



Environmental Management Plan

Darwin Facility - 17 Mander Rd, Holtze, NT

Submitted By: Jackson Meyer

Date: 25/11/2025

Version Control					
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SETTING NEW STANDARDS



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1 General Information

1.1 Contact Details

Reference	NT – Environmental Management Plan		
Address	17 Mander Rd, Holtze, Northern Territory		
Contract Resources – CR Managing Director			
Contact	Michael Charles		
Telephone	(08) 6595 9000	E-Mail	Mcharles@contractresources.com
Contract Resources – NT Division Manager			
Contact	Brayden Crain		
Telephone	0421 701 727	E-Mail	bcrain@contractresources.com
Contract Resources – NT Industrial Services Coordinator			
Contact	Craig Jones		
Telephone	0498 007 249	E-Mail	cjones@contractresources.com
Contract Resources – HSE Lead			
Contact	Mark Rigoli		
Telephone	041 986 9161	E-Mail	mrigoli@contractresources.com

Scope of Work

This Environmental Management Plan applies to Contract Resources (CR) employees and subcontractors for the purpose of general operations activities at Contract Resources Darwin Yard. These shall include:

- Removing spent media from process vessels
- Transfer & decanting of controlled waste
- Cleaning exchangers
- Chemical cleaning
- High pressure water (HPW) cleaning
- Tank cleanouts
- Vessel cleanouts
- Mercury handling and decontamination
- Storage

1.2 Document Distribution

This Environmental Management Plan has been distributed to the personnel below:

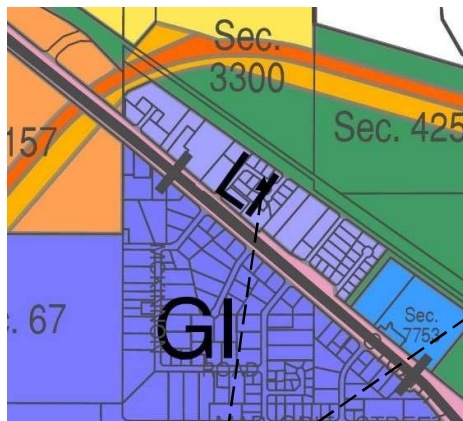
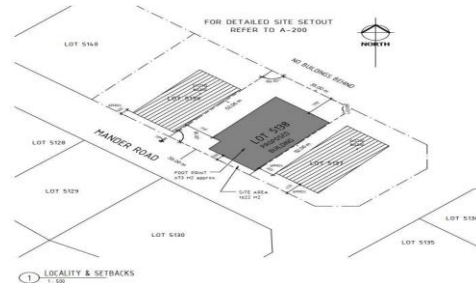
No	Issued To	Company	Date
1.	Brayden Crain	Contract Resources (NT – Division Manager)	25/11/25
2.	Craig Jones	Contract Resources (NT – Industrial Services Coordinator)	25/11/25

2 Site Locality

The site is in the Holtze light industrial estate, which is located to the north of the Stuart Highway. The site is situated approximately 4.2 kilometres to the north-west of the Palmerston Central Business District. Land uses surrounding the site include:

- to the west of the site - commercial Paint Supply operations, including storage.
- to the south of the site - commercial Fencing Supply operations, including storage.
- to the east of the site – local essential oil distillery operations, and
- to the north of the site, Crown land reserved for conservation purposes in the CN (Conservation) Zone. This land generally comprises of vegetated, vacant land.

The locality of the site is limited to the immediate light industrial land uses at Holtze, to the north of the Stuart Highway.



Site Location



Aerial photo

17 Mander Rd, Holtze, NT 0829

Figure 2.1 Site location

3 Purpose

This Environmental Management Plan gives guidelines and requirements required to protect the environment during operations at Contract Resources (CR) Darwin Yard/Facility . All Contract Resources personnel and their sub-contractors working on the CR Darwin Yard are required to abide by the details outlined in this Environmental Management Plan and all other supporting documentation related to this project.

4 Scope

Contract Resources is committed to the philosophy of achieving ‘Zero Harm’ to employees, the environment, clients, subcontractors and the wider community, by implementing and following HSE and Quality procedures. The details of how these company procedures will be specifically implemented during operations of the CR Darwin Yard/Facility are detailed within this document. Whilst reviewing this document if you require any further supporting documentation, or require further clarification please contact Craig Jones.

