



# Jabiru Power Station

## Construction Environmental Management Plan

**Version: 0.3**

**Owner: Aidan Davies**

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## 1. Introduction

The purpose of this Construction Environmental Management Plan (CEMP) is to:

- Be consistent with EDL Jabiru Pty Ltd (EDL) processes for environmental management as documented in the EDL Environmental Policy and EDL Australian Environmental Management Plan;
- Inform and influence the performance of construction contractors;
- Provide site-specific measures to comply with obligations unique to the Jabiru Power Station;
- Provide reasonable and practicable measures to comply with obligations under all applicable environmental legislation, and to meet the environmental requirements of all relevant Government Agencies; and
- Provide reasonable and practicable measures to comply with obligations within the Jabiru Power Purchase Agreement, Power Development Agreement and Works Specification.

### 1.1 Objective

The objective of this CEMP is to identify potential impacts and risks associated with environmental aspects of construction of the Jabiru Power Station and to establish management measures to minimise these risks as low as reasonably practical (ALARP).

### 1.2 Scope

This CEMP applies to the construction phase of the Jabiru Power Station, and documents:

- The environmental aspects and impacts (risks) relevant to Jabiru Power Station construction;
- The regulatory and other environmental requirements applicable to Jabiru Power Station construction (recorded as environmental legislative requirements for this CEMP);
- The monitoring and reporting of environmental performance; and
- The response to environmental incidents and emergencies.

The CEMP applies to EDL as well as any construction contractors that are engaged by EDL to carry out construction at Jabiru Power Station.

### 1.3 Document Review Frequency

EDL will manage this CEMP in accordance with the EDL document management system requirements. Approved versions of this document will be managed to ensure the current version is available and that superseded versions are identified or otherwise managed to ensure they are not used for current activities.

It may be reviewed as often as considered necessary and triggers for review include:

- Updates to design;
- Updates or receipt of new licences, agreements or other approvals;
- Changes in environmental legislation that require this document to be revised;
- Environmental incidents or audit outcomes that trigger a revision of current practices; and
- EDL changes that are required to be reflected in this document.

Future changes will be documented in the table below:

**Table 1: Document Revision History**

Item	Details
Operator name	EDL Jabiru Pty Ltd
Current version	1.0
Current document number	HSEQ-125008896-364
Previous document numbers	N/A
Description of changes	Rev 1: CEMP issued for use

## 1.4 Definitions

*Aspects:* An element of the power station activities that can cause environmental impacts. For example, waste and water.

*Impacts:* Any change to the environment, whether adverse or beneficial, wholly or partially resulting from EDL's activities (also known as Consequence in the risk register (Appendix A)).

*Hazard:* A situation or thing that has the potential to cause harm to person / plant / environment / business.

*Cause or contributing factor:* The reason / conditions / context or circumstances that contribute to the hazard.

*Control:* A measure that modifies the risk.

*Risk:* The possibility that harm might occur when exposed to a hazard.

*Environmental harm:* Definitions as per the NT *Waste Management And Pollution Control Act 1998* – Section 4

Environmental harm means:

- (a) any harm to or adverse effect on the environment; or
- (b) any potential harm (including the risk of harm and future harm) to or potential adverse effect on the environment, of any degree or duration and includes environmental nuisance.

## 2. Environmental Legislative Requirements

### 2.1 Sources of obligations

The following sources of obligations exist for Jabiru Power Station construction.

**Table 2: Environmental Obligations**

Document	Stakeholder	Environmental Management Conditions
Jabiru Electricity Supply Project Development Agreement	Northern Territory of Australia	4.3, 4.4, 7.5, 7.7, 7.10, Schedule 2 – Works Specification
Jabiru Power Purchase Agreement (EDL Jabiru Pty Ltd / Power and Water Corporation)	Power and Water Corporation	Nil
Jabiru Power Station Site Construction Licence	Northern Territory of Australia	5

All applicable approvals, licences, notifications and conditions are detailed in the Jabiru Licence Mapping document located in EDL SharePoint. The Northern Territory Government is responsible for obtaining any environmental approvals necessary for commissioning, operating and maintaining the power station.

EDL may receive approvals from the Northern Territory EPA and Department of Agriculture, Water and the Environment at a later time, depending on referral outcomes.

### 2.2 Environmental legislation

A list of environmental legislation relevant to the construction of Jabiru Power Station is in Appendix B.

## 3. Location and Description of the Activity

The Jabiru Power Station locations and descriptions are detailed in Table 3.

**Table 3: Location and Description**

Power Station	Address	Solar	Diesel	Manned / Unmanned
Jabiru	Elsherana Rd, Jabiru NT 0886	X	X	Manned

The key assets associated with the Jabiru Power Station is outlined in the Asset Management Plan. Figure 1 shows the location of the power station.

Figure 1: Location of Jabiru Power Station



Figure 2.2  
Project Location



## 4. Description of the Existing Environment

The existing environmental values of the Jabiru Power Station is described in Table 4.

