

31 O'Connell Road  
CONSTRUCTION ENVIRONMENTAL  
MANAGEMENT PLAN

November 2023

Document History

Draft prepared 7 December 2023

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Rev 1 issue

Current issue

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## 1 Introduction

This Construction Environmental Management Plan (CEMP) details the environmental management and control measures which are to be implemented for construction activities associated with installation of stage 1a bulk earthworks development at 31 O'Connell Rd, Oberon to ensure the works are managed so as to reduce adverse impacts on the environment.

The CEMP specifies actions, responsibilities, conformance requirements and mitigation activities to be followed during the construction phase of the Project.

This CEMP is a live document and will be reviewed and updated where necessary to reflect changes introduced by the Project team, site specific outcomes, non-conformances and recommendations arising out of inspections, meetings and audits. Minor revisions will be endorsed by the Crossmuller Project Manager the CEMP is to be approved prior to the commencement of any earthworks or construction by the Consenting Authorities.

The construction of the Project is to be undertaken in a number of stages. These stages are generally not dependant on each other and may be undertaken in a different order However, the key construction activities are considered to be:

- Vegetation Stripping
- Topsoil stockpiling
- Cut and fill for sediment basin
- Cut and fill for playing fields, entry road , carpark , building platforms and future development areas
- Swales and batters

**Figure 1 Project Site Location**



## 2 Structure and Responsibilities

The Project delivery team, as per the list presented below, shall manage the Project.

During the construction period, all personnel including the Project Manager, Environmental Officer, Safety Officer, Site Supervisor, Work Assistants, and engaged Contractors have general responsibilities in the development of a positive environmental management culture and for ensuring all activities are conducted in a manner that is consistent with the CEMP. Specific project responsibilities in relation to environmental management are shown below.

### Crossmuller CEO

The Crossmuller CEO is responsible for:

- approving appointment of the Project Manager;
- periodic management review of the CEMP and its implementation; and
- investigating any serious incidents, complaints or non-conformances and ensuring necessary corrective action is implemented.

### Crossmuller Project Manager

The Crossmuller Project Manager reports to the Crossmuller CEO and is responsible for the day-to-day management of environmental performance on the project. The Project Manager is ultimately accountable for the implementation of the requirements contained within this CEMP. The Project Manager is responsible for:

- approving and implementing the CEMP;
- approving any revisions to the CEMP;
- instructing project personnel on how to comply with environmental policy and procedures;
- ensuring the Site Supervisor is aware of and complies with the environmental obligations as detailed within this CEMP;
- ensuring that employees, contractors and sub-contractors are aware of, and comply with, the conditions of consent and requirements of the CEMP relevant to their respective activities;
- tracking and compliance against the conditions of consent for the scope of works being performed;
- evaluation of how effectively environmental controls are performing;
- initiating remedial measures, as recommended by the Environment Officer, when environmental deficiencies are observed or in response to environmental complaints;
- engaging Crossmuller Environment Officer and/or environmental consultants where required to provide support in relation to implementing the CEMP; and
- investigating any incidents or complaints and ensuring necessary corrective action is implemented (in consultation with the CEO for significant incidents / complaints).

### Environment Officer

The Environment Officer will assist the Project Manager in meeting environmental performance targets for the project. The Environmental Officer is responsible for:

- preparing and updating the CEMP;
- assisting the Project Manager in implementing the CEMP;

- assisting in training project personnel on how to comply with environmental policy and procedures;
- undertaking, and/or arranging suitably trained personnel, for periodic monitoring and inspection;
- regular site inspections and the active pursuit of opportunities to enhance environmental outcomes;
- spot checks and general environmental compliance observations;
- tracking and reporting environmental performance;
- monthly evaluation of how effectively environmental controls are performing;
- recommending remedial measures when environmental deficiencies are observed or in response to environmental complaints;
- maintaining environmental performance records;
- investigating any incidents or complaints and ensuring necessary corrective action is implemented (in consultation with the Crossmuller CEO and Project Manager for significant incidents/complaints).

