

DELTA GROUP
SHAPING TOMORROW

**CONSTRUCTION
ENVIRONMENTAL
MANAGEMENT PLAN**



DELTA PTY LTD (TRADING AS DELTA GROUP) | ABN 67 007 069 794

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN



Delta Pty Limited ABN: 67 007 069 794

Head Office: 33 Port Road, Thebarton South Australia, Australia, 5031

Telephone– +61 8351 3620



Project Name:	Leigh Creek Future Township Transformation Project (Phase 1)		
Client Names:	Department for Infrastructure and Transport		
Project Address:	Leigh Creek, South Australia		
Demo Scope:	Demolition Program 2 (DP2)		
Site Approval by (Project Manager):	Name: Harry Pickard	Signature:	Date: 25/01/2022
	Name: Adrian Neal	Signature:	Date: 25/01/2022
Site Supervisor:	Name: James Vari	Signature:	Date: 25/01/2022
	Name: Harry Pickard	Signature:	Date: 25/01/2022
Project Manager (Responsible for Implementation):	Name: Harry Pickard	Signature:	Date: 25/01/2022
Project Director (Approved for use on site):	Name: Petar Kleut	Signature:	Date: 25/01/2022
CEMP Review DBD Environmental	Name: Jack Horan (BSc MBA CEnvP (SC))	Signature: 	Date: 25/01/2022



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DISCLAIMER

This document has been developed to assist the Delta Group to better understand and manage workplace safety and workers' compensation issues in the workplace. While every effort has been made to ensure the accuracy of the material in this document, this publication is not meant to substitute for the legislation. For the specific requirements on an issue covered in this document, persons should refer directly to the relevant legislation in their location.

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1.	Background	6
1.1.	Introduction.....	6
1.2.	Leigh Creek Overview	6
1.2.1.	Project Description Scope of Works (SOW)	6
1.3.	Purpose.....	7
1.4.	Table 1 Project Overview.....	8
1.4.1.	Key Stakeholders	8
1.4.2.	Project Organizational Structure	8
1.4.3.	Project Location	9
1.4.4.	Environmental context of the project	9
1.4.5.	Environment Policy	9
2.	Environmental Management System	10
2.1.	HSEQMS Overview	10
2.2.	Delta Environmental Management Roles and Responsibilities Overview	10
2.3.	Environmental Management Commitments.....	10
2.4.	Table 2 – Objectives and Targets.....	11
2.5.	Legal and Other Requirements.....	14
3.	Environment Risk Management	15
3.1.	Planning.....	15
3.2.	Management Systems	15
3.3.	Management Systems Reviews	15
3.4.	Environmental Aspects and Impacts Assessment	16
3.5.	Risk Register (SEF 068).....	16
3.6.	HIRAC Project Wide Risk Assessment.....	16
3.7.	Standard Work Procedures	17
4.	Delta Roles and Responsibilities	17
4.1.	Project Director (PD)	17
4.2.	Project Manager	17
4.3.	Project Engineer	18
4.4.	Project Supervisors	18
4.5.	HSE Advisors	18
4.6.	Delta Project Personnel / Subcontractors	19
5.	Environmental Training and Induction	19
5.1.	Training and Inductions.....	19
6.	Documentation and Document Control	20
7.	Communication and Consultation	20
7.1.	Internal Communications	20
7.1.1.	Operation.....	20
7.1.2.	Operational Control	20

7.2.	External Communications	21
8.	Management of Change	21
9.	Emergency Response	21
10.	Incidents	22
10.1.	Incident Reporting	22
10.2.	Corrective and Prevention Actions	22
11.	Monitoring, Measurement and Reporting.....	23
11.1.1.	General site monitoring	23
11.2.	Performance and Auditing	23
12.	Environmental Management	24
12.1.	Approvals and Permits	25
12.2.	Exclusion Areas – Environmental	25
12.3.	Exclusion Areas – Aboriginal Heritage Sites	25
12.4.	Environmental Control Measures / Erosion and Sediment Controls (AUD 005)	25
12.5.	Import And Export of Fill Material.....	26
12.6.	Noise and Vibration	26
12.7.	Air Quality (Dust and Odour).....	26
12.8.	Solid Waste Management	27
12.9.	Water Management	28
12.10.	Protection of Existing Flora and Fauna	28
12.11.	Ground Disturbance and Management	28
12.12.	Cultural and Heritage Management	29
13.	Asbestos Management	29
14.	Hazardous (Chemical) Materials Management	30
14.1.	Spill Response.....	30
15.	Waste Management	30
16.	Greenhouse Gas Emissions and NGERs Reporting	30
17.	Fire Management.....	31
18.	Rehabilitation.....	31
19.	Control of Environment Risk (Guide)	31
20.	Demobilisation and Handover	32
21.	Appendix A: Environmental Policy	34
22.	: Appendix B Site Plan	35
23.	Appendix C Demolition Zones.....	36
24.	Appendix D Demolition DP1 & DP2 Zones	37
25.	Appendix E ACM & Demolition Proposed Sequence of Work	38
26.	Appendix F Emergency Contact Directory	39
26.1.	Appendix G Site Communications:	40

1. Background

1.1. Introduction

This Delta Group (Delta) Construction Environmental Management Plan (CEMP) details the principles, practices, and procedures to be implemented by Delta to manage and mitigate potential adverse environmental impacts during deconstruction activities of the Leigh Creek Future Township Transformation Project (Phase 1) Project, Demolition Program 2 Works.

The CEMP identifies hazards and risks that Delta Group business and personnel may be exposed to during work. The plan details the control measures to be implemented to regulate these hazards and risks. The risk management process involves the use of policies and procedures compliance, forms and checklists, education, training and supervision, and continual improvement in all areas required of the environment.

The model in AS/NZS 4581 Management System Integration and the guidelines in Standards Australia Handbook Guidance on integrating the requirements of Quality, Environment and Health and Safety Management Systems form the basis for the Delta Group IMS.

This document is intended to be used in conjunction with and following the principles set out in ISO 14001. The standard does not set specific levels of performance; however, it does include requirements that are mandatory for the implementation of specific principles and applicable when such principles are adopted.

REVIEW: This Management Plan will be reviewed on an as needs basis, it will be revised to ensure it remains up to date. Project Management will ensure so far as is reasonably practicable, that each person carrying out work in connection with the project is made aware of any revision to this plan.

A trigger to review is when a control measure does not control the risk it was implemented to control, or, a notifiable incident occurs, or, a new relevant hazard or risk is identified, or the results of consultation indicate a review is necessary, or a change to the workplace itself or any aspect of the work environment, or a change to a system of work, a process, or a procedure.

1.2. Leigh Creek Overview

Leigh Creek is a former coal mining town located approximately 600 kilometres north of Adelaide in South Australia. Coal was discovered in 1888 and has been mined sporadically. The Leigh Creek township was developed in 1946 and relocated 22 kilometres south in the early 1980s to allow for mine expansion. The mine was privatized in 2000 and operated by Flinders Power Partnership, producing over 2.5 million tons of coal per year, until operations ceased in November 2015.

In January 2017, the ownership and management of the Leigh Creek Township transferred to the South Australian Government from Flinders Power, following the closure of the coal mine and associated power generation assets.

By the time the mine closed there were only 300 people residing in Leigh Creek, and this has reduced further to a transitory population of approximately 120 people. As a result, the township has an oversupply of buildings, which are rapidly deteriorating in condition.

A submission seeking Cabinet approval of a recommended Future Township Scenario where Leigh Creek becomes a sustainable, open, and self-sufficient town and regional centre for the people comprising the wider northern Flinders Ranges district was approved in November 2020.

The Future Township Scenario and 2020 Township Transformation Plan encompasses the physical transformation of the township and includes:

- Demolition of surplus housing, commercial and community facilities; and
- A demolition compliance and safety program which includes asbestos and waste disposal

1.2.1. Project Description Scope of Works (SOW)

Delta shall ensure the requirements of this CEMP is adhered to and must perform and complete (SOW) in accordance with PPR Brief. This PPR Brief represents an amalgamation of requirements of the principal (DIT) and various stakeholders. These requirements include Site and Project descriptions, functional requirements, area relationships and performance requirements. It is structured to assist the reader in gaining an appreciation of these requirements by progressing from broad to detailed issues.

The Brief forms part of the PPR documentation suite and must be read in conjunction with Delta developed deconstruction activities and methodologies for the Project and are further outlined in detail in the Delta Demolition and Asbestos Methodology, specification documents and related sub-management plans.

The PPR must be read by Delta in conjunction with the Contract Specification, the Drawings, Schedules, and Appendices of the Contract 4468-A-2021, which outline the full technical and documentation requirements for the delivery of Goods and Services, Personnel (including management and supervision of Personnel) and Plant and Equipment, necessary for the Leigh Creek Future Township Transformation Demolition Program 2.

Demolition Program 2 comprises of removal or demolition of existing structures and services within the identified demolition zone (DP2). The scope incorporates clearing the site of existing structures, building footings, concrete footpaths, and driveways, with removal of existing services as required.

The scope of works includes, but is not limited to:

- Complete removal of existing specified buildings associated structures and fencing within the DP2 demolition zone.
- Removal of existing concrete slabs, footings, concrete footpaths, and driveways (roads and kerbs to remain).
- Removal of vegetation (with the exception of trees with high ecological and/or amenity value), paving, boulders, gravel, and irrigation.
- Civil, structural and services requirements in line with this PPR Brief; and
- ACM removal and disposal requirements in line with this PPR Brief.

The extent of demolition zones DP1 & DP2 are illustrated in Appendix C, D & E

An Early Works package will comprise of ACM removal from the DP1 zone and disposal of all materials at the Leigh Creek mine cell (to be coordinated through Eyre Advisory Service (EAS)). Separate Contract Works after this Contract will include the removal or demolition of existing structures and services within the DP1 demolition zone.

1.3. Purpose

The purpose of this Construction Environmental Management Plan (CEMP) is to define Delta Groups environmental responsibilities, commitments, and compliance obligations in accordance with the project environmental requirements in the execution of our scope of work (SOW) that are detailed in Department for Infrastructure and Transport (DIT) Project Requirements (PPR) Brief.

This CEMP shall be used to manage all known environmental aspects and impacts during the Project's deconstruction phase and relevant to the Delta scope. The CEMP will ensure that appropriate environmental management practices are followed during the Project's construction phase and has been prepared to cover elements of ISO14001:2015 Environmental management systems as well as Management Procedures, which form the basis for environmental control of Delta project activities.

Where Company or legal requirements differ from this CEMP, the more stringent of the two requirements shall be followed.

This CEMP defines details of who, what, where and when environmental management and mitigation measures are to be implemented. The CEMP covers all anticipated SOW for the deconstruction elements, activities and presents a framework of principles, environmental policy, objectives and strategies and performance standards as well as processes for implementing good environmental management. This CEMP establishes the relationship with the related environmental sub-management plans (sub-plans).

The CEMP key elements is structured to follow bridging documents which support environmental management, including,

- The key objective of this Project is to safely remove all asbestos containing materials (ACM) from the identified demolition zones and demolish existing structures, services and fencing as identified by DIT.

This CEMP is structured to follow the following.

- DIT Principal's Project Requirements (PPR) Brief
- DIT Minimum Safety Expectations (Detailed within Delta WWHSMP Section 22 & 24 refers)
- Asbestos report Leigh Creek Township FLP 7026 (DOC REG L98/00001)
- Delta Work Health Safety Management Plan (WWHSMP)
- Delta Project Management Plan
- Delta COVID-19 Infection Control Management Plan
- Delta Asbestos Management Plan
 - Pre-Demolition Hazardous Materials Assessment
- Delta Traffic Management Plan
- Delta Demolition Method Statement

- Delta Demolition Specification

The purpose of this plan is to ensure that the All personnel working for Delta, at the Leigh Creek Future Township Transformation Demolition Project, have a basis to achieve the goal of zero harm while achieving our objectives as detailed in our Delta WWHSMP plan and to ensure that Delta employees and the public are not placed at risk through its operations and to strive to prevent all accidents injuries and occupational illness through the active participation of every Employee.

