# Environmental Management Plan

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## 1. BACKGROUND

This Environmental Management Plan has been prepared by Exact Contracting Pty Ltd (Exact Contracting) to document the environmental controls implemented throughout all of the company operations.

Exact Contracting was established in Alice Springs in 1992 as Rhodes Contracting Pty Ltd, a civil contracting business, specialising in remote area infrastructure construction. By 1997, the Company had grown and diversified to supply premixed concrete, and Exactmix Pty Ltd was established alongside the existing operations. In 2002, Exactmix Pty Ltd established its support services office in Adelaide. The name 'Exact Mining Services' was adopted in 2006 and, after further diversification in 2017, the name 'Exact Contracting' was taken on to represent the full range of mining, civil and agricultural services offered.

Exact Contracting is committed to integrating client Environmental Management Plans, procedures, and policies into each area as an essential element of management in all functions, as well as adhering to all legal and regulatory requirements.

## 2. LOCATION

Exact Contracting operates at civil, mine and agricultural sites throughout Australia with its Support Services office located in Adelaide, the stores, plant maintenance and transport depot located in Burton South Australia. Exact Contracting also operates small-scale maintenance and office operations in Alice Springs and Darwin in the Northern Territory. Contract operations occur at various short and longer-term projects throughout Australia.

## 3. INTRODUCTION

Exact Contracting recognises environmental management as among its highest priorities and as a key determinant to sustainable development. Exact Contracting is committed to undertaking and completing projects using every practical effort available to minimise adverse environmental impacts, whilst maintaining a high standard of quality.

It is Exact Contracting's objective to establish, maintain and continue to improve policies, programs and environmental performance, taking into account technical developments, scientific understanding, consumer needs, community expectations, codes of practices, state and federal regulations as a starting point.

An essential aspect of this environmental management system is to educate, train and motivate employees to conduct their activities in an environmentally responsible manner. Exact Contracting encourages openness and discussion with employees and the public, anticipating and responding to their concerns about potential hazards and impacts of operations, products, waste management or services.

Exact Contracting is accredited against ISO 14001:2015 – Environmental Management Systems where our environmental performance is continually reviewed and audited against requirements within this and other relevant documentation. Results of these audits shall be used to assess environmental performance/compliance throughout the company as part of our adaptive management strategy.

This Environmental Management Plan has been developed to align with the Exact Contracting Corporate Health and Safety Management Plan (WHSPLN-002) which has a clearly defined ongoing responsibility and commitment to work health and safety. The Corporate Health and Safety Management Plan lists the minimum requirements to comply with health, safety, environmental and community objectives of the projects undertaken so that all stakeholders may achieve a workplace that is injury-, illness-, and incident-free.

This Environmental Management Plan has been developed to overarch the Exact Contracting site-specific environmental management plans which have a clearly defined scope to the site-specific contract works and align with the associated site-specific environmental risk assessment.

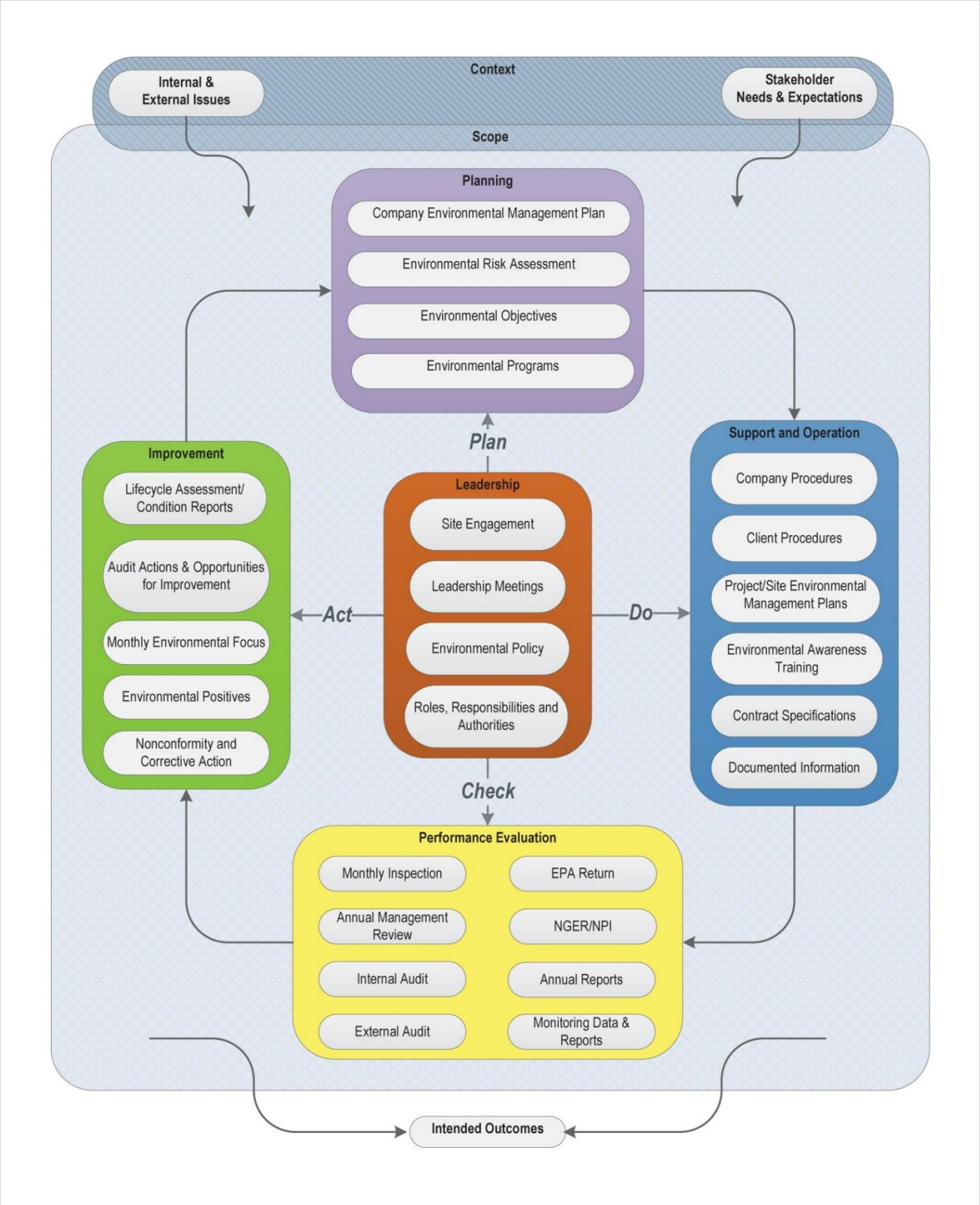


***Figure 1**: Environmental Management System Structure*

## 4. DISTRIBUTION LISTS

| Distribution List | |
|---|---|
| General Manager Operations | General Council |
| National Safety, Training and Quality Manager | Area Managers |
| General Manager Corporate and Business | Project Managers |
| Environmental Manager | Clients |
| Environmental Coordinator | Commercial Manager |

## 5. GLOSSARY OF TERMS

| Term | Definition |
|---|---|
| **Auditor** | Person with the competence to conduct an audit. |
| **Biodiversity** | Variability among living organisms from all sources (including terrestrial, marine and other ecosystems and ecological complexes of which they are part), which includes diversity within species and between species and diversity of ecosystems. |
| **Bund** | An embankment or wall of impervious material, which forms the perimeter and floor of a compound and provides a barrier to retain liquid, used for pollution prevention, fire protection, product recovery and process isolation. |
| **Client** | The party to which Exact Contracting contracts its services. |
| **Conservation** | In relation to biodiversity: the protection, maintenance, management, sustainable use, restoration and enhancement of the natural environment. In relation to natural and cultural heritage: generally, keeping in safety or preserving the existing state of a heritage resource from destruction or change. |
| **Continual improvement** | Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance, consistent with the environmental policy and objectives. |
| **Declared plants/animals** | A class of pest animals or plants declared under relevant legislation for control purposes. |
| **Ecosystem** | A dynamic complex of plant, animal and micro-organism communities and their nonliving environment interacting as a functional unit. |
| **Environment** | Surroundings in which an Exact Contracting operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation. |
| **Environmental aspect** | Element of an Exact Contracting 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 an Exact Contracting environmental aspect. |
| **Environmental management system** | Part of Exact Contracting Quality Health Safety and Environment System (Lucidity) used to develop and implement its environmental policy and manage its environmental aspects. |

| Term | Definition |
|---|---|
| **Environmental Management Plan** | A documented framework to establish, implement, review and continually improve the environmental management system. |
| **Environmental objective** | Overall environmental goal, consistent with the environmental policy that is set by Exact Contracting including a detailed performance requirement, that needs to be set and met in order to achieve said objectives. |
| **Environmental performance** | Measurable results of Exact Contracting management of environmental aspects, measured against the environmental policy, environmental objectives and other environmental performance requirements. |
| **Environmental policy** | Overall intentions and direction of Exact Contracting related to environmental performance as authorised by senior management. |
| **Erosion** | The breakdown and movement of soil and rock by water, wind, or ice. Natural erosion processes may be accelerated by human activities. |
| **Geological features** | Includes geological monuments, landscape, topography and amenity and the substrate of land systems and ecosystems. |
| **Greenhouse gas emissions** | Releases of gases (carbon dioxide and carbon dioxide equivalents) that, by affecting the radiation transfer through the atmosphere, contributing to global warming. |
| **Habitat** | The natural place or type of site in which an animal or plant, or communities of plants and animals live. |
| **Heritage** | Heritage includes places, values, traditions, events and experiences that define Australia's identity. |
| **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 are fulfilled. |
| **Native animal** | A protected animal (fauna) within the meaning of relevant state wildlife conservation legislation. |
| **Native vegetation** | A plant or plants of a species (flora) indigenous to that State or Territory. |
| **Native vegetation clearance** | Native vegetation is cleared (or would be cleared) if the relevant activity constitutes (or would constitute) clearance of the native vegetation under the relevant legislation. |
| **Natural resources** | Includes soil, water resources, geological features and landscapes, native vegetation, native animals and other native organisms and ecosystems. |
| **Pest species** | An animal, plant or pathogen that is a risk to indigenous species, ecosystems and/or agricultural ecosystems and/or human health and safety. |
| **Plant** | Vegetation of any species and includes the seeds and any part of any such vegetation, or any other form of plant material, but does not include any vegetation or material excluded from the ambit of definition by the relevant legislation. |
| **Prevention of pollution** | Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission, or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts. |

| Term | Definition |
|---|---|
| **Principal** | The party which has operational control of the site. |
| **Rehabilitation** | Actions that improve the ecological health of a natural asset by reinstating important elements of the environment. |
| **Stormwater** | Run off from an urban area. |
| **Surface water** | Water flowing over land (except in a watercourse) after having fallen as rain, hail, or having precipitated in any other manner, or after rising to the surface naturally from underground. Water of the kind that has been collected in a dam or reservoir. |
| **Sustainable or sustainability** | Comprises the use, conservation, development and enhancement of natural resources in a way, and at a rate, that will enable people and communities to provide for their economic, social and physical well-being while sustaining the potential of natural resources to meet the reasonably foreseeable needs of future generations; safeguarding the life-supporting capacities of natural resources; and avoiding, remedying or mitigating any adverse effects of activities on natural resources. |
| **Threatened species** | Species or ecological community classified as being threatened by extinction and listed as vulnerable, endangered, critically endangered or presumed extinct under relevant Commonwealth and State Legislation. |
| **Underground water or groundwater** | Water occurring naturally below ground level or water pumped, diverted or released into a well for storage underground. |
| **Wastewater** | Water that has been used or extracted for domestic or industrial purposes and is then discharged as waste. |
| **Watercourse** | A river, creek or other natural watercourse (whether modified or not) in which water is contained or flows whether permanently or from time to time and includes a dam or reservoir that collects water flowing in a watercourse or lake through which water flows. |

## 6. AIM

The aim of this Environmental Management Plan is to assess environmental risks and opportunities that may be associated with the civil, agricultural and mining service works. Part of this aim is to establish and maintain control measures to minimise impacts to the relevant environmental aspects of operations.

## 7. ENVIRONMENTAL POLICY

**7.1.** Exact Contracting is committed to:

7.1.1. Protecting the environment through the efficient management of resources, prevention of pollution and proper management of waste, biodiversity, ecosystems and heritage.

7.1.2. Analysing climate change impacts and developing strategies for mitigation and adaptation.

7.1.3. Life-cycle assessment of our operations using risk-based approaches to anticipating and mitigating environmental impacts.

7.1.4. Engaging with interested parties before starting a project and advising of environmental risks and opportunities to improve design, measures for reducing inefficiencies and public nuisance.

7.1.5. Conserving energy by improving energy efficiency and giving preference to renewable over non-renewable energy sources where feasible.

7.1.6. Utilising the businesses expertise and experience to contribute to environmentally sustainable techniques, technology, and construction methods.

7.1.7. Promoting the adoption of Exact Contracting's principles with our subcontractors and assisting them with the necessary improvements in their environmental practices where required.

7.1.8. Developing and maintaining prevention and response plans in conjunction with emergency services and interested parties.

7.1.9. Reviewing and analysing our compliance obligations at a national, state, local and contract level that relate to Exact Contracting's Environmental Management System.

7.1.10. Evaluating environmental performance and conducting regular audits and assessments of the Environmental Management System to ensure consistency with company policies, procedures, compliance obligations and Exact Contracting's principles.

7.1.11. Continuously improving the Environmental Management System through objective assessment, inspection, auditing, review and implementation of corrective actions.

## 8. CLIMATE CHANGE MITIGATION AND ADAPTATION STATEMENT

**8.1.** Exact Contracting recognises the requirement to reduce global greenhouse gas (GHG) emissions and is committed to achieving reductions in greenhouse gas emissions arising from our day-to-day operations. It is Exact Contracting's goal to ensure that all operations comply with industry efforts to meet the state, national and international targets.

**8.2.** Exact Contracting is committed to mitigation efforts and will achieve compliance with industry standards and goals by:

8.2.1. Ensuring Exact Contracting complies with all relevant legislation, regulation standards and codes of practice applicable to our operations;

8.2.2. Incorporating energy efficiency, waste minimisation and greenhouse gas reduction strategies throughout all operational strategies from conceptualisation to implementation;

8.2.3. Developing and fostering greenhouse gas and energy conservation awareness through effective communication and consultation with all employees, subcontractors, suppliers and clients;

8.2.4. Providing a commitment to training its employees in ways of reducing GHG emissions;

8.2.5. Monitoring technological developments in greenhouse gas abatement relevant to our operations; and

8.2.6. Encouraging management and staff to conduct operations in compliance with this policy while developing a culture that continually identifies opportunities for improvement in the reduction of greenhouse gas emissions.

**8.3.** It is acknowledged that the type and scale of some climate change impacts will be unavoidable, requiring the company to implement adaptation strategies to manage the consequences. The Exact Contracting Group is committed to climate change adaptation through:

8.3.1. Understanding the short and long-term scenarios for extreme temperature and rainfall in the areas of operation;

8.3.2. Risk-based approaches to quantify the impacts of climate change on business operations; and

8.3.3. Assessing our options and implementing responses to risks from climate variability and climate change.

**8.4.** A comprehensive corporate climate risk assessment has been conducted in accordance with ISO Standard requirements. This assessment evaluated the potential impacts of climate change on our operations and project sites. Due to the extreme weather conditions currently experienced across the majority of our locations, the assessment determined that the overall significance and impact of climate change on our Environmental management systems is relatively low. This corporate climate risk assessment will be reviewed annually to ensure its continued relevance and accuracy in addressing potential climate-related risks.

## 9. SUSTAINABLE DESIGN STATEMENT

**9.1.** Exact Contracting recognises the need to consider the long-term environmental, social and commercial impacts of project operations and integrate sustainability into the design and planning process. We are committed to undertaking and completing projects using every practical effort available to minimise adverse environmental impacts, whilst maintaining a high standard of quality and a low cost solution for our clients.

**9.2.** Practical advice is regularly provided to our clients in the structuring, implementation and layout of site infrastructure. Sustainable engineering processes are incorporated into Exact Contracting operations to reduce the impacts on natural resources by selecting materials, machinery, equipment, appliances, methods and designs that are energy and water efficient, prevent pollution as well as incorporating the principles of sustainable management practices wherever possible.

**9.3.** Our civil and mining engineers have the capability to design and execute services that reduce the amount of impact to the environment and local community whilst also supplying the lowest practical costs to the client and maximise efficiency throughout our mining, civil and transport services.

**9.4.** Examples of value added to our client's projects resulting in both economic and environmental benefits include:

9.4.1. The redesigning of haul roads, bridge footing piling and drainage systems to minimise the land disturbed footprint and lower the impact on waterways;

9.4.2. The redesigning of drill and blast patterns to accomplish both greater productions, whilst reducing the noise, dust and vibration levels;

9.4.3. The redesign or selection of plant and machinery to achieve lower fuel burn per bulk cubic meter of production; and

9.4.4. The provision of management strategies at the production line level to maximise time and resources being used efficiently, whilst also reducing energy consumption and greenhouse gas emissions.

**9.5.** Optimal solutions are integrated throughout the complete lifecycle of our project operations from utilizing sustainable civil engineering designs, selecting the most efficient mobilization strategy, to management methods of operations and the demobilization of a project. Throughout the duration of the project, Exact

Contracting's environmental, compliance and quality team are continuously reviewing our projects operations to ensure continual improvement, consequently achieving sustainable development.

## 10. COMPANY ENVIRONMENTAL OBJECTIVES

### 10.1. OBJECTIVE 1 – ENVIRONMENTAL COMPLIANCE

10.1.1. Maintain and improve environmental compliance to enable the company to continually meet ISO 14001 environmental management systems certification requirements and Environmental Protection Authority Licence conditions.

