



Environmental Management Plan

Northern Trade Solutions

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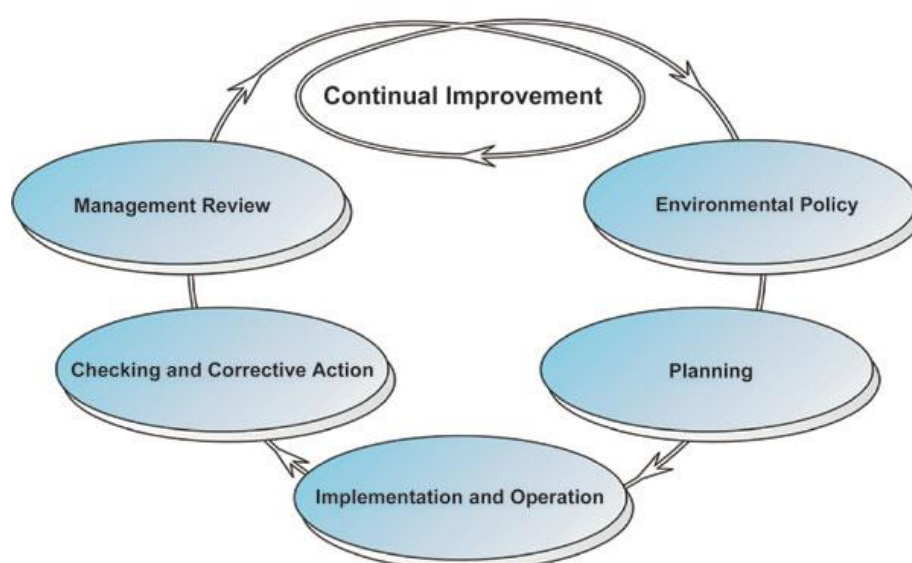
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1.0 Introduction

Many activities undertaken by Northern Trade Solutions can potentially impact on the local environment. The behavior of all Northern Trade Solutions personnel and contractors is critical to ensuring that we meet our obligations to conserve resources and reduce environmental impacts. Examples include, reducing energy and water usage, minimizing waste generated by daily work activities in all the sites that Northern Trade Solutions are active, including the Head Office, Warehouse, Workshop, Site Offices and Construction Site Environments and contributing to recycling initiatives.

The **EMP** is based on **AS/NZ ISO 14001:2004 Environmental Management System Standard**.

The Northern Trade Solutions **EMP** is aligned with the continuous improvement model illustrated below.



The structure of the EMP is:

Step 1	Overview & Responsibilities
Step 2	Planning/Scope of Work
Step 3	Legal Requirements
Step 4	Training & Communication
Step 5	Contractor & Supplier Management
Step 6	Reporting of Environmental Incidents
Step 7	Emergency Management
Step 8	Inspections
Step 9	Internal Audit

1.1 Definitions

Environment	Surroundings in which Northern Trade Solutions and Contractors operates including air, water, land, natural resources, flora, fauna, humans and their interrelation.
Environmental Aspect	Elements of Northern Trade Solutions and Contractors activities or products or services that can interact with the environment.
Environmental Impact	Any change to the environment whether adverse or beneficial, wholly or partially resulting from Northern Trade Solutions and Contractors environmental aspects.
Contractor	Any reference to contractor in this Plan means contractor, sub-contractor or suppliers.
Construction Workers	Direct employees of Northern Trade Solutions and those of contractors who perform trade and non-trade work on any project pertaining to Northern Trade Solutions.
Relevant Authority	When mentioned in this Plan, the relevant Authority refers to the: <ul style="list-style-type: none"> • Responsible State Workplace Health & Safety authority (NT Worksafe) • Responsible State Environmental Protection Authority (EPA) • Any other regulatory Authority as applicable
Interested Party	Person or a group concerned with or affected by the environmental performance of Northern Trade Solutions.
Internal Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by Northern Trade Solutions are fulfilled.
Continual Improvement	Recurring process of enhancing the environmental management system in order to achieve improvements in overall performance consistent with the Northern Trade Solutions Environmental policy.
Prevention of Pollution	Use of processes, practices, techniques, materials, services or energy to avoid, reduce or control the creation, emission or discharge of any type of pollutant waste, in order to reduce adverse environmental impacts.

