



Environmental Management Plan

Protection of the Environment Operations Act 1997

Project: 2 Doran Drive Castle Hill NSW

(Showground Station Site)

Deicorp Pty Ltd ABN 55 138 180 337



REVISION HISTORY

REVISION	REVISION DETAIL	DATE
0	INITIAL RELEASE	28/02/2023
1	Project Personnel	01/06/23
2	Project Personnel	19/06/23
3	Project Personnel	30/11/23
4	Project Personnel	20/12/23
5	Project Personnel	09/02/24

CREATED BY: JASON FARRUGIA	REVIEWED BY: MITCH CORREIA	APPROVED BY ANDREW COLEMAN
--------------------------------------	--------------------------------------	--------------------------------------



TABLE OF CONTENTS

1	Background.....	6
1.1	<i>Purpose and Scope</i>	6
1.2	<i>Project Details</i>	6
1.3	<i>Description of Works</i>	8
1.4	<i>Project Environmental Policy</i>	8
2	Environmental Management and Responsibilities	10
2.1	<i>Project Organisation Chart</i>	10
2.2	<i>Project Manager</i>	11
2.3	<i>Site WHS Coordinator / Group WHS Manager</i>	11
2.4	<i>Site Foreman</i>	12
2.5	<i>Subcontractors</i>	13
2.6	<i>Approving Authority</i>	13
2.6.1	<i>Condition of Approval Reference Table</i>	14
3	Implementation	15
3.1	<i>Risk Management Process</i>	15
3.2	<i>Site Specific Environmental Aspects and Controls</i>	17
3.3	<i>Groundwater</i>	19
3.4	<i>Waste Disposal</i>	20
3.5	<i>Consultation</i>	22
3.6	<i>Community Complaints</i>	22
3.7	<i>Site Environmental Emergency Management</i>	23
4	Inspection and Monitoring.....	23
4.1	<i>Corrective Actions</i>	24
4.2	<i>EMP Review</i>	25
4.3	<i>Performance Indicators</i>	26
	Appendix A – Site Layout Plan	27
	Appendix B – Plant Register	28



Definitions and Acronyms

Absorbent - a material which absorbs a liquid or chemical.

Aspect - the potential to cause impact to the environment.

Beneficial Use - a use of the environment or any element or segment of the environment which is conducive to public benefit, welfare, safety, or aesthetic enjoyment and which requires protection from the effects of waste discharges, emissions, or deposits or of the emission of noise.

Conditions of Approval – Obligations that may be imposed the activity which are assessed under Part 5 of the Environmental Planning and Assessment Act 1979.

Conditions of Consent – Obligations imposed on the proposed development which are assessed under Part 4 of the Environmental Planning and Assessment Act 1979.

Contaminated Soil - soils with contaminant/elutriation concentrations which are greater than the criteria set out in the regulation.

Environment – the surroundings and conditions in which an organisation operates, including living systems (human and other) therein.

Environmental Aspect – An element of Deicorp activities, products or services that may potentially interact with the environment.

Environmental Impact – any direct or indirect impingement of the activities, products, and services of the organisation upon the environment, whether adverse or beneficial.

Environmental Management – those aspects of the overall management function (including planning) that develop, implement, and maintain the Environmental Policy.

Environmental Management Plan – A site or project specific plan developed to ensure that appropriate environmental management practices are followed during the construction and/or the operation of a project.

Environmental Management System – The components of the overall Integrated Management System (IMS) that includes the organisational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the environmental policy.

Erosion - process that results in the removal and downstream deposition of soil.

Groundwater - any water contained in or occurring in a geological structure or formation or an artificial landfill.

Minister - Minister administering the environmental planning and assessment act 1979.

Paint Sludge - the settleable matter in paint wash water.

Prescribed Industrial Waste – has the potential to adversely impact human health and the environment. The waste may be from an industrial origin, arise from trade and commercial activity, or be contaminated soils as listed in the Regulation.

Proponent - an applicant for a development application under part four of the Environmental Planning and Assessment Act 1979 (the Act) and a proponent for an activity under part 5 of the Act.

Stormwater - water which originates from rainfall events.

Sediment - particles which settle out from a water column.



Trade Waste - waste generated from any trade business or undertaking which results in the discharge of waste to sewer.

WHS – Work Health and Safety

WHSE – Work Health, Safety and Environment



1 Background

1.1 Purpose and Scope

The purpose of this Site Environmental Management Plan is to provide guidelines and direction to all Deicorp employees, subcontractors, and visitors via effective implementation of the works required to be carried out as per contract and specification with minimum impact on the environment.

This Plan is written in accordance with ISO14001 Standard addressing the safety requirements on construction sites.

The scope of this Plan is for the principal contractor or contractor component of works associated with the project.

