**ENVIRONMENTAL MANAGEMENT PLAN** 

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No: **C2448** 

Rev: **E** 

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# ENVIRONMENTAL MANAGEMENT PLAN

PROJECT C2448 CBOP FLAT ROCKS
WINDFARM

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# 1 ACRONYMS

BMP: Bushfire Management Plan

**CBOP**: Civil Balance of Plant

**CRAW**: Construction Risk Assessment Workshop

**DFES**: Department of Fire and Emergency Services

**DPaW**: Department of Parks and Wildlife.

EGP: Enel Green Power

EMP: Environmental Management Plan

**EPA**: Environmental Protection Agency

**EPBC**: Environmental protection and Biodiversity Act

HIRAC: Hazard Identification, Risk Assessment and Control

**HSE**: Health, Safety and Environment

HSEQ: Health, Safety, Environment and Quality

JSA: Job Safety Alaisys

MRWA: Main Roads Wester Australia

**OSHE**: Ocuppational Safety Health Environmental

**PPE**: Personal protective equipment

**SDS**: Safety Data Sheet

**SWMS**: Safe Work Method Statement

TFB: Total Fire Ban

WFC: Westforce Construction

WMP: Water Monitoring Point

WTG: Wind Turbine Generator

#### 2 INTRODUCTION

Westforce Construction has developed this Environmental Management Plan (EMP) to provide direction and guidance for the management, employees and subcontractors in understanding and achieving the environmental expectations and requirements of this project. Westforce Construction will ensure that these management requirements are communicated to all project personnel, and they clearly understand the nature of environmental obligations, and how these obligations impact their responsibilities. All the initiatives carried out are aimed not only at ensuring the compliance of Law, but also at establishing high level standards regarding environmental protection at work sites by providing a substantial number of resources devoted to environmental best practices. This EMP will be reviewed every 3 months or when changes occur and will be updated as required throughout the project duration.

This Environmental Management Plan has been developed to:

- Ensure application of best practice environmental management to a project
- Comply with Westforce Construction Environmental Management System ISO 14001
- Comply with Westforce Construction Environmental and Sustainability Policy
- Comply with ENEL HSE Australia requirements
- Comply with the environmental legislation
- Comply with all conditions of approval and commitments
- Comply with all statutory requirements related to environmental protection

This Environmental plan is prepared in accordance with Environmental Legislation, the conditions of the Development Consent and relevant conditions of the environmental planning documentation, and Enel's HSE requirements where applicable within the Civil Balance of Plant (CBOP) contract.

Westforce Construction will implement a Construction Management Plan to align and comply with the project environmental protection, statutory requirements related to environmental protection and ISO 14001. Westforce Construction will also comply with all the requirements contained in client's management plans.

# 3 PROJECT DETAILS

Project Title:	CBOP Flat Rocks Wind Farm
Client:	Enel Green Power
Location:	30km Southeast of Kojonup, WA
Commencement Date:	28/08/2022
Completion Date:	June 2023

# 4 PROJECT DESCRIPTION

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The project consists of 18 x V150 4.2MW wind turbine generators (Tip height 200m, Hub height 125m, 75m blades) and adjacent gravel hardstand area to provide a safe working area for cranes during construction and operations. Each wind turbine will have a reinforced underground concrete foundation and on-site tracks to allow the turbines construction, components delivery and access for ongoing maintenance. Located 280 km south of Perth, Flat Rocks Wind Farm site is 20 km southeast of Kojonup, 27 km northwest of Tambellup, 16 km west of Broomehill in the Shires of Kojonup and Broomehill Tambellup.

The project area is sited in the Great Southern Region of Western Australia, in the center of the southern agricultural region. Broadacre cropping and livestock production are the current land use within and surrounding the development site, a land use that has been in place for many decades. The proposed

action occurs in a highly modified environment due to decades of broadacre agriculture which sees much of the project area classified as degraded to completely degraded. As a result, much of the original vegetation has been cleared with small areas of remaining remnant vegetation.

Access to site during construction and for ongoing operations will be via existing local roads and tracks aiming to limit ground disturbance and clearing of vegetation. All electrical cables within the windfarm will be underground and avoid remnant vegetation where practicable, with WTG and cable routes located in cleared agricultural paddocks. Each turbine site will have a foundation footprint and crane laydown area of 0.2099 Ha equating to approximately 3.778 Ha for total 18 sites. Temporary laydown areas for wind turbine installation, tower and blade laydowns will total 4.57 Ha. A temporary laydown area of 2.08 Ha will also be required to host the concrete batching plant, crane and turbine service areas. Finally, a total area of 0.634 Ha will be required for the installation of permanent maintenance and electrical substation at the point of grid connection.

Refer to Appendix F: Site Layout on orthophoto

# 5 PROJECT ENVIRONMENTAL OBJECTIVES AND TARGETS

Westforce Construction will establish foreseeable and measurable objectives and targets for the project, which apply to the environment and community and are periodically reviewed and measured with the aim of continual improvement and zero environmental incidents, non-conformance, and community complaints. Westforce will employ the Project dashboard and Incident Management functions of Simpel Software to monitor these indicators.

The Westforce Construction Management Team shall demonstrate their commitment to mitigating environmental risk through:

- Effective engagement on site via three monthly leadership visits, participating in toolbox meetings and conducting site inspections and site observations
- Ensuring they have a deep understanding of current environmental matters and relevant legislation
- Ensuring that key personnel are staffed with individuals who possess specific knowledge and experience
- Promoting a positive sustainable culture throughout the entire workforce.

#### The project monthly, targets and KPIs are as follow:

Table 1: Westforce KPIs

OBJECTIVE	TARGET	KEY PERFORMANCE INDICATORS (KPI)
Maintain a high environmental standard across the site to ensure that there is no harm to the environment	Zero environmental incidents related to flora and fauna	Number of environmental incidents related to flora and fauna
Effective management of chemicals	Zero spill over the duration of the project	Number of incidents related to spills of hazardous substances
Minimise dust pollution	Zero complaints recorded from affected parties	Number of environmental complaints related to dust emission due to construction works
Compliance with approval conditions and commitments	Zero non-conformance related to approvals conditions	Number of non-conformances related to approval conditions

#### 5.1 Monthly report

Westforce Construction shall submit a monthly report to Enel within 4 working days after the last day of the period to which it relates. The Monthly Progress Report shall consider the following Enel data reporting templates:

- 1. EGPFR1WF Monthly HSE Data
- 2. Annex D Socio-environmental data, KPIs and Dashboard Consolidated 250922

Monthly reporting shall be completed in accordance with <u>Exhibit D-1 Minimum Requirements of a Monthly Progress Report</u> and submitted to ENEL through Project Wise.

# 6 SCOPE OF WORK

The project scope of work includes but is not limited to:

- Installation of 18 x V150 4.2MW wind turbine generators (Tip height 200m, Hub height 125m, 75m blades)
- Hardstand area to provide a safe working area for cranes during construction and operations.
- Each wind turbine will have a reinforced underground concrete foundation.
- On site tracks to allow construction, components delivery and further maintenance
- Electrical substation, temporary construction laydown areas, compounds, stockpile areas, mobiles concrete batching plants, temporary site offices, warehouses, and amenities.

The proposed action will have minimal direct and indirect impact on the environment as the proposed action will occur in cleared and degraded agricultural land, including the laying of cable and new access tracks.

#### Site preparation:

- · Vegetation removal
- Earthworks

#### Construction site facilities and site services:

• Site facilities set up

#### **Public roads:**

- Vegetation removal
- Public road intersection upgrade to substation
- Entrances upgrade including tree removal whenever needed
- Pre and post construction dilatation report and any repair of damaged caused due to construction activities

# Internal roads to WTGs and to the substation construction & maintenance work:

- Engineering and construction of internal roads Earthworks
- Maintenance of internal roads after major rainfall event
- Repair works where any damage to council roads caused by construction activities

#### **Drainage System and crossings:**

- Engineering and construction of drainage system for 10-year return period rain event
- Hydrology and Hydraulic studies

- Drainage system design
- Drainage channels engineering and construction
- Drainage crossings design and construction including concrete pipes or other solutions and culverts to meet Australian standards
- RIP RAP protection

#### Hardstands for 18 turbines:

Engineering and construction of hardstands Earthworks

#### Foundation works for wind turbines:

- Earthworks
- Subgrade preparation
- Concreting
- Formwork
- Reinforcement
- Anchor cage (free issued by others, including bolt and template)
- Concreting
- Curing
- Grouting
- Sealing (grout area only)
- Crack mapping
- Backfilling

#### **O&M** Building and facilities:

- Vegetation removal
- Earthworks
- Detailed design
- Site preparation and vegetation removal
- Subgrade preparation
- Foundation work
- O&M facilities including fencing
- Structural and non-structural works.

#### 7 MANAGEMENT SYSTEM

Westforce Construction understands that care for the environment is an essential part of conducting its business operations. We operate an Environment Management System which complies with the requirements of ISO 14001. At Westforce Construction we recognise that the construction process has the potential to harm the environment through many intrusive activities. We acknowledge that all employees at Westforce Construction have a duty to minimise and mitigate any damage caused by our operations. Therefore, we have introduced a number of sustainable practices to assist with minimising our carbon footprint and impact on the environment.

These policies are included in:

- Section 20.1 Appendix A Environmental Policy
- Section 20.2 Appendix B Sustainability Policy

# 7.1 Environmental Policy

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At Westforce Construction, we recognise that the construction process has the potential to harm the environment through erosion, destruction of flora, damage to fauna habitat, hydrocarbon spills, pollution of waterways and the atmosphere and other intrusive activities. We understand that care for the environment must be an essential part of our business operations.

Westforce Construction commits to continual improvement of the Environmental Management System to enhance environmental performance and to protect the environment including the prevention of pollution. We integrate environmental management into all our work activities through the implementation of an ISO 14001 compliant Environmental Management System. Westforce Construction

will ensure that we comply with the requirements of applicable legal requirements and with other requirements to which Westforce Construction subscribes that relate to our environmental aspects.

Our approach towards our commitment comprises of:

- Conducting formal risk assessments of potential environmental impacts caused by our activities and implementing measures to mitigate and reduce risks to an acceptable level
- Planning, developing, implementing, and monitoring relevant procedures to minimize any unfavorable environmental impact that may result from our business activities
- Providing our employees and stakeholders with adequate and appropriate environmental training to develop a sense of responsibility for the protection of the environment
- Collaborating with internal and external stakeholders on environmental matters through effective communication and consultation on environmental issues
- Ensuring that our employees are informed of our policy and are aware of their environmental responsibilities in relation to the Westforce Construction business activities.