1.2 Environmental Policy

ENVIRONMENTAL POLICY

Northern Trade Solutions acknowledges and accepts our obligation to preserve and protect the environment. Northern Trade Solutions, through the commitment and involvement of management, personnel and contractors, are dedicated to the provision of positive outcomes that are environmentally responsible to our clients, the workforce and the community.

Our Commitment

Our commitment and vision for the environment is to:

- Pursue continual environmental improvements and practices to meet all stakeholders expectations of Northern Trade Solutions environmental commitments; and
- Apply all reasonable practices across Northern Trade Solutions business undertakings in order to protect and enhance our environmental obligations.

Our Actions

To deliver our actions and vision for the environment, Northern Trade Solutions will:

- Apply a systematic approach to environmental management;
- Conduct all operations in accordance with relevant legislation and within industry best practice;
- Provide information and training to enable environmental impacts and opportunities to be identified, prioritized and managed effectively; and
- Communicate initiatives and achievements to our clients, the workforce and community.

This policy represents Northern Trade Solutions commitment to environmental preservation and protection. This policy will be reviewed annually in consultation with all Northern Trade Solutions personnel to ensure that this policy remains relevant and active.

Review Date _____

1.3 Objectives, Targets and Positive Performance Indicators

The following objectives and targets are designed to be measurable and practical, and include key performance indicators (KPIs) that define the variable to be monitored for each environmental impact.

The **EMPF 006 Environmental Risk Assessment Register** and associated Environmental Control Plans list the proposed actions to minimize adverse impacts, to monitor the performance of these measures, reporting requirements and corrective action requirements.

Environmental objectives and targets are designed to facilitate monitoring and reporting on Northern Trade Solutions performance over time. However, in this respect it is noted that environmental obligations, risks, objectives and targets may change between tasks and projects.

Objectives

- Reducing the likelihood of environmental incidents and associated business risks;
- Improving compliance with environmental legislation and policy; and thereby
- Improving our relationships with the local community, customers/clients and regulatory authorities through demonstration of responsible environmental practices.

Targets

- Statutory Notifiable Incidents = 0
- EPA Prohibition Notices = 0

Positive Performance Indicators

- 100% Environmental Inspections conducted against the inspection schedule.
- 100% Environmental Audits conducted against the audit schedule.
- Zero registered complaints resulting from unacceptable noise and/or dust levels
- Zero disturbance to flora and fauna outside site operational area
- Decline in volume of waste being generated
- Increase in volume of waste being recycled
- Spill incidents reported ASAP and rectified immediately = 100%
- Non compliance with Australian Standards regarding storage and handling of hazardous substances = 0
- Occurrence of fire caused by Ignition sources on site = 0

1.4 Records

Records must be kept of all project specific correspondence, inspections, tests, records and data. Data must be recorded in the **EMPF007 Environmental Incident Improvement Register**.

1.5 Monitoring and Reporting

The monitoring and reporting of the Environmental Objectives, Targets and Positive Performance indicators shall be via the Environmental monthly report submitted to Northern Trade Solutions Site Foreman, **EMPF005 Environmental Management Plan Report**

1.6 Responsibilities

Personnel at all levels are accountable legally and otherwise for environmental performance, within the scope of their defined and inferred roles and responsibilities, including supporting the Environmental Management System.

The WHSE Manager is the person nominated to be responsible for ensuring Northern Trade Solutions **EMP** meets legislative requirements, is established and maintained and performance is reported in accordance with **AS/NZS ISO 14001**.

1.6.1 Project Manager

- Defining Northern Trade Solutions Environmental aspects, significant impacts, requirements, objectives, priorities and targets;
- Defining the roles, responsibilities and authorities of personnel for environmental management;
- Allocating sufficient human, physical and financial resources for environmental management and monitoring/measuring performance;
- Approve Environmental Management Plan;
- Ensuring compliance with environmental legislation, regulations and approval/permit and licensing conditions;
- Keeping abreast of changes in legislation and regulations;
- Authorization and implementation of this Environmental Management Plan - **EMP**;
- Responsible for implementing such measures as are approved following recommendation;
- Required in association with appropriate personnel to formulate and promulgate specific environmental rules for activities conducted within areas under their control;
- Responsible for reporting and investigating incidents that occur within areas under their control; and
- Responsible for reporting any member of staff or contractor working on site who, by refusal or neglect, fails to observe requirements.

