

Appendix D

Sydney Metro Environmental Incident and Non-compliance Reporting Procedure



Environmental Incident and Non-compliance Reporting Procedure

SM-17-00000096

Sydney Metro Integrated Management System (IMS)

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1. Purpose and scope

This procedure documents the process to be used when classifying and reporting Environmental Events.

This procedure applies to Sydney Metro and any contractor Sydney Metro engages to carry out works. Principal Contractors must ensure their processes for managing Environmental Events is consistent with this document. The requirement for consistency is documented in the Construction Environmental Management Framework (Section 3.3(f)) and shall be allocated as a contractual requirement to each delivery partner.

2. Introduction

Sydney Metro is committed to minimising risks to the environment, the rapid identification and rectification of breaches to Environmental Requirements and efficient and effective responses to Environmental Incidents that grows our ability to minimise harm and prevent future re-occurrences.

This procedure defines an approach to classifying Environmental Issues, Incidents and Non-compliances and establishes the immediate, interim and long term actions that are taken in response to Environmental Events.

3. Definitions

All terminology in this Procedure is taken to mean the generally accepted or dictionary definition with the following exceptions:

Term	Definition
Environment	means components of the earth, including: a) land, air and water, and b) any layer of the atmosphere, and c) any organic or inorganic matter and any living organism, and d) human-made or modified structures and areas, and includes interacting natural ecosystems that include components referred to in (a)-(c).
Environmental Event	An occurrence that identifies actual or potential environmental impacts or non-compliances. Events can include conversations, inspections, incidents, or failures of process.
Environmental Harm	Includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.
Environmental Incident	An occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred or is likely to have occurred.
Environmental Issue	An occurrence or set of circumstances where Environmental Harm or Non-compliance could occur if not rectified.
Environmental Non-compliance	A breach of an Environmental Requirement originating from Planning Approvals, Environment Protection Licenses, lease agreements, and other requirements documented in environmental management plans.

Term	Definition
Material Harm to the Environment	<p>harm to the environment is material if:</p> <ul style="list-style-type: none">a) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, orb) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), andc) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment. <p>It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.</p>

Terms and jargon specific to this procedure are defined within the [Sydney Metro Glossary](#).

4. Accountabilities

The Executive Director, Safety, Sustainability & Environment is accountable for this Procedure. Accountability includes authorising the document, monitoring its effectiveness and performing a formal document review.

Direct Reports to the Chief Executive are accountable for ensuring the requirements of this document are implemented within their area of responsibility.

The Direct Reports to the Chief Executive who are accountable for specific projects/programs are accountable for ensuring associated contractors comply with the requirements of this document if specified in the relevant contracts.

5. Environmental Events

Environmental surveillance data is relied upon to inform Sydney Metro of performance trends, to provide assurance that legislative requirements are being met and indicate where surveillance activities should be directed. In order to rely upon environmental data for this purpose there needs to be a high degree of consistency in the manner by which it is collected and interpreted. Due to the need for consistency, any incident/Non-compliance procedure produced by a delivery partner to Sydney Metro is required to be consistent with the requirements of this document.

The concept of Environmental Events forms a common starting point for understanding what types of occurrences should be managed and reported as Incidents and what should be reported as Non-compliances or Issues. When an Environmental Event occurs a series of questions can be asked to consistently determine what type of event it is. Commonly, Environmental Events lead to three different processes:

1. Reporting of an Environmental Incident;
2. Reporting of an Environmental Non-compliance; or
3. Reporting of an Environmental Issue.

Incidents and Non-compliances are recorded using the Environmental Incident and Non-compliance Report Form (SM ES-FT-403) and Environmental Issues are recorded through environmental inspection reports using the Environmental Inspection Information & Summary Form (SM ES-FT-406). These paper based records are subsequently entered into the Sydney Metro Compliance Register (Section 6.7) which is used to disseminate the data and facilities reporting internally and externally. Note where a Principal Contractor has submitted alternative processes and these have been approved by Sydney Metro they may also be used.

The figure below shows the process by which Environmental Events are classified (Figure 1).

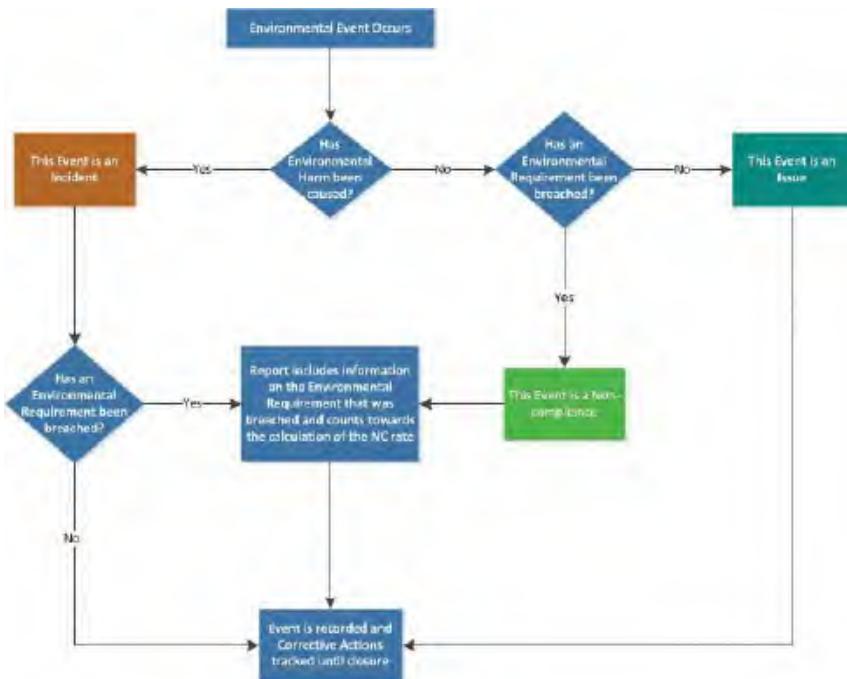


Figure 1: Environmental Event Classification Process

Where Environmental Harm has been caused the event will always be classified as an Environmental Incident regardless of whether one or more Environmental Requirements have been breached. Only when an event occurs without harm being caused to the environment will it be classified as a Non-compliance or Issue. It should be noted that the Incident management process still captures any breaches of Environmental Requirements and these incidents contribute towards the calculation of the NC Rate (Section 7.1).

This flowchart above is intended to be a guide and there may be situations where it is unclear exactly how an Environmental Event should be classified. In these situations a judgement call should be made in consultation with your Manager.

5.1. Worked Example – Classifying Environmental Events

This Section provides a fictitious example of Environmental Events which fall into each of the three different categories. The situations outlined below are provided to explain how event classifications are made. The background for these worked examples is as follows:

Sydney Metro is carrying out works in a newly established site and substantial earthworks are occurring to construct piers for an elevated viaduct. A nearby creek contains a variety of important fish species and the local community are known to use this creek for recreational fishing. The Environmental Impact Statement identified the creek as being at risk of increased sedimentation from dirty water run-off and the Conditions of Approval include a requirement to have a Progressive Erosion and Sediment Control Plan in place. This plan has been produced and indicates that sediment fences must be in place at specific locations to capture dirty water run-off. Regular daily inspections of the sediment controls are carried out by the contractor's Environment Manager and an Independent Environmental Representative has commenced a monthly inspection on this site at 7 am on Thursday morning.

5.1.1. Soil and Water Issue

The Environmental Representative notices a sediment fence has been knocked over in one of the areas indicated as requiring fencing on the ERSED plan. It appears to have occurred recently and there is no record of rainfall in the last few days. During the course of the inspection all other ERSED controls appeared to be in good condition and erected in accordance with the requirements of the Blue Book. In this example no harm has yet been caused and no environmental requirement has been breached so the event is classified as an Environmental Issue which is raised on the inspection report with an action to reinstall the fence.

5.1.2. Soil and Water Non-compliance

Alternatively, the Environmental Representative might have noticed many sediment fences had been knocked down and in some areas an absence of sediment fences where the plan indicates they are required. Despite there being no rain in recent days the Environmental Representative concludes that the requirements of the plan are not being followed and have been breached. The event is raised as non-compliance and actions are set in place to reinforce the requirements of the ERSED plan for that site's workforce as well as the immediate reinstatement of controls.

5.1.3. Soil and Water Incident

Finally, in a third scenario the Environmental Representative notices many sediment fences are down and some are absent where required by the plan. However, significant rainfall has occurred in recent days and the Environmental Representative determines that it is likely dirty water has escaped through the area into the nearby creek potentially causing harm to the fish population. This event is classified as an Incident by the inspector and immediate notification is undertaken. Similar controls are implemented as described above.

5.2. Notifiable Events

There are a number of Acts and regulations that include a specific requirement to notify a Regulatory Authority. When an Environmental Event triggers one of these notification requirements we then also refer to that event as a Notifiable Event (Table 1).

The Principal Contractor's Environment Manager must determine whether an event is notifiable, and may rely upon advice from Sydney Metro if it is provided.

Table 1: Examples of Notifiable Events

Event type	Legislation	Trigger for Notification
Pollution Incident ¹	POEO Act 1997	Part 5.7
	POEO (General) Regulation 2009	Section 101
Land contamination	Contaminated Land Management Act 1997	Section 60(1)
Discovery of an Aboriginal relic	National Parks & Wildlife Act 1974	Section 89A
Discover Aboriginal Remains	Commonwealth Aboriginal & Torres Strait Islanders Heritage Protection Act 1984	Section 20
Discovery of a relic	Heritage Act 1977	Section 146

5.3. Event Types

Each Environmental Event is assigned a secondary classification of an Event Type for the purpose of data analysis and general environmental management. They are grouped by areas of environmental management so that targeted auditing, training or awareness initiatives can be initiated in response to emergent trends. Each Event Type is explained in Table 2.

¹ Further information on reporting pollution incidents to EPA is provided in Section 6.6 Environmental Incident/Non-compliance Report

Unclassified

Table 2: Environmental Event Types and their descriptions

Event Type	Applies To:			Description
	Issue	Incident	Non-compliance	
Soil and Water	●	●	●	Covers the physical location, chemical composition and ecology of soils and waterways. Any event which changes these compositions is a Soil and Water event. Within this event type all instances of contamination, erosion and sedimentation of waterways is covered.
Flora and Fauna	●	●	●	Covers vegetation and vegetation communities as well as animals and animal habitat. Any event where vegetation is felled or damaged, animals are killed or injured, or habitat is harmed or destroyed is covered.
Waste and Spoil	●	●	●	Covers the management of Excavated Natural Material (ENM) and Virgin Excavated Natural Material (VENM) including on-site management, and disposal and also the classification and management of Waste materials. Note: that the transportation of spoil is covered under Traffic, Transport and Access.
Heritage	●	●	●	Covers the management of known heritage artefacts or sites, and the treatment of unexpected finds, archaeological investigations and other impacts.
Air Quality	●	●	●	Covers the management of emissions of particulate matter, odours, and gasses used as air quality parameters from worksites.
Noise and Vibration	●	●	●	Covers the management of airborne and ground borne noise and vibration and includes hold points on the commencement of any work where Out of Hours Works permits or Construction Noise Impact Statements are required.
Community Stakeholder and Business	●	●	●	Covers the management of Community and Stakeholder requirements and includes complaint response procedure, community management protocols, and the maintenance of information on websites.
Traffic Transport and Access	●	●	●	Covers the management of traffic inside and outside of sites including access points and parking requirements. This event type also covers any requirements in relation to vehicles and vehicle maintenance or the transportation of waste and spoil.
Spills and Leaks	●	●	●	Covers all instances where environmentally sensitive substances are held within a container which has the potential to leak or spill and covers pipes, hoses, fuel tanks, storage tanks and plastic containers. Note: Spills and Leaks specifically exclude anything in relation to the transport and deposition of sedimentation.
Management Systems	●	●	●	Covers procedural or administrate processes that are common across all areas. It specifically does not cover procedural or administrate processes which are unique to any of the other event types. For example, not completing a vegetation removal form prior to vegetation clearing is still a Flora and Fauna event. Note: A good example of a Management Systems NC would be not reporting an Environmental Incident within required timeframes.

6. Environmental Incident Classification and Management

Sydney Metro has defined an Environmental Incident as:

An occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred or is likely to have occurred.

Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items, or adverse community impacts.

Planning Approvals and Environment Protection Licences permit some environmental impacts and these are not intended to be captured as Environmental Incidents.

Table 3: Examples of Environmental Incidents

Type	Example Incident
Air Quality	Odour that travels beyond the site boundary
Air Quality	Dust exceeding reasonable levels without active management measures in place
Air Quality	Operation or maintenance of plant in a manner that causes or has likely caused excessive air pollution
Soil and Water	Discharge of water on or off site in a manner that causes or has likely caused water pollution without required approvals.
Noise and Vibration	Noise that travels beyond the site boundary as a result of poorly maintained plant or operation of plant in an inefficient manner
Noise and Vibration	Failure to comply with the approved hours of work
Soil and Water	Where the chemical composition of soil or water has been detrimentally modified by a contaminant leading to potential or actual environmental harm. For example, rainfall causes a flow of water across a site that erodes soil and enters a waterway increasing the total suspended solids of that water body.
Spills and Leaks	Where a substance has leaked from, or spilt from a container that is designed to prevent that substance from escaping into the environment (including bunds, fuel tanks, chemical bottles and other containers). Spills and Leaks specifically exclude anything in relation to the transport and deposition of sedimentation.
Soil and Water	Dispose of waste in a manner that harms or is likely to harm the environment
Flora and Fauna	Harm or “pick” a threatened species, endangered population or endangered ecological community without required approvals
Flora and Fauna	Damage to vegetation, fauna or habitat including watercourses without required approvals
Heritage	Damage, disturbance, destruction or works to heritage items/relics without required approvals
Heritage	Damage, disturbance, or destruction of Aboriginal objects or places without required approvals

6.1. Incident Classification

Environmental Incidents are classified into one of three Classes that are based upon the consequence descriptors for environmental risks in the Sydney Metro Risk Matrix (refer to [Sydney Metro Risk Management Standard](#)). Each of these classifications trigger a variety of management actions and/or legislative requirements depending on the severity of the consequence described where Class 3 represents minor consequences and Class 1 represents major consequences.

This matrix is further sub-divided into consequence ratings ranging from C6 (low impact) to C1 (high impact). An incident transitions between a Class 3 to a Class 2 incident once material harm has been caused, and transitions into a Class 1 incident once it is determined that the Environmental Harm caused in large-scale and cannot be remediated (Table 4).

Table 4: Classification System for Environmental Incidents

Class 3			Class 2		Class 1
C6	C5	C4	C3	C2	C1
No appreciable changes to environment and/or highly localised event	Change from normal conditions within environmental regulatory limits and environmental effects are within site boundaries	Short-term and/or well-contained environmental effects. Minor remedial actions probably required	Impacts external ecosystem and considerable remediation is required	Long-term environmental impairment in neighbouring or valued ecosystems Extensive remediation required	Irreversible large-scale environmental impact with loss of valued ecosystems

6.1.1. Class 3 Incidents

These Incidents are events which cause Environmental Harm, but do not cause Material Harm to the environment. Normally Class 3 Incidents are not Notifiable Events and therefore a simple notification protocol is adopted whereby Sydney Metro must be notified within 48 hours verbally, and in writing.