5 Objective

The objectives of this document are to give the operations teams for the CR Darwin Yard a detailed summary of how Contract Resources and their sub-contractors will deal with environmental risks (see **Environmental Risk Assessment in Appendix A**) whilst working at this site. The specific objectives of the document are to give details on:

- Contract Resources policies
- Contract Resources environmental goals
- Hazard identification and control using JSEAs
- Contract Resources HSE and Quality procedures
- Environmental management (including spills, handling and management of waste)
- Project incident reporting
- Project inspections and auditing
- Subcontractor management
- Training
- Responsibilities

6 Contract Resources Policies

The Environmental Policy Statement of the company is listed below:



ENVIRONMENTAL POLICY

Contract Resources is committed to protecting the environment by managing its operations in a responsible and sustainable manner.

Environmental sustainability is a priority for Contract Resources and is integral to our risk-based planning and decision-making processes. We are committed to:

- focussing on preventing environmental harm during both planning and implementation of our day-to-day operations;
- promoting sustainable principles and operational methods when working with clients and third parties;
- Actively working to prevent pollution, minimise waste and limit our carbon footprint whilst embracing energy productivity;
- Continually improving our performance through setting environmental objectives, reviewing and monitoring our performance; and seeking opportunities for improvement to our management system and processes;
- Implementing awareness and training programs to ensure that environmental roles and responsibilities are understood by all; and
- Ensuring compliance with legal and other environmental requirements in all locations where we operate.

The success of our commitment requires that every person working for or with the Company:

- Is committed to our philosophy and objectives.
- Plans their work activities with consideration to their responsibility in the proactive management of environmental conditions.
- Identifies opportunities to reduce, reuse and recycle; and
- Reviews their work environment, identifies and reports non-conformances to enable Contract Resources to proactively respond to and manage non-conforming issues.

Our Chief Executive Officer is committed to and has responsibility for the implementation of this Policy. Our CEO is supported by our senior management team who are accountable for the application of this Policy in their respective area of responsibility.

This policy is be made available to interested parties and the public, reviewed annually by senior management to ensure its continued relevance to the organisation, and reviewed two-yearly by the Board.



Michael Charles
Chief Executive Officer

POL Environmental Policy V11

Due for Management Review 15/12/2025
Due for Board Review 15/12/2026

7 HSE and Quality: Site Specific Goals

Contract Resources aim of working to achieve Zero Harm and minimal impact to the environment while operating at CR Darwin Yard will be implemented via the controls listed below:

Goal	Target
Completing Job Safety & Environmental Analysis (JSEA)	Completing and signing off JSEAs for all major tasks within the project
Conducting Take 5's	Using the Take 5 safety tool for tasks not covered by the JSEA or WMS
Eliminate unacceptable environmental risk in all tasks with assistance of BBOs	Eliminate or reduce by implementation of the hierarchy of risk controls for all unacceptable environmental risks. Document through BBOs.
Shift start meetings	Shift start meetings to be conducted with all relevant personnel at the beginning of every shift
Number of CR audits (operational) to be conducted during the project	Bi-annually during operations
Number of CR inspections to be conducted throughout the project	1x per quarter during operations
Number of toolbox meetings to be conducted throughout the project	At the commencement of each shift
Recording project incidents	All incidents which occur during the project will be recorded on CR Incident Database
Project completion certificate	All subcontractor work will require a project completion certificate to be signed off by a CR representative upon completion

8 Hazard Identification and Control

Contract Resources operates a Risk Management procedure (see **Appendix A – Environmental Risk Assessment**), which includes the implementation of the hierarchy of controls whilst planning and conducting a project. By using the hierarchy of control process the level of risk shall be reduced to as low as reasonably practicable. As part of the Risk Management process a JSEA will be conducted for each major non-routine task to be carried out at the site (Note: For all process operations the manufacturers SOI will be followed in combination with the HAZOP risk assessment). The JSEAs will be reviewed and signed off by all personnel working on the task before work commences, if the job changes whilst carrying out the task the JSEA will need to be adjusted, and all personnel will need to re-sign the updated JSEA to ensure that they understand the additional risks and subsequent control measures have been implemented.