1.6.2 WHSE Manager

- Responsible for advising Site Management on the overall state of environmental issues;
- Acquiring and communicating/disseminating environmental management information;
- Planning and conducting training in environmental management, including induction for new employees and refresher training;
- Developing and implementing appropriate procedures generally;
- Assessing service providers abilities to conform with environmental management requirements;
- Ensuring conformity with environmental management requirements;
- Ensuring the use of appropriate technology and management practices;
- Responsible for conducting/coordinating regular site inspections for the purpose of discovering unsafe or unsatisfactory conditions and practices and to ensure by all practicable means the observance of environmental standards;
- Reporting any unsafe or unsatisfactory conditions or practices discovered on these inspections;
- Ensuring that any environmental incidents are investigated and records kept as required; and
- Ensuring **SDS** is available at the point of use and registers with risk analysis are prepared and available for all workers using these substances.

1.6.3 Site Foreman

- Must assist the WHSE Manager on a day to day basis to achieve the stated aims;
- Must assist the WHSE Manager with inspections and take action to rectify any non conformance identified;
- Have regard to weather conditions when programming daily work activities;
- Participate in Environmental inspections if requested; and
- Must report any unsafe or unsatisfactory conditions or practices discovered to the WHSE Manager.

1.6.4 External Environmental Management Consultants

- Develop an appropriate project specific Environmental Management Plan (**EMP**);
- Ensure that the EMP is communicated, implemented and maintained;
- Develop project specific Environmental Control Plans (**ECP's**)
- Develop project specific Environmental Risk Register
- Conduct monthly inspections and report to Site Management on the implementation and performance of Environmental Systems as detailed in **EMP**;
- Ensure environmental management practices reflect current industry best practice and comply with statutory requirements.; and
- Update project environmental risk register as required.

1.6.5 Site Workers (includes Northern Trade Solutions personnel and contractors)

- While at work, must take all the care of which they are capable for their own environmental health and that of other people who may be affected by their conduct at the workplace;
- Must not willfully or recklessly interfere with or misuse anything provided in the interests of environmental care;
- Must not remove any item provided for environmental protection without permission from the WHSE Manager;
- Report all environmental incidents and non-conformances to the WHSE Manager immediately;
- Follow instructions issued by Northern Trade Solutions Management and Supervisory Personnel; and
- Adhere to the **EMP** as it applies to their operations on the site;

1.6.6 Visitors

- All visitors shall be accompanied by a supervisor to ensure compliance to Northern Trade Solutions **EMP**; they shall be required to comply with all instructions given by authorized personnel for the protection of environmental issues.

2.0 Planning

This **EMP** has been developed to assist Northern Trade Solutions manage environmental performance and conformity with statutory requirements

2.1 Identified Environmental Factors

In identifying environmental risks, opportunities and impacts, Northern Trade Solutions shall consider whether any of the planned activities (including decisions) products and services relevant to the project will have any impact on the environment, including air, water or land, or involving waste, emissions, resource uses and physical attributes.

The relevant environmental issues for Project Name are indicated in the table below:

Ref:	Northern Trade Solutions Environmental Factors	References	Relevant
1	Hazardous Materials Management Control Plan	ECP 001	<input checked="" type="checkbox"/>
2	Waste Management – Contaminated Material Management Control Plan	ECP 002	<input checked="" type="checkbox"/>
3	Air Quality Management Control Plan	ECP 003	<input checked="" type="checkbox"/>
4	Noise Management Control Plan	ECP 004	<input checked="" type="checkbox"/>
5	Erosion & Sedimentation Management Control Plan	ECP 005	<input checked="" type="checkbox"/>
6	Vegetation Management Control Plan	ECP 006	<input checked="" type="checkbox"/>
7	Purchasing Management Control Plan	ECP 007	<input checked="" type="checkbox"/>
8	Demolition & Waste Management Control Plan	ECP 008	<input checked="" type="checkbox"/>
	Site Specific/Other	References	
7	Project Name	Site Plan	<input checked="" type="checkbox"/>

Opportunities are identified to reduce or eliminate emissions, water misuse, land degradation and waste.

