

# **Commodity Logistics and Import Project**

## **Environmental Management Strategy**

BACH-MPN-HSEC-Environmental Management Strategy

28 March 2024

## Commodity Logistics and Import Project SSI-36408005



### DOCUMENT INFORMATION

DOCUMENT TYPE	Management Standard
DOCUMENT NO	BACH-MPN-HSEC-Environmental Management Strategy
TITLE	Environmental Management Strategy
GENERAL DESCRIPTION	Strategies and controls that will be implemented to mitigate or minimise the risks associated with the construction, commissioning, and operational activities of the Commodity Logistics and Infrastructure Project which have the potential to impact the environment or the community.

Approvals	Name	Position	Signed	Date
Originator	Anita Rojas	Senior Environmental Advisor	 F423C3951D6844B	28 March 2024
Checked	Andrew Allitt	Construction Manager	 8DAFB6D360B748E	31 March 2024
Approved	Mark Dobbins	Major Projects Manager C&I	 3E649D853B2E423	02 April 2024

### REVISIONS

REV NO	DATE	DESCRIPTION	BY	CHKD	APPROVED
01	06/02/2024	Rev 1 Issue	AR	AA	MD
02	28/03/2024	Rev 2 - Updated following DPHI review	AR	AA	MD

# Commodity Logistics and Import Project SSI-36408005



## Contents

1	Glossary of Terms and Acronyms .....	4
2	Introduction .....	6
2.1	Background.....	6
2.2	Context of the Environmental Management Strategy .....	6
2.2.1	Purpose and Scope of the EMS .....	6
2.2.2	Objectives of the EMS .....	7
2.3	Health, Safety, Environment & Community Policy.....	7
3	Project Description.....	7
3.1	Project Overview.....	7
3.2	Site Location .....	7
3.3	Scope of Work .....	11
3.3.1	Stage 1 – Relocation of Coke Loader.....	11
3.3.2	Stage 2 – Installation of CSU and Conveyor Sequence.....	11
3.4	Project Timing.....	11
3.5	Work Hours .....	14
3.5.1	Construction Hours .....	14
3.5.2	Operational Hours.....	14
3.6	EMS Hold Points.....	14
4	Community and Stakeholder Engagement.....	19
4.1	Interested Parties.....	19
4.2	Stakeholder Consultation.....	19
4.3	Complaints Handling.....	19
5	Environment Management Framework .....	20
5.1	Relationship to existing Environment Management System .....	20
5.2	Environmental Management Documents .....	20
5.3	Environmental Management Structure and Responsibilities .....	22
5.4	Legal and Compliance Requirements.....	28
5.5	Training and Awareness .....	29
5.5.1	Project Team Training.....	29
5.5.2	Contractor Training .....	29
5.6	Toolbox Talks.....	29

**Commodity Logistics and Import Project  
SSI-36408005**



6 Environment Impacts, Controls, and Risk Assessment.....30

6.1 Environmental Risk Assessment .....30

6.2 Environmental Management Measures .....30

6.3 Review of Environmental Risk Assessment and Management Measures .....30

7 Monitoring and Compliance .....31

7.1 Environmental Monitoring Program .....31

7.2 Environmental Inspections and Audits .....31

7.3 Compliance Monitoring and Reporting .....32

7.4 Corrective and Preventative Actions.....32

7.5 Environmental Incident and Emergency Response.....33

7.6 EMS Review and Revision Process .....34

**Appendix 1.** Approval Conditions Relevant to the EMS.....35

**Appendix 2.** Environmental Risk Assessment.....42

**Appendix 3.** Environmental Management Measures .....48

**Appendix 4.** DPHI Environmental Management Plan Preparation Checklist .....68

## 1 Glossary of Terms and Acronyms

Term	Definitions
Approval	Infrastructure Approval
Approval Condition	Condition of Infrastructure Approval
BACH	Berth And Commodity Handling Projects
BlueScope	BlueScope Steel (AIS) Pty Ltd
BSL	BlueScope Steel Limited
CLIP	Commodity Logistics and Import Project
CLM Act	Contaminated Land Management Act 1997
CSSI	Critical State Significant Infrastructure
CSU	Continuous Ship Unloader
dB	Decibels
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPHI	Department of Planning, Housing and Infrastructure
EIS	Environment Impact Statement
EMS	Environmental Management Strategy
EP&A Act	Environmental Planning and Assessment Act 1979
EPA	Environment Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EPL	Environment Protection Licence
ha	Hectare
Hold points	Certain activities that must not commence until specified obligations have been met
HSE	Health, Safety and Environment
Incident	An incident is an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.
ISO 14001	Australian/New Zealand International Standard for Environment Management Systems
JSEA	Job Safety and Environment Analysis
km	Kilometre
L <sub>Aeq</sub>	Equivalent sound pressure level
L <sub>Amax</sub>	Maximum sound pressure level
m	metre