1.2 Project Details

Deicorp Pty Ltd has been engaged to procure and manage the following:

Project Name	Showground Site
Site Address	2 Doran Drive Castlehill NSW 2154
Site Contact Email	lfitzgerald@deicorp.com.au
Site Representative & Contact Details	Luke Fitzgerald 0477 999 575
Scope of Works or service to be provided	Construction of 450 residential units, 4 towers , 10,000 sqm retail/commercial and 5 basement carparking levels in accordance with development consent ref: SSD 15882721
Proposed Completion Date	January 2025
Client – Address & Contact Details	Deicorp Projects (Showground) P/L Ph: 8665 4100
Client Representative	Andrew Coleman – Construction & Development Executive Ph: 8665 4100



1.2.1 Stakeholders

Stakeholders Interests					
Internal	Area of Interest	Connected	Area of Interest	External	Area of Interest
Directors	<ul style="list-style-type: none"> Profitability Strategic direction Business growth & continuity Quality services & client satisfaction Safety of staff and general public Environmental and social impacts Professionalism Staff retention Work / life balance Branding 	Customers, past purchasers, retail & other tenants, 3 rd party clients, strata committees/ owner corporations	<ul style="list-style-type: none"> Deicorp reputation Project profile, location Price / value for money Compliance to standards and legislation, Quality work Safety in design Environmental performance, impacts 	Government agencies including ATO, Workcover, ASIC, Government Authorities, Service Utilities, Hills Shire Council, Landcom, Sydney Metro & Hills Shire Community Group	<ul style="list-style-type: none"> Payment of taxes and duties Transparency Compliance with legislation and by-laws Employment Innovation Environmental impacts and public safety
Employees	<ul style="list-style-type: none"> Remuneration Work / life balance Professional development Branding Employer loyalty 	Suppliers, sub-contractors / Alliances / Sales Agents, Consultants, Housing partners	<ul style="list-style-type: none"> Risk management & project overrun Project scope Timely payments Business growth Supplier loyalty Compliance to standards Site safety 	Community Groups including Hills Shire Community Group	<ul style="list-style-type: none"> Sponsorships Environmental aspects and impacts Economic impact Public safety Cultural heritage
Shareholders, investors	<ul style="list-style-type: none"> Profitability Strategic direction Business growth & continuity Stability Sound management 				

1.3 Description of Works

1.3.1 Specific activities

Works will be undertaken in accordance with development consent ref: SSD 15882721

The project includes 2-4 levels retail & commercial with 4 x residential multi-unit residential towers constructed above and associated 6 x basement carparking levels and outdoor public domain landscaping works.

Location of works

See Site Map in Appendix A.

1.3.2 Plant on site

Refer to Appendix B - Plant Register.

1.4 Project Environmental Policy

Policy Statement

Deicorp is committed to the prevention of pollution and protection of the environment. Where possible, our designs should specify materials that are energy efficient with minimal environmental impact taking into account life span criteria and operational requirements. We are committed to minimising the environmental impacts associated with office activities and the compliance with ISO 14001:2015 Environmental Management.

Strategies include:

- Complying with legislative and regulatory requirements at the very minimum;
- Identifying all potential environmental aspects and impacts associated with our business activities and putting in place mitigation measures to remove (where possible) or reduce the level of impact;
- Implementing processes to reduce the overuse of resources (paper and plastic), minimise waste printing only when necessary and using friendly environment cups and reduce greenhouse emissions across our business.
- Conducting internal audits and participating in external audits to determine environmental compliance, and where inadequacies are identified, implementing corrective action;
- Continually improving the environmental aspect of the Integrated Management System;
- Exercising the principles of 'Ecologically Sustainable Development' as detailed in relevant environmental legislation;
- Establishing, monitoring, and reviewing measurable environmental targets, and adapting them as required to ensure effectiveness.
- Liaising with the communities in which we operate to identify and acknowledge their environmental-related needs and concerns.



- Engaging subcontractors and suppliers based on their ability to meet environmental requirements;
- Utilising materials that are environmentally friendly, recycled or reused where possible;

The success of our health & safety management is dependent on:

1. The pro-active identification of environmental aspects and impacts for work related activities via a Risk Assessment and the adoption of Safe Work Method Statements to control risks that cannot be eliminated.
2. Educating employees in environmental legislative and regulatory requirements, the benefits of environmental preservation, and the potential costs of poor environmental controls on a project to both the Deicorp and the community;
3. Ensuring the project team is totally committed to achieving our Environmental Objectives.
4. Ensuring that open and honest communication exists between management and all stakeholders.

This Environmental Policy will be reviewed each year in consultation with relevant stakeholders and revised as necessary to keep up to date with new legislation and the organisation changes.