The environmental risks and controls specific to Northern Trade Solutions are outlined within the **EMPF006 Environmental Risk Assessment Register**.

Northern Trade Solutions shall review the **EMP** minimum quarterly to ensure its continuing suitability. Changes to the **EMP** are communicated as appropriate.

2.2 Site Plan

The Site Plan Attachment 1 shows delivery locations and recycling/waste facilities for this project.

2.3 Scope of Work

Fabrication of all metal products – balustrades, window/door framing

Glazing

Asbestos – temporary storage for waste disposal

Storage of all construction chemicals and materials

2.4 Environmental Risk Assessment

An **EMPF006 Environmental Risk Assessment Register** has been developed to identify all aspects of Northern Trade Solutions activities that could have an environmental impact and assesses the potential risk and impact of that activity on the environment. Management controls have been devised to eliminate and/or minimize those identified impacts on the environment. Refer to 2.5 Environmental Risk Calculators.

2.5 Environmental Risk Calculator

Step 1: Determine Probability			Step 2: Determine Consequences			Step 3: Calculate the Risk (Likelihood + Consequence = Level of Risk)						
Probability Likelihood			People Consequences		Business/ Environmental Consequences	Likelihood						
							A	B	C	D	E	
A	Common or Frequent occurrence likely to reoccur	1	Fatality or permanent disability	Extreme damage extreme business interruption. Irreversible environment impact		Consequence	1	1E	3E	5E	7E	11E
B	Has happened before or a near miss has been recorded	2	Serious Injury or illness (lost time)	High-level damage, significant business interruption. Serious environmental impact			2	E2	E4	E8	S12	M16
C	Could occur or I have heard of it happening in the industry	3	Disability or short term injury (lost time)	Medium level damage, serious production disruption. Reversible environmental impact			3	E6	E9	S13	M17	M20
D	Not likely to occur within the business or industry	4	Medical treatment injury	Low level damage, slight production disruption. Minor environmental impact			4	S10	S14	M18	L21	L23
E	Practically impossible	5	First Aid or no injury	Négligeable damage, minimal production disruption. No environnemental impact			5	S15	M19	L22	L24	L25
Key:				Residual Risk Rating Action:								
1 – 9	E	Extreme Risk		Rating 1 – 9	Extreme Risk	Immediate action required – redesign/review						
10 – 15	S	Significant Risk		Rating 10 – 15	Significant Risk	Controls to reduce risk and monitoring required						
16 – 20	M	Moderate Risk		Rating 16 – 20	Moderate Risk	Controls to reduce risk and monitoring required						
21 – 25	L	Low Risk		Rating 21 – 25	Low Risk	Monitor as required						

2.6 EMPF 006 Environmental Risk Assessment Register

Environmental Risk Assessment Register										
Aspect	Potential Impact(s)	Standard Controls	Likelihood	Consequence	Risk Rating	Site Specific Controls	Likelihood	Consequence	Risk Rating	Person/s Responsible
Administration and Office Activities	Consumption of natural resources	Waste paper and cardboard to be collected for recycling	C	4	M18	Ensure recycling bins are installed in the office area	D	4	L21	PM
	Depletion of non-renewable resources	Switch all non essential power off	C	4	M18	Switch of lights and computers overnight	D	4	L21	PM
Storage of Waste generated from site	Visual pollution	Covers fitted to all waste containers	C	4	M18	Monitor daily.	D	4	L21	SF
	Storm water pollution	Water runoff to collection ponds	C	3	S13	Ensure all contaminates are banded and storm water drains are kept free from rubbish and debris	C	4	M18	SF WHSE
Hazardous Materials To prevent the release of hazardous materials to the surrounding environment	Pollution of soils and waters due to spills of paints, fuels, greases and oils or other hazardous material Asbestos	Incompatible materials to be stored in separate locations No hazardous substances or construction waste to be placed in or near any waterways All spills and leaks shall be cleaned up immediately using spill kits provided All hazardous waste Asbestos shall be wrapped in double 200um plastic in accordance with all regulatory procedures All hazardous waste shall be disposed of by licensed contractors Small volumes (,200L) of fuels, oils and other hazardous materials will be stored within secure sheds or containers banded trays will be used to contain hazardous materials where necessary All hazardous waste shall be disposed of by licensed contractors All machines will be serviced off site	C	2	E8	All hazardous materials to be approved by the WHSE Manager prior to arriving on site No refueling of plant is to occur within 100m of any watercourses SAFETY DATA SHEETS for hazardous materials shall be kept on site Monitor daily. ECP001 Hazardous Materials Management Control Plan	C	4	M18	SF WHSE NC EC ERC