Copies of Contract Resources Risk Management procedure and JSEA forms will be available onsite to all CR employees and subcontractors. Job Safety & Environmental Analysis accomplishes the following:

- Reveals ways in which injuries or incidents could occur; highlights awareness of these hazards and details necessary precautions to be taken prior to the commencement of work.
- Suggests methods of changing the task to eliminate or reduce those hazards to as low as reasonably practicable.
- Identifies potential discharges or impact to environment.
- Highlights awareness and details control measures to be implemented prior to the commencement of work.
- Reviews the proposed work methodology and implement control actions to minimize the risk of health, safety and environmental incidents occurring.
- Produces a better perception of the requirements of task planning, safety and environmental awareness of all personnel in the work team.
- Ensure supervisory instructions are clear and easily understood by all team members.
- Ensures the correct method of performing a task with minimal impact to the environment.
- Ensures all waste created onsite is disposed of in accordance with all WA environmental regulations

9 Contract Resources HSE and Quality Documentation

As part of Contract Resources Quality Management System, the following documents are quality controlled:

- Procedures
- Standard Operating Instructions (SOIs)
- Forms

HSE and Quality documentation is based upon the AS/NZ Standards. Contract Resources is ISO 9001 and 14001 accredited. The below documentation is stored in Contract Resources internal document repository which is available electronically to all employees with internet access. All documentation is controlled, and old versions are archived. Contract Resources will use the applicable environmental documentation listed below during operation of the CR Darwin Yard. Any adaptations required to the standard documentation to meet the specific requirements of this project will be reviewed and signed off by CR NT Area Manager.

Permission can be granted to contractors if they wish to utilise their own documentation in situations where contractor documentation is at or above the quality of CR documentation. Copies of any of the standard procedures, forms or standard operating instructions can be requested from the Contract Resources NT Area Manager.

No	Document
1	HSE.PRO.Risk Management
2	HSEQ.PRO.Incident Management
3	HSEQ.PRO.Psychosocial Risk management
4	HR.PRO.Training
5	HSEQ.PRO.Hazardous Substances and Dangerous Goods
6	HSEQ.PRO.Emergency Response
7	HSEQ.PRO.Critical Incident Response
8	HR.PRO.Code of Business Conduct
9	EIS.PRO.Waste Management
10	CR Darwin Yard – Hazardous Substances Register
11	CR Darwin Yard – Induction
12	CR Darwin Yard – Emergency Response Plan
13	CR Darwin Yard – Cyclone Management Plan

10 Codes and Standards

All equipment and activities carried out onsite by CR employees and contractors will comply with relevant State and National workplace health and safety and environmental legislation, Codes of Practice and relevant Australian Standards.

Type	Title
Act	NT Work Health and Safety (National Uniform Legislation) Act 2011
Regulation	NT Work Health and Safety (National Uniform Legislation) Regulations 2011
Act	NT Environmental Protection Authority Act 2012
Regulation	NT Waste Management and Pollution Control (Administration) Regulations 1998
Act	Transport of Dangerous Goods by Road and Rail (National Uniform Legislation) Act 2010 (NT)
Regulation	Transport of Dangerous Goods by Road and Rail (National Uniform Legislation) Regulations 2011 (NT)
Act	Dangerous Goods Safety Road and Rail (National Uniform Legislation) Act 2010
Regulation	Dangerous Goods Safety Road and Rail (National Uniform Legislation) Regulations 2010
AS 1692 (2006)	Steel tanks for flammable and combustible liquids
AS 1940 (2017)	The storage and handling of flammable and combustible liquids
AS 3833 (2007)	The storage and handling of mixed classes of dangerous goods, in packages and intermediate bulk containers
AS 4323.1:2021	Stationary Source Emissions
AS 4452:2025	The Storage and handling of toxic substances
AS 4681 (2000)	Storage and handling of Class 9 (miscellaneous) dangerous goods
AS/NZS 4745:2012	Code of practice for handling combustible dusts
AS 4681 (2000)	The Storage and handling of Class 9 (miscellaneous) dangerous goods

11 Environmental Management – Transport, Treatment, Storage & Monitoring

11.1 Site Layout, Movements & Transfers

The site is currently used for waste transport, treatment and storage as well as for vehicle and equipment maintenance and storage. Figure 11.1 indicates the site layout including the location of the decontamination wash pad, liquid storage area is within a portable bund (within internal hardstand), solid storage area (within internal hardstand) and 40ft self-bunded decontamination container (external hardstand). All movements on site will be undertaken by competent and licensed forklift operators. Prescribed / hazardous waste may be decanted or transferred from one waste receptacle to another whilst onsite. These operations are to occur in only in the liquid

storage bund or decontamination wash pad.