**Table 4: Description of Existing Environment**

Value	Description
<b>Climate</b>	<p>The Jabiru Power Station is on the outskirts of the town of Jabiru in the West Arnhem region of the Northern Territory. Jabiru experiences distinct wet and dry seasons. The wet season occurs between November and March and the dry season between April and October.</p> <p>Mean min temp: 22.6°C  Mean max temp: 34.3°C  Wettest month (Feb): 363.8mm  Driest month (Jun): 1.1mm  Mean annual rainfall: 1570.8mm</p>
<b>Land</b>	<p>The power station is situated on the Koolpinyah Surface landform, comprising a sandy erosional surface. A basic soil profile has been described and recorded on the NT NR Maps website. This describes the soil as a Kandosol with a loamy sand topsoil to a depth of approximately 150mm and pH of 6. Subsoil is a sandy loam. A small borrow pit exists on the site, indicating gravel and rock is present. The soil is non-dispersive and with a very low risk of acid sulphate characteristics.</p> <p>A search of the NT Environmental Protection Authority's list of Section 14 pollution events showed no pollution events at the power station site. EDL commissioned a baseline environmental survey to determine if there have been any impacts on the land due to neighbouring land uses (landfill to the west and sewage effluent irrigation to the south). The study found that there were no issues of potential concern to health, however there was some evidence of nutrient accumulation along the southern boundary, likely due to spray drift from sewage effluent irrigation. The report is available from the EDL Environmental Library sharepoint page.</p>
<b>Water</b>	<p>There are no drainage lines holding permanent water at the site. The nearest waterway, Barail Creek, is approximately 450m to the southeast. Although the creek is ephemeral, satellite imagery shows many pools of water that are likely to be permanent, at least throughout the wet season.</p>
<b>Vegetation</b>	<p>Vegetation mapping available on the NR Maps website states that the predominant vegetation type on the site is Eucalyptus mid open forest. There are no records of threatened flora occurring on the site.</p> <p>The site is located within Kakadu National Park, however the lot is zoned for utilities and can be developed for that purpose.</p>
<b>Fauna</b>	<p>The site is to be fenced to minimise fauna access. Occasional sightings fauna outside the perimeter are expected. The threatened Black-footed Tree-rat (<i>Mesembriomys gouldii gouldii</i>), Endangered under the EPBC Act, is known to inhabit the site. The Partridge Pigeon (Vulnerable under the EPBC Act) was also detected using the site. No other threatened species have been observed.</p>
<b>Community</b>	<p>The main construction site is approximately 1.6km from the nearest residence. Works along the road corridor to the switchyard will be closer, with a minimum distance of approximately 600m.</p>
<b>Cultural Heritage</b>	<p>Jabiru is located on Mirarr country.</p> <p>The NT Heritage Register contains no registered heritage places near the power station. A survey of the area found one sacred site however this is not within the project area and will not be impacted by the works.</p>

## 5. Environmental Management Structure

### 5.1 Organisational Responsibility

The roles and responsibilities for this CEMP will be in accordance with the EDL Australia Environmental Management Plan.

### 5.2 Environmental Policy

EDL has a corporate Environmental Policy authorised by the EDL Managing Director. A copy of the Environmental Policy is required to be on display at all EDL offices and manned and unmanned power stations.

### 5.3 Environmental Awareness and Training

The following training is conducted by EDL and is applicable to the Jabiru Power Station:

- SAFER: All EDL staff and contractors are required to complete this induction package which includes a module on environmental awareness;
  - EDL spill response training course (depending on their roles and responsibilities); and
- EDL Training and training record-keeping are to be in accordance with the EDL Australian Environmental Management Plan.

Construction contractors will be expected to provide their personnel with training appropriate to their role, as well as informing relevant personnel of their obligations under this plan.

### 5.4 Environmental Incident Management

For all incidents and emergencies, the health and safety of people is the first priority. All environmental incidents / accidents and near misses, regardless of actual or potential severity or magnitude, must be reported via the SAM Events Module within 24 hours of the incident. Construction contractors must report incidents to EDL as soon as reasonably practical.

Management of incidents and emergencies should be undertaken in accordance with:

- Regulators Contact Sheet HSEQ-1610357324-191;
- Jabiru Power Station Emergency Response Plan;
- EDL Event Reporting and Investigation Management Standard (HSEQ-1610357324-147); and
- EDL Australian Environmental Management Plan.

An environmental incident can be any incident arising from any of the power station activities that breaches an environmental performance objective. They can be oil spills, fauna injury, complaints, among others.

An incident reportable to the regulator can be any unplanned event identified as causing “material environmental harm”.

#### 5.4.1 Internal Incident Notification

All environmental incidents/accidents, near misses, regardless of actual or potential severity or magnitude, must be reported via the SAM system within 24 hours of the incident and in line with the Event Reporting and Investigation Management standard – HSEQ-1610357324-147.

#### 5.4.2 External Incident Notification

In case an incident causes or threatens to cause serious or material environmental harm EDL will notify the Northern Territory Environment Protection Authority (NT EPA) pollution hotline on 1800 064 567. The HSEQ team will manage the external notification process taking into account the



Regulators Contact Sheet HSEQ-1610357324-191 and required time frames. Notification will be made to the relevant authority as per the relevant reporting timeframe and using the appropriate notice form after becoming aware of the event.

## 6. Environmental Aspects (Hazards) and Impacts (Consequences) and Management Controls

This section identifies the environmental controls required to minimise the risk of environmental impacts occurring at the Jabiru Power Station to ALARP. All personnel must ensure the management controls are put in place and maintained.

The process of risk identification and assessment is documented in EDL HSE Standard – Risk Management (HSEQ-1610357324-136). That procedure aims to:

- Identify the environmental aspects relevant to the construction activities;
- Identify and consider legal and other obligations in relation to those aspects;
- Identify the impact(s) associated with the aspect; and
- Determine those impacts that have or can be significant in terms of actual or potential impact.

Appendix A provides a summary environmental risk assessment for the Jabiru Power Station construction.

