KENDEL Building Co.

Servicing the Northern Territory

ENVIRONMENTAL MANAGEMENT PLAN





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INTRODUCTION AND OBJECTIVES

The primary purpose of the EMP is to describe the management systems and procedures which will be adhered to in continuously achieving environmental compliance. It outlines how Kendel Building Co proposes to manage and control environmental aspects and potential impacts during various projects and site conditions. The EMP prescribes all applicable procedures, processes, and practices to be undertaken by Kendel Building Co and their subcontractors in order to manage environmental risks, effectively minimise impacts on the surrounding environment, and ensure compliance with regulatory and other obligations throughout the works delivery.

The main objectives of the Kendel Building Co EMP is to:

- Define roles and responsibilities for staff and subcontractors;
- Outline relevant laws, legislation and other relevant documents related to the works being undertaken, and implement strategies to ensure compliance is met or exceeded;
- Outline the control measures and management practices that will be employed during works to minimise the potential for adverse environmental effects;
- Foster a positive culture towards environmental management to contribute to overall environmental performance;
- Outline processes for environmental management auditing and reporting;
- Encourage ethical practices by all employees, subcontractors and suppliers; and
- Promote and record efficient use of resources.

ENVIRONMENTAL POLICY

Policy Statement

As part of our commitment to achieving the principles of responsible environmental management, sustainability, and protection of the natural environment in our workplace, we recognise our moral and legal responsibility to ensure that our activities, products and services are designed to protect and enhance the environment in the communities in which we operate, and our obligations to ensuring that our operations do not place the natural environment or the local community at risk of harm.

Aims and Objectives

We are committed to environmental improvement and prevention of pollution. We will achieve this by working with our customers, suppliers and the community to adopt procedures that:

- Reduce waste through innovative work practices and recycling practices;
- Minimise environmental impacts by reduction of polluting substances produced by our operations, activities, products or services;
- Minimise the impact of our operations on the neighbouring community;
- Increase the use of environmentally acceptable materials, equipment, and technology in place of those which are considered harmful;
- Ensure that our suppliers follow acceptable environmental policies;
- Actively promote environmental awareness among staff, clients, customers and the general public; and
- Establish and maintain a Management System modelled on the Australian and international Standards ISO 9001:2008 Standard AS NZS 4801:2001 and ISO 14001:2004.

Responsibilities

We recognise that the overall responsibility environmental sustainability rests with Tim Delaney, who will be accountable for the implementation of this policy. These responsibilities include:

- Ensuring that all environmental policies and procedures are implemented;
- Establishing measurable objectives and targets to ensure continued improvement aimed at the elimination of waste, pollution and environmental harm;
- Encouraging consultation and co-operation between management, employees and stakeholders in matters which may affect or impact on the environment; and
- Providing adequate resources to meet these environmental commitments.

Employees also have responsibilities, which include:

- Following all environmental policies and procedures; and
- Recognising and reporting hazards which may affect the health and well-being of the environment.

Authorised By

Signed By: Tim Delaney Date: 21/01/2020

Revision A Effective: 29/9/23

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RELEVANT LAWS AND LEGISLATION

The key legislative and other requirements which are relevant to projects that Kendel Building Co conducts work on include the following:

Commonwealth Government

- Environment Protection and Biodiversity Conservation Act 1999;
- Australian Heritage Commission Act 1975-1990;
- Aboriginal and Torres Strait Islander Heritage Protection Act 1984;
- Protection of Moveable Cultural Heritage Act 1986 and Regulations 1987; and
- Native Title Act 1993.

State Government

- Environmental Assessment Act;
- Northern Territory Environment Protection Authority Act; and
- Waste Management and Pollution Control Act.

Local Laws

• The applicable local laws will depend on the location of each specific project.

Project Specific Documents

Vehicle Cleanliness inspection documentation

ENVIRONMENTAL ROLES AND RESPONSIBILITES

Environmental Management Representative

Kendel Building Co environmental representative staff has a general environmental duty under Section 319 of the EP Act, and must not carry out any activities that cause, or are likely to cause, environmental harm, unless all reasonable and practical measures are taken to prevent or minimise harm. If in the performance of their work, the representative notices that serious or material environmental harm is being caused or threatened by their actions or the actions of someone else, they should report the matter, under Section 320 of the EP Act.