In some cases it will be unclear whether Material Harm has been caused in the early stages of Incident Management. If this is the case then the process for Class 2 Incidents is followed (see Section [Class 2 Incidents](#)) until it is clear that Material Harm has not been caused.

A formal Incident Investigation report is not required for Class 3 Incidents, however, it is expected that the person responsible for completing the Incident Notification Report makes appropriate enquiries to determine the likely causal factors involved and assigns effective corrective actions.

6.1.2. Class 2 Incidents

These Incidents are events which cause Material Harm to the environment and they always trigger notification of Regulatory Authorities. These Incidents represent events that are far more serious than Class 3 Incidents and therefore strict communication protocols are required to ensure that effective and informed decisions are made (Figure 2).

The Environmental Lead, contract Environment Manager and the Independent Environmental Representative must be notified verbally as soon as possible after the observer becomes aware of a Class 2 Incident.

Class 2 Incidents must be investigated and the investigation must produce an investigation report containing corrective or preventative actions. This investigation report must be provided to Sydney Metro within 7 days of the event unless another timeframe is agreed with the EL.

Despite any arrangements for the submission of investigation reports, an Incident Notification Report must be provided with all available information and submitted to Sydney Metro within 48 hours. It is not expected that initial Incident Notification Reports for Incidents under investigation initially include actions as these will be informed by the findings of the investigation. The report should be updated with actions resulting from the investigation when available.

6.1.3. Class 1 Incidents

Class 1 Environmental Incidents are managed in the same manner as Class 2 Incidents except where a determination is made by the Chief Executive (or delegate) that a Crisis Management Team should be activated. In this situation the [Sydney Metro Crisis Management Implementation Plan](#) is followed.

6.2. Incident Notification

When an Environmental Event occurs which causes Environmental Harm in all cases both verbal and written communication of the incident must be carried out immediately and within 48 hours respectively. For Class 1 and 2 Incidents the notification process shown in Figure 2 must be followed. Written communication of Environmental Incidents is via an Incident Notification Report (Section 6.3).

This process includes specific roles and responsibilities within Sydney Metro and our delivery Partners who are required to take notification actions in response to Incidents.

This notification process has been developed to ensure that crucial information about Incidents is captured early and communicated to specific individuals who can ensure the Environmental Impacts are minimised and efficient and effective responses to the event are implemented.

In particular the Principals Representative and the Environmental Lead for Sydney Metro play a crucial role in the communication of Incidents within Sydney Metro and these roles are explained in more detail below.

6.2.1. Principal's Representative (PR)

Each works package establishes a contractual interface for communication between the contracted party and Sydney Metro. Generally this interface is between the Principal Contractors Project Director and an appointed representative of Sydney Metro called the Principals Representative.

All formal written communications must pass between these two individuals electronically using TeamBinder. The Principals Representative holds certain responsibilities in the Incident management Process outlined in Figure 2.

6.2.2. Environmental Lead (EL)

Where this procedure is applied to a works package an Environmental Lead (EL) will be selected for the relevant works package. The Environmental Lead must possess environmental experience and competency in managing Incidents and be a representative of Sydney Metro for those works. This representative holds specific responsibilities outlined in Figure 2.

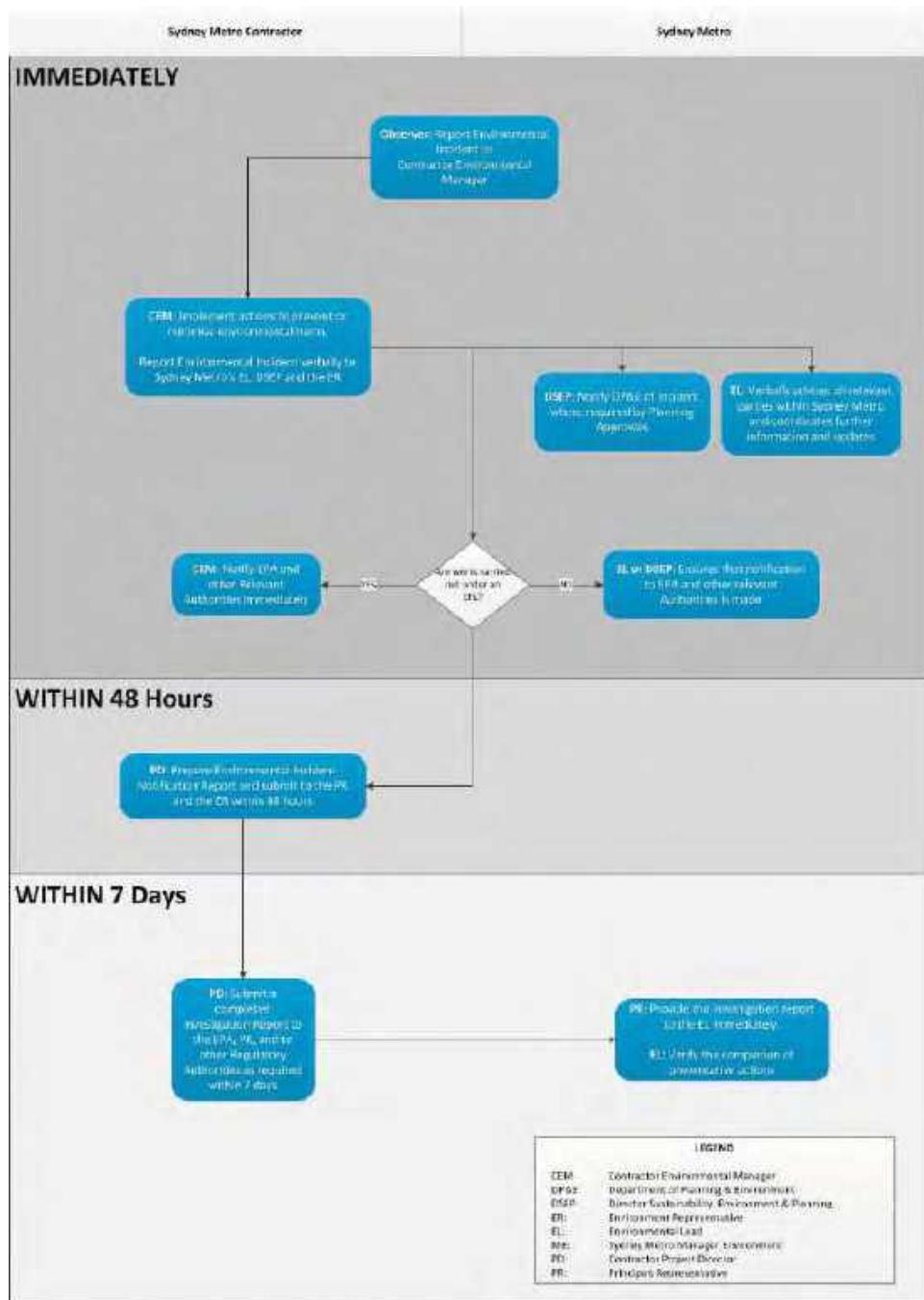


Figure 2: Environment Incident notification process for Class 1 and 2 Incidents

6.3. Incident Notification Reports

For all Incidents an Incident Notification Report must be completed and submitted to Sydney Metro within 48 hours. These reports satisfy the requirement for written communication to Sydney Metro and are completed using the Environmental Incident and Non-compliance Notification Report (SM ES-FT-403) or a similar and consistent form approved by Sydney Metro.

6.4. Incident Investigations

Environmental Incident Investigations must be carried out for all Class 1 and Class 2 Incidents. Investigations may also be requested for any other Environmental Event at the discretion of Sydney Metro. This discretion is likely to be exercised where incidents of a similar nature are occurring repetitively.

When conducting an Environmental Incident investigation, they must:

- Be led by a lead investigator who is suitably independent investigator capable of arriving at objective findings and is experienced in conducting environmental incident investigations;
- Consider the need for legal privilege during the investigation process in consultation with legal counsel;
- Be informed by all available information that is relevant to the investigation;
- Analyse the timeline of events which led up to and followed the occurrence of Environmental Harm including the immediate incident response;
- Be conducted in a manner that is consistent with recognised investigation techniques such as ICAMS;
- Gather and record evidence;
- Seek the input of key stakeholders; and
- Identify Preventative and Corrective actions and document these in the Incident Notification Report.

6.5. Environmental Incidents with Health and Safety Impacts

It is possible that where an Event occurs that causes Environmental Harm, harm is also caused to the health, safety or wellbeing of people. In these situations there will also be a Health and Safety Incident process undertaken which is separate to the process outlined in this document.

While the definition of the Environment covers people under the POEO Act, the management of impacts upon them are carried out using the Health and Safety Incident Management protocols. This is because Health, Safety and Wellbeing requirements are governed by a range of legislation other than the POEO Act and this procedure is not comprehensive in that regard. Sydney Metro has well established processes to manage impacts on people without the need for the Environmental Incident Process to intervene.

Furthermore, where Environmental Events cause harm to both the ‘environment’ and people it is possible that the root causes for the respective impacts are different. It is also possible that differences in the severity of the impacts trigger inconsistent notification requirements and investigation levels. It is prudent to identify appropriate and effective corrective actions that reduce the risk of impacts to both people and the environment, therefore separate Incident Management Processes are undertaken in these situations.

For more detail on the management of Health and Safety Incidents please refer to the [Health & Safety Incident Reporting & Investigation Standard \(SM-17-00000040\)](#).

6.6. Reporting Pollution Incidents to Relevant Authorities

If an Incident or Non-compliance is a Notifiable Event, then a report must be provided to the relevant Regulatory Authority within the timeframe(s) specified by the relevant legislation. Pollution Incidents which are causing or threatening Material Harm to the environment must be reported to each of the following authorities immediately after project personnel become aware of the Incident, as required by Section 148 of the POEO Act 1997. The contact numbers for these authorities are listed in Table 5.

Table 5: Contact details for Relevant Authorities

Type	Example incident
EPA Environment Line	131 555
Local Authority	Local Council (specific to area)
Ministry of Health	Public Health Unit (refer to http://www.health.nsw.gov.au/Pages/default.aspx to confirm local area contact details)
SafeWork NSW	131 050 or contact@safework.nsw.gov.au
Fire and Rescue NSW	000

Relevant information required to be given to EPA when making a notification is specified in Section 150 of the POEO Act 1997 as follows:

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

All relevant information known at the time of making the notification must be reported. If the information required by (c), (d) or (e) above is not known at the time of initial notification but becomes known afterwards, it must be reported to each authority immediately after it

becomes known. Verbal notification must be followed by notification in writing within seven days of the date on which the Incident occurred.

Pollution Incidents are not required to be reported if the Incident has already come to the attention of the EPA or the Incident involves only the emission of an odour.

Failure to report a pollution Incident as required by the POEO Act 1997 is an offence.

Where any work or activity is regulated by an Environment Protection License (EPL), notification of a pollution Incident to the EPA should be made by the licensee. Thus, where the contractor holds the EPL for the project, notification to EPA shall be made by the contractor.

For any work or activity that is not regulated by an EPL, notification of pollution Incidents to EPA shall be made by Sydney Metro, unless the contractor is instructed otherwise by Sydney Metro. This includes pollution Incidents that occur as a result of pre-construction activities which may be undertaken prior to an EPL being required for a project. Pre-construction activities are determined by the Planning Approval and may include, for example, geotechnical investigations or surveys.

Where the Environmental Representative determines there to have been a significant off-site impact on people or the biophysical environment, the program Director Sustainability Environment and Planning will notify the Secretary of the Department of Environment and Planning within 48 hours in accordance with Project Infrastructure Approval Conditions. This notification will be followed by a full written report within seven days of the date on which the incident occurred.

6.6.1. Maritime Related Incident Notification and Reporting

Marine Incidents involving vessels and personnel on board vessels must be reported to the Australian Maritime Safety Authority in accordance with the guidance published on their website at:

- [Australian Maritime Safety Authority Incident Reporting](#); and
- [Reporting obligations of owners and masters of domestic commercial vessels](#).

6.7. Environmental Compliance Register

The Environmental Compliance Register is used to manage the information associated with reporting of Environmental Events. This register is maintained by the Manager Environment and may be used by a variety of individuals to input data. For access to the register or information on its use contact the Manager Environment.

This register analyses the data it contains and produces environmental compliance statistics that are used to meet a range of reporting and environmental management requirements.

7. Environmental Non-compliance

An Environmental Non-compliance is a breach of an Environmental Requirement originating from Planning Approvals, Environment Protection Licenses, lease agreements, and other requirements documented in environmental management plans. It is important to note that regardless of whether an event is classified as a Non-compliance or an Incident the process behind managing the event remains the same, with the following exceptions:

- Non-compliances are not notifiable to Regulatory Authorities under the POEO Act;
- Non-compliances are reported to have occurred on the day the breach was raised as opposed to the date when the requirement was breached (this is to preserve historical reporting and analysis – see Section 7.1);
- Non-compliances are not divided into severity classes (Section 5.2);
- Non-compliances do not have the potential to trigger crisis or emergency management processes; and
- There is an informal notification process in the immediate timeframe following a Non-compliance being raised.

When an Environmental Event occurs that causes Environmental Harm and also breaches one or more Environmental Requirements, then an Incident Notification Report will be created which records what requirements were breached.

If a Non-compliance is identified then it must be raised using the Environmental Incident and Non-compliance Report Form within 48 hours by the party responsible for the breach.

7.1. Non-compliance Rate

A key environmental performance statistic used by Sydney Metro is the Non-compliance Rate. This statistic provides a standardised way of comparing the performance of different projects or contractors. The NC Rate is calculated using the following formula:

$$= \frac{(NCs + Incidents\ with\ breaches\ raised\ in\ month) + (Open\ NCs + Open\ Incidents\ with\ breaches\ from\ previous\ months)}{Total\ Number\ of\ Ongoing\ Requirements} \times 100$$

Each month a count of the number of NCs raised, and Incident raised where Environmental Requirements have also been breached is counted. Added to this number is the number of these events which were raised in previous months that still held an Open status in the current reporting period. Non-compliance and incident Events are considered Open if any of the associated Actions are Open. The total is divided by the number of Environmental Requirements which are actively being complied with (Ongoing Requirements) and a multiplying factor of 100 is applied.

8. Corrective and Preventative Actions

Whenever an Environmental Event is raised actions will be assigned to the event irrespective of whether it is an Issue, Incident or Non-compliance. These actions will generally be Corrective Actions which are implemented to eliminate the cause of the Incident, Non-compliance or Issue and can be thought of as reactive measures in response to the Environmental Event.

Preventative Actions may also be assigned to prevent the occurrence of an Incident, Non-compliance or Issue and can be considered pro-active measures which may be recommended following a detailed investigation of the event.

Actions must:

- Limit impacts as far as is reasonably practicable;
- eliminate risk where practicable;
- where is it not practicable to eliminate the risk, follow the hierarchy of controls;
- address root causes and contributing factors; and
- be prioritised based on risk.