### Safety Officer

The Safety Officer will assist the Project Manager in meeting safety and environmental performance targets for the project. The Safety Officer is responsible for:

- advising on all issues related to work health and safety;
- inducting employees, contractors and sub-contractors to the Project;
- maintaining the SDS register;
- maintaining the hazardous substances register;

### Site Supervisor

The Site Supervisor will report to the Project Manager and is responsible for:

- Managing employees / contractors and construction activities on a daily basis to ensure the appropriate environmental controls are implemented and maintained in accordance with the requirements of the CEMP;
- Ensuring all staff are inducted into the site and undertake daily toolbox talks;
- Undertake daily site inspections of environmental controls and maintain records of environmental actions;
- Reporting any environmental management concerns or incidents immediately to the Project Manager;
- Recommending improvements to the CEMP to the Project Manager; and
- Implementing any corrective actions issued as a result of any site inspections, audits or meetings.

### Works Assistants and Contractors

The Work Assistants and Contractors will report to the Site Supervisor and are responsible for:

- Implementing the requirements of the CEMP as they conduct their works; and
- Reporting any environmental management concerns or incidents immediately to the Site Supervisor.

### 3 Site access

Access to the site during construction will be via Albion Street with a stabilised entry to the site. The approved Traffic Management Plan (TMP) should always be adhered to. Refer to TMP.

### 4 Hours of work

Hours of operation for the works on site will be in accordance with the Resource and Building Consent conditions.

- Monday to Friday 7am – 6pm
- Saturday 8am – 1pm
- No work on Sundays or public holidays

The exception to the above hours being that any emergency remedial works is required for example, general safety issues on the site or adjoining sites relative to the proposed earthworks or silt control installations, including repair after heavy rainfall, will not be subject to these restrictions.

### 5 Noise

There will be some noise generated from the earthworks. The adjoining properties near the subject site to the south are residential, so there may be some short-term impacts in terms of noise during works.

Construction and operational noise can represent an impact on the amenity of sensitive receivers such as dwellings and residents. The focus is on applying work practices most suited to minimising noise impacts. The aim is to protect the majority of residences and other sensitive land uses from noise pollution where practicable.

The nearest noise sensitive receptors are dwellings in Scotia Avenue, located adjacent and approximately 100 metres to the southern boundary of the proposed recreational sporting facility.

### 6 Dust

Toolbox meetings will be held to ensure all personnel on site are made aware that if they observe excessive dust in the air leaving the site, they are to immediately inform the Site Supervisor. In such cases, the Site Supervisor will investigate the source of the dust and ensure that proper controls are in place. If those controls prove ineffective that activity will cease until methods to successfully control the dust are employed.

The following measures will be implemented to manage dust generation from stockpiles of soil. Minimise the period and volume of stockpiling where practicable:

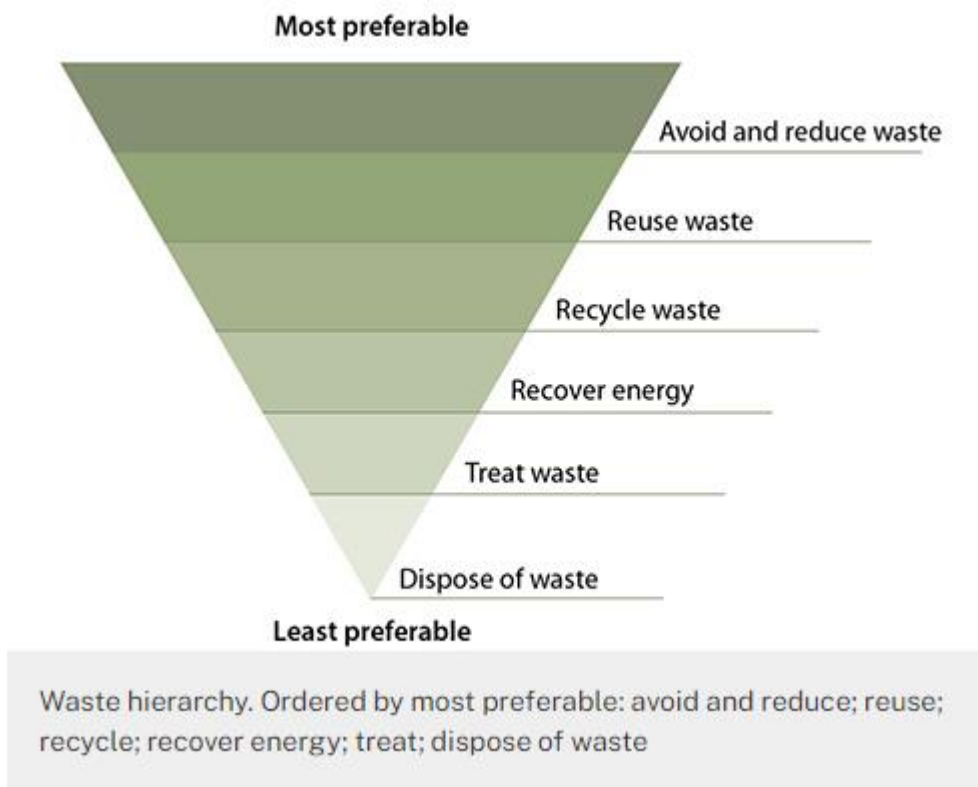
- Where any long-term stockpiling is required, stabilise the stockpiles; and
- Use of water sprays on any un-stabilised stockpiles.
- Evaluate prevailing weather conditions - excavation/fill works to cease or be modified if dust generation observed.
- Stabilise exposed areas as soon as practicable.
- Spray water on unsealed areas.
- Minimise the height from which dust-generating material is dropped.
- Minimise the surface area of a work zone.
- Construction plant and equipment are to be maintained and serviced regularly.

- Efficient use of plant and equipment, e.g., turning off idling plant and equipment.
- Covering of truck loads before leaving the site.
- Remove dirt and debris from the tyres and underside of trucks prior to leaving the site.
- Daily visual inspections by the Site Supervisor of the immediate surrounding area to ensure no materials have been lost from vehicles entering or leaving the site, and to assess general dust generation.
- Visual inspection of plant daily by the Site Supervisor for excessive exhaust emissions. Defective plant will be stood down until repaired. 14) Offensive odours are not expected to be generated from the site. If this does occur work involved is to stop temporarily, the source of odour investigated, and solutions.

## 7 Waste

Minimal waste is expected to be generated on site during construction particularly as no buildings or structures are to be demolished. Any waste that is generated during construction will be managed in accordance with the waste hierarchy established under the *Waste Avoidance and Resource Recovery Act 2001*, as shown in Figure 2.

**Figure 2 Waste Hierarchy**



The specific objectives of waste management for the project include:

- Reduce waste generation associated with the site construction activities;
- Where waste generation is unavoidable, promote reuse and recycling;
- Where on-site reuse or recycling is not practical, appropriate off-site recycling or disposal facilities should be employed, ensuring the responsible treatment of all waste streams; and
- Ensuring all waste disposal is undertaken lawfully.

Contingency procedures will also need to be in place to deal with any waste generated as a result of hazardous material spills.

Table 1 lists each type of waste expected to be generated during construction and the proposed reuse, recycling and disposal locations.