In addition to the above, the following outlines the Environmental Management Representative responsibilities:

- Establishment and maintenance of the company's EMP and documentation;
- Implement all monitoring and reporting requirements including all regular site inspections to ensure all protection measures are in place and adequate;
- Provision of adequate environmental training to all staff, subcontractors and visitors to the site;
- Coordinate and gain all approvals, permits and licences for each specific project;
- Liaise with relevant Government bodies and environmental consultants as required;
- Liaise with the Principal/Client/Contractors on remedial and corrective actions in response to non-conformances as required;
- Arrange and conduct regular internal reviews of this document;
- Distribute environmental notices and alerts to employees and subcontractors;
- Monitor any legislative changes to government policies that could influence this document and thus amend this document to include the list of legislation;
- Participate in site inspections, audits, reviews, etc.; and
- Implement, or oversee the implementation of corrective actions for non-conformances resulting from audits, investigations, incidents/accidents, hazards, injuries, and near misses where nominated as the person responsible.

All Site Personnel

All site personal, including employees and subcontractors, have the following responsibilities:

- Familiarise themselves with their responsibilities within this plan and Kendel Building Co environmental management systems;
- Attend all Site Inductions and Pre-Starts;
- Participate in site inspections, audits, environmental meetings, Toolbox Talks, etc., where requested/required;
- Comply with all site environmental rules;
- Use or follow all controls established for eliminating or controlling environmental risks including those found in environmental documentation e.g. SWMS;
- Stop work if the environment is placed at risk and discuss strategies to rectify environmental concern(s) immediately with supervisor;
- Report all hazards, incidents, near misses immediately to the supervisors as soon as it is safe to do so and prior to leaving the site;
- All site personnel who sign onto a SWMS are empowered to identify, implement and advise of adjustments to the SWMS;

- Comply with all environmental responsibilities assigned in relevant legislation, approvals, permits procedures, SWMS, plans, job descriptions or any other environmental documentation;
- Raise any environmental issues or concerns immediately with the supervisor or Environmental Representative; and
- Uphold an active interest in workplace environmental compliance.

ENVIRONMENTAL REPORTING AND INCIDENTS

Any environmental incidents will be immediately reported to the Environmental Representative, who will report the incident to the Client/Contractor if required.

In the event of serious or material environmental harm, Kendel Building Co will notify the relevant regulatory authorities and, if applicable, respective property owners or occupiers within 24 hours of the incident occurring.

An incident will be reported if any of the following scenarios occur or have the potential to occur:

- Serious Environmental Harm;
- Material Environmental Harm;
- Prosecution by a Regulatory Authority;
- Environmental Approval condition breach; or
- Environmental monitoring parameter breach.

Incidents will be reported both verbally and in writing. Details of any environmental incident will be investigated and reports filed appropriately, and information will be forwarded to the Client / Contractor if required. Verbal notification will be provided immediately (no longer than two hours), and written notification will be forwarded as soon as practical and possible.

Environmental Complaints

In the event of an environmental complaint, Kendel Building Co will liaise with complainant to adjust work practices in response to the complaint, and will take all reasonable and practical measures to mitigate issues which may reduce the likelihood of further legitimate complaints.

ENVIRONMENTAL MANAGEMENT COMPLIANCE

Kendel Building Co is committed to ensuring environmental compliance and shall ensure that all work undertaken is as per the company's procedures, policies and relevant project documents. When required by a project, work procedures and methods shall be developed to ensure the Contractors/Principals objectives and targets are met.

Kendel Building Co is committed to minimising environmental impact, and their responsibility includes:

- Meeting current environmental requirements;
- Use products and provide solutions that minimise impact on the environment;
- Offer products and solutions that are safe, energy efficient and environmentally friendly; and
- Adoption of continuous improvement strategies and techniques.