The Executive Director, Safety Sustainability & Environment must ensure there are systems in place to:

- monitor corrective action status;
- escalate issues to the executive where progress on a corrective action is inadequate; and
- retain all corrective action responses for recording purposes.

8.1. Action Status

Actions are allocated to a person who will take accountability for ensuring it is carried out within a timely manner and completed by the due date.

Actions are either closed immediately if the Action has already been carried out and verified by Sydney Metro, or are created with an open status. The Action will remain in an open state until such a time as Sydney Metro verifies that the responsible person has completed the Action in a satisfactory manner. Until all actions associated with an Incident, Non-compliance or Issue are closed the original Environmental Event is considered to be open as well. This is relevant when calculating the NC Rate as open Non-compliances and Incidents contribute toward the calculation of this statistic.

Verification is determined by the Environmental Lead by sighting evidence of the Actions implementation.

9. Related Documents and References

Related Documents and References

- [Environmental & Sustainability Management Manual](#)
- [Risk Management Standard](#)
- [Health & Safety Incident Reporting & Investigation Standard \(SM-17-00000040\)](#)
- [Crisis Management Implementation Plan](#)
- [Environmental Incident and Non-compliance Notification Report](#)
- [Environmental Inspection Information & Summary](#)
- [Sydney Metro Glossary](#)

10. Superseded Documents

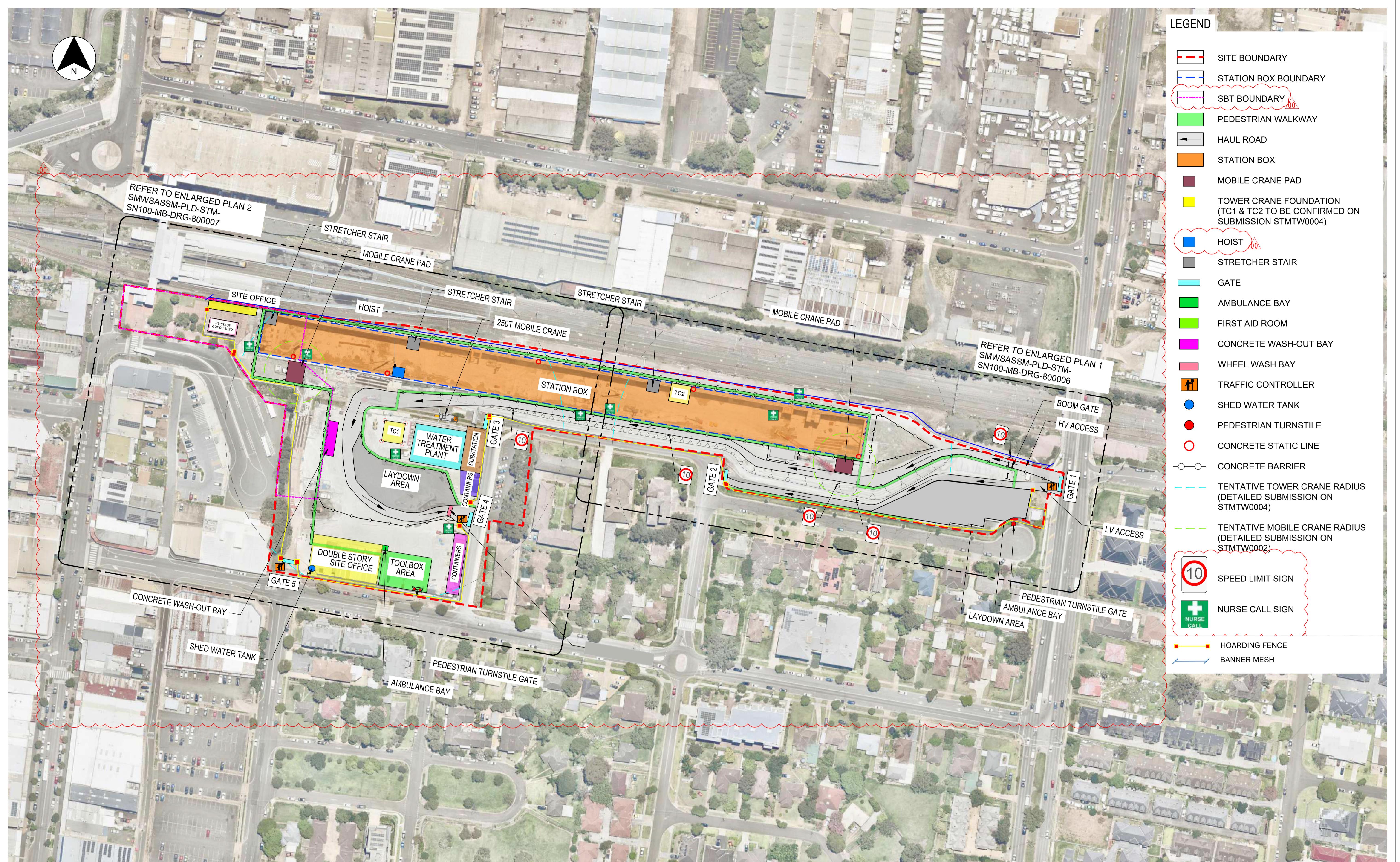
Superseded Documents

There are no documents superseded as a result of this document.

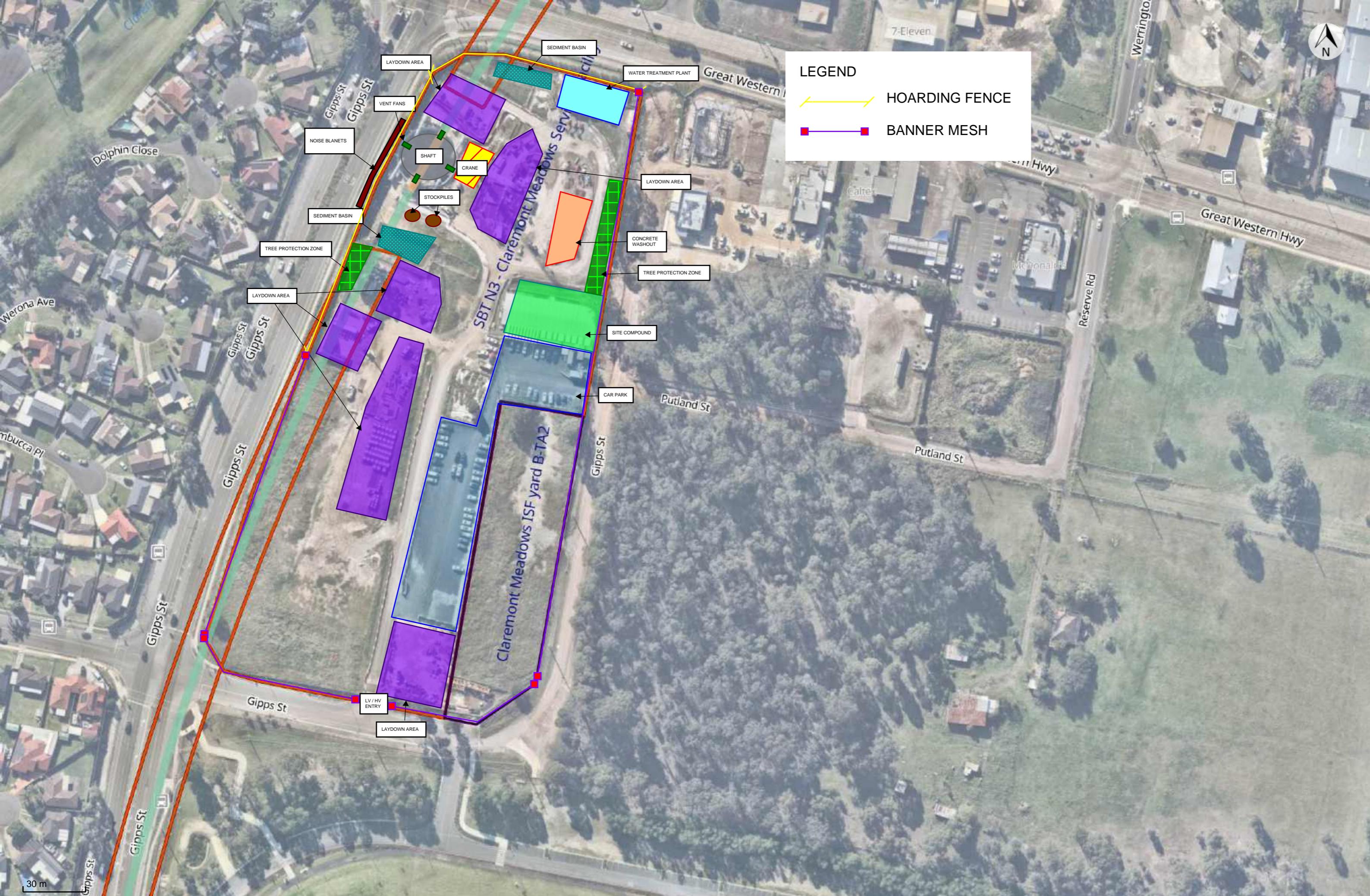
11. Document History

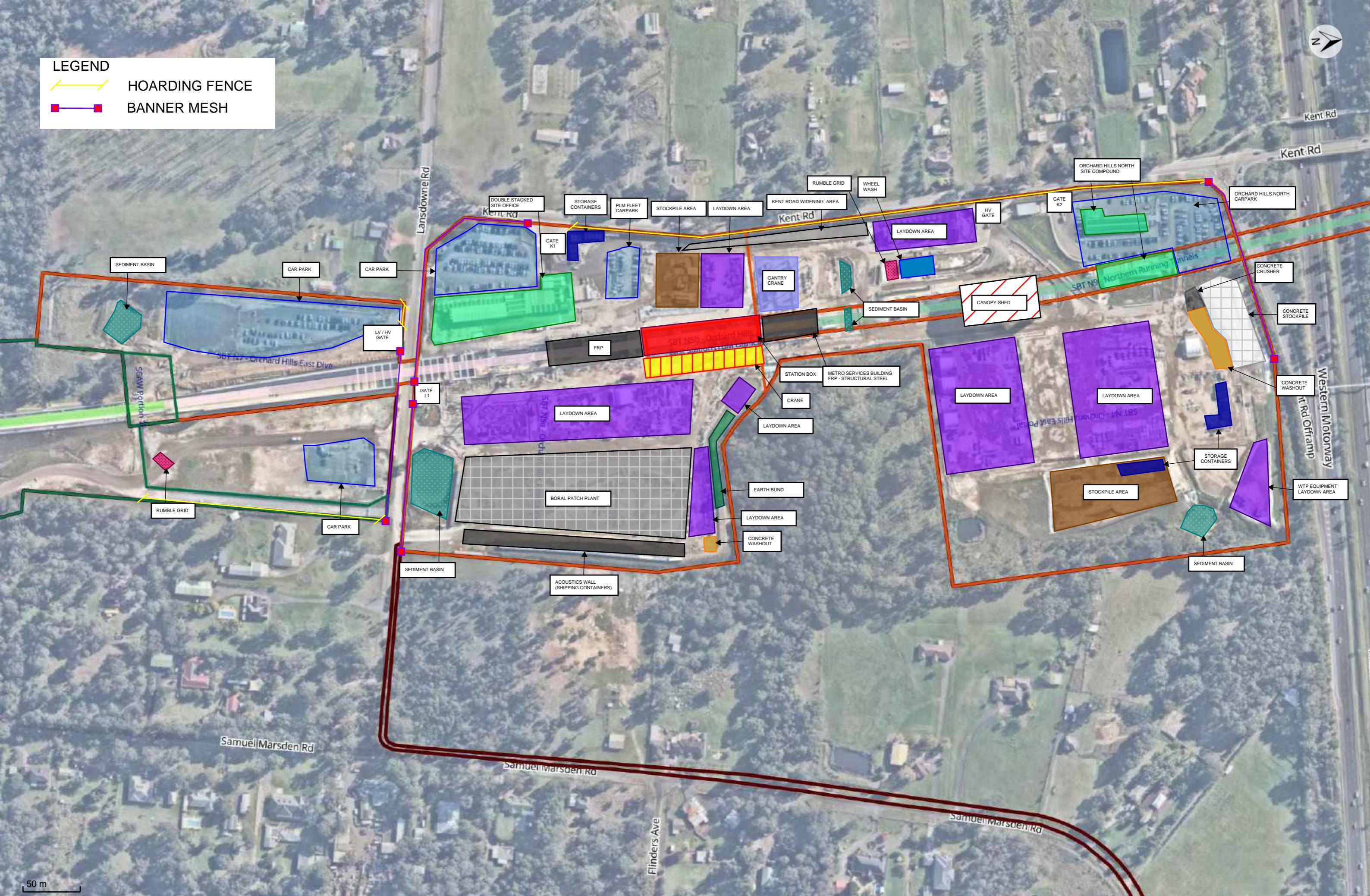
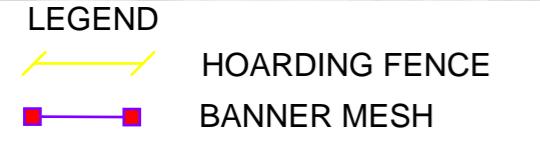
Version	Date of approval	Notes
1.0	31 March 2015	New document
2.0	7 July 2016	IMS Review
3.0	7 April 2017	IMS Review
4.0	23 November 2018	IMS Review
5.0	11 February 2019	IMS Review
5.1	18 February 2019	Minor correction to formula

Appendix E Indicative Site Layouts (Ancillary Facilities)



FOR CONSTRUCTION







LEGEND

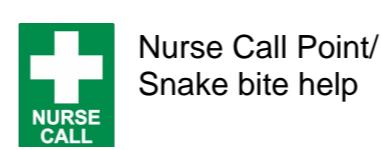
- LV and HV Access ROAD
- Track Welding Area
- FRP Working Area
- Earthworks Working Area
- Buildings Working Area
- Drainage Working Area
- Trunk Services Working Area
- CSR Working Area
- Miscellaneous Buildings
- Exclusion Zone
- Restricted Zone