## Commodity Logistics and Import Project SSI-36408005



Term	Definitions
Material Harm	Material harm is harm that: a) Involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or b) Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practical measures to prevent, mitigate, or make good harm to the environment.
Non-compliance	A non-compliance is an occurrence or set of circumstances that breach the conditions of the Infrastructure Approval, Environment Protection Licence and/or any other legal requirement
Non-conformance	A non-conformance is a situation or event that does not comply with the safeguards required in this EMP
OUL	Ore Unloader
PIRMP	Pollution Incident Response Management Plan
PKSW	Port Kembla Steelworks
POEO Act	Protection of the Environment Operations Act 1997
Project	Commodity Logistics and Import Project
RTS	Response to Submissions
SWMS	Safe Work Method Statement
T&I SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
TfNSW	Transport for New South Wales



## **2 Introduction**

### **2.1 Background**

BlueScope Steel (AIS) Pty Ltd (BlueScope) is one of Australia's leading manufacturers and with its parent company, BlueScope Steel Limited (BSL), is a global leader in finished and semi-finished steel products.

BlueScope's Port Kembla Steelworks (PKSW) currently operates as an integrated iron and steel plant utilising Blast Furnace ironmaking and Basic Oxygen Furnace steelmaking operating model. The plant is co-located with hot rolling mills for plate and coil and has adjacent manufacturing facilities for cold rolling, coated products, flat products and welded beams. The site is licenced and operates in accordance with Environment Protection Licence (EPL) 6092.

South32 has notified BlueScope that from 2028, South32 will not be able to supply BlueScope with 3-seam coal as it will have exhausted available reserves at its Dendrobium mine. As there is no immediate replacement for the local 3-seam coal, BlueScope has identified that the importation of metallurgical coal from Queensland by ship will provide a suitable alternative source following the end of extraction of the 3-seam coal. BlueScope leases and operates five berths in Port Kembla Inner Harbour to import raw materials for use at PKSW which is currently used to import minor quantities of coal, however the capacity to import additional coal via these berths is constrained by the existing ship unloading infrastructure.

BlueScope plans to upgrade the PKSW raw materials berths 111, 112 and 113 (the Berths), including the unloading and conveying infrastructure through the Commodity Logistics and Import Project (CLIP) (the Project) to facilitate the ongoing supply of raw materials to supply suitable feed streams for the ongoing operation of No.5 Blast Furnace and the restart of No.6 Blast Furnace. The project will include construction of a new continuous ship unloader (CSU), relocation of existing ship unloaders and new conveying infrastructure. These upgrades will allow BlueScope to import the required quantities of raw materials and continue operation.

On 25 January 2022, the Minister for Planning and Public Spaces declared the project to be Critical State Significant Infrastructure (CSSI) in accordance with section 5.13 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and Schedule 5 of the State Environmental Planning Policy (Planning Systems) 2021.

On 24 May 2023, the Minister for Planning and Public Spaces approved the project under section 5.19 of the EP&A Act subject to conditions specified in Infrastructure Approval SSI-36408005 (Approval).

### **2.2 Context of the Environmental Management Strategy**

#### **2.2.1 Purpose and Scope of the EMS**

The Environmental Management Strategy (EMS) has been prepared to support BlueScope's Environmental Management System for the Project in compliance with the Approval.

This EMS describes the strategies and controls that will be implemented to mitigate or minimise the risks associated with the construction, commissioning, and operational activities of the project which have the potential to impact the environment or the community. It also outlines monitoring and reporting obligations required by regulators.

The EMS has been developed in accordance with the Approval Conditions, Commodity Logistics and Import Project Environment Impact Statement (EIS) and Response to Submissions (RTS), and EPL 6092. It has been written with reference to the Australian/New Zealand International Standard for Environment Management Systems (ISO 14001) and NSW Department of Planning, Housing and Infrastructure's (DPHI) Environmental Management Plan Guideline, 2020. It should be read in conjunction with the Berth and Commodity Handling (BACH) Environment Management, Construction Management, Safety Management, and Emergency Management Plans.