1.4. Table 1 Project Overview

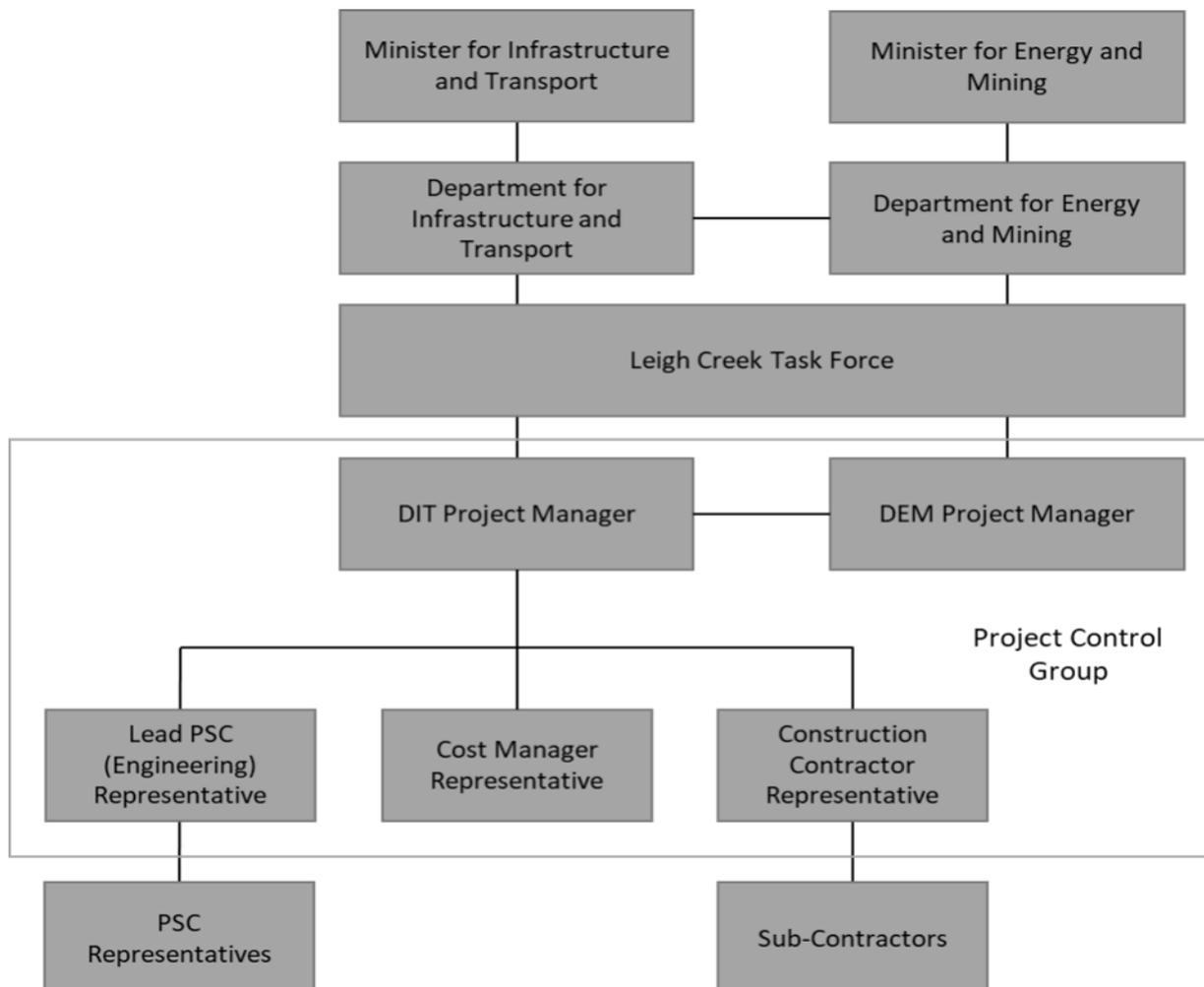
Project Name:	Leigh Creek Future Township Transformation Project (Phase 1)
Job Number:	S1 -051
Company Contract Number:	4468-A-2021
Company:	Delta Group
Start Date:	06/12/2021
Completion Date:	May 2022
Duration:	6 months

1.4.1. Key Stakeholders

The following key stakeholders have been identified:

- Leigh Creek Task Force
- Outback Communities Authority (OCA)
- Local community and surrounding regional communities
- Local businesses
- Traditional owners (represented by Adnyamathanha Traditional Landowners’ Association (ATLA in Special Administration)

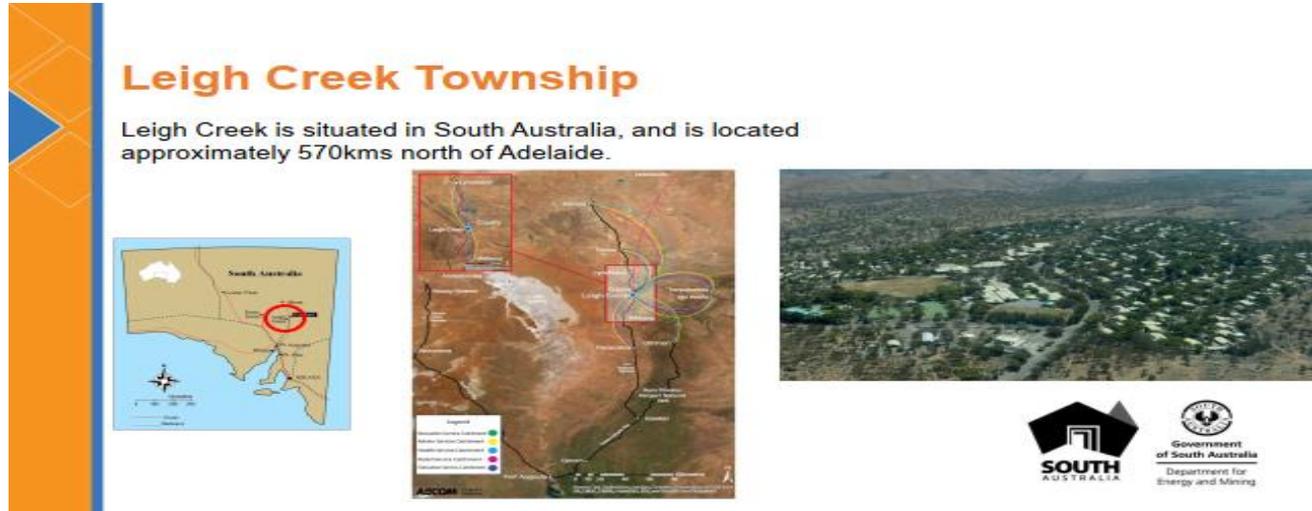
1.4.2. Project Organizational Structure



1.4.3. Project Location

Leigh Creek is a former coal mining town located approximately 600 kilometres north of Adelaide in Eastern Central South Australia. For reference, a site plan is illustrated in Appendix B.

The Leigh Creek township land areas which will be impacted by the Phase 1 Demolition works packages are covered by C/T 6188/21, CT 6130/122, C/T 6130/110, and C/T 6130/111. All land areas are in the ownership of the Minister for Infrastructure and Transport (as successor to the Registered Proprietor being Minister for Transport, Infrastructure and Local Government).



1.4.4. Environmental context of the project

The CEMP is a “live” document that will address new activities that may arise and incorporate any legislative changes or best practice conditions which may evolve from time to time. This CEMP follows the structure of AS/NZS ISO 14001: 2015 to demonstrate how Delta manages its operations to minimise risk to the environment. The purpose of this CEMP is to:

- Maintains an up-to-date version of this CEMP onsite
- Provides a copy of the current version of the Plan to the Client
- The scope of works is referenced in the Project Plans
- Reviews the Plan on an as needs basis to maintain its currency
- Ensures all amendments to the Plan are communicated to persons involved in the works
- Ensure all our people are involved in continuous improvement of our Safety Management System

Key Delta environmental aspects that may apply in the context of this project include:

- Ground Disturbance
- Spill Response
- Waste Management
- Flora and Fauna
- Dust
- Water
- Heritage Management
- Air Emission
- Noise
- Demobilisation and Rehabilitation

This CEMP and the various environmental sub-plans may require review and amendment during the life of the Project to reflect changes to activities, risks, mitigation measures, responsibilities, and management processes. The ability to make changes to the CEMP is an important aspect of continually improving the effectiveness of the CEMP.

1.4.5. Environment Policy

This policy outlines the key environmental objectives, key performance indicators and environmental management of our personnel working on the Project.

Delta's Environment Policy outlines its commitment to deliver its services and activities in an environmentally sustainable and responsible manner. The policy is reviewed annually by Delta's management team and approved by the Board.

The policy is communicated via onsite induction process, is displayed in the workplace, and can be accessed via Delta's website.

Delta policy approach underpinning the alignment for the Project, including:

- The Delta environment policy is aligned in accordance with the DIT Principal's Project Requirements (PPR) Brief
- The Delta environment policy is communicated to all Employees and is displayed prominently on site
- Key environmental elements of the policy will be included in site inductions and displayed on site noticeboards
- Key Performance Indicators (KPIs) will be developed by the Delta prior to deconstruction

Delta and Subcontractor personnel shall comply with the policies, procedures, practices, and laws applicable to their assigned duties and responsibilities.

A copy of the current Delta Environmental Policy is included as Appendix A.

2. Environmental Management System

2.1. HSEQMS Overview

The primary purpose of this CEMP is to demonstrate sound environmental performance through control of impacts on the environment, and are consistent with this CEMP and the client's bridging documents:

Whilst all Delta are encouraged to establish and maintain their own Environmental Management System (EMS), compliance with this CEMP and the Delta IMS is required as a minimum.

2.2. Delta Environmental Management Roles and Responsibilities Overview

All staff, contractors, and other positions under the direct control of Delta have a general duty under the various Environmental legislation to:

- Not cause or allow serious environmental harm or material environmental harm; or
- Intentionally or otherwise, cause pollution or an unreasonable emission from any premises.

The minimum responsibilities and accountabilities for Delta staff are documented in position descriptions, each of which will have some level of role, responsibility, and authority for managing environmental aspects. This may include implementing operational controls, risk treatment plans, programs, or other administrative controls. An outline of the roles, responsibilities, and authorities at key levels are displayed in [Table 1 below](#).

2.3. Environmental Management Commitments

The tables presented below summarises the environmental management commitments for each of the environmental themes, including:

- CEMP Objective(s) – the relevant high-level environmental management objective;
- Environmental Risk – the relevant risk identified;
- Management Strategy – how Delta broadly intends to meet / approach the environmental management objective;
- Control(s) – the summarised controls in place to ensure objectives are met;
- Monitoring – how the outcomes of implementing the controls will be monitored. The level and frequency of monitoring will be relative to the risk rating of the objective;
- Reporting – how performance will be reported within and outside the organisation (where applicable);
- Performance indicator(s) – performance measurement that evaluates the successes of control implementation; and
- Planned works – broad scope of works to manage the risk.

Table 1: Delta Environmental Roles and Responsibilities

Role	Responsibility
Managers	Members of the Management Team are responsible for ensuring environmental stewardship and accountability within their specific function. Specific responsibilities include: <ul style="list-style-type: none"> • CEO is responsible for leading the culture of the organization regarding environmental stewardship. The CEO delegates responsibility for various risk mitigation initiatives and approves resources in consultation with the Managers. • Managers are responsible for annual workforce planning to ensure adequate resources and budget is available for the implementation of Environmental Management System. • DIT Principal's Project Requirements (PPR) Brief • DIT Minimum Safety Expectations
HSE Manager	The HSE Manager has overall responsibility for the coordination of environmental management aligned with the requirements of AS/NZS ISO 14001:2015. This includes: <ul style="list-style-type: none"> • the development of the CEMP. • reporting on environmental management system performance; and • providing recommendations for continual improvement to the Management Team for review.
Employees	All staff are required to: <ul style="list-style-type: none"> • adhere to this CEMP; and • contribute to developing and implementing risk treatment plans for significant environment aspects that are applicable to their workarea.
Contractors	Contractors and service providers are expected to adhere to the CEMP when operating on behalf of or directly for the client
Lessees / licensees	Lessees and licensees must adhere to the conditions in their commercial agreements with DIT to ensure the environmental impacts from their activities are managed. They must also abide by environment and heritage legislation as a minimum

2.4. Table 2 – Objectives and Targets

Delta environmental objectives and targets have been established as a means of assessing environmental performance during the deconstruction activities of the Project. The objectives and targets are consistent with Delta's Environmental Policy objectives. Table 2: Overview of our key environmental themes and objectives.

Delta Objectives and Targets are based upon the identified environmental risks detailed within the clients' key environmental themes and objectives associated with the Scope of Works and are presented in the table below.