### 6.1 Aspect: Legal / Regulatory

#### 6.1.1 Regulatory Requirements

<b>Risk</b>	Failure to meet regulatory requirements, or contractual conditions.
<b>Objective</b>	Prevent non-compliance.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>• Jabiru Electricity Supply Project Development Agreement</li> <li>• Jabiru Power Purchase Agreement</li> <li>• Jabiru Power Station Site Construction Licence</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>• Where applicable, personnel constructing Jabiru Power Station will have access to the current approvals / permits / and contracts to ensure all Work Risk Assessments / Procedures / Instructions are prepared and maintained to comply with any relevant approval or contract conditions;</li> <li>• All reasonable and practicable measures must be taken to prevent and / or minimise the likelihood of environmental harm being caused;</li> <li>• During commissioning, emissions will be tested to demonstrate alignment with EPA regulations under various conditions: <ul style="list-style-type: none"> <li>○ Between unit's minimum generation and Maximum Continuous Rating (mandatory)</li> <li>○ Range of fuels supplied (if practicable)</li> <li>○ Range of site ambient conditions (if practicable)</li> </ul> </li> <li>• All applicable obligations are detailed in the Jabiru Licence Mapping Register located in EDL SharePoint; and</li> <li>• Compliance with this CEMP, which is to be approved by the NT EPA.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>• Current copies of the licences / approvals are maintained on the EDL Compliance Document Register;</li> <li>• Current version of the PPA is maintained on the EDL RE Commercial Library; and</li> </ul>

	<ul style="list-style-type: none"> <li>Licence Mapping is maintained in EDL SharePoint.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Jabiru Licence Mapping Register;</li> <li>Action register (SAM Events Module);</li> <li>Complaint register (SAM Events Module);</li> <li>Incident register (SAM Events Module); and</li> <li>Compliance Task Register.</li> </ul>

## 6.2 Aspect: Social / Cultural

### 6.2.1 Community Interactions / Proximity to Residential Areas

<b>Risk</b>	Community complaints (due to air emissions, noise, vibration, dust, waste, lighting etc.).
<b>Objective</b>	Prevent occurrence of community complaints due to Jabiru Power Station construction.
<b>Site Licence conditions</b>	<ul style="list-style-type: none"> <li>TBA</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>Jabiru Power Station is situated approximately 1.6km from the nearest residential or community areas;</li> <li>The construction site is not accessible or visible to the public;</li> <li>Where practical, the construction site will be fenced and screened to prevent observation by the public;</li> <li>Lighting will be the minimum wattage practical, pointed down, with shields where necessary to minimise light spill;</li> <li>Local businesses will be used wherever practicable in the conduct of environmentally relevant activities;</li> <li>Vehicles and plant will be maintained in good order to ensure emissions do not cause nuisance to nearby residents and businesses;</li> <li>Section 6 of this CEMP; and</li> <li>In the event a community complaint is received, EDL will manage any complaints as per the HSEQ Standard "Stakeholder Responsiveness Issues Management and Complaints Handling Procedure" HSEQ-1610357324-549 and via the SAM Events Module.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>No complaints recorded in the complaints register.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection checklist;</li> <li>Complaint register (SAM Events Module); and</li> <li>Action register (SAM Events Module).</li> </ul>

### 6.2.2 Cultural Heritage

<b>Risk</b>	Loss of Cultural Heritage.
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<b>Objective</b>	Avoid disturbance of items of potential significance and protect the cultural heritage of the Mirarr people.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Condition 7.10)</li> </ul>
<b>Management Controls)</b>	<ul style="list-style-type: none"> <li>EDL must comply with the conditions of any cultural heritage approvals provided by the NT Government;</li> <li>The Gundjehmi Aboriginal Corporation (GAC) are to be invited to perform or arrange a welcome to country ceremony at the commencement of works. EDL will acknowledge the traditional ownership of the land by the Mirarr people;</li> <li>The Gundjehmi Aboriginal Corporation are to be invited to provide cultural heritage induction material to EDL personnel and contractors prior to works commencing;</li> <li>There are no known items of cultural significance at the Jabiru Power Station, however as a prudent measure, if an item of potential Aboriginal heritage or cultural value is discovered, the area will be restricted as far as it is reasonable and practicable to do so, and the discovery reported to the Project Manager and the Environmental Manager. The discovery will be discussed with the GAC to determine how to proceed;</li> <li>There is one known Sacred Site just outside the project area. Personnel are not permitted to travel or disturb any land or vegetation that is off the approved disturbance area;</li> <li>EDL personnel are not permitted to liaise in any form with any local aboriginal communities or other third parties regarding heritage on site. Communications are to be directed to the Project Manager; and</li> <li>If bones are discovered and there is a possibility that they are human, the police will be contacted.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>Any discovery event is raised as an incident in the SAM Events Module; and</li> <li>If bones are discovered and there is a possibility that they are human, the police are contacted.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Incident register (SAM Events Module); and</li> <li>Action register (SAM Events Module).</li> </ul>

### 6.3 Aspect: Air Emissions

#### 6.3.1 Dust Generation

<b>Risk</b>	Dust from EDL works reducing air quality or local amenity.
<b>Objective</b>	Minimise dust production.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Works spec condition 2.4.1)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>The construction site is not in close proximity to houses and remnant vegetation between the site and residences or business is expected to be an effective screen;</li> </ul>

	<ul style="list-style-type: none"> <li>Complaints will be recorded in the complaint register and investigated;</li> <li>Site Monthly HSE Construction Inspection is undertaken to identify any excessive dust conditions;</li> <li>Materials and earthworks will be effectively covered where susceptible to dust production;</li> <li>Main access tracks will be compacted and gravelled;</li> <li>Dust suppression will be applied when necessary;</li> <li>All EDL employee and contractor vehicles remain on roads where possible.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>No complaints received regarding dust.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection;</li> <li>Action register (SAM Events Module); and</li> <li>Complaint register (SAM Events Module).</li> </ul>