#### 7.2 Sustainability Policy

At Westforce Construction, we acknowledge that social, economic and environmental sustainability is crucial to the long-term success of our business. As a Civil Engineering and Construction company, we are playing a lead role in preserving the present and creating a sustainable future.

Westforce Construction is committed to integrating economic, social and environmental principles into our business through continual improvement of our sustainability performance, the use of environmental management plans and policies during all construction work, business and management reviews and ongoing education and training for our new and existing employees.

Our approach towards economic, social, and environmental sustainability includes:

- The ongoing review of Westforce Construction business plans and targets, to ensure that we maintain our business quality, profitability, and client satisfaction
- Westforce Construction aims to provide job opportunities through apprenticeships for those entering the industry and ongoing training for our current employees
- The implementation of our Equal Opportunity Policy
- Implementing Environmental Management Plans across all sites
- Maintaining ISO 14001 accreditation
- Engaging suppliers and subcontractors who apply sustainability principles
- Increasing the use of recycled materials
- Reduction and elimination of toxic and harmful substances used during construction
- Recycling of construction waste and building materials after demolition and during construction
- Pre-mobilisation sustainability targets and objectives
- Post-completion reviews of sustainability practices implemented on site
- Ensure that employees are informed of our sustainability polices and targets.

# **8 PROJECT TEAM**

8.1 Westforce Construction Project Team

Name	Position	Contact	Email
	Operations Manager		
	Project Manager		
	Construction Manager		
	Project Engineer		
	Project Engineer		
	Site Superintendent		
	Site Supervisor		
	HSEQ Manager		
	HSE Advisor		
	Environmental Advisor		
	HR Manager		

# 8.2 Project Organizational Chart

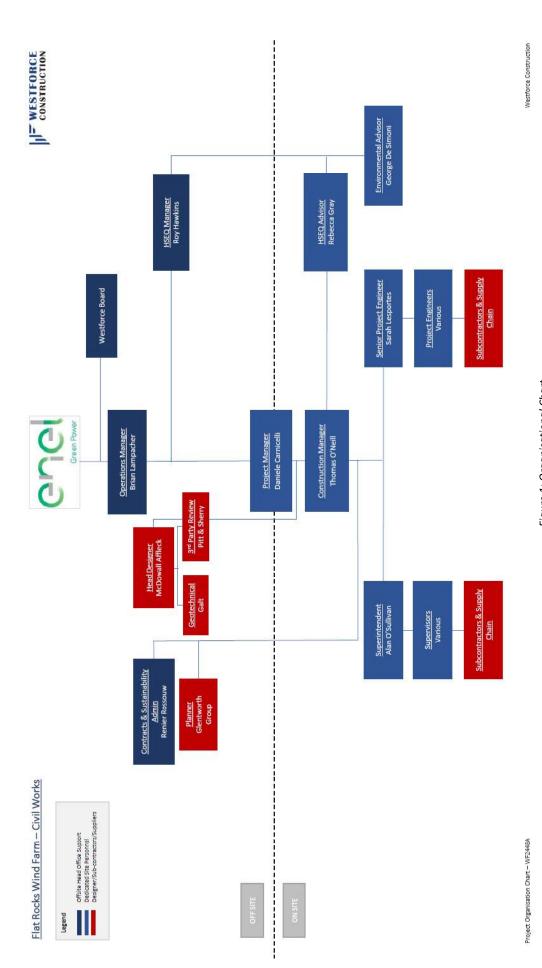


Figure 1: Organisational Chart

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#### 9 ENVIRONMENTAL RESPONSIBILITIES

#### 9.1 Environmental Responsibilities and Accountabilities

Westforce Construction is committed to manage all work activities with due regard to the protection of the environment, providing all the necessary resources to ensure that project personnel are able to comply with project and site environmental requirements and will ensure that its operations are conducted in accordance with Enel's requirements, regulations, impact assessments and other requirements, and will adopt best practice to minimise adverse impact on the environment.

Westforce Construction senior management will provide leadership in achieving the high environmental standards set for the project. They understand the legislative requirements. This information will in turn be provided to all responsible site staff and incorporated into the environmental program as required, to ensure that full legislative compliance is achieved on the project.

Westforce Construction is committed to:

- Integrate health, safety and environmental protection into decision-making and managing activities
- Adopt technologies and practices that creates a continuous environmental improvement
- Take all the necessary actions to eliminate environmental risks
- Take all the necessary actions to avoid, reduce and preventing impacts
- Promote and support an open dialogue with citizens, organizations, and stakeholders on the effects that our activities produce on the communities and the environment
- Define specific and measurable objectives and assess their actual achievement by continuously monitoring the results obtained.

#### 9.2 Westforce Construction Management

It is the responsibility of Westforce Construction Management to:

- Support the Environmental Management System implementation in compliance with ISO 14001:2015
- Ensure that the Westforce Construction Environmental Management System is understood, implemented, and maintained throughout the project, and to ensure environmental outcomes are in line with Westforce Construction policies, internal procedures, and Enel's requirements
- Formally review the Environmental Policy, other related policies, plans and procedures to ensure that they comply with legislative requirements. Reviews will also be conducted when there is a significant change to the work environment
- Ensure that qualified and competent person/s are employed, considering the type of work to be performed, the skills, licences, certificates, and qualifications required
- Ensure that all Westforce Construction personnel and subcontractors understand, accept, and carry out their responsibilities in relation to the environment protection
- Lead by example and promoting sound environmental best practices at every opportunity
- Demonstrate leadership by engaging with workers through observation and discussion and supporting a positive sustainable culture through monthly leadership engagement.

#### 9.3 Project Manager

It is the responsibility of the Project Manager to:

- Review, approve and ensure this Environmental Management Plan it is current
- Ensure that the Westforce Construction Environmental Management System is understood, implemented, and maintained throughout the project, and to guarantee environmental outcomes are in line with Westforce Construction policies and procedures and Enel's requirements
- Ensure that requirements in the EMP and any other relevant environmental requirements are made aware to and understood by all personnel involved in the project and are adhered to
- Ensure that the appropriate environmental legislations, codes of practice, standards and other applicable work procedures are implemented and met
- Be involved with project audits and inspections and ensure corrective actions identified are closed out in the agreed timeframe

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- Be involved in incident investigations and ensure that appropriate corrective/ preventive actions are implemented and closed out
- Identify training needs for project personnel in conjunction with the project team
- Ensure that project team are appropriately trained and fulfil their allocated environmental responsibilities
- Ensure that supervision, appropriate instruction and training are provided to all site personnel
- Formulate safe methods of work in consultation with the Safety Advisors, Environmental Advisor, Engineers, Supervisors and relevant workforce personnel
- Liaise with the HSEQ Manager or delegate in relation to environmental accidents
- Ensure that project objectives and targets are promoted, monitored and achieved
- Consult with the Construction Manager to ensure accurate project performance statistics are collaborated and disseminated to appropriate personnel.

#### 9.4 Construction Manager

It is the responsibility of the Construction Manager to:

- Ensure that requirements in the EMP and any other requirements of the project are made aware to and understood by all personnel involved in the project and are adhered to
- Ensure that the relevant environmental legislations, codes of practice, standards and other applicable work procedures are implemented and met
- Assist with the preparation, review and implementation of project environmental requirements
- Ensure the implementation of the Westforce Construction Environmental Management System is effective and applicable to the scope of work
- Provide support to the Project Manager, Safety Advisor, Environmental Advisor, Engineers and Supervisors in the identification, assessment, and treatment of project risks
- Provide the necessary resources to mitigate the identified environmental risks
- Ensure that work is carried out as planned and that environment is integrated into all site work practices
- Work closely with the Environmental Advisors and HSE on environmental issues and reporting
- Consult and communicate with Westforce Construction Management, project team, employees, subcontractors, and Enel as required
- Be responsible for the overall construction risk management process on the project
- Review the Project Risk Register as required
- Provide support for ongoing environmental risk assessments of works
- Participate in prestart meetings, toolbox meetings and other meetings as appropriate
- Participate in inspections and audits as required.

#### 9.5 Project Engineer

It is the responsibility of the Project Engineer to:

- Ensure that requirements in the EMP and any other requirements specified by Enel are made aware to all personnel involved in the project and are adhered to
- Ensure that the requirements of the relevant environmental legislations, codes of practice and standards and of the project are implemented and met
- Ensure that environmental risk assessments are developed for each task
- Be involved with project audits and inspections and ensure corrective actions identified are closed out in the agreed timeframe
- Be involved in environmental observations and incidents investigations where required and ensure that appropriate corrective/ preventive actions are implemented and closed out
- Participate in prestart meetings, toolbox meetings and other meetings as appropriate
- Participate in the initial project CRAW and other risk assessments process
- Promote environmental awareness through meetings and consultation
- Provide weekly and monthly project reports to Enel.

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#### 9.6 Site Supervisor

It is the responsibility of the Site Supervisor to:

- Ensure that all site environmental rules and regulations are adhered by all site personnel including subcontractors
- Responsible for reporting and investigating environmental incidents that occur within the worksite
- Conduct prestart meetings and participate in toolbox meetings as appropriate
- Participate in the initial project CRAW and other risk assessments process
- Provide support as appropriate to employees and subcontractors
- Ensure plant, equipment and tools reported as defective are out of service tagged and arrange prompt repair
- Ensure that project personnel maintain good housekeeping standards.

#### 9.7 HSEQ Manager

It is the responsibility of the HSEQ Manager to:

- Assist in the preparation of Management Plans
- Ensure that the Management Plans are reviewed and updated as and when required
- Ensure that Westforce Construction Environmental Management System is implemented and maintained in accordance with ISO 14001:2015
- Conduct internal audits to verify compliance with relevant Environmental legislations, codes of practice, standards and project requirements
- Develop and regularly review the Westforce Construction Environmental Management System and environmental procedures
- Provide environmental advice and support as appropriate to Westforce Construction management and employees
- Ensure project team have received relevant environmental training and are competent in assessing and managing environmental hazards and risks
- Monitor developments and changes in legislation and environmental management, and recommend appropriate changes to polices, plans and procedures
- Liaise with the project team to conduct incident investigations, prepare reports and corrective/ preventive actions and ensure raised issues are closed out
- Conduct HSEQ inductions
- Reporting on the performance of OSHE to senior management at management reviews as a basis for improvement of the management systems
- Ensure that environmental records are maintained as required.