1.4.1 Project Objectives and Targets

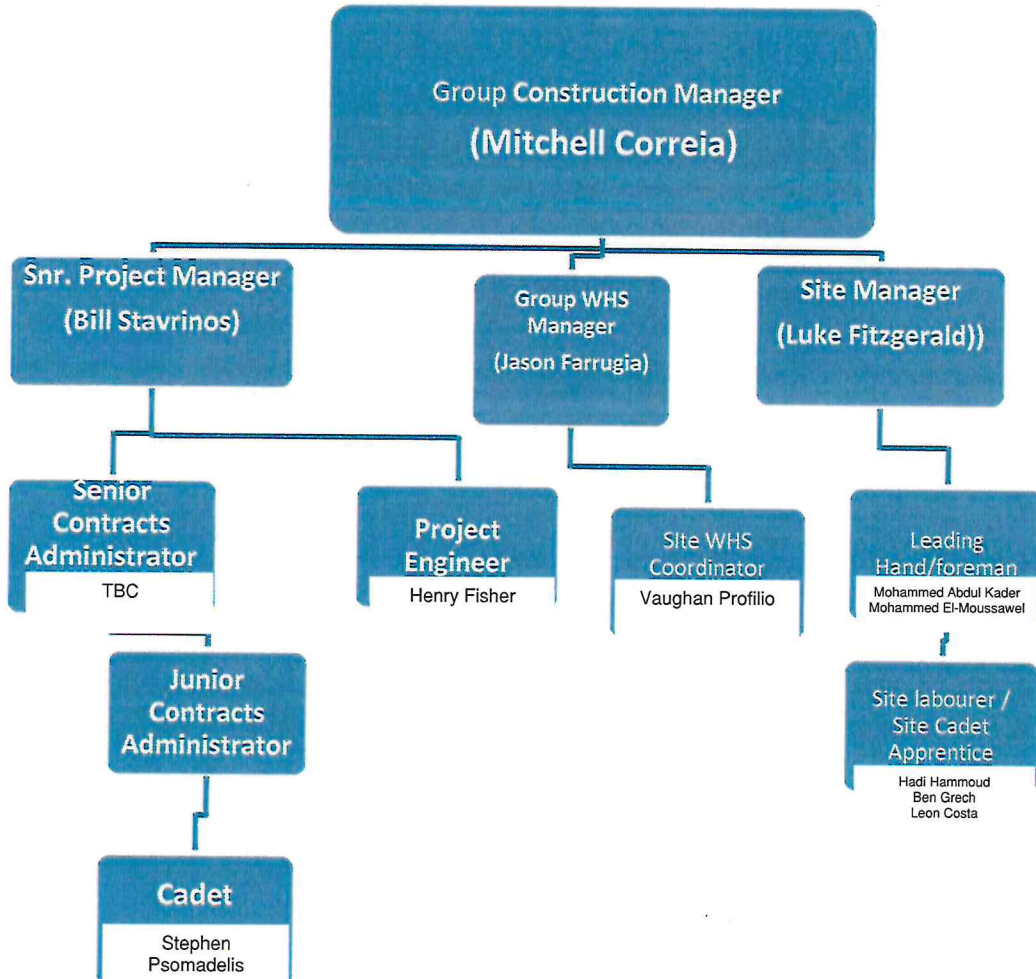
Project Objectives and Targets are in line with the Company Environmental Protection Policy and include:

- Zero environmental incidents such as spills into stormwater drain or soil
- Zero breach notices from EPA
- Minimise waste to landfill by recycling trade waste as far as possible.



2 Environmental Management and Responsibilities

2.1 Project Organisation Chart



2.2 Project Manager - Bill Stavrinou

- Management of the works in accordance with relevant statutory requirements, best practice guidelines and the requirements of the Site Environmental Management Plan;
- Suspension of site work in a specific area or areas should the environment or health and safety of personnel or the community potentially be at risk;
- Resumption of works after corrective actions have been completed satisfactorily;
- Attendance at Site Environmental Management Plan team meetings;
- Review and request update of the Site Environmental Management Plan when necessary; and
- Suspension of individuals from the site where disregard for the Site Environmental Management Plan has been identified.

Signature: _____

Date: _____

30/05/23

2.3 Site WHS Coordinator - Vaughan Profilio

- On-site development of the Site Environmental Management Plan;
- Implement the monitoring schedule required for the works;
- Day to day management of the requirements of the Site Environmental Management Plan and ensuring that the checking, monitoring and inspection of appropriate mitigation measures for contract and sub-contract personnel is undertaken.
- Managing employees / contractors and construction activities daily to ensure the appropriate environmental controls are implemented and maintained in accordance with the requirements of the Site Environmental Management Plan.
- Ensuring all staff are inducted into the site and undertake daily toolbox talks.
- Undertake 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 Site Environmental Management Plan to the Project Manager; and
- Implementing corrective actions which may be required as a result of any site inspections, audits or meeting.

Signature: _____

Date: _____

Vaughan Profilio

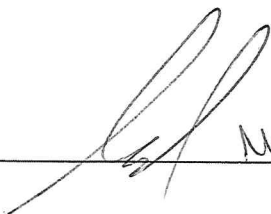
1.6.23




Site Environmental Management Plan


2.4 Site Foreman Project Engineer, Cadet

- Coordinate the implementation and revisions of the Site Environmental Management Plan to ensure the safety and protection of personnel, the community, equipment, and the environment.
- Review and approve the environmental monitoring schedule required during the works;
- To liaise with the subcontractor(s), authorities, and local community as necessary.
- To ensure that relevant licenses, clearances, permits, and approvals are in place in the appropriate manner.
- To coordinate and attend the Site Environmental Management Plan team meetings;
-
- Undertake regular inspection of the works against the requirements of the Site Environmental Management Plan.

Signature:  No Noussawel Date: 20/12/2024

Signature: Mohamad Ak  Date: 30/11/23

Signature: H. ROZE  Date: 19/06/23

Signature: Hadi Hammoud  Date: 1/06/23

Signature: _____ Date: _____

Signature: _____ Date: _____

2.5 Subcontractors

- Ensure their employees are aware of and comply with the requirements of Deicorp Environmental Management Plan (this document);
- Comply with the requirements of relevant Acts and Regulations and ensure their employees always observe them.
- Ensure supervision is suitable and employees receive adequate, appropriate environmental awareness and training to carry out their tasks,

2.5.1 Site Induction

All workers must attend the Site Induction programme prior to commencing work on site. Site Inductions shall cover, but will not be limited to:

- o COVID 19 controls and emergency procedure,
- o Correct waste disposal;
- o Hazardous Substances & Dangerous Goods;
- o Emergency procedures (including first aid) and contacts details;
- o SWMS development;
- o Safety Walks and Toolbox meetings and WHS Committee (if required);
- o Amenities;
- o Access restrictions (e.g. No Go Zones);
- o Plant management;
- o Temporary electrical installations;
- o High risk work activities and their requirements;
- o Training and qualification requirements;
- o Site safety rules, issue resolution and non-conforming contractors

Note: For further information, refer to SP02-Employment on Commnia, Induction and Training.