**Table 1 Waste type, disposal method and disposal locations**

Construction Activity	Waste type	Waste classification	Disposal method	Disposal location
Clearing and grubbing	General waste – vegetation	General solid waste (non-putrescible)	Reuse on-site as mulch bunds for erosion and sediment controls, landscaping and boosting topsoil organic matter	On-site
Excavation	Topsoil	General solid waste (non-putrescible)	Stockpiled and reused on site	On-site
	Subsoils- soils and clay material	General solid waste (non-putrescible)	Reused on-site for pond linings (clay), betterers or landscaping (soil)	On-site
General construction	General waste and recyclables – paper, glass, plastics, silt fences, aluminium cans, etc.	General solid waste (non-putrescible)	Recyclables placed in recycling bins and removed off-site to recycling facility (metals, glass, aluminium cans, plastics, batteries, paper products) General waste taken to licensed waste facility	Oberon Council Waste Depot
	Excess construction materials – asphalt, concrete, metal, steel, timber, temporary fencing, timber from formwork, guard rails etc.	General solid waste (non-putrescible)	Reuse on-site Re-processed (concrete, asphalt) for use as road base Re-processed urban wood residue to Borg Panels for particleboard production	On-site, Oberon Council Waste Depot or Borg Panels
	Packaging – pallets, crates, cartons, plastics	General solid waste (non-putrescible)	Return to material supplier Re-process urban wood residue to	Return to supplier, Oberon Council Waste



	and wrapping materials		Borg Panels for particleboard production	Depot or Borg Panels
	Empty container used for pesticides, herbicides, fuel, lubricants, paints and other hazardous chemicals	Hazardous waste	Stored in appropriate locked and bunded areas until disposal at a licensed waste facility Stell drums will be recycled where practical if a reliable drum recondition service is available Chemical drums that have been triple rinsed will be dispose of by drum-muster collection	Drum reconditioning service or Bathurst Council Waste Depot

Construction vehicles will be serviced at Borg Panels existing workshop and as such, materials associate with mechanical servicing and repairs will be managed and disposed of through their existing waste management system.

Portable toilets will be serviced by the hire company on an contractual basis.

## 8 Earthworks







Before earthworks commence, appropriate erosion and sediment controls will be put in place. This is likely to include silt fences, bunding and protection of the stormwater network and grid at entry and exit points to the site.

No earthworks under the approved Consent will be undertaken without implementation of these controls.

The proposed bulk earthworks entail the following:

- Construction of temporary sediment basins and installation of erosion and sediment controls
- Stripping vegetation, stockpiling topsoils for later use on playing fields
- Once stripping and stockpiling is complete the bulk excavation will start for the cut fills. A area of approximately 119,000m<sup>2</sup> will be cleared, filled, and levelled for the future building, playing fields, carpark, future development areas.

The average cut and fill depth is shown in the table below.

Elevations Table				
Number	Minimum Elevation	Maximum Elevation	Volume	Color
1	-8.800	-6.600	0m <sup>3</sup>	
2	-6.600	-4.400	407m <sup>3</sup>	
3	-4.400	-2.200	9965m <sup>3</sup>	
4	-2.200	0.000	48896m <sup>3</sup>	
5	0.000	2.200	50584m <sup>3</sup>	
6	2.200	4.400	701m <sup>3</sup>	
				Total Cut 61934m <sup>3</sup>
				Total Fill 51119m <sup>3</sup>

- Playing fields to subgrade
- Future development areas to subgrade

## 9 Deliverables

- Site Security, including fencing, site compound establishment.
- Removal of redundant infrastructure including farm fences, slabs, and rubbish
- Remediation works including establishment of stockpiles.
- Construction of temporary sediment basins and installation of erosion and sediment controls
- Vegetation / topsoil stripping and stockpiling
- Future Playing fields to Subgrade.
- Future Carpark and building areas to subgrade.
- Southern swale inlet to outlet

## 10 Environmental risk

Hazards identified in this CEMP are:

<b>Water and silt run off leaving the site and entering streets, curbs, and the stormwater network.</b>	
Controls	Establish and maintain erosion and sediment control devices on the site to minimise any discharge to the environment and stormwater network. This may include silt fences, bunding and vehicle washes.
<b>Dust</b>	
Controls	Water spraying to be used as required. Stock piling to be controlled and covered if necessary. Dry/sandy layers to be covered.

### Noise

Controls: Work to follow– Oberon Council Building Consent Conditions.

### Existing utilities

Controls: Site to have underground services located. Utilise Before you Dig service.

Hydro-excavation to be used if excavating close to underground services.