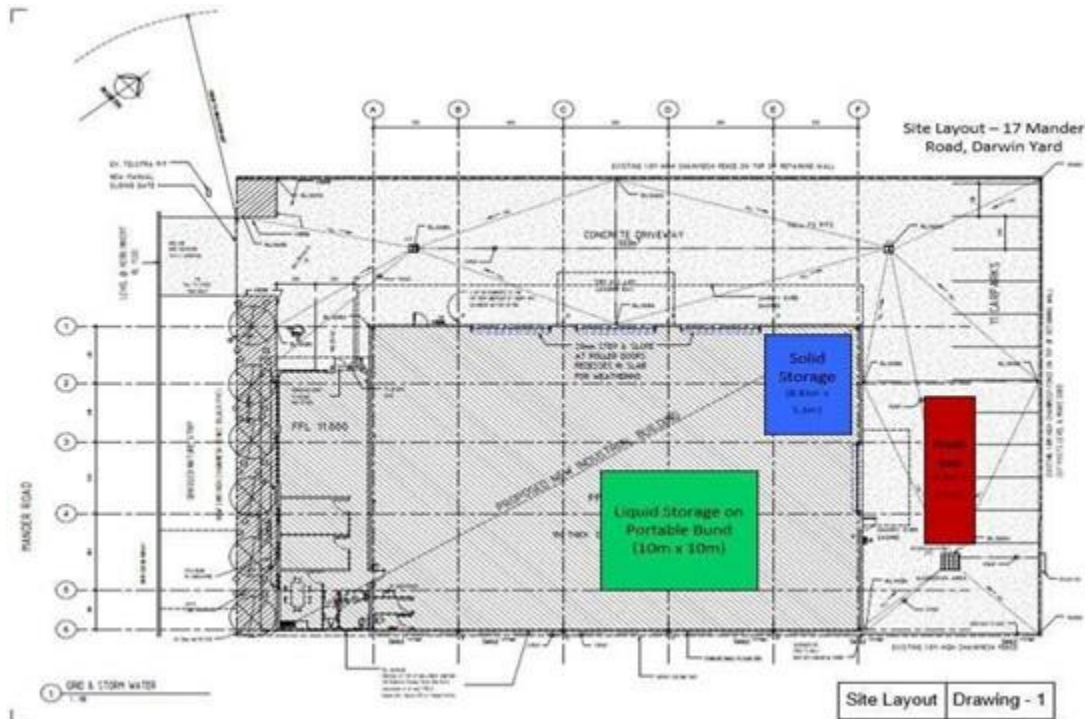


Figure 11.1 Site layout including decontamination wash pad and liquid storage bund

11.2 Conceptual Site Model

The conceptual site model is shown below:

Source	Vehicles	Solid Storage	Liquid Storage	Wash Pad
Contaminant	1.Solid Waste	1.Solid waste	1.Liquid waste	1.Liquid Waste
	2.Liquid waste	2.Odour	2.Odour	2.Odour
Pathway	1.Truck → ground → offsite (wind, rain)	1.Storage area → grade → offsite (wind, rain)	1.Containers → grade → drains	1.Wash area → grade → drains
	2.Truck → grade → drains	2.Storage area → atmosphere → offsite (wind)	2.Containers → atmosphere → offsite (wind)	2.Wash area → atmosphere → offsite (wind)
Exposure route	1.Waste dust through inhalation or skin exposure or deposition	1.Waste dust through inhalation or skin exposure or deposition	1.Skin exposure to storm waters	1.Skin exposure to storm waters
	2.Exposure to storm waters	2.Inhalation	2.Inhalation	2.Inhalation
Receptor	1.Adjacent business and community	1.Adjacent business and community	1.Adjacent business and community	1.Adjacent business and community
	2.Adjacent business and community	2.Adjacent business and community	2.Adjacent business and community	2.Adjacent business and community

11.3 Environmental Monitoring Plan

The Environment Protection Licence (EPL175-03) for the Holze facility does not specify any sampling or emissions monitoring requirements. The following monitoring is undertaken to ensure the facility complies with licence conditions and minimises environmental impact. The facility lead shall undertake regular walks around the facility and:

- Ensure all waste is adequately covered and stored to prevent spills
- Ensure all equipment is adequately maintained
- Ensure all leaks are identified quickly, cleaned up and appropriate corrective action taken
- Ensure any odours identified are traced and corrected prior to impacting neighbours
- Ensure that all waste transported is adequately contained to prevent escape and spillage
- Ensure wastewater is properly handled and pits emptied prior to overflow
- Ensure all materials are stored in the correct storage areas in the correct containers
- Ensure any noise generated is minimised and does not impact neighbours
- Ensure all complaints are recorded and addressed properly with feedback to the complainant

11.4 Transport of Waste

All waste brought onto site shall be accompanied by an SDS, which shall list the physical properties and hazards of the prescribed / hazardous waste material. Transport of listed waste to and from the site shall be completed by a licensed contractor in accordance with the following legislation:

- NT Waste Management and Pollution Control (Administration) Regulations 1998
- The Australian Code for the Transport of Dangerous Goods by Rail & Road (Edn 7.9)
- International Maritime Dangerous Goods Code 2020 Edn

11.5 Waste Types Stored Onsite

Refer to EPL license for facility.

11.6 Waste Treatment, Decontamination & Wash Pad Management

The wash pad will be utilised for 7 main activities:

- Decanting and transfer of hazardous / listed wastes from one waste receptacle to another.
- Decontamination of equipment in preparation for re-use at client facilities.
- Cleaning of sludge bin internals.
- High Pressure Water cleaning activities of contaminated plant and equipment.
- Chemical decontamination of plant and equipment contaminated with mercury &/or hydrocarbons.
- Chemical neutralization.
- Cleaning of other various components.

Treatment and de-contamination of contaminated plant and equipment is anticipated to be at its peak directly after major maintenance operations on our clients' oil and gas installations. Due to the significant amount of contaminated plant and equipment that will be produced in a short period of time and the restricted space on our client sites, it is anticipated that Contract Resources will need to store this contaminated plant and equipment at 17 Mander Rd prior to treatment. This storage shall occur within the nominated solid storage area. The liquid storage bund shall be approximately 10m wide by 10m long and shall have a height of 300mm. Total storage capacity of the bund shall not exceed 110% of the largest waste receptacle stored within the bund. All decontamination activities (Figures 11.4.1-2) will take place within the sealed wash pad 40ft container. As the sealed wash pad is constructed with ~2.6m high walls, no environmental discharge is anticipated. There shall be no pollutants released to water or land during these treatment operations.



Figure 11.4.1 Self-bunded decontamination container

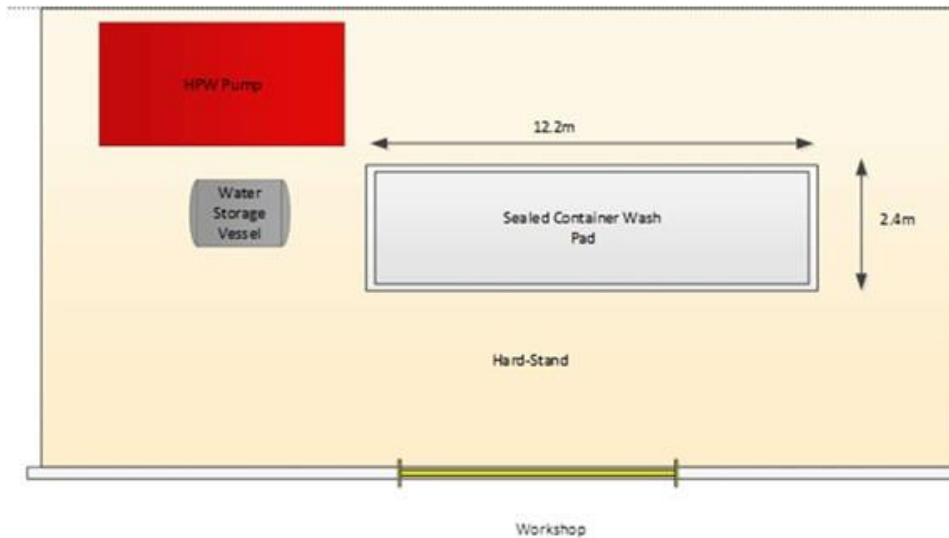


Figure 11.4.2 Decontamination area/setup

11.7 Storage Bund

If there has been a spill within the Liquid Waste Storage Bund, the CR NT Area Manager should implement the following procedure;

- Alert emergency fire services if a fire exists.
- Advise HSE advisor & Australia General Manager in Perth.
- Don PPE from office (full face RPE – ABEK1HG cartridges, rubber gloves, Tyvek F)
- Pump the product into CR sludge bins and take a sample.
- Remove the damaged storage vessel and mark out of service.
- Send a sample of the IBC content to Analytical Reference Laboratories or equivalent NATA certified laboratory for analysis to determine disposal method.
- Dispose of waste to a licensed facility.