2.6 Approving Authority

Deicorp Projects (Showground) Pty Ltd (Deicorp) as the applicant of the project has submitted to the NSW Minister for Planning and Public Spaces for a State Significant Development Application (SSDA) under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and Part 2 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). The SSDA seeks approval for a mixed-use development at 2 Mandala Parade, Castle Hill (the site), including residential apartments, commercial and retail uses, community spaces, public plaza, basement car parking, landscaping, stormwater drainage works, infrastructure upgrades and signage strategy.

2.6.1 Condition of Approval Reference Table

Ref	Cond.	Cond. Requirement	EMP Reference	Compliance
1	12c	Prepare and submit a Hypothetical Bird Species Habitat Revegetation Plan (HBSHRP) for the Minister’s approval, that describes how approval condition 12 c) will be implemented.	3.2.6	<p>The following summarises the condition 12(c) revegetation project as addressed in the HBSHRP:</p> <ul style="list-style-type: none"> • Plan outlines ratio of 8:1 for replanting of trees with DBH of >500mm that are removed. • Plan has accounted for 600 trees (upper limit) to be cleared and 4800 trees to be replanted over 19.7ha (at density of 250 stems/ha) • Selected revegetation sites are all identified as highly degraded. • Plan confirms revegetation will be within Hypothetical Regional Park. The final amount and area of replanting required will be determined by the clearing undertaken. • Revegetation success/survivorship will consist of annual monitoring (spring) to ascertain whether 80% survival for seedling survival and weed control to 20% coverage or less. Plan includes commitment to meet success criteria should the survivorship not be met after two years. • Revegetation will be undertaken in consultation with Hypothetical State Agency. • Hypothetical Company X will be responsible for implementation and funding the revegetation project. Conditions 12(c)i-iv are addressed in the HBSHRP as highlighted above.
2	18	Dust Management Plan	3.2.4	Ensure dust from construction activities conducted onsite is kept to a minimum. This includes covering and wetting down disturbed soils.
3.				
4.				
5.				

3 Implementation

3.1 Risk Management Process

3.1.1 Step 1 - Identify Hazards and Aspects within the Workplace

It is important to identify hazards and aspects and determine how they present a risk to health and safety and/or the environment. Sources of harm, events which can lead to harm and the nature of that harm should be identified and recorded. Risk identification is an ongoing process but specifically occurs as follows:

- As a preliminary review where environmental aspects are identified.
- As part of a more detailed assessment of high-risk issues and those aspects that have or can have significant impact(s) on the environment identified in the preliminary review.
- Where change is planned.

Table 1 should be used as a guide whilst conducting hazard identification and risk assessment activities.

Environmental Risks					Environment Aspects
Physical	Chemical	Biological	Ergonomic	Miscellaneous	
Noise	Vapour	Fungi	Repetition	Stress	Air quality (dust/emissions)
Vibration	Gases	Bacteria	Weights	Shift Work	Contaminated soil/water
Temperature	Dust	Bugs/Mites	Posture	Drugs/Alcohol	Habitats (protected flora/fauna)
Lighting	Mist	Yeasts	Work Patterns	Bullying	Noise or vibration
Mechanical	Fume	Viruses	Manual Handling	Unsafe Acts	Traffic management
Humidity	Corrosives	Enzymes	Heights	Job Design	Spills & response
Ventilation					Dangerous Goods/Hazardous Substances (use/storage/spills)
Electrical	Solvents	Body fluids	Distance	Fatigue	Waste disposal
Pressure	-	Animals	Workstation Setup	-	Other.....
Machinery	-	Plants	-	-	
Housekeeping	-	-	-	-	
Fire/Explosion	-	-	-	-	

3.1.1.1 Method of Performing Risk Assessments

When performing a Risk Assessment it is important that personnel who are knowledgeable about the item that is being assessed are in attendance.

If the piece of plant or equipment is in operational condition it is an advantage to organise the assessment while the item is operating. Often a more practical solution to observed hazards can be identified while the item is operating, and specialists are available to discuss the hazard and



environmental aspects and control measures that must be implemented to remove or reduce the identified risk.

3.1.1.2 Researching sources of information

There is considerable information about aspects and hazards, which can be sourced through relevant State regulators, Safe Work Australia, and State Environment Protection regulator. The WHS and Environmental legislation and industry/hazard specific Codes of Practice are a starting point. Some of the Australian Standards also provide guidance on Environmental matters.

3.1.1.3 Statistical analysis

Analyse organisational statistics including first aid registers, incident/accident/near miss reports and injury records. Hazard/incident reports are to be used to report all identified hazards on a day-to-day basis.

3.1.2 Step 2 – Assess the Risk

Risk Assessment is the process of determining the 'level of risk' associated with a hazard.