Objective	Target	Management	Measurement Tool
Perform the Project SOW in accordance with DIT Principal's Project Requirements (PPR) Brief	Minimise vegetation clearing during deconstruction <ul style="list-style-type: none"> • Site Establishment • DP 1 ACM removal Only (Demolition by others) • DP2 ACM and Demolition 	Delta's Traffic Management Plan and WHSMP No clearing or disturbance during deconstruction outside pre-defined clearing lines DP2, As outlined in DIT Principal's Project Requirements (PPR) Brief <ul style="list-style-type: none"> • Addendum No.2 • Addendum No 3 • Addendum No 4 <u>Separate Contracts</u> Works after this Contract will include the removal or demolition of existing structures and services within the DP1 demolition zone	<ul style="list-style-type: none"> - Audits, construction compliance PPR, reporting, management review. - Environmental awareness topics delivered to work group SWMS, in toolbox and prestart - Routine inspections on and off-site recorded on daily inspection records <ul style="list-style-type: none"> • SEF 073 Pre-Audit Environment Assessment (Site Walk) (2) • SEF 006 Environmental Aspects and Impacts Assessment (3) - Site Inductions and training completed
Air Quality (Dust and odour)	Ensure the air quality in and around the site meets the requirements in the Environment Protection (Air Quality) Policy 2016 (Air Quality EPP)	See Section 12.7 Mobile water trailer with powered pump and gurney Vehicle Movements on designated roads DIT Principal's Project Requirements (PPR) Brief <ul style="list-style-type: none"> - Minimize impacts on the community from site sourced air emissions. 	<ul style="list-style-type: none"> - Environmental awareness topics delivered to work group SWMS, in toolbox and prestart - Routine inspections on and off-site recorded on daily inspection records <ul style="list-style-type: none"> • SEF 073 Pre-Audit Environment

		<ul style="list-style-type: none"> - Minimize greenhouse gas emissions and continually improve energy efficiency - Stabilisation of cleared areas by regular light watering to minimise soil transport by wind - Preventing soil from leaving the site via traffic movement to prevent the creation of dust in dry conditions 	<p>Assessment (Site Walk) (2)</p> <ul style="list-style-type: none"> • SEF 006 Environmental Aspects and Impacts Assessment (3)
Site Contamination (ACM)	<ul style="list-style-type: none"> • Protocols for the identification and management of potentially contaminated fill materials, asbestos and asbestos containing materials (ACM). • National Environment Protection (Assessment of Site Contamination) Measure 1999 and relevant guidance issued by the EPA <p>Guidelines for the Assessment and Remediation of Site Contamination Work Health and Safety Act 2012</p>	<p>See Section 12 DIT Principal's Project Requirements (PPR) Brief</p> <ul style="list-style-type: none"> • Addendum No.2 • Addendum No 3 • Addendum No 4 <p>- Unexpected finds procedure & SOP followed.</p>	<ul style="list-style-type: none"> - Refer to Asbestos Management Plan - DP1 & DP2 ACM <ul style="list-style-type: none"> • Airborne Fibre Monitoring results • Clearance Certificates - Compliance with PPR - Environmental awareness topics delivered to work group SWMS, in toolbox and prestart - Routine inspections on and off-site recorded on daily inspection records <ul style="list-style-type: none"> • SEF 073 Pre-Audit Environment Assessment (Site Walk) (2) • SEF 006 Environmental Aspects and Impacts Assessment (3)
Noise & Vibration	<ul style="list-style-type: none"> • Noise emissions associate with demolition operations • ensure construction activity resulting in noise with an adverse impact on amenity does not occur or commence except as permitted by the Noise EPP • Environment Protection (Noise) Policy 2007 	<p>See Section 12.6 Location of activities do not give rise to noise having an adverse impact on amenity.</p> <p>DIT Principal's Project Requirements (PPR) Brief</p> <p>Minimize impacts to the community from site sourced noise emissions</p> <p>Hours of operation</p> <p>Operating equipment and handling materials so as to minimise impact noise (such as avoiding dropping materials from height)</p>	<p>Environmental awareness topics delivered to work group SWMS, in toolbox and prestart</p> <p>Routine inspections on and off-site recorded on daily inspection records</p> <ul style="list-style-type: none"> • SEF 073 Pre-Audit Environment Assessment (Site Walk) (2) • SEF 006 Environmental Aspects and Impacts Assessment (3)
Minimise erosion	<ul style="list-style-type: none"> • No significant erosion within the demolition DP2 zone 	<p>DIT Principal's Project Requirements (PPR) Brief</p> <ul style="list-style-type: none"> • Addendum No.2 • Addendum No 3 • Addendum No 4 	<p>Environmental awareness topics delivered to work group SWMS, in toolbox and prestart</p> <p>Routine inspections on and off-site recorded on daily inspection records</p> <ul style="list-style-type: none"> • SEF 073 Pre-Audit Environment Assessment (Site Walk) (2) • SEF 006 Environmental Aspects and Impacts Assessment (3) <p>And monitor ongoing as demolition progresses</p>
Prevent contamination of surface and groundwater through spills of hydrocarbons and chemicals	<ul style="list-style-type: none"> • No spills during deconstruction • Dangerous Substances Act 1979 • Local Nuisance and Litter Control Act 2016 	<p>Effectively manage existing services and activities to ensure water resources are:</p> <ul style="list-style-type: none"> • used efficiently and protected; and 	<p>Environmental awareness topics delivered to work group SWMS, in toolbox and prestart</p> <p>Incident reporting and close out within agree time frames</p>

		<ul style="list-style-type: none"> Maintain long-term security of DP 1 (ACM Only) & DP 2 zones during ACM & deconstruction activities 	<ul style="list-style-type: none"> SEF 010- Incident Report <p>Routine inspections on and off-site recorded on daily inspection records</p> <ul style="list-style-type: none"> SEF 073 Pre-Audit Environment Assessment (Site Walk) (2) SEF 006 Environmental Aspects and Impacts Assessment (3)
Ensure impacts on Threatened and Priority Flora and Fauna are adequately identified and minimised during deconstruction	<ul style="list-style-type: none"> Impact to protected fauna habitat is minimised Areas containing Threatened and Priority Flora species and communities not to be disturbed are clearly delineated in the field for the duration of the deconstruction works in that area Native vegetation act 1991 Native Vegetation (Prescribed Areas) Variation Regulations 2021 National Parks and Wildlife Act 1972 	<p>DIT Project Requirements (PPR) Brief</p> <ul style="list-style-type: none"> Addendum.2 Addendum 3 Addendum 4 <p><u>Note: Any trees with high ecological and/or amenity value will be identified by the Outback Communities Authority (OCA) and be clearly identified prior to demolition works commencing</u></p> <p><u>Environmental/township value, no trees have been identified by the OCA as being of significance.</u></p> <p><u>All trees and shrubs that are not directly affected or restrict access for the demolition works are to remain to assist in the natural course of the land returning to natural habitat.</u></p> <p>Minimize impacts to flora, fauna and vegetation will be minimised where possible within the project constraints.</p> <p>Where encountered local Flora and Fauna to be included in any Clearing Permits as applicable</p> <p><u>Note: All fallen or dead trees in demolition area affected and or associated with the demolition works are to be considered building waste and transported and disposed of with building waste.</u></p>	<p>Reported incidents/NCRs are investigated and closed out</p> <p>Environmental awareness topics delivered to work group SWMS, in toolbox and prestart</p> <p>Routine inspections on and off-site recorded on daily inspection records</p> <ul style="list-style-type: none"> SEF 073 Pre-Audit Environment Assessment (Site Walk) (2) SEF 006 Environmental Aspects and Impacts Assessment (3)
All deconstruction waste tracked and minimised	<ul style="list-style-type: none"> Standard for the production and use of Waste Derived Fill Current criteria for the classification of waste – including Industrial and Commercial Wastes (Listed) and waste Soil 2010 	<ul style="list-style-type: none"> DIT Project Requirements (PPR) Brief An Early Works package will comprise of ACM removal from the DP1 zone and disposal of all materials at the Leigh Creek mine cell (to be coordinated through Eyre Advisory Service Transportation and disposal of all ACM and building waste at the Leigh Creek mine cells (to be coordinated by the 	<p>Wastes tracked in accordance with WHSMP</p> <p>Hazardous and spoil waste disposal records</p> <p>All waste streams disposal to the approved Leigh Creek Mine site</p> <p>Environmental awareness topics delivered to work group SWMS, in toolbox and prestart</p> <ul style="list-style-type: none"> SEF 073 Pre-Audit Environment Assessment (Site

		Contractor with Eyre Advisory Services).	Walk) (2) <ul style="list-style-type: none"> SEF 006 Environmental Aspects and Impacts Assessment (3)
Comply with the requirements of the Aboriginal Heritage Act 1988	<ul style="list-style-type: none"> Protection of all known Aboriginal Heritage sites outside that which is to be directly impacted. Aboriginal Heritage Act 1988 Aboriginal Heritage Regulations 2017 Any relevant cultural, heritage or native considerations which may impact the Project. 	<ul style="list-style-type: none"> DIT Project Requirements (PPR) Brief <p>Note: The Outback Communities Authority (OCA) will provide any reports regarding Planning and local council considerations prior to demolition works commencing. Comply with any heritage approval requirements if an unexpected site is found during deconstruction refer to</p> <ul style="list-style-type: none"> Addendum.2 Addendum 3 Addendum 4 <p>Maintain communication with DIT representatives</p>	DIT clearing permits if required Consultation meeting records Environmental awareness topics delivered to work group SWMS, in toolbox and prestart Records of site inspections/monitoring <ul style="list-style-type: none"> SEF 073 Pre-Audit Environment Assessment (Site Walk) (2) SEF 006 Environmental Aspects and Impacts Assessment (3)
Engage with the affected community, minimise complaints and respond to any complaints within an agreed timeframe.	<ul style="list-style-type: none"> Record and respond to complaints within the timeframe specified in the PPR brief and bridging documents 	Disseminate regular project updates and other information through the project communications	Keep the local community informed of project works as they progress <ul style="list-style-type: none"> close out community questions complaints within 48hrs
Ensure all environmental management measures are effectively implemented	<ul style="list-style-type: none"> Nil non-conformances in relation to implementation of the CEMP and sub-plans 	Capture lessons learnt and ensure any lessons learned are disseminated from environmental incidents/non-conformances to minimise repeat or reoccurrences	Results of external and internal audits and site Inspections Environmental awareness topics delivered to work group in toolbox sessions Audits, management reviews

2.5. Legal and Other Requirements

Delta Legal & Compliance requirements are maintained through the Workplace Safety Australia is a leading national Australian health, safety and environment legal compliance and OHS provider to Delta Group.

- <https://www.worksafe.com.au/online/index.php?ds=1>
- https://www.worksafe.com.au/online/index.php?ds=1&enviro_con=1

Access will be available to Project personnel via the internal BMS. The Project Director or delegate will notify all Delta personnel about new, changed, and revised requirements and communicate to our personnel at pre starts, toolbox meetings and general notice boards.

There are a range of State and Federal environmental laws, regulations and standards that are relevant to Delta's operations. Some of the key legislation relating to our operations include, but are not limited to:

State

- Environment Protection Act 1993 (EP Act).
- Environment Protection Regulations 2009
- Native Vegetation (Prescribed Areas) Variation Regulations 2021

The following list of legislation, standards, policies, and guidelines have been considered and are relevant to this CEMP and should be referred to for further detail:

- Aboriginal Heritage Act 1988
- Aboriginal Heritage Regulations 2017
- Work Health and Safety Act 2012

- Work Health and Safety Regulation 2012
- Dangerous Substances Act 1979
- Heritage Places Act 1993
- Biological Control Act 1986
- Local Nuisance and Litter Control Act 2016
- Relevant DIT Master Specifications
- AS 2601-2001 Demolition of Structures.
- AS 3000:2018 (Including Amendment 1 & 2) - Australian / New Zealand Wiring Rules
- AS 3012:2003 – Electrical Installations Construction and Demolition Sites
- NCOP
 - Safework SA “How to Manage and Control Asbestos in the Workplace” June 2020
 - Safework SA “How to Safely Remove Asbestos: Code of Practice” June 2020

This list is not exhaustive and may be amended as required.

3. Environment Risk Management

3.1. Planning

The CEMP identifies environmental hazards and risks, it details the control measures to be implemented to regulate these hazards. The risk management process involves the use of policies, procedures, audits, forms, checklists, education, supervision, and continual improvement in all aspects of environmental management.

a. Resources

The resources essential to the implementation of the Delta Group environmental policy and the achievement of environmental objectives and targets are defined in the Environmental Management System and made available in its development and implementation in accordance with AS/NZS ISO 14001 clauses 4.4.1 and A.4.1.

b. Overview Of Legal Requirements (Procedure 19)

Delta Group applies the relevant state or territory legislation to the work location. Delta Group will maintain legal and other compliance as a minimum standard. We acknowledge the need to identify and understand the importance of addressing the regulatory and other requirements applicable to environmental aspects of our activities, products, and services in accordance with ISO 14001 clauses 4.3.2 and A.3.2.

3.2. Management Systems

Delta Group:

- Maintains an up-to-date version of this CEMP
- Retains all obsolete pages of the Plan
- Ensures the scope of works is referenced in the Project Management Plan and other sub plans
- Provides a copy of the current version of the Plan to the Client
- Reviews the Plan on an as needs basis to maintain its currency
- Ensures all amendments to the Plan are communicated to persons involved in the works
- All our people are involved in continuously improving our Environmental Management System, particularly in how the system meets the needs and expectations of our clients.

3.3. Management Systems Reviews

Delta Group Management will conduct regular inspections of the work activities and work environment to monitor the effectiveness of this CEMP. A record of all inspections / audits and toolbox talks used in communicating and reviewing it will be retained on-site.