### 10.2. OBJECTIVE 2 – ENVIRONMENTAL RISK AND OPPORTUNITY MANAGEMENT

10.2.1. To ensure environmental risks are identified, assessed, controlled, and documented to reduce the potential of environmental impacts of company and project site activities.

### 10.3. OBJECTIVE 3 – WASTE MANAGEMENT

**10.4.** To reduce disposal to landfill through segregating waste materials so that it can be reused or recycled.

### 10.5. OBJECTIVE 4 – ENVIRONMENTAL INCIDENT PREVENTION

10.5.1. To reduce environmental incidents through continually reviewing appropriate systems of work and operational controls. Including the prevention of hydrocarbon spillage by storing hydrocarbons as per regulatory and site requirements, identifying and controlling hazards, maintaining plant and machinery in a safe condition.

### 10.6. OBJECTIVE 5 – SUSTAINABLE RESOURCE MANAGEMENT

10.6.1. To reduce the impact on natural resources by selecting suppliers, contractors, machinery, equipment, and appliances that are energy and water efficient, prevent pollution, prevent acceleration of climate change and integrate the principles of sustainable management where possible.

### 10.7. OBJECTIVE 6 – BIODIVERSITY, ECOSYSTEM AND CULTURAL HERITAGE MANAGEMENT

10.7.1. To conserve and improve the quality of fauna, flora and ecosystems, and indigenous and cultural heritage by understanding permit conditions and site attributes.

### 10.8. OBJECTIVE 7 – COMMUNITY AND STAKEHOLDER RELATIONS

10.8.1. To minimise community impact, limit disturbance to surrounding neighbours and communities at remote and metropolitan sites through adequate control of works.

## 11. SCOPE

### 11.1. CONTEXT OF THE ORGANISATION

11.1.1. The Exact Contracting Group provides mining, agricultural and civil engineering services for a variety of projects across Australia and generally provides activities and services for elements of a larger supply chain. Every project is unique having different environmental risks and compliance obligations

mandated by the State/Territory of operation, contract specifications and any associated licence and permit conditions. Consequently, the extent of the environmental management system is limited to the elements of the supply chain that Exact Contracting has the ability to control and influence. The following services have the potential to cause environmental impacts and have been used as the basis for environmental planning:

| Quarry management and mining services | Civil engineering contracting e.g. road, bridge, dam and pipe infrastructure construction (including agriculture) | Concrete batching and supply | Burton Transport, Maintenance and Purchasing Depot, and Support Services |
|---|---|---|---|
| ▪ Survey and clear.<br>▪ Drill and blast.<br>▪ Excavate open pit.<br>▪ Classify waste rock (PAF/NAF).<br>▪ Load and haul waste rock.<br>▪ Load and haul ore.<br>▪ Crush, screen and separate.<br>▪ Maintain production machinery, equipment and infrastructure. | ▪ Survey and clear.<br>▪ Excavate footprint and sand/clay/gravel borrow pits.<br>▪ Crush and screen gravel.<br>▪ Precondition materials.<br>▪ Load and haul materials.<br>▪ Excavate trenches (pipelines).<br>▪ Place, compact and trim.<br>▪ Install pipes and liners.<br>▪ Maintain production machinery, equipment and infrastructure.<br>▪ Rehabilitate borrow pits. | ▪ Crush and screen materials.<br>▪ Batch concrete.<br>▪ Deliver concrete.<br>▪ Maintain production machinery, equipment and infrastructure.<br>▪ Transport of raw materials. | ▪ Mobilise equipment and facilities.<br>▪ Demobilise equipment and facilities.<br>▪ Transport heavy haulage supplies and waste/recycling.<br>▪ Maintain machinery, equipment and infrastructure.<br>▪ Purchase goods and services. |

***Table 1:*** *Environmental Scope of Operations*

## 11.2. NEEDS AND EXPECTATIONS OF INTERESTED PARTIES

### 11.2.1. Regulator

A. The relevant state EPA is responsible for influencing and regulating human activities towards the protection of air and water quality, and the control of pollution, waste, noise and radiation in the state of operation. Exact Contracting is required to complete its activities in accordance with the relevant legislation, and due to the potential impacts holds an SA EPA licence for mobile batching of concrete, waste transport and storage, and a WA EPA Licence for waste transport and interstate carrier. The licences are an enforceable agreement between the relevant EPA and Exact

Contracting, which sets out the minimum acceptable environmental standards to which the Company must operate. An annual return is a requirement of the licences.

11.2.2. **Clients**

A. The nature of mining and civil construction in Australia is such that each client has a different set of requirements for environmental management, which is based on state, territory and Commonwealth legislation, specified environmental licence conditions and the scope of works being performed. There are also different environmental requirements between sites operated by the same client. To accommodate this, there is the need for site environmental management plans to be developed by Exact Contracting to reflect the operations and contract requirements specified by the client.

B. Civil clients may require Exact Contracting to complete relevant environmental approvals (local, state and national). These are generally related to specific legislative requirements and require investigation and analysis under a predetermined statutory framework. In these circumstances, Exact Contracting will act as an agent for the client with final approvals directed to the relevant client entity.

11.2.3. **Certification Body**

A. SAI Global provides external audit certification services to ensure the Company environmental management system is consistent with the requirements of ISO 14001:2015. Retention of certification is contingent on an annual surveillance audit and a re-certification audit every three years on the anniversary of certification.

11.2.4. **Clean Energy Regulator**

A. The Company has an interface with the Clean Energy Regulator through the reporting requirements under the National Greenhouse and Energy Reporting Scheme. Exact Contracting shall record and calculate emissions annually if meeting the relevant thresholds. Corporations registered under Division 3 of Part 2 of the *National Greenhouse and Energy Reporting Act 2007* (Cth) (the NGER Act) are required to provide a report to the Clean Energy Regulator by 31 October each year for the previous eligible financial year relating to:

- Greenhouse gas emissions;
- Energy production; and
- Energy consumption.

From the operation of facilities under the operational control of the corporation and entities that are members of the corporation's group, during that financial year.

11.2.5. **Community**

A. Where Exact Contracting is in close proximity to other dwellings or communities' relevant noise, vibration and dust levels are expected to maintain regulatory compliance and positive/mutually beneficial community relationships. Positive community perception of the business' conduct outside of working hours is also essential for the sustainability of working in populated areas, on rural stations and in mining communities.

11.2.6. **Climate Change**

A. The corporate climate risk assessment has identified that climate change has a relatively low to moderate impact on the needs and expectations of our business's interested parties – with regards

to the businesses environmental management systems. This includes stakeholders such as clients, employees and local communities who are increasingly concerned about climate change. The assessment highlights that adapting to these changing expectations is crucial for maintaining trust and ensuring the long-term viability of our operations. We recognise the importance of integrating these insights into our strategic planning and decision-making processes to better align with the values and priorities of our interested parties.

### 11.3. COMPLIANCE OBLIGATIONS

11.3.1. **General**

A. Legislation and contract specifications are the principal determinants of compliance obligations. The site-specific nature of our operations and mix of short and long-term civil and mining contracts means that each contract will be assessed for the environmental obligations as part of the tender process and formulated into site-specific project environmental management plans and/or procedures. Activities that may pollute or have the potential to pollute the environment will be reviewed for the requirement of EPA licenses. In particular, this will be targeted at activities that involve the production or transport of solid or liquid waste, noise, air emissions or heat production.

11.3.2. **Legal Register**

A. Relevant Commonwealth, state and territory legislation, including Codes of Practice related to environmental management are managed through an external software Workplace Safety Australia, with regular bulletins of changes to relevant environmental legislation.

## 12. ROLES, RESPONSIBILITIES AND AUTHORITIES

### 12.1. PURPOSE

12.1.1. To ensure the responsibilities and authorities of management are clearly defined and that the environmental management system is maintained.

### 12.2. SCOPE

12.2.1. This Environmental Management Plan includes roles, responsibilities, accountabilities, authorities, and reviews associated with the implementation and maintenance of the Company's environmental management system. These roles and responsibilities are in line with those set out in the Company Quality Manual, which must be referenced for more detail.

### 12.3. GENERAL MANAGER - OPERATIONS

12.3.1. **Role**

A. Review and employ capabilities to execute Exact Contracting's plans.

12.3.2. **Responsibilities**

A. Establish overall direction of Exact Contracting.

B. Develop environmental policy in line with Company direction.

C. Monitor and assess environmental management system performance.

D. Address issues identified in environmental management system performance audits.

E. Ensure that business, program, legal, and compliance obligations are identified, analyzed and addressed.
F. Ensure that the environmental management system specifications meet the requirements.
G. Review budget for environmental management system implementation and operation.
H. Involve stakeholders in the development of standards, procedures, and guidelines.
I. Ensure that integration exists between management systems.

12.3.3. **Accountabilities**

A. To regulatory and legislative organisations: for compliance to legal requirements.
B. To organisation managers: for safe, effective, and compliant operations, stewardship of assigned staff, facilities and equipment and the quality of products and services.
C. To clients: for the quality of products and services.
D. To assigned staff: for the quality and safety of their work environment and opportunity for professional growth.

12.3.4. **Authorities**

A. Review and approve budgets for environmental management system.
B. Approve methods for meeting environmental management system requirements.
C. Review environmental management system operations.
D. Hold staff accountable for performance.

## 12.4. PROJECT MANAGER(S)

12.4.1. **Role**

A. Deliver project-specific products and services to the Principal in accordance with contractual requirements.

12.4.2. **Responsibilities**

A. Develop, review, and improve environmental objectives and programs specific to site.
B. Prepare and maintain site Environmental Management Plan.
C. Ensure compliance obligations are met.
D. Ensure safe, effective, and legally compliant operations, preventing pollution, minimizing waste and conserving resources.
E. Ensure continual improvement of Environmental Management Plan.
F. Develop staff capability to meet future needs by building new competencies, maintaining an appropriately trained and motivated staff, and supporting their long-term professional development.
G. Identify client's environmental expectations.
H. Ensure adequate communication of the Environmental Management Plan and environmental management system requirements to team members.
I. Ensure the quality of products and services.
J. Identify environmental hazards on projects and ensure that they are mitigated and can be adequately controlled.
K. Review environmental monitoring and measurement results to determine compliance.
L. Review environmental non-conformances and determine appropriate corrective action.

M. Participate in and provide information at the request of internal and external environmental auditors.

12.4.3. **Accountabilities**

A. To Managing Director for correct and complete implementation of Environmental Management System.

B. To client for successful project completion.

C. To Managers or Supervisors of project team members for information on future project staffing needs.

D. To project team for resources to complete project work, and a safe work environment.

12.4.4. **Authorities**

A. Hold assigned staff accountable for performance.

B. Approve assignment of project staff.

C. Act to meet project quality, budget and schedule.

D. Authorize expenditure of project funds.

E. Manage assigned resources to complete project.

F. Act to ensure safe and environmentally sound project work.

## 12.5. PROJECT ENGINEER(S)

12.5.1. **Role**

A. Plan, design, develop and use new or improved engineering techniques or equipment for the solution and completion of environmental/technical projects.

12.5.2. **Responsibilities**

A. Investigate innovative approaches and techniques for minimizing environmental impacts.

B. Conceptualize and evaluate specifications/plans/designs consistent with environmental procedures, programs, and policies.

C. Investigate options for sampling, testing, and monitoring environmental performance and complete testing where required.

D. Conduct acceptance tests.

E. Specify maintenance needs for environmental programs.

F. Maintain machine/system operations and propose upgrades/improvements.

G. Review other engineering designs.

H. Stay current with state-of-the-art technology.

I. Communicate with and provide on-the-job training to technicians and staff.

J. Monitor progress on the close-out of corrective and preventative action.

K. Ensure all environmental data and records are stored and can be efficiently retrieved.

L. Assist the Project Manager with the review of environmental objectives and programs.

12.5.3. **Accountabilities**

A. To professional staff for providing expert engineering assistance and technique for construction, maintenance and operations.

B. To Project Manager for identifying high level and cost-effective options/solutions for engineering assignments, and for completing allotted share of work on time and at appropriate standard.

C. Providing information and expert assistance (technical staff).

#### 12.5.4. Authorities

A. Take required action to complete technical assignment.
B. Provide feedback on environmental system/project engineering needs and performance.
C. Manage assigned resources for project completion.
D. Identify required training needs to stay current with state-of-the-art technology.

### 12.6. ENVIRONMENTAL MANAGER

#### 12.6.1. Role

A. The Environmental Manager and Environmental Coordinator are responsible for assisting with the implementation and continual management of Exact Contracting's ISO14001:2015 system; assist the Business Development and Technical Services Manager during contract tendering and conducting and reporting results from environmental audits completed on various sites around Australia.

#### 12.6.2. Responsibilities

A. Promote and adhere to all Exact Contracting and client policies and procedures.
B. Support the movement towards zero environmental incidents.
C. Assist in the continual management of the ISO14001:2015 certification.
D. Assist the Business Development Manager when requested.
E. Produce environmental audits relevant to each mine site currently occupied by Exact Contracting.
F. Conduct thorough environmental audits on various mine sites and prepare the associated reports for submission to senior management.
G. Prepare and submit reports to external parties including the EPA and NGER in order to ensure Exact Contracting meets all environmental legislative responsibilities.
H. Provide assistance regarding environmental management to all Exact Contracting HSE&T Coordinators.
I. Complete environmental risk assessments during all phases of Exact Contracting's projects to ensure regular monitoring, control, and compliance.
J. Abide by and follow all high-risk work policies, procedures, and safe operating procedures.
K. Actively contributes to Exact Contracting Corporate and Project objectives by supporting sound WHS and environmental management.
L. Assist all projects with the development and implementation of the Environmental Management Plan.

#### 12.6.3. Accountabilities

A. Reports to the Operations Manager.
B. Take required action to ensure all operations maintain compliance.
C. Provide feedback on environmental system/project needs and performance.
D. Manage assigned resources to maintain a safe, competent and compliant workforce.
E. Identify and recommend required training needs to stay current with state-of-the-art technology.

## 12.7. ENVIRONMENTAL COORDINATOR(S)

### 12.7.1. Role

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F. Conduct thorough environmental audits on various mine sites and prepare the associated reports for submission to senior management.
G. Prepare and submit reports to external parties including the EPA and NGER in order to ensure Exact Contracting meets all environmental legislative responsibilities.
H. Provide assistance regarding environmental management to all Exact Contracting HSE&T Coordinators.
I. Complete environmental risk assessments during all phases of Exact Contracting's projects to ensure regular monitoring, control and compliance.
J. Abide by and follow all high-risk work policies, procedures and safe operating procedures.
K. Actively contributes to Exact Contracting Corporate and Project objectives by supporting sound WHS and environmental management.
L. Assist all projects with the development and implementation of the Environmental Management Plan.

### 12.7.3. Accountabilities

A. Reports to the Environmental Manager and Operations Manager.
B. Take required action to ensure all operations maintain compliance.
C. Provide feedback on environmental system/project needs and performance.
D. Manage assigned resources to maintain a safe, competent and compliant workforce.
E. Identify and recommend required training needs to stay current with state-of-the-art technology.

## 12.8. NATIONAL SAFETY TRAINING AND QUALITY MANAGER

### 12.8.1. Role

A. Ensure all operational activity is undertaken in a safe and compliant manner and to the highest quality standards, including maintaining and reviewing SOPs, competency of operators, and provide overall direction for the HSE&T Coordinators to meet and exceed Company and client environmental Key Performance Indicators (KPIs).

### 12.8.2. Responsibilities

A. Provide specialist advice and services on all work, health, safety, environment, and training issues.

B. Assist with the preparation and maintenance of environmental management plans.
C. Ensure regulatory compliance for safety, training and environment.
D. Ensure safe, effective, and legally compliant operations, preventing pollution, minimizing waste and conserving resources.
E. Ensure continual improvement of all HSE&T management systems.
F. Provide clear direction to all safety and training personnel including environmental awareness.
G. Develop staff capability to meet future needs by building new competencies, maintaining an appropriately trained and motivated staff, and supporting their long-term professional development.
H. Develop a training needs analysis and appropriate training schedules for staff.
I. Identify clients' expectations.
J. Achieve and exceed Company and client safety, training and environment KPIs and report monthly.
K. Communicate the Environmental Management Plan and environmental management system requirements to team members, including the discussion of these issues as part of the scheduled health, safety, environment, and training teleconference.
L. Identify hazards on projects and ensure that they are mitigated and can be adequately controlled.

12.8.3. **Accountabilities**

A. To Project Manager for the implementation of the Environmental Management Plan.
B. To the Client to maintain a safe and compliant operating environment, achieving or exceeding all KPIs.
C. To Managers or Supervisors of project team members to support the operation through timely advice and direction on all environmental matters.
D. To project team to be adequately informed, trained and provide competent resources to maintain a safe operating environment.

12.8.4. **Authorities**

A. Take required action to ensure all operations maintain compliance.
B. Provide feedback on environmental system/project needs and performance.
C. Manage assigned resources to maintain a safe, competent and compliant workforce.
D. Identify and recommend required training needs to stay current with state-of-the-art technology.

## 12.9. HEALTH, SAFETY, ENVIRONMENT AND TRAINING COORDINATOR (HSE&T)

12.9.1. **Role**

A. Ensure all operational activity is undertaken in a safe and compliant manner and to the highest quality standards, including maintaining and reviewing SOPs and competency of operators. Meet and exceed Company environmental KPIs.

12.9.2. **Responsibilities**

A. Provide specialist advice and services on all work, health, safety, environment and training issues.
B. Assist with the preparation and maintenance of environmental management plans including the monthly site environmental report, environmental inspections, training and awareness.
C. Ensure regulatory compliance for safety, training and environment.

D. Ensure safe, effective, and legally compliant operations, preventing pollution, minimizing waste and conserving resources.
E. Ensure continual improvement of all HSE&T management systems.
F. Develop a training needs analysis and appropriate training schedules for staff.
G. Achieve and exceed company and client safety, training and environment KPIs and report monthly.
H. Communicate the Environmental Management Plan and environmental management system requirements to team members, including the discussion of these issues through the scheduled health, safety, environment and training teleconference.
I. Identify environmental hazards at projects and ensure that they are mitigated and can be adequately controlled.