## 6.4 Aspect: Waste

### 6.4.1 Waste Management

<b>Risk</b>	Incorrect waste storage, handling or disposal; and Incorrect listed waste reporting or record keeping.
<b>Objective</b>	Appropriate storage, disposal, reporting and record keeping of all power station waste.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Works spec condition 2.4.1)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>Waste streams will be segregated by categories; listed waste, recyclable and non-recyclable wastes. Waste will be managed and disposed of in a manner consistent with the most regulated element of the waste stream. Wastes include liquid wastes, such as waste oil and oily water;</li> <li>The preferred options for disposal are: <ul style="list-style-type: none"> <li>Recyclable General Waste: Recycled.</li> <li>General Waste: Landfill.</li> <li>Listed: Disposal to a licensed disposal agency using a licensed listed waste transporter;</li> </ul> </li> <li>Prior to off-site disposal, all wastes shall be in nominated and identifiable waste containers. These containers shall be labelled, stored and maintained to restrict any access by stormwater and contain any leak or spill of contents;</li> <li>Waste bins are to be lidded to prevent wind-blown litter;</li> <li>Due to proximity to the Jabiru landfill, there may be pre-existing litter on the site. Litter is to be cleaned up during construction, and any pre-existing litter that may have caused contamination of the land must be photographed and reported to the Environmental team;</li> </ul>

	<ul style="list-style-type: none"> <li>Waste containers are to be located in a suitable area;</li> <li>Listed wastes (for example oily rags and drums with oily residue) are to be kept separate from general waste and banded until removal to a Darwin facility;</li> <li>Contaminated material (soil or spill kit materials) is to be placed in a suitable container and removed from site by a licenced contractor;</li> <li>All wastes must be removed from site in a timely manner, to a Darwin disposal facility. The Jabiru landfill is not to be used for general waste disposal;</li> <li>Excavated materials and construction waste may be disposed at the Jabiru landfill subject to federal and NT EPA approvals (to be confirmed);</li> <li>All listed waste removed from the power station will be removed by a person who holds a current authority to transport such wastes;</li> <li>Listed waste transporters are to provide copies of Waste Transport Certificates and Certificates of Disposal for each consignment;</li> <li>Where possible, printing of paper will be avoided to reduce unnecessary paper wastage;</li> <li>Site Monthly HSE Construction Inspection is undertaken to identify any inadequate waste practices; and</li> <li>Waste training is delivered through the SAFER training module.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection documents appropriate waste practices are being followed; and</li> <li>All listed waste tracking is recorded as required.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection checklist;</li> <li>EDL induction and training records;</li> <li>NT Waste Tracking Register;</li> <li>Action register (SAM Events Module); and</li> <li>Pronto Work Orders.</li> </ul>

## 6.5 Aspect: Chemical

### 6.5.1 Chemical Storage and Handling

<b>Risk</b>	Release of chemicals to environment (air / water / soil).
<b>Objective</b>	Prevent the release of chemicals on site causing environmental contamination.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Condition 3.3.2)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>A manifest is to be maintained for chemicals (including hazardous substances and dangerous goods) stored;</li> <li>Any chemical to be used by EDL will require approval using the ChemAlert System;</li> <li>All chemicals stored at the power station will be stored and used in accordance with Safety Data Sheet (SDS) requirements;</li> <li>Chemical storage will:</li> </ul>

	<ul style="list-style-type: none"> <li>• Be kept in good condition and be able to contain any solid or liquid leak or spill;</li> <li>• Be designed to contain at least 110% of the volume of the largest storage vessel and at least 25% of the total volume stored;</li> <li>• Be placed away from drainage lines;</li> <li>• Be placarded in accordance with the requirements (as relevant) of the Safety Data Sheet (SDS) for the product;</li> <li>• Contain only chemically compatible items and segregated from areas of incompatible Dangerous Goods Classes; and</li> <li>• Have a spill kit (or other response measures) and procedures available in the event of a spill or leak.</li> </ul> <ul style="list-style-type: none"> <li>• The contents of any container found to be damaged and potential result in a leak or spill will be transferred to another suitable and sound container;</li> <li>• Spill response equipment will be located at all refuelling and liquid chemical storage locations including refuelling trucks;</li> <li>• All required EDL employees undergo spill response training in the EDL training portal; and</li> <li>• Any spill is managed as per the EDL Spill Response Procedure (HSEQ-1610357324-539), located on SharePoint.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>• ChemAlert register for the power stations is up to date;</li> <li>• EDL's Site Monthly HSE Construction Inspection confirms: <ul style="list-style-type: none"> <li>○ The currency and location of SDS summaries;</li> <li>○ The appropriateness of chemical storage within the power station;</li> <li>○ Chemical segregation;</li> <li>○ The adequacy of bunding;</li> <li>○ The condition and stock levels of spill kits; and</li> <li>○ There is no leaking from or damage to any bunding on site.</li> </ul> </li> <li>• Any spill to ground is cleaned up in accordance with the Spill Response Procedure and reported as an incident in the SAM Events Module; and</li> <li>• Training records indicate that all required employees and contractors have undergone the EDL Environmental Training modules.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>• ChemAlert System;</li> <li>• EDL induction and training records;</li> <li>• Site Monthly HSE Construction Inspection;</li> <li>• Incident register (SAM Events Module);</li> <li>• Action register (SAM Events Module); and</li> <li>• Pronto Work Orders.</li> </ul>