Any incidents which cause, or could cause damage or contamination is to be notified immediately to the site supervisor and company Environmental representative, and an Injury, Incident and Investigation Report Form (see Appendix 1) completed and kept for records.

ENVIRONMENTAL PLAN AUDITS AND REVIEWS

Site Inspections

As a matter of course, informal audits will be undertaken daily on site. These audits should regularly include relevant employees and subcontractors, and an assessment of environmental controls and issues will be conducted. Any non-conformances that are identified should be actioned, and reported as required.

Formal site audits will be undertaken periodically by the Kendel Building Co Environmental representative. These will be conducted at a very minimum of every 12 months. The audit will be recorded on the Field Audit Checklist (Appendix 2), and be filed appropriately. Any issues or non-confirming items shall be actioned, and closed out in a sufficient time frame.

Some Clients or Contractors on specific projects may require Kendel Building Co to conduct their own site audits on a more regular basis. These will be done in accordance with the project requirements, and conforming documentation submitted as required.

Management Plan Audit

An internal review of the EMP and all associated documents will be undertaken:

- 1. At least every 12 months;
- 2. Following significant environmental incidents; and
- 3. When there is a need to improve performance in an area of environmental impact.

The Kendel Building Co Environmental Representative will be responsible for these reviews to achieve continuous improvement in environmental performance for the company.

ENVIRONMENTAL RISK IDENTIFICATION AND ASSESSMENT

The below table outlines common environmental risks associated with works that Kendel Building Co has completed in the past and expect to be ongoing in future works.

Water Quality	Erosion and sedimentation from earthworks and disturbed areas reducing the water quality in local waterways	
Hazardous Chemicals Use	Pollution of waterways or soil from spills	
Weeds and Pests	Transport of weeds to and from worksite with plant, equipment, and materials.	
Flora and Fauna	Disturbance of vegetation and fauna habitat	
Waste	Waste material generated during construction	
Cultural Heritage	Discovery of artefacts during works	
Environmental Nuisance	Generation of dust, noise, or vibration nuisance for local community during construction operations	

The environmental risks (aspects and impacts) listed above have been assessed, and Kendel Building Co have documented and implemented mitigation measures into the EMP. To determine appropriate mitigation measures, the following table was used to assist in ensuring risk reduction:

Impact Band	Environment & Heritage	Reputation
Substantial	Environment & Heritage	International negative media coverage. Loss
(1)	Permanent widespread ecological damage	of business from key sector, significant visible damage, court case, major delay
Major (2)	Heavy ecological damage, costly restoration	Sustained national or local negative media coverage. Widespread complaints, loss of long-term key client, EPA prosecution action, visible damage
Moderate (3)	Major but recoverable ecological damage	EPA statutory notice, regional/short negative media coverage. Loss of client / project, consistent complaints, limited delays and impacts
Minor (4)	Limited but medium-term damage	Brief local negative media coverage. Site or project problem, few complaints, EPA, or media not interested
Negligible (5)	Short term damage	Unlikely complaints, no pollution or harm, less than \$500 to rectify

Environmental risk assessments will be continuously monitored with an emphasis placed on any changes to construction methodologies, changes in materials used, and works within or adjacent to sensitive receiving environments. The Environmental Representative will be responsible for management of risk identification and assessment in consultation with other employees and subcontractors. Any necessary updates or changes will be implemented in accordance with this EMP.

ENVIRONMENTAL MITIGATION MEASURES

The environmental measures that Kendel Building Co has implemented are comprehensively outlined below. Many of these measures are also outlined in the SWMS. Certain projects and sites will require additional measures to the ones listed below, and some of the outlined measures may be non-applicable. The company Environmental Representative and Site Supervisor will make this assessment for each work activity, and ensure they are communicated to all involved personnel through site specific inductions, pre-start meetings and toolboxes.

Chemical Substances

Criteria

- No major accidental or uncontrolled releases to occur;
- All minor releases to be managed, remediated, and reported;
- All disposal of contaminated or regulated waste to be compliant with laws and regulations;
 and
- No complaints related to chemical, fuel or oil storage or handling from the local community or Client/Contractor.