## 11 Erosion and sediment control plan

### CONSTRUCTION ENTRANCE & EXIT

A designated construction entrance and exit shall be installed for the site, any vehicle movement entering/exiting the site should be directed to use the aggregate pad. A Grid will be installed at the Entry/exit. Design and maintenance of the site entrance and exit shall be in accordance with the Oberon Council. See TMP.

### HEAVY RAINFALL CONTINGENCY MEASURES

If heavy rain is forecast or can be reasonable foreseen, measures shall be taken on site to reduce the potential for erosion or discharge of sediment laden water. These steps shall be especially prudent where the heavy rainfall event is due to be greater than the design event of the control devices.

- All earthworks' areas shall be compacted and surfaced roughened to the extent that is practicable considering slopes, stage of earthworks, equipment available and time prior to the occurrence of the rainfall event.
- All control devices shall be checked to ensure they will be operating effectively during the rainfall event. Additional bunding and silt fences may be required to reduce the loading on the permanent sediment controls.

### HEALTH AND SAFETY

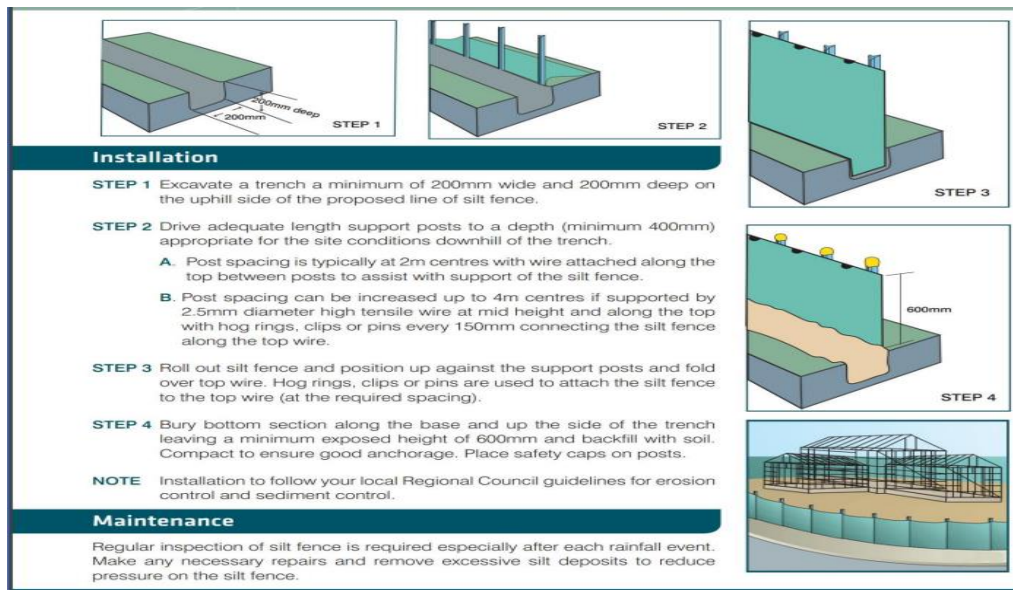
Crossmuller is focused on cultivating and implementing the Zero Harm philosophy throughout the workforce which will result in eliminating or reducing harm to the environment, workers or others affected by the works, and inspiring exceptional health and safety performance. This objective can be achieved if Crossmuller and its partners:

- Ensure that safety is a core value.
- Aspire to provide their people, contractors, stakeholders, and members of the public with the highest level of safety protection.
- Demonstrate visible safety leadership and inspire their people, contractors, and stakeholders to value exceptional health and safety performance.
- Lead an environment of trust and transparency.
- Promote safety innovation and recognise exceptional health and safety performance.
- Monitor, review and achieve continual improvement in health and safety performance.

Refer to Drawing below for soil and water management.