ONE-WAY
EMERGENCY



TOILET
FIRE EXTINGUISHER



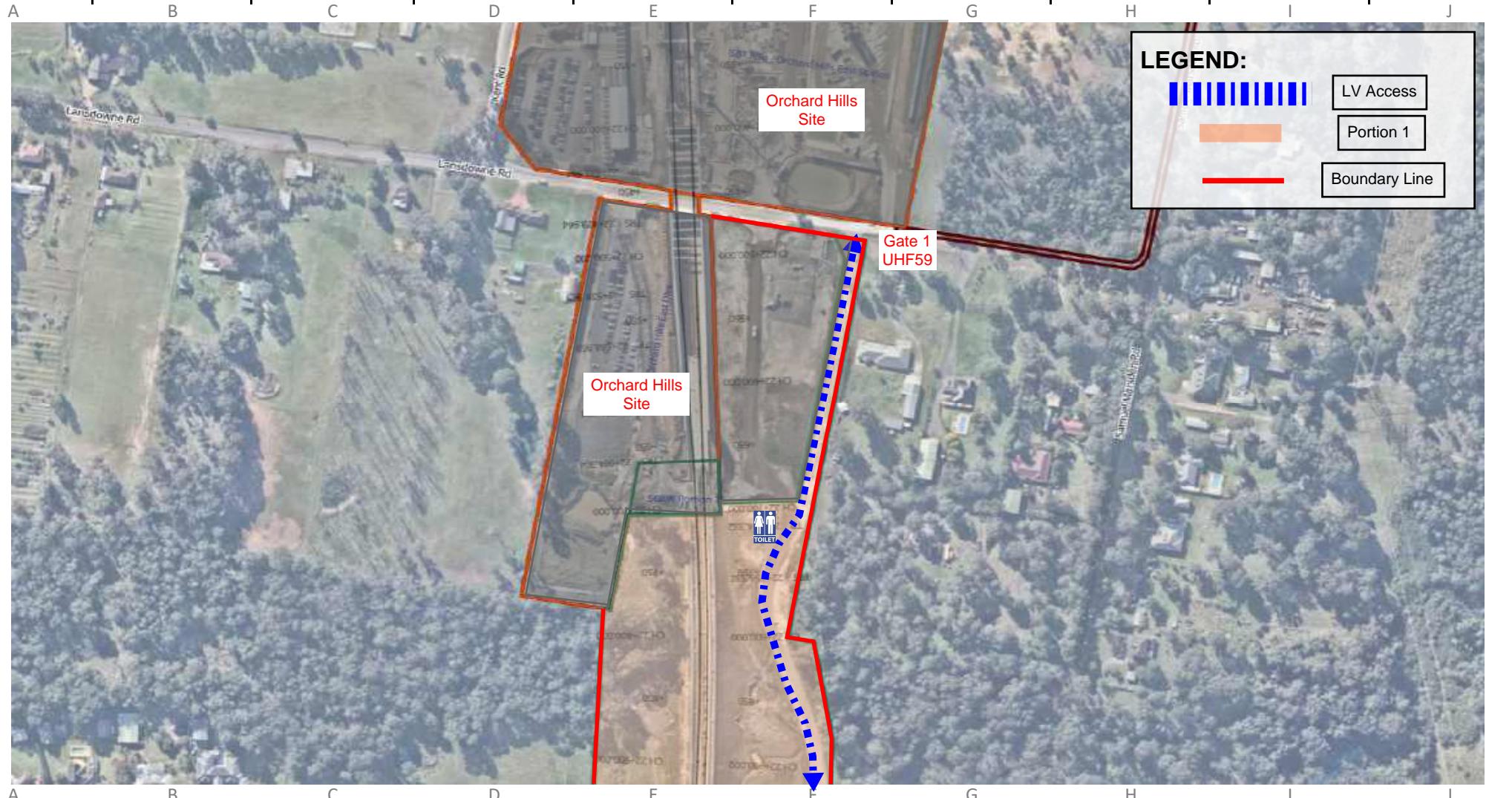
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SMF SITE LAYOUT PLAN

SSTOM

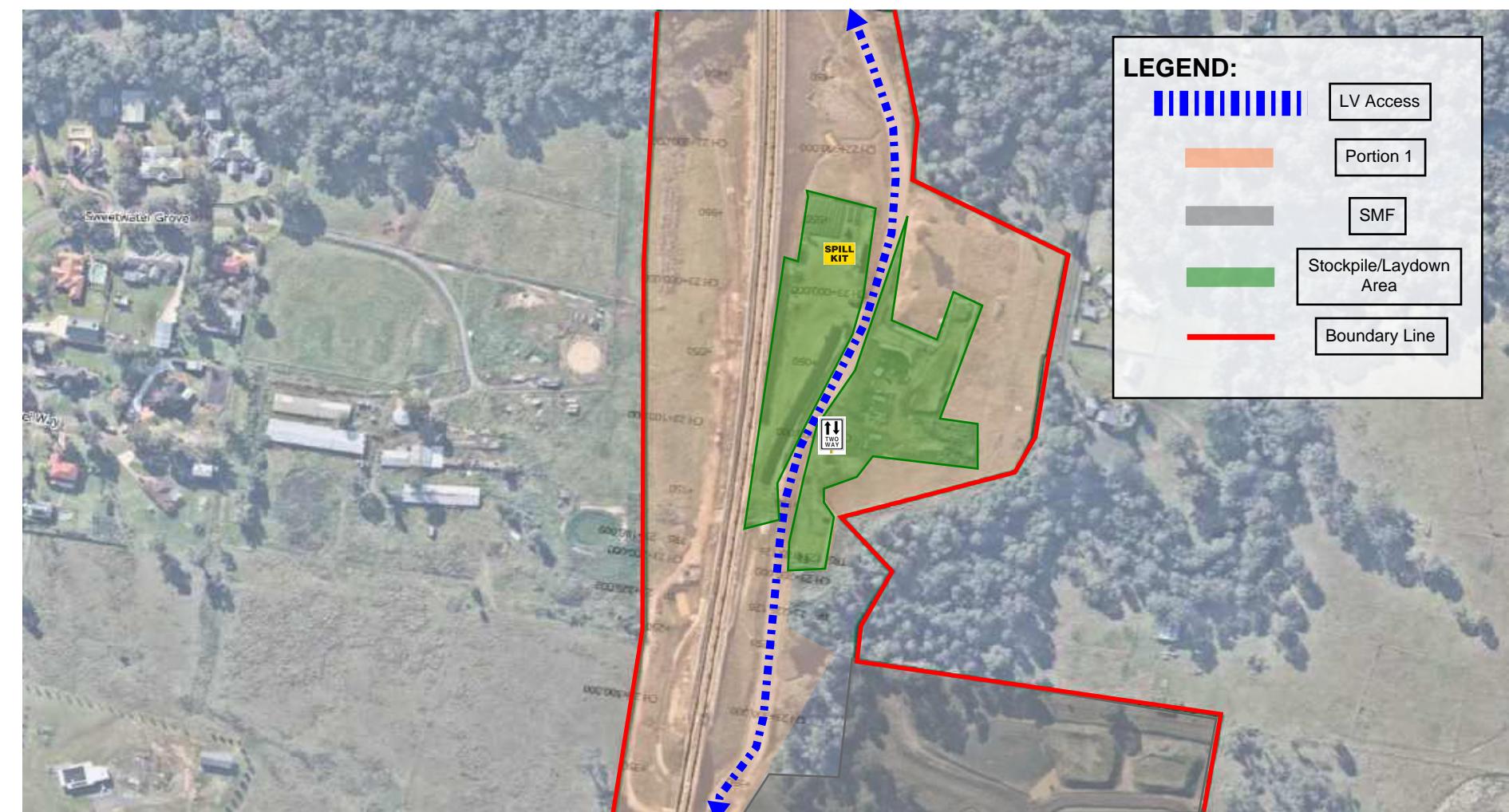
[Map link](#)

Datum / Projection: GDA2020 / MGA zone 56



SITE LAYOUT PLAN

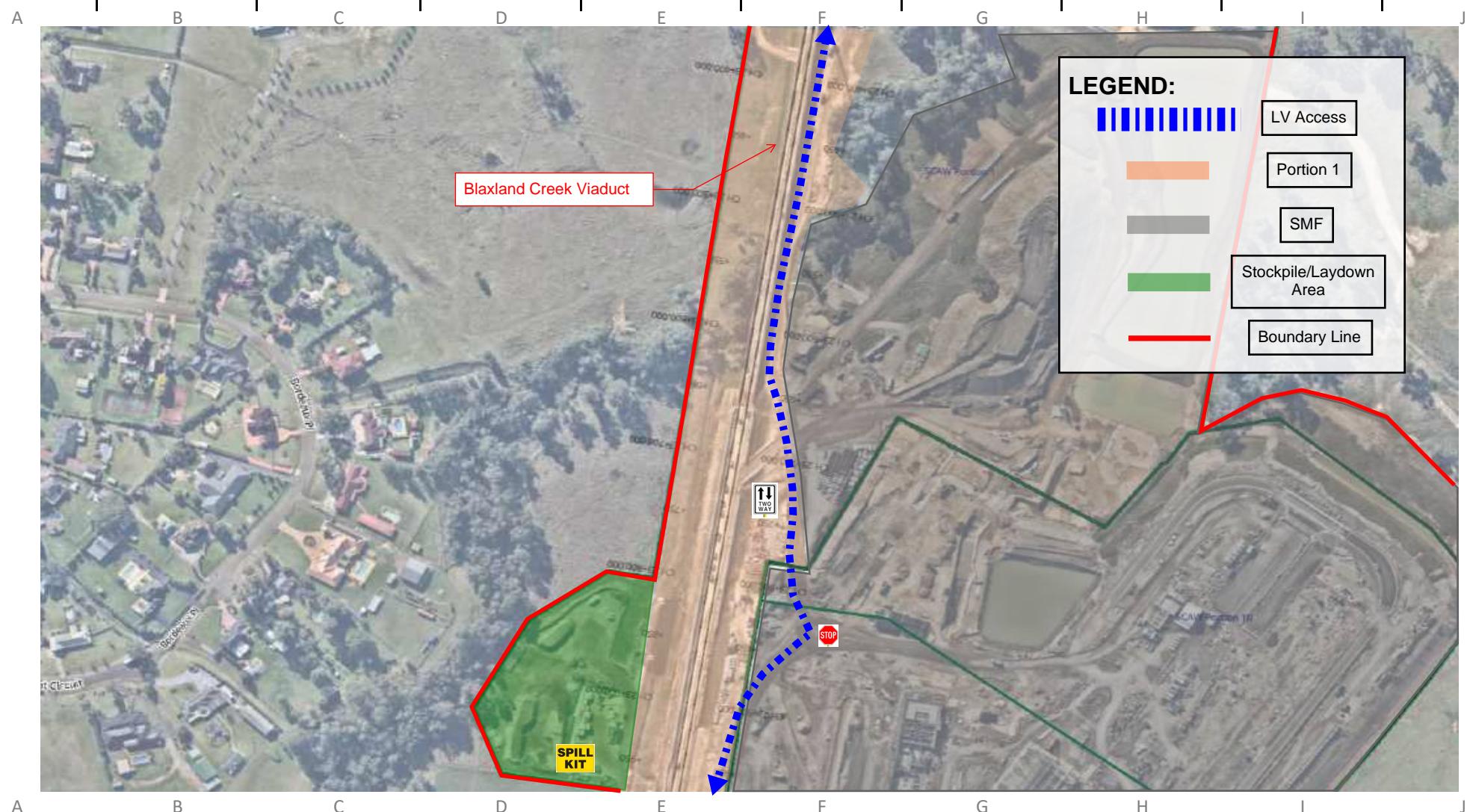
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SITE LAYOUT PLAN

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16/09/2025	00

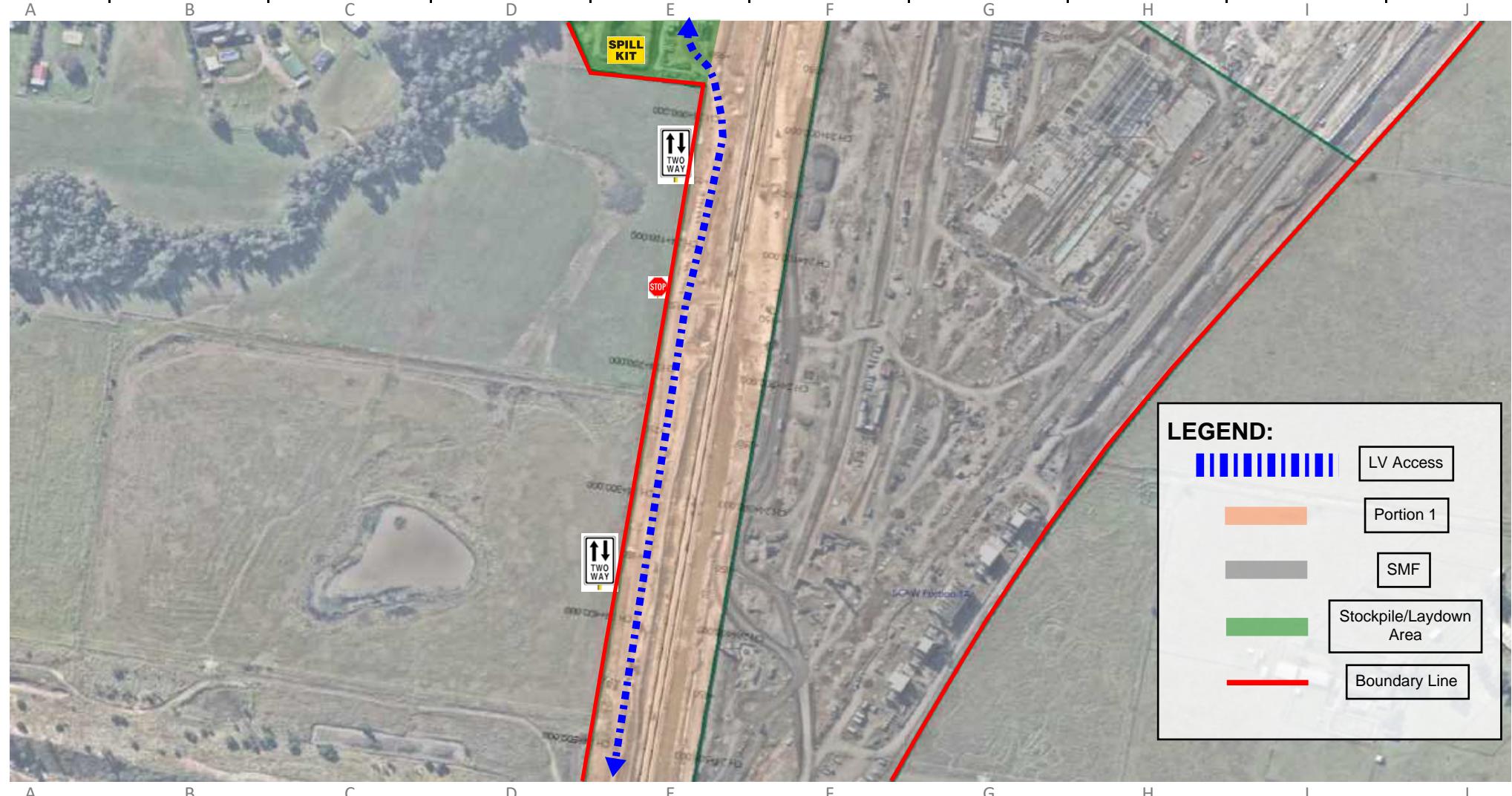
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SITE LAYOUT PLAN