Environmental Risk Assessment Register										
Aspect	Potential Impact(s)	Standard Controls	Likelihood	Consequence	Risk Rating	Site Specific Controls	Likelihood	Consequence	Risk Rating	Person/s Responsible
Waste Management To ensure waste material is disposed of appropriately, and the site is maintained in a tidy state. Reuse or recycling of materials wherever possible To ensure contaminated sites are managed correctly	Pollution of onsite and offsite environments	Purchasing of materials shall consider type and quantity of packaging to minimize waste Materials with potential for re- use or recycling (e.g. steel) shall be separated and disposed of in recycle bins provided by the contractor Waste shall be stored in appropriate, secure, confined areas All waste oils or other hazardous materials shall be collected by a licensed contractor Waste shall not be burnt or buried – all waste is to be removed from site to an appropriate waste facility Recycling facilities for office and personal waste shall be used where available.	C	4	M18	An adequate number of rubbish and industrial bins shall be retained on site Monitor as required. ECP 002 Waste Management – Contaminated Management Control Plan & ECP 008 Demolition & Waste Management Control Plan ECP 007 Purchasing Management Control Plan	C	5	L22	SF WHSE NC EC
Air Quality Management To prevent/ minimize potential impact of construction activity on air quality	Fumes that may have adverse effects external to the site	All equipment shall be efficient, operated appropriately, and maintained in good order Refueling of plant shall be by mobile tanker with appropriate safety and spill response equipment	C	4	M18	Engines shall not be left idling needlessly Monitor daily. ECP 003 Air Quality Management Control Plan	C	5	L22	SF WHSE NC
	Odors that may have adverse effects external to the site	Materials that may generate fumes shall be stored and used appropriately Refueling of vehicles and plant shall be conducted in a location that will minimize potential effects from odors on adjoining premises (minimum 100m)	C	4	M18	Accidental spills shall be cleaned up immediately Amenities to be cleaned daily Monitor daily. ECP 003 Air Quality Management Control Plan	D	4	L21	SF WHSE NC

Environmental Risk Assessment Register										
Aspect	Potential Impact(s)	Standard Controls	Likelihood	Consequence	Risk Rating	Site Specific Controls	Likelihood	Consequence	Risk Rating	Person/s Responsible
Air Quality Management continued	Dust that may have adverse effects external to the site	Additional dust suppression measures including regular watering etc Clearing and grubbing shall be undertaken in stages Rehabilitate or landscape the exposed area as soon as possible after completion Shaker grid or rock/gravel to be installed at access points where necessary	C	4	M18	Construction activities generating dust shall cease if prevention measures prove ineffective Access ways shall be maintained (watered) to ensure dust is not generated Monitor as required. ECP 003 Air Quality Management Control Plan	C	5	L22	SF WHSE NC
Environmental Noise To prevent/ minimize the impact of noise on the local community during construction activities	Nuisance noise generated by construction activities affecting the local community	Acoustic shielding shall be fitted to plant where necessary Physical noise barriers shall be installed wherever necessary (e.g. earth mounds or screens) Radio or lighting devices shall be used for control of site operation wherever possible (i.e. minimized use of sirens/whistles) Plant and equipment shall be maintained in good working order Machines that are used intermittently shall be shut down in intervening periods Surrounding community shall be considered when programming noise intensive activities	C	4	M18	Limit hours of operation 7am-6pm Monday – Saturday. No activity Sunday or public holidays. Monitor daily. ECP 004 Noise Management Control Plan	C	5	L22	SF WHSE NC EC