12.9.3. **Accountabilities**

A. To Project Manager for the implementation of the Environmental Management Plan.
B. To Operations Manager to maintain a safe and compliant operating environment including achieving or exceeding all KPIs.
C. To Managers or Supervisors of project team members: support the operation through timely advice and direction on all environmental matters.
D. To project team: adequately informed, trained and competent resources to maintain a safe operating environment.

12.9.4. **Authorities**

A. Take required action to ensure all operations maintain compliance.
B. Provide feedback on environmental system/project needs and performance.
C. Manage assigned resources to maintain a safe, competent and compliant workforce.
D. Identify and recommend required training needs to stay current with state of the art technology.

## 12.10. SUPERVISOR(S)

12.10.1. **Role**

A. An individual assigned to direct the work of staff.

12.10.2. **Responsibilities**

A. Recommend staffing actions.
B. Develop capabilities of staff and other resources by ensuring that staff are competent, trained and qualified for assigned work, and by managing staff, information, facilities, and equipment.
C. Assign work to qualified staff with authorities to meet accountabilities.
D. Advise and assist staff in developing solutions to customer needs.
E. Monitor staff progress on assigned work.
F. Ensure that staff complies with work policies, Codes of Practice, standards and procedures and other regulations.
G. Help staff identify their role in the overall strategy and direction of the Company.
H. Provide high quality performance feedback to individual staff members.
I. Ensure that staff are effectively utilized, rewarded and motivated.
J. Support the professional development of staff consistent with Company and personal development goals.

K. Ensure mitigation for all identified hazards.

12.10.3. **Accountabilities**

A. To assigned staff for resource management and capability development, and for the quality and safety of their work environment.

B. To manager for stewardship of assigned resources, and for ensuring quality of products and services.

12.10.4. **Authorities**

A. Act to ensure safe and effective operations.

B. Accept work.

C. Expend assigned funds.

D. Assign work to staff.

E. Hold staff accountable for performance.

# 13. ENVIRONMENTAL AND SUSTAINABILITY PLANNING

## 13.1. SIGNIFICANT ENVIRONMENTAL ASPECTS AND IMPACTS

### 13.1.1. Assessment Framework

A. Significant environmental aspects and impacts are derived using a life-cycle perspective assessment of the Exact Contracting Group services and activities with environmental impacts determined according to the activity inputs and outputs. The significance of environmental impacts for each aspect depends upon the severity, duration and scale of the environmental impact. Each potential environmental impact is rated according to the environmental severity (low, medium, high) and scale/duration (low, medium, high) using defined criteria. The environmental significance matrix is used to score the significance based on a priority rating from one (1) (highest and most significant impact) to six (6) (lowest and least significant risk). Allocation of resources for the control of significant environmental aspects and impacts is priority driven. This strategic assessment of impacts provides a foundation and source of potential environmental risks and opportunities for the Company and project environmental risk assessment(s).

B. Aspects, Impacts and their specific controls are further elaborated on in the Environmental programs (Section 25 – onwards) of this document.

| Low Environmental Severity | Medium Environmental Severity | High Environmental Severity |
|---|---|---|
| Limited disturbance to environment from operations. | Some disturbance due to operations but does not significantly change the ecological functioning and the state of land, water and air systems. | High level of disturbance to environment, which may cause significant change to the original ecological system. |

***Table 2:*** *Environmental Severity Criteria*

| Low Duration/Scale | Medium Duration/Scale | High Duration/Scale |
|---|---|---|
| **Land** | | |
| Impact of short exposure time (<2 hours) confined to work area with no risk of escape. | Impact of moderate exposure time (2-12 hours) which has the potential to affect the entire project site. | Impact of long exposure time (>12 hours) that may extend beyond the project site. |
| **Water** | | |
| Impact of short exposure time (<1 hour) confined to a natural or build drainage in the immediate vicinity of the work area with no risk of escape across the project site. | Impact of moderate exposure time (1-6 hours) which has the potential to affect the natural or build drainage network across the entire project site. | Impact of long exposure time (>6 hours) which has the potential to affect a natural or built drainage network beyond the project site. |
| **Air** | | |
| Impact of short exposure time (<12 hours) confined to work area. | Impact of moderate exposure time (12-48 hours) which has the potential to affect the entire project site. | Impact of long exposure time (>48 hours) that may extend beyond the project site. |

***Table 3:*** *Environmental Duration and Scale Criteria*

| Environment Severity | | | | |
|---|---|---|---|---|
| | High | High Severity **Priority 4** Low Duration/Scale | High Severity **Priority 2** Medium Duration/Scale | High Severity **Priority 1** High Duration/Scale |
| | Medium | Medium Severity **Priority 5** Low Duration/Scale | Medium Severity **Priority 3** Medium Duration/Scale | Medium Severity **Priority 2** High Duration/Scale |
| | Low | Low Severity **Priority 6** Low Duration/Scale | Low Severity **Priority 5** Medium Duration/Scale | Low Severity **Priority 4** High Duration/Scale |
| | | Low | Medium | High |

***Figure 2:*** *Aspect Risk*

### 13.1.2. Quarry Management and Mining Services

| Aspect | Result | Input | Output | Potential Impact | Significance Rating |
|---|---|---|---|---|---|
| Drill and blast | Carbon dioxide (CO2) | | ✓ | Climate change | 2 |
| | Carbon monoxide (CO) | | ✓ | Climate change | 2 |
| | Nitrogen oxides (NOx) | | ✓ | Climate change | 2 |
| | Sulphur oxides (SOx) | | ✓ | Climate change | 2 |
| | Noise and vibration | | ✓ | Community disturbance | 2 |
| Load, haul, crush and stockpile ore and waste rock | Potential Acid Forming (PAF) rock | | ✓ | Acidification of surface and groundwater | 2 |
| | Potential Acid Forming (PAF) rock | | ✓ | Ecotoxicity | 2 |
| Operate and maintain production machinery, equipment and infrastructure, machinery parts, spares and workshop consumables | Carbon dioxide (CO2) | | ✓ | Climate change | 2 |
| | Carbon monoxide (CO) | | ✓ | Climate change | 2 |
| | Nitrogen oxides (NOx) | | ✓ | Climate change | 2 |
| | Sulphur oxides (SOx) | | ✓ | Climate change | 2 |
| | Hydrocarbon contaminated soil | | ✓ | Water contamination | 2 |
| | Wash bay water and sediment | | ✓ | Water contamination | 2 |
| | Spills | | ✓ | Water and land contamination | 2 |
| | Spills | | ✓ | Ecotoxicity | 2 |
| | Machinery parts, spares and workshop consumables | ✓ | | Resource depletion | 2 |
| Survey and clear | Exposed landforms | | ✓ | Sedimentation | 3 |
| | Traffic movement | | ✓ | Weed dispersal | 3 |
| Excavate open pit | Water | | ✓ | Aquifer contamination | 3 |
| | Water | | ✓ | Surface water contamination | 3 |
| Operate and maintain production machinery, equipment and infrastructure | Diesel | ✓ | | Resource depletion | 3 |
| | Lubricants (oil and grease) | ✓ | | Resource depletion | 3 |
| | Nitrogen | ✓ | | Resource depletion | 3 |
| | Tyres | ✓ | | Resource depletion | 3 |
| | Waste (hazardous) | | ✓ | Landfill | 3 |
| | Waste (hazardous) | | ✓ | Legacy | 3 |

| Aspect | Result | Input | Output | Potential Impact | Significance Rating |
|---|---|---|---|---|---|
| | Waste (hazardous) | | ✓ | Spills | 3 |
| | Waste (hazardous) | | ✓ | Wildlife illness and/or death | 3 |

### 13.1.3. Civil & Agricultural Contracting

| Aspects | Result | Input | Output | Potential Impact | Significance Rating |
|---|---|---|---|---|---|
| Operate and maintain production machinery, equipment and infrastructure | Wash bay water and sediment | | ✓ | Water contamination | 2 |
| | Wash bay water and sediment | | ✓ | Ecotoxicity | 2 |
| | Noise and vibration | | ✓ | Community disturbance | 2 |
| | Carbon dioxide (CO2) | | ✓ | Climate change | 2 |
| | Carbon monoxide (CO) | | ✓ | Climate change | 2 |
| | Nitrogen oxides (NOx) | | ✓ | Climate change | 2 |
| | Sulphur oxides (SOx) | | ✓ | Climate change | 2 |
| | Spills | | ✓ | Ecotoxicity | 2 |
| | Spills | | ✓ | Water and land contamination | 2 |
| | Machinery parts, spares and workshop consumables | ✓ | | Resource depletion | 2 |
| Excavate pipeline trenches | Deep trenches | | ✓ | Exposure of unsurvey waste dumps (contamination) | 2 |
| Operate and maintain production machinery, equipment and infrastructure | Diesel | ✓ | | Resource depletion | 3 |
| | Lubricants (oil and grease) | ✓ | | Resource depletion | 3 |
| | Tyres | ✓ | | Resource depletion | 3 |
| | Waste (hazardous) | | ✓ | Landfill | 3 |
| | Waste (hazardous) | | ✓ | Legacy | 3 |
| | Waste (hazardous) - spills | | ✓ | Land contamination | 3 |
| | Waste (hazardous) | | ✓ | Wildlife illness and/or death | 3 |
| | Noise and vibration | | ✓ | Land instability | 3 |

| Aspects | Result | Input | Output | Potential Impact | Significance Rating |
|---|---|---|---|---|---|
| Survey and clear construction and borrow pit footprint | Soil stockpile | | ✓ | Weed incursion | 3 |
| | Traffic movement | | ✓ | Weed dispersal | 3 |
| Excavate, load, haul, condition and place materials | Water | | ✓ | Aquifer contamination | 3 |
| | Water | | ✓ | Surface water contamination | 2 |
| Excavate pipeline trenches | Noise and vibration | | ✓ | Land instability | 3 |
| | Dust emission | | ✓ | Wildlife illness and/or death | 3 |
| | Water | | ✓ | Aquifer contamination | 3 |
| | Water | | ✓ | Surface water contamination | 3 |
| Install pipe, pumps and liners and other fixed infrastructure | PVC and polypropylene pipe | ✓ | | Resource depletion | 3 |
| | PVC and polypropylene pipe | ✓ | | Embodied energy | 3 |
| | Geo-membrane liner | ✓ | | Resource depletion | 3 |
| | Geo-membrane liner | ✓ | | Embodied energy | 3 |
| | Noise and vibration | | ✓ | Land instability | 3 |
| | Deep trenches | | ✓ | Water infiltration | 3 |

### 13.1.4. **Concrete Batching and Supply**

| Aspect | Result | Input | Output | Potential Impact | Significance Rating |
|---|---|---|---|---|---|
| Crush, screen and stockpile materials | Cement | ✓ | | Resource depletion | 1 |
| | Cement | ✓ | | Embodied energy | 1 |
| Batch concrete | Cement | ✓ | | Embodied energy | 1 |
| Operate and maintain production machinery, equipment and infrastructure | Hydrocarbon contaminated soil | | ✓ | Water contamination | 1 |
| | Wash bay water and sediment | | ✓ | Water contamination | 1 |
| | Wash bay water and sediment | | ✓ | Ecotoxicity | 2 |
| | Hydrocarbon contaminated soil | | ✓ | Ecotoxicity | 2 |
| | Spills | | ✓ | Ecotoxicity | 2 |

| | | | | | |
|---|---|---|---|---|---|
| | Spills | | ✓ | Water and land contamination | 2 |
| | Machinery parts, spares and workshop consumables | ✓ | | Resource depletion | 2 |
| Batch concrete | Carbon dioxide (CO2) | | ✓ | Climate change | 2 |
| | Carbon monoxide (CO) | | ✓ | Climate change | 2 |
| | Nitrogen oxides (NOx) | | ✓ | Climate change | 2 |
| | Sulphur oxides (SOx) | | ✓ | Climate change | 2 |
| | Water | ✓ | | Resource depletion | 3 |
| | Cement | ✓ | | Resource depletion | 3 |
| | Synthetic and metal fibers | ✓ | | Resource depletion | 3 |
| | Diesel | ✓ | | Resource depletion | 3 |
| | Electricity | ✓ | | Resource depletion | 3 |
| Operate and maintain production machinery, equipment and infrastructure | Diesel | ✓ | | Resource depletion | 3 |
| | Lubricants (oil and grease) | ✓ | | Resource depletion | 3 |
| | Tyres | ✓ | | Resource depletion | 3 |
| | Carbon dioxide (CO2) | | ✓ | Climate change | 3 |
| | Carbon monoxide (CO) | | ✓ | Climate change | 3 |
| | Nitrogen oxides (NOx) | | ✓ | Climate change | 3 |
| | Sulphur oxides (SOx) | | ✓ | Climate change | 3 |
| | Waste (non-hazardous) | | ✓ | Spills | 3 |
| | Waste (hazardous) | | ✓ | Landfill | 3 |
| | Waste (hazardous) | | ✓ | Legacy | 3 |
| | Waste (hazardous) | | ✓ | Spills | 3 |

### 13.1.5. Burton Transport, Maintenance and Purchasing Depot, and Support Services

| Aspect | Result | Input | Output | Potential Impact | Significance Rating |
|---|---|---|---|---|---|
| Transport, operate and maintain production machinery, equipment and infrastructure | Hydrocarbon contaminated soil | | ✓ | Water contamination | 1 |
| | Wash bay water and sediment | | ✓ | Water contamination | 2 |
| | Wash bay water and sediment | | ✓ | Ecotoxicity | 2 |
| | Effluent | | ✓ | Water contamination | 2 |

| | | | | | |
|---|---|---|---|---|---|
| | Effluent | | ✓ | Eutrophication | 2 |
| | Carbon dioxide (CO2) | | ✓ | Climate change | 2 |
| | Carbon monoxide (CO) | | ✓ | Climate change | 2 |
| | Nitrogen oxides (NOx) | | ✓ | Climate change | 2 |
| | Sulphur oxides (SOx) | | ✓ | Climate change | 2 |
| | Machinery parts, spares and workshop consumable | ✓ | | Resource depletion | 2 |
| | Electricity | ✓ | | Resource depletion | 2 |
| | Diesel | ✓ | | Resource depletion | 3 |
| | Lubricants (oil and grease) | ✓ | | Resource depletion | 3 |
| | Tyres | ✓ | | Resource depletion | 3 |
| | Abrasive blasting garnet | ✓ | | Resource depletion | 3 |
| | Water | ✓ | | Resource depletion | 3 |
| | Hydrocarbon contaminated soil | | ✓ | Ecotoxicity | 3 |
| | Waste (hazardous) | | ✓ | Landfill | 3 |
| | Waste (hazardous) | | ✓ | Legacy | 3 |

## 13.2. RISK ASSESSMENT PROCESSES

13.2.1. Environmental risk assessments will be completed at three levels (company, project/site and task) and will consider the significant environment impacts, compliance obligations, needs, and expectations of interested parties pertinent to each of those levels. In conjunction with the overall requirements of the Exact Contracting's Corporate Health and Safety Management Plan and Environmental Management Plan, Exact Contracting shall establish a register of all environmental risks.

13.2.2. Exact Contracting shall ensure:

A. The project environmental risk assessment, in conjunction with the overall health, safety and environment (HSE) risk assessment, is reviewed regularly with the workforce and updated as required throughout the project term.

B. Environmental, in conjunction with overall HSE, risk assessment controls and any relevant training are implemented prior to an activity commencing.

C. Environmental standards, in conjunction with overall HSE standards, procedures and Task Hazard Analysis (THA) that may be required for work activities are communicated. These include:

- Hazard identification and risk assessment;
- Document control and records management;
- Inspection and auditing of workplaces;
- Compliance obligations;
- Air quality and emissions management;

- Biodiversity and cultural heritage management;
- Noise and vibration;
- Amenity management;
- Sustainable resource management;
- Spill and pollution prevention;
- Waste and recycling management;
- Water quality management;
- Environmental incident prevention, preparedness, and response; and
- Legacy.

## 13.3. PROCESS FOR HAZARD AND RISK MANAGEMENT

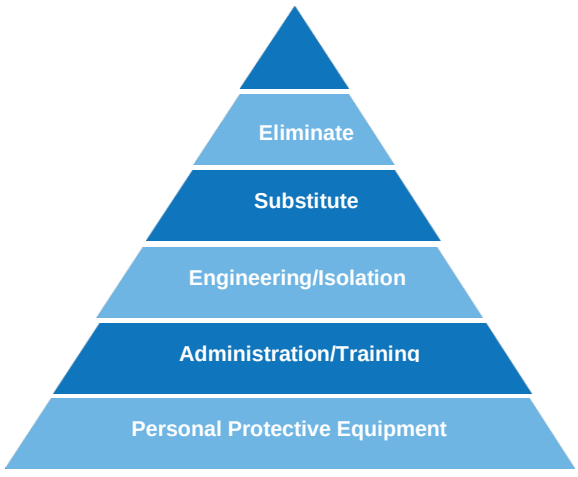
13.3.1. Exact Contracting shall apply hazard and risk management processes throughout the contract. This shall involve:

A. Defining the job;
B. Identifying the hazards;
C. Assessing the risk;
D. Implementing control measures (controlling the risk); and
E. Monitoring and reviewing the process.

## 13.4. HIERARCHY OF CONTROLS

13.4.1. Exact Contracting shall ensure that all risk and hazard controls are applied in accordance with the "Hierarchy of Controls" process.

13.4.2. Control measures to eliminate or minimise the risk shall be considered and implemented in the following order of priority:




**Eliminate:** The complete elimination of the hazard.
**Substitute:** Replacing the material or process with a less hazardous one.
**Redesign:** Redesign the equipment or work process.
**Separate:** Isolating the hazard by guarding or enclosing it.