DATE	REV.
16/09/2025	00

SHEET 3



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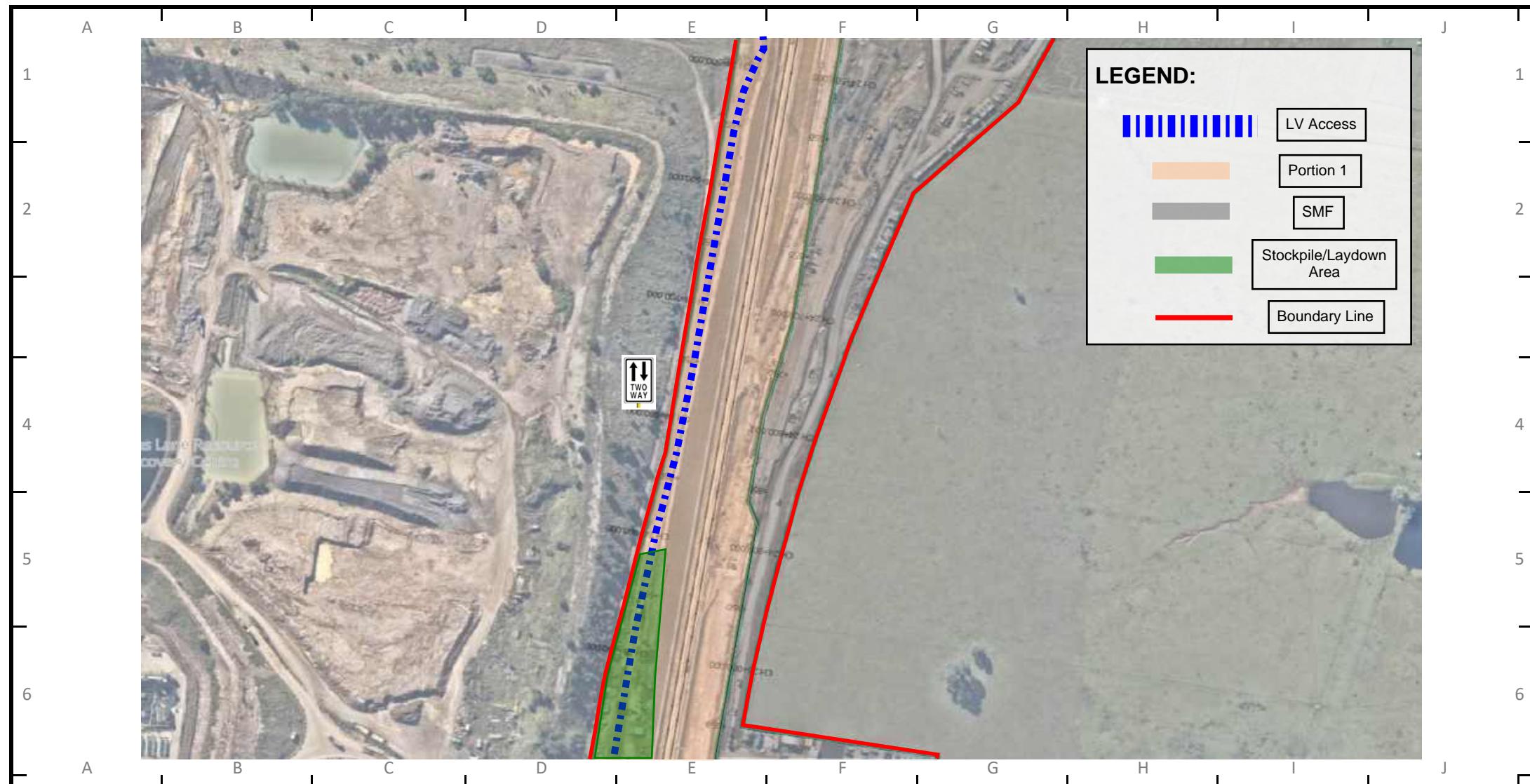
LV Access	Blue dashed line with vertical bars
Portion 1	Orange shaded area
SMF	Grey shaded area
Stockpile/Laydown Area	Green shaded area
Boundary Line	Red solid line



SITE LAYOUT PLAN

DATE	REV.
16/09/2025	00

SHEET 4



SITE LAYOUT PLAN

DATE	REV.
16/09/2025	00

SHEET 5



Delivery Driver Instructions:

- CALL UHF#59 FOR GATE 2
- Site compliant PPE must be worn by drivers when outside cab on site (long sleeve shirts & pants, steel cap boots, helmet, glasses)
- No access outside of standard work hours: Monday - Friday: 7am - 5pm, Saturday: 8am - 1pm
- All visitors must sign in at site office
- All HV vehicles are not permitted to turn right on Luddenham Road**
- Please refer to haulage route map to ensure you are only travelling on approved haulage routes as part of the project Overarching CTMP

LEGEND:

	LV Access
	Parking
	Portion 1
	Boundary Line
	Site Sheds & Ablutions
	Stockpile/Laydown Area

A

B

C

D

E

F

G

H

I

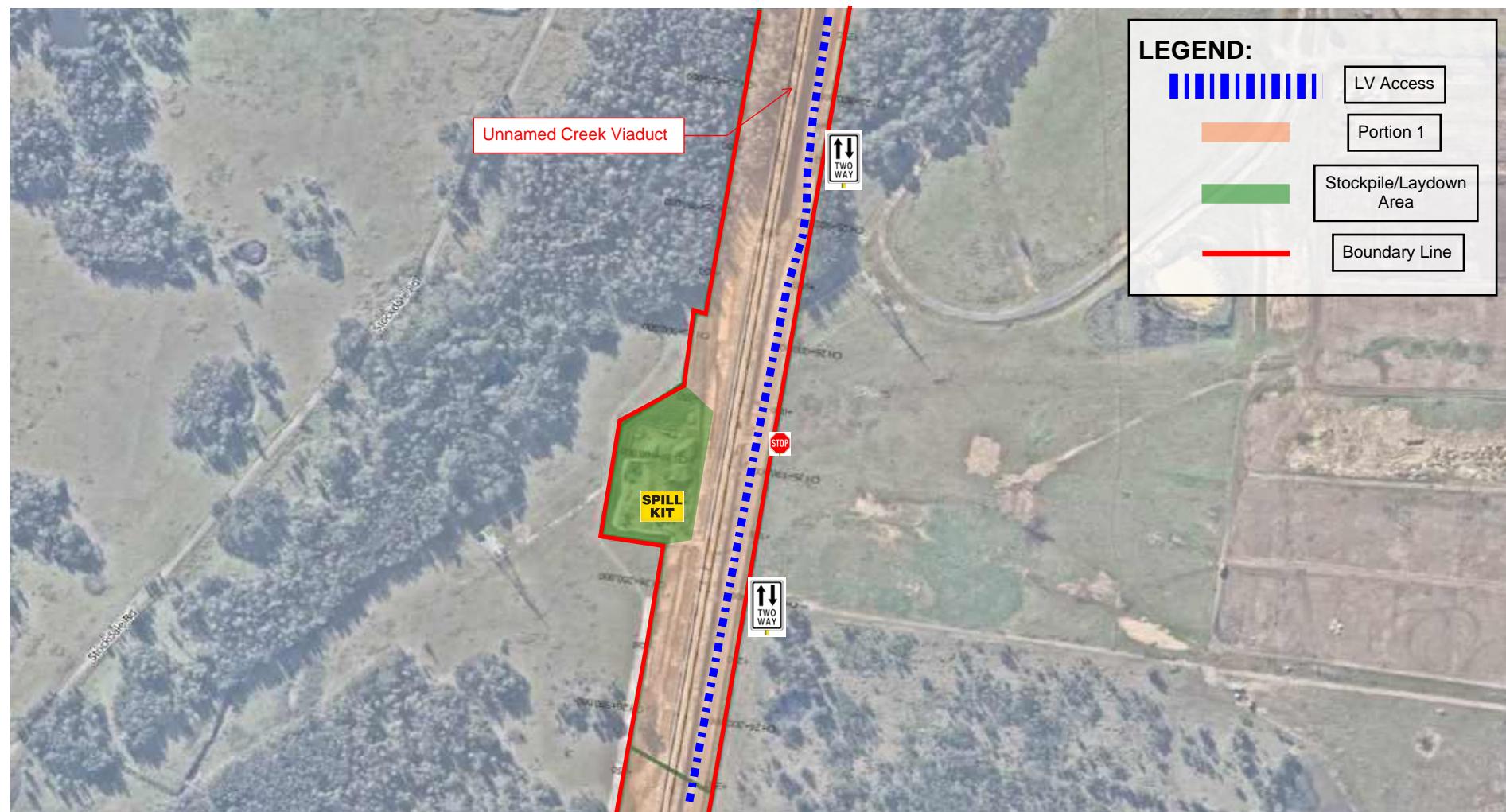
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SITE LAYOUT PLAN

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16/09/2025	00

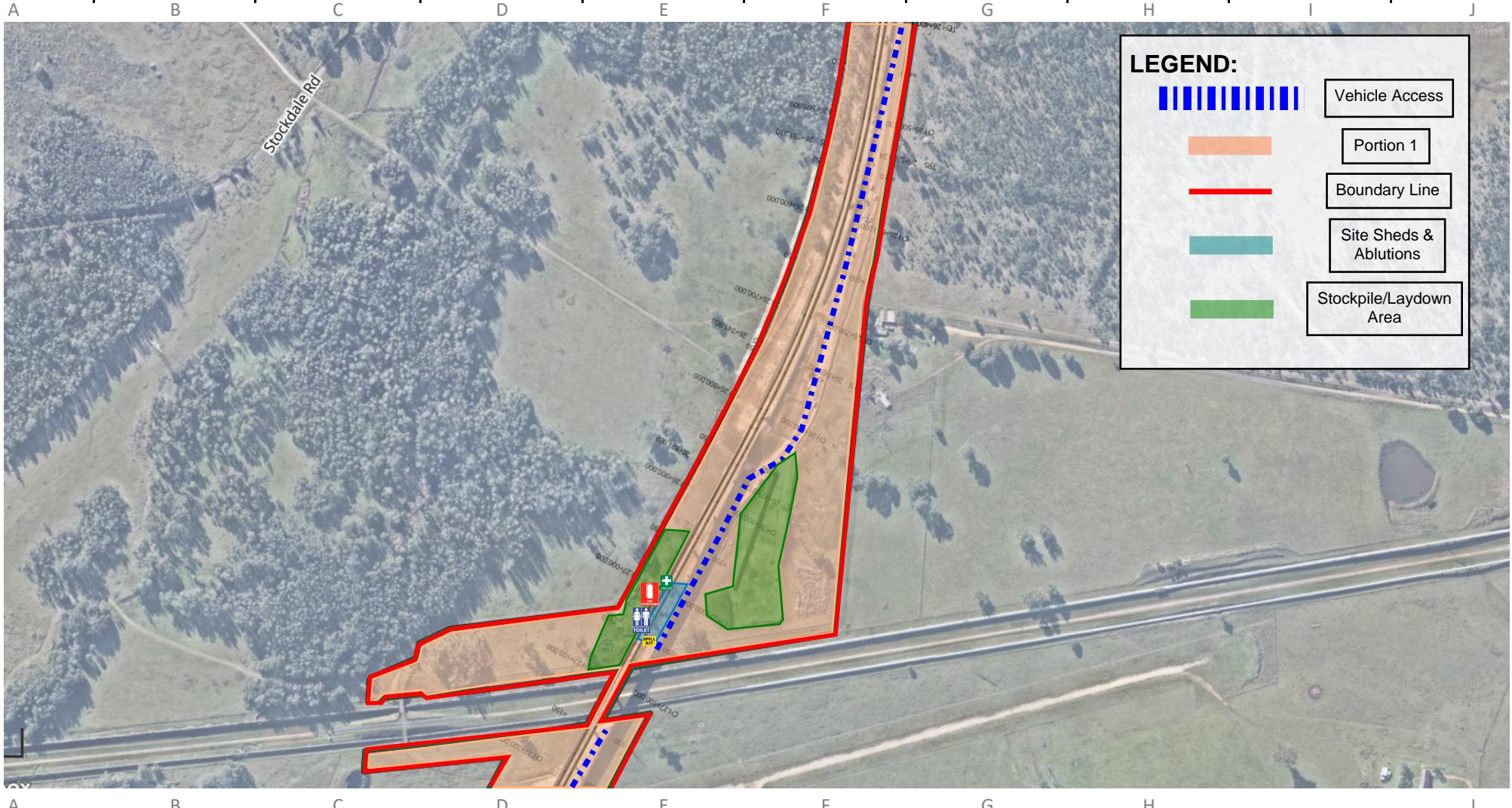
SHEET 6



SITE LAYOUT PLAN

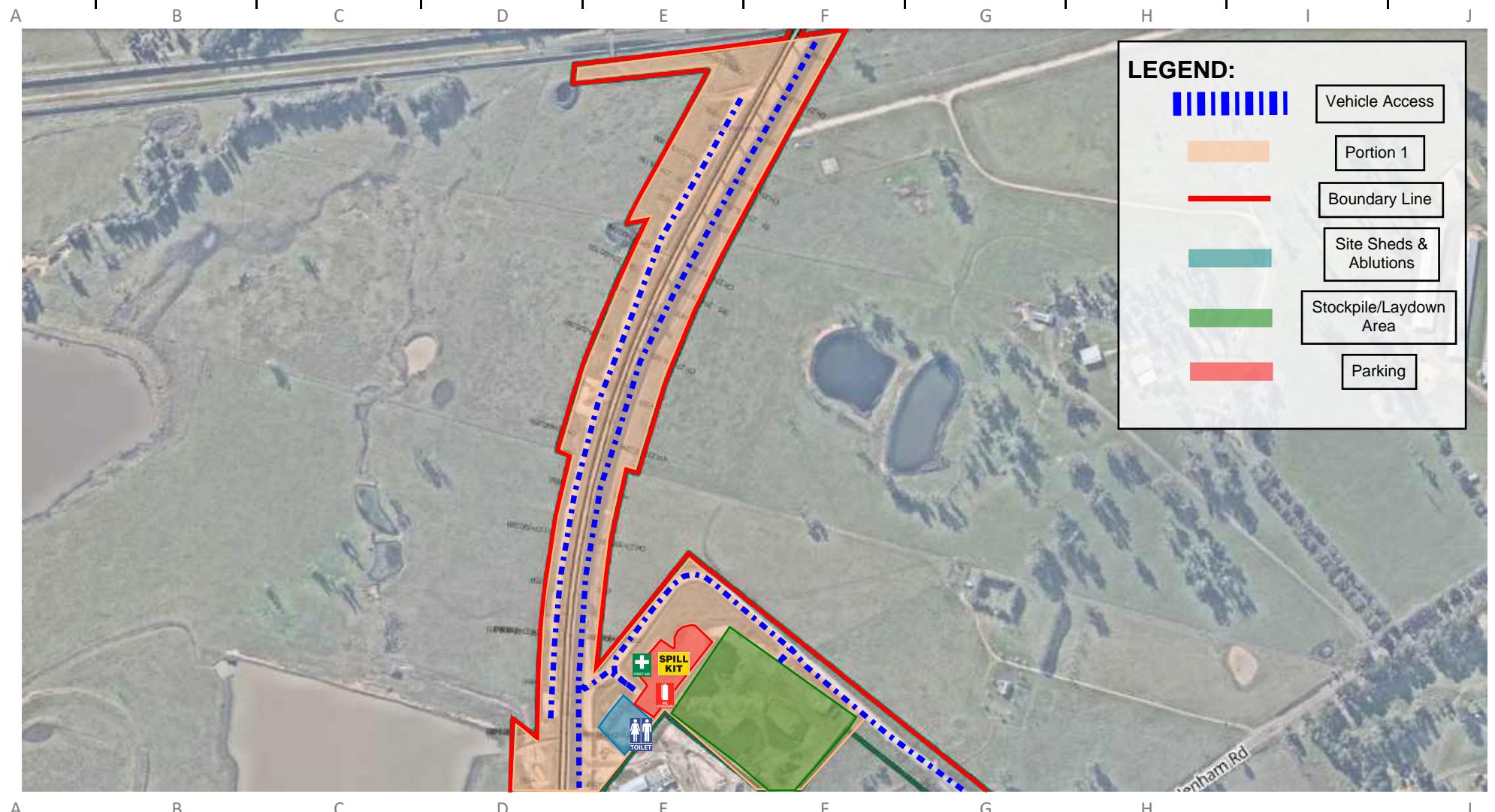
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16/09/2025	00