In determining the 'level of risk', DEICORP will consider as a minimum:

- the experience of the person exposed to the hazard;
- any existing control measures;
- contributing environmental conditions; and
- pre-existing hazards

3.1.2.1 Assessing Risk using the Matrix

1. Evaluate the **consequences** if the incident occurred, using the consequence table.
2. Evaluate the **likelihood** of the incident occurring resulting in the consequences identified, using the likelihood table.
3. Calculate the **level of risk** by finding the intersection between the likelihood and the consequences.

For more details refer to the Risk Matrix on Appendix A.

3.1.3 Step 3 - Control the Risk

Once hazards have been identified and assessed, a control strategy to either eliminate or control the risk is to be developed and implemented. This process is designed to identify control strategies from the most effective to the least effective strategy. DEICORP considers control strategies in the order of the hierarchy. For more information on hierarchy of control, refer to Appendix A.

3.1.4 Step 4 – Review Controls

Once control strategies have been implemented, they should be reviewed at regular intervals with employees to ensure they are effective.



Site Environmental Management Plan

3.1.5 STEP 5 – Additional Controls, if necessary

Where the residual risk after controls have been applied is deemed to be unacceptable based on the Risk Class Table in Appendix A, further controls must be applied to reduce the risk to As Low Reasonably Practicable (ALARP). Alternatively, authorisation must be obtained to continue the work.

3.2 Site Specific Environmental Aspects and Controls

An analysis of hazards that have the potential to occur during the proposed works has been undertaken by Deicorp. Details of the potential hazard, the mode of occurrence and the proposed actions to mitigate the potential hazard in the first instance and reduce and / or control the potential hazard if the potential hazard is unavoidable have been summarised in this section.

Environmental Controls

Where civil and earthworks are to be carried out by a service provider in accordance with the contract, the following will form part of the requirement.

3.2.1 Erosion Control

Deicorp ensures that service providers carrying out any civil/earthworks barricade off all areas so that excavations and machinery do not traverse over areas that will not undergo excavation.

If erosion on this project occurs, it is dealt with by the Project Manager during the remediation phase to minimise erosion during demolition where and when required.

However, Deicorp closely monitors the site as part of the regular site checklist (Clause 4). If erosion occurs, erosion control devices are implemented immediately.

3.2.2 Drainage Plan

- The drainage system on the project site is cleaned out to remove sediments prior to commencement of any work by the civil contractor.
- Drainage of surface run-off (where and when required) will be allowed to flow along existing contours (down slope) with the existing drainage system on-site of kerbs, gutters, gully pits and pipes discharging stormwater run-off off-site.
- Stormwater grate inlets surrounding the demolition/excavation work may need to be diverted (using hay bales etc.) to reduce sediment transportation. All drainage control devices are regularly checked particularly during any rainfall periods.
- Stormwater and wastewater collected on site is treated with a substance (lime based or other with clean water) which may be pumped into stormwater. This is in accordance with all EPA requirements including a separate approval, where required to do so.
- EPA should be contacted for advice relating to water treatment prior to commencement of any flow into any drain or other waste.

3.2.3 Noise and Vibration Control

To comply with regulatory requirements where noise from the site shall not exceed the limits set out in *Protection of the Environment Operations Act 1997*, the following measures shall be undertaken:

- No machine work will occur outside the normal working hours 7.00am – 5.30pm Monday to Saturday unless otherwise approved by Council or other statutory authority.



Site Environmental Management Plan

- Normal hours for work in area as specified must be checked with local council authorities for verification
- Demolition work to comply with council's applicable guidelines for the control and regulation of noise on building sites and the required standard
- As part of the noise mitigation treatment for the project, all trucks and machinery with defective exhaust systems will be removed from site until necessary service to rectify the issue have been carried out.
- Piling, earthwork, or vehicular activities cause land vibration and potential dilapidation of nearby residences. Dilapidation reports of selected areas are to be undertaken.

3.2.4 Dust Control

To comply with regulatory requirements and control dust generated by site activities, the following measures shall be implemented:

- Ensure dust extraction or dust control is used when cutting or grinding cement/silicone products. **(NO uncontrolled cutting or grinding is permitted without adequate dust control measures)**
- Use exclusion zones when required to mitigate exposure.
- Additional precautions include the covering of haulage trucks with a tarpaulin.

3.2.5 Odour Control

To comply with regulatory requirements where odour from the site shall not exceed the limits set out in the quality of air odour control (air quality control) Act (latest publication).

In terms of demolition activity odour problems will be minimal. All plant and machinery are regularly serviced and checked for exhaust emissions.

Stormwater gully pits will be preferably hand cleaned with shovels (where required) and collected debris then bagged to minimise odour and disposed prior to pipe-work or other access areas being cleaned.

3.2.6 Flora and Fauna

To ensure the adequate protection of fauna and flora on the site, the following activities may be required:

- Avoid all unnecessary destruction of vegetation;
- Do not disturb any animals that are encountered; let them move along without interference;
- Ensure fauna ramps are placed into any open trench at the end of each day (if required by prior ecological assessment);
- Remove fauna ramps and inspect all open trench for animals prior to start of each day (if required by prior ecological assessment);
- Where potentially dangerous animals are encountered (e.g. snakes), contact the Deicorp Group WHS Manager for advice; do not interfere with the animal; and
- Sick or injured animals must be reported to Deicorp Group WHS Manager; only authorised personnel may act to relocate such animals.