## 6.6 Aspect: Water

### 6.6.1 Surface Water

<b>Risk</b>	Release of contaminated site water to surface water, including stormwater drains.
<b>Objective</b>	Prevent contamination of surface water.
<b>Licence Conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Condition 3.3.2)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>All required EDL employees undergo spill response training in the EDL training portal;</li> <li>The timely clean-up of any leak or spill on site must not allow the spill / leak to be washed into any stormwater drain or water body (see EDL Spill Procedure);</li> <li>The design will ensure minimal disturbance to natural waterways;</li> <li>Contaminated water, such as oily water must be managed as a waste in accordance with 6.4.1 – Waste Management;</li> <li>A specific erosion inspection is to be undertaken after rainfall events over 10mm in 24 hours (using Jabiru Airport BOM station data);</li> <li>Erosion and sediment controls to be maintained as per the approved design; and</li> <li>Stormwater design will be conducted by a suitably qualified person to ensure overland flows are maintained as close to natural flows as possible, and not exceeding pre-development flows (10 year ARI and 100 year ARI).</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>Any spill to ground is cleaned up in an appropriate and timely manner and report as an incident in the SAM Events Module (see EDL Spill Procedure);</li> <li>Site Monthly HSE Construction Inspection and after-rain inspection documents any evidence of erosion or contamination of drainage lines; and</li> <li>Site Monthly HSE Construction Inspection documents actual / potential leaks or spills to ground.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection;</li> <li>Incident register (SAM Events Module); and</li> <li>Action register (SAM Events Module).</li> </ul>

### 6.6.2 Ground Water

<b>Risk</b>	Release of contaminants to groundwater.
<b>Objective</b>	Prevent contamination of groundwater.
<b>Licence Conditions</b>	Nil.
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>Chemical bunds are regularly inspected to ensure integrity and capacity;</li> <li>Spills and leaks on the ground are cleaned up as they occur (see EDL Spill Procedure); and</li> </ul>

	<ul style="list-style-type: none"> <li>Contaminated water, such as oily water must be managed as a waste in accordance with 6.4.1 – Waste Management.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>Any spill to ground is cleaned up in an appropriate and timely manner and report as an incident in the SAM Events Module (see EDL Spill Procedure); and</li> <li>Site Monthly HSE Construction Inspection documents actual / potential leaks or spills to ground.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection;</li> <li>Incident register (SAM Events Module); and</li> <li>Action register (SAM Events Module).</li> </ul>

## 6.7 Aspect: Soil / Land

### 6.7.1 Soil Contamination

<b>Risk</b>	A release of liquid chemicals or waste water to ground resulting in soil contamination.
<b>Objective</b>	Avoid contamination of soil due to release of liquid chemicals and / or wastes.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Condition 7.7)</li> <li>Jabiru Power Station Site Construction Licence (Condition 5)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>All liquid chemical storage and handling to be managed as per 6.5.1 Chemical Storage and Handling to minimise release of chemicals to ground;</li> <li>The site displays Emergency Response Procedures which contain the EDL Spill Response Procedure (HSEQ-1610357324-539);</li> <li>The timely clean-up of any leak or spill on site must ensure all contaminated gravel and soil is collected (see EDL Spill Procedure);</li> <li>The waste collected from any leak or spill of these substances must be disposed of as outlined in Section 6.4.1 – Waste Management;</li> <li>All required EDL employees undergo spill response training in the EDL training portal; and</li> <li>Contaminated water, such as oily water must be managed as a waste in accordance with 6.4.1 of this CEMP.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>EDL's Site Monthly HSE Construction Inspection documents spill observations within the power station; and</li> <li>Any spill to the ground is cleaned up in an appropriate and timely manner and reported as an incident in the SAM Events Module (see EDL Spill Response Procedure) and the Actions Register shows any further required action.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection checklist;</li> <li>Incident register (SAM events module);</li> </ul>



	<ul style="list-style-type: none"> <li>Action register (SAM Events Module); and</li> <li>Pronto Work Orders.</li> </ul>
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## 6.7.2 Soil Stability

<b>Risk</b>	Soil erosion and sediment loss caused by lack of ground cover.
<b>Objective</b>	Appropriate land management to prevent soil erosion and sediment loss.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Condition 2.4.4.5, 2.4.7, 3.3.2)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>Construction is to be conducted in accordance with APPENDIX C: Soil and Water Management Plan;</li> <li>Topsoil will be stripped to 100mm maximum (taking care not to strip subsoil) prior to heavy disturbance of the site and stockpiled along the high side of the construction area;</li> <li>Topsoil will be kept separate from subsoil and the two will not be mixed;</li> <li>The thermal power station site will be gravelled to improve stability;</li> <li>Access tracks will be maintained and the main access to site will be compacted with gravel;</li> <li>Topsoil will be spread back across non-operational areas and batters as part of rehabilitation;</li> <li>The design will retain adequate soil cover over the tracker foundations;</li> <li>Clearing will be conducted at the latest practical time, between October and July, to avoid extended periods of disturbed soil and to avoid the wet season; and</li> <li>The Site Monthly HSE Construction Inspection prompts operators to visually check for site stability (erosion or loss of soil) across the site;</li> <li>Twice-weekly rehabilitation inspections are to be conducted to ensure ground cover is adequate and to identify any need for repairs or cleanout of sediment traps, until such time as the construction area is fully revegetated and stable.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection documents erosion observations within the power station;</li> <li>If erosion is identified it is entered into the Action Register then tracked to completion; and</li> <li>The SAM Complaint register will record any complaints received due to erosion.</li> </ul>
<b>Person Responsible</b>	Operations Manager and Operations Supervisor.
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection;</li> <li>Action register (SAM Events Module);</li> <li>Complaint register (SAM Events Module); and</li> <li>Pronto Work Orders.</li> </ul>