Environmental Risk Assessment Register										
Aspect	Potential Impact(s)	Standard Controls	Likelihood	Consequence	Risk Rating	Site Specific Controls	Likelihood	Consequence	Risk Rating	Person/s Responsible
Erosion & Sedimentation Control To prevent/ minimize the impact of construction activity on erosion or sedimentation in waterways external to the work site	Soil erosion, sediment transport and deposition, and the associated transport of contaminants to external waterways	Limit the area exposed to erosion by not clearing and grubbing the entire area at the beginning of the work – clear and grub the area required to perform current work activity before commencement Containment measures shall be installed as soon as practical following disturbance to the area Water is to be diverted around disturbed areas using stockpiled topsoil to form a catch bank Area to be rehabilitated as soon as possible on completion of work	B	2	E4	Control measures to be considered include sand bags, silt fence/socks, diversion drains, gravel and re-vegetation Monitor daily Conduct weekly environmental checks Conduct monthly environmental management inspections and report outcomes ECP 005 Erosion and Sedimentation Management Control Plan	C	3	S13	SF WHSE NC EC ERC
	Water quality	Containment controls shall be installed as soon as practical following disturbance in each area in accordance with approved construction drawings and environmental requirements	B	2	E4	Silt fencing, v-drains or rock checks to be installed down grade from pads. ECP 005 Erosion & Sedimentation Management Control Plan	C	3	S13	SF WHSE NC EC
Vegetation Management To prevent or minimize the impact of construction activities on flora and fauna	Un-necessary loss of flora and fauna habitat Physical harm to flora and fauna	The Project/Site Foreman to identify the areas to be cleared Management of cleared vegetation will be under the direction of the Site Foreman All vehicles to be weed free before entering site – inspect thoroughly prior to entering worksite Clear identification (flagging) of vegetation to be retained Installation of barriers at the drip line of retained vegetation Minimization of clearing across the site	C	4	M18	No construction activity or store of machines/materials in restricted areas and ensure that vehicles or machinery brought onto site are free of weed Inspect trenches, culverts and other work areas for fauna prior to commencing work Inspection of area before removal, separation and appropriate disposal of weed species prior to spreading any soil to clean area Monitor as required ECP 006 Vegetation Management Control Plan	D	5	L24	SF WHSE NC

3.0 Legal Requirements

3.1 Licenses and Approvals

The Project Manager will ensure at all times throughout construction works that all necessary legal, statutory and client permit approvals are obtained including those required for new or changed work methods. The Project Manager needs to ensure that all work carried out under a legal, statutory or permit approval(s) is done so within Northern Trade Solutions and the Principal Client's obligations and guidelines.

Records of all legal, statutory and principal clients permit approvals and relevant correspondence is to be maintained by Northern Trade Solutions and made available to workers on request.

3.2 Instructions for Obtaining Approvals and Licenses

STRATEGY/CONTROL MEASURE	RESPONSIBILITY	TIMING/FREQUENCY
Obtain all licenses and approvals required for the construction of works including as necessary:		
<ul style="list-style-type: none"> Environmental Authority licenses of any temporary infrastructure or facilities 	Project Manager	Before commencement of project or on site
<ul style="list-style-type: none"> Any Authorities and approvals from the relevant authority in respect to dangerous goods and hazardous materials on site. 	WHSE Manager	Before removing from site or bringing materials on site
<ul style="list-style-type: none"> Any approvals from the relevant authority in respect of traffic management and works in roads. 	Project Manager	Before commencement of these works
<ul style="list-style-type: none"> Any approvals from Northern Trade Solutions in respect to bringing equipment on site and the cleaning of equipment to ensure it is pest and weed free upon entering the site. 	Project Manager/ WHSE Manager	Before bringing each item of plant or equipment on site
<ul style="list-style-type: none"> Any authorities and approvals from the relevant authorities in respect to the transportation and disposal of site material wastes, chemicals and liquid wastes off-site. 	Project Manager/ WHSE Manager	Before transportation and disposal of the waste materials

3.3 Acts and Regulations

Relevant to project:

- NT Environment Protection Authority Act 2013
- Environmental Assessment Act 2013
- Environmental Assessment Administrative Procedures 2013
- Waste Management and Pollution Control Act 2013
- Waste Management and Pollution Control (Administration) Regulations 2013
- Australian Institute of Petroleum Code of Practice – 22 1994

- Australian Standard 1940 – The storage and handling of Flammable and Combustible Liquids 2004

4.0 Training and Communication

- The Project Manager in conjunction with the Site Foreman must ensure that relevant personnel (particularly the WHSE Manager) are trained into the requirements of this **EMP** including all associated plans and forms.
- Training and environmental awareness of all site personnel is initiated via the Northern Trade Solutions initial work commencement induction and site specific induction. A site induction program has been established. Records must be kept of all site inductions.
- Where high-risk hazards are identified, detailed training must be arranged to ensure personnel fully understand the environmental hazards and risks associated with that specific work activity. This will be carried out by training the personnel involved into the **EMPF006 Environmental Risk Assessment Register** and a record of this training must be maintained.
- **EMPF004 Environmental Inspection Reports** will monitor the effectiveness of this training.