Should it be necessary to expand or modify the environmental management system, any alterations shall be duly reviewed and communicated to persons involved in the works. The scope of the management review includes the effectiveness of the Environmental Management System, and the stability of the system in adapting to client and business needs and its compliance with the Environmental Standard and the Environmental Management System objectives. Delta Group will consider and assess which aspects of our activities, products and services involve an interaction with the environment, and

identify the risks and opportunities involved, and the resulting significant impacts in accordance with ISO 14001 clauses 4.3.1 and A.3.1.

This is an ongoing review process that identifies and assesses past, present, and potential future impacts. The review includes revisiting existing environmental management assessments and procedures. An important part of the review is for the organisation to identify the legislation and regulations affecting the environmental aspects of its activities, products and services, and the related risks and opportunities involved.

a. Continuous Improvement

As a minimum the continuous improvement process is comprised of audits, self-assessments, lessons-learned, procedure preparation, and training. Continuous improvement is an essential management and environmental management strategy in addressing customer satisfaction, product delivery, compliance, and cost savings. It is the intention of the process that areas of concern are assessed before problems develop, and before they have a significant impact on a project. The project manager will maintain all infrastructures needed to achieve contractual compliance.

To ensure the continuing efficiency and effectiveness of the Management System, all members of staff have a responsibility to observe and report occasions where the organisation does not meet its specified requirements, be they imposed by customers, by regulation or nominated in the Management System

3.4. Environmental Aspects and Impacts Assessment

This procedure aims to allow environmental aspects and impacts to be identified and then assessed to determine which ones are significant. The Project Manager shall ensure that all environmental aspects and impacts are satisfactorily assessed, controlled, and monitored. (SEF 006)

a. Identification of Environmental Aspects

Environmental Aspects are the cause of impacts to the environment.

The Project Manager shall assess any activity which will cause an impact (either positive or negative) to the environment. This will include aspects from workshops, maintenance facilities, onsite construction, and office. When identifying aspects, consideration should be given to potential emergency situations, normal and abnormal operating conditions.

b. Identifying Impacts

Environmental Impacts are the consequences arising from environmental aspects. It is possible that from one aspect there may be several impacts on the environment. Impacts to all segments of the environment should be considered including positive impacts. (SEF 006)

3.5. Risk Register (SEF 068)

Delta has established, documented, and will maintain hazard identification and risk management processes, which include environmental considerations, for the duration of the contract.

The objective of these processes is to ensure that services provided under the Contract are conducted without unacceptable risk to personnel and the environment.

Delta operations and activities, by their nature, have the potential to impact upon one or more aspects of the natural or social environment. Delta has a Risk Management Policy and Risk Management Framework which outlines how it identifies, assesses, and controls risks, including environment risks.

Delta has four risk assessment levels:

- Strategic level.
- Operational level.
- Project level; and
- Task/Activity level.

3.6. HIRAC Project Wide Risk Assessment

SEF 043C is designed as a demolition project pre-commencement, and project wide risk assessment tool which must reasonably address all foreseeable tasks associated to the forthcoming work.

The HIRAC must be reviewed (and revised if necessary) whenever high-risk construction work changes or if there is a reason to believe that risk control measures are not adequate. The HIRAC review must not exceed 6 months. This document will direct task personnel to the relevant SWMS. The project wide risk assessment (SEF 043C or D) must remain onsite for the duration of the project as Audits will be conducted to confirm compliance.

The Risk Assessment must consider the use of plant to identify, assess and control mobile plant hazards to be implemented within the Project for the identification of hazards, and for the assessment and control of health and safety risks. It outlines methods for these hazard management activities and sets minimum performance standards for Delta employees and our subcontractors.

The pre-start project must be risk assessed using SEF043C or D, tasks are to be risk assessed using the Risk Priority Likelihood and Consequence Table and the hierarchy of control. The risk assessment process is the legislated requirement to develop safety documents in which counter measures are identified by job step. I.e. SWMS. Legislation requires the employer to provide and maintain for employees a working environment that is safe and without risk to health. Risk Management Standard ISO 31000.

Risk assessment is the process of evaluating risks to workers' safety and health from workplace hazards. It is a systematic examination of all aspects of work that considers:

- what could cause injury or harm
- whether the hazards could be eliminated and, if not,
- what preventive or protective measures are, or should be, in place to control the risks.

A risk assessment ensures continual improvement whereby project management and designated individuals accept accountability for personnel skills and adequate resources to check controls, monitor risks, improve controls by ongoing risks assessing and communicating effectively about risks. Monitoring and review of risk controls is required to provide adequate data in the continual improvement of our risk management system, and it is an integral part of our organization's processes.

The Delta risk management process is a robust system and has been developed, implemented, and maintained as part of our Delta ISO 14001 Environmental certification.

3.7. Standard Work Procedures

Delta PST shall utilise existing Standard Work Procedures (SWP) for routine activities within their work scope whereby, environmental Risks and Controls are incorporated into the SWP. Details regarding SWP and further guidance is provided in the Delta WWHSMP project document.

4. Delta Roles and Responsibilities

A broad outline of the responsibilities of key Delta Project personnel for Project environmental responsibilities for specific roles and responsibilities are outlined below.

The key Delta environmental management roles and responsibilities for the construction phase of the Project are described below:

4.1. Project Director (PD)

Project Director will have overall responsibility for the project. The role is a true leadership role, generally operating at a strategic and tactical level. This role is expected to understand the broader context of the organisation, the many changes being undertaken beyond the program and the direct operational area, and align the project approach, impact, and timing with the broader environment.

This role generally is undertaken by an experienced project leader with implementation experience who provides advisory services to the client management team in relation to the project approach and integration with broader activities. The PD will provide leadership, direction, guidance and coaching to the Project Manager and the broader project team in relation to project approach, activities, risks, issues, and general management to ensure that work is completed on time and within budget, to a high standard. The role will manage upwards strategically to facilitate effective executive and Project governance.

4.2. Project Manager

The environmental responsibilities include:

- Plan deconstruction works in a manner that avoids or minimises impact to environment
- Ensure the requirements of this CEMP are fully implemented
- Ensure construction personnel manage construction works in accordance with statutory and approval requirements
- Ensure environmental management procedures and protection measures are implemented
- Ensure all Project personnel attend an induction prior to commencing works
- Liaise with DIT Environmental Representative and other government authorities as required
- Direct that works be stopped immediately where there is an actual or potential risk of harm to the environment

4.3. Project Engineer

The environmental responsibilities include:

- Provide input into the preparation of environmental planning documents as required
- Ensure instructions and information relating to project environmental risks are provided to staff
- Ensure that the works are carried out in accordance with the requirements of the CEMP and supporting documentation, including the implementation of all environmental controls
- Identify environmental risks and communicate them to the Project Manager
- Identify resource needs for implementation of CEMP requirements and related documents
- Ensure that environment related complaints are investigated to ensure effective resolution
- Act in the event of an environmental incident or potential environmental incident and allocate the required resources to minimise environmental impact
- Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Project Manager

4.4. Project Supervisors

The environmental responsibilities include but are not limited to:

- Ensure that this CEMP & WHSMP and procedural requirements, in line with PPR Brief site environmental requirements are adhered to
- Undertake environmental duties as defined by the Project Manager or Project/Site engineers
- Control field works and implement/maintain effective environmental controls
- Where required, undertake environmental risk assessment of works prior to commencement
- Ensure that Project personnel actively participate in, and promote HSE programs and risk management and mitigation activities for the duration of the Project, through the implementation of the (HIRAC)
- Ensure site activities comply with CEMP and relevant records are kept
- Ensure all site workers are site inducted prior to commencement of works
- Attend to any spills or environmental incidents that may occur on site
- Immediately report to the PM any activity that has resulted, or has the potential to result, in an environmental incident
- Stop activities where there is an actual or potential risk of harm to the environment and advise the PM, Project Engineer and HSE Advisor.
- Seek the assistance of the local Leigh Creek emergency services in reducing environmental impacts of their activities.

4.5. HSE Advisors

The environmental responsibilities include but are not limited to:

- Provide support to Project Site Team (PST) in all aspects of safety, occupational & environmental issues
- Support the HSE Regional Manager in ensuring HSE compliance on site and perform regular HSE audits in the areas of our activities and or operations
- Support the Project Site Team (PST) with planning, coordinating, and implementing of effective HSE policies, guidelines, and procedures to ensure that the project environmental objectives are met
- Monitor compliance by Project personnel to legislative, Delta WWHSMP and DIT requirements
- Provide advice to the PST & site supervisor and or LH's on HSE requirements
- Contribute and coordinate with personnel to actively participate in, and promote HSE programs and risk management and mitigation activities for the duration of the Project, through the implementation of the (HIRAC)
- Conduct on-site inductions for Project personnel to ensure that they understand their required commitment and responsibilities for the Project
- Assist with and prepare/distribute weekly toolbox material and assist with meeting presentations
- Attend scheduled HSE meetings as required
- Liaise with safety personnel regarding HSE issues

- Assist with the coordination of emergency responses exercises and drills, in consultation with local Leigh Creek Authorities
- Maintain all HSE compliance registers and records for the Project
- Assist with the investigation as directed of all incidents in conjunction with the PST & site supervisor
- Assist in the evaluation of auditing and incident investigation procedures
- Close out of all accident investigation reports and prepare/submit lessons learned to the HSE Regional Manager for promulgation to management
- Track and provide regular HSE performance reporting to the HSE department
- Assist in the development of Project specific HSE procedures
- Monitor HSE performance against set Project objectives, targets, and compile KPI statistics and reports
- Coordinate any injury management requirements for Project personnel on site
- Develop, manage, and maintain the Delta Project training matrix
- Coordinate HSE training requirements and competency verification requirements for the Project
- Support PST and personnel in the development of work site HSE campaigns and good practices

4.6. Delta Project Personnel / Subcontractors

The environmental responsibilities include but are not limited to

- Comply with the relevant requirements of the CEMP & WWHSMP and other environmental documentation
- Participate in the project/site induction program
- Actively participate in, and promote HSE programs and risk management activities in line with the CEMP and WWHSMP objectives
- Participate in emergency response drills
- Ensure that all Project environmental procedures and requirements are adhered to
- Report any environmental incidents to the Supervisors and or HSE Advisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident
- Undertake remedial action as required to ensure environmental controls are maintained in good working order
- Stop activities where there is an actual or potential risk of harm to the environment and advise the Construction Manager, Project Engineer, Supervisors and or HSE Advisor
- Demonstrate an understanding of this CEMP and an awareness of relevant environmental legislation
- Indicate a commitment to provide services and materials that minimise impact to the environment.
- Supervise and train their personnel in order to meet the requirements of this CEMP.
- Implement the requirements of this CEMP relative to their work scope.
- Seek the assistance of the local Leigh Creek emergency services in reducing environmental impacts of their activities.
- Provision of accurate and timely monthly environmental reports to the DIT & PST.
- Report and investigate all environmental incidents.
- Undertake corrective/preventive action as a result of findings of incidents, audits, inspections, and management reviews and seek to close out corrective/preventive actions in accordance with agreed timeframes

Delta have developed statements of responsibility for each of the following roles and can be further identified and are located within Delta WHSMP project document no (insert) and must be reviewed and signed at the site-specific induction stage with hard copies remaining on site.

5. Environmental Training and Induction

5.1. Training and Inductions

All Delta personnel (and subcontractors) will undergo general environmental awareness training & inductions in line with their responsibilities in accordance with this CEMP and sub-plans.

Delta will ensure all site training & inductions requirements for Delta personnel on site are inducted as set out in the contract during pre-mobilisation addressing all the Training Requirements and any site-specific inductions prior to commencing work on the Project site.

Induction training is oriented in assisting personnel to be aware of their environmental system responsibilities to ensure that an environmental product or service is delivered and that an appropriate communication and reporting system is maintained to allow verification of all facets of work produced. Records of induction and training sessions are recorded and can be reviewed by the client's Environmental Manager on request

Delta will maintain a training matrix for Employees and subcontractors. Environmental training relevant to the scope of work will be updated regularly within the Delta site specific Training Matrix Register is kept on site.

Environmental issues will form a regular part of daily pre starts and toolbox meetings (to be attended by Delta personnel and subcontractors) to ensure all workers are aware of the key issues. Opportunities will also be made available for selected personnel to attend any training and competency courses where applicable and available.

6. Documentation and Document Control

The document control decisions made by the PST for making changes to the CEMP and other project specific documents will be documented in accordance Delt- Document Control & Records Management Procedure.

The document review process will occur on a regular basis and will be amended and updated following PST review for any revision changes, included to identify changes and current revision status of documents, relevant versions are available at points of use. And documents remain legible and identifiable. Systems are in place to prevent unintended use of obsolete documents.

Approved Forms, Process Flowcharts, Registers, and/or other documents referenced within the body of, or those that are associated with this plan, are accessible and made available for all Delta personnel via the project SharePoint and STEMS systems.

A document register and distribution list will be developed and maintained on site by the PA to identify the current revision of documents or data.