#### 9.8 HSE Advisor

It is the responsibility of the HSE Advisor to:

- Review and monitor to ensure that the requirements of the relevant OSHE legislations, codes of practice and standards and of the project are implemented and met
- Communicate with the Project Manager/ Construction Manager/ Environmental Advisor/ Site Superintendent/Site Supervisor/ Enel on OSHE matters onsite
- Conduct toolbox meetings and participate in prestart meetings
- Facilitate weekly HSE meetings
- Ensure Westforce Construction site inductions completed
- Ensure that all employees and subcontractors involved in the project undergo site induction before commencing site work
- Report to Enel representative immediately, or as soon as is reasonable and practicable, on any incident occurrence
- Ensure that SWMS are developed, reviewed against WHS-FM-017 SWMS Review Checklist, understood and signed off by the work crew monthly or where there is a change.

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#### 9.9 Environmental Advisor

It is the responsibility of the Environmental Advisor to:

- Implement this Environmental Management Plan
- Ensure that requirements in the EMP and any other requirements specified by Enel are made aware to all personnel involved in the project and are adhered to
- Ensure that Westforce Construction Environmental Management System is implemented and maintained in accordance with ISO 14001:2015
- Ensure that the requirements of the relevant environmental legislations, codes of practice and standards and of the project are implemented and met
- Ensure that all site environmental rules and regulations are adhered by all site personnel including subcontractors
- Provide environmental advice and support as appropriate to project personnel
- Attend and provide active input into CRAW process
- Communicate with the Project Management Team/ Enel on environmental matters onsite
- Participate in toolbox meetings and prestart meetings
- Liaise with the project team to conduct environmental inspections, incidents investigations, raise environmental observations where required and ensure that appropriate corrective/ preventive actions are implemented and closed out
- Ensure that all plant mobilised to site comply with Simpel Plant Induction requirements (Plant Risk Assessment, Service History and Maintenance Records) prior to use.
- Ensure that environmental records including forms, checklists and registers are completed and maintained as required
- Promote environmental awareness through meetings and consultation
- Monitor and review employee and subcontractors' operations on site through daily inspections and weekly inspections to ensure environmental requirements are complied with and works are carried out in accordance with project specifications
- Before to start and during any activity, carry out a risk assessment to identify potential risks, and ensure adequate measures to prevent these risks
- Use the risk assessment by comparing the hazards identified daily before the work on site begins and the mitigation plans developed to control these hazards.
- Be accountable for the management of environmental construction performance throughout the project.

#### 9.10 Employees and Subcontractors

It is the responsibility of all employees to look after their own safety and health and the safety and health of other employees; they must also:

- Ensure that work is carried out in compliance with legislations, environmental procedures and project requirements
- Ensure that all Westforce Construction policies and procedures are followed
- Look after their own environmental observations and the others
- Attend and actively contribute to daily prestart meetings
- Attend and actively contribute to monthly toolbox meetings
- Report any environmental observation in the workplace. The report must be made immediately to the Supervisor and the situation rectified if safe to do so
- Report and act upon any violations of this EMP, environmental legislation, or accepted industry work practices
- Report any identified improvement opportunities and/or positive observations
- Ensure that the work area is kept clean and tidy
- Ensure correct usage of all plant and equipment
- Actively participate in the preparation of environmental risk assessments to ensure that they do not expose themselves or others to workplace risks and hazards
- Speak out if an environmental observation arises

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 Submit SDS on hazardous materials used in their work to the Westforce Construction site representative prior to commencing the work.

# 10 LEGAL AND OTHER COMPLIANCE REQUIREMENTS

Westforce Construction will ensure that all legal and other requirements, including all environmental legislation, codes of practice, Australian standards and other requirements relevant to the project activities are identified and considered.

All relevant health, safety and environmental legislation, codes of practice, Australian standards are documented and within WHS-REG-012 Legal Register-Project.

The following regulations will be adhered to:

- Aboriginal Heritage Act (WA) 1972;
- Agricultural and Related Resources Protection Act (WA) 1976;
- Biosecurity and Agricultural Management Act (WA) 2007;
- Biosecurity and Agricultural Management Regulations (WA) 2013;
- Biodiversity Conservation Act (WA) 2016;
- Biodiversity Conservation Regulations (WA) 2018;
- Bush Fires Act (WA) 1954;
- Bush Fires Regulations (WA) 1954;
- Conservation and Land Management Act (WA) 1984;
- Conservation and Land Management Regulations (WA) 1992;
- Contaminated Sites Act (WA) 2003;
- Contaminated Sites Regulations (WA) 2006;
- Dangerous Goods Safety Act (WA) 2006;
- Dangerous Goods Safety (General) Regulations (WA) 2007;
- Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations (WA) 2007;
- Environmental Protection Act (WA) 1986;
- Environmental Protection Regulations (WA) 1987;
- Environmental Protection (Clearing of Native Vegetation) Regulations (WA) 2004;
- Environmental Protection (Controlled Wastes) Regulations (WA) 2004;
- Environmental Protection (Noise) Regulations (WA) 1997;
- Environmental Protection (Unauthorised Discharge) Regulations (WA) 2004;
- Environment Protection and Biodiversity Conservation Act (Cth) 1999;
- Environment Protection and Biodiversity Conservation Regulations (Cth) 2000;
- Health (Asbestos) Regulations 1992;
- Heritage of Western Australia Act 1990;
- Soil and Land Conservation Act (WA) 1988;
- Soil and Land Conservation Regulations 1992 (WA);
- Waterways Conservation Act (WA) 1976;
- Waste Avoidance and Resource Recovery Act (WA) 2007;
- Waste Avoidance and Resource Recovery Regulations 2008 (WA).

#### 10.1 Other legislation

The following local laws will be adhered to:

- Western Australian Government Gazette, Shire of Kojonup Health Local Laws, April 2000
- Western Australian Government Gazette, Shire of Broome Hill- Tambellup Health Local Laws, 2020
- Western Australian Government Gazette, Shire of Broome Hill-Tambellup Waste Local Law 2020

#### 10.2 Approvals

Westforce shall support the project with compliance to all regulatory environmental approvals related to CBOP construction. The following approvals have been provided to Westforce by Enel and will be adhered to:

2021 AMENDMENT of Development Approval – Kojonup Council (2021)

- 2021 AMENDMENT of Development Approval Broomehill-Tambellup Council & JDAP (2021)
- EPA determination (18/04/2011)
- EPBC Act referral decision (22/03/2022)

# 11 TRAINING, AWARENESS AND COMPETENCY

All Westforce Construction employees and subcontractors will attend a project induction where this plan will be communicated so that all employees and subcontractors are aware of the requirements and the management actions. Additionally, site specific environmental information will be incorporated into the project induction. Relevant environmental topics will be incorporated within daily prestart meetings or toolbox meetings for presentation to the project personnel.

The Environmental Advisor or delegate will maintain records of training and competencies in environmental practices and procedures for the project. Accurate training records, both electronic and hard copies are maintained, reviewed for currency, and updated regularly on <u>WQA-REG-002-C2448 Training Matrix</u>.

#### 11.1 HSEQ Induction

Each person engaged for the purpose of work on site and prior to commencing work, shall complete a project induction informing of the health, safety and environmental obligations that apply to the project including but not limited to:

- HSEQ policies and Project Management Plans
- project overview and scope of works
- project objectives and targets
- legal responsibilities
- protected areas (including Heritage and Aboriginal)
- sensitive areas (foot rot, weed, native vegetation)
- applicable OSHE legislation
- minimum site requirements
- risk controls and management process etc.
- emergency procedures
- potential hazards and reporting processes
- waste handling and disposal
- incident reporting
- housekeeping
- safe work procedures
- PPE requirements.

Where required, all personnel will also attend any induction conducted by Enel or and any other relevant inductions. Inductees will undertake an assessment and sign onto WHS-FM-016 Site Induction Assessment to declare that they have received and understood the induction-training program. The induction will be conducted prior to arrival on site via the Simpel platform. Once on site all personnel will be required to undertake a short familiarisation induction WHS-IND-021-C2448 Site Familiarisation induction. This induction will reiterate key items mentioned during the online Simpel Site Induction.

#### Other Environmental Training

Westforce Construction employees and subcontractors may also be required to undergo specific training such as but not limited to the following:

- Enel required environmental training
- Additional specialist environmental skills training (e.g., fauna handling) will be provided for project staff as determined by operational requirements.

Note: Simpel is a construction industry software which provides Westforce an end-to-end operations management and site access control for work sites.

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# 12 COMMUNICATION

The Environmental Advisor or delegate will actively promote considerations of environmental issues at prestart meetings and toolbox meetings, with appropriate environmental topics incorporated into the meetings for presentation to the project personnel. All attendees will be encouraged to actively participate in these meetings and raise any environmental issues they encounter on the project. Poster and other promotional materials will be placed in crib room and site office to reinforce environmental awareness with the project personnel.

#### 12.1 Communication and Consultation Process

Communication and consultation with all parties is also the key to successful management. We believe in working closely with our clients, subcontractors, employees, and relevant stakeholders. Our aim is to continually improve communication with them to promote OSHE awareness to maintain a high level of compliance with environmental procedures and processes.

Westforce Construction believes having a shared vision and common goals can improve workplace environmental performance. We consider this approach will provide the management and employees of Westforce Construction the opportunity to work together to improve environment and sustainability.

<u>WQA-PR-008 Communication, Consultation and Reporting</u> also describes the internal and external Health, Safety, Environmental and Quality communication, consultation, and reporting processes established in Westforce Construction. External parties include Enel, Consultants, main contractors, stakeholders, regulatory authorities, contractors and the public on enquiries, information requests, complaints, and incidents.

#### 12.2 Communication and Community Relations at worksite

Westforce Construction is committed to eliminating or minimising environmental nuisance upon the local community during project or other associated activities. <u>WEM-SWP-107 Community Relations at the Worksite</u> outlines the measures taken to control, monitor and measure local community impacts.

#### 12.3 Communication and Consultation with Other Relevant Stakeholders

The communication and consultation with other relevant stakeholders i.e., Enel, other entities and the public on HIRAC (Hazard Identification, Risk Assessment and Control) matters which may affect them are summarised in the table below:

Table 2: Westforce Communication Methods

Group	Communication and Consultation Method	Record of Communication and Consultation
	Risk assessment workshop	Project Risk Register
	Project meetings	Meeting minutes
Enel Green Power	Progress reports	Progress report
	Formal correspondences	Emails, Transmittals, TQs, RFIs
	Face to face discussions	NA
Other entities e.g., authority	Risk assessment workshop	Project Risk Register
(Western Power, MRWA,	Project meetings	Meeting minutes
DPaW, local councils etc.),	Formal correspondences	Emails
Vestas	Face to face discussions	NA
	Letter drop/ notices	Letter/ notices
Public/ residents/businesses	Face to face consultation sessions	NA
	Signage	NA

#### 12.4 Workplace Health, Safety and Environmental Representatives

Where the workforce deems it necessary, Health, Safety and Environmental Representatives may be elected for the purpose of promoting health, safety and environment on the worksite and will assist site management in the implementation and maintenance of all necessary practices and procedures. The election and training of such representatives shall be conducted in accordance with relevant legislation.