SHEET 7



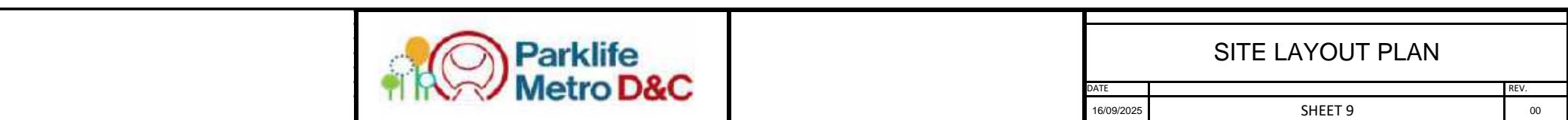
SITE LAYOUT PLAN

DATE	REV.	
16/09/2025	SHEET 8	00



LEGEND:

- Vehicle Access
- Portion 1
- Boundary Line
- Site Sheds & Ablutions
- Stockpile/Laydown Area
- Parking

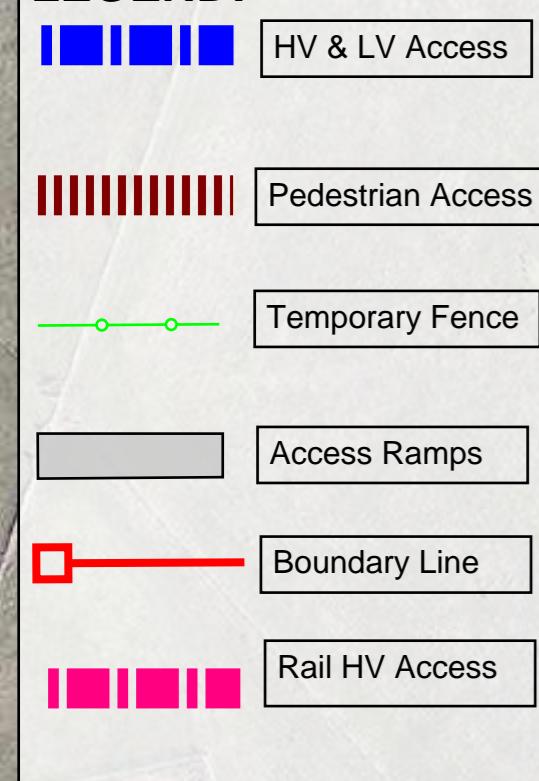


Portion 3



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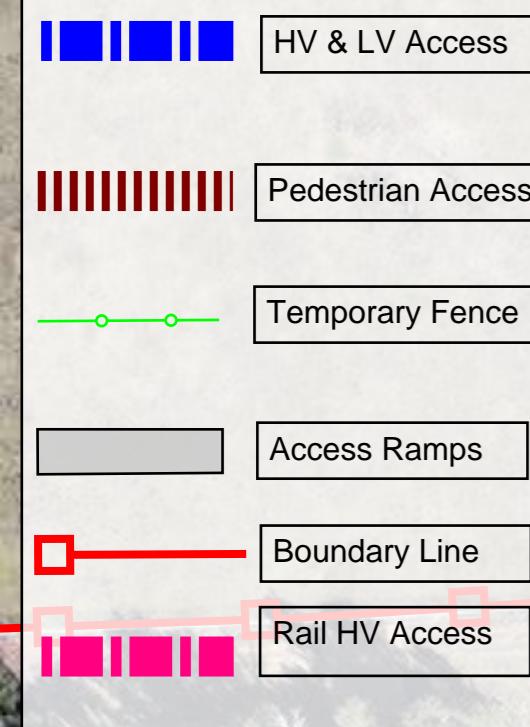
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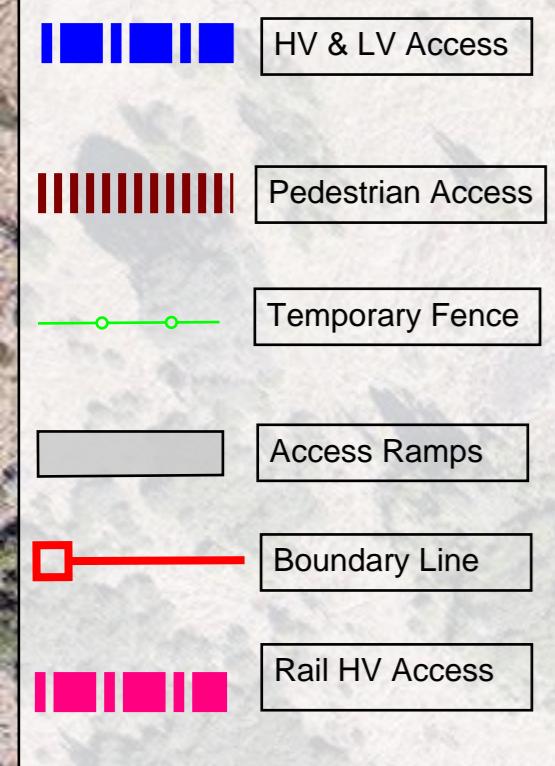


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			DATE 07.05.2025	DRAWING NO. LWD-RAIL-VMP-P3-003
				REV. 01

LEGEND:



Portion 3

RSA Trackworks Area



Parklife
Metro D&C

Project Manager

Superintendent

Site Address QR Code



DRAWING TITLE

Linewide Portion 3

DATE	DRAWING NO.	REV.
07.05.2025	LWD-RAIL-VMP-P3-004	01

Portion 3

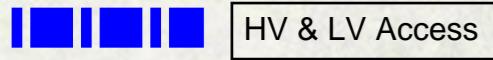
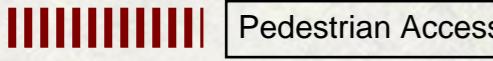
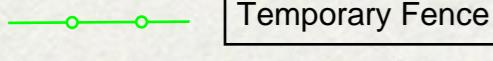
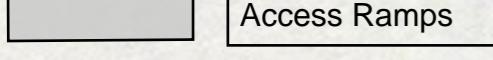
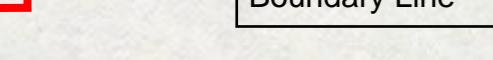
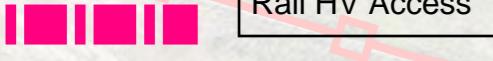
LEGEND:

-  HV & LV Access
-  Pedestrian Access
-  Temporary Fence
-  Access Ramps
-  Boundary Line
-  Rail HV Access



Project Manager	Superintendent	 Parklife Metro D&C	Site Address QR Code	DRAWING TITLE		
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			07.05.2025	LWD-RAIL-VMP-P3-005		01

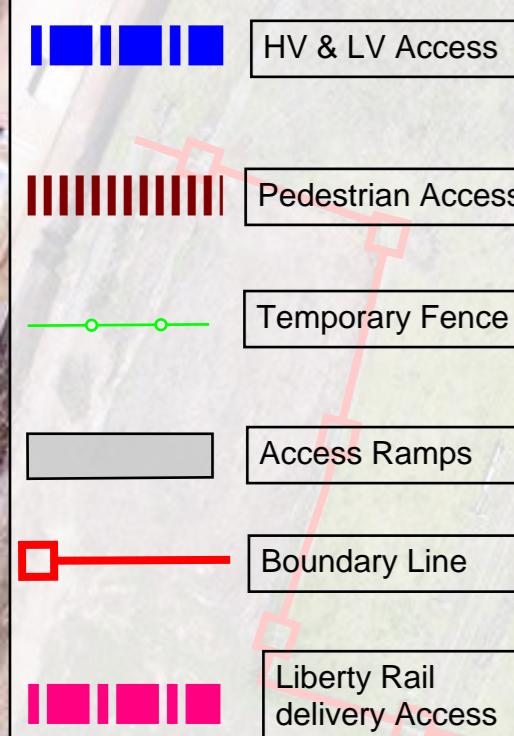
LEGEND:

-  HV & LV Access
-  Pedestrian Access
-  Temporary Fence
-  Access Ramps
-  Boundary Line
-  Rail HV Access

Portion 3



Project Manager	Superintendent	 Parklife Metro D&C	Site Address QR Code	DRAWING TITLE
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			DATE 07.05.2025	DRAWING NO. LWD-RAIL-VMP-P3-006
				REV. 01

LEGEND:

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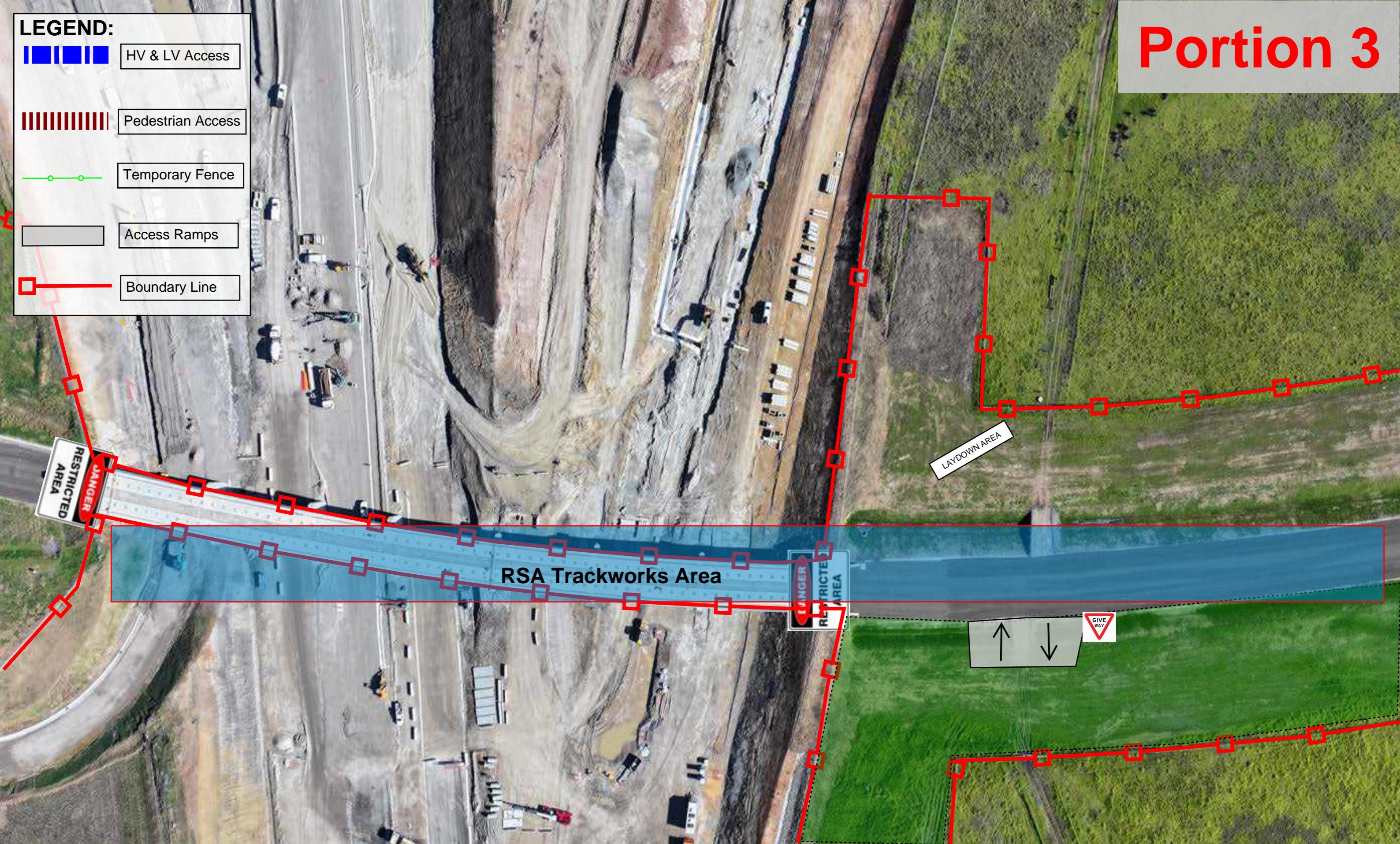


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			DATE 07.05.2025	DRAWING NO. LWD-RAIL-VMP-P3-007
			REV. 01	

Portion 3

LEGEND:

-  HV & LV Access
-  Pedestrian Access
-  Temporary Fence
-  Access Ramps
-  Boundary Line



Project Manager	Superintendent	Parklife Metro D&C	Site Address QR Code	DRAWING TITLE
				Linewide Portion 3 DATE 07.05.2025 DRAWING NO. LWD-RAIL-VMP-P3-008 REV. 01

Portion 3

LEGEND:

- HV & LV Access
- Pedestrian Access
- Temporary Fence
- Access Ramps
- Boundary Line