PROPOSED SPORTS COMPLEX BULK EARTHWORKS O'CONNELL ROAD OBERON NSW 2787	 170 RANKIN STREET, BATHURST, N.S.W. 2795 Tel: (02) 63323343 Fax: (02) 63318210	Job No. <b>2023.0913</b>	
SOIL & WATER MANAGEMENT PLAN		DWG. No.      Issue <b>ES01      C</b>	
CROSSMULLER		No. in set      13	

### SILT FENCE INSTALLATION



## SITE STABILISATION

No sediment control structure is to be removed from the site until the earthworks area has been stabilized appropriately.

## MAINTAINENCE & MONITORING

### Plan Reviews

There shall be fortnightly meetings between contract supervisor and Crossmuller to discuss works on site and management issues. If there is a conflict between works on site and the Plan, a review of the Plan shall be undertaken accordingly. If deemed necessary, a review of the plan shall be undertaken with consultation from all appropriate persons.

### Maintenance

All maintenance of the sediment control features to be employed on the site are to be in accordance with Oberon council. Specifically:

#### Silt Fences

Inspect fences at least once a week and before and after each rainfall event.

Make any necessary repair when bulges occur or when sediment accumulation reaches 20% up the fabric height. Remove sediment deposits as necessary to the stockpile.

Any areas of ineffectiveness need to be removed and replaced so that they are effective.

#### Stabilised Construction Entrance

Maintain the stabilised construction entrance in a condition to prevent sediment from leaving the construction site. After each rainfall inspect any structure used to trap sediment from the stabilised construction entrance and clean out, as necessary.

Where mud is tracked onto the public road it shall be cleaned at the end of each day.

Sumps shall be protected with appropriate erosion control devices to prevent silt from entering the stormwater system.

## 12 Change Management Plan

Change Management Plan includes the roles and names of people that can alter or change this document and the actions that must be followed to do so.

### Project Staff List

Role	Name	Email	Phone Number
Construction Manager	Daniel McDonald	<a href="mailto:McDonaldd@crossmuller.com.au">McDonaldd@crossmuller.com.au</a>	0405669922
Construction Coordinator	Levi Yates	<a href="mailto:Yatesl@crossmuller.com.au">Yatesl@crossmuller.com.au</a>	0488037441
Health and Safety Manager	David Ward	<a href="mailto:Wardd@crossmuller.com.au">Wardd@crossmuller.com.au</a>	0421109444
Contracts Administrator	Cooper Weeks	<a href="mailto:Weeksc@crossmuller.com.au">Weeksc@crossmuller.com.au</a>	0452276440
Civil Manager	Levi Yates	<a href="mailto:Yatesl@crossmuller.com.au">Yatesl@crossmuller.com.au</a>	0488037441
Human Resource Manager	Jason Fretwell	<a href="mailto:Fretwellj@crossmuller.com.au">Fretwellj@crossmuller.com.au</a>	0406380902

## 13 Resource Management Plan

### Equipment Register Plan

Plant/Equipment/Buildings	Purpose/task link	Internal or Externally Sourced
Cat 740D	Haulage of material on site	Internal
Komatsu D65PXi	Bulk earthworks and leveling	Internal
Komatsu D155Ax	Bulk earthworks	Internal
Cat730D	Haulage of material on site	Internal
Hamm Padfoot Roller	Compaction	Internal
Hamm Smooth Drum Roller	Compaction	Internal

Komatsu 30T	Bulk earthworks and leveling	Internal
Bobcat	Leveling	Internal
Komatsu 13T	Bulk and detailed Earthworks	Internal
Komatsu 5.5 T	Detailed Earthworks	Internal
Komatsu PC 210LCi	Bulk and Detailed Earthworks	Internal

## 14 Quality Management plan

### Strategies to Maintain Quality Control

#### Site Inspections

Site inspections will consist of group walk throughs with key manager individuals including the construction manager, construction coordinator and others if needed. Finishes and consistency to the standards will be investigated and controlled by these persons placing holds on completion markup if quality is not acceptable. Authority to approve completion creates barriers of prevention against poor workmanship and retains the quality assurance desired.

#### External Certification

External certification removes bias views on workmanship on key construction works allowing qualified/specialised professionals to determine the quality of work and creating another barrier of prevention. This will be both compulsory out of Crossmuller stipulation and with the stipulation of Crossmuller standards.