7. Communication and Consultation

All Employees, and sub-contractors working on the Project must comply with the Delta consultation, communication, and reporting Procedure, for engaging and communicating with stakeholders during the construction phase.

Employees are consulted, results communicated, and reports made on any issues (positive & negative) that impacts Safety, Environment or Quality processes of Delta Group functions to communicate information to and from employees – site to management, management to site and development implementation and review of policies and procedures to identify hazards and assess and control risks where any changes that affect workplace OHSE.

7.1. Internal Communications

7.1.1. Operation

The key to successfully reducing environmental impact from daily port operations is proper implementation of environmental management procedures. To ensure effective implementation, Delta will:

- communicate relevant aspects of Deltas CEMP to all Employees and contractors on site
- train relevant personnel on their implementation responsibilities.
- make environmental considerations an integral part of the CEMP's decision-making process (including development and expansion).
- regularly inspect, review and audit operations to ensure environmental procedures are implemented and being complied with

Delta environmental notice boards will be established to inform personnel of relevant environmental information such as the Delta environmental policy, minutes of meetings, results of monitoring, performance standards, environmental incident alerts and Company environmental notices. The notice boards will be refreshed periodically and or as it as it becomes available on site.

Delta Project personnel are required to discuss environmental issues as a regular component of their weekly toolbox and site meetings and consider environmental risks and controls as part of SWMS.

7.1.2. Operational Control

Delta will ensure it complies with the environmental risks associated with its activities under its direct control at the Leigh Creek site through a variety of controls including, but not limited to:

- Site Inductions – this is undertaken by all Employees, contractors and port users who require access to the site
- Delta's inspection and audit program.

- SOP's and 'SWMS's which outline specific environmental controls or guidelines specific to the activity being undertaken.
- Permit to work system.
- Various Management Plans connected to this plan
- Emergency response plans and equipment.
- Maintenance plans and schedules.

All communication documents regard health and safety issues are to be created using the appropriate templates and are to be recorded in the site folder for future reference. Workplace Health and Safety roles, responsibilities, authorities, and accountabilities are communicated to employees during induction, via email broadcast, information sheet or training session as required

The result of various communications will be recorded in meeting minutes or will be contained within reports. A summary of environmental awareness communications for the project can be further referenced within the below table:

Delta awareness communications summary

COMMUNICATION	FORMAT	RECORDS	FREQUENCY	WHO
Environmental Alerts	Poster	Noticeboard	As Required	Delta PST
HSEQ Awareness	Poster	Noticeboard	As Required	Delta PST
Incident Reports	Report	Circulated	As Required	Delta PST
Environmental Site Inspections / actions	Report	Circulated	As required	Delta PST
Environmental Training Programs	Presentation	Assessment	As Required	Delta PST
Pre-start Meetings	Meeting	Attendance	Daily	Delta PST
Delta Toolbox Meetings	Meeting	Minutes	Weekly	Delta PST
Weekly HSE Meetings	Meeting	Minutes	Weekly	Delta PST
Monthly HSE meetings	Presentation	Circulated	Monthly	Delta PST
Site Progress Meetings	Presentation	Minutes	As Required	Delta PST

7.2. External Communications

All community complaints received by Delta personnel must be directed to DIT representative immediately for action. Community Complaints will be recorded using the Delta incident report forms.

Delta personnel, subcontractors and visitors shall not:

- Take photos and post them or post any other Project information to social media or any external forums whether online or in other formats.
- Communicate with the media, government or any other external agencies regarding the site or the Project.
- Report, post or discuss in any online format incidents that may have occurred on site – incidents will be reported, managed, and investigated in accordance our HSEQMS requirements.

8. Management of Change

Advice of design changes that may have an impact on the Delta personnel and or project scope or design must be provided to the Delta PM by the client as soon as possible. Any work being carried out at the time of the design change must stop so that existing RAs, SWMS and or JSEA's for the effected work scope can be re-evaluated where new or changes to scope design, plant, planning, hazards are involved in the change. The PM and crew must resign the SWMS/JSEA, and it may be audited by the for compliance and relevance.

Delta employees shall always conduct their scope of work in the manner and methodology in which it was planned to occur. Where the planned work is commenced and during this work, a significant change occurs in the manner or methodology then the work shall stop.

Re-assessment of the conditions and scope must occur, and risks must be assessed based on the WHS importance and must be documented and communicated. PM in charge of the work must attend the work site and discuss all changes, risk and hazards with the work crew and sign off the SWMS/JSEA before any further work is done. Information is communicated and provided in induction to assist personnel in identifying changes and the need to revise work plans.

9. Emergency Response

Delta shall ensure that the management of incidents and emergencies at the Leigh Creek site is conducted in accordance with PPR Brief and emergency management process and that emergency response resource and interfaces are established commensurate with assessed operational risks.

Delta has the following in place in regard to emergency preparedness and response:

- Emergency Response – the initial onsite response which focuses on the preservation of life, the protection of property and environment, and the prevention of escalation.
- Incident Management – the response to an incident by Delta.
- Business Continuity Management (COVID 19)– in the event of an interruption to Deltas services and activities, a business continuity response may be required to assist in returning to business as usual
- Appendix F & G Emergency Contacts List

Delta has an Emergency Management Plan (EMP) that defines the procedures to be followed in the case of any emergency. An incident control system is defined in the EMP, specifying particular roles and responsibilities for key personnel.

Delta Project EMP shall detail the establishment of muster points and the accounting of personnel, and this will be communicated to all site personnel via signage, project notice boards, start-up meetings, toolbox meetings and site inductions. Locations of firefighting equipment, spill response kits and emergency contact details will be formulated and communicated to all personnel attending the Job Start Up Meeting, at Site Specific Inductions.

At least one emergency response drill involving an environmental aspect will be conducted within 3 months of the main construction works commencing on site.

10. Incidents

10.1. Incident Reporting

Delta's processes for managing environmental hazards and incidents are documented in Delta's Hazard and Incident Reporting Procedure. All environmental hazards and incidents are reported and communicated immediately. Information on environmental hazard and incident reports are provided to the workforce via alerts, toolbox talks or the HSE Committee meeting to ensure any lessons learned are disseminated to Employees and other stakeholders where appropriate.

All Delta Project personnel and subcontractors have the responsibility to report hazards and incidents either directly or indirectly through their supervisors. All Incidents will be classified, managed, and reported to the HSEQ department so an action of investigation; corrective action or root cause analysis can take place. An environmental incident can also be a deviation from this CEMP. This means there has been a failure to follow the established process or procedures.

Delta incident reports must be submitted to the client to ensure.

- Ensure that immediate action shall be taken to either eliminate or control further occurrences
- Ensure that investigation into the immediate and secondary causes shall be fresh in the mind on those involved so assumptions cannot be made on how the incident occurred
- Allow the investigation team to commence preliminary investigations into how, when where and why and what caused the incident

10.2. Corrective and Prevention Actions

Corrective actions may be triggered by the CEMP or review or audit process or be environmental non-conformance incident and will include immediate steps taken to control the event, investigation, and development of additional controls to prevent recurrence. Corrective actions will be developed in consultation with client project representative and will be assigned to the appropriate Delta personnel for close out. All corrective actions will be tracked through to completion.

Recommended corrective and preventive actions should be included in the investigation report (or notification for Low consequence rated incidents). Upon review and approval of the investigation report, recommended actions to correct underlying causes and the contributing factors to prevent the incident from occurring again are to be assigned to appropriate persons. Acceptance of the actions and timeframes should be sought from the action owner or appropriate PST personnel. All actions must be completed within the agreed timeframes and evidence of action completion provided to the client representative.

The investigation process should determine the corrective action required to prevent an incident/non-conformance from re occurring. For each non-conformance, a Corrective Action Report (SEF 005) must be completed, up to five non-conformances can be documented on one Corrective Action Report. Corrective actions will be listed in site Action Register (SEF 024) for completion by nominated person within a set timeframe. Nominated person is to provide evidence of the close out of the corrective action item.

If a Corrective Action requires a review/update of Policy, Procedures, the IMS Manager will be immediately notified. The IMS Manager will review report and determine appropriate action.

The corrective action register is in Delta Project safety HSEQ BMS and tracked through to completion. All incidents are reviewed by HSEQ Department management on a regular basis and all corrective actions are monitored to ensure timely close out and dissemination of lessons learned.

11. Monitoring, Measurement and Reporting

Delta must undertake necessary site inspection and monitoring to demonstrate compliance with project environmental requirements. Performance reporting will be applied to produce systematic, comprehensive, and informative reports on the results of environmental monitoring and the construction activities of the Project as a whole.

Delta shall report project performance to the client in weekly progress reports. Monitoring will occur on a daily, weekly, and monthly basis to ensure compliance obligations are being met for the Project, to measure the effectiveness of environmental controls basis to ensure compliance obligations are being met, including regulatory requirements, project license requirements, contractual requirements, and compliance with the requirements of this CEMP.

The monitoring requirements for required aspects during various stages of deconstruction for each environmental impact are included in the relevant management sub-plans, Objectives and Targets discussed in this CEMP.

Delta Group will implement the following monitoring processes on this project:

- ITP's
- Site Inspections
- Internal Audits
- Corrective Action/s and Close Out
- Calibration of equipment
- Document Control
- Informal checks by Site Foreman/Supervisor
- Product delivery

Delta PST will ensure our compliance with roles and responsibilities for monitoring and measuring of performance in accordance with this CEMP. The PST will ensure QA/QC monitoring, testing, and validation reporting to verify that the works have been completed in accordance with the contract and technical specifications.

Records of inspection and monitoring data must be kept and provided to the DIT at the specified frequency or on request.

All instruments, equipment and measuring devices used for measuring or monitoring must be calibrated, appropriately operated, and maintained in accordance with the manufacturer's specifications. Records of calibration must be made available on request.

11.1.1. General site monitoring

In addition to formal environmental monitoring, the following general site monitoring will be undertaken.

- Daily – Delta will conduct inspections (including all subcontractor activities), and issues will be noted. These inspections are informal visual inspections in order to check compliance with this CEMP.
- Weekly – Formal site inspections are to be completed by the PM, PST, and Supervisors. Site specific checklists will be developed to check compliance with resource consent and designation conditions and this CEMP. Issues will be noted if they present significant environmental risks (e.g., noisy works, works near waterways, sediment basin maintenance etc).
- Monthly - Delta PM will undertake site visit to confirm the environmental monitoring programmes and work procedures containing environmental controls are being implemented in accordance with the site-specific CEMP, sub-plans, Operational Work Programmes and resource consent and designation conditions. A review of current Risk Register (HIRACT Risk Assessment) will be carried out, updating the register as required.

11.2. Performance and Auditing

Delta Group reviews all quality policies and procedures on an as need basis to determine the effectiveness of the CEMP in addressing quality in the workplace

Delta Group Management will conduct regular inspections of the work activities and work environment applicable to monitor the effectiveness of this Plan. A record of all inspections / audits and toolbox talks used in communicating and reviewing will be retained on-site.

Should it be necessary to expand or modify the safety system, any alterations shall be reviewed and communicated to persons involved in the works. The scope of the management review includes the effectiveness of the Safety System, and the stability of the system in adapting to client and business needs and its compliance with Safety Standards and Safety System objectives.

These audits will focus on site and task specific construction activities for managing any potential deconstruction environmental impacts and high-risk construction activities to ensure all controls and methodologies are being implemented and this CEMP meets these requirements, Delta objectives and targets for the environmental performance of the Project and outlines monitoring processes to check the adequacy of controls as they are implemented during deconstruction.

The frequency of audit activity is determined by the risk to the project, specific daily monitoring, QA/QC, monitoring, testing, and validation reporting to verify that the works have been completed in accordance with the contract and technical specifications, previous audit outcomes and in some cases the results of inspections.

Independent audits are also carried out by the HSEQ Manager in accordance with our procedures and HSEQ internal audit schedule, to ensure the PST are meeting the requirements of the CEMP and our certified ISO 14001 compliance standards.

Audits shall be undertaken as follows:

- Six-monthly system audits of the EMS, environmental approvals, and compliance procedures
- Quarterly on-site CEMP compliance audits
- Audits of key Contractors' environmental management
- Daily and weekly work area inspections.

Where audit finds show environmental management actions not being effective, the audit may recommend changes to procedures. Results of the audits will be reported back to the PST team through a variety of mechanisms including site toolbox meetings, construction meetings and team meetings. Agreed Key Performance Indicators (KPI's) identifying leading and lagging indicators shall be applied and is further detailed within our WHSMP document and shall be monitored by the PST Management Review Process

Approval from the DIT will be required for any relevant revisions of a material nature to the CEMP or sub-plans prior to implementation and where the contract extends beyond 12 months the CEMP review process will be required to be assessed and approved by DIT.

A management review of the CEMP will be undertaken at regularly intervals or as directed by DIT and by the PST. The management review will be organised by the PM. The review will take into consideration:

- Input from the DIT and or delegate
- Site personnel comments
- Audit findings and recommendations)
- Environmental monitoring records
- Environmental complaints, incidents, and emergencies
- Details of corrective and preventative actions
- Environmental non-compliances
- Changes to organisational structure
- Ongoing compliance with objectives, conditions, and targets
- Possible changes in legislation and standards.