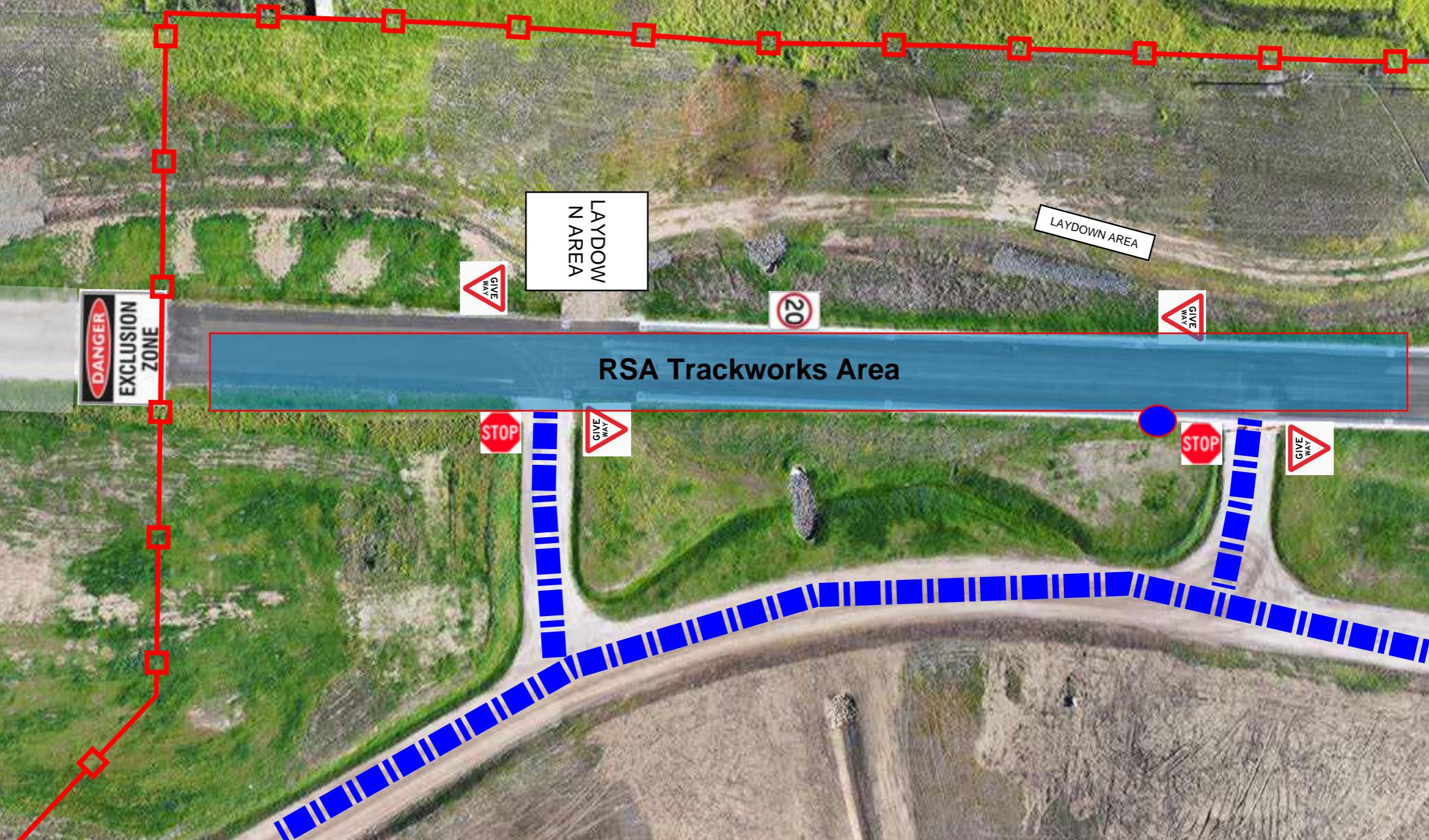


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				DATE DRAWING NO. REV.
				07.05.2025 LWD-RAIL-VMP-P3-009 01



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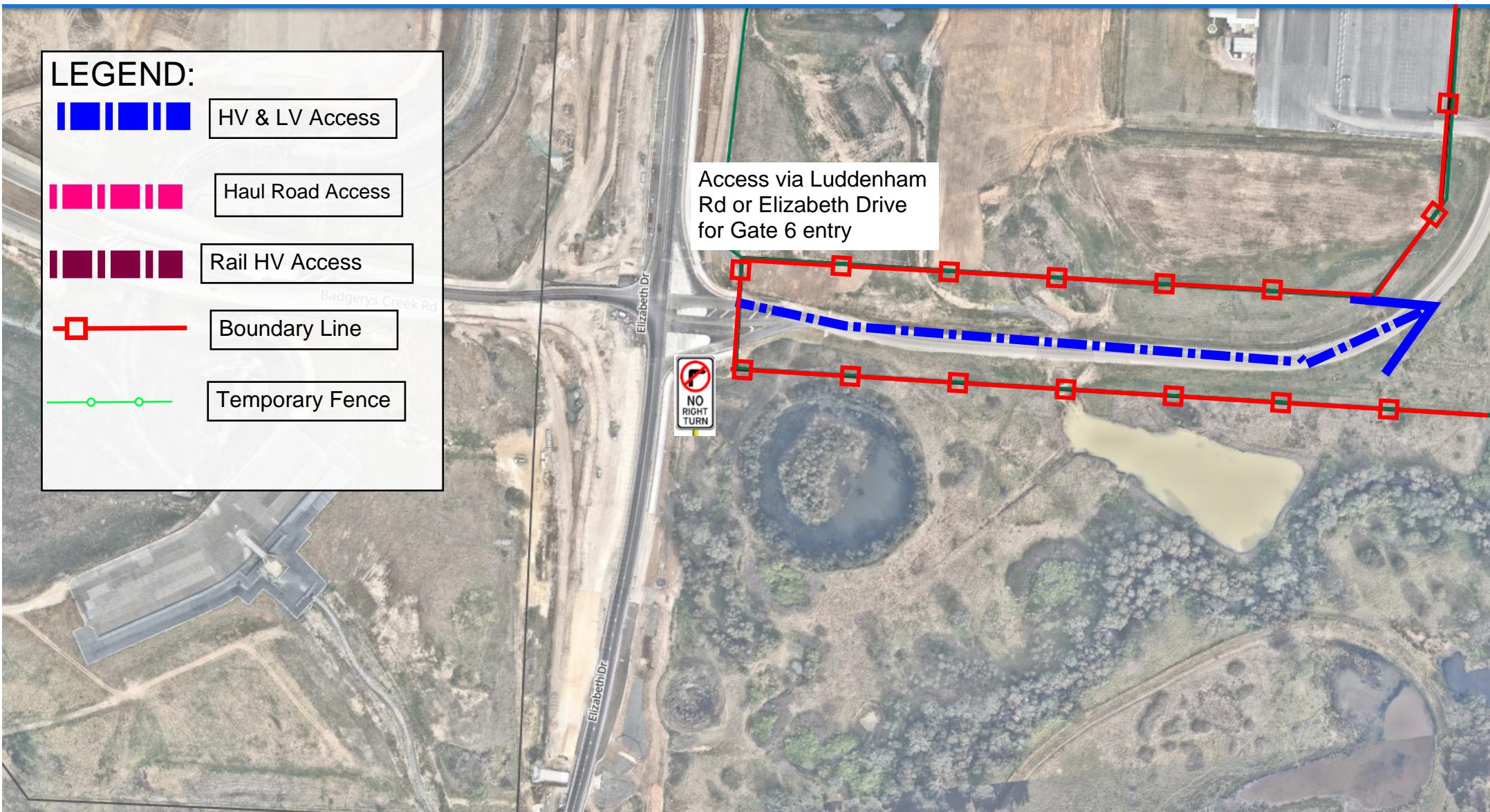
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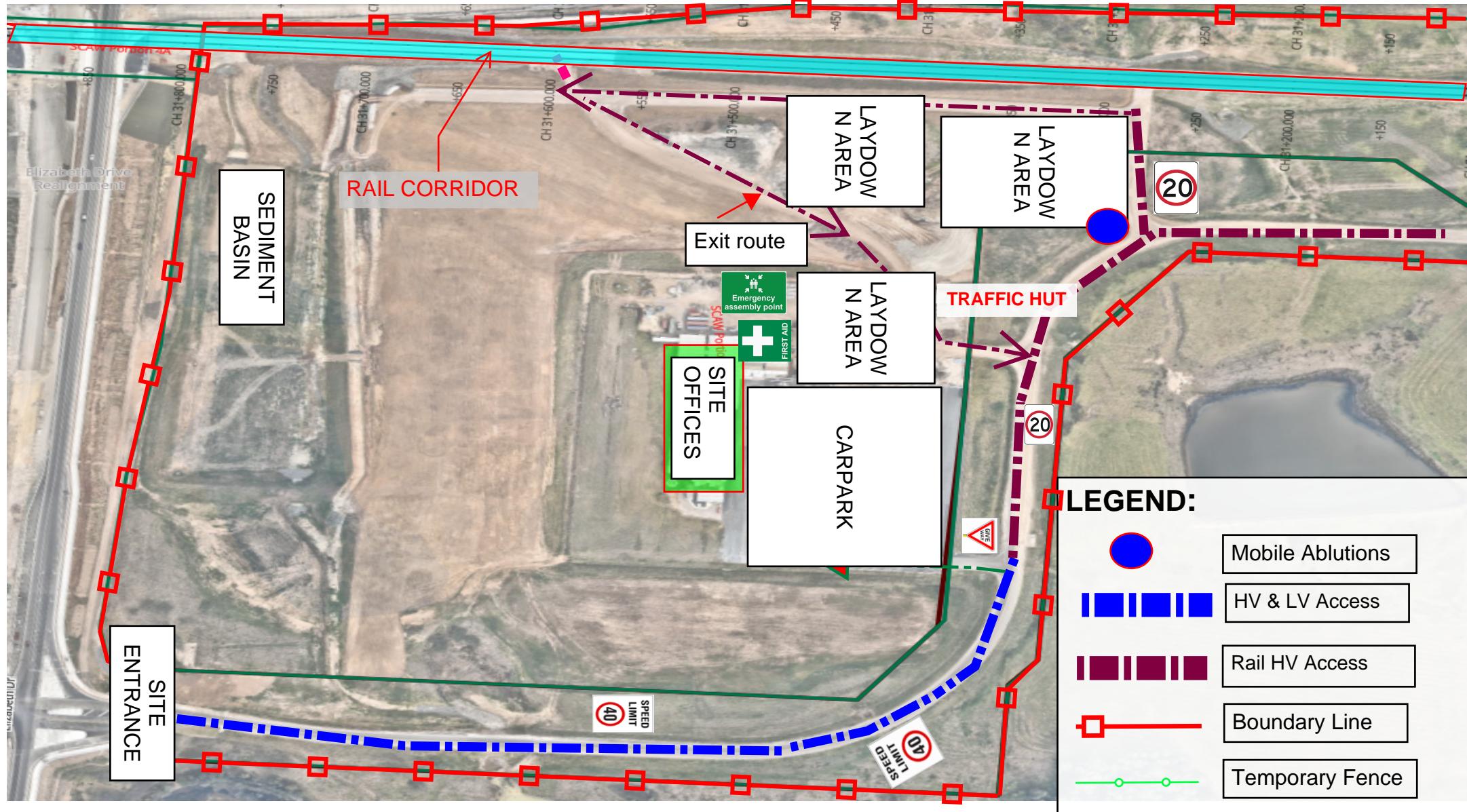
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			DATE 07.05.2025	DRAWING NO. LWD-RAIL-VMP-P3-010
				REV. 01

LEGEND:

-  HV & LV Access
-  Haul Road Access
-  Rail HV Access
-  Boundary Line
-  Temporary Fence



Project Manager	Superintendent	 Parklife Metro D&C	<u>Site Address QR Code</u>	Linewide Portion 4	
				DATE 07.05.2025 DRAWING NO. LWD-RAIL-VMP-P4-001	01