**Individuals have no choice**

**Individuals have choices**

| | |
|---|---|
| **Administrate:** | Providing control such as training, procedures, signage etc. |
| **Personal Protective Equipment:** | Use appropriate and properly fitted PPE where other controls are not practical. |

### 13.5. SAFE WORK METHOD STATEMENT (SWMS) OR AS PER SITE REQUIREMENTS

13.5.1. A SWMS shall be developed by work teams prior to commencing any task that is not already covered by a procedure or where a task varies from the standard work instruction. The SWMS or similar shall be used to list the specific job steps, identify potential hazards associated with job step (including the immediate work environment) and appropriate control measures that mitigate the identified hazards (using the 'Hierarchy of Controls' method).

13.5.2. SWMSs or similar shall be developed by the personnel conducting the task, signed by the work crew and reviewed prior to commencing the task. The completed SWMS or similar shall be submitted to the Exact Contracting Supervisor for review and approval. Exact Contracting Project Manager, Supervisors and HSE&T Coordinators shall be responsible for monitoring and auditing SWMS or similar regularly throughout the project.

13.5.3. To align with identifying safety hazards, these hazards also extend to identifying environmental hazards in the work place. All potential environmental hazards shall be assessed through a SWMS prior to any task that is not already covered by a procedure.

### 13.6. PLANNING FRAMEWORK

13.6.1. Projects that are scheduled to operate for greater than three months in length or on request from a client will have a site environmental plan developed. These plans will work in conjunction with this plan, the site principal's environmental management procedures and will include a site environmental risk assessment. Key elements of the plan are designed to localise company strategy and align to the license conditions and operational procedures of the client for the site. Compliance obligations, legislation, policies, procedures, environmental programs, together with an analysis of the key environmental service deliverables is provided in the plan for implementation by the Project Manager.

### 13.7. MANAGEMENT OF CHANGE

13.7.1. Exact Contracting shall follow the management of change (WHSPRO-022) process in conjunction with the Hazard Identification and Risk Assessment Procedure (WHSPRO-003). These processes will ensure that proposed changes do not give rise to unacceptable risks to health, safety, assets and/or the environment.

13.7.2. The change management process shall aim to ensure the following:

A. Changes are identified and recognised;
B. All relevant parties are consulted;
C. Careful consideration is given to managing the risks associated with any change;
D. Due diligence can be shown to have taken place;
E. A reduction in the number of unsatisfactory or unnecessary changes;
F. The involvement of the right people in the change process; and
G. All statutory requirements are met.

13.7.3. In conjunction with the requirements of the Exact Contracting Health and Safety Management Plan, Exact Contracting shall ensure that all tasks are appropriately assessed with regard to their potential impact on the environment.

## 14. COMPETENCE, TRAINING AND AWARENESS

The Environmental Manager and Environmental Coordinator are the key positions for planning, implementation, review and continuous improvement of the Environmental Management System. Qualifications, attributes and experience for each of the positions are provided in the relevant position description. Exact Contracting shall ensure that all personnel performing activities with the potential to impact the environment will have suitable qualifications, job-specific knowledge base and adequate training. This includes, but is not limited to:

- Graduate and postgraduate environmental qualifications;
- Vocation education and training (TAFE and other Registered Training Organisations);
- On-the-job training;
- Technical courses; and
- Attendance at conferences, seminars, and consultation sessions.

### 14.1. TRAINING NEEDS ANALYSIS

14.1.1. A register of employees, which details experience, qualifications and competencies will be documented using the Lucidity Human Resources function.

14.1.2. A training needs analysis will be completed periodically for environmental positions by the Environmental Manager and outcomes discussed by senior management at the management review meeting.

14.1.3. The Training Needs Analysis will take into consideration risks and opportunities derived from significant environmental impacts, compliance obligations and the needs and expectations of interested parties.

### 14.2. ENVIRONMENTAL AWARENESS

14.2.1. All new staff shall be introduced to environmental impacts, actions and policy via the Exact Contracting online Corporate Induction.

14.2.2. Internal basic environmental awareness training shall be included in the new starter induction process.

14.2.3. Internal intermediate and advanced environmental awareness training will be available to staff with environmental deliverables or those staff who request additional training.

14.2.4. A monthly environmental focus topic will be selected based on the current internal and external situation and be delivered in a toolbox talk format to all staff at the daily pre-shift meeting.

14.2.5. Internal basic environmental awareness training once complete shall not expire due to the monthly focus topics annually including each key component of the basic environmental awareness training.

## 15. COMMUNICATION

All communications and consultation will be completed in accordance with the Environmental Communications Procedure (ENVPRO-002) and Stakeholder Impact Analysis Procedure (CORPRO-008).

## 16. DOCUMENT CONTROL

16.1.1. All environmental documents are subject to management under the company Document Control Procedure (DCPRO-001) and applies to all documents, whether internal or external, used by Exact Contracting within the environmental management system.

## 17. OPERATIONAL CONTROL

### 17.1. PURPOSE

17.1.1. To ensure implementation of the environment management system and Environmental Management Plan is accomplished through the establishment and maintenance of operational procedures and controls.

### 17.2. SCOPE

17.2.1. This section applies to the management of the operational workings of the Environmental Management System. It applies to all work that directly affects the environmental integrity, prior to, during and after construction.

### 17.3. PROCEDURE

17.3.1. Each process, which impacts on the environment, shall be completed in accordance with Section 11 of this document. If there is no applicable method prepared for a specific task, then one shall be written and submitted through to the document control process and updated in this document.

## 18. MONITORING AND MEASUREMENT

### 18.1. PURPOSE

18.1.1. To ensure that appropriate and accurate data is collected to measure performance and assess the significance of environmental aspects.

### 18.2. SCOPE

18.2.1. This section applies to the collection of data and information, and analysis of information to track performance, relevant operational controls and conformance with the organisation’s environmental objectives. Monitoring includes (but is not limited to):

| Program | What We Measure |
|---|---|
| Air quality and emissions management | ▪ Fuel, energy, oil, grease, explosives and paint consumption.<br>▪ Visual dust observations.<br>▪ Putrescible waste.<br>▪ Environmental improvements. |
| Noise, vibration and amenity management | ▪ Audiometric tests.<br>▪ Noise monitoring equipment calibration.<br>▪ Environmental improvements. |
| Sustainability | ▪ Recyclable materials diverted from landfill.<br>▪ Waste Tracking Certificates and Forms.<br>▪ Environmental improvements.<br>▪ Renewable energy production. |
| Biodiversity and heritage management | ▪ Site environmental condition.<br>▪ Topsoil stockpiled.<br>▪ Land rehabilitated.<br>▪ Vegetation clearance.<br>▪ Permits issued.<br>▪ Fauna interactions.<br>▪ Cultural heritage observations.<br>▪ Visual dust observations.<br>▪ Hydrocarbon and chemical spills.<br>▪ Environmental improvements. |
| Waste management | ▪ Site environmental condition.<br>▪ Putrescible waste.<br>▪ Recyclable materials diverted from landfill.<br>▪ Waste Tracking Certificates and Forms.<br>▪ Hydrocarbon and chemical spills.<br>▪ Soil and sediment disposal<br>▪ Environmental improvements. |
| Water management | ▪ Site environmental condition.<br>▪ Hydrocarbon and chemical spills.<br>▪ Water use.<br>▪ Water quality.<br>▪ Wastewater pH & flow rates.<br>▪ Environmental improvements. |
| Environmental incident prevention, preparedness and response | ▪ Hydrocarbon and chemical spills. |

***Table 4:*** *Environmental Monitoring and Measurement*

18.2.2. The environmental management plan shall be compatible with the requirements of ISO14001:2015 environmental management systems. Monitoring and measurement shall be completed in accordance with state legislation and any specific licenses issued to the company, together with the principal's contract requirements.

## 18.3. PROCEDURE

### 18.3.1. Sampling and analysis of water and soils

A. Establish water and soil monitoring program as required by contract specifications and in collaboration with principal.

B. Chemical, physical and biological indicators, which are relevant to the monitoring objectives of the monitoring program, must be established.

C. The site must be assessed to determine the number and types of samples needed for an accurate representation.

D. The program must be documented in the site Environmental Management Plan, a sub-plan or as a procedure.

E. Samples must be appropriately labelled, preserved, stored and transported for analysis.

F. Field sampling of water and soil must include hazard assessment and the use of appropriate personal protective equipment (PPE) whilst aligning with the Environmental Hygiene Procedure.

G. Where laboratory analysis is required, this must be completed by a National Association of Testing Authorities (NATA) accredited laboratory with appropriate chain of custody, certificate of quality assurance and certificate of analysis.

H. Information from the results must be interpreted to assess conformance against the relevant standards or licencing conditions and determine strategies for action. In some cases, specialist advice may need to be sought from chemists, site contamination consultants, microbiologists, or hydro geologists for an understanding of the behaviour of pollutants in different elements of the environment.

I. Staff completing the sampling must be competent in the collection, preservation, storage and transport of samples.

### 18.3.2. Sampling and analysis of air particulates

A. Establish air and dust monitoring program as required by contract specifications and in collaboration with principal.

B. Chemical and physical indicators, which are relevant to the monitoring objectives of the monitoring program, must be established.

C. The site must be assessed to determine the number and types of samples needed for an accurate representation. This includes the requirement for long-term automatic monitoring.

D. The program must be documented in the site Environmental Management Plan, a sub-plan or as a procedure.

E. Samples must be appropriately labelled, preserved, stored and transported for analysis.

F. Field sampling of dust must include hazard assessment and the use of appropriate personal protective equipment (PPE).

G. Where laboratory analysis is required, this must be completed by a National Association of Testing Authorities (NATA) accredited laboratory with appropriate chain of custody, certificate of quality assurance and certificate of analysis.

H. Information from the results must be interpreted to assess conformance against the relevant standards or licencing conditions and determine strategies for action. In some cases, specialist advice may need to be sought from relevant specialists.

I. Staff completing the sampling must be competent in the collection, preservation, storage, and transport of samples.

18.3.3. **Noise and Vibration Monitoring**

A. Establish noise and vibration monitoring program as required by contract specifications and in collaboration with principal.

B. The site must be assessed to determine the number and types of samples needed for an accurate representation. This includes the requirement for long-term automatic monitoring.

C. The program must be documented in the site Environmental Management Plan, a sub-plan or as a procedure.

D. Machinery will be subject to audiometric testing according to relevant standards.

E. Information from the results must be interpreted to assess conformance against the relevant standards or licencing conditions and determine strategies for action. In some cases, specialist advice may need to be sought from relevant specialists.

F. Staff completing the sampling and testing must be competent in the use of audiometric and vibration testing equipment.

G. Calibration of equipment will be completed by a National Association of Testing Authorities (NATA) accredited organisation.

18.3.4. **Performance Reports**

A. Each month, data relating to KPIs shall be collected and collated for project sites and consolidated for the whole company.

B. To ensure appropriate stakeholders are adequately informed of relevant environmental performance a range of reports shall be prepared including:

- Board reports;
- Annual Internal Audit Report (internal audit reports, self-checks, compliance obligations audits);
- Management reports (sustainability, waste tracking, condition reports);
- Statutory reports.

18.3.5. **Site Environmental Condition and Ground Disturbance**

A. Individual site risk assessments shall determine whether environmental condition survey or environmental condition reports are necessary.

B. Site environmental conditions will be surveyed (ENVFRM-007) or reported at project commencement and prior to demobilisation. The following data will be recorded:

- Observations of previous disturbance;
- Observation of current erosion;
- Observations of current sedimentation and drainage;

- Evidence of spills and litter;
- General condition and health of vegetation adjacent to area of operation;
- Photographic and/or videography reference material.

C. Ground disturbance on any site for the purpose of clearing, grubbing or borrow pit excavation will be subject to the principal's ground disturbance permit procedures. Data collected and records to be retained will include (but not limited to):

- Permit conditions;
- Fauna and flora of conservation significance located in the area, including the extent of any exclusion zones;
- Drainage and detention structures;
- Clearance and disturbance areas/boundaries;
- Volumes of biomass, topsoil and other material removed/stockpiled;
- Maps and technical drawings;
- Weed incursions;
- Area(s) rehabilitated;
- Photographs;
- Dash camera and UAV (Unmanned Aerial Vehicle) videography.

18.3.6. **Waste Recycling**

A. All waste and recyclable materials must be measured so that the Company can make a determination on the amount of material which is being diverted from landfill.

B. A receipt in the form of a waste transport certificate, waste tracking form or internal waste transfer docket must reflect the type and amount of controlled (listed waste).

C. Putrescible waste and recyclable materials such as paper, cardboard, plastics, ferrous metal, and wood must be recorded or estimated in instances where amounts are not receipted by waste contractors.

## 19. CONTROL OF NON-CONFORMANCES

### 19.1. PURPOSE

19.1.1. To ensure non-conformances are identified and prevented from compromising the integrity of the environment.

### 19.2. SCOPE

19.2.1. This section applies to all non-conforming products encountered during works and details the procedure for controlling environmental non-conformances and preventing the unintended breach of guidelines and regulations.

### 19.3. PROCEDURE

19.3.1. Identify environmental non-conformance through monitoring and measurement.

19.3.2. Refer to Exact Contracting's intranet Lucidity.

19.3.3. Record details of non-conformance on Exact Contracting's intranet Lucidity *Incident or Hazard Report.*

19.3.4. Review non-conformance to determine:

A. How did the non-conformance occur?

B. Can the non-conformance be accepted without alteration?

C. Can the non-conformance be remedied to prevent further breach of regulations?

D. Is there the likelihood of a fine or other penalty involved with the non-conformance?

19.3.5. Record proposed disposition or corrective action on Exact Contracting's intranet Lucidity.

19.3.6. A Hold Point shall apply to non-conforming products until superintendent's permission to proceed is formally received.

19.3.7. Maintain a register of environmental non-conformances using Exact Contracting's intranet Lucidity.

### 19.4. REFERENCE

19.4.1. Lucidity Environmental and Hazard Management Function - Monitoring and Measurement and Corrective and Preventative Action.

## 20. CORRECTIVE AND PREVENTATIVE ACTION

### 20.1. PURPOSE

20.1.1. To ensure the causes of actual or potential non-conformances are controlled using the hierarchy of control process.

### 20.2. SCOPE

20.2.1. This section applies to all procedures, processes, work operations and designs associated with construction activities and aims to correct and prevent recurrence of environmental non-conformances encountered during construction.

### 20.3. PROCEDURE

20.3.1. Identify shortcomings in the process, work operations, procedures, and designs.

20.3.2. Shortcomings are identified by analysis of non-conformances, audits and monitoring and measurements.

20.3.3. Refer to Exact Contracting Standard Hazard/Incident report on Lucidity.

20.3.4. Details of Corrective/Preventative action is recorded on Hazard/Incident and catalogued on Exact Contracting's intranet Lucidity.

### 20.4. REFERENCE

20.4.1. Exact Contracting's standard hazard/incident report on Lucidity.

# 21. RECORDS

## 21.1. PURPOSE

21.1.1. To maintain records to verify conformance with all elements of the Environmental Management System.

## 21.2. SCOPE

21.2.1. This procedure applies to all records associated with environmental and quality management, including but not limited to:

A. Legal and compliance obligations;
B. Environmental risk register;
C. Site environmental management plans;
D. Monthly environmental inspections;
E. Monthly environmental reports;
F. Senior management and board reports;
G. Internal environmental audit;
H. Preventative and corrective action;
I. Environmental incidents and investigations;
J. Environmental improvements;
K. Emissions reports;
L. Environmental engineering designs;
M. Equipment calibration results;
N. Training records;
O. Sample and test results.

## 21.3. PROCEDURE

21.3.1. Records will be maintained within the Exact Contracting Lucidity system.

21.3.2. Project sites will maintain an environmental folder on the site server.

21.3.3. Ensure all procedures are properly maintained to allow for traceability of required records as per Document Control Procedure (DCPRO-001).

21.3.4. Authorised signatories include:

A. Operations Manager;
B. Project Manager;
C. Project Engineer;
D. Environment Manager;
E. Environment Coordinator;
F. National Safety, Training & Quality Manager;
G. Health, Safety, Environment & Quality Superintendent;
H. Supervisor.

21.3.5. All records shall be made available to the client upon request or, if specified, submitted at the appropriate time.

### 21.4. REFERENCE

21.4.1. Exact Contracting's standard hazard/incident report on Lucidity.

## 22. ENVIRONMENTAL MANAGEMENT SYSTEM AUDITS

### 22.1. PURPOSE

22.1.1. To determine and provide guidance to management on whether the environmental management system is consistent with legislation and planning, and to seek assurance that it is appropriately and consistently implemented and maintained.

### 22.2. SCOPE

22.2.1. This section applies to all environmental aspects, programs, implementation procedures, reviews, reports and registers associated with the system and is used to determine how well it is being implemented and maintained. Please refer to the Exact Contracting Internal Environmental Management System Audit Tool available on Lucidity.

### 22.3. PROCEDURE

22.3.1. Establish and maintain a schedule for auditing the system and project sites annually.

22.3.2. The scope of the internal audit shall be established following engagement with senior management.

22.3.3. Auditing shall be completed by trained, independent and impartial auditors.

22.3.4. Audit criteria shall be developed through an analysis of ISO 14001:2015 systems requirements, legislation, and relevant statutory authorisations, and be represented as performance criteria and evidence required in the form of an audit tool.

22.3.5. Audit findings will take a non-conformance, observation, area of concern, opportunity for improvement approach and will be managed through the Lucidity audit function.

22.3.6. An internal audit report will be published annually.

### 22.4. REFERENCE

22.4.1. DCPRO-001 Document Control Procedure.

22.4.2. WHSPRO-012 Audit Procedure.

22.4.3. AS NZS ISO 19011:2014 Guidelines for auditing management systems.

## 23. EXACT CONTRACTING ENVIRONMENTAL MANAGEMENT REVIEW

### 23.1. PURPOSE

23.1.1. To ensure continual improvement and effectiveness of the Environmental Management System.

### 23.2. SCOPE

23.2.1. This section applies to the environmental management system in its entirety. Management shall review the policy and objectives. Programs and procedures identified within the system to ensure its overall effectiveness and suitability.