3.2.7 Disposal of Hazardous Materials

- Hazardous materials (should they be located and/or found) are at first sampled and tested for their origin with the intent to verify hazardous contents under the required standards (latest publication);
- Asbestos and other hazardous materials are disposed of at a landfill nearest to the site being worked on and/or as nominated by the principal contractor and in-line with the strictest control of the EPA;
- Disposing of any hazardous material must also be in-line with local regulatory (council or other) requirements.

3.2.8 Storage of Dangerous Goods

- 1) Poor storage and handling may lead to chemical spills entering stormwater system:
 - Provide adequate chemical storage and containment facilities.
 - Provide adequate spill containment kits on site.
 - Prepare emergency response plan.
 - Provide Material Safety Data Sheets (MSDS) for all chemicals being used on site.
- 2) Incorrect disposal may lead to soil, water, or groundwater contamination:
 - Ensure appropriate methods are used to collect, handle, store and dispose of hazardous goods and prescribed wastes.
- 3) Incorrect storage of chemicals may lead to corrosion, mixing and generation of hazardous chemical mixtures and fires or explosion:
 - Separate storage of solvents, flammable / non-flammable gases and corrosive chemicals.
 - Designate specific areas for smoking a safe distance from areas where hazardous chemicals are to be used / stored.
 - Instantly remove from the site anyone seen smoking during handling of hazardous chemicals.
 - Minimise chemicals inventory on site as excessive chemical inventories on site may lead to overuse or misuse.

3.3 Groundwater

The risk to groundwater from potentially contaminated soil at the site is to be assessed by suitability qualified Environmental Engineer / Scientist and/or the completion of a Statutory Environmental Audit. Contaminated soils at site can be a source of groundwater contamination.

As dewatering can cause settlement of surrounding land, minimal dewatering to local areas only.

3.4 Waste Disposal

Aspect	Impact	Control
Wastewater	Uncontrolled disposal of wastewater to sewer.	- Ensure wastewater disposed to sewer as per Regulations.
Concrete	<ul style="list-style-type: none"> - Runoff/wastewater from mixing areas. - Runoff/wastewater from form work. - Runoff/wastewater from equipment washing. 	- Designate bunded mixing and equipment washing areas where possible.
Paint	<ul style="list-style-type: none"> - Wash water enters stormwater drains. - Incorrect disposal of paint sludge. - Paint sediment enters stormwater drains. - Incorrect storage and disposal of paint containers. 	<ul style="list-style-type: none"> - Designate bunded areas for equipment washing to prevent wash water entering stormwater system. - Dispose of acrylic paint wash water to sewer. - Settle out paint sludge from wash water and dispose of in dedicated bins. - Collect and dispose of solvent or oil based paints as prescribed waste.
Hazardous Waste & Prescribed Industrial Waste	<ul style="list-style-type: none"> - Low staff awareness leads to materials misuse and incorrect disposal. 	<ul style="list-style-type: none"> - Staff awareness training and induction. - Provide facilities for segregation, temporary storage, and disposal of hazardous wastes.
Chemicals	<ul style="list-style-type: none"> - Excessive chemical inventories on site may lead to overuse or misuse. 	- Minimise chemicals inventory on site.
Impacted Soil	<ul style="list-style-type: none"> - Excavation works uncover potentially contaminated soil. - Spills during the transport of potentially contaminated soil can result in the contamination of uncontaminated areas of the site. 	<ul style="list-style-type: none"> - Segregate soils with visual or odorous signs of contamination. - Test and classify if required and dispose of in accord with EPA Regulations.



3.4.1 Management of Heritage and Cultural Issues

Deicorp has an overall responsibility in ensuring that any of its projects has in place a major respectful element of a well-planned protection and control of all areas of heritage.

NSW State Heritage Inventory is a list of heritage items in New South Wales including Aboriginal Places, State Heritage Register, Interim Heritage Orders, State Agency Heritage Registers and Local Environmental Plans.

Items listed on the Register are subject to the provisions of the Heritage Act 1997. This Act identifies and protects heritage places and objects that are of significance to the State of NSW including:

- Historic archaeological sites and artefacts
- Historic buildings, structures and precincts
- Gardens, trees and cemeteries
- Cultural landscapes
- Shipwrecks and relics
- Significant objects.

Upon discovery of a cultural or Aboriginal object during construction activities, works should cease in the subject area and Deicorp should notify the relevant NSW Office of Environment and Heritage immediately for further advice.

Where heritage / cultural building is identified on site prior to construction work, advice from Heritage Consultant and NSW Office of Environment and Heritage shall be sought and specific plan may be developed to address legislative requirements.