#### Internal Manufacturing Structural Steel

All structural steel is tested and documented with associated mill certs to assure the quality of the material is suitable and to Australian standards. These tests are documented and stored in a shared filing system OneDrive (P). Confirmation of assembly builds are signed by two individuals that work on the assembly and counts of material and project pieces are logged and filed accordingly in the (P) Drive shared location.

#### Toolbox Talks

Toolbox talks will be conducted daily by the Site Supervisor for employees and sub-contractors. Toolbox talks will be undertaken in response to evolving issues on the ground, particularly in response to significant environmental and safety incidents and non-conformance issues.

## 15 Compliance

### Environmental Audit Program

The CEMP implementation system will be audited internally to ensure effective compliance with environmental controls, reporting and incident management requirements.

The internal audits will occur within three months of commencement of construction activities on site and every twelve months minimum or as required thereafter. This activity will be planned, programmed and fully documented. The audits should be undertaken by the Borg Construction Environment Officer and include:

- A site visit;
- Review of monthly and other checklists;
- Compliance with the CEMP;
- Update on project status;
- Report on any on-site environmental incidents occurring since the last audit;
- Checks for any repeat issues; and
- Any new initiatives in environmental management.

Audit reports findings will be provided to the Project Manager for determining corrective action and reply. On a twelve monthly basis the Crossmuller Project Manager shall undertake a management review of the CEMP.

#### Environmental Monitoring

Monitoring that is required during the construction phase of the Project. Any measuring equipment used for monitoring shall be regularly serviced and calibrated.

#### Environmental Inspections

In addition to formal auditing and monitoring identified in this CEMP, the following inspections will also be undertaken:

- On a daily basis, site supervisory staff will inspect the Site and any issues arising will be noted in the daily diaries and communicated to the Project Manager. The inspections will be conducted visually prior to commencement of each day's work and where appropriate during the working day. A final daily inspection will also be undertaken at the end of the workday to ensure that systems and structures are in place. Checklists may be edited to reflect changing site conditions.
- A monthly site inspection will be conducted by the Environment Officer. Checklists will be used to record and report on activities for compliance with this CEMP and specific issues presenting significant environmental risks will be addressed, such as noisy works, sediment basin management, etc. Checklists may be edited to reflect changing site conditions.

Where necessary, any damage or reduced capacity of environmental control measures will be corrected. If required, environmental control measures may be upgraded.

## 16 Incident Management and Complaints

#### Environmental Incidents

An environmental incident is an unplanned event which occurs on-site and has the potential to result in adverse environmental impacts either on-site or in the surrounding area. Environmental incidents include spills, uncontrolled discharges or emissions, unintended damage to native vegetation, or injury to wildlife.

Depending on the nature of the incident and the risk posed to site personnel, all practical steps will be taken to minimise the risk of environmental damage as soon as possible after the event.

In the case of an environmental incident, actions to be taken are:

- Notify the Site Supervisor immediately;
- Immediately cease work in that area and remove people from the incident zone;
- Activate the site Pollution Incident Response Management Plan (PIRMP) if appropriate;
- Notify emergency services as/if required;
- Where safe to do so, attempt to contain the hazard and prevent it from spreading;

- If the incident is a spill:
  - Use silt fences, bunding or interception pits;
  - Use absorbent materials stored on site to clean up spill;
  - Contain contaminated soil/absorbent material waste in appropriate containers, and dispose of contaminated soil/absorbent material to an appropriately licensed off-site disposal facility;
- Notify any relevant agencies when an incident causes or threatens material harm to the environment and /or an exceedance or limit of the performance criteria in the approval and /or when legislation requires;
- The Site Supervisor is to notify the Environment Officer and Project Manager of any environmental incident as soon as practicable;
- Temporarily repair or isolate the failed plant or equipment component;
- Determine actions to rectify the incident in consultation with the Environment Officer;
- Sample the impacted site media be it soil and/or surface water; and
- Implement any longer term remedial measures that may be required.