### 23.3. PROCEDURE

23.3.1. Management review of the system will be completed according to the following:

| Frequency | Project Management | Senior Management | Board |
|---|---|---|---|
| **Daily** | Pre-shift meeting – Environmental positives and challenges discussed and recorded on Daily Safety Report. Distributed to senior management for review and action where required. Hazards, incidents and opportunities for improvement are recorded in Lucidity. | Status meetings and discussion on environmental matters – General Manager - Operations and National Safety, Training and Quality Manager. | ✘ |
| **Weekly** | Project production meeting – Environment discussed as standard agenda item. Confirmation via meeting minutes. | ✘ | ✘ |
| **Monthly** | Monthly Environmental Focus – Delivered to site staff to generate environmental improvements. | Bi-Monthly Environmental Report – Company Monthly Environment Report distributed for comment and action.<br>Monthly Environmental Focus - Distributed to senior management to facilitate improvements where required.<br><br>Document control bulletin to all staff including senior management on all changes or new environmental documents added to Lucidity. | Bi-Monthly Environmental Report – Company Monthly Environment Report distributed for comment and action.<br>Monthly Environmental Focus - Distributed to senior management to facilitate improvements where required. |

| | | | |
|---|---|---|---|
| **Annual** | Internal Audit of environmental management system and Site Environmental Plans. Company Internal Environmental Audit Report distributed to Senior Management. Actions recorded in Lucidity. | Internal Audit of environmental management system and site environmental plans. Company Internal Environmental Audit Report distributed to Senior Management. Actions recorded in Lucidity.<br><br>Regimented Environmental Department site visitation schedule. Refer to EVNOBJ-001 for further detail. | ✘ |

***Table 5:*** *Environmental Management Review*

23.3.2. The review of the entire system (though not all elements need be reviewed at once) shall be completed and take into account:

A. Environmental performance;
B. Internal and external audit results and evaluations of compliance and requirements;
C. Communications from external interested parties, including complaints;
D. Extent to which objectives have been achieved;
E. Status of corrective and preventive actions;
F. Follow up actions from previous management reviews;
G. Suitability of environmental management system in relation to changing conditions/changing circumstances, including developments in legal and other requirements related to its environmental aspects;
H. Concerns amongst relevant interested parties;
I. Recommendations for improvement.

23.3.3. All observations, conclusions and recommendations shall be documented for necessary action.

## 24. SUBCONTRACTORS AND SUPPLIERS

### 24.1. PURPOSE

24.1.1. To ensure that products, materials and services purchased by Exact Contracting comply with Exact Contracting's environmental management system, requirements and contract requirements.

### 24.2. SCOPE

24.2.1. This section applies to all products, materials and services purchased by Exact Contracting which are to be incorporated into or employed on or which will in any way affect the environmental soundness of the work.

### 24.3. PROCEDURE

24.3.1. Prepare and maintain an approved list of acceptable subcontractors and suppliers.

24.3.2. Selection of an acceptable subcontractor or supplier shall depend on their ability to meet the necessary contract and environmental requirements.

24.3.3. In the absence of sufficient details on subcontractor/supplier history files, conduct sufficient inquiry of the subcontractor's or suppliers past performances and of their proposed product or service. Inquiry shall include:

A. Assessment of samples of products and/or materials;
B. Assessment of completed work;
C. Compliance through the 'Contractor Audit Checklist' (WHSFRM-066);
D. Review of references from other clients and /or contractors; and
E. Evaluation of their Environmental Management System.

24.3.4. Evaluate subcontractors and suppliers to determine the level of surveillance, inspection, testing and audit required.

24.3.5. Include details of external audits on subcontractors and suppliers in project audit programs.

24.3.6. Where required by the contract, provide the Client with relevant details of proposed subcontractors and/or suppliers.

24.3.7. Initiate purchases by raising a purchase order or a subcontractor agreement.

24.3.8. Purchase orders and subcontract agreements shall be signed by authorised signatories.

24.3.9. Ensure that purchase orders and subcontract agreements include all necessary details and information for the subcontractor or supplier to satisfactorily provide the product or service. Necessary details and information shall include (but not limited to) as applicable:

A. Materials and substance handling procedures;
B. Measurement and testing procedures;
C. Environmental impact minimisation procedures;
D. Technical data, drawings and specifications;
E. Pollution minimisation techniques;
F. Construction programs;
G. Reference to quotation;
H. Standards and tolerances to be met;
I. Client requirements;
J. Audit programs;
K. Requirement for access to facilities.

24.3.10. Establish and agree with the subcontractor/supplier procedures for:

A. Communication and especially for issue and receipt of instructions, variations etc.;
B. Recording results of inspections and tests (on standard inspection and test reports);
C. Providing access for Exact Contracting and for the client to facilities where any works affecting the quality of the final product are being carried out; and
D. Conducting audits.

24.3.11. Conduct monitoring and measurement of pollution indicators and of materials and/or products purchased from subcontractors and suppliers.

24.3.12. Identify, segregate, record and disposition non-conformance detected in materials, products or services of subcontractors and suppliers.

24.3.13. Conduct external audits on subcontractors and suppliers via Supplier Evaluation Matrix (PURFRM-007).

24.3.14. Following satisfactory receipt of purchased materials and products and the satisfactory completion of subcontracts, verify that all associated measurement and monitoring reports, checklists, corrective actions, etc. have been completed and signed off and that all necessary delivery dockets, certifications, instruction manuals, warranties, as-constructed drawings, etc. have been provided.

24.3.15. Endorse and forward copies of necessary documents to head office accounts for further processing and payment.

24.3.16. Establish and maintain records (standard subcontractor/supplier history files) which detail the performance of subcontractors and suppliers.

24.3.17. Subcontractor/supplier history files shall be kept via Lucidity Subcontractor function and Evolution purchasing application respectively. Exact Contracting shall be the basis for future assessment of subcontractors and suppliers.

24.3.18. Provide the client with access to all facilities where any works affecting the quality of the final product are being carried out by subcontractors or suppliers.

## 25. EP-01. AIR QUALITY AND EMISSIONS MANAGEMENT

| | |
|---|---|
| **PROGRAM** | Air Quality and Emissions Management |
| **OBJECTIVES REFERENCE** | Objective 1 – Environmental Compliance<br>Maintain and improve environmental compliance to enable the company to continually meet ISO 14001 environmental management systems certification requirements and Environmental Protection Authority Licence conditions.<br>Objective 5 – Sustainable Resource Management.<br>To reduce the impact on natural resources by selecting suppliers, contractors, machinery, equipment and appliances that are energy and water efficient, prevent pollution, prevent acceleration of climate change and integrate the principles of sustainable management where possible. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Operating facilities, machinery, vehicles and equipment that consume fuel and electricity. | ▪ Release of greenhouse gases ($CO_2$ equivalents) to atmosphere and contribution to global warming. |
| Using explosives in blasting. | ▪ Release of greenhouse gases ($CO_2$ equivalents) to atmosphere and contribution to global warming.<br>▪ Release of fumes and odours. |
| Producing general waste to landfill. | ▪ Decomposition of waste and release of greenhouse gases ($CO_2$ equivalents) to atmosphere. |
| Using paint for vehicle and machinery maintenance. | ▪ Release of greenhouse gases to atmosphere and contribution to global warming.<br>▪ Release of fumes and odours. |
| Operating vehicles and machinery on exposed surfaces. | ▪ Release of dust particulate to atmosphere (e.g. driving). |
| Operating machinery that produces particulates as part of processing. | ▪ Release of dust particulate to atmosphere, for example crushing, concrete batching or abrasive blasting. |
| Maintenance of plant and machinery. | ▪ Accidental release of refrigerant gases. |

| | |
|---|---|
| **RELEVANT DOCUMENTS** | ENVFRM-005_Monthly Environmental Inspection.<br>ENVPRO-006_Dust Management Procedure.<br>ENVPRO-005_Borrow Pit Management Procedure.<br>PLTPLN-001_Refrigerant Handling Risk Management Plan. |

| **STRATEGIES** | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Emissions management** | | | | |
| 1.1. | All fuel, energy, oil, grease, explosives and paint consumption will be recorded and reported as per National Greenhouse Energy Reporting requirements. | Company Operations.<br>Project Operations. | Project Managers.<br>Environmental Coordinators. | ▪ Fuel and energy consumption, oil, grease, explosives and paint consumption reported via Monthly environment report – Lucidity.<br>▪ Fuel, energy consumption and tonnes $CO_2$ equivalents reported to senior management monthly.<br>▪ Fuel, energy consumption and tonnes $CO_2$ equivalents reported to client where required.<br>▪ Fuel, energy consumption and tonnes $CO_2$ equivalents reported to Commonwealth as per regulatory requirements. |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 1.2. | Selective Catalytic Reduction (SCR) emissions reduction technology meeting Eu5 European Standard to reduce Nitrogen Oxide (NOx) and Diesel Particulate Matter (DPM) will be considered where the operating environment permits sustainable use. | Purchasing. | Plant Manager. | ✘ |
| 1.3. | All machinery, vehicles and equipment shall be serviced and maintained regularly to ensure optimal fuel efficiency. | Project Operations. | Project Manager.<br>Maintenance Managers. | ✘ |
| 1.4. | Haul roads, pits and ROM shall be designed to minimise congestion and associated waiting times. | Design and Development.<br>Project Operations. | Project Manager. | ✘ |
| 1.5. | New facilities will consider energy efficient appliances, lighting, heating and cooling. | Design and Development. | | ✘ |
| 1.6. | All waste will be separated into appropriate classes and will be disposed of at a licenced waste/recycling/landfill facility. | Project Operations.<br>Transport Operations. | Project Manager.<br>Transport Manager. | Waste recorded and reported in accordance with EPA waste tracking requirements. |
| 1.7. | Any form of waste shall not be burned under any circumstances. | Project Operations. | Project Manager.<br>HSE&T Coordinators. | ✘ |
| 1.8. | Asset life shall be extended by scheduled maintenance and refurbishment. | Company Operations. | Plant Manager. | ✘ |
| **Dust suppression** | | | | |
| 1.9. | Dust sources and levels shall be monitored daily and reported in accordance with client requirements. | Project Operations. | Project Manager. | Record of client reporting of dust observations. |
| 1.10. | Haul roads and operational areas shall be designed to limit the release of dust particulates. | Design and Development.<br>Project Operations. | Project Manager. | ✘ |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 1.11. | Bureau of Meteorology wind forecasts shall be monitored to implement the most effective controls. | Project Operations. | Project Manager. | ✘ |
| 1.12. | Haul roads and operational areas shall be watered to minimise airborne particulates. | Project Operations. | Project Manager. | ✘ |
| 1.13 | Vehicle and machinery haul road speeds shall be adjusted to the wind conditions. | Project Operations. | Project Manager.<br>HSE&T Coordinator. | ✘ |
| 1.14. | Clear and grub operations will be suspended during significant strong wind events. | Project Operations. | Project Manager. | ✘ |
| 1.15. | During crushing operations material shall be preconditioned and watered when stockpiled. | Project Operations. | Plant Manager. | ✘ |
| 1.16. | Drop heights will be monitored for excavator loading into dump trucks to prevent unacceptable dust drift. | Project Operations. | Project Manager. | ✘ |
| 1.17. | Topsoil and ore stockpiles will be managed according to client requirements to limit mobilisation of dust particulates. | Project Operations. | Project Manager. | ✘ |

## 26. EP-02. BIODIVERSITY AND HERITAGE MANAGEMENT

| PROGRAM | Biodiversity and Heritage Management |
|---|---|
| OBJECTIVES REFERENCE | Objective 6 – Biodiversity, Ecosystem and Cultural Heritage Management<br>To conserve and improve the quality of fauna, flora and ecosystems, and indigenous and cultural heritage by understanding permit conditions and site attributes. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Mobilising vehicles and machinery to site. | ▪ Outbreak of weeds and/or pathogens reduces habitat quality. |
| Driving and operating vehicles and machinery at mine site. | ▪ Death and injury to birds, mammals and lizards from collisions.<br>▪ Loss of vegetation condition from dust coating on leaves. |
| Clearing and grubbing vegetation. | ▪ Death and injury to birds, mammals, lizards and snakes from collisions.<br>▪ Damage to cultural heritage sites. |
| Stockpiling vegetation biomass and soil. | ▪ Seed bank in topsoil loses viability.<br>▪ Rehabilitation success compromised due to inadequate storage.<br>▪ Outbreak of weeds on stockpiles. |
| Removing overburden and ore. | ▪ Death and injury to birds, mammals and reptiles from collisions.<br>▪ Damage to cultural heritage sites. |
| Washing vehicles and machinery at wash-bay. | ▪ Loss of vegetation condition due to contaminated wash water.<br>▪ Reduce wildlife health due to contaminated wash water.<br>▪ Entrapment of wildlife in turkey nest. |
| Constructing roads and windrows. | ▪ Loss of vegetation condition due to changed drainage patterns. |
| Welding and grinding in the open. | ▪ Temporary loss of vegetation and wildlife due to bushfire.<br>▪ Increased exposure to plant and animal decline from erosion and weed incursion. |
| Producing and handling waste from mining operations. | ▪ Attraction of pest animals and snakes.<br>▪ Loss of flora and fauna health from leaching of contaminants. |
| Transporting, storing and using hydrocarbons and other hazardous materials. | ▪ Loss of fauna and flora condition due to hydrocarbon and hazardous material spills. |

| | |
|---|---|
| Watering roads with bore water for dust suppression. | ▪ Loss of flora and fauna condition due to increased salinity levels. |
| Recommissioning vehicles and machinery. | ▪ Disturbance to wildlife from noise associated with abrasive blasting.<br>▪ Contamination of land and water leads to flora and fauna health issues. |
| **RELEVANT DOCUMENTS** | ENVFRM-005_Monthly Environmental Inspection.<br>ENVFRM-007_Site Environmental Condition Survey.<br>ENVPRO-004_Vegetation and Topsoil Management Procedure.<br>WHSSOP-064_Welding Operations.<br>WHSFRM-038_Hot Work Permit.<br>WHSPRO-007_Hazardous Chemical Procedure.<br>WHSPRO-026_Spill Response Procedure.<br>WHSFRM-089_Spill Kit Inspection Form.<br>WHSSOP-082_Dust Suppression Procedure.<br>PLTFRM-003_Mobile Plant Mechanical Check Form.<br>PLTFRM-020_Asset Environmental Inspection.<br>ENVPRO-011_Environmental Hygiene Procedure.<br>CORFRM-036_Land Clearance Survey & Confirmation Form |