11.8 Un-Bunded Area

- Alert emergency fire services if a fire exists.
- Advise HSE advisor & Australia General Manager in Perth.
- Don PPE from office (full face RPE – ABEK1HG cartridges, rubber gloves, Tyvek F).
- Block stormwater drains.
- Utilize a CR vacuum truck or diaphragm pump to remove liquids and contaminated soil

- Sample to be taken and sent through to Analytical Reference Laboratories or equivalent NATA certified laboratory for analysis to determine contamination level.
- Send a sample of the IBC content to Analytical Reference Laboratories or equivalent NATA certified laboratory for analysis to determine disposal method.
- Dispose of waste to a licensed facility.

11.9 Environmental Spills

During operations the team shall assess the risk of spills as part of the JSEA. All waste decanting & transfer operations shall be completed in bunded locations. If a spill does occur the Contract Resources NT Area Manager shall be notified immediately. Contract Resources spill response procedure shall be implemented immediately. In the unlikely event of product spillage, Contract Resources will investigate the incident following procedures thoroughly and make the appropriate reports and recommendations. Records of any incident involving spills shall be recorded on the Contract Resources Incident Database. Spill kits are to be located around the site.

11.10 Disposal of Waste

During operations at the CR Darwin Yard, the creation of waste shall be prevented or minimized. In circumstances where this is not possible the NT Area Manager will consult the hierarchy of disposal via the waste management pyramid (Figure 11.10.1) and determine a suitable disposal option. Initial preference for disposal shall be reuse and recycling. In situations where these disposal routes are not available or viable the waste will be treated and disposed of in accordance with applicable NT legislation. Hazardous and listed waste shall be collected and transported by a licensed contractor and disposed of at a suitably licensed facility. All waste produced during operations at the facility shall be removed and appropriately disposed of at a licensed facility.

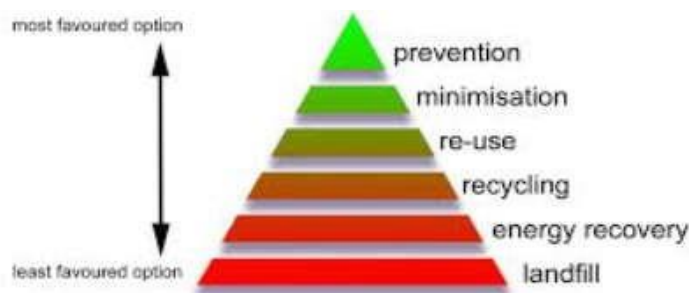


Figure 11.10.1 Waste management pyramid

To ensure waste optimization the following process shall be implemented;

- Segregation of putrescible waste
- Segregation of materials suitable for recycling; aluminium cans, scrap steel, paper, cardboard, glass
- Segregation of listed wastes

11.11 Storage of Dangerous Goods and Hazardous Substances

In combination with applicable legislation Contract Resources hazardous substance procedure (HSEQ.PRO.Hazardous Substances and Dangerous Goods) shall be always adhered to by both CR employees and contractors.

Contract Resources shall:

- Ensure all products are appropriately labelled and packaged.
- Ensure a SDS sheet is supplied and carried with all dangerous goods.
- Ensure people who handle the product are suitably trained.
- Ensure appropriate placards and signage are visible.
- Ensure appropriate barricades and suitable bunds are used.

Contractors are to advise Contract Resources of any dangerous goods to be brought onto site and the potential risk that material may pose to the environment. Contractors are to maintain a site hazardous substance register containing all SDSs of any hazardous materials they bring onto site. A copy of the SDS must also be supplied to the Contract Resources site contact.

11.12 Refuelling of Plant & Equipment

Refuelling of plant, equipment and vehicles will only occur in designated areas and will be in accordance with the equipment manufacturer's safe operating instructions (SOIs). In circumstances where drip trays are required, to minimize the potential risk of discharge to the environment, the head contractor shall make these available to staff prior to refuelling activities. All hoses and equipment involved in refuelling shall be inspected prior to use.