The Environment Officer will be responsible for notifying NSW EPA of the pollution incident. Information to be provided under section 150 of the POEO Act includes:

- Time, date, nature, duration and location of the incident;
- Location of the place where pollution is occurring or is likely to occur;
- Nature, the estimated quantity or volume and concentration of any pollutants involved;
- Circumstances in which the incident occurred (including the cause of the incident, if known); and
- Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution.

The Environment Officer is to collect and document (to the extent practicable) the above information. For example, this would include taking photographs, collecting surface water samples of any unplanned water discharges both from the source of the pollution and upstream and downstream in the receiving waterway (for analysis and comparison).

Any environmental incidents, spills, uncontrolled discharges or emissions, unintended damage to native vegetation, etc , and the corrective actions undertaken, shall be recorded in DataStation, Borgs incident management system.

## 17 Emergency Contacts

Emergency contact details are listed in the Borg Panel – Oberon Emergency Response Plan, which includes the Pollution Incident Response Management Plan (PIRMP).

## 18 Complaints Handling

The Environment Officer is to be notified of any received complaints. The Environment Officer is to follow the Borg complaints handling procedure and notify the Project Manager as soon as practicable. The Project Manager will notify the Borg Managing Director, as appropriate.



### **Inquiry and Complaints Handling Process**

Borg's community and stakeholder management system includes procedures for recording, investigating, tracking and handling of all inquiries and complaints. Once Borg has received verbal or written inquiries and/or complaints via telephone, email or post, the Environment Officer or their nominated delegate will:

- undertake an immediate investigation into the nature/cause of the inquiry and/or complaint;
- make initial contact with the community or stakeholder representative within 48 hours to clarify the reason for the inquiry and/or complaint and to notify of the investigation process including an appropriate re-notification time;
- record the enquiry and/or complaint on the Community Complaints register. This register includes the following details:
  - Complaint date and time;
  - Site;
  - Title;
  - Category;
  - Description;
  - Caller details;
  - Action;
  - Status;
  - Follow-up;
  - Complaint validity; and
  - Attachments.
- further investigate the inquiry and/or complaint and provide the community or stakeholder representative with an explanation of the cause and details of any actions taken to mitigate its effect.

It should be noted that if the inquiry and/or complaint is classified as an incident of significance under the site Emergency Response Plan (ERP), the Environment Officer must follow the incident reporting process in that document and ensure appropriate resolution and sign-off.

Records of complaints will be maintained in the complaints register database for at least four years after the complaint was made.

## 19 Non-Conformance

### **Non-Conformance and Corrective Action Report**

All non-conformances noted in the Site Inspections, Audits, Incident Reports, or reported to the Project Manager by staff or other parties/authorities will be investigated and recorded in a Non-Conformance and Corrective Action Report which will be provided to the Project Manager on a monthly basis. Details of the non-conformance, including any immediate corrective actions undertaken, are to be recorded by the Environment Officer.

It is the responsibility of the Site Supervisor to immediately initiate corrective actions, if required. The Non-Conformance and Corrective Action Report must include details of the corrective action proposed and an appropriate close out date. Corrective Actions will include containment measures, clean-up and restoration of the affected area and of any deficient operational controls or monitoring controls. On completion, the Environment Officer will re-inspect the outcomes to ensure that they are acceptable before signing, dating and filing the Non-conformance Report.

The occurrence of such an event will be brought to the attention of personnel responsible, and environmental controls will be updated to prevent a reoccurrence.

#### Environmental Incidents Register

Environmental incidents are recorded in DataStation, Borgs incident management system. Each incident report will detail the issue, the corrective and preventative actions proposed, and the responsibilities and timing for completion of the actions. The report will include any comments and the completion date of corrective actions.

The Environment Officer shall review the Environmental Incidents Register monthly to ensure actions are completed and that controls are performing effectively. The Environment Officer shall also review the CEMP to determine if the above situations require project scope changes or if the incident identifies opportunities for improvement in mitigations or work practices.