| **STRATEGIES** | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Flora (*native plant species and communities, pest plants and weeds*)** | | | | |
| 2.1. | Plant and equipment (exterior and interior) shall be clean and free from soil and vegetation prior to mobilisation and demobilisation. | ▪ Mobilisation.<br>▪ Demobilisation. | ▪ Plant Manager.<br>▪ Project Manager.<br>▪ Maintenance Manager. | ▪ Asset Environmental Inspection Form and Mobile Plant Mechanical Check Form. |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.2. | Project Managers and Environmental Coordinators will gain an understanding of the specific site requirements for the management of vegetation including:<br>▪ Vegetation Clearance, Ground Disturbance and Permit procedures.<br>▪ Species of conservation significance.<br>▪ Weed and Phytophthora (dieback) risks.<br>▪ Rehabilitation requirements. | ▪ Project acceptance.<br>▪ Initial engagement with Client Environmental staff prior to mobilisation. | ▪ Project Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 2.3. | Vegetation clearance footprint shall be completed as per contract requirements and the clearance design plans prepared by the client. | ▪ Project operations. | ▪ Project Manager. | ▪ Vegetation clearance total recorded in Lucidity Monthly Environmental Report. |
| 2.4. | A photographic reference will be established prior to clearance and photographic records maintained before, during and after clearing operations and rehabilitation. | ▪ Project operations.<br>▪ Before and after each clearance of individual allotments. | ▪ Project Manager. | ▪ Digital photographic record maintained in project file. |
| 2.5. | Vegetation clearance will adopt a staged approach to ensure minimisation of topsoil and dust movement. | ▪ Project operations. | ▪ Project Manager. | ✘ |
| 2.6. | Clearance boundaries will be clearly marked and understood by the Project Manager and operators through the use of machine control GPS and surveying/delineating the permitted area. | ▪ Project operations. | ▪ Project Manager.<br>▪ Operators. | ▪ Vegetation disturbance outside design specifications recorded as environmental incident – Lucidity. |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.7. | Clearance completed during peak rainfall months for the locality will ensure that sediments are not mobilised outside of the footprint by constructing diversion drains, bunds and silt traps. | ▪ Project operations Integrated into design in consultation with client.<br>▪ Before forecast significant rainfall. | ▪ Project Manager.<br>▪ Project Engineer. | ▪ Sediment control measures recorded on design plans. |
| 2.8. | Vegetation that is required to be protected due to the presence of plant species of conservation significance will be demarcated with fencing, flagging tape or bunting and be designated as No Go (Exclusion) Zones. Photographic record of these sites will be maintained and people, plant and equipment will be prevented from entry unless directed by the client. | ▪ Project operations. | ▪ Project Manager. | ▪ Vegetation protection measures recorded on design plans.<br>▪ Digital photographic record maintained in project file. |
| 2.9. | Trees may be felled towards the disturbed area to prevent impacts to uncleared vegetation. | ▪ Project operations. | ▪ Project Manager. | ✘ |
| 2.10. | Where there is a potential discovery of a plant species of conservation significance (as identified during client awareness), the client will be notified to allow for the collection of seeds for revegetation purposes. | ▪ Project operations. | ▪ Project Manager. | ▪ Vegetation protection measures recorded on design plans.<br>▪ Digital photographic record maintained in project file. |
| 2.11. | Clear and grub activities will be completed in accordance with local bushfire legislative requirements to minimise fire ignition and vegetation loss. | ▪ Project operations Fire Danger Season. | ▪ Project Manager. | ✘ |
| 2.12. | Vehicles and machinery will be parked within the clearance footprint area where safe and practical. | ▪ Project operations. | ▪ Project Manager. | ✘ |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.13. | Welding and grinding activities will be completed in accordance with Hot Works Procedure and Permit system or within a designated hot works area to prevent the ignition and/or loss of vegetation. | ▪ Project operations.<br>▪ Fire Danger Season. | ▪ Project Manager. | ✘ |
| 2.14. | Roads, bridge abutments and windrows will be constructed to divert water runoff to areas that will not impact on the quality of vegetation. | ▪ Project operations Integrated into design in consultation with client. | ▪ Project Manager.<br>▪ Project Engineer. | ▪ Sediment control measures recorded in design plans or the site specific Erosion & Sediment Control Plan. |
| 2.15. | Haul roads will be compacted and watered, and if necessary lower speed limits enforced to prevent smothering of vegetation with dust. | ▪ Project operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ✘ |
| 2.16. | Topsoil shall be stockpiled to a maximum height of two (2) metres (or as per client specification) to maintain the viability of the seed bank contained within the soil. | ▪ Project operations. | ▪ Project Manager. | ▪ Topsoil management activities recorded in Monthly Environmental Report – Lucidity. |
| 2.17. | Topsoil shall be stored outside of surveyed drainage lines to prevent mobilisation of soil and seed bank during rainfall events. | ▪ Project operations Integrated into design in consultation with client. | ▪ Project Manager. | ▪ Topsoil management activities recorded in Monthly Environmental Report – Lucidity.<br>▪ Sedimentation of waterways within work area recorded as environmental incident – Lucidity. |
| 2.18. | Vegetation biomass shall be retained and stockpiled for site rehabilitation in a manner that prevents damage from bushfire events. | ▪ Project operations Integrated into design in consultation with client. | ▪ Project Manager. | ✘ |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.19. | Weed outbreaks identified during operations shall be photographed, recorded and reported to the project client. | ▪ Project operations. | ▪ Project Manager. | ▪ Weed location and record of client report (time/date/person) recorded in project file. |
| 2.20. | Native plants that have regenerated in areas such as the workshop and administration shall be retained so long as they do not present any health or safety hazards. | ▪ Project operations. | ▪ Project Manager. | ✘ |
| 2.21. | Rehabilitation of site will be completed in accordance with client plans and specifications utilising materials from nominated stockpiles. | ▪ Project operations. | ▪ Project Manager.<br>▪ Project Engineer. | ▪ Rehabilitation activities recorded in Monthly Environmental Report – Lucidity. |
| 2.22. | Exact Contracting owned sites will ensure clearance is completed in accordance with the *Native Vegetation Act 1991* (SA) and the *Development Act 1993* (SA). Local indigenous plant species will be incorporated into re-vegetation or landscaping improvements at the site. | ▪ Design and development assessment. | ▪ Environmental Coordinators.<br>▪ Environmental Manager. | ▪ Environmental condition survey recorded – Lucidity.<br>▪ Plant species and numbers used in vegetation restoration recorded in project file. |
| **Fauna (*native wildlife and introduced animal species*)** | | | | |
| 2.23. | Native wildlife such as mammals, lizard, snakes and birds shall have right of way during clear and grub, earthmoving operations and on haul roads when it is safe to do so. | ▪ Project operations. | ▪ All Drivers/Operators. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.24. | All fatal and injured wildlife incidents shall be recorded and reported to the client. Deceased animals must be removed from roads and kangaroo pouches checked for joeys. Injured wildlife must be directed to the relevant onsite care facility to enable them to make a decision on rehabilitation and/or euthanasia as per animal welfare requirements. | ▪ Project operations. | ▪ Project Manager. | ▪ All fauna interactions reported as per client requirements and recorded as an environmental incident – Lucidity. |
| 2.25. | Sick and injured wildlife shall be reported to the client. | ▪ Project operations. | ▪ Project Manager. | ▪ All fauna interactions reported as per client requirements. |
| 2.26. | Personnel shall keep clear, avoid disturbance and prevent harm to wildlife that is in the vicinity of any operation or work activity. | ▪ Project operations. | ▪ All Staff. | ✘ |
| 2.27. | Personnel should be encouraged to know the native wildlife of the site, especially those of conservation significance, so that potential sightings can be reported to client environmental staff. | ▪ Induction.<br>▪ Training and Awareness.<br>▪ Project operations. | ▪ All Staff.<br>▪ Environmental Coordinators.<br>▪ Environmental Manager. | ▪ All potential and/or confirmed sightings of native wildlife of conservation significance to be reported as per client requirements. |
| 2.28. | In situations where bird-nesting burrows are discovered in soil or sand stockpiles, an assessment shall be made on the retention of that portion until fledglings leave the nest. The area of the stockpile to be retained will be marked with flagging tape and staff advised. | ▪ Project operations. | ▪ Project Manager.<br>▪ HSE&T Coordinators.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ▪ Nesting burrows to be reported as per client requirements.<br>▪ Locations to be recorded in project file. |
| 2.29. | Pipes ends shall be capped to prevent the entry of wildlife, where practical. | ▪ Project operations. | ▪ Project Manager. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.30. | Wildlife is only permitted to be captured, handled and released by persons trained and licenced for such activities. This includes wildlife that has become trapped in fencing or other structures. | ▪ Project operations. | ▪ All Staff. | ✘ |
| 2.31. | Consider the installation of wildlife egress ramps on lined water sources e.g. turkey nest or fencing where necessary. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Environmental Coordinators. | ✘ |
| 2.32. | Venomous snakes will only be permitted to be removed and released by the nominated, qualified personnel at a site. | ▪ Project operations. | ▪ Project Manager. | ✘ |
| 2.33. | No wildlife or companion animals such as dogs or cats are permitted on any site without prior consent from the client and/or relevant governing body. | ▪ Induction.<br>▪ Project operations. | ▪ All Staff. | ✘ |
| 2.34. | No native wildlife or pest animals such as dingoes, wild dogs, cats, foxes, etc. are to be encouraged to any site by direct hand feeding or deliberately making food available. | ▪ Project operations. | ▪ All Staff. | ✘ |
| 2.35. | Equipment damage from dingoes shall be prevented by storing equipment in vermin proof cases, lockers or within the confines of a lockable building. | ▪ Project operations. | ▪ Project Manager.<br>▪ Maintenance Manager. | ✘ |
| 2.36. | Materials and waste such as tyres shall be stored so that it reduces pooling and stagnation of water to prevent breeding of mosquitos. | ▪ Mobilisation.<br>▪ Project operations. | ▪ Project Manager.<br>▪ Maintenance Manager. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.37. | Pest animals that are retrieved from tailings dams or turkeys' nest, etc. shall not be released and shall be handed over to the client for management. | ▪ Project operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✖ |
| **Indigenous cultural heritage (*Aboriginal sites of significance, artefacts and burial sites*)** | | | | |
| 2.38. | Project Managers will gain an understanding of the specific site requirements for the management of Aboriginal Heritage including:<br>- Locations of surveyed and potential sites of significance<br>- Native Title claims<br>- Procedures for discovery of heritage artefacts | ▪ Project acceptance.<br>▪ Initial engagement with Client Environmental staff prior to mobilisation. | ▪ Project Manager. | ✖ |
| 2.39. | Personnel shall be aware of the indicators of Aboriginal Heritage and sites of significance through appropriate awareness training. | ▪ Induction.<br>▪ Training and Awareness.<br>▪ Project operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | ✖ |
| 2.40. | Upon discovery of Aboriginal archaeological artefacts, activities are to be suspended, Supervisor/Project Manager notified and an appropriately marked exclusion (No-go) zone established. | ▪ Project operations. | ▪ All Staff.<br>▪ Project Manager. | ▪ Disturbance recorded as an environmental incident – Lucidity.<br>▪ Artefact location and record of client report (time/date/person) recorded in project file. |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 2.41. | Upon discovery of potential Aboriginal human remains, activities are to be suspended, Supervisor/Project Manager notified and an appropriately marked exclusion (No-go) zone established. | ▪ Project operations. | ▪ All Staff.<br>▪ Project Manager. | ▪ Disturbance recorded as an environmental incident – Lucidity.<br>▪ Human remains location and record of client report (time/date/person) recorded in project file. |
| **European cultural heritage** | | | | |
| 2.42. | Project Managers will gain an understanding of the specific site requirements for the management of European Heritage including:<br>- Locations of surveyed and potential sites.<br>- Procedures for discovery of heritage artefacts. | ▪ Project acceptance.<br>▪ Initial engagement with client environmental staff prior to mobilisation. | ▪ Project Manager.<br>▪ Environmental Manager. | ✖ |
| 2.43. | Personnel shall be aware of the presence of European Heritage through appropriate awareness training. | ▪ Induction.<br>▪ Training and awareness.<br>▪ Project operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✖ |
| 2.44. | Upon discovery of potential European Heritage items, activities are to be suspended, Supervisor/Project Manager notified and an appropriately marked exclusion (No-go) zone established. | ▪ Project operations. | ▪ All Staff.<br>▪ Project Manager. | ▪ Disturbance recorded as an environmental incident – Lucidity.<br>▪ Artefact location and record of client report (time/date/person) recorded in project file. |

## 27. EP-03. NOISE, VIBRATION AND AMENITY MANAGEMENT

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| **PROGRAM** | Noise, Vibration and Amenity Management. |
| **OBJECTIVES REFERENCE** | Objective 1 – Environmental Compliance<br>Maintain and improve environmental compliance to enable the company to continually meet ISO 14001 environmental management systems certification requirements and Environmental Protection Authority Licence conditions.<br>Objective 6 – Biodiversity, Ecosystem and Heritage Management.<br>To conserve and improve the quality of fauna, flora and ecosystems, and indigenous and cultural heritage by understanding permit conditions and site attributes. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Drilling and blasting. | ▪ Disturbance of people and fauna from noise and vibration.<br>▪ Subsidence of landscape features. |
| Removing vegetation and topsoil for mine preparation. | ▪ Disturbance of people and fauna from noise. |
| Operating machinery and vehicles for production (extraction, crushing) and transport activities. | ▪ Disturbance of people and fauna from noise and vibration. |
| Operating machinery and equipment at facilities. | ▪ Disturbance of people and fauna. |
| Stockpiling of soil, ore and waste rock. | ▪ Adverse community perceptions due to visual appearance. |
| Storage of machinery, vehicles, equipment and consumables. | ▪ Adverse community perceptions due to visual appearance. |
| Illuminating operational areas for night works. | ▪ Disturbance of people and fauna from light spill. |

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| **RELEVENT DOCUMENTS** | ENVFRM-005 Monthly Environmental Inspection.<br>WHSPRO-002 Plant Procedure – Fixed and Mobile.<br>WHSPRO-024 Noise and Vibration Management Procedure.<br>WHSSOP-076 Guidelines for the Design and Construction of Mine Roads.<br>Site Specific Drill & Blast Management Plan.<br>WHSPOL-004 Contractor Management Policy.<br>WHSPRO-017 Contractor Management Procedure. |

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| | PLTFRM-020 Asset Environmental Inspection.<br>ENVPRO-011 Environmental Hygiene Procedure.<br>PLTFRM-003 Mobile Plant Mechanical Check. |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Blasting** | | | | |
| 3.1. | Blasting will be planned and implemented in accordance with regulatory and client requirements, together with the site Blast Management Plan. | ▪ Project Operations. | ▪ Project Manager. | ▪ Reporting, authorisation, and records management as per Blasting Procedure. |
| 3.2. | Assurance will be sought from the client that an appropriate community notification and complaints procedure is in place for blasting operations. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 3.3. | Blast will be recorded by digital video camera where possible. | ▪ Project Operations. | ▪ Shotfirer. | ▪ Video footage stored on project server. |
| 3.4. | Natural landforms will be monitored for evidence of subsidence. | ▪ Project Operations. | ▪ Project Manager. | ▪ Evidence of subsidence reported to client and recorded as environmental incident – Lucidity. |
| 3.5. | Air blast overpressure and vibration will be monitored in accordance with AS 2187.2: 2006 for projects in close proximity to residential and community facilities where required to be completed under the contract. | ▪ Project Operations. | ▪ Project Manager. | ▪ Blasting and vibration results maintained in project file. |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Design and operational control** | | | | |
| 3.6. | All machinery and equipment will comply with legislative and industry standards for noise emissions, including environment protection licencing requirements. | ▪ Project Operations. | ▪ Burton Plant Manager.<br>▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 3.7. | Sound limiting technology may be implemented when assessed to be feasible and effective in the context of a safe and economic operation, and where there is a clear community benefit. | ▪ Management of Change. | ▪ Burton Plant Manager.<br>▪ Project Manager.<br>▪ HSE&T Coordinator. | ✘ |
| 3.8. | Machinery and equipment shall be subject to audiometric testing and serviced and maintained to meet noise thresholds. | ▪ Project Operations.<br>▪ Management of Change. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinator.<br>▪ HSE&Q Superintendent. | ▪ Audiometric test results recorded in Plant Risk Assessment – Lucidity. |
| 3.9. | Noise barriers, buffers, enclosed areas and attenuation may be considered where an activity or use of equipment has the potential to exceed defined noise criteria or excessive light spill during night works. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ✘ |
| 3.10. | Operation of machinery and equipment shall consider appropriate timing and comply with relevant restrictions defined in environment protection legislation and policy. | ▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinator. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 3.11. | All noise monitoring equipment must be calibrated as per equipment manufacturer specifications. | ▪ Project Operations. | ▪ HSE&T Superintendent. | ▪ Calibration test results recorded in MEX and/or stored on Lucidity document register. |
| 3.12. | Haul roads and facilities shall be designed and maintained to minimise noise. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager. | ✘ |
| 3.13. | The use of heavy transport airbrakes in townships shall comply with the relevant regulatory requirements. | ▪ Transport Operations. | ▪ Transport Manager. | ✘ |
| **Aesthetics and amenity** | | | | |
| 3.14. | Site layout, entrances, buildings and signage shall be designed in accordance with local planning requirements and in a style that maintains an appropriate level of visual amenity. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinators. | ✘ |
| 3.15. | Site housekeeping shall be ordered with appropriate segregation of equipment and materials. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinators. | ▪ Inspected monthly and results recorded on Monthly Environmental Inspection Form. |
| 3.16. | Vehicles, machinery and equipment shall be regularly washed and be free of soil and dust during transportation. | ▪ Mobilisation.<br>▪ Project Operations.<br>▪ Demobilisation. | ▪ Burton Plant Manager.<br>▪ Project Manager.<br>▪ Maintenance Manager. | ▪ Environmental compliance recorded on PLTFRM-020 Asset Environmental Inspection Form or PLTFRM-003 Mobile Plant Mechanical Check Form. |
| 3.17. | Ore, topsoil and waste rock stockpiles shall be maintained in accordance with client requirements. | ▪ Project Operations. | ▪ Project Manager. | ▪ As per production reports, site plan and surveys. |

## 28. EP-04. SUSTAINABILITY

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| **PROGRAM** | Sustainability. |
| **OBJECTIVES REFERENCE** | Objective 3 – Waste Management<br>To reduce disposal to landfill through segregating waste materials so that it can be reused or recycled.<br>Objective 5 – Sustainable Resource Management.<br>To reduce the impact on natural resources by selecting suppliers, contractors, machinery, equipment and appliances that are energy and water efficient, prevent pollution, prevent acceleration of climate change and integrate the principles of sustainable management where possible. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Designing and re-engineering plant, equipment and facilities. | ▪ Increased energy and/or natural resource use.<br>▪ Increased emissions to atmosphere.<br>▪ Spills to land, drainage system or water. |
| Purchasing assets and consumables. | ▪ High energy, water and other consumable use for operations and maintenance.<br>▪ Increased waste production from packaging.<br>▪ Increased waste to landfill due to irrecoverable packaging or inability to refurbish/recycle equipment/machinery.<br>▪ Indirect environmental harm from embodied energy or land and water degradation from supplier chain.<br>▪ Decreased water quality from disposal of cleaning chemicals into effluent system. |
| Mobilisation and demobilisation of project sites. | ▪ Use of fossil fuels contributing to greenhouse gas emissions.<br>▪ Production of waste materials.<br>▪ Biosecurity threats from weeds, seeds, soil, and fauna present on or in vehicles, machinery, equipment and facilities. |
| Operations and maintenance of mining and civil activities. | ▪ Use of electricity, LPG, diesel, petrol, grease, oil, coolant, and water.<br>▪ Effluent production. |