The Approval Conditions relevant to this EMS, and the sections of the EMS to which they relate are summarised in Appendix 1.

## Commodity Logistics and Import Project SSI-36408005



### 2.2.2 Objectives of the EMS

The objectives of the EMS are to:

- a. Describe the measures and controls to be implemented to maintain compliance with statutory requirements and commitments made in the EIS and RTS;
- b. Provide an overview of the environmental management systems and practices that will be implemented for the Project;
- c. Provide a consistent and uniform approach to ensure the required standards of environmental practices are attained and maintained for the Project;
- d. Ensure that environmental standards, specifications, regulatory obligations, and contractual obligations are consistently and uniformly achieved; and
- e. Demonstrate the relationship between BlueScope's Environmental Management System, this EMS, contract documents, Project procedures, and vendor/contractor environmental management plans.

### 2.3 Health, Safety, Environment & Community Policy

BlueScope highly values the health and safety of employees, the environment and its' communities. The BlueScope Health, Safety, Environment and Community Policy ([BSL-MS-P-01](#)) establishes the principles and actions expected of all employees to fulfil BlueScope's commitment to people and the environment and is integral to business. It is supported by the BlueScope Steel Health, Safety and Environmental Standards and forms the foundation of BlueScope's Environmental Management System.

The policy applies to all personnel working on BlueScope sites, and copies are freely available on request. This EMS supports these aspirations and incorporates detail around the high-level action framework. The Project will be undertaken in accordance with the BlueScope Steel HSEC Policy.

---

## 3 Project Description

### 3.1 Project Overview

The Project will involve upgrade of the raw materials berths, and unloading and conveying infrastructure, which will allow BlueScope to continue to import raw materials operations including iron ore, scrap, coal and other materials for ongoing steelmaking operations.

The project includes construction of a new CSU at Berth 111, new conveying infrastructure to facilitate the transportation of materials from the berth to stockpiling areas, and modifications to the berth to allow the relocation of the existing Coke Loader and two Ship Unloaders, No.2 Ore Unloader (2OUL) and No.3 Ore Unloader (3OUL).

### 3.2 Site Location

The PKSW is located in Port Kembla in the Wollongong Local Government Area and Illawarra region of NSW as shown in Figure 3-1. Sydney is approximately 80 km to the north of Port Kembla, while the Wollongong Central Business District is approximately 2.5 km to the north, and Lake Illawarra is approximately 3 km to the south. Port Kembla is the main industrial centre of the Illawarra region.

The PKSW site is zoned IN3 – Heavy Industrial under State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP). PKSW and the adjacent Springhill Works together comprise the largest site in the Port Kembla industrial area, occupying approximately 750 ha, and are mostly built around the western and southern side of Port Kembla's Inner Harbour. The PKSW site is a multi-use industrial area which includes storage,