Westforce Construction shall provide all reasonable support and encouragement in those roles, towards the improvement of workplace OSHE and will seek to establish an open communication process on all issues. The primary role of an HSE Representative/s is to promote health, safety and environment from the ground up and liaise with management on any issues arising.

#### 12.5 Notice Boards

Dedicated OSHE notice boards shall be provided within the site offices and crib rooms, displaying relevant health, safety and environmental notices, including the following:

- Environmental Alerts
- General OSHE topics
- Statistical OSHE data
- Emergency response instructions and contact details
- Company policies
- Toolbox minutes
- Notices and alerts from Enel
- Notices and alerts from others in the industry

The Environmental Advisor /HSE Advisor/ Site Supervisor are responsible for maintaining the currency of information on display.

#### 12.6 Environmental, Health and Safety Information

HSEQ Alerts are issued to raise awareness of environmental observations to analyse and investigate to make preventive actions for the future. The HSEQ alerts are available to all Westforce Construction employees via our server and distributed to all project sites to raise awareness of work-related accidents and incidents and to ensure that communication is given across the entire organisation in order to learn and prevent similar incidents from occurring or reoccurring. Relevant Acts, Regulations, Australian Standards, Codes of Practice, Guidance Notes and other environmental related information will be made readily available to all employees upon request.

#### 13 EMERGENCY RESPONSE MANAGEMENT

Emergency response management requirements have been developed to address potential environmental emergency situations identified from HSE planning and risk management processes. The emergency response management are included in <a href="https://www.whs-doc-002-C2448"><u>WHS-DOC-002-C2448 - Emergency Management Plan.</u></a>. Information on emergency response management requirements is provided to project personnel through site induction and available on site at all times.

# 14 ENVIRONMENTAL RISK ASSESSMENT

<u>WHS-REG-015-C2448 HSE Risk Register</u> includes the environmental aspects and impacts specific to the project scope of work and also environmental risks raised from the CRAW. The project management team will review the register whenever a significant incident or non-conformance is reported, or when the scope of works changes. A copy of the risk registers will be maintained on site and will be communicated to the project personnel. The project management team will also ensure that potential environmental aspects and impacts are considered and incorporated into risk management activities for the project.

Prior to mobilising to site Westforce Construction, Enel and other relevant stakeholders will identify and assess the environmental risks which may arise within the project and identify the controls required during a Construction Risk Assessment Workshop (CRAW). Environmental risks and controls identified during the CRAW will be incorporated in the Project risk register.

# 15 ENVIRONMENTAL PROCEDURES AND GUIDELINES

It is recognized that construction activities will inevitably impact the environment to some extent, and it is crucial that these impacts be managed, minimized and mitigated. Westforce Construction will ensure that all project

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personnel clearly understand the nature of their environmental obligations. The established procedures outlined in the Environmental Management Plan for the construction phase comply with the conditions of the environmental and planning approvals and the application/referral commitments. This Environmental Management Plan has been developed by Westforce Construction to ensure that the company complies with:

- Australia environmental legislation
- All statutory requirements related to environmental protection
- Westforce Construction Environmental and Sustainability Policy
- Westforce Construction Environmental Management System in compliance with ISO 14001.
- Enel HSE Australia requirements
- Potential environmental impacts identified for the project (2021 DA Amendment Application Report (2021)
- 2021 AMENDMENT of Development Approval Shire of Kojonup 28/09/2021
- 2021 AMENDMENT of Development Approval Shire of Broomehill-Tambellup 06/12/2021
- EPA decision date from 18/04/2011
- EPBC decision date from 22/3/2022
- All environment and planning approval conditions
- Referral commitments

Westforce will ensure that the construction phase complies with all approval conditions pertaining to CBOP construction referenced in the documents:

- 2021 AMENDMENT of Development Approval Shire of Kojonup 28/09/2021
- 2021 AMENDMENT of Development Approval Shire of Broomehill-Tambellup 06/12/2021

The commitment of Westforce Construction to be responsible and sustain environmental performance and prevention of pollution is set out in <u>WEM-POL-001 Environmental Policy</u>. Westforce Construction is also committed to social, economic and environmental sustainability as described in <u>WEM-POL-002 Sustainability Policy</u>.

#### 15.1 Flora and Fauna

Westforce Construction is committed to avoid, minimise and mitigate the impacts upon the environment, flora, fauna and biodiversity, including mitigation measures to reduce the invasion of alien species and ensure that the continuous monitoring and management of alien species is undertaken. Where applicable, plant rescue to support conservation strategies inside Westforce Construction project areas will be performed. Revegetation and habitat rehabilitation actions will adhere to the specifications outlined in the final project designs, which include but is not limited to access roads, turbine locations and site facilities.

The following measures will be taken by Westforce Construction to manage flora and fauna:

- Strictly no unauthorised native vegetation clearing
- Any native vegetation clearing can only proceed according to the conditions of the relevant Vegetation Clearing Permit obtained through the Department of Water and Environment Regulation (DWER)
- No vegetation type is to be removed, cleared, or disturbed without prior approval
- Limit ground disturbance and clearing of vegetation (where possible) to designated areas and access routes, avoiding habitat trees (larger trees and trees with hollows). The project civil design has been developed to avoid clearing of native vegetation (as defined in section 51A of the Environmental Protection Act 1986).
- To minimise soil disturbance and weed/disease (foot rot) propagation during construction phase, standard vehicle hygiene will be implemented to ensure introduced (exotic) species and harmful organism do not become established within the Flat Rocks Wind Farm survey area.
- Vehicles and equipment shall not be driven over, or parked on, tree root and weed know zones as far as practicable
- Maintain existing drainage systems, ensuring tracks and other infrastructure areas do not disrupt or divert historic water flow patterns.
- Access to construction sites will predominately be via existing local roads and tracks to limit water flows impacts and consequently, fauna and flora effects.

- Stockpiling, laydown areas and office were designed to be implemented on cleared areas
- If injured/sick fauna is encountered in the project area, Kojonup or Katanning Veterinarian Centre will be prompted
- If encounter fauna, allow fauna to move on if there is no threat to safety of site personnel
- Feeding fauna in the project area is prohibited, unless the person has lawful authority to feed it, according to Section 155 of the Western Australian Biodiversity Conservation Act 2016
- If threatened or priority flora and fauna are encountered, immediately report to HSE team. Subsequent the report, Westforce Construction will notify the ENEL
- Plant mobilised are to meet Westforce Construction environmental specifications

The <u>WEM-SWP-102 Flora and Fauna Management</u> procedure outlines the measures taken to control, monitor and measure potential impacts to flora and fauna during activities performed by Westforce Construction.

Special attention will be dedicated to 12 specific Fauna species (Appendix C) during daily works regarding to the potential species occurrence on the project area. Reference: Flora, Vegetation and Fauna Assessment of the Flat Rocks Wind Farm Survey area prepared by Mattiske Consulting Pty Ltd (November 2010)

ID	Species	Common name
1	Bettongia penicillata subsp. Ogilbyi	Woylie
2	Calyptorhynchus banksii subsp. naso	Red-tailed Black Cockatoo
3	Calyptorhynchus baudinii	Baudin's Cockatoo
4	Calyptorhynchus latirostris	Carnaby's Black Cockatoo
5	Dasyurus geoffroii	Quoll/Chuditch
6	Isoodon obesulus subsp. fusciventer	Bandicoot/Quenda
7	Macropus eugenii subsp. derbianus	Tammar
8	Macropus irma	Wallaby
9	Macrotis lagotis	Bilby
10	Myrmecobius fasciatus	Numbat
11	Phascogale tapoatafa subsp.	Phascogale
12	Pseudocheirus occidentalis	Western Ringtail Possum

Table 3: Project area fauna

#### 15.2 Land access, Biosecurity and Environmentally Sensitive Areas

Weeds, plant material or seeds could be introduced to or spread within the project area through the importation of fill (e.g., road base) or the movement of vehicles and people. Declared pest organisms establish themselves in natural ecosystems and proceed to modify natural processes, usually adversely, resulting in the decline of the communities they invade. It is essential to ensure, through appropriate procedures, that all equipment imported into the project area is properly clean and free of weed and potential soil diseases such as Asparagus asparagoides, Phytophthora dieback and Foot rot.

#### 15.2.1 Asparagus asparagoides

Farm biosecurity covers a range of practices to keep livestock and crops free of disease pests and weeds. The Biosecurity and Agriculture Management Act 2007 (BAM Act), Section 22, makes provision for a plant taxon to be listed as a declared pest organism in respect to parts of, or the entire State. According to the BAM Act, a declared pest is defined as a prohibited organism (Section 12), or an organism for which a declaration under section 22 (2) of the Act is in force. Asparagus asparagoides is a Declared Pest under s22(2). According to section 30 (3) of the BAM Act, if a declared pest is found in the area, the owner or occupier of land, or a person who is

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conducting an activity on the land, must take the prescribed control measures to control the declared pest if it is present on the land.

Westforce Construction will consult with landowners before the commencement of site works on the location of known weed infestations and other local soil diseases such as foot rot. Measures including but not limited to vehicle inspection, access control by gates and checklist is necessary to control biosecurity risks will be in place.

Westforce Construction will implement the following control measures:

- All vehicles and plant entering/leaving potential contaminated areas will be cleaned and washed down to ensure they are free from mud, soil and vegetative materials
- All plant and vehicles will enter and leave the site through the access points designated by the client and/or farmer, where relevant
- Soils will be moved in dry conditions as far as practicable
- Stockpile material will be bunded to prevent runoff and monitored when required
- Become familiar with local declared weeds (Landcare officer Kojonup)
- Driving restriction through areas with known weed presence

<u>Details are depicted in WEM-SWP-102 Flora and Fauna Management and WEM-FM-003 Vehicle and Mobile Equipment Weed Hygiene Form</u>

#### 15.2.2 Phytophthora dieback

Dieback is the name generally used in Western Australia to describe the disease symptoms of, and the causal agent, Phytophthora cinnamomic, a microscopic and soil-borne organism. Humans have the potential to spread dieback further and faster than any other means through the disturbance and movement of infested soils. Dieback occurs in the south-west of WA in an area called the vulnerable zone. Not all parts of the zone are equally vulnerable, dieback is particularly widespread in the areas of 800 mm+ annual rainfall, i.e., forested regions. This map shows locations of plant disease information (Phytophthora species). <a href="https://dieback.net.au/dieback-public-map/">https://dieback.net.au/dieback-public-map/</a>.