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| | ▪ Production of waste materials.<br>▪ Distribution of weeds.<br>▪ Attraction of pest animals.<br>▪ Indirect greenhouse gas emissions from air travel. |
| Operation of Wayville and Burton facilities. | ▪ Use of electricity, LPG, diesel, petrol, grease, oil, coolant, and water.<br>▪ Effluent production.<br>▪ Production of waste materials.<br>▪ Distribution of weeds.<br>▪ Attraction of pest animals.<br>▪ Waste of resources for maintaining un-occupied or low-use space.<br>▪ Indirect greenhouse gas emissions from air travel.<br>▪ Increased ambient temperatures from structures due to urban heat island effect.<br>▪ Negative community perceptions. |
| Engaging subcontractors to perform work tasks. | ▪ Negative perceptions for supporting contractors who cause environmental harm or have had prior breaches of environmental legislation.<br>▪ Environmental incidents or breaches of environmental standards on/or involving Exact Contracting land and assets. |
| **RELEVANT DOCUMENTS** | ENVFRM-005_Monthly Environmental Inspection.<br>Online Waste Tracking Forms<br>PURFRM-001_New Supplier Form.<br>PURFRM-007_Supplier Evaluation Matrix.<br>ENVPRO-013_Waste and Recycling Procedure. |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Power use** | | | | |
| 4.1. | Exact Contracting owned sites will be landscaped to increase biodiversity and provide natural cooling from evapotranspiration:<br>▪ Local indigenous plants species and/or non-invasive species with low water requirements and drought tolerance.<br>▪ Low allergen plants.<br>▪ Plant beds to be covered with course mulch over weed mat to reduce water loss and prevent weeds.<br>▪ Natural rainfall from structures to be diverted to plantings where possible.<br>Landscape plant species selection will be coordinated through the Environment Department. | ▪ Design and Development. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 4.2. | Where possible, new refrigerators, freezers, clothes washers, clothes dryers, dishwashers, air conditioners and televisions are assessed to ensure they can economically achieve the highest Energy Star Rating as possible and are fit-for-purpose, considering the operating environment.<br>See: http://www.energyrating.gov.au/ | ▪ Purchasing.<br>▪ Company Operations. | ▪ Commercial & Finance Manager.<br>▪ Purchasing Officer.<br>▪ Purchasing & Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 4.3. | Where possible, buildings will be designed to maximise natural lighting with low use rooms are fitted with motion-sensors and/or wired to allow individual rooms to be switched-on when occupied. Low energy light globes will be used in buildings. Staff will be encouraged to switch off lights in unoccupied rooms. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 4.4. | Renewable energy options will be considered in the purchasing of power for operation of support services and Burton facilities. | ▪ Company Operations. | ▪ Commercial and Finance Manager. | ✘ |
| **Water use** | | | | |
| 4.5. | Where possible, new tap equipment, toilets, urinals, showers, dishwashers and washing machines are assessed to ensure that they can economically achieve the highest Australian Government Water Efficiency and Labelling (WELS) Star Rating as possible and are fit-for-purpose, considering the operating environment.<br>See: http://www.waterrating.gov.au/ | ▪ Company Operations. | ▪ Commercial and Finance Manager.<br>▪ Purchasing Officer.<br>▪ Purchasing and Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | ✘ |
| 4.6. | Opportunities will be considered to reduce mains water use at the Burton facility by incorporating rainwater harvesting and water storage (e.g., wash pad). | ▪ Company Operations. | ▪ Plant Manager. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Paper and printing** | | | | |
| 4.7. | Where possible, printing copy paper may be certified by Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC) in situations where there are no adverse cost pressures or supply difficulties:<br>▪ **Fuji Xerox Paper** (Performer+, Business+, Every day, Colotech+ ranges).<br>▪ **OfficeMax Paper** (OfficeMax Multipurpose Plus A4, OfficeMax Multipurpose Plus A3, OfficeMax 50% Recycled A4).<br>▪ **Winc. Paper** (100% Recycled Copy Paper A4, A3)<br>▪ **Reflex Recycled Paper** (100% Recycled FSC Certified A4).<br>See: https://www.pefc.org/ | ▪ Company Operations. | ▪ Commercial and Finance Manager.<br>▪ Purchasing Officer.<br>▪ Purchasing and Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | ✖ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 4.8. | Where possible, Exact Contracting publications and printing may be provided by Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC)certified printers using plant-based ink, elemental chlorine free paper that is either:<br>▪ **FSC 100%**: Products manufactured with 100 percent FSC-certified virgin fibre from FSC certified forests;<br>▪ **FSC Mix**: Products manufactured with a combination of FSC-certified virgin fibre (from FSC-certified forests), controlled sources and/or recycled wood or fibre;<br>▪ **FSC Recycled**: Products manufactured with 100 percent recycled fibre of which at least 85 percent is post-consumer (PCW) cycled material.<br>This will be considered in situations where there are no adverse cost pressures.<br>See: https://www.pefc.org/ | ▪ Company Operations. | ▪ Commercial and Finance Manager.<br>▪ Purchasing and Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | × |
| **Supply** | | | | |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 4.9. | Service providers, contractors and suppliers must demonstrate their commitment to environmental management and sustainability having established an environmental policy and a plan for minimising impacts on the environment. An assessment of the level of environmental management will be based on the size, services and activities that have the potential for impact. | ▪ Company Operations.<br>▪ Purchasing. | ▪ Commercial and Finance Manager.<br>▪ Purchasing Officer.<br>▪ Purchasing and Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | × |
| 4.10. | Service providers, contractors and suppliers must hold relevant EPA licences for the following activities:<br>▪ Abrasive blasting;<br>▪ Waste depots – landfill;<br>▪ Waste depots – liquid waste;<br>▪ Waste recycling;<br>▪ Battery recycling depot;<br>▪ Waste transport;<br>▪ Surface coating works – spray painting/powder coating. | ▪ Company Operations. | ▪ Commercial and Finance Manager.<br>▪ Purchasing Officer.<br>▪ Purchasing and Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | × |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 4.11. | Service providers and contractors shall be subject to an environmental conviction history check to assess any potential environmental liability exposure. | ▪ Company Operations. | ▪ Commercial and Finance Manager.<br>▪ Purchasing Officer.<br>▪ Purchasing and Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | × |
| 4.12. | Contract cleaners must demonstrate their commitment to low environment impact by achieving either of the following Australian and/or industry standards:<br>1. **Australian Standard AS4351** for Ready Biodegradability of the whole product<br>2. **GECA Standard 17-2007** for Cleaning Products (Australia)<br>3. **Green Seal Standard GS-34** for Cleaning and Degreasing Agents (USA)<br>4. **EcoLogo Standard CCD-146** for Hard Surface Cleaners (Canada)<br>5. **Standard EC-22-08** for General Purpose Cleaners (New Zealand)<br>6. **Standard EC-37-10** for Commercial and Institutional Cleaners (New Zealand) | ▪ Company Operations. | ▪ Commercial and Finance Manager.<br>▪ Purchasing and Supply Manager.<br>▪ Environmental Manager.<br>▪ Environmental Coordinator. | × |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Fuel use** | | | | |
| 4.13. | Transport drivers will be trained to maximise fuel efficiency through:<br>▪ Operational awareness so that braking is minimised;<br>▪ Keeping the truck moving wherever possible;<br>▪ Avoiding jerky patterns of acceleration and deceleration;<br>▪ Keeping the engine speed within the 'green band' and always using the highest possible gear;<br>▪ Changing gears as few times as possible;<br>▪ Avoiding unnecessary idling. | ▪ Transport Operations. | ▪ Burton Plant Manager.<br>▪ Transport and Tyre Manager. | ✘ |
| 4.14. | Transport and logistics planning shall be implemented to ensure efficient routing of equipment/supplies and back loading of materials. | ▪ Transport Operations. | ▪ Burton Plant Manager.<br>▪ Transport and Tyre Manager. | ✘ |
| **Waste** | | | | |
| 4.15. | Waste recycling station shall be provided in Head Office, Wayville:<br>▪ Paper and cardboard;<br>▪ General waste;<br>▪ Confidential paper disposal;<br>▪ Beverage containers (deposit). | ▪ Company Operations. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | ▪ Waste diverted form landfill recorded in monthly environmental report. |

## 29. EP-05. WASTE AND RECYCLING MANAGEMENT

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| **PROGRAM** | Waste and Recycling Management. |
| **OBJECTIVES REFERENCE** | Objective 1 – Environmental Compliance<br>Maintain and improve environmental compliance to enable the company to continually meet ISO 14001 environmental management systems certification requirements and Environmental Protection Authority Licence conditions.<br>Objective 3 – Waste Management<br>To reduce disposal to landfill through segregating waste materials so that it can be reused or recycled.<br>Objective 4 – Environmental Incident Prevention<br>To reduce environmental incidents through continually reviewing appropriate systems of work and operational controls. Including the prevention of hydrocarbon spillage by storing hydrocarbons as per regulatory and site requirements, identifying and controlling hazards, maintaining plant and machinery in a safe condition.<br>Objective 5 – Sustainable Resource Management<br>To reduce the impact on natural resources by selecting suppliers, contractors, machinery, equipment and appliances that are energy and water efficient, prevent pollution, prevent acceleration of climate change and integrate the principles of sustainable management where possible. Objective 6 – Biodiversity, Ecosystem and Cultural Heritage Management<br>To conserve and improve the quality of fauna, flora and ecosystems, and indigenous and cultural heritage by understanding permit conditions and site attributes. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Washing vehicles and machinery at wash-bay. | ▪ Collection of sediment contaminated with hydrocarbons, coolant, and hydraulic fluid.<br>▪ Reduce wildlife health due to contaminated wash water. |
| Producing, handling, storing and transporting waste from mining and civil operations. | ▪ Pollution of land and water from release of waste solids and liquids.<br>▪ Increased volume of waste to landfill.<br>▪ Missed opportunities for recovery.<br>▪ Attraction of pest animals to site.<br>▪ Breach of EPA waste transport licence conditions. |

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| Transporting, storing and using hydrocarbons and other hazardous materials. | ▪ Contamination of soil, surface and groundwater.<br>▪ Loss of fauna and flora condition due to hydrocarbon and hazardous material spills.<br>▪ Breach of EPA waste transport licence conditions. |
| Containing and cleaning hydrocarbon and hazardous chemical spills. | ▪ Accumulation of spill contaminated absorbents. |
| **RELEVANT DOCUMENTS** | ENVFRM-005_Monthly Environmental Inspection.<br>ENVFRM-007_Site Environmental Condition Survey.<br>ENVPRO-001_Controlled Waste Tracking and Transfer Procedure.<br>ENVPRO-013_Waste & Recycling Procedure.<br>Online Waste Tracking Forms.<br>WHSPRO-007_Hazardous Chemical Procedure.<br>WHSPRO-026_Spill Response Procedure.<br>WHSFRM-089_Spill Kit Inspection Form.<br>WHSPLN-006_Corporate Crisis Management Plan.<br>WHSPRO-001_Emergency Management Procedure. |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Waste** | | | | |
| 5.1. | Waste management will adopt a hierarchy approach:<br>**AVOID** waste production.<br>**REDUCE** waste production.<br>**REUSE** waste.<br>**RECYCLE** waste.<br>**RECOVER** part of waste.<br>**TREAT** to reduce contamination.<br>**DISPOSE** to environmental standards. | ▪ Company Operations. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 5.2. | Products that can be reused, recycled and recovered will be selected in favour of those that need to be treated and disposed, where practical. | ▪ Company Operations.<br>▪ Project Operations. | ▪ Purchasing and Supply Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager.<br>▪ Project Manager. | ✘ |
| 5.3. | All waste will be segregated and stored in adequately sign-posted designated bins, appropriate for the waste type within a bunded area. | ▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinators. | ✘ |
| 5.4. | Waste storage shall have adequate fire prevention and security measures and sited in locations outside of defined watercourses and flood prone areas. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 5.5. | All waste classes will be tracked from “cradle to grave”, with controlled waste recorded via the relevant State or Territory Waste Tracking process or in the absence of a process, the Exact Contracting Controlled Waste Transfer Docket. | ▪ Company Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager.<br>▪ Maintenance Manager.<br>▪ Transport and Tyre Manager. | ▪ Waste and recyclable materials recorded in monthly environmental report – Lucidity.<br>▪ EPA Waste Tracking Certificates retained in Environmental file for 5 years. |
| 5.6. | No controlled waste will be transported to, or collected by, the client/contractor without tracking the type and quantity of waste. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ✘ |
| 5.7. | Waste transport off site shall be authorised by the client (if required). | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 5.8. | Only licensed waste disposal and landfill facilities shall be used for the disposal of waste. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 5.9. | Waste transport will be completed in accordance with EPA Licence conditions for the transport of listed waste, solid waste and contaminated soil. | ▪ Company Operations. | ▪ Project Manager.<br>▪ Transport and Tyre Manager. | ✘ |
| 5.10. | Waste shall only be transported in appropriate bins and containers, which have been loaded to prevent the escape of material during transit. | ▪ Project Operations.<br>▪ Transport Operations. | ▪ Project Manager.<br>▪ Transport and Tyre Manager. | ✘ |
| 5.11. | Hydrocarbon contaminated soil or sediment will be disposed of at an onsite bioremediation area or a licensed waste facility. | ▪ Project Operations. | ▪ Project Manager. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 5.12. | Recycle bins shall be maintained for both administrative and mining/civil operations. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 5.13. | Sites and facilities shall maintain good housekeeping, being free from unrestrained rubbish at all times. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 5.14. | Staff will receive awareness training on the management of waste. | ▪ Project Operations. | ▪ Project Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 5.15. | Waste soil and sediment form the Burton wash bay will be transported to licenced landfill facility. | ▪ Transport Operations. | ▪ Plant Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ▪ Soil and sediment may be sampled in-house or by the licenced contractor and tested at NATA-approved laboratory for TPH, BTEX and PAH prior to transport to EPA approved landfill or removed by licensed contractor. |

## 30. EP-06. WATER MANAGEMENT

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| **PROGRAM** | Water Management |
| **OBJECTIVES REFERENCE** | Objective 4 – Environmental Incident Prevention<br>To reduce environmental incidents through continually reviewing appropriate systems of work and operational controls. Including the prevention of hydrocarbon spillage by storing hydrocarbons as per regulatory and site requirements, identifying and controlling hazards, maintaining plant and machinery in a safe condition.<br>Objective 5 – Sustainable Resource Management.<br>To reduce the impact on natural resources by selecting suppliers, contractors, machinery, equipment and appliances that are energy and water efficient, prevent pollution, prevent acceleration of climate change and integrate the principles of sustainable management where possible.<br>Objective 6 – Biodiversity, Ecosystem and Heritage Management.<br>To conserve and improve the quality of fauna, flora and ecosystems, and indigenous and cultural heritage by understanding permit conditions and site attributes. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Maintaining dust suppression for roads, extraction and crushing. | ▪ Increased use of surface and groundwater resources.<br>▪ Loss of vegetation due to high salinity levels in source water. |
| Washing vehicles and machinery at wash-bay. | ▪ Contamination of water from residual hydrocarbon, hydraulic fluid, and coolant.<br>▪ Contamination of water from bacteria and other pathogens.<br>▪ Increased use of surface and groundwater resource. |
| Constructing roads, bridge footings and windrows. | ▪ Loss of vegetation condition due to changed drainage patterns. |
| Stockpiling wood residue, mulch and soil. | ▪ Increased turbidity of surface water. |
| Transporting, storing and using hydrocarbons and other hazardous materials. | ▪ Contamination of surface and groundwater with environmental pollutants.<br>▪ Loss of fauna and flora condition due to hydrocarbon and hazardous material spills. |