Project Manager

Superintendent

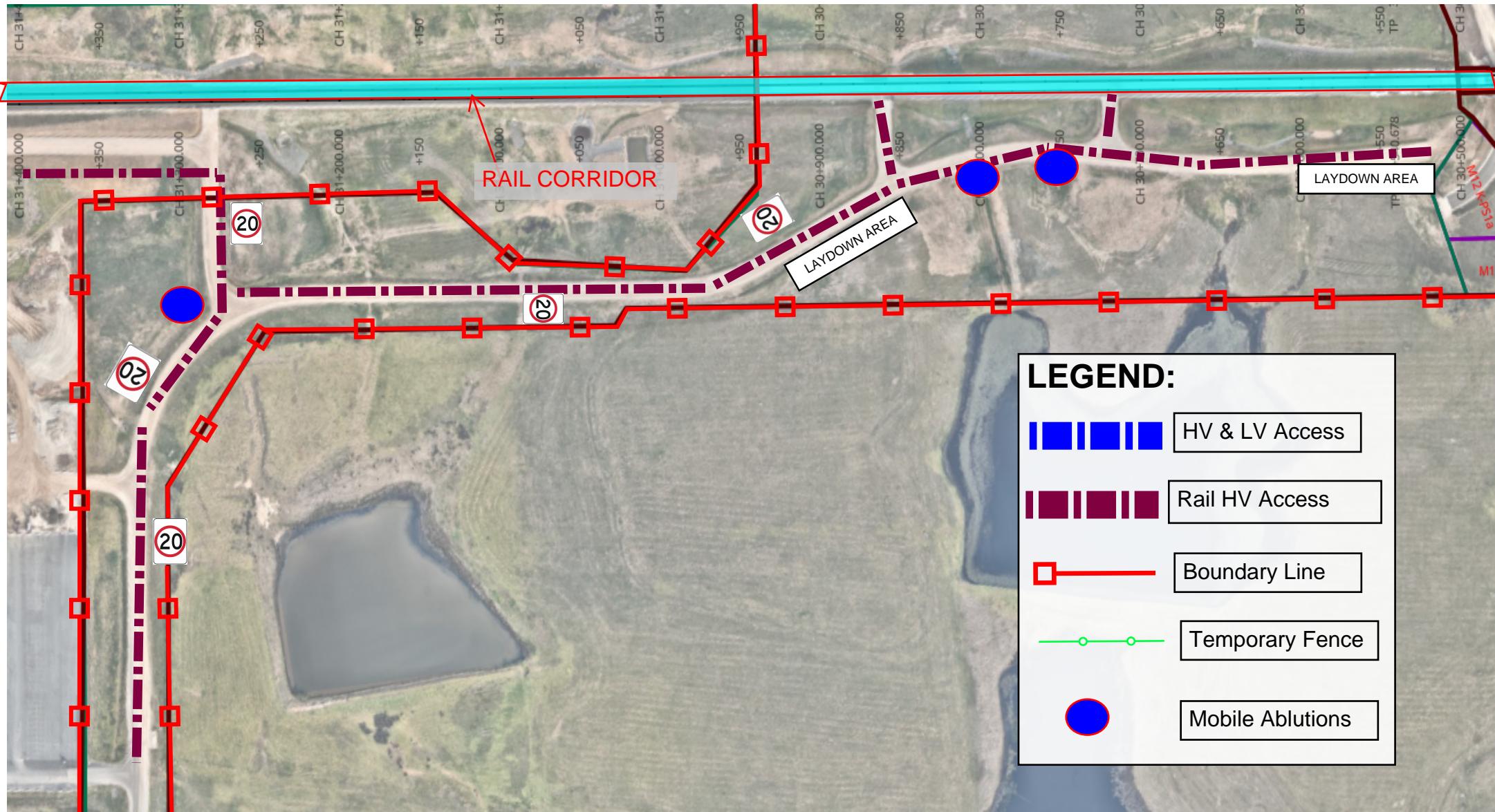


Site Address QR Code

Linewide Portion 4

DATE DRAWING NO.
07.05.2025 LWD-RAIL-VMP-P4-002

REV.
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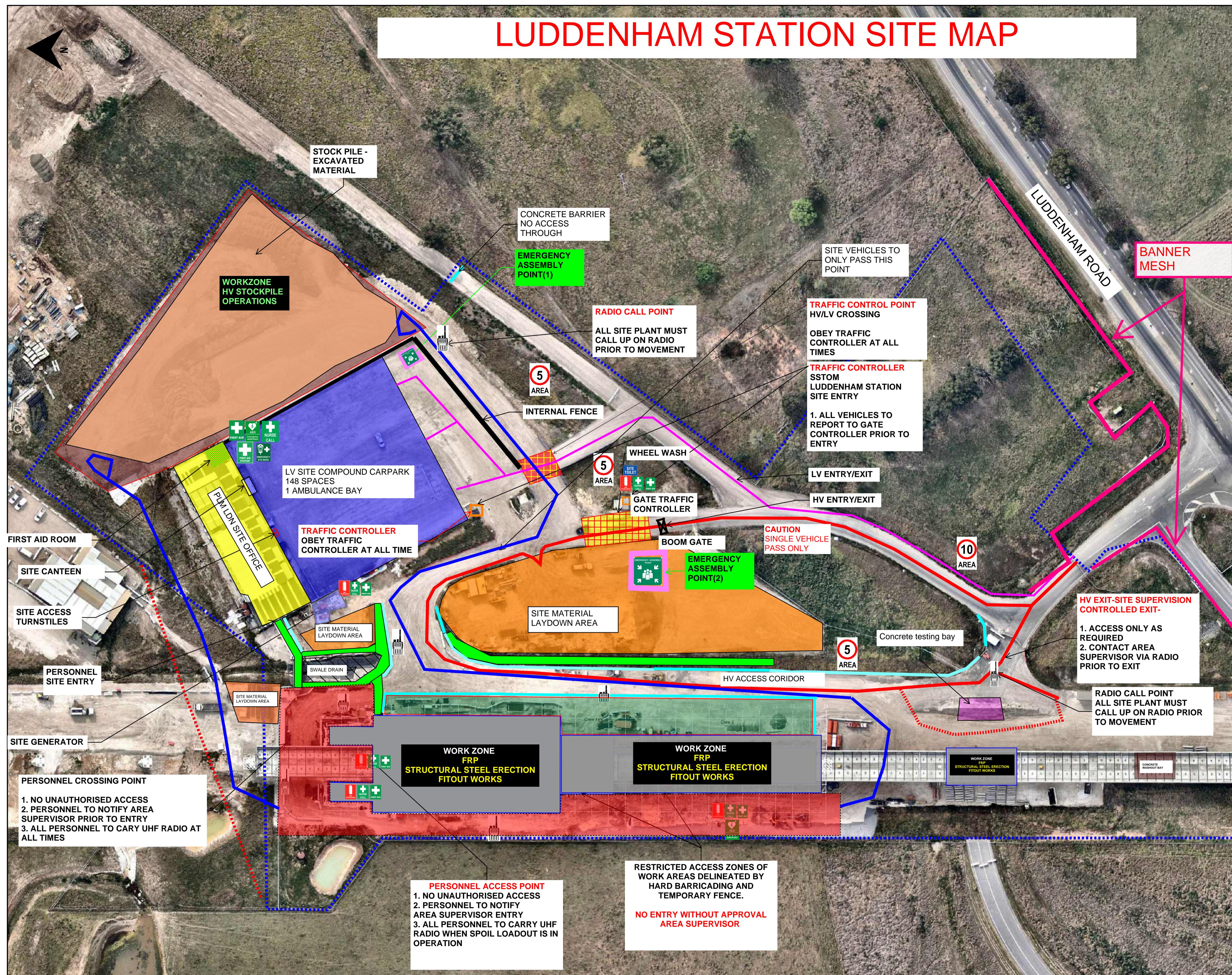
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DATE	DRAWING NO.	REV.								
07.05.2025	LWD-RAIL-VMP-P4-003	01								

LUDDENHAM STATION SITE MAP

DATE ISSUED: 27/05/2025
REV:12

LEGEND

.....	ADDITIONAL PLM PROJECT BOUNDARY
.....	PLM PROJECT BOUNDARY
—	SITE INTERNAL FENCING
—	HV SPOIL MOVEMENT
—	HV DELIVERY ACCESS
—	LV ACCESS
—	CERTIFIED CONCRETE BARRIERS
—	SITE OFFICE
—	SITE LAYDOWN AREA
—	FIRST AID ROOM
—	PEDESTRIAN WALKWAY
—	STOCKPILE AREA
—	EMERGENCY ASSEMBLY AREA
—	PPE FREE ZONE
—	WORKZONE HV STOCKPILE OPERATION
—	ACCESS GATE
—	TEMPORARY FENCE PANNEL
—	WORK ZONE FRP
—	IN GROUND SERVICES OPERATION/DETAILED EXCAVATION
—	CRANE MOVING ZONE
—	RADIO CALL POINT : ALL SITE PLANT MUST CALL UP ON RADIO PRIOR TO MOVEMENT



FOR INFORMATION

ALL VEHICLES OVER 4.5T GVM TO BE BOOKED IN VIA VOYAGE CONTROL PRIOR TO SITE ENTRY.
ALL VISITORS MUST REPORT TO THE SITE OFFICE.
PERMISSION NEEDS TO BE OBTAINED PRIOR TO SITE DELIVERY

DELIVERIES REPORT TO GATEHOUSE BEFORE ENTERING SITE.
FOLLOW POSTED TRAFFIC SIGNS AS DISPLAYED ON SITE.
APPROVED SITE ACCESS HOURS:
MON-FRI 7am to 6pm
SAT 7am to 1pm
CUT OFF TIME: 5pm
MON-FRI 6pm to 6am
SAT 1pm to MON 7am



LUDDENHAM SITE ADDRESS QR CODE

CLIENT:

PARKLIFE METRO PROJECT

The information shown on this drawing is for the purposes of the Sydney Metro Project only. No warranty is given or implied as to its suitability for any other purpose. The Service Providers accept no liability arising from the use of this drawing and the information shown thereon for any purpose other than the Sydney Metro Project.

TAO DESIGN COMPANY/CONTRACTOR: DRAWN _____

DESIGNED _____

DRG CHECK _____

DESIGN CHECK _____

APPROVED _____

SSTOM WESTERN SYDNEY AIRPORT
LUDDENHAM STATION
VEHICLE MOVEMENT PLAN

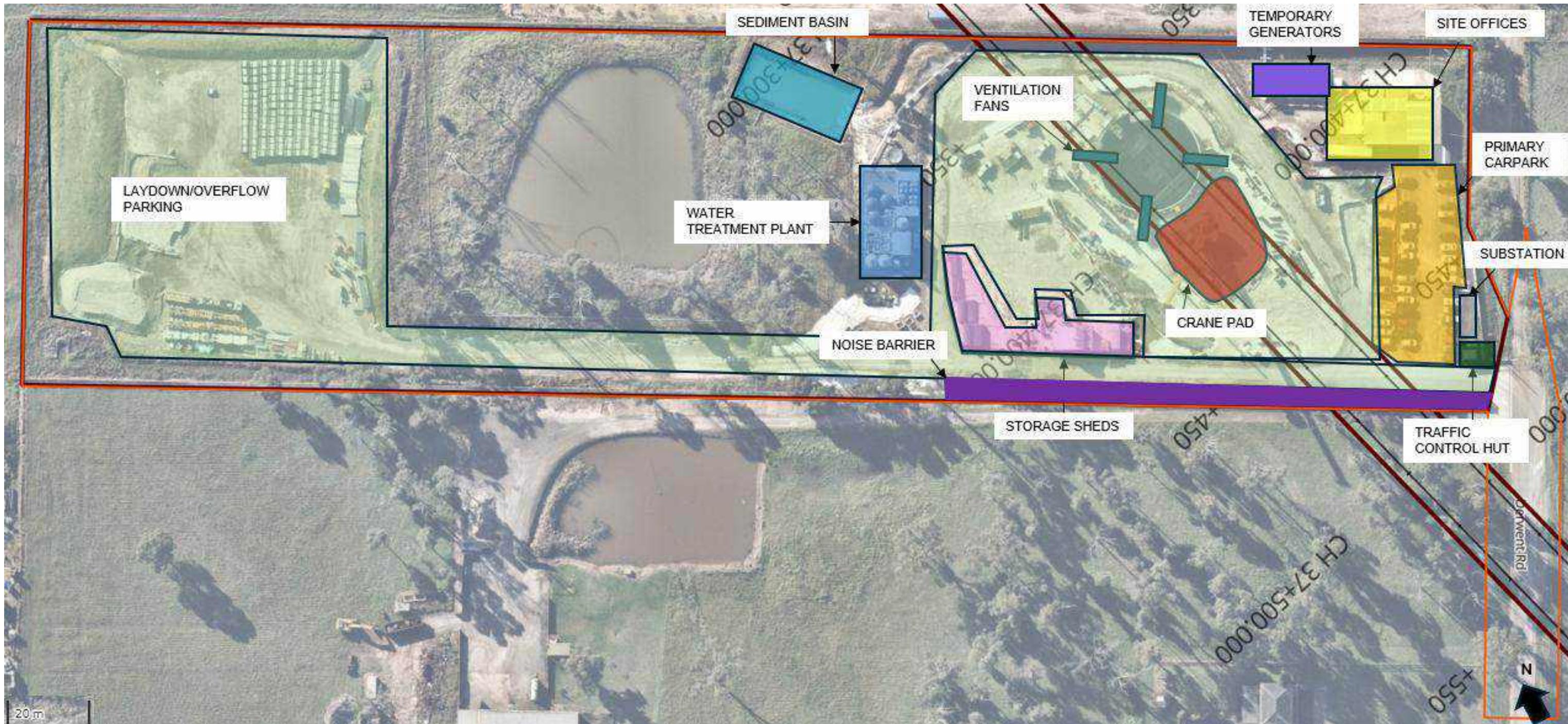
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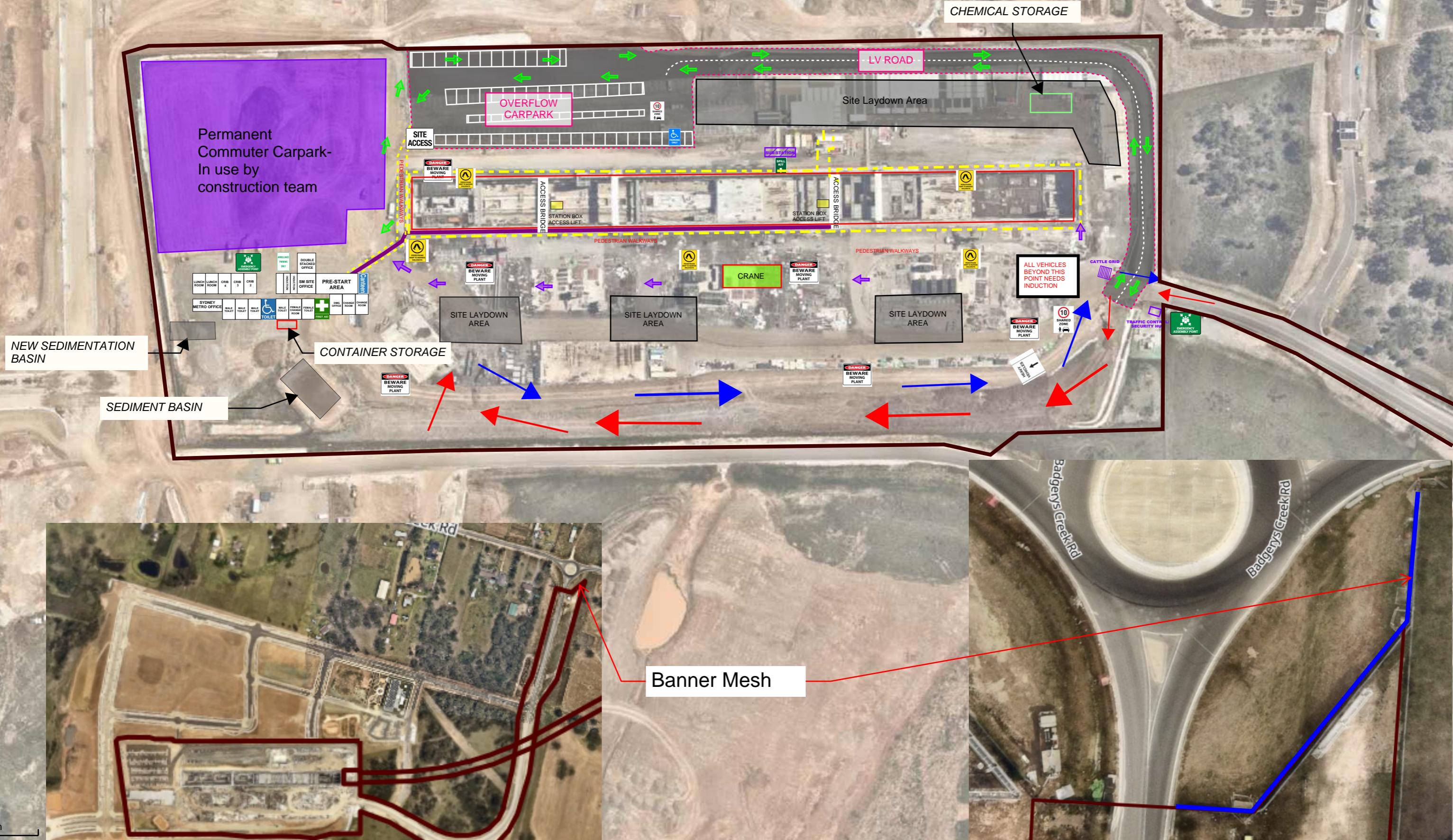
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DRG No: REV 05 VER

Co-ordinate System: Height Datum: This sheet may be prepared using colour and may be incomplete if copied

NOTE: Do not scale from this drawing.





Appendix F ISO Certification



Certificate of Approval

This certificate confirms that the company below complies with the following standard:

Company Name	Webuild S.p.A.		
Company Other Name			
Client ID	103204	Scheme	Environmental Management Systems Scheme
Certification Standard	AS/NZS ISO 14001-2016: Environmental management systems - Requirements with guidance for use		
Scope of Certification	Design and project management. Construction of roads, bridges, tunnels, dams, airports, building, precast concrete manufacturing, rail including electrical and mechanical work. Testing, commissioning, maintenance activities and civil infrastructure work.		
Type of Certification	Management System		

CERTIFICATE DATES:

Original / Initial	4/04/2013	Last Certificate update	28/02/2025
Certification / Re Certification	17/02/2025	Expiry	28/02/2028
Last Certification Decision	28/02/2025		

APPROVED COMPANY/SITE ADDRESS(ES):

Level 19, 99 Walker Street North Sydney NSW 2060 Australia

The use of the Accreditation Mark indicates accreditation by the Joint Accreditation System of Australia and New Zealand in respect to those activities covered by JAS-ANZ accreditation. Refer to www.jasan.org/register for verification.

This certification remains valid until the above mentioned expiry date and subject to the organisation's continued compliance with the certification standard, and Global-Mark's Terms and Conditions.

This Certificate of Approval remains the property of Global-Mark Pty Ltd, Company Number: ACN.108-087-654



Certification Manager

Unique Certificate Code: **100886F1C6D343DDCA258C3D00077E8D**

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