## **Commodity Logistics and Import Project SSI-36408005**

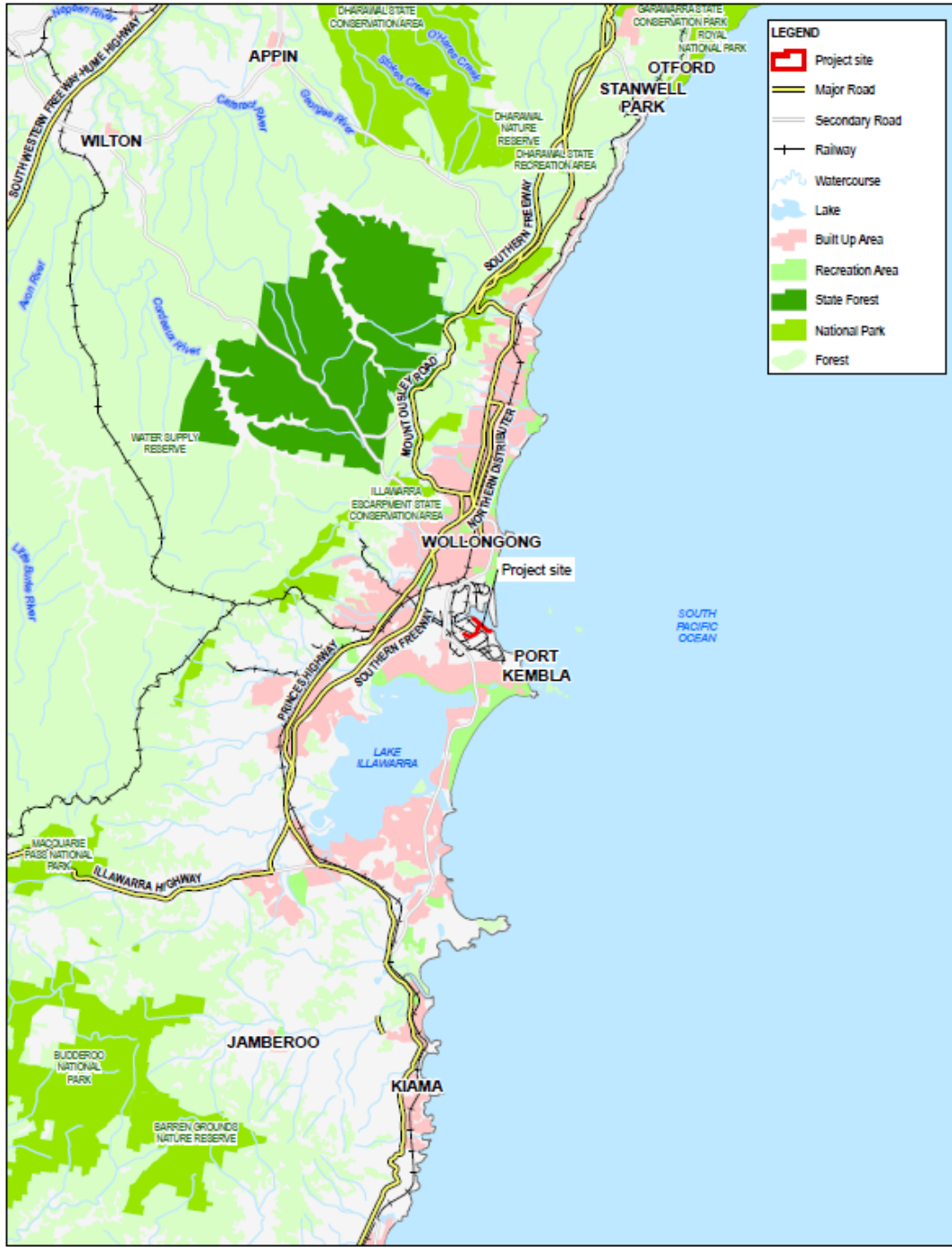


manufacturing, port berths, private internal roads and offices. Access to PKSW is provided by Springhill Road, Five Islands Road and Flinders Street, and private internal roads in PKSW.

The area surrounding the Port Kembla industrial area is primarily occupied by residential development. These urban areas provide small and large-scale retail outlets, community services (e.g. medical facilities, hospital, schools and sporting facilities) and commercial facilities (e.g. banking and post office). The Project will be located on an established (brown-field) site within the No.2 Works at the PKSW. The land to which the Project applies is predominantly within the southern section of the No.2 Works, as part of the ironmaking and cokemaking facilities, which is located within Lot 1 DP 606434. Ancillary facilities will also be required within Lot 71 DP1182824, Lot 72 DP1182824, and the broader PKSW site

. The closest urban developments to PKSW are the suburbs of Cringila, Berkeley, Lake Heights, Warrawong and Port Kembla to the south, Unanderra, Cobblers Hill, Mount St Thomas, Coniston and Figtree to the north and west as shown in Figure 3-2.