The review process will include looking at the environmental controls and procedures to make sure they are still applicable to the activities being carried out. Reasons for making changes to the CEMP will be documented. A copy of the original CEMP document and subsequent versions will be kept for the Project records and marked as obsolete. Each new/updated version of the CEMP documentation will be issued with a version number and date to eliminate obsolete CEMP documentation being used prior to its application and implementation.

12. Environmental Management

The following section describes the environmental aspects associated with Delta activities under the Contract and SOW. The management actions listed form the basis for control required to adequately mitigate environmental risk aspects that apply in the context of this project are also referenced within the CEMP and PPR Brief.

This CEMP identifies all the requirements applicable to manage the activities are described further within this CEMP. It also provides the overall framework for the system and procedures to be followed to ensure environmental impacts are minimised and legislative and other requirements are fulfilled. The strategies defined in this CEMP have been developed with consideration of the PPR Brief requirements and is consistent with the CEMP.

We are committed to controlling the impacts of our operations on the environment and protecting it by safeguarding existing land, water, air, the surrounding ecology, and community.

Delta Group's scope of operations includes project management and supervision, site assessment, remediation/treatment, heavy earth moving equipment operation, civil and building demolition works, removal of prescribed waste and asbestos management

12.1. Approvals and Permits

Delta issued internal permits shall be obtained by Delta for works including, but not limited to:

- Excavation Permits
- Clearance Permits (Local)
- Environmental Permit to Work

12.2. Exclusion Areas – Environmental

Environmental exclusion areas will be noted on Permits and will be demarcated in the field with bunting.

12.3. Exclusion Areas – Aboriginal Heritage Sites

Identified Aboriginal Heritage Sites will be demarcated with striped flagging. These sites will also be demarcated by star pickets placed at intervals not exceeding 10 meters.

12.4. Environmental Control Measures / Erosion and Sediment Controls (AUD 005)

Erosion and sediment will be managed in accordance with sound environmental practices to prevent sediment laden water from entering any drainage or natural waterway.

a. Placement And Management of Stockpiles

Placement of stockpiles will take into consideration proximity to drainage lines/waterways and other nearby sensitive receivers (e.g., schools, residents). Stockpiles will be managed to limit erosion and runoff. Should they need to be on site for longer than 28 days, a higher level of erosion and sedimentation control may be required.

b. Management Of Batters

Any batters which are created will be cut at a minimum angle as to reduce the risk of slope failure and erosion. Where necessary control devices will be used to stabilise and control any erosion or sediment created from the construction of batters.

c. Sediment Traps

Sediment traps are designed to capture flow from exposed areas and then filter (or allow time to settle) out suspended particles. Consideration should be given to the location, size/capacity and ongoing management, ensuring captured sediment is not allowed to enter a drain or waterway during cleaning/maintenance. Priority must be given to off-line sediment traps (stopping sediment as close to the source as possible – rather than letting it settle once it has entered a drain or waterway).

d. Diversion Drains

Diversion drains can be constructed to divert surface runoff away from amenities/exposed work areas (including stockpiles) to appropriately controlled discharge points.

f. Staging Of Works

Works onsite will be staged to limit the amount of exposed earth. Consideration may also be given to the time of year and short-term weather conditions (e.g., rainfall/high wind).

g. Vehicle No-Go Areas

Areas where construction work is taking place will be blocked off to all vehicles other than deconstruction vehicles using bunting and barriers.

h. Site Entry / Exit Points

The site entry / exit point(s) need to be kept free of dirt. This is achieved by planning how the vehicles will move around the site and trying to keep them on hardstand/defined haulage routes. Sometimes, despite best efforts on site, some dirt may get tracked onto the road. A street sweeper can be utilized to clean the areas affected. Roads should not be washed unless they have become a safety hazard. If a water cart is used, the storm water drains must be protected, and a street sweeper used in conjunction to pick up as much of the sediment as possible.

J. Protection Of Stormwater Drains

Silt socks, sandbags and/or sand filled booms can be used to prevent any sediment from being discharged into stormwater drains should wet weather be forecasted for the project site.

12.5. Import And Export of Fill Material

a. Imported Fill

Fill imported to site must be demonstrated to meet EPA IWRG 621 Fill Material criteria. The exception to this is quarry product where a receipt demonstrating the origin of the material will generally suffice (no history of prior contaminating land uses, and it is a virgin natural product).

b. Offsite Soil Disposal

Soil that requires offsite disposal must be classified in accordance with EPA IWRG 621. Other considerations include the presence of solid inert material and the additional handling and disposal requirements if asbestos is identified in the soil.

c. Onsite Reuse of Soil

Internal movement and re-use of soil within the site boundary will be assessed against the National Environment Protection Measure Health and Ecological Screening Levels (updated 2013). Some sites may be subject to Statutory Audit and the environmental assessor will determine and advise how soil must be managed at the site.

12.6. Noise and Vibration

Noise and vibration emissions will occur during deconstruction due to the operation of earthmoving and deconstruction equipment activities.

Throughout the construction phase, noise effects must be carefully managed using noise mitigation methods as set out in this CEMP will remain consistent with the Noise Objectives (associated with construction noise) as detailed within the CEMP Table 2.

Monitoring and testing of these conditions shall be done on an as needed basis or when the likelihood of excessive noise or vibration is identified when RAs carried out for upcoming work identify the need for it to be carried out and when the implementation of testing is a statutory requirement.

State and Local Authority requirements must be adhered to in relation to noise levels, vibration and working hours, to ensure that nearby sensitive receivers are not unreasonably disturbed.

a. Application of noise/vibration reduction measures

Machine noise will be unavoidable during earthworks. However, Delta Group will aim to keep noise and vibration to a minimum and only work within the specified hours of work. Where vibration is problematic, construction methodology and machinery settings will be altered to eliminate or lower vibration generation.

b. Selection of machinery

Only machinery appropriate for works being undertaken will be used throughout the duration of the project. Any other machinery which could be deemed noisy will be used to a minimum and at designated times during the day.

c. Restriction of hours of operations

No noise generating activities will occur outside the normal working hours unless approval has been given by Superintendent and/or Council. Furthermore, the following conditions apply:

- As part of the noise mitigation treatment for the project, all trucks and machinery will be checked for defective exhaust systems and general servicing.
- No works shall be conducted outside of normal working hours unless the client representative has given written approval to do so.

d. Placement of machinery

Machinery will only be working inside the perimeters of the job site unless all relevant applications and permits have been obtained for outside works. Trucks waiting to enter the site will be advised to turn off their motors to prevent noise and emissions from their idle engines.

12.7. Air Quality (Dust and Odour)

a. Dust Control

- Phase work to limit extent of exposed areas.
- Maintain hardstand areas where possible.
- Delineate haul roads and place crushed rock down, where possible to limit dust generation.
- Limit speed on site to reduce dust generation.
- Use water for dust suppression being careful not to generate run off; water can be accessed from fire hydrants located on the southern and eastern boundary of the project site
- Roughen up exposed soil to lower wind velocity at the soil surface
- Assess a higher level of dust mitigation if stockpiles are to remain for longer than 28 days
- Use street sweepers to keep hardstand areas and entry/exit points free of debris if required
- Alter (or temporarily cease) site activities when the above measures are not effective, and dust is visible beyond the site boundary.

12.8. Solid Waste Management

Litter and waste must be contained on site, and then disposed in a responsible manner

a. Prescribed Waste

Prescribed Industrial Wastes (as defined in Environment Protection (Prescribed Waste) Regulations 1998) need to be assessed to determine appropriate disposal options. Prescribed Wastes need to be transported in EPA licensed vehicles, to a facility licensed to accept the category/classification of waste. In addition, each load or consignment needs to be accompanied by completed waste transport certificates. Contact needs to be made with the proposed receiver prior to transport to ensure they can accept the waste under their existing license.

b. Storage Of Fuels and Chemicals

Fuels and chemicals will be stored in accordance with EPA Bunding Guidelines, Dangerous Goods Regulations and Australian Standard 1940. Appropriate spill containment and clean up products will be available on site to use in the event of a spill.

c. Waste Management

Building and demolition waste will be re-used or recycled where possible. Every effort will be made to segregate waste on site to optimize the chance for recycling. The EPA hierarchy of waste will be considered when managing such material on site.

An Early Works package will comprise of ACM removal from the DP1 zone and disposal of all materials at the Leigh Creek mine cell (to be coordinated through Eyre Advisory Service (EAS). Separate Contract Works after this Contract will include the removal or demolition of existing structures and services within the DP1 demolition zone.

All ACM waste including C&D will be transported in licensed heavy vehicles and disposal of all materials will be at the Leigh Creek mine cell (to be coordinated through Eyre Advisory Service (EAS) as the approved landfill facility for all waste.



d. Litter Collection Storage and Removal

Delta Group will ensure there are an adequate number and type of bins on site to manage general litter. Bins will be regularly emptied, and all employees will be encouraged to ensure waste is disposed appropriately. Good housekeeping practices are encouraged to ensure a safe and clean working environment.

e. Waste minimisation and avoidance

Every effort will be made to ensure quantities of material ordered have been accurately calculated to reduce wastage. Where possible, suppliers will be asked to take back excessive packaging. Often there is suitable fill available on other Delta projects to construct piling platforms etc. Use of such material prevents importation of quarry product. This practice is encouraged providing documentation is available on the contamination status of the material.

12.9. Water Management

The runoff and disposal of site water will be managed in accordance with sound environmental practices to prevent sediment laden or any contaminated water from entering any drainage system or waterway.

a. Storm Water Management

- o clean stormwater should be diverted around active work areas to limit the amount of runoff requiring treatment.
- o Works should be phased to limit exposed earth
- o All drainage lines and pits must be identified and protected prior to work being undertaken.
- o Sediment control devices must be designed to accommodate a one-in-two-year storm event (two-year ARI with intensity of six hours) for temporary structures.
- o Sediment control devices must be regularly maintained to ensure effectiveness during a rain event
- o No materials or machinery will be stored in a flood plain
- o Sediment control devices need to be placed as close to the source as possible
- o Preference is always given to offline sediment control devices.

b. Working In Waterways and Flood Plains

Working in and / or around waterways requires a high level of planning. It may be necessary to create a dry working environment by diverting a watercourse around the work site or by working inside a caisson or other similar structure. Routine water monitoring upstream and downstream is required to demonstrate the worksite is not adding an unacceptable level of additional sediment to the water downstream. Attention needs to be given to spill management including having a spill kit on site. No machinery is to be stored in the flood plain and site supervision needs to monitor rainfall within the catchment area to effectively manage the site.

e. Protection Of Groundwater

- o Contaminated soil will not be re-used within the groundwater zone
- o Site spills will be controlled, contained, and cleaned up at the time of the incident
- o Groundwater well installation and decommissioning will be undertaken in accordance with best practice and with appropriate permits.
- o Consideration of how/if the scope of work may impact groundwater recharge areas/flow directions

F. Grey Water Management

Grey water generated from the use of site facilities will be discharged into a stormwater outlet should there be one readily available. Should a stormwater discharge outlet not be present within close proximity to the site amenities, the grey water will be discharged in an approval location.

12.10. Protection of Existing Flora and Fauna

All significant flora and fauna on and adjacent to the site must be protected unless otherwise permitted. Any removal of flora and fauna will be dealt with through the relevant authorities and with the relevant permits.

Any areas identified of high conservation value or special biodiversity significance that may be impacted by on site activities must be identified and evaluated.

12.11. Ground Disturbance and Management

All Project related ground disturbance must be approved, measured, and accurately accounted for in the appropriate form. If any sensitive areas are encountered, then works will be ceased and DIT will be notified immediately. Delta must ensure that

dust and erosion do not impact on the surrounding environment adversely and other sensitive receptors. All personnel will be informed of the requirements at site inductions and including toolbox and prestart meetings.

In respect to Site management Clearing and Disturbance Permits are mandatory.

12.12. Cultural and Heritage Management

Leigh Creek site is defined as having areas of moderate archaeological sensitivity, which need to be considered when performing our works.

Places, sites, and objects of archaeological or heritage significance (can include trees) must be protected at all times. Any contact with historical or cultural features will be dealt with through the relevant authorities and with the relevant permits. Permits remain the responsibility of the client/client's representative.

13. Asbestos Management

Delta shall develop and implement the following environmental management measures:

- Pre-demolition Hazardous Materials Assessment
- Construction Environmental Management Plan
- Asbestos and Hazardous Materials Management Plan

Delta shall engage a suitably qualified and experienced Licenced Asbestos Assessor (LAA) to complete a pre-demolition hazardous materials assessment to all house types and associated structures proposed to be demolished.