Management objectives consistent with avoid the introduction or spread of Dieback. Westforce Construction target is zero register occurrences of dieback within the areas of native vegetation that can be directly attributed to project activities. Westforce Construction will implement the following control measures:

- All vehicles and plant entering/leaving potential contaminated areas will be cleaned and washed down to ensure they are free from mud, soil and vegetative materials
- All plant and vehicles will enter and leave the site through the access points designated by the client and/or farmer, where relevant
- Soils will be moved in dry conditions as far as practicable
- Stockpile material will be bunded to prevent runoff and monitored when required
- Become familiar with local declared weeds (Landcare officer Kojonup)
- Driving restriction through areas with known weed presence

<u>Details are depicted in WEM-SWP-102 Flora and Fauna Management and WEM-FM-003 Vehicle and Mobile Equipment Weed Hygiene Form</u>

#### 15.2.3 Foot Rot

Footrot is a foot disease of cattle, sheep and goats. In sheep and goats, footrot is a contagious bacterial infection caused by the pathogen Dichelobacter nodosus. Footrot in sheep is classified as benign, intermediate or virulent.

When working in high-risk locations for foot rot, all employees and subcontractors must take the following precautionary measures:

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#### Restriction

- Westforce Construction will restrict subcontractors working in sensitive foot rot disease areas
- Exclusive entry and exit points (restricted to only one point for entry and another point for exit)
- Drive areas restricted do existing tracks and roads

#### **Control**

- Signage in place to inform workers of biosecurity status and what is require from them. Signs should contain simple messages (e.g., 'Do not enter the farm without prior approval')
- Plant involved in stripping works to be clear of all topsoil and vegetation prior to moving between affected paddocks

<u>Details are depicted in WEM-SWP-102 Flora and Fauna Management and WEM-FM-003 Vehicle and Mobile</u> Equipment Weed Hygiene Form

#### 15.3 Bushfire Prevention and Environment Conservation

Work areas where bushfire is identified as high risk, and during the period of declared Total Fire Bans (TFB) and Harvest and Vehicle Movement Bans, all personnel including subcontractors will comply with:

- Western Australia Model Bush Fire Management Plan;
- Bush Fire Act 1954;
- Bush Fire Regulations 1954;
- Project-specific Bushfire Management Plan. (12574907-ENE00-EN-PLN-001\_C Bushfire Management Plan)

#### Diesel vehicles/machines controls:

- Vehicles with DFP (Diesel filter Particulate) system should always be turned off wherever they are needed to be parked over vegetation.
- Vehicles with DFP (Diesel filter Particulate) should be driven off the vegetation and onto the roads if the filter cleaning process starts on its own
- Vehicles need to be kept free of vegetation on the undercarriage.

Management actions are depicted in <u>WHS-DOC-002-C2448 - Emergency Management Plan, WHS-DOC-001-</u>C2448 - OSH Management Plan and 12574907-ENE00-EN-PLN-001 C Bushfire Management Plan

#### 15.4 Air pollution and Vibration Management

Particular attention should be given in evaluating noise, air pollution and vibration impacts. The activities that generate the greatest contribution for these impacts are in general: movement of heavy vehicles, demolition, excavations, earthworks, concrete and cement production. Westforce Construction is committed to manage the negative effects from noise, dust/air pollution and vibration generated during project and other associated activities. The <u>WEM-SWP-104 Noise</u>, <u>Dust and Vibration Management</u> outlines the measures taken to control, monitor and measure noise, dust and vibration during activities performed by Westforce Construction.

Air quality and dust management:

- To prevent gases and particulate emissions, vehicles are equipped with catalytic mufflers, particulate filters for diesel engines and a rigorous maintenance control.
- The area disturbed will be the minimum required for construction
- Dust suppression techniques and/or watering of exposed ground surfaces and stockpiles will be implemented via watercart or bobcat with a water tank if required
- Any site roads with the potential to give rise to dust will be regularly watered, as appropriate, during dry and/or windy conditions
- Keeping dust suppression equipment on site
- Covering trucks if dust generation from the load is a problem
- Limiting traffic to haul roads/definition of trafficable areas
- Air Quality sampling to check conditions on-site

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Daily visual dust assessment of workplace and during all environmental site inspections.

Noise and Vibration Management:

- All plant and equipment will be maintained in sound mechanical condition with scheduled maintenance and prestart inspections
- Westforce Construction will ensure that whenever possible, noise and vibration produced in association
  with works undertaken will achieve the noise levels outlined in Environmental Protection (Noise)
  Regulations 1997 and local government requirements
- Manage noise vibration so that it complies with industry best practice
- All plant is fitted with mufflers
- Idling of all vehicles and plant will be kept to a minimum
- Any equipment that generates noise and vibration will be located as far as practicable from existing occupied facilities and environmental assessment will be performed during site inspections.

#### 15.5 Waste Management

Westforce Construction is committed to manage the negative effects of the waste generation on human health and the environment by applying the waste hierarchy. The waste hierarchy ranks waste management options in order of their general environmental desirability, from avoidance as the most preferred option, through various resource recovery options, to the least preferred option of disposal. In particular, the procedure applies to all subcontractors carrying out activities at Westforce Construction worksites.



Figure 2: Waste hierarchy based on the Waste Avoidance and Resource Recovery Act 2007 (WARR Act)

### 15.5.1 Waste Storage Areas

Waste will be segregated and removed by a licensed Waste Removal Contractor on a regular basis to respect waste storage limits. Westforce will ensure that the site waste storage area make allowance for the waste materials generated by the other contractors throughout the construction phase. The waste storage areas are located in the southwest portion of the Site Facility as depicted in Appendix D - Site Facilities Layout.

#### Storage limits:

- no more than 20 m3 of not hazardous waste
- no more than 10 m3 of hazardous waste

#### Waste Removal frequency:

- Monthly
- As needed

#### Temporary waste storage

• The temporary storage on the work sites areas will be done in proper containers and limited to the time of activities execution. At the end of the day, the waste must be transferred to the main specific storage area.

#### Signalization

 Suitable safety signs will be installed next to the main storage area of hazardous and non-hazard waste, identifying the type of stored waste, the main risks involved, and the prohibitions and requirements to be observed

#### Not allowed

• Waste storage on-site out of the designated areas is entirely prohibited.

#### 15.5.2 Hazardous waste

The following is a list of general procedures for hazardous waste storage areas

- The area is fenced in, with a waterproof cover
- The storage area has adequate size to capably store the volumes of waste previously estimated in the design phase of the works
- The containers used to contain hazardous waste possess suitable strength requirements in relation to the chemical and physical properties, as well as the hazardous specifications of the waste contained within them
- Process waste materials that can combine to react dangerously, giving rise to explosive, flammable and toxic substances, are stored to avoid contact with each other
- Liquid wastes are collected in designated bins made of a suitable material and of adequate capacity
- Suitable cover to prevent the direct radiation as well as leaching and rainwater accumulation
- Chemical analysis of polluted soil and water will be provided when necessary.

#### 15.5.3 Non-hazardous waste

The following is a list of general procedures for non-hazardous waste storage areas

- The area is fenced in
- The surface of the storage area has an adequate size to capably store the volumes of waste previously estimated in the design phase of the works
- The waste is separated by type (wood, iron, plastic, paper, metal, etc.)
- Rainwater and wind protection

#### 15.5.4 Process waste

The following is a list of general procedures for process waste

- The area is fenced in
- The waste is separated by type avoiding any accumulation in "bulk" mode
- Piles of waste materials that are sensitive to weather conditions are protected by suitable covering systems.

Note: Broken PV panels must be segregated and collected as waste of electric and electronic equipment (WEEE) giving particular attention to avoid dispersion in the environment of any fragments.

The waste management objectives are:

- Avoid and minimise unnecessary waste generation
- Minimise wastage of materials and energy
- Reuse and recycle where applicable

- Keep site neat and tidy with litter and waste placed in appropriate disposal area
- Guarantee appropriate waste storage, treatment and final destination
- Properly storage and disposal

<u>The WEM-SWP-105 Waste Management procedure</u> outlines the measures taken to control, monitor and measure waste management during activities performed by Westforce Construction.

While it is anticipated that the measures detailed in this Plan will be adequate to ensure that the disposal and management of wastes do not adversely affect health, amenity or environmental values, Westforce recognises that it is best practice to develop contingency actions which are to be implemented upon the identification of potential non-conformances with the intended waste management measures.

#### 15.6 Erosion and Sedimentation Control

The potential for soils to erode is generally based on the grading of the soil (i.e., the proportion of clay, silt, sand, and gravel) and its organic content. Silt and fine sands are typically more readily eroded than clays, coarse sands, or gravels. Well-vegetated soils are typically less susceptible to erosion. The potential for erosion needs to be considered during the design and construction of the civil works. Water or wind erosion could occur on access tracks, construction sites and other disturbed areas, particularly following periods of heavy rainfall. As a result, the potential for erosion to occur also depends on environmental factors such as exposure to wind or surface water erosion. Given the generally low gradients and soils of the project area, the potential for water erosion is low. Even so, careful consideration will be given to the construction and maintenance of drainage around access, trenches, and hardstands to reduce the potential for erosion and sediment control.

Although there are several defined drainage lines and gullies, there are no permanent watercourses in the project area, the largest of these carry surface flow for several months after winter rain and then form permanent pools over the summer and warmer months. The porous soils and low slopes of the project area mean that runoff would occur only during and shortly after intense rainfall.

Good drainage conditions that will not allow water to pond below or adjacent to the tracks are important for pavement performance. Well contoured table drains of suitable depth to manage the anticipated rain events are recommended for this purpose. The completed hardstand surface will be capped with a relatively low permeability granular material and provided with a slope (which may be limited by requirements for a level pad beneath cranes) to prevent the ponding of water on the hardstand surface or infiltration into the subgrade materials that could result in loss of strength.

Temporary drainage measures will be provided at the crest and toe of all temporary and permanent batter slopes to prevent the infiltration, ponding, or build-up of water behind the top of the batter slope which could affect its stability. All batter slopes will be carefully inspected following periods of rain to assess the risks to personnel at the base and above the crest of the excavations.