4.1 Means of Communication

- Inductions
- Toolbox meetings
- Training sessions
- Informal events (e.g. Barbecues)
- Email
- Onsite ongoing supervised training & verbal communications

5.0 Contractor and Supplier Management

Northern Trade Solutions shall include contractors and suppliers in the **EMP** induction prior to work commencing on site. A copy of the **EMP**, **EMPF006 Environmental Risk Assessment Register** and site plan (if applicable) shall be sent out with all contracts.

5.1 Purchasing

Northern Trade Solutions shall ensure that purchased products conforms to specified requirements and where practicable, hazardous substances are to be substituted for a less hazardous product with a lower environmental impact.

6.0 Reporting of Environmental Incidents

- All incidents are to be reported to the appropriate supervisor as soon as the incident is identified **EMPF001 Environmental Incident Report & Investigation**
- All significant environmental incidents will be recorded and reported to the relevant authority by the Project Manager or WHSE Manager.
- All Incidents will be investigated to improve systems and prevent recurrences **EMPF 001 Environmental Incident Report & investigation** and **EMPF007 Environmental Incident Improvement Register**.

The Project Manager is responsible to coordinate any necessary containment and remediation measures in consultation with the WHSE Manager.

Regular checks by the Site Foreman and routine inspections by the WHSE Manager and external consultants will ensure prompt reporting and remediation of any problems.

6.1 Reporting of a 'pollution incident' to regulatory authorities

The Project Manager is responsible for reporting a pollution incident which may pose material environmental harm to the appropriate authorities.

The Environment Protection Authority is the notifiable authority.

Contact Details:

Environment Protection Authority

Street: Level 1, Arnhemica House, 16 Parap Road, Parap

Postal: GPO Box 3675, Darwin NT 0801

Email: ntepa@nt.gov.au

Phone: 08 8924 4218

7.0 Emergency Pollution Management

7.1 Initial Assessment

An initial assessment is to be made of the situation by the WHSE Manager; in particular what needs to be done to contain the spill and what resources will be required to carry out this containment.

7.2 Contacts

Contact the Project Manager and Site Foreman immediately, advise the appropriate personnel of the situation for technical advice and support.

7.3 On Site Containment

If the spill can be dealt with by on-site resources, Northern Trade Solutions designated personnel shall co-ordinate the response. If containment is regarded to be outside the capacity of the on-site resources, contact the EPA (Note: if some doubt exists, the Emergency Services should be called as a precautionary measure).

7.4 Emergency Services

If an emergency service is required to attend the scene, they will assume control of the situation. Northern Trade Solutions staff and nominated subcontractors will assist the emergency service as requested.

7.5 Access and Egress Control

Access and egress control to the area is to be established to ensure that the appropriate vehicles have effective access and congestion is minimized. Emergency services vehicles shall have 'right of way' at all times.

7.6 Log of Events/Complaints

A log of events is to be maintained for record purposes, including actions, personnel and timing. Complaints shall also be recorded and reviewed during management meetings **EMPF002 Environmental Complaint Record** and logged into **EMPF007 Environmental incident improvement Register**.

7.7 Investigation Report

A full investigation report of the event is to be completed by the WHSE Manager in conjunction with qualified external consultants as soon as practicable after the situation has been stabilized **EMPF001 Environmental Incident Report & Investigation**. Briefing of emergency teams is an important aspect in ensuring a comprehensive report is prepared.

7.8 Recommendations

Recommendations to prevent recurrence are to be acted on in accordance with the timing identified within the investigation report. Records are to be maintained **EMPF007 Environmental Incident Improvement Register**.