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|---|---|
| Producing, handling and transporting waste from mining operations. | ▪ Loss of water quality from leaching of contaminants.<br>▪ Flooding of workshop and bunded areas.<br>▪ Spill of hydrocarbon or hazardous material during transportation.<br>▪ Spill of waste oil during transportation. |
| Storing water for production processes. | ▪ Contamination of water from bacteria and other pathogens. |
| **RELEVANT DOCUMENTS** | ENVFRM-005_Monthly Environmental Inspection.<br>ENVFRM-007_Site Environmental Condition Survey.<br>WHSPRO-007_Hazardous Chemicals Procedure.<br>WHSPRO-026_Spill Response Procedure.<br>WHSFRM-089_Spill Kit Inspection Form.<br>ENVPRO-004_Vegetation and Topsoil Management Procedure.<br>ENVPRO-006_Dust Management Procedure. |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Site design** | | | | |
| 6.1. | Topsoil and materials stockpiles shall be positioned outside of watercourses and include separation drains/basins to prevent erosion and mobilisation of sediment into surface water. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager. | ✘ |
| 6.2. | Detention basins, diversion drains, bunds and silt traps shall be incorporated into the site design to prevent uninterrupted flow of water over exposed surfaces, or into natural surface water features or pits. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager. | ✘ |
| 6.3. | Exposed surfaces shall be constructed to minimise pooling and divert water to stormwater system. | ▪ Design and Development. | ▪ Project Manager. | ✘ |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 6.4. | Access and hauls roads shall be constructed to intersect drainage lines at 90°. | ▪ Design and Development. | ▪ Project Manager. | ✘ |
| 6.5. | Waste tyres are not permitted to be used for the construction of bund walls or stored in locations where they can be mobilised during flooding events. | ▪ Design and Development. | ▪ Project Manager. | ✘ |
| 6.6. | Construction and maintenance activities such as concrete and shotcrete batching, and abrasive blasting shall be completed in designated bunded areas. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager. | ✘ |
| **Dust suppression** | | | | |
| 6.7. | Water use from all sources will be measured and recorded. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ▪ Potable and groundwater use to be recorded in Monthly Report – Lucidity. |
| 6.8. | Water cart spray systems will be designed and operated to prevent excessive drift. | ▪ Management of Change. | ▪ Project Manager.<br>▪ Maintenance Manager. | ✘ |
| 6.9. | Classes and types of water will be used under the direction of the client. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 6.10. | Haul roads will be designed and compacted to minimise the release of dust. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager. | ✘ |
| 6.11. | Haul road surface conditions will be inspected regularly during dust suppression activities to prevent overwatering. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| 6.12. | Foaming agent will be used in crushing operation as a water conservation measure where practical. | ▪ Project Operations. | ▪ Project Manager. | ✘ |
| **Wash Bay Operations** | | | | |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 6.13. | Wash-bay design will consider EPA Info for building & construction activities - Stormwater pollution prevention). | ▪ Design and Development. | ▪ Project Manager.<br>▪ Plant Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | × |
| 6.14. | All water shall be contained to the wash-bay through bunds, ramps, and collection sumps, tanks and/or dams to prevent discharge to land or stormwater systems. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager. | × |
| 6.15. | Water use from all sources will be measured and recorded. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinators. | ▪ Potable and groundwater use to be recorded in Monthly Report – Lucidity. |
| 6.16. | An appropriately maintained water and grease separator shall be fitted and operated for all washing activities. | ▪ Project Operations. | ▪ Project Manager. | × |
| 6.17. | Low environmental impact washing agents meeting Good Environmental Choice Australia Standard GECA 17-2007: cleaning products may be considered for washing vehicles and machinery. | ▪ Project Operations<br>▪ Purchasing. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ Purchasing Officer.<br>▪ Purchasing & Supply Manager. | × |
| 6.18. | All washing sediments from the pad and collection sump/tank shall be regularly removed and transported to an approved onsite bioremediation area or a licenced waste facility. | ▪ Project Operations. | ▪ Project Manager. | × |
| 6.19. | Water quality and sediment pollutants shall be maintained to applicable State, Commonwealth or International Standards. | ▪ Project Operations. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | × |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 6.20. | Water is reclaimed using appropriate water treatment technology and reused where possible. | ▪ Design and Development. | ▪ Plant Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | × |
| **Water Pollution Prevention** | | | | |
| 6.21. | All hazardous materials at site must be approved for use. | ▪ Project Operations.<br>▪ Management of Change. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | × |
| 6.22. | Hydrocarbon and hazardous materials handling and storage areas will be sited in locations outside of designated drainage, stormwater, watercourses and flood zones. | ▪ Design and Development. | ▪ Project Manager. | × |
| 6.23. | Hydrocarbons and hazardous materials (including controlled waste) will be stored in accordance with EPA guidelines and AS1940:2017 and 3780:2008 within a designated lined bunded area, bunded lube station or on a pallet bund. Bund capacity shall be 120% of the net capacity of largest tank and for flammable liquids 133% of the net capacity of largest tank. | ▪ Design and Development.<br>▪ Mobilisation.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinator. | × |
| 6.24. | Safety Data Sheets will be assessed for spill response absorbents, equipment and PPE. | ▪ Project Operations. | ▪ HSE&T Coordinator. | × |
| 6.25. | Spill response equipment shall be made available in an accessible and visible location where hydrocarbons and hazardous materials are handled, stored and transported. | ▪ Mobilisation.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | × |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 6.26. | All hydrocarbon and hazardous materials spills shall be controlled and remediated. Contaminated soil shall be disposed of at an onsite bioremediation area or licenced waste disposal facility. | ▪ Project Operations. | ▪ Project Manager. | ▪ Hydrocarbon and hazardous materials spills on site and during transport to be reported as environmental incident – Lucidity. |
| 6.27. | Drainage and stormwater systems shall be inspected and maintained to ensure the system is free of sediment and other debris. | ▪ Project Operations. | ▪ Project Manager. | × |
| 6.28. | Slopes and batters shall be compacted to reduce the incidence of scouring and erosion. | ▪ Project Operations. | ▪ Project Manager. | × |
| 6.29. | Bureau of Meteorology severe weather forecasts shall be monitored to assess potential flooding risks at the site. | ▪ Project Operations. | ▪ Project Manager. | × |
| 6.30. | Machinery, equipment and materials shall be relocated outside of flood zones | ▪ Project Operations. | ▪ Project Manager. | × |
| 6.31. | Drainage structures and erosion controls shall be inspected during rainfall and flooding events to ensure unacceptable levels of sediment are not being mobilised into surface water. | ▪ Project Operations. | ▪ Project Manager. | ▪ High turbidly/sedimentation and erosion to be reported as environmental incident – Lucidity. |
| **Pathogen prevention and control** | | | | |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 6.32. | Water units and storage tanks used in product processes, such as Shotcrete, shall be designed and maintained to prevent the access of dust, formation of biofilms and retention of water. | ▪ Design and Development.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Plant Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | × |
| 6.33. | Water unit decommissioning shall ensure that all pipes and basins are free from water and clear of debris for the period when the unit is not in operation. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | × |

## 31. EP-07. ENVIRONMENTAL INCIDENT PREVENTION, PREPAREDNESS AND RESPONSE

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| **PROGRAM** | Environmental Incident Prevention, Preparedness and Response. |
| **OBJECTIVES REFERENCE** | Objective 1 – Environmental Compliance<br>Maintain and improve environmental compliance to enable the company to continually meet ISO 14001 environmental management systems certification requirements and Environmental Protection Authority Licence conditions.<br>Objective 3 – Waste Management.<br>To reduce disposal to landfill through segregating waste materials so that it can be reused or recycled.<br>Objective 4 – Environmental Incident Prevention<br>To reduce environmental incidents through continually reviewing appropriate systems of work and operational controls. Including the prevention of hydrocarbon spillage by storing hydrocarbons as per regulatory and site requirements, identifying and controlling hazards, maintaining plant and machinery in a safe condition.<br>Objective 5 – Sustainable Resource Management.<br>To reduce the impact on natural resources by selecting suppliers, contractors, machinery, equipment and appliances that are energy and water efficient, prevent pollution, prevent acceleration of climate change and integrate the principles of sustainable management where possible.<br>Objective 6 – Biodiversity and Cultural Heritage Management.<br>To conserve and improve the quality of fauna, flora and ecosystems, and indigenous and cultural heritage by understanding permit conditions and site attributes. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Washing vehicles and machinery at wash-bay. | ▪ Collection of water contaminated with hydrocarbons, coolant and hydraulic fluid.<br>▪ Reduce wildlife health due to contaminated wash water. |
| Producing, handling, storing and transporting waste from project operations. | ▪ Pollution of land and water from release of waste solids and liquids.<br>▪ Breach of EPA waste transport and storage licence conditions. |

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| Transporting, storing and using hydrocarbons and other hazardous materials. | ▪ Contamination of soil, surface and groundwater.<br>▪ Loss of fauna and flora condition due to hydrocarbon and hazardous material spills.<br>▪ Breach of EPA waste transport or storage licence conditions. |
| Containing and cleaning hydrocarbon and hazardous chemical spills. | ▪ Accumulation of spill contaminated absorbents. |
| **RELEVANT DOCUMENTS** | ENVFRM-005_Monthly Environmental Inspection.<br>ENVFRM-007_Site Environmental Condition Survey.<br>ENVPRO-001_Controlled Waste Tracking and Transfer Procedure.<br>ENVPRO-013_Waste & Recycling Procedure.<br>Online Waste Tracking Forms<br>WHSPRO-007_Hazardous Chemical Procedure.<br>WHSPRO-026_Spill Response Procedure.<br>WHSFRM-089_Spill Kit Inspection Form.<br>WHSPLN-006_Corporate Crisis Management Plan.<br>WHSPRO-001_Emergency Management Procedure.<br>WHSFRM-092_Incident Notification Flowchart.<br>WHSFRM-102_Crisis Management Team Flowchart.<br>WHSFRM-058_Emergency Evacuation and Debrief Checklist.<br>CORFRM-036_Land Clearance Survey & Confirmation Form |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Fire Protection Management** | | | | |
| 7.1. | Fire protection planning will be integrated with the project risk assessment and the site emergency response plan. The fire risk assessment for the site will be completed as part of the project risk assessment and will take into consideration the following:<br>▪ All potential fuel sources;<br>▪ All potential ignition sources;<br>▪ All potential fire risk areas;<br>▪ Fuel properties;<br>▪ Risk to health and safety of people;<br>▪ Risk to property, production, and the environment;<br>▪ Required measures to control the fire risk;<br>▪ Information requirements to employees on the site;<br>▪ Instruction and training requirements;<br>▪ Environmental incident reporting and investigation requirements. | ▪ Mobilisation.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ✘ |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 7.2. | Fires will be prevented through the following onsite controls:<br>▪ Correct storage and handling of combustible materials;<br>▪ Plant maintenance practices and housekeeping;<br>▪ Training for maintenance and inspection of equipment;<br>▪ Operation and use of plant under designed loads and conditions;<br>▪ Use of tyres with correct TKPH ratings;<br>▪ Electrical protection and wiring to the applicable standards;<br>▪ Reducing the temperature of hot surfaces;<br>▪ Inspection regime;<br>▪ Segregation of fuel and ignition sources;<br>▪ Adequately maintained fire breaks around infrastructure and equipment enclosures, consistent with relevant authority guidelines;<br>▪ Limiting the quantity of potential fire fuels;<br>▪ Adequate ventilation;<br>▪ Hot works permit. | ▪ Mobilisation.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinator. | ✖ |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 7.3. | Frontline earthmoving equipment is fitted with the Sandvik FS1000 fire suppression system that meets AS 5062:2006 for the purpose of initial suppression of hydrocarbon fires and is customised to a range of equipment, which includes dump trucks, excavators and wheel loaders. | ▪ Mobilisation.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager. | ✘ |
| 7.4. | Appropriately rated and sized extinguishers should be provided with consideration to AS 2444:2001 and AS 1850: 2009, as required by the fire risk assessment and the intended fire risk area being protected. The fire extinguishers should be installed in safe locations, clearly identified and readily accessible. | ▪ Mobilisation.<br>▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinator. | ✘ |
| **Sensitive management of materials** | | | | |
| 7.5. | All hazardous materials must be approved for use at the site. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Maintenance Manager. | ✘ |
| 7.6. | All relevant staff will have knowledge in spill prevention and response though the basic environmental awareness training. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ▪ Environmental Training and Awareness attendance recorded – Lucidity. |
| 7.7. | Environmental incident response and notification will be included as an element of the site emergency response plan. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ✘ |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 7.8. | Emergency planning will take into consideration a review of all hazardous materials Safety Data Sheets (SDS) for the relevant spill response and environmental control measures. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | |
| 7.9. | Spill kits and other control mediums will be provided in visible and accessible locations consistent with the risks of the storage, handling and transport of the products and any associated waste material. | ▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager.<br>▪ HSE&T Coordinator. | ▪ Spill response kits inspected monthly in environmental inspection form and/or tamper tagged. |
| 7.10. | Spills will be reported as per company and client requirements. | ▪ Project Operations. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | ▪ Hydrocarbon spills 20 litres > reported as environmental incident – Lucidity.<br>▪ Spills 2 litres > reported in Lucidity spills register.<br>▪ Spills reported as per client reporting requirements. |

| STRATEGIES | | | | |
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| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 7.11. | Hydrocarbons and hazardous materials will be stored in accordance with AS 1940-2004 and AS 3780-2008 and any specific client requirements, which may include:<br>▪ Bunded area with impervious liner;<br>▪ Bunded lube station;<br>▪ Pallet bunds;<br>▪ Ventilated, bunded storage cabinets.<br>Bund capacity shall be 120% of the net capacity of the largest tank and for flammable liquids, 133% of the net capacity of largest tank. Materials storage shall be prohibited near watercourses or flood-prone areas. | ▪ Mobilisation.<br>▪ Project Operations. | ▪ Plant Manager.<br>▪ Project Manager.<br>▪ HSE&T Coordinator.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ▪ Inspected monthly and results recorded on Monthly Environmental Inspection Form.<br>▪ Non-conformance managed as a hazard – Lucidity. |
| 7.12. | Waste oil, hydraulic and other fluids will be collected in suitable containers for transfer to waste containers. | ▪ Project Operations. | ▪ Project Manager.<br>▪ Maintenance Manager. | ✘ |
| 7.13. | Abrasive blasting activities will ensure that garnet is recovered, and waste material is collected and disposed of at a licensed waste facility. | ▪ Project Operations. | ▪ Maintenance Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 7.14. | Abrasive blasting will be completed in a designated bunded area, hardstand or on tarpaulins to ensure garnet and waste is not released onto land or into watercourses or stormwater system. | ▪ Project Operations. | ▪ Maintenance Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 7.15. | Dangerous goods will be transported in accordance with relevant licencing conditions. | ▪ Transport Operations. | ▪ Transport Manager. | ✘ |

## 32. EP-08. LEGACY PROGRAM

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| **PROGRAM** | Legacy. |
| **OBJECTIVES REFERENCE** | Objective 1 – Environmental Compliance<br>Maintain and improve environmental compliance to enable the company to continually meet ISO 14001 environmental management systems certification requirements and Environmental Protection Authority Licence conditions.<br>Objective 6 – Biodiversity and Heritage Management<br>To conserve and improve the quality of fauna, flora and ecosystems, and indigenous and cultural heritage by understanding permit conditions and site attributes. |

| ENVIRONMENTAL ASPECTS | POTENTIAL IMPACTS |
|---|---|
| Mobilising vehicles and machinery to site. | ▪ Outbreak of weeds and/or pathogens reduces habitat quality. |
| Transporting, storing and using hydrocarbons and other hazardous materials. | ▪ Loss of fauna and flora condition due to hydrocarbon and hazardous material spills. |
| Drilling and blasting. | ▪ Subsidence of landscape features. |
| Producing, handling, storing and transporting waste from mining and civil operations. | ▪ Pollution of land and water from release of waste solids and liquids.<br>▪ Increased volume of waste to landfill. |
| Stockpiling of soil, ore and waste rock. | ▪ Adverse community perceptions due to visual appearance. |
| Washing vehicles and machinery at wash-bay. | ▪ Contamination of water from residual hydrocarbon, hydraulic fluid and coolant.<br>▪ Contamination of water from bacteria and other pathogens.<br>▪ Increased use of surface and groundwater resource. |
| General operations. | ▪ Unauthorised land disturbance. |

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| **RELEVANT DOCUMENTS** | ENVFRM-005_Monthly Environmental Inspection.<br>PLTFRM-020_Asset Environmental Inspection.<br>ENVPRO-011_Environmental Hygiene Procedure.<br>ENVFRM-007_Site Environmental Condition Survey. |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| **Tender phase** | | | | |
| 8.1. | Exact Contracting Environment Department will review tender documentation, provide feedback (whether there are any significant environmental aspects to consider) and submit relevant documentation. | ▪ Tender Review. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 8.2. | Health check on Principal Project approvals<br>Review of environmental compliance obligations. | ▪ Tender Review. | ▪ Business Development.<br>▪ General Counsel. | ✘ |
| **Upon contract award** | | | | |
| 8.3. | Health check on Principal Project approvals. | ▪ Contract Award. | ▪ Business Development.<br>▪ Project Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |
| 8.4. | All relevant client information including Environment Protection Authority licences and rehabilitation plan conditions will be sent to the Exact Contracting Environmental Department for review, together with the scope of works and contract conditions. | ▪ Mobilisation. | ▪ Business Development.<br>▪ Project Manager.<br>▪ Environmental Manager. | ✘ |
| 8.5. | Exact Contracting Environment Department to summarise significant environmental risks and provide recommendations to the Project Manager and Plant Manager in a timely manner to ensure relevant infrastructure can be mobilised. | ▪ Mobilisation. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | ✘ |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 8.6. | A site-specific Environmental Management Plan will be completed for contracts greater than 3 months in length. A site risk assessment will be initiated with the project manager and an evaluation of risks completed on completion of an onsite inspection and environmental survey. | ▪ Mobilisation. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | × |
| 8.7. | Initial informal stakeholder analysis is undertaken to identify any potential environmental, community or heritage risks. | ▪ Contract Award. | ▪ Project Manager.<br>▪ Environmental Coordinator.<br>▪ Environmental Manager. | × |
| 8.8. | The client environment department will be engaged to ensure relevant and appropriate application of site environmental policies, procedures and work instructions. | ▪ Mobilisation. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | × |
| 8.9. | Environmental Department shall complete land tenement analysis as per Land Tenement Analysis Procedure (ENVPRO-012). | ▪ Contract Award. | ▪ Environmental Coordinator. | × |
| **Site mobilisation and start-up** | | | | |
| 8.10. | Lube stations, hazardous materials cabinets, HDPE lined bunded area and/or pallet bunds are mobilised to site prior to the arrival of hydrocarbons and hazardous materials. | ▪ Mobilisation. | ▪ Plant Manager.<br>▪ Project Manager. | × |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 8.11. | Spill kits are consistent with the risk and arrive at the site with contents consistent with Exact Contracting spill kit standards. | ▪ Mobilisation. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | × |
| 8.12. | Waste and recycling bins and associated designated areas are established to receive waste and other material. | ▪ Mobilisation. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | × |
| 8.13. | Site waste tracking and required documentation is confirmed with client. | ▪ Mobilisation. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | × |
| 8.14. | Contracts are established with relevant suppliers for the collection of waste and recyclable materials. | ▪ Mobilisation. | ▪ Project Manager.<br>▪ HSE&T Coordinator. | × |
| 8.15. | On-site environmental risk assessment is completed within two weeks of mobilisation. | ▪ Mobilisation. | ▪ HSE&T Coordinator. | ▪ Environmental risk assessment recorded on Lucidity. |
| 8.16. | Site Environmental Condition Survey (ENVFRM-007) is completed during the start–up phase to benchmark environmental conditions prior to arrival. | ▪ Mobilisation. | ▪ Environmental Coordinator.<br>▪ Environmental Manager. | ▪ Site Environmental Condition Survey or condition report recorded on project drive. |
| **Project operations** | | | | |
| 8.17. | Monthly Inspections are completed for project sites to ensure compliance obligations are met. | ▪ Project Operations. | ▪ HSE&T Coordinator. | ▪ Environmental inspections recorded on Lucidity. |
| 8.18. | Monthly Environmental Reports are completed for project sites to account for training, incidents, land management activities, waste volumes, and energy and resource consumption. | ▪ Project Operations. | ▪ HSE&T Coordinator. | ▪ Monthly Environmental Report recorded on Lucidity. |

| STRATEGIES | | | | |
|---|---|---|---|---|
| **Item** | **How will we take action?** | **Triggers and timing** | **Responsible person** | **Reporting, monitoring and measurement** |
| 8.19. | Environmental incidents are investigated and recorded on Lucidity ensuring that contributing and corrective actions are completed. | ▪ Project Operations. | ▪ HSE&T Coordinator. | ▪ Environmental Incidents recorded on Lucidity. |
| **Demobilisation** | | | | |
| 8.20. | Site Environmental Condition Survey (ENVFRM-007) or full site closure condition reporting is completed at the conclusion of demobilisation to record site conditions upon exiting site. | ▪ Demobilisation. | ▪ HSE&T Coordinator. | ▪ Site Environmental Condition Survey or condition report recorded on project drive. |