## Appendix 1

## 6.8 Aspect: Noise / Vibration

### 6.8.1 Noise Generation

<b>Risk</b>	Noise exceeding regulatory or PPA limits.
<b>Objective</b>	Prevent non-compliance and complaints.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>• Jabiru Power Purchase Agreement (Schedule 6.13)</li> <li>• Jabiru Electricity Supply Project Development Agreement (Works Spec condition 2.3.6.1, 4.5.1)</li> <li>• Jabiru Power Station Site Construction Licence (Condition 5)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>• The construction site is located approximately 1.6km from the nearest residence, and major noise impacts are not expected;</li> <li>• Noise modelling is being conducted to estimate whether the station will be audible to any businesses or residents under any conditions. Preliminary results suggest that normal operations will not be audible over background noise even in adverse conditions. Construction modelling is yet to be completed;</li> <li>• Deliveries and heavy vehicle movements are to be scheduled within between 0600 and 1800 hours to minimise traffic noise impacts on the community;</li> <li>• Night works will not be required and night driving will be minimised;</li> <li>• Subject to other constraints, clearing and construction will be undertaken as rapidly as safely practical to minimise noise impacts;</li> <li>• Mobile plant chosen for the project will be equipped with broadband rather than tonal reversing alarms where practical;</li> <li>• Generators are to be fitted with industry standard mufflers to reduce noise output;</li> <li>• Noise monitoring is to be carried out during the Reliability Test to establish the power station's noise output and compliance with noise limits in accordance with the NT Noise Management Framework Guideline; and</li> <li>• Noise monitoring to be carried out as necessary following a complaint or direction from the regulator.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>• No complaints received regarding noise; and</li> <li>• When tested, noise levels meet PPA requirements.</li> </ul>
<b>Person Responsible</b>	Operations Manager and Operations Supervisor.
<b>Records</b>	<ul style="list-style-type: none"> <li>• Noise reports (Teambinder);</li> <li>• Action Register (SAM Events Module); and</li> <li>• Complaint register (SAM Events Module).</li> </ul>

## 6.9 Aspect: Biological

### 6.9.1 Fauna

<b>Risk</b>	<ul style="list-style-type: none"> <li>Wildlife on site may be injured or killed;</li> <li>Wildlife onsite may cause injury to personnel (e.g. snake bite); and</li> <li>Pest species infestation.</li> </ul>
<b>Objective</b>	Minimise negative interactions with fauna.
<b>Licence conditions</b>	Nil.
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>Clearing will be undertaken progressively from south to north to allow fauna to escape into adjacent land. Fences will be opened prior to clearing to encourage escape of animals;</li> <li>Djurrubu Rangers will be engaged to check vegetation, hollows and logs for animals immediately prior to clearing;</li> <li>If practical, traps will be set for Black-footed Tree-rat in the days leading up to clearing. This will only be undertaken if suitable release habitat well away from the power station is identified in order to prevent re-colonisation;</li> <li>Removal or burning of fallen vegetation will take place within 24 hours of clearing to minimise the risk of animals taking shelter within the stockpile;</li> <li>In the event of arboreal animals being found prior to clearing, other sections of the area will be cleared. The animal will be allowed to self-relocate overnight;</li> <li>If the animal does not relocate itself, the Environment Manager must be contacted for advice;</li> <li>Sightings of threatened species (including Black-footed Tree-rat and Partridge Pigeon) are to be recorded in SAM (as a Report Only event) to form a fauna register;</li> <li>After clearing, fences or other barriers will be maintained for general security and to restrict the access of fauna to site plant and equipment;</li> <li>Vehicle speed on site will be restricted to 20 km/hr by EDL and contractor vehicles;</li> <li>Vehicle speed on public roads must be as signed, and driving at dawn and dusk is minimised;</li> <li>Excavations will be closed as soon as practical to minimise the risk of fauna entrapment;</li> <li>Excavations will be checked each morning for trapped fauna;</li> <li>Where trapped or injured fauna is found on site, call Wildcare on 89 886 121;</li> <li>EDL contractors and employees are not permitted to attempt to handle dangerous fauna such as snakes. Where possible allow the snake to self-relocate. If this is not feasible, a snake catcher can be contacted on 1800 453 210;</li> <li>Waste is to be appropriately managed onsite to minimise attracting pest species and their predators (i.e. mice and snakes). Bin lids are to be kept closed and open bins secured with nets; and</li> <li>Pest species will be managed as required by suitably qualified personnel.</li> </ul>

<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>In the event fauna is injured or killed because of construction activities, an environmental incident is raised in the SAM Events Module;</li> <li>Pest species management is conducted as required; and</li> <li>In the event personnel is injured because of a wildlife interaction appropriate medical treatment is administered and an incident raised in the SAM Events Module.</li> </ul>
<b>Person Responsible</b>	Operations Manager and Operations Supervisor.
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection;</li> <li>Action register (SAM Events Module); and</li> <li>Incident register (SAM Events Module).</li> </ul>