Westforce Construction is committed to take all reasonable and practicable measures to minimize soil erosion and the adverse effects of sediments transport. Erosion and sediment control practices need an appropriate balance between the application of the recommended design technique and site-specific characteristics. The <a href="WEM-SWP-103 Erosion">WEM-SWP-103 Erosion</a> and Sediment Management procedure outlines the measures taken to control, monitor and measure erosion and sediment during activities performed by Westforce Construction.

# **Project Planning:**

Prior to the commencement of project, sediment and erosion controls for the site will be carefully planned and implemented. The degree of stormwater management and erosion control required will depend on soil type, rainfall pattern, existing drainage patterns, site contours and total area of exposed soil. Erosion protection such as vegetation, silt fences, or geofabric covering may be required to prevent erosion and disturbance of loose near surface soils.

#### Control measures to be implemented to reduce runoff, sediment control and erosion processes

- A staged clearance plan which minimises exposed areas and restricts disturbed areas to minimum at any
  one time
- All access roads within the project area will be appropriately constructed, graded and drained to minimise erosion.

- Access roads will be designed so that runoff is shed to the sides of the road, where it will infiltrate or dissipate.
- Where necessary, roadside bunds and swales will be provided to intercept and infiltrate runoff.
- Control access to the site via site entry and exit points, clearly marked roads and designated parking areas
- Maintain vegetation cover for as long as possible
- Rehabilitate areas immediately using mulch and local vegetation species
- Incorporate silt traps to slow the flow, collect silt and sediment and minimise erosion
- Locating stockpiles away from run off areas and possible erosion sources
- Provide temporary cut off drains to divert flow from areas without vegetation and where stockpiles are created, or where erosion is likely to occur
- Compact or stabilise stockpiles to stop erosion and run off
- Stormwater inlets in the vicinity of construction work will be lined with geofabric if required, where the potential for excavated or uncovered material to contaminate water runoff exists
- Concrete works will be conducted to minimize spills or damage to surrounding fauna and flora
- Storage of fuels and hazardous substances to be secured and equipped with appropriate spill kits and Safety Data Sheets
- Servicing, maintenance and wash down of vehicles and equipment within designated area
- Any silt or mud split onto road surfaces or on vehicles shall be regularly removed
- Only authorized vehicle is to be allowed on site
- Use only designated vehicle tracks or access
- Provide temporary sediment traps in all open drains or cut-off drains e.g.
  - Straw Bales.
  - Geotextile Barriers.
- Certain site activities should be separated into contained areas and must not be conducted within or in close proximity to existing drainage channels that lead to natural waterways. The activities of concern include:
  - Vehicle/ concrete wash down areas,
  - Maintenance and lay down yards,
  - · Chemical storage and handling,
  - Waste storage,
  - Lunch/ office facilities.

<u>Details are depicted in WEM-SWP-103 Erosion and Sediment Management and WQA-DOC-003- C2448</u> Construction <u>Management Plan</u>.

#### 15.7 Heritage and Archaeology

The project area has no recognised places by the Commonwealth Heritage or places having heritage values as shown by database and site surveys undertaken by R&E O'Connor in conjunction with John, B, Cecchi, in 2010. The respective reports are titled: Report on an Ethnographic Survey of the Proposed Flat Rocks Windfarm Site between Kojonup and Broomehill prepared by R&E O'Connor (Ethnographic Survey), and Report on an Archaeological Survey of the Proposed Flat Rocks Wind Farm WA by John, B, Cecchi, (Archaeologic Survey). In the same way, no items or places of any Indigenous heritage value have been identified in the project area as reported in the Ethnographic and Archaeologic Surveys prepared by R&EO'Connor and John, B, Cecchi.

A site survey consisting of walked and vehicular traverses of the project area found no signs on any archaeological sites or material. The archaeological report recommends that there is no impediment on archaeological grounds to the Flat Rocks wind farm project proceeding. If during project construction, any archaeological material discovered by Westforce Construction will comply with the requirements of the Aboriginal Heritage Act 1972.

Two registered sites were found in close proximately to the development site but will have no effect on the proposed FRWF.

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- Site Number 5354, "Tambellup Gnamma", a water source site listed on the Permanent Register under Open Access. Location 237640/6236647
- Site Number 5738, "Tambellup", an artifact scatter site recorded on the Permanent Register under open access. Location 541640/6236647

The procedure <u>WEM-SWP-109 Heritage & Archaeology</u> applies to all Westforce Construction project sites on the measures taken to control and monitor cultural heritage impacts during site activities, including but not restricted to:

- Explain all requirements clearly during site induction to all employees and subcontractors
- Obtain the appropriate permits or authorisations prior to undertaking work
- Carry out pre-start checks of work zones to identify any potential cultural heritage artefacts, areas, trees, caves, buildings, etc.

If during construction, any unexpected historical, archaeological, paleontological or of aboriginal origin find (such as artefacts or bone or structures, etc.) appears, the following steps must be followed:

- Stop any work at the site of the find;
- Find location must be recorded and find immediately reported to the Site manager and to Enel's Archaeology Specialist;
- The discovered evidence and the surrounding area should be protected, and no one should have access to the area;
- Establish a no work zone around the discovery and mark all sensitive areas or protected areas in the field, using temporary bunting / fences / flagging tape or permanent fencing.
- Cultural heritage artefacts will not be moved and remain untouched, the area will be cordoned off to create a buffer zone a minimum of 25 meters around artefacts and no further disturbance will occur until it has been assessed by the client or an appropriate specialist.

#### 15.8 Contaminated Soils and Materials

Westforce Construction is committed to eliminate or minimise impacts upon the environment from contaminated soils and materials identified during project and other associated activities. The procedure <u>WEM-SWP-106</u> Contaminated Soils and Materials outlines the measures taken to control, monitor and measure contaminated soils and materials during activities performed by Westforce Construction in all its projects. The purpose of this procedure is to establish management measures to identify, treat, manage and/or dispose of contaminated soils and/or materials encountered during construction activities or created from construction activities, so as to minimise adverse effects on persons and the environment.

Contamination can also include but not limited to:

- Forms of rubbish or any aesthetically unsuitable materials that cannot be removed.
- Asbestos.
- Synthetic Mineral Fibers.
- Potential Acid Sulphate Soils.
- Actual Acid Sulphate Soils.

A review of the Australian Soil Resource Information System (ASRIS) online database indicates the FRWF Site is set within an area classified as having a 'low probability' (with a 'very low confidence') of Acid Sulphate Soil (ASS) occurring within 3 m of the ground surface. <a href="https://www.asris.csiro.au/index.html">https://www.asris.csiro.au/index.html</a>

A review of the Department of Water and Environmental Regulation (DWER) Contaminated Sites Database (accessed on 10 August 2022) indicates that there are no registered contaminated sites within 5 km of the Site. The database presents information on known contaminated sites that have been formally classified under the Contaminated Sites Act (2003) within one of the following categories: <a href="https://dow.maps.arcgis.com/apps/webappviewer/index.html?id=c2ecb74291ae4da2ac32c441819c6d47">https://dow.maps.arcgis.com/apps/webappviewer/index.html?id=c2ecb74291ae4da2ac32c441819c6d47</a>

- Contaminated remediation required (C-RR).
- Contaminated restricted use (C-RU).
- Remediated for restricted use (R-RU).

The database does not include information pertaining to sites classified as 'possibly contaminated – investigation required' or 'decontaminated'.

The Australian Map of Per and Polyfluoroalkyl Substances (PFAS) Chemicals (accessed on 10 August 2022) indicates that the Site is not recorded as a site of PFAS contamination, and no recorded sites occur within 5 km of the Site. <a href="https://pfas.australianmap.net/">https://pfas.australianmap.net/</a>

If contamination is discovered or caused during the project, no work is to commence at the affected area until approval is given by the client and the following actions is placed:

- Cease work in the vicinity of the contaminant
- Isolate/ Barricade off contaminated materials
- Notify Enel and DWER
- Manage the contamination and implement remediation as per DWER contaminated site guidelines, in line with principles agreed to with Enel and if required under the supervision and direction of the DWER
- Any contaminated soil shall be disposed of by licenced operators
- Identify soil/material/water classification/treatment and monitoring requirements
- Construct treatment area and establish monitoring program for treatment
- Carry out required treatment to contamination as per client and DWER guidelines
- Following treatment, monitor and test soil/material/water to ensure it meets disposal guidelines
- If soil/materials/water meets disposal guidelines, soil/material/water may be disposed or reused on site.

#### 15.9 Animals Hazards

Westforce Construction and sub-Contractors is aware of animal's risk, such as snakes, spiders and wild animals in the WHS-REG-015-C2448 Project Risk Register and is committed to implement all the reasonable measures to avoid risks

In spring (September, October and November) and summer (December, January and February), many reptiles emerge to bask in the sun. The species is diurnal. On hot days, activity occurs mainly in the morning and to a lesser extent in the afternoon. From September to February, WESTFORCE CONSTRUCTION will reinforce precautions to minimise the chance of accidents with snakes, which are an integral part of the natural environment and play an important role in wildlife ecosystems. In case of presence of wild dangerous animals Westforce Construction will take all the reasonable measure to avoid the risk, such as:

- Training on all the workers regarding the risk and the measures implemented
- Agreement with a trained snake catcher
- Use of appropriate PPE (Personal Protective Equipment)
- Conduct trench inspection before commencing of works due to the historic of snakes inside the open trenches in similar projects

### 15.10 Water Management

#### Site context

The project is located within the Gordon River Catchment system and does not occur in wetlands or creek lines, producing minimum impacts associated with both features. Environmental Impact Report, section 3.3 page 12, provides a summary of the hydrology within the proposed action development area. It states that although there are a number of defined drainage lines and gullies in the project area, there are no permanent watercourses. The largest of these drainage lines and gullies tend to carry surface flow for several months after winter rain and may form permanent pools over the summer and warmer months. EPBC Act referral states on Section 1, item 1.2 "All project works will avoid remnant vegetation and there will be no impact to waterways". Due to particular characteristics of watercourses in the project area, Westforce will determine the extent to which surface water monitoring is required. Construction-related impacts on a relevant stream will prompt water sampling.

Proposed parameters for water quality:

- **Temperature**
- Dissolved oxygen
- pН

- Conductivity
- Turbidity

#### **Procedure**

Westforce Construction is committed to eliminate or minimise impacts upon the environment from construction activities. The procedure WEM-SWP-108 Dewatering outlines the measures taken to control, monitor and manage the construction activities performed by Westforce Construction. Prior to the commencement of earthworks drainage (dewatering) operations; silt, sediment and erosion controls for the site will be carefully designed, planned and implemented in accordance with Enel approval.