Mitigation Measures

- Refuelling of any vehicles or plant within the worksite will be performed in a manner so as to ensure no spill will occur (use of funnel, etc.);
- Where possible, refuelling should be carried out at a service station;
- Fuel or chemical storage facilities onsite shall be bunded;
- Where possible, fuels, paints and other chemicals should not be stored onsite;
- Potentially harmful substances not to be stored or handled within 50m of existing water bodies or drainage channels;
- Major maintenance work on plant or vehicles will be undertaken in a designated area away from water bodies and drainage lines; and
- Hazardous and industrial waste will be stored and disposed of in an environmentally appropriate manner, before being transported offsite and disposed of at a licenced facility.

Erosion and Sediment Control

Criteria

- No accidental or uncontrolled release of sediment-laden water to surrounding waterways or stormwater system;
- No irreversible erosion or loss of soil from exposed surfaces, drainage channels or batter;
- Conformance with provisions of all regulatory and other requirements to be achieved throughout the works; and
- No complaints related to water quality from the community or Client/Contractor.

Mitigation Measures

- Implement controls (i.e., diversion and catch bunds, sediment fencing) before earthworks activities commence;
- Controls should be focused on prevention, rather than treatment of runoff;
- Divert clean water away from works area;

- Where possible, avoid stockpiling materials onsite;
- Seal or cover stockpiles;
- Maintain controls after rainfall and on a regular basis, such as repair bunds, clean up sediment, etc.;
- Complete earthworks to ensure the minimum amount of vegetation is removed and site exposed at any one time;
- Weather forecasts to be monitored frequently by the Environmental Representative and site foremen to ensure warning and preparedness for any rainfall event; and
- Daily Inspections will be carried out by the Environmental Representative or Supervisor.

Noise and Vibrations

Criteria

- Noise and vibration levels are to be minimised as not to cause environmental nuisance;
- Construction activities and traffic will be minimised as much as practicable near sensitive receptors; and
- No complaints related to noise or vibration from the local community or Client/Contractor.

Mitigation Measures

- Sensitive receivers located in proximity to the proposed works will be regularly consulted with and given advance warning of any out of hours or high-risk work activities;
- Allowable work hours to be strictly adhered to throughout works;
- Plant, equipment and machinery will be serviced as per manufacturer's recommendations to ensure good working order;
- Plant, equipment or machinery emitting excessive noise levels will be removed from site until repaired, or silencing / baffling device installed;
- Where possible, tools that generate excessive noise should be placed away from sensitive receptors (i.e. compressor on other side of works);
- Use of horns, bells, beepers and other audible signals will be minimised as much as practicable; and
- In response to complaints, the source of excessive noise or vibration will be immediately shut down until all interested parties have come to resolution

Waste and Recycling

Criteria

- The waste minimisation hierarchy of principles will be integrated into all construction activities:
 - 1. Avoid
 - 2. Reduce
 - 3. Reuse
 - 4. Recycle
 - 5. Dispose
- Any opportunities to reuse or recycle construction materials to be identified and implemented;
- Disposal of hazardous or contaminated wastes to be done in a compliant fashion; and

• No complaints related to waste management or disposal from the local community or Client/Contractor.

Mitigation Measures

- Materials should be ordered in quantities that allow for minimal waste generation where possible;
- Wastes that can be recycled shall be separated from general waste, and recycled appropriately;
- General waste shall be collected and stored onsite in a manner that does not allow for the waste to spread or contaminated the surrounding areas;
- General waste shall be removed from site on a regular occurrence, and disposed of properly at an approved waste disposal facility;
- Hazardous waste is to be stored in an approved manner onsite, and disposed of at a licenced facility;
- Works undertaken in or near waterways will be cleaned up on a daily basis to ensure no
 materials remain in a location where they could enter a waterway in the event of rainfall
 outside of work hours; and

Housekeeping in site work areas will be regularly undertaken to ensure no waste materials cause littering.