## 6.9.2 Weeds

<b>Risk</b>	Weed infestation or spread at power station.
<b>Objective</b>	Appropriately manage weed species.
<b>Licence conditions</b>	Nil.
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>All EDL and contractor vehicles will avoid driving through any observed areas of declared weeds;</li> <li>All vehicles and personnel are to remain on cleared areas;</li> <li>Personnel must ensure vehicles are clean and free of weeds prior to arriving on site, with a weed declaration form;</li> <li>Clearing or earthmoving equipment that works on another uncleared area must be re-cleaned and certified prior to mobilising back to the Jabiru Power Station site;</li> <li>Prior to clearing, the site will be inspected for declared weeds and Weeds of National Significance (WoNS). These weeds will be removed and disposed in accordance with best practice techniques;</li> <li>Personnel are to clean clothing and boots of any dirt and organic matter prior to entering site;</li> <li>EDL conducts Site Monthly HSE Construction Inspections, which include sighting of weeds within the power station area;</li> <li>Assurances are obtained from any landscaper or other company engaged by EDL to introduce any soil or fill material that the material is weed and pathogen free; and</li> <li>If any Class A or Weeds of National Significance are found within the power station areas EDL will coordinate and address weed eradication. The finding will be reported to the Weed Management Branch.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection documents presence of weeds; and</li> <li>Weed management is undertaken.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Site Monthly HSE Construction Inspection checklist;</li> <li>Incident register (SAM Events Module);</li> </ul>

	<ul style="list-style-type: none"> <li>Action register (SAM Events Module); and</li> <li>Complaint register (SAM Events Module).</li> </ul>
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## 6.9.3 Flora

<b>Risk</b>	Negative impact on native or protected flora.
<b>Objective</b>	Appropriately manage native or protected flora.
<b>Licence conditions</b>	<ul style="list-style-type: none"> <li>Jabiru Electricity Supply Project Development Agreement (Works spec condition 2.4.1)</li> </ul>
<b>Management Controls</b>	<ul style="list-style-type: none"> <li>The area to be cleared is to be clearly marked by pegs and/or flagging in addition to the use of GPS guidance where practical;</li> <li>Remaining vegetation will become a no-go zone;</li> <li>Clearing will be kept to the minimum practical amount required for construction of the power station;</li> <li>Burning of timber is prohibited unless done in accordance with a permit and with notification to West Arnhem Regional Council, JKL and GAC. Burning to be conducted in strict accordance with the conditions of the permit;</li> <li>Suitable logs will be selected and reserved for habitat enhancement;</li> <li>Nest boxes will be installed in nearby habitat prior to clearing to enhance sheltering resources for Black-footed Tree Rat;</li> <li>Remaining cleared timber will be stockpiled away from standing vegetation and burned as soon as practical;</li> <li>Smoking is prohibited on site except for in a designated smoking area clear of vegetation;</li> <li>Vehicles must not be allowed to idle in areas that have not been cleared of vegetation;</li> <li>A 5 metre firebreak will be maintained on the internal boundary for the duration of the project;</li> <li>Appropriate fire extinguishers must be available to use on small fires. If unable to be immediately extinguished, the Emergency Response Plan must be initiated;</li> <li>Clearing will be conducted at the latest practical moment to enhance soil stability;</li> <li>Rehabilitation will be conducted in the solar farm area and any areas disturbed by construction that are not needed for operations (e.g. laydown); and</li> <li>Rehabilitation will comprise shaping the ground to a stable landform and sowing a suitable native ground cover for soil stability. Natural regeneration will be used to minimise the risk of altering species diversity.</li> </ul>
<b>Measurement Criteria</b>	<ul style="list-style-type: none"> <li>Clearing is conducted only within the designed and approved area.</li> </ul>
<b>Person Responsible</b>	Project Manager
<b>Records</b>	<ul style="list-style-type: none"> <li>Management of Change (MOC) documentation.</li> </ul>

## 7. Environmental Monitoring and Reporting

### 7.1 Environmental Monitoring

Environmental monitoring is completed via monthly environmental inspection of the Jabiru Power Station construction works using the EDL Site Monthly HSE Checklist Inspection. This task is completed by the Project Manager and/or an on-site HSE Advisor.

This checklist contains specific fields to verify controls and it is stored within the EDL SharePoint system. Any actions are recorded and tracked in the EDL Action Register.

Noise monitoring will be undertaken as required to verify compliance with project obligations, in response to a complaint or as requested by the regulator.

Environmental monitoring must be carried out by suitably qualified people using equipment that is maintained and calibrated in accordance with manufacturer specifications. Any laboratory analysis must be conducted by a laboratory that has National Association Testing Authorities (NATA) certification for the test.

### 7.2 Reporting

Key approval reporting requirements are summarised in Table 5.

**Table 5: Reporting Requirements**

Item	Approval	Requirement	Government Department	Timing
Regulator Reportable Incident	NT Government Jabiru Work Specification	Duty to notify of a Section 14 incident (which causes or threatens to cause material or serious environmental harm). The notification should include: <ul style="list-style-type: none"> <li>• Details of the reportable incident;</li> <li>• The cause of the incident</li> <li>• Details of the pollution that is occurring; and</li> <li>• Attempts made to prevent, reduce, control or clean up the pollution.</li> </ul>	NT EPA	Within 24 hours of becoming aware of the incident
Duty to notify CEO of incidents	NT Environmental Protection Act 2019	The CEO must be notified of an incident and all prescribed information about the incident which causes or threatens to cause material or serious environmental harm. <ul style="list-style-type: none"> <li>• the time, date, nature, duration and location of the incident;</li> <li>• the location of the place where the environmental harm is occurring or is likely to occur;</li> <li>• the nature, the estimated quantity or volume and the</li> </ul>	NT EPA	As soon as practicable (and in any case within 24 hours after becoming aware of the incident).