The degree of silt, sediment, stormwater, erosion control and management required will depend on the following factors:

- Soil type soil slaking and erodibility characteristics.
- Rainfall regime seasonal rainfall and intensity of rainfall expected during the construction works.
- Slope lengths and angles steeper slopes with long exposed lengths must be carefully designed and controlled
- Existing drainage patterns and their ecological sensitivity
- Total area of exposed soil during works
- Ecological sensitivity of the waterway environment.

#### **Project Planning**

Earthworks drainage (dewatering) operations will comply with Enel and local regulatory requirements.

#### **Project works specific controls**

- Divert runoff into channels or cut-off drains
- Prevent stormwater entering excavations or intersecting stockpiles
- Dissipate energy and reduce water velocity to prevent scouring and erosion
- Minimise channel gradient and direct water flow away from or across slopes
- Direct water flow away from cleared areas and stockpiles
- Allow for on-site storage of water in ponds
- All stormwater from roads, stockpiles, hardstands and unsealed areas will be directed through sediment control structures prior to entry into storm water collection systems or natural waterways.
- Pump running hours and respective flow rates shall be measured daily and records provided to the Enel.

#### **Extracted stormwater and materials**

- Is deposited in approved area/pond and recycled for use at site. e.g. dust suppression;
- Is not deposited such that the water or materials is reasonably likely to re-enter excavations;
- Is not deposited in a manner that causes a nuisance or offensive condition.

#### **Corrective Actions**

Activity	Corrective Action	Responsibility
Instances where sediment / silt	Works will cease and corrective measures	Site Supervisors
control is not suitable	shall be implemented to remove detected	Environmental Advisor
	spillage as soon as practicable.	
Earthworks drainage (dewatering)	All identified earthworks drainage	Site supervisor
controls will be monitored visually	(dewatering) controls will be inspected	Project Engineers
by the Site Supervisors, Project	regularly by Site Supervisors, Project	Environmental Supervisor
Engineers and Environmental	Engineers and Environmental Advisor for	
Advisor to ensure they are	control deficiencies.	
effective.	Corrective and preventative actions to be put in place if any deficiencies are identified.	
Instances where procedures are	The Project Manager and Site Supervisors	Site supervisor
not being followed will be	(and Client if required) will review all	Site Supervisor

reported by the Site Supervisors to the Project Managers.	reported incidents relating to procedures and determine corrective or preventive actions required.	Project Engineers Environmental Supervisor
	Corrective and preventive actions will include: - Reinforcing legal responsibilities to personnel - Disciplinary action against personnel who repeatedly disregard earthworks drainage (dewatering) controls.	

# 15.10.1 Washing water of cement mixer truck

As a control measure, cement mixer trucks will only use a designated washout area located at the batch plant constructed to collect the wastewater for further treatment and/or disposal. Small concrete washouts will be at each turbine site for washing out the pumps and Westforce will remove the waste via skid steer and take it to a designated waste area located at the batch plant. Concrete waste from here will be disposed of offsite as required/ when nearing full.

All runoff from the batch plant area, including water from sealed or paved areas that may contain waste material, is directed to a settling pond for long enough to allow all particulate matter to settle and dry out for subsequent removal and disposed of in a licensed area.

All waste created during concrete batching or cement product manufacturing (including material removed from settling ponds or waste area at the batch plant will be recycled or disposed of at an appropriate licenced waste treatment facility.

Refer to Appendix E - Batch Plant and Layout.

#### 15.11 Hazard Substance Management

Westforce Construction is committed to eliminate or minimise impacts upon the environment from the use of hazardous substances during project and other associated activities. Working with hazardous substances shall be carried out in accordance with Westforce Construction <u>WEM-SWP-101 Hazardous Substance Management</u>, which outlines the measures taken to control, monitor and measure the use of hazardous substances during activities performed by Westforce Construction in all its projects.

The purpose of this procedure is to establish management measures to:

- Minimise potential for environmental harm by managing the delivery, storage and handling of hazardous substances
- Comply with relevant environmental and safety legislation regarding hazardous substance management
- Minimise the impact of our activities on the environment

As required by the legislation, Westforce Construction will:

- Maintain a Hazardous Substances Register of all hazardous substance used in the project
- Ensure that current SDS of each substance used are available on site
- Undertake risk assessments for those substances
- Obtain approval from Enel before bringing to the site
- Ensure spill kits, eye wash stations and an emergency shower will be available on site
- Use of portable bunds with a net capacity at least 120% of the net capacity of the largest tank.
- Ensure the purchase, transportation, storage, handling, use, disposal, and spill response of hazardous substances, including hydrocarbons, are in accordance with statutory requirements and also environmental obligations applicable to Enel.
- Use of suitable containers for transporting and storing each type of liquid
- Proper maintenance status of all containers

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- The loading, unloading and transfer of potentially polluting substances must always be carried in sealed areas with tarpaulins or containment vessels
- The fill level of containers should always be visible, in order to avoid overflows and any spillage of liquids
- Proper maintenance status of all pipes and pipelines and related connections for the transport of liquids
- Regular inspections and maintenance interventions on all equipment.

The Hazardous Substances Register shall be maintained in ChemAlert and copies of SDS's printed out and located where chemicals are stored or used. Westforce Construction will ensure this register and current SDS's are updated monthly. ChemAlert is Westforce Construction chemical management system to ensure correct controls and protections and it is accessible to HSE team.

#### 15.12 Worksite refueling area

A container fixed to the ground with a geometric capacity of 65,000 liters, and appropriate for containing hydrocarbons, will be set up at the dedicated vehicle refueling area within the site compound. The container is equipped with a containment and a protective hood made of non-combustible material and properly grounded.

Following AS 1940 – 2017 guidelines, the fueling area will be:

- Designated, clear and devoid of vegetation to avoid fire hazard.
- The separation distance from the tank to on-site protected places and protected places is in accordance with AS 1940 Table 4.1 Separation Distance from package stores to protected places. The minimum distance required is 6m for C1 class of liquid stored (combustible liquid).

Protected place definition according to AS 1940 is any of the following:

- a) A dwelling, residential building, place of worship, public building, school or college, hospital, theatre and anu building or open area in which persons are accustomed to assembling whether it is within or outside the property boundary of the installation.
- b) A factory, workshop, office, store, warehouse, shop, or building where persons are employed, that is outside the property boundary of the installation.
- c) Any storage facility for dangerous goods outside the property boundary of the installation, except for those defined as minor storages in this or other Standards of regulations.

On-site protected place definition according to AS 1940 is a building where people are employed within the property boundary, including offices, warehouses, manufacturing or processing areas, amenities and other dangerous goods stores where quantities exceed minor storage.

The area where the container will be installed is flat and the tank is self-bunded, incorporating a secondary layer into the design. A self-bunded tank, by definition, is a tank within a tank. The inner tank serves as the storage cell for the fuel and the outer tank serves as the spill or leak containment system. This is otherwise known as the 'bund'. The space between the inner and outer tanks serves as the bund and is 110% of the capacity of the inner tank eliminating the need for an external spill containment system.

Spills kits and fire extinguishers are installed in the vicinity of the container as safety and environmental control.

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Figure 3: Diesel tank

# 16 INSPECTIONS, MONITORING AND AUDITS

The environmental aspects are monitored on a regular basis through Westforce Construction workplace observations, inspections and during audits. Informal daily observations and formal weekly inspections are recorded on the site diary and on WEM-FM-002 Weekly Environmental Inspection Checklist respectively. Project audit will be conducted to review the implementation and compliance with the environmental management system and review practices to determine whether it complies with legislative requirements, established guidelines and best practices in environmental management.

#### 17 ENVIRONMENTAL INCIDENT RECORDING AND REPORTING

The Environmental Advisor is responsible for reporting and investigating environmental incidents that occur within the worksite. Any incident that directly impacts on any of the above environmental issues is to be reported immediately to the Environmental Advisor/ Site Supervisor who will then inform the Project Manager and notify the client. WHS-FM-003 Incident Investigation defines the processes used at Westforce Construction to ensure that HSE incidents are adequately managed and closed out. This procedure applies to any HSE incident and near miss involving Westforce Construction employees or subcontractors, whether resulting in or having significant potential for personal injury, damage and environmental harm.

Environmental incidents are reported on WEM-FM-001 Environmental Incident Notification.

# **18 REPORTING TO ENEL**

Westforce Construction HSE Advisor/ Environmental Advisor, Site Superintendent or delegate will notify Enel verbally of any incidents/accidents, near misses and stop work events immediately or as soon as possible.

Westforce Construction will submit a written notice to Enel within 6 hours of occurrence for any Relevant or High Potential Incidents, near misses or within 24 hours for Minor Accidents. The written notice shall include a detailed description of the event, all available preliminary information, and where relevant, the available medical prognoses and copies of any report filed with Governmental Authorities.

Within 3 calendar days from the occurrence of any Safety Near Miss, Safety Observation or Stop Work, Westforce Construction will submit a written notice to Enel reporting corrective/preventive measures adopted. Within 3 calendar days from the occurrence of any Relevant Accidents meaning Fatal Accidents, Life Changing Accidents and High Potential Accidents Westforce Construction will submit a preliminary report of the occurrence to Enel. within 7 calendar days, a report recording the detailed causes of the accident and the corrective/preventive measures adopted will be transmitted to Enel.

Westforce Construction will report all incidents and associated documents via Enel's incident reporting system/tool HSEQ4U.