Asbestos Management Plan bridging document will resolve interfaces with any contractual WHS requirements, and where applicable in this Plan in the execution of asbestos removal program that will identify hazards and risks that Delta Group business, our personnel, and Subcontractors to be engaged on the Project for the removal of asbestos may be exposed to during work. The plan details the control measures to be implemented to regulate these hazards and risks.

All ACM waste will be transported in licensed heavy vehicles and disposal of all materials will be at the Leigh Creek mine cell (to be coordinated through Eyre Advisory Service (EAS) as the approved landfill facility for all waste.

All demolition works involving the removal and disposal of asbestos must only be undertaken by Aztech Services Australia's (ASA) contractors who hold a current Worksafe SA Asbestos or "Demolition Licence" and a current Worksafe SA Asbestos Licence A or B, prior to works, notification to be submitted to Worksafe SA and removal must be carried out in accordance with National Occupational Health and Safety Commission (NOHSC): "Code of Practice for the Safe Removal of Asbestos". 2011.

All personnel involved in with the asbestos work, either inside or outside the working area, will have completed all training required to handle asbestos related materials. All workers will be and will have been specifically instructed in all relevant aspects of asbestos health hazards, safe working procedures, maintenance and wearing of respiratory protective equipment and protective clothing for the project.

All works will be carried in accordance with the developed Safe Work Method Statement for the task and signed off in agreement and understanding with the information and controls covered in the SWMS

The risk management process involves the use of policies and procedures compliance, forms and checklists, education, training and supervision, and continual improvement in all areas required of quality. The model in AS/NZS 4581 Management System Integration and the guidelines in Standards Australia Handbook Guidance on integrating the requirements of Quality, Environment and Health and Safety Management Systems form the basis for the Delta IMS.

- Procedure 37 Unexpected Finds
- Procedure 24 Monitoring and Measurement
- Procedure 7 Dangerous Goods and Hazardous Substance Management
- SOP 49 Unexpected finds (Asbestos); Asbestos Management Plan

Agon Environmental Pty Ltd (Agon) is the nominated hygienist for the site. All air monitoring results will be made available to all workers on a daily basis. The presence of the Hygienist as required along with the experienced removalists, supervisors and other trained workers will greatly reduce the chance of any asbestos exposure in the workplace. These works will be completed in accordance with the Code of Practice "How to Safely Remove Asbestos" and the various subplans for the project.

Delta's unexpected finds procedure must be always followed – and is applicable to all people onsite. If you encounter material that may be asbestos, you must (that is not already known to be asbestos):

1. STOP WORK

2. NOTIFY YOUR HSR, QSE and FOREMAN IMMEDIATELY
3. ISOLATE THE AREA (KEEP CLEAR OF THE PRODUCT BUT DO NOT LEAVE THE AREA TO MINIMISE ANY POTENTIAL CONTAMINATION)
4. FOLLOW HYGIENEST INSTRUCTION (decontaminate if necessary)
5. MATERIAL WILL BE ASSUMED POSITIVE UNLESS TEST RESULTS PROVE OTHERWISE

14. Hazardous (Chemical) Materials Management

Delta shall be responsible for providing and maintaining spill control and clean-up equipment for its activities on site. Spillages shall be controlled in the first instance and clean-up implemented as soon as possible. All hydrocarbons are to be stored in accordance with AS1940 and IAW Delta Chemical Management Procedure.

Delta and its subcontractors will provide a current (within 5 years of the date of issue) SDS for all products and substances to be used for the work activity. Before a product or substance is used for the work activity, Delta will review the Material Safety Data Sheet (MSDS). All employees involved in the use of products classified as hazardous, are provided with information and training to allow safe completion of the required task. As a minimum standard, all safety and environmental precautions for use listed on the SDS are followed when using the substance and will be included in the Safe Work Method Statement. All products and substances requiring an SDS brought onto the workplace will be documented in the Hazardous Substances Register (SEF 033). The primary source for hazardous substance management is on the Delta intranet.

<https://jr.chemwatch.net/chemwatch.web/home>

14.1. Spill Response

This CEMP details the actions required following a spill. Any spills will be contained within the site boundary, and there will be no discharge of contaminants to the wider receiving environment. It is important that personnel are trained in the management of spills and that the procedures are tested. Spill kits will be available for use at regular locations throughout various locations and placed at each area designated for the storage of hazardous substances. In addition, all foremen will carry a spill response bag in their vehicles to ensure a quick response. An incident form will also be completed for all spills

Emergency Procedure

1. Alert personnel in the immediate area of the spill
2. Notify site foreman to assess situation.
3. Activate alarm if required
4. Call local Leigh Creek SES 08 8675 2468. If emergency cannot be controlled on site, then Site Supervisor to report incident.
5. If safe to do so use spill kit to contain spill protecting drains and waterways were possible.
6. Inform Delta Project Manager
7. Inform DIT Project Manager or Superintendent

All spillages shall be reported to the DIT representative immediately.

15. Waste Management

All waste streams generated from zones DP1 and DP2 will not be allowed to accumulate excessively within the work areas. Asbestos will be placed in appropriate double lined plastic receptacles bins as the work proceeds and will be secured with adhesive tape prior to transport in accordance with EPA guidelines.

All ACM waste including C&D will be transported in licensed heavy vehicles and disposal of all materials will be at the Leigh Creek mine cell (to be coordinated through Eyre Advisory Service (EAS) as the approved landfill facility for all waste.

All C&D and hazardous material waste (asbestos) movements will be planned & agreed to with the Project Manager with all relevant and required logs and statistics kept. All waste material movements to off-site facilities will be documented, with all disposal documentation, manifests and the like provided to the client on a regular basis.

16. Greenhouse Gas Emissions and NGRS Reporting

Excessive smoke and odour from diesel-fuelled trucks, generators and other machinery is primarily caused by poor engine maintenance. Failure to maintain air filters, fuel filters and fuel injectors to manufactures specifications may cause excessive black smoke and objectionable odour.

Excessive smoke and odour discharges from trucks, earth moving machinery and generators, while unlikely, could cause complaints under adverse meteorological conditions if vehicles and machinery are not well maintained. The Delta PST will utilise late model vehicles and machinery where possible and will maintain all machinery and vehicles regularly to prevent

excessive smoke and odour discharges. Delta fleet plant maintenance procedure outlines the requirement for regular maintenance.

17. Fire Management

Fire risk is addressed and will be managed through several Project mechanisms and so management actions are not duplicated in this CEMP. The key Project documents addressing fire risk and management actions include:

- Project Hot Work Permitting Process.
- Project WHSMP
- Project Emergency Response Plan
- Provide portable fire extinguishers in crib rooms, offices, stores, workshops, on mobile plant, vehicles, and other designated equipment, and wherever combustibles or petroleum products are stored or decanted and:
- Provide training and instruction to their personnel
- Maintain firefighting equipment and ensure that a competent person checks fire extinguishers every six months and maintain an inspection register.

In the event that land disturbance (such as clearing a firebreak) is required in order to deal with an emergency situation in areas for which there is no existing Approvals Permit in place, the local Leigh Creek Outback Authority Emergency response must be contacted.

18. Rehabilitation

This CEMP document has been prepared in accordance with the guidelines detailed within the PPR Brief Environmental obligations for the project include compliance with applicable environmental legislation and guidelines; including Environment Protection Agency (EPA) best practice construction management for major construction sites, Delta environmental policies and procedures, and requirements and commitments of the project governance documents, and addresses the rehabilitation commitments provided in the Environmental Referral Documents to ensure environmental and rehabilitation objectives that the CEMP is committed to pursuing.

Scale of land clearing and disturbance for the project construction is detailed in Section 2 of this plan addressing the Key Elements of Scope of Works Document PPR Brief and the criteria is discussed further in this CEMP, with various controls and management measures described for reducing the impact of these potential rehabilitation constraints, as far as practicable.

Rehabilitation efforts are most effective in retaining topsoil viability, reducing dust, restoring vegetation values and fauna habitat areas when undertaken progressively through the deconstruction period. As a result, rehabilitation will be undertaken as soon as deconstruction areas are no longer required for ongoing project or operational activities.

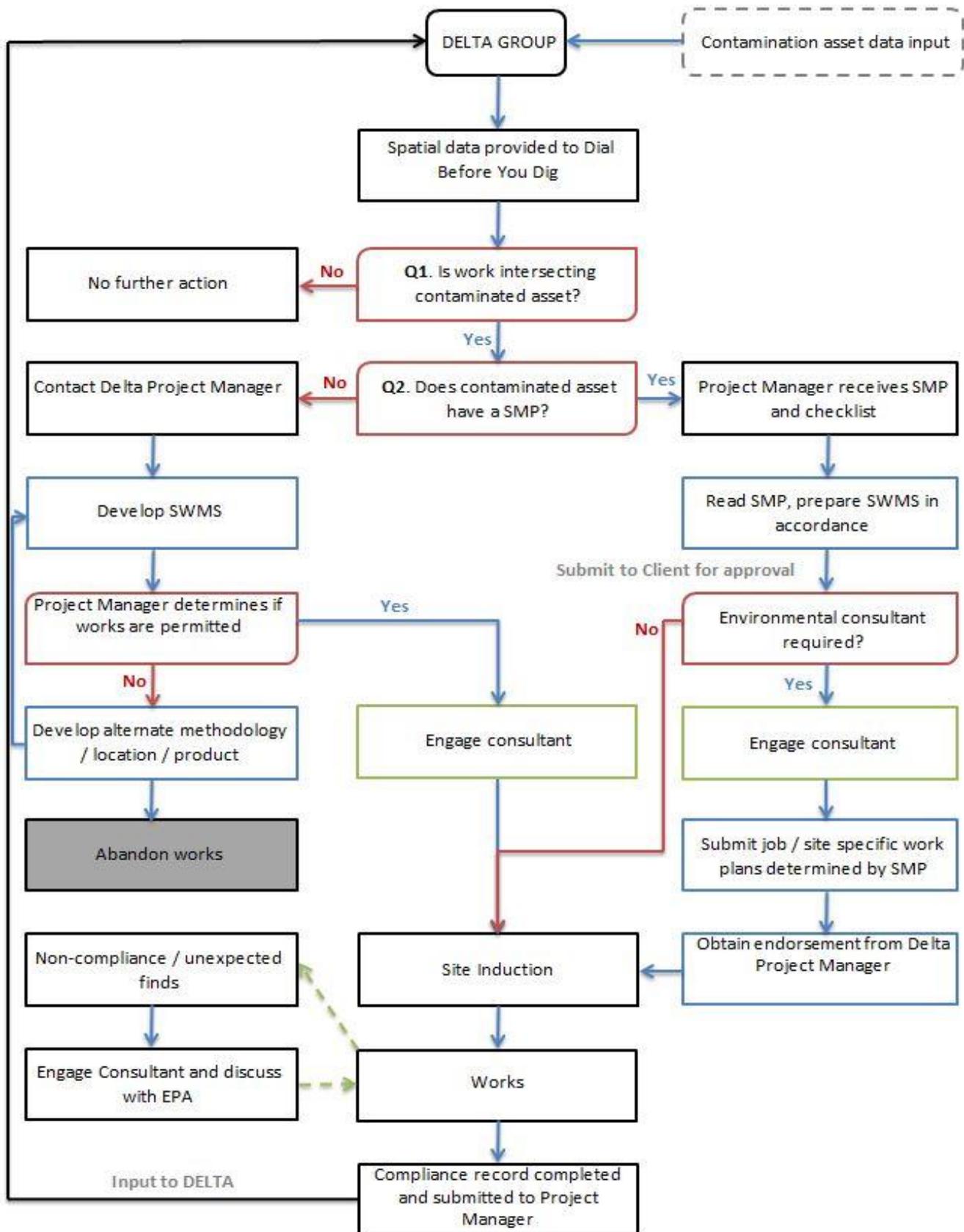
Closure and rehabilitation are planned and considered across all stages of redevelopment and operation, to closure. Decisions made from the start of a project can significantly impact the success of rehabilitation programs and final closure and relinquishment.

The principal environmental objective for the project is to maintain and, where possible, enhance the social, environmental, and economic values and services of the proposal area and surrounds of the Leigh Creek site.

19. Control of Environment Risk (Guide)

The extent of controls and their physical characteristics for the environment is based on the Resource Management Hierarchy (below)





20. Demobilisation and Handover

Handover of the environmental components of the Project to DIT occurs via a formal process. This process includes:

- Ensuring that the Project areas handed over are free from deconstruction related contamination and rehabilitated where required.
- Providing all required environmental records where applicable.

As part of the continuous improvement requirements of HSEQMS, environmental controls implemented during deconstruction of the Leigh Creek Project will be reviewed to capture any lessons learned for improvement on future Projects.