11.13 Emissions – Mobile Plant

All emissions into air and dust generation must be minimized. The following control measures will be implemented to minimise air emissions during operations;

- Plant and equipment need to be regularly serviced and maintained to reduce emissions.
- Site speed limit is restricted to <10km/hr.

Odour is not considered to be a risk. If an odour develops due to activities carried out onsite by either CR employees or contractors the relevant supervisor should stop the job, investigate the source of the odour, update the JSEA and implement relevant control measures.

11.14 Local Wildlife

The site is located within an industrial estate. Impact on local wildlife is therefore considered minimal. If local wildlife is encountered onsite, operations within that area shall be minimized up until a point in time that the wildlife moves on. If injured wildlife is located onsite then the contractor supervisor should contact the appropriate NT organization.

11.15 Cyclone Management

Refer to *CR NT Darwin Yard Cyclone Management Plan* for guidance (see Appendix B)

11.16 Noise

Operations may take place 24hours a day and may result in increased noise levels at surrounding environmental receivers. To minimise the impact of noise Contract Resources will;

- Ensure all ancillary equipment is properly maintained in accordance with the manufacturer's directions. Equipment found to be causing excessive noise should be removed offsite.
- Ensure that all equipment not in use is switched off.

12 Project Incident Reporting

According to Contract Resources' definitions, an incident is either: near miss, work injury, fatality, environmental spill, property damage or/and procedural non-compliance.

Any incident which may occur during operations of the CR Darwin Yard will be:

- Recorded by the Contract Resources Project Supervisor, in the Contract Resources Incident Database (Cyber Office).
- Be reported immediately to the NT Area Manager.
- Be reviewed weekly as part of the weekly management review process

Corrective actions because of the incident will remain open in the Contract Resources database until the action has been completed and approved by Contract Resources management. All investigations will commence within 24 hours of the incident occurring. All incidents will be investigated using Contract Resources incident investigation procedure. All completed incident investigations will be forwarded to the Contract Resources Australian General Manager for assessment and action where required.

13 Training

All Contract Resources personnel are to complete Contract Resources standard induction program prior to commencement of work. Any personnel and contractors engaged to work at the NT Darwin Yard will also undergo a site-specific induction. Contractors engaged to assist with operational activities shall provide evidence to the NT Area Manager or his delegate as to the suitability and status of qualifications prior to commencing any work.

14 Responsibilities

14.1 Australia General Manager

- Provide leadership and guidance to staff engaged to work at the NT Darwin Yard.

14.2 NT Area Manager

- Ensure conditions of licenses are met and that all facility licensing is certified and in date.
- Coordinate operations.

14.3 HSE Advisor

- Provide guidance on HSE issues associated with operations of the NT Darwin Yard.
- Investigate all incidents in accordance with Contract Resources procedures.

- Ensure all licensing requirements are met, and conditions are adhered to.

14.4 NT Industrial Services Coordinator

- Ensure adequate training and competency of staff onsite.
- Ensure operations of the facility are in accordance with conditions set out by NTEPA EPL.
- Act in accordance with this procedure.
- Provide technical advice.
- Develop, maintain and ensure adherence to maintenance schedule as required.
- Ensure NATA testing is carried out on all waste materials prior to disposal.
- Ensure that treated materials are disposed of accordance with applicable legislation.

14.5 Industrial Services Technician

- Perform work duties in accordance with this environmental management plan and all Contract Resources procedures.
- Operate all plant and equipment in line with manufacturers operating instructions.
- Only perform duties for which they are trained and deemed competent to do so.
- Report all hazards and incidents.

15 Environmental Management Plan Sign Off

This Environmental Management Plan has been completed for the CR Darwin Yard operations will be followed by all Contract Resources personnel and contractors working on this project. This plan has been compiled with the assistance and consultation of the persons listed below:

Name	Job Title	Signature	Date
Brayden Crain	NT Division Manager		
Craig Jones	NT Industrial Services Coordinator		
Mark Rigoli	HSE Lead		

16 Appendix A – Environmental Risk Assessment

Refer to the CR Darwin Environmental Risk Assessment

17 Appendix B – Cyclone Management Plan

Refer to the CR Darwin Cyclone Management Pan