li>• Exclusion zone implemented around removal area</li> </ul>

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	<ul style="list-style-type: none"> <li>• PPE Gloves, Mask where exposure levels exceed identified levels</li> <li>• Wetting down any areas that may have the potential to create dust</li> <li>• Ensuring that the extraction vehicle is approved by EPA, with the load secure and covered prior to transportation</li> <li>• Disposal of waste at approved facility.</li> </ul>
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**23.17 Asbestos Removal**

<b>Environmental Risk</b>	<b>Control</b>
Asbestos contamination, incorrect method used for transportation, handling, storage	<ul style="list-style-type: none"> <li>• Approved Asbestos removal plan,</li> <li>• All personnel to be wearing correct PPE</li> <li>• Air Monitoring undertaken</li> <li>• Heavy Duty Polythene plastic sheeting used to wrap identified asbestos items</li> <li>• Area to be excluded from any unauthorised persons entering</li> </ul>

**23.18 Waste Mixtures or Waste Emulsions (including oil and water or hydrocarbon)**

<b>Environmental Risk</b>	<b>Control</b>
Contamination of areas	<ul style="list-style-type: none"> <li>• Extraction vehicle to be approved by NT EPA for the removal of mixtures or waste emulsions</li> <li>• All connections checked prior to any pumping works,</li> <li>• Exclusion zone implemented around areas of pumping,</li> <li>• Spill kit onsite,</li> <li>• Inspection to ensure that the extraction vehicle does not overflow,</li> <li>• Tank checked for any leaks, connections closed – secure prior to transportation,</li> <li>• Separation of waste to be undertaken at an approved site where required</li> <li>• Disposal of waste at approved facility.</li> </ul>

**23.19 Contaminated Soils**

<b>Environmental Risk</b>	<b>Control</b>
Contamination of areas, and insufficient storage facility	<ul style="list-style-type: none"> <li>• Area identified prior to removing of soil,</li> <li>• Plant / Equipment to be cleaned down prior to and when leaving site location,</li> <li>• Dust controls – wetting down to be undertaken i.e sprinklers, water truck,</li> <li>• Exclusion zone implemented around removal area to prevent any unauthorised access.</li> </ul> <p><b>Storage:</b> Soil to be bagged in hazi bags and stored in the nominated Storage area. The Storage area is to be bunded, fenced and sheltered from the elements, to ensure that no contaminated soil can be affected by erosion and or contaminate any other areas.</p>

## 24 Audits and Inspections

The QHSE Manager coordinates all audit-related activities associated with the management system.

QHSE system audits are set at regular intervals to ensure all aspects of the system are reviewed.

The frequency of the audits is based on the results of previous audits that include but not defined to nonconformances, accidents and incident trends, injury and illness trends and the significance of individual system activities. The minimum audit cycle is once per calendar year.

Findings from any audit conducted are recorded within the **Company Corrective Action Register (R-01-G)**.

### 24.1 Site Inspections

Site Inspections are undertaken prior, and when to works is completed, to ensure that the areas are free from any environmental impacts from the collection / removal of waste.

## 25 Emergency Response Procedures

Emergency Response Plan is an attachment to this Environmental Management Plan.

The emergency plans containing emergency procedures, contract numbers, evacuation process is located in the supervisor's vehicle.

**Emergency Drills (F-17)** are conducted on a **12 monthly** basis onsite; dependant on the emergency drill findings the drills may become more frequent.

Spill kits are kept within the extraction vehicles or at the work site.

## 26 Attachment A Emergency Response Plan