# 19 REFERENCES

# 19.1 General Procedures

WHS-PR-003	Incident Management
WHS-PR-019	Hazard & Risk Management
WHS-PR-028	Legal and Other Requirements
WQA-PR-008	Communication, Consultation and Reporting
WQA-PR-001	Management System Document Control.
WQA-PR-007	Managing Project Documents and Data
WHS-PR-018	Change Management

#### 19.2 Registers

U	
WEM-REG-003	Cost Life Assessment
WQA-REG-009	Project Document Control Register.
WEM-REG-002	Waste Register
WHS-REG-012	Legal Register-Project
WQA-REG-002-C2448	Training Matrix
WHS -REG-015-C2448	HSE Risk Register

#### **19.3 Forms**

WEM-FM-001	Environmental Incident Notification
WEM-FM-002	Weekly Environmental Inspection
WEM-FM-003	Vehicle and Mobile Equipment Weed Hygiene Form
WQA-FM-015	Transmittal Advice

# 19.4 Environmental Working Procedures

WEM-SWP-101	Hazardous Substance Management
WEM-SWP-102	Flora and Fauna Management
WEM-SWP-103	Erosion and Sediment Management
WEM-SWP-104	Noise, Dust and Vibration Management
WEM-SWP-105	Waste Management
WEM-SWP-106	Contaminated Soils and Materials
WEM-SWP-107	Community Relations at the Worksite
WEM-SWP-108	Dewatering
WEM-SWP-109	Heritage & Archaeology

#### 19.5 Enel Documents

Enel Health, Safety and Environmental Terms – Second edition final

GPG\_AUS\_HSE\_GS\_001\_v.01 Technical Specification – Heath, Safety, Environmental requirements Australia

Exhibit D-1 Minimum Requirements of a Monthly Progress Report

EGPFR1WF Monthly HSE Data

Annex D - Socio-environmental data, KPIs and Dashboard - Consolidated 250922

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# **20 APPENDIX**

#### 20.1 Appendix A - Environmental Policy

#### **ENVIRONMENTAL POLICY**

Doc No: WEM-POL-001 Rev: 10

Issue Date: 01/03/2021

Review Date: 01/03/2023

This is a controlled document



At Westforce Construction, we recognise that the construction process has the potential to harm the environment through erosion, destruction of flora, damage to fauna habitat, hydrocarbon spills, pollution of waterways and the atmosphere and other intrusive activities. We understand that care for the environment must be an essential part of our business operations.

Westforce Construction commits to continual improvement of the Environmental Management System to enhance environmental performance and to protect the environment including the prevention of pollution. We integrate environmental management into all our work activities through the implementation of an ISO 14001 compliant Environmental Management System. Westforce Construction will ensure that we comply with the requirements of applicable legal requirements and with other requirements to which Westforce Construction subscribes that relate to our environmental aspects.

Our approach towards our commitment comprises of:

- Conducting formal risk assessments of potential environmental impacts caused by our activities and implementing measures to mitigate and reduce risks to an acceptable level;
- Planning, developing, implementing and monitoring relevant procedures to minimise any unfavourable environmental impact that may result from our business activities;
- Providing our employees and stakeholders with adequate and appropriate environmental training to develop a sense of responsibility for the protection of the environment;
- Collaborating with internal and external stakeholders on environmental matters through effective communication and consultation on environmental issues;
- Ensuring that our employees are informed of our policy and are aware of their environmental responsibilities in relation to the Westforce Construction business activities.

This policy is available to interested parties on Westforce Construction website.

This policy will be periodically reviewed, revised and republished where necessary to ensure it remains relevant and appropriate to the business of Westforce Construction.

Managing Director

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#### 20.2 Appendix B - Sustainability Policy

SUSTAINABILITY POLICY

Doc No: WEM-POL-002 Rev: 3

Issue Date: 01/03/2021

Review Date: 01/03/2023

This is a controlled document



At Westforce Construction, we acknowledge that social, economic and environmental sustainability is crucial to the long term success of our business. As a Civil Engineering and Construction company, we are playing a lead role in preserving the present and creating a sustainable future.

Westforce Construction is committed to integrating economic, social and environmental sustainable principles into our business through continual improvement of our sustainability performance, the use of environmental management plans and policies during all construction work, business and management reviews and ongoing education and training for our new and existing employees.

Our approach towards economic, social and environmental sustainability includes:

- The ongoing review of Westforce Construction business plans and targets, to ensure that we maintain our business quality, profitability and client satisfaction;
- Westforce Construction aims to provide job opportunities through apprenticeships for those entering the industry and ongoing training for our current employees;
- · The implementation of our Equal Opportunity Policy;
- Implementing Environmental Management Plans across all sites;
- Maintaining ISO 14001 accreditation;
- Engaging suppliers and subcontractors who apply sustainability principles;
- Increasing the use of recycled materials;
- Reduction and elimination of toxic and harmful substances used during construction;
- Recycling of construction waste and building materials after demolition and during construction;
- Pre-mobilisation sustainability targets and objectives;
- Post-completion review of sustainability practices implemented on site;
- Ensure that employees are informed of our sustainability polices and targets.

This policy will be periodically reviewed, revised and republished where necessary to ensure it remains relevant and appropriate to the structure and activities of Westforce Construction.

**Managing Director** 

01/03/2021

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# 20.3 Appendix C – Site Specific Fauna

# **FAUNA**





Western ringtail possum



Bandicoot



Baundin Black Cockatoo



Bilby



Brush-tailed Bettong Woylie



Brush-tailed Phascogale



Carnabys Black-Cockatoo

Quoll-Chuditch





Numbat



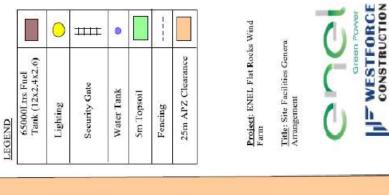
Red-tailed Black Cockatoo



Tammar

Western Brush Wallaby

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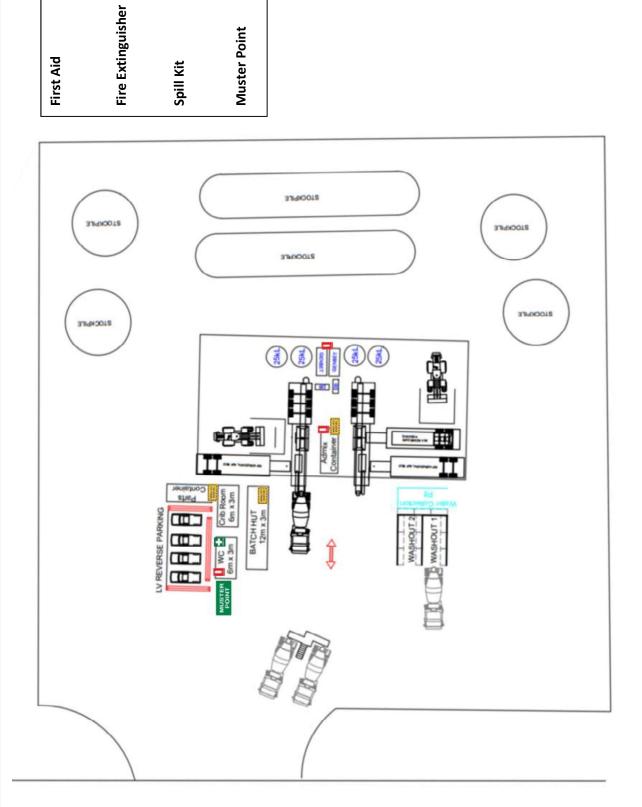
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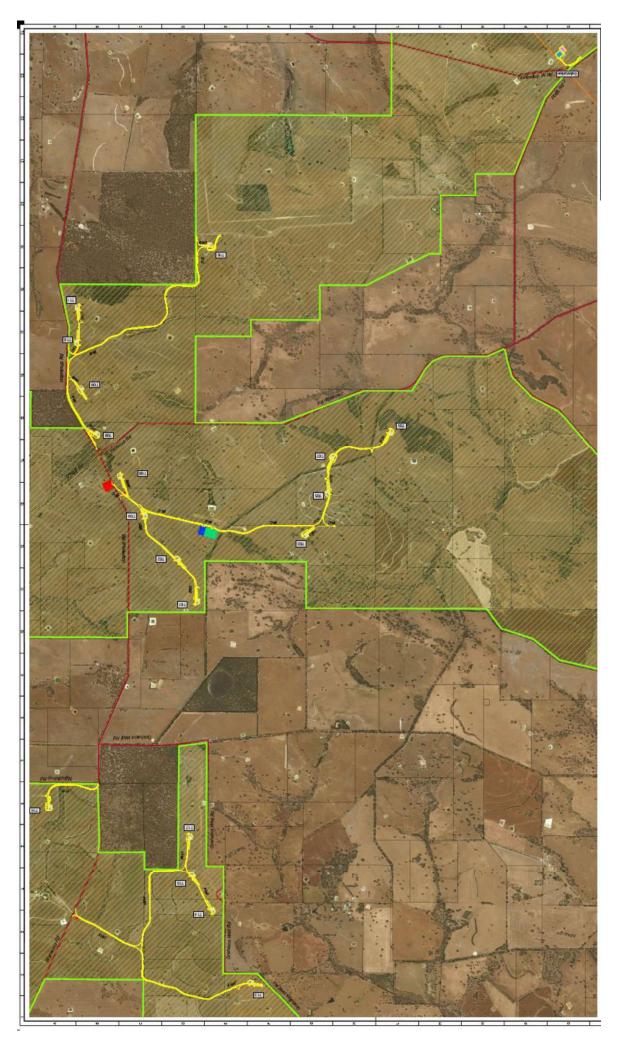
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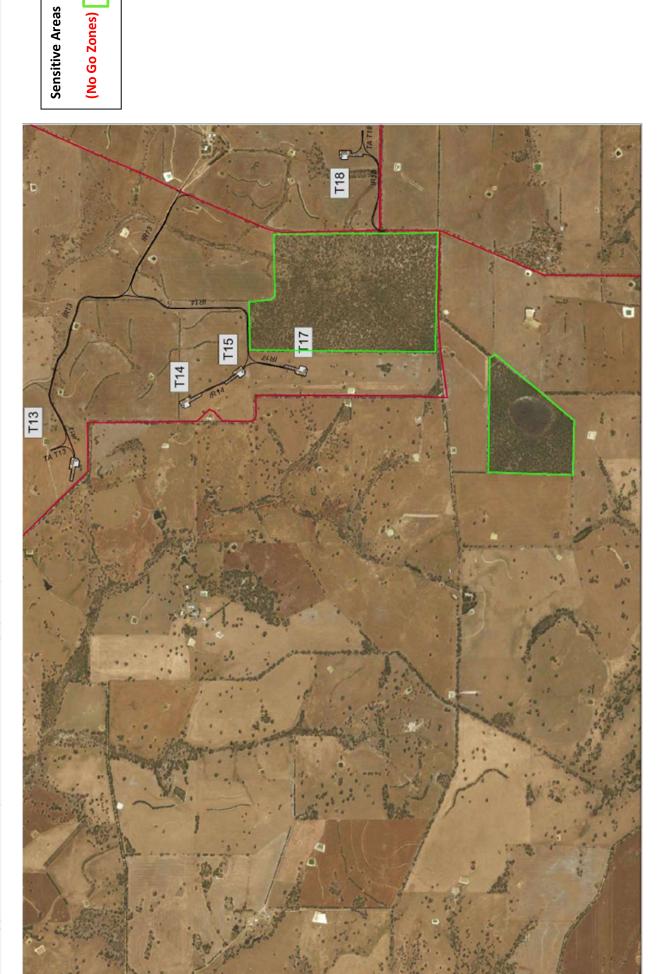
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