# Commodity Logistics and Import Project SSI-36408005



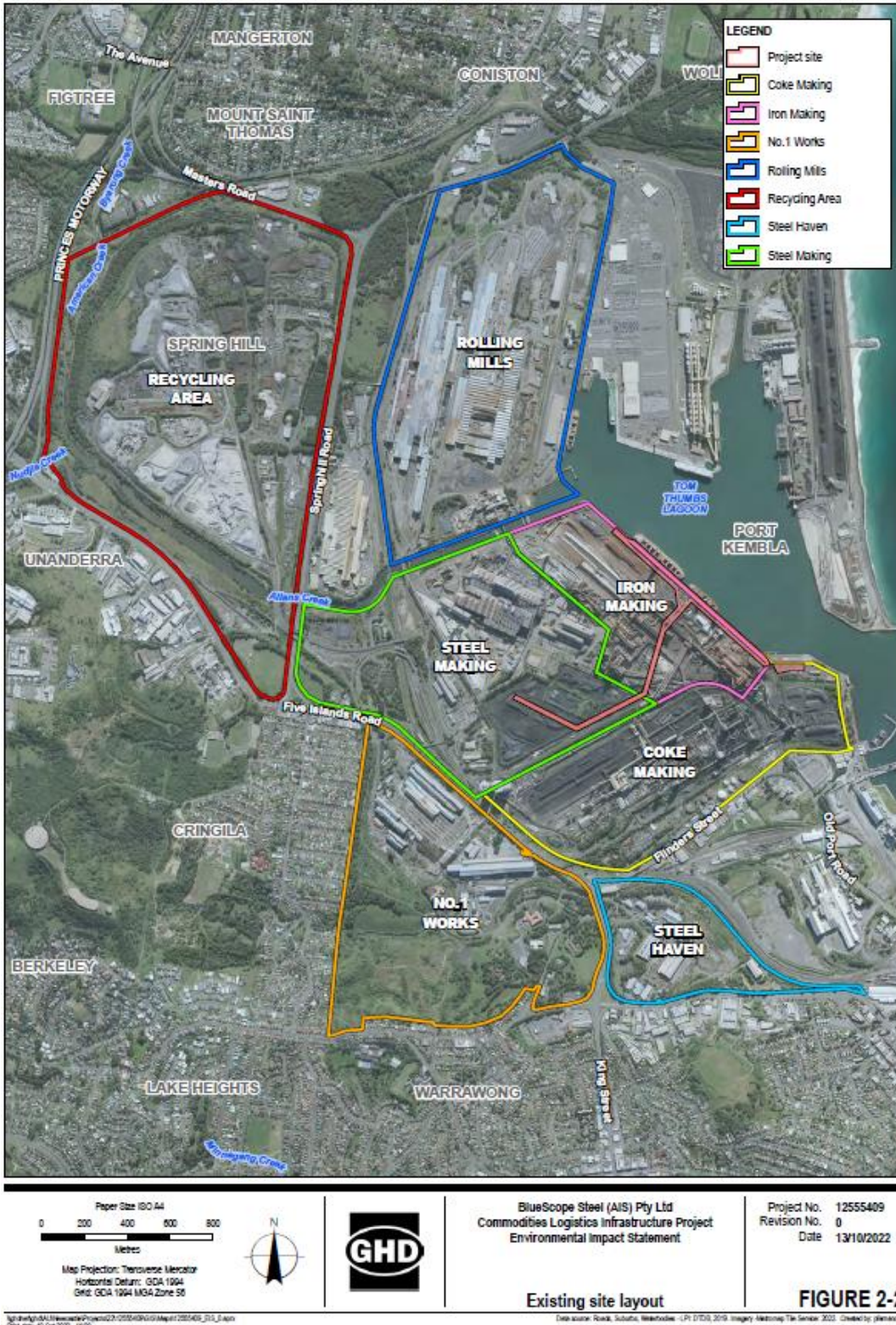
<p>Paper Size: ISO A4</p> <p>Kilometres</p> <p>Map Projection: Transverse Mercator Horizontal Datum: GDA 1994 Grid: GDA 1994 MGA Zone 56</p>		<p>BlueScope Steel (AIS) Pty Ltd Commodities Logistics Infrastructure Project Environmental Impact Statement</p>	<p>Project No. 12555409 Revision No. 0 Date 25/01/2022</p>
--	--	--	--

**Regional locality** **FIGURE 2-1**

Map data: GHD/MapInfo/Project/23-12555409/23-12555409-01-01.aprx  
Print date: 19 Oct 2022 - 14:12 Data source: Commonwealth of Australia (Geoscience Australia) 2011 Topographic Data Series 3, 2000. Contour by Interdec.

Figure 3-1 Project Regional Location. Extracted from Commodity Logistics & Import Project Environmental Impact Statement (p. 6) GHD, 2022.