Item	Approval	Requirement	Government Department	Timing
		concentration of any pollution involved; <ul style="list-style-type: none"> <li>the circumstances in which the incident occurred (including the cause of the incident, if known);</li> <li>the action taken or proposed to be taken to deal with the incident and any resulting environmental harm, if known.</li> </ul>		
NT Government reportable events	Jabiru Electricity Supply Project Development Agreement	EDL must notify the NT Government of any reportable incidents, breaches of statutory requirements or the receipt of any notice, order or communication from a Public Authority for protection of the environment.	NT Government	Immediately upon becoming aware
NGERS Report	NA	Requirement to report company information about greenhouse gas emissions, energy production and energy consumption.	Clean Energy Regulator	31 <sup>st</sup> October

### 7.3 Record Keeping

The following records will be stored and maintained electronically for a minimum of five years except where stated below:

- Induction and training records;
- Inspections and calibrations and supporting certificates and reports;
- NGER and NPI reports;
- Waste disposal receipts (three years);
- Audits and inspections;
- Incident reports involving off-site environment effects or matters which affect land or groundwater;
- All other records concerning the construction of the power station as may be required from time to time; and
- Any other record that may be used to demonstrate compliance.

All records must be legible, accurate, complete and correct.

## 8. Opportunities

Potential opportunities associated with the Jabiru Power Station include:

- Opportunity to provide an essential service for a remote regional community and include local people in the project;
- Opportunity to demonstrate EDL's ability to manage a construction project in a National Park; and

- Opportunity to increase the usage of renewable energy in the Northern Territory through construction of a solar farm and battery.



## APPENDIX A: EDL Jabiru Power Station Environmental Risk Register

		CONSEQUENCES							LIKELIHOOD				
		PEOPLE INC CONTRACTORS	PROCESS SAFETY	ENVIRONMENT	BUSINESS FINANCIAL LOSS / GAIN <sup>1</sup>	LEGAL	REPUTATION	PROJECT SCHEDULE <sup>2</sup>	A	B	C	D	E
									Common or occurs frequently	It is known to occur or "it has happened"	Could occur or I've heard of it happening	Not likely to occur	Practically impossible
									Likely to occur several times per year	Has or could occur in the past 1-3 years	May have occurred in the past 3-10 years	Once every 10-100 years	Not likely to occur >100 years
<b>CATASTROPHIC</b>	<b>5</b>	Fatality/s	Catastrophic Loss of Containment/ Energy Release	Irreversible/ Severe Environmental Damage (>5 Years)	>\$25m	Fines/ Prosecution Relating to Criminal Breaches	International Issue	Delays >6 months; >10%	Very high 1	Very high 2	High 6	High 7	Medium 11
<b>SEVERE</b>	<b>4</b>	Permanent Disability	Major Loss of Containment/ Energy Release	Serious Environmental Harm (1 – 5 years)	\$5m - <\$25m	Major Litigation	National/ Severe Public Attention	Delays 2 – 6 months; 7-10%	Very high 3	High 5	High 8	Medium 12	Medium 16
<b>MAJOR</b>	<b>3</b>	Lost Time Injury or Medical Treatment Injury	Loss of Containment/ Energy Release	Material Environmental Impact (3 months – 1 Year)	\$500k - <\$5m	Breach of Regulation Resulting in Fine	State/Major Attention/ Concern	Delays 2 weeks – 2 months; 5-<7%	Very High 4	High 9	Medium 13	Medium 17	Low 20
<b>MODERATE</b>	<b>2</b>	First Aid Injury	Process Safety Exception	Minor Environmental Impact (<3 months)	\$50k - <\$500k	Breach of Regulation No Fine	Adverse Local Attention or Public Formal Complaint	Delays 2 days – 2 weeks; 2-<5%	High 10	Medium 14	Medium 18	Low 21	Low 23
<b>MINOR</b>	<b>1</b>	Report Only – No treatment	Process Safety Hazard/ Behavioural Issue	Low Impact/Spill (Non-reportable)	<\$50k	Low Level Legal Issue	Minor Impact/ Verbal Complaint	Delays <2 days; <2%	Medium 15	Low 19	Low 22	Low 24	Low 25

<sup>1</sup> One off EBITDA or Approximate NPV

<sup>2</sup> % \$ overrun after all available contingencies have been absorbed (Capex and Opex) – Projects only

## APPENDIX B: Environmental Legislation applicable to Jabiru Power Station

Legislation	Link to activity
Environmental Assessment Act 1982	Disturbance of vegetation including conservation status vegetation. Process for approvals of new or expanded activities and facilities.
Environmental Protection (National Pollutant Inventory) Objective 2004	Implementation of the National Pollutant Inventory reporting scheme in the Northern Territory.
Environmental Protection (National Pollutant Inventory) Measure 1998	Contains mandatory provisions requiring that businesses must report to the NPI program. It reiterates the requirements outlined in the national legislation – what a company has to report and when.
Waste Management and Pollution Control Act 1998	Environmental incident reporting requirements. Spills or leaks of chemicals onto land. Waste management on site.
Water Act 1992	Protection of water resources surrounding and in the ground beneath the site.
Dangerous Goods Act 1998	Management of chemicals and fuels stored and used at the site.
Bushfires Management Act 2016	Fire management risk - Burning of vegetation and surroundings caused by EDL construction works.
Weeds Management Act 2001	Management of declared pest species within the power stations
Litter Act 1972	Prohibits the depositing of litter on any land or into any waters.
Soil Conservation and Land Utilisation Act 1969	May apply to soil and land conservation of power stations surroundings including issues such as soil conservation, land degradation and land drainage.
Northern Territory Aboriginal Sacred Sites Act 1989	Possibility of finding an Aboriginal heritage item during power station construction.
National Greenhouse and Energy Reporting Act (NGERS) Act 2007	Provides a single national framework for reporting and disseminating company information about greenhouse gas emissions, energy production and energy consumption.
Australian Standards as applicable	Spills or leaks of chemicals onto land or water.

## **APPENDIX C: Soil and Water Management Plan**