The objectives of the demobilisation and handover controls are to:

- Demobilise the site in an environmentally responsible manner.
- Ensure records and knowledge necessary for the management of environmental risks are handed over to DIT.
- Assess performance for continual improvement purposes.
- Comply with approved licences, permits and legal provisions; and
- Achieve DIT sign-off with a minimum of corrective actions
- Comply with PPR Brief

ENVIRONMENTAL MANAGEMENT POLICY (04)



POLICY STATEMENT

As part of our commitment to achieving the principles of responsible environmental management, sustainability and protection of the natural environment in our worksites, we recognise our legal and moral responsibility to ensure that our activities, products and services are designed to protect and enhance the environment in the communities in which we operate, and our obligations to ensuring that our operations do not place the natural environment or the local community at risk of harm.

AIMS AND OBJECTIVES

We are committed to environmental improvement and prevention of pollution. We will achieve this by working with our customers, suppliers and the community. To achieve these objectives we will –

- develop, implement and maintain a management system that addresses the requirements of ISO 14001;
- reduce waste through innovative work practices and recycling practices;
- minimise environmental impacts by reduction of polluting substances produced by our operations, activities, products or services;
- minimise the impact of our operations on the neighbouring community;
- increase the use of environmentally acceptable materials, equipment and technology in place of those which are considered harmful;
- ensure that our suppliers follow acceptable environmental policies; and
- actively promote environmental awareness among workers, clients, customers and the general public

At Delta Group we recognise that the overall responsibility environmental sustainability rests with management, who will be accountable for the implementation of this policy. These responsibilities include –

- ensuring that all environmental policies and procedures are implemented;
- establishing measurable objectives and targets to ensure continued improvement aimed at the elimination of waste, pollution and environmental harm;
- encouraging consultation and co-operation between management, workers and stakeholders in matters which may affect or impact on the environment; and
- providing adequate resources to meet these environmental commitments.

Workers responsibilities include –

- following all environmental policies and procedures; and
- recognising and reporting hazards which may affect the health and well-being of the environment.

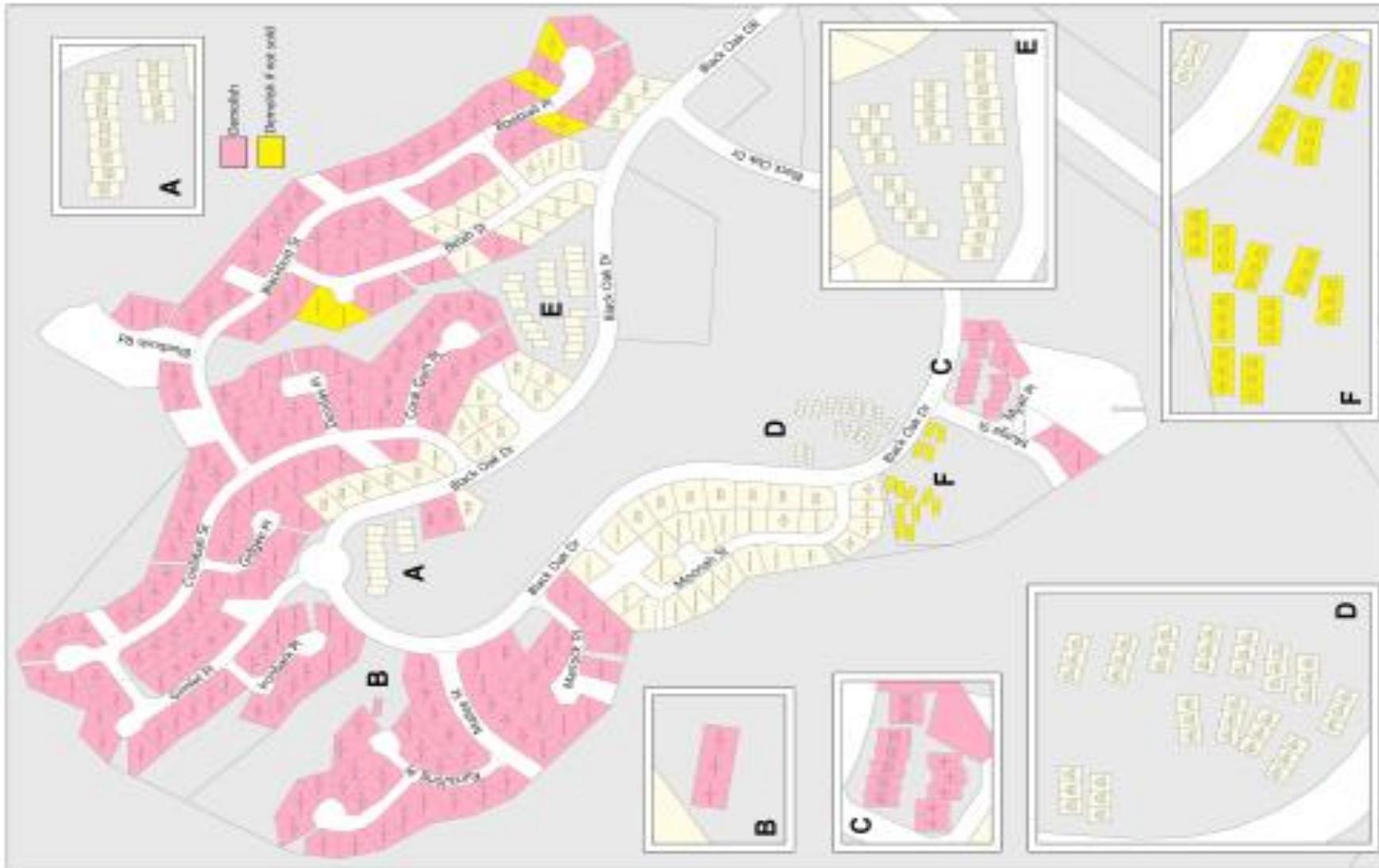
Jason Simcocks
CEO

AUSTRALIA WIDE

Head Office: 577 Plummer Street, Port Melbourne VIC 3207 / Ph: 03 9646 8277 Fax: 03 9646 6877 / delta@deltagroup.com.au

1800 335 824 / DELTAGROUP.COM.AU

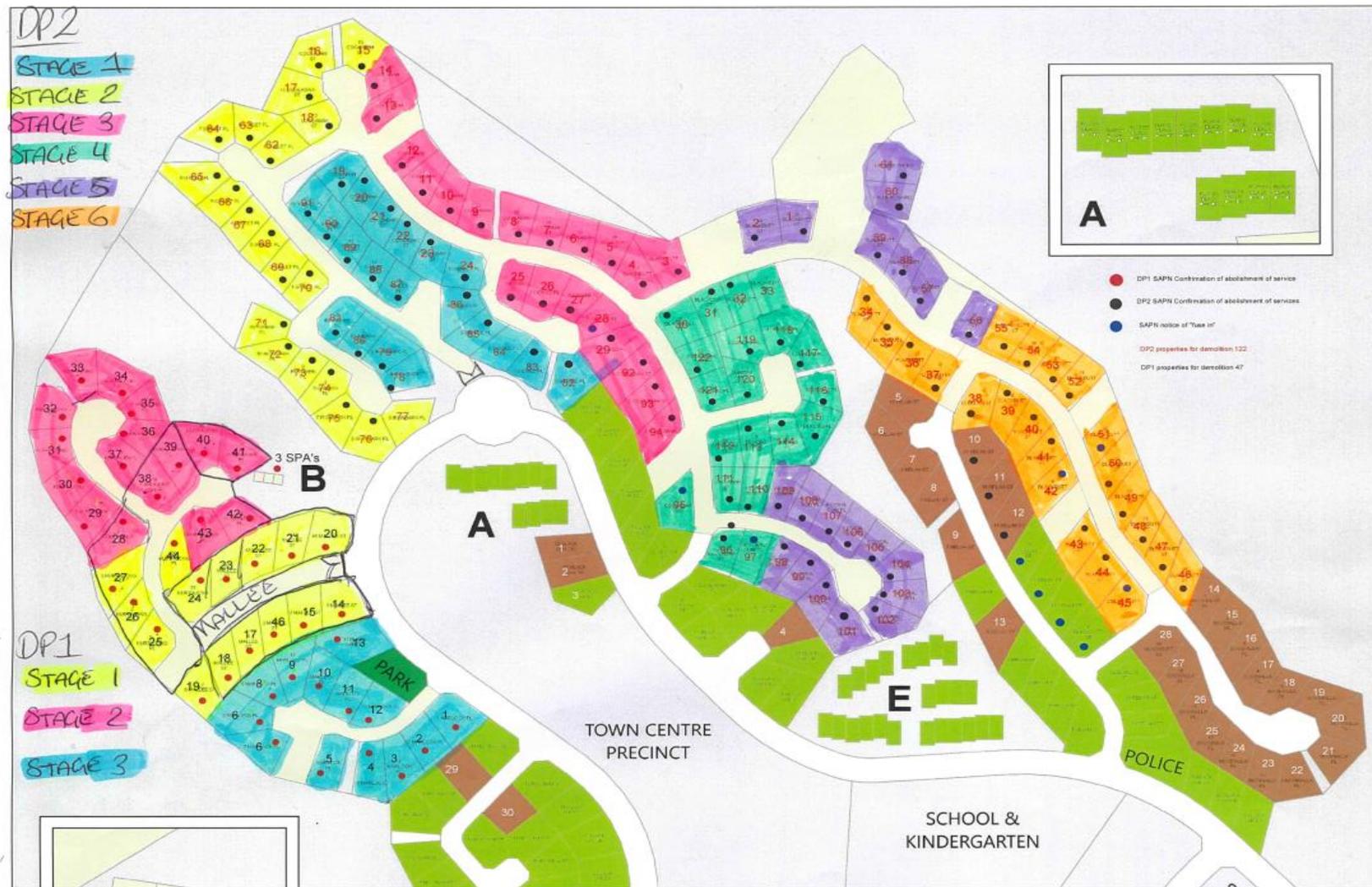




24. Appendix D Demolition DP1 & DP2 Zones



25. Appendix E ACM & Demolition Proposed Sequence of Work



Main Emergency Contact Numbers				
Leigh Creek Medical Centre Emergency Number:			000 / (08) 86786022	
Leigh Creek Local Ambulance Operations			000	
Site Channels				
Delta UHF#			#1	
KEY CONTACTS				
Name	Company	Role	Phone	Email
Elliott Newberg	Delta	State Manager	0412 270 610	elliottn@deltagroup.com.au
Petar Kleut	Delta	Project Director	0429 014 470	petar.kleut@deltagroup.com.au
Harry Pickard	Delta	Project Manager	0429 266 154	harry.pickard@deltagroup.com.au
Adrian Neal	Delta	Supervisor	0437 246 325	Adrian.neal@deltagroup.com.au
James Vari	Delta	Operation Manager	0427 515 113	james.vari@deltagroup.com.au
Steve Young	Delta	Contracts Manager	0400158128	stevey@deltagroup.com.au
Jeff Lancaster	Delta	Project QSE Advisor	0407 050 440	jeff.lancaster@deltagroup.com.au
Mark Muller	DIT	Project Manager	0428 114 559	mark.muller@sa.gov.au
Kyle Hammond	DIT	Project Manager	0421 144 299	Kyle.Hammond@sa.gov.au
Paul Case	Task Force	Chairman		paul.case51 paul.case51@gmail.com
Vicki Beard	DEM	Project Manager	0438 850 059	vicki.beard@sa.gov.au
Tracy Neldner	OCA	Town Manager	0457 200 087	tracy.neldner@sa.gov.au
Kate Jeffery	Aurecon	Manager Program Advisory	0439703 047	kate.jeffery@aurecongroup.com
John Drillis	RLB	Cost Manage		

SITE ADDRESS: Leigh Creek Township South Australia

26.1. Appendix G Site Communications:

CONTACT	NAME / LOCATION	TELEPHONE
ELECTRICITY	SA Power Network	131261
GAS	Epic Energy Origin Energy LPG	TBC
Office for the Outback Communities Authority	Tracy Neldner	(08) 8675 2126
Leigh Creek Medical Centre	Leigh Creek	(08) 86786022
Emergency Department Service Hawker	EDS	08 8648 4007
Emergency Department Service Port Augusta,	EDS	08 8668 7500
Leigh Creek Police Station	Police	(08) 8675 2004
POISONS INFORMATION CENTRE	Poison Hotline	13 11 26
WORKCOVER/WORKSAFE	Worksafe SA	1300 365 255
Leigh Creek SES Unit	SES	08 8675 2468
SA Country Fire Service Station	Fire	000
STATE EMERGENCY SERVICE (SES)	SES	08 8234 6100
Royal Flying Doctor Service	RFD	08 8238 3333
WATER SEWERAGE, DRAINAGE FAULTS	SA Water	1300 729 283
ENVIRONMENTAL PROTECTION AUTHORITY (EPA)	EPA SA	1800 623 445
TELSTRA EMERGENCY NUMBER	TELSTRA	13 22 00
CULTURAL/HERITAGE DISCOVERY & INCIDENTS	Senior Cultural Heritage Officer of DOSAA	08 8226 8930
DELTA HEAD OFFICE	33 Port Road Thebarton	08 8351 3620