**Commodity Logistics and Import Project  
SSI-36408005**



**Figure 3-2 – Port Kembla Steelworks Site Areas. Extracted from Commodity Logistics & Import Project Environmental Impact Statement (p. 7) GHD, 2022.**



## Commodity Logistics and Import Project SSI-36408005



### 3.3 Scope of Work

The project includes the following major components:

- a. Installation of a new CSU at Berth 111.
- b. Relocation and modifications to 2OUL and 3OUL to operate across Berths 111, 112 and 113.
- c. Installation of new conveyors to allow the transportation of coal to the coal storage location (4 Area).
- d. New truck wash.
- e. Installation of foundations, crane rails, and relocation of the Coke Loader and its supply conveyors to Berth 113.
- f. Modifications to berth infrastructure and supporting services infrastructure.

As the utilisation of the berth is already near full capacity, the relocation of the Coke Loader, 2OUL, and 3OUL will be undertaken to manage the current shortfall in ship discharge capacity and to provide flexibility during outage periods caused by structural works. It is proposed to split the existing CLIP scope into 2 stages.

#### 3.3.1 Stage 1 – Relocation of Coke Loader

This stage will involve the relocation of the Coke Loader at the earliest possible time to provide greater flexibility across the Berths for the importation of raw materials and to provide capacity for long berth outage periods resulting from structural works to the berth walls and support structures.

#### 3.3.2 Stage 2 – Installation of CSU and Conveyor Sequence

Commencement of this stage will occur three to four years prior to the CSU being required for use, which could be as early as 2028 depending on the expected cessation of 3-seam coal production by South32.

### 3.4 Project Timing

Prior to the installation of the CSU and its associated conveyors, structural works are required across the five BlueScope berths. Therefore, the installation of the CSU and its associated conveyors has been scheduled to be installed after the completion of works on the relevant berths.

The estimated duration and planned start times for construction activities are outlined in Table 3-1.

## Commodity Logistics and Import Project SSI-36408005



**Table 3-1 Indicative Works Schedule**

Project Stage	Description	Activities	Estimated Duration	Planned Start
Stage 1	Pre-work and site preparation.	<ul style="list-style-type: none"> <li>• Mobilisation of contractors and equipment and removal of temporary structures within the proposed work site.</li> <li>• Establishment of construction facilities, including fencing, site offices and temporary infrastructure (such as lighting and power).</li> </ul>	1-6 months	November 2023
Stage 1	Berth modifications at Berth 113	<ul style="list-style-type: none"> <li>• Excavation, piling and construction of reinforced concrete structures to support new crane rail beams, which will allow the extension of crane rails from Berth 112 to Berth 113.</li> <li>• Installation of below ground infrastructure.</li> </ul>	20-26 months	April 2024
Stage 1	Coke Loader relocation	<ul style="list-style-type: none"> <li>• Relocation of the existing conveyors and transfer house.</li> <li>• Construction of new connecting conveyor and transfer house.</li> <li>• Relocation of electrical supplies for the Coke Loader.</li> <li>• Modifications to allow 2OUL to operate on Berths 112 and 113.</li> <li>• Modifications to allow 3OUL to operate on Berths 111 and 112.</li> <li>• Modifications to existing infrastructure to facilitate these works at Berth 113.</li> <li>• Reconfiguration of internal roads.</li> <li>• Commissioning of Coke Loader and 2OUL in new positions.</li> </ul>	12-24 months	April 2024
Stage 1	Demobilisation of construction site	<ul style="list-style-type: none"> <li>• Removal of construction compound and layout down areas.</li> <li>• Return of construction areas to their previous use.</li> <li>• Fine tuning equipment.</li> <li>• Commence operation.</li> </ul>	6 months	July 2026
Stage 2	Pre-work and site preparation	<ul style="list-style-type: none"> <li>• Removal of temporary and mobile structures within the proposed work site.</li> <li>• Establishment of construction facilities, including fencing, site offices and temporary infrastructure (such as lighting and power).</li> </ul>	6 months	To be confirmed
Stage 2	Commodity clearance from the berth and transfer to 4 Area	<ul style="list-style-type: none"> <li>• Construction of new conveyors and transfer houses.</li> <li>• Piling and excavation.</li> <li>• Establishing foundations and retaining walls.</li> <li>• Installation of electrical services.</li> <li>• Minor modifications to the Berths to accommodate the new conveyors.</li> </ul>	18-24 months	To be confirmed
Stage 2	Installation of CSU at Berth 111	<ul style="list-style-type: none"> <li>• Unloading of CSU from ship onto Berth 111.</li> <li>• Connection of services to CSU.</li> <li>• Relocation of 3OUL to Berth 112.</li> <li>• Reconfiguration of internal roads.</li> </ul>	12-18 months	To be confirmed