In such projects:

- All construction personnel will attend a site induction that includes identification of heritage issues and requirements prior to the commencement of construction works (and / or the commencement of individual contracts).
- Inspection of heritage buildings will be undertaken prior to any site works being carried out to identify the sensitivities of the heritage buildings with regards to the works and completion of restoration works should any be required.
- Protective barriers are to be installed around all heritage buildings located on the site to ensure protection during the works.
- Construction works should be staged to provide efficient and practical access to the site and its infrastructure as required throughout the construction program. Construction works should also be staged to allow for works required to mitigate potential heritage impacts throughout the construction program, including stabilisation of built elements to be retained, and archaeological investigation and recording of areas of archaeological potential that may be disturbed during demolition works.
- No undermining of heritage building foundations will take place as part of the site works.
- Temporary stabilising elements may need to be introduced to ensure structural stability of retained built elements during and after construction works. Work method statements should be prepared to guide all stabilising elements that will be installed during the construction program. Any direct physical impacts to heritage fabric (e.g. fixing points) should be clearly detailed so that they can be considered in relation to the overall benefit of stabilising and protecting these significant elements;
- Inspection of heritage buildings during and post works to ensure the structures remain in a sound state; and

- Any proposed ground disturbance in areas identified as having archaeological potential should be undertaken in conjunction with or preceded by appropriate archaeological investigation and recording by a suitably qualified archaeologist.

To ensure the adequate protection of above ground and sub-surface heritage items on the site, the above listed activities should also be undertaken in accordance within recommendations made within in the relevant Heritage Consultant Report.

3.5 Consultation

Specific impacts and associated environmental control measures may not be fully described in the Environmental Impact Assessment stage of a project. For this reason, government agencies that have Environmental Protection responsibilities may need to be consulted as part of an EMP's preparation. Any agency consultation undertaken at this stage should be limited to that required by specific conditions, or clarify specific issues, or obtain other approvals, licences or permits.

- Authorities that typically need to be consulted include:
 - Department of Environment and conservation
 - The department of primary industries
 - NSW heritage office, and
 - local councils

During the preparation of an Environmental Management Plan (EMP), all relevant parties should be consulted as early as possible to facilitate a reasoned response.

Broader community involvement in the EMP may also be appropriate, depending on the type of project. Community liaison groups are often established for larger projects. These groups may comment on the specific environmental management measures to be considered in an EMP.

In all cases, the specific requirements arising from the environmental assessment and consultation should be established and defined as early as possible for inclusion in the EMP.

3.6 Community Complaints

Community complaints will be directed to the Project Manager who will issue the complaint to the appropriate site personnel for action.

A record of all complaints filed for future inspection, if requested by the community or other third parties.

The Community Complaints Register will record the following information:

1. **Complainant Details:** Name, Address and Phone No.
2. **Nature of Complaint:** Detail of the particular issue, date of incident, people involved, location of incident or concern and method of communication for the complaint (i.e. in person, by phone or in writing).
3. **Action Taken or required:** Action proposed or undertaken to address the complaint. Time/date of action.
4. **Complainant Response to Action:** Was complainant satisfied with outcome of the complaint, if not what else needs to be done, or is it outside the scope of this contract?



5. **Prevention of Re-occurrence:** If the complaint relates directly to an operational problem what action has been taken by Deicorp to ensure that the problem will not happen again?

3.7 Site Environmental Emergency Management

In the event of an emergency, the safety of people should always be the FIRST priority.

Group WHS Manager, Construction Manager, Project Managers are to ensure each project has an Emergency Management system which has been structured to the project. The project team and all site-based staff are to be inducted into the project specific Site Emergency Management Plan based on SP07-2-Emergency Management, and the Emergency Management Plan.

Refer to Site Emergency Poster (Form 23) for details including COVID 19 Plan/Procedure– Form 23(a)

The Site Emergency Plan will be tested and reviewed annually. Records of the test will be as per the procedure. Where any non-conformances occur, the Management uses the process outlined in SP07-2-Emergency Management to take corrective actions. Any revisions to the emergency plan and procedures will be managed as per the Internal Document Control Procedure (refer to IMS document Section 4.2.1).

In case of an actual emergency, the Emergency Management Plan will also be reviewed and revised as necessary.

Environmental incidents shall be dealt with as per the SP06-2-Incident Management Procedure.

4 Inspection and Monitoring

The following inspection and monitoring program will be conducted at the site. The results of these activities will be recorded on the inspection / monitoring data sheets to be completed by the relevant Deicorp employees as part of their inspection and monitoring requirements. Intervention will be undertaken to address site conditions considered inappropriate for ongoing works (e.g. damage to signage or fencing).

Activity	Frequency	Responsibility
1) Inspect security fencing of site.	Daily	Site Foreman
2) Inspect signage for dangerous areas of the site.	Daily	Site Foreman
3) Inspect security lighting locations.	Daily	Site Foreman
4) Inspect content and quantity of material in bins.	Daily	Site Foreman
5) Inspect site for general tidiness and to ensure no illegal dumping of wastes.	Daily	Site Foreman
6) Inspect roads abutting the site for soil, sand, clay or stones originating from the construction activities on site.	Daily	Site Foreman



Site Environmental Management Plan

Activity	Frequency	Responsibility
7) Monitoring of asbestos removal must be conducted based on the risk to human health posed by the activity required.	As required	Asbestos Contractors
8) Monitor site remediation works in accordance with the remediation plan.	As required	Site Foreman

Internal audits of the complete Integrated Management System will be performed annually prior to the annual external Quality, Safety and Environmental Audit at the times noted in the Internal Audit Schedule. Each element of the Integrated Management System is in scope for the audit and scored by importance based on the risks associated with non-conformance. A target level of compliance is indicated in the Internal Audit Schedule.

The Auditor enters any non-conformances from the audit into the Incident/Improvement Reports and the relevant Staff are notified of the improvements required by providing them with a copy of the audit relevant worksheet.