7.9 Discovery of Contaminated Materials/Contamination of Materials

In the event of contaminated materials being discovered on the site or contamination of materials on the site the WHSE Manager shall ensure the set action procedure (in accordance with the project environmental risk register) for the particular situation is followed. The WHSE Manager will also ensure all site supervisory personnel are familiar with this procedure, and that all steps are taken when the need arises.

7.10 Performance Monitoring and Review

Northern Trade Solutions is responsible for developing monitoring, inspection and internal audit procedures to ensure the effectiveness of the Environmental Management System. These procedures shall identify if contingency plans and remedial or corrective action plans need to be developed to prevent incidents or address issues as a result of inspections, monitoring and reviews.

Currently the primary means of identifying potential issues and hazards is via the **EMPF006 Environmental Risk Assessment Register** process which has led to the development of the Site Specific Project Risk Register and Environmental Control Plans (ECP's).

The **EMPF001 Environmental Incident Report & Investigation** procedure implemented in the operational stage will contribute to the continuous improvement process. The project **EMPF007 Incident Improvement Register** and amended on the **EMPF006 Environmental Risk Assessment Register** will be reviewed and updated regularly based on performance. Persons responsible for the various practices and procedures specified in the following tables are as follows:

Action	Day to Day Monitoring	Weekly Monitoring
EMP Issues	SF/NC/WHSE	SF/WHSE
Operations – manage	SF/NC/WHSE	SF/WHSE
Operations – implementation	SF/NC	SF/WHSE/NC
Monitor	SF/WHSE	SF/WHSE
Reporting	WHSE	WHSE to SF/PM
Audit	SF/WHSE	WHSE/EC
Instruct	SF to WHSE WHSE to NC	WHSE to NC and EC

Key Personnel Legend			
PM	Project Manager	EC	Environmental Consultant
SF	Site Foreman	NC	Nominated Contractor
WHSE	WHSE Manager	ERC	Emergency Response Coordinator

8.0 Inspections

- Formal Environmental Inspections must be conducted on a formal Monthly basis as an “Environmental Walk”. This walk will identify potential environmental risk/hazards and suggested action items **EMPF008 Environmental Checklist**
- EMPF008 Environmental checklists** will be carried out by all Northern Trade Solutions Management personnel on a regular but random basis to ensure targets are being met.
- The Project WHSE Manager and/or Forman will undertake these random inspections and recorded on the **EMPF008 Environmental Checklist** and submitted to the WHSE Officer.
- If any rectification or maintenance is required or carried out this will be documented on the **EMPF008 Environmental Inspection Checklist** and to be added to **EMPF006 Environmental Incident Improvement Register**.
- An Environmental Management Plan Report is prepared by the WHSE Officer and submitted to the Project Management for review during monthly site management meetings if required **EMPF005 Environmental Management Plan Report**

8.1 Non Conformance, Corrective & Preventative Action

The Site Foreman in consultation with the WHSE Manager is responsible to determine what actions need to be taken to address (mitigate) the problem, what changes need to be made to correct the situation (to restore to normal conditions) and what should be done to prevent the problem from recurring (to eliminate the cause).

Where non conformances are identified, the WHSE Manager or External Consultants shall raise an Environmental Improvement Notice **EMPF003 Environmental Improvement Notice** and add to **EMPF007 Incident Improvement Register**.

The timing of recommended corrective actions shall be appropriate to the nature and scale of the nonconformity and the environmental impact

The Site Foreman is responsible to ensure that corrective and preventative actions have been implemented, and that there is systematic follow up to ensure their effectiveness.

9.0 Internal Audit

Environmental Audits will be conducted every minimum quarterly to verify compliance with the **EMP**, associated forms **EMPF006 Environmental Risk Assessment Register**, **EMPF007 Incident Improvement Register**, **EMPF008 Environmental Management Plan Report** and **ECPs**.

The EMP will be regularly reviewed to maintain its suitability and effectiveness. Reviews will be undertaken as follows:

- As a minimum, quarterly, in accordance with Northern Trade Solutions Requirements;
- If required, as a corrective and/or preventative action in response to an environmental incident or the outcomes of an environmental audit;
- As requested by the WHSE Manager should he/she deem that a review is required, based on an environmental incident or other such relevant event; and
- Where requested or required by the EPA or any other statutory authority.

10.0 Attachments

- 1 Site Plan
- 2 EMP Forms
- 3 Environmental Control Plans