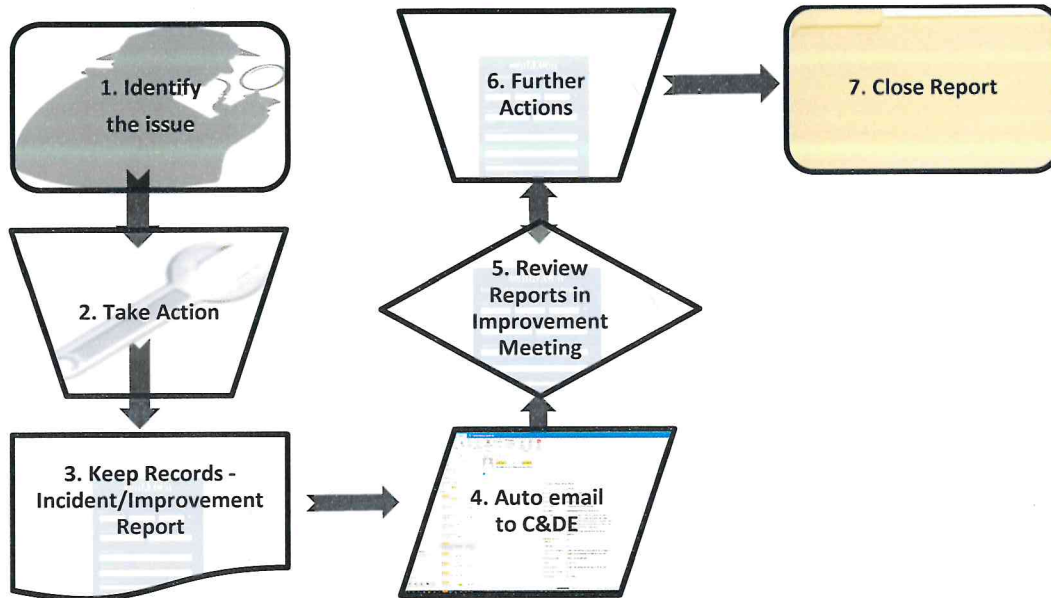
4.1 Corrective Actions

Where breaches to WHSE requirements are identified through Safety Walks, WHSE Audits, daily monitoring or otherwise reported, Deicorp will determine appropriate corrective actions to remedy and also prevent the re-occurrence of any similar non-conforming matter.

Non-conformances shall be closed out by WHSE Coordinator or Site Foreman, after reviewing the effectiveness of implemented controls. If controls are inadequate, they shall be reviewed and amended as appropriate, after consultation with the relevant stakeholders.

Any changes to controls or identified hazards; shall be documented in the Site Environmental Management Plan, and / or SWMS.

The process for dealing with non-conformances is outlined in the IMS section 4.1 and as illustrated below.



4.2 EMP Review

Documents including the Environmental Management Plan template are reviewed annually by Construction & Development Executive / Group WHSE Manager and Group Construction Manager. Management System Overview, Company Policies, System Procedures, Forms and other management system related documents are to be authorised.

Online working copies of version of all system documents will be available on online via COMMNIA which is accessible to all personnel as PDF files or Word templates with edit right limited to the Construction & Development Executive, Group WHSE Manager and Group Construction Manager.

Master copies of documents are available through J: Drive and editable by the Construction & Development Executive, Group Construction Manager and MD.



4.3 Performance Indicators

Item	Performance Indicator
1) Site Security	Site remains secure and security breaches rectified as soon as is practical.
2) Signage	No incidences due to absence or adequacy of signage.
3) Lighting	No community complaints regarding security lighting.
4) Hours of work	No work conducted outside normal hours (7.00am to 5.30pm Monday to Saturday) unless otherwise approved Council and where practical use measures to suppress noise and air emissions/dust.
5) Housekeeping	Site remains tidy. No complaints from local community or relevant regulatory authorities received.
6) Illegal Dumping	No occurrence of illegal dumping of waste at site or in general site waste bins.
7) Public Roads	Adjacent public roads not affected by soil, sand, clay or stones originating from the construction activities on site.
8) Asbestos	Removal of asbestos conducted in accordance with relevant guidelines and regulations where encountered.
9) Remediation	Works conducted in accordance with plan where required.
10) Non conformance	Non-conformances reported and rectified where possible and as soon as is practical.

Appendix A – Site Layout Plan



**Aerial view of site at 2 Doran Drive, Castle Hill – site is outlined in orange
(Source: Nearmap)**



Appendix B – Plant Register

(Plant Register located in site folders with plant checklists)

CERTIFICATE OF REGISTRATION

DeiCorp Pty Ltd

Level 3, 161 Redfern Street, Redfern, NSW 2016, Australia

Has been assessed and certified by Compass Assurance Services to the following management systems, standards and guidelines:

ISO 9001:2015

QUALITY MANAGEMENT SYSTEMS

ISO 45001:2018

OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEMS

ISO 14001:2015

ENVIRONMENTAL MANAGEMENT SYSTEMS

The scope of the certification covers the following activities:

Property development and construction for mixed use residential, commercial and retail real estate.



Managing Director



CERTIFICATION DATE:

29 March 2023

DATE OF ISSUE:

3 April 2023

EXPIRY DATE:

29 March 2026

CERTIFICATE #:

4692-2934-01