## Commodity Logistics and Import Project SSI-36408005



Project Stage	Description	Activities	Estimated Duration	Planned Start
Stage 2	Demobilisation of construction site and commission CSU and conveyors	<ul style="list-style-type: none"><li>• Removal of construction compound and layout down areas.</li><li>• Return of construction areas to their previous use.</li><li>• Commissioning of overall system, including trial unloading of ships and trial of distribution systems.</li><li>• Fine tuning equipment.</li><li>• Commence operation.</li></ul>	6 months	To be confirmed

## Commodity Logistics and Import Project SSI-36408005



### 3.5 Work Hours

#### 3.5.1 Construction Hours

Where practical, noise generating construction activities with potential to impact any nearby receivers will be scheduled during standard hours per Table 3-2:

**Table 3-2 Standard Hours of Work**

Day	Time
Monday – Friday	07:00 – 18:00
Saturday	08:00 – 13:00
Sunday and Public Holidays	At no time

In accordance with Condition B6 of the Approval, activities may be carried out outside of the hours provided they are:

- construction that causes noise levels that are:
  - no more than 5 dB  $L_{Aeq}(15 \text{ min})$  above the Rating Background Level in accordance with the Interim Construction Noise Guideline (DECC, 2009) (or its latest version) at any residence;
  - no more than the Noise Management Levels in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) (or its latest version) at other sensitive land uses; and
  - construction that causes  $L_{Amax}$  noise levels less than 52 dB(A) during the night period; or
- delivery of plant, equipment and materials which is required to be delivered outside standard construction hours by Police and/or other authorities for safety reasons; or
- emergency work to avoid loss of life, damage to property and/or environmental harm; or
- works approved under an Out of Hours Work Protocol in accordance with condition B7.

There will be several construction activities scheduled to be undertaken outside of standard hours to manage interaction with the remainder of PKSW operations, shipping movements, tidal flows and the higher day shift workforce. The CSU itself will be transported to site by ship and require a crane lift from ship to shore. This operation and other significant crane lifts will need to be undertaken when weather conditions are calmest which generally occur during the early morning, prior to 7.00 am.

The Noise and Vibration Impact Assessment conducted for the EIS, predicted that the majority of the piling activities will not result in noise levels greater than 5dB  $L_{Aeq}(15 \text{ min})$  above the Rating Background Level. However, an exceedance was predicted during commodity berth clearance and transfer to Cokemaking. Where possible, piling activities in this area will be restricted to between the hours of 07:00 – 18:00 Monday to Friday. If this activity needs to occur outside of the standard hours, in accordance with Condition B7 of the Approval, an Out of Hours Work Protocol will be developed in consultation with the Environment Protection Authority (EPA) and the potentially affected residences. The Out of Hours Work Protocol will be prepared and approved by the Planning Secretary prior to conducting this activity and will be implemented to the satisfaction of the Planning Secretary.

#### 3.5.2 Operational Hours

Operation of the project will be 24 hours per day seven days a week, consistent with current operations.

### 3.6 EMS Hold Points

Hold Points are certain activities that must not commence until specified obligations have been met. Hold Points relevant to this Project as specified by the Infrastructure Approval are listed in Table 3-3.

## Commodity Logistics and Import Project SSI-36408005



Table 3-3 EMS Hold Points

Condition	Description	Sign Off Authority
<b>Notification of Commencement</b>		
A7	The date of commencement of each of the following stages of the development must be notified to the Department in writing prior to the commencement of each stage: a) construction; b) commissioning; c) operation; and d) decommissioning.	DPHI
A8	If the construction, commissioning, operation or decommissioning of the development is to be staged, the Department must be notified in writing of the date of commencement and the development to be carried out in each stage.	DPHI
<b>Protection of Public Infrastructure</b>		
A13	Before the commencement of construction, the Proponent must consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.	As required
<b>Water Quality</b>		
B1	Prior to the commencement of any construction or other surface disturbance for the development, the Proponent must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline. <i>Note: The development must also comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.</i>	DPHI
<b>Heritage</b>		



## Commodity Logistics and Import Project SSI-36408005



Condition	Description	Sign Off Authority
B11	<p>If any Aboriginal object is identified during construction or operation on site:</p> <ul style="list-style-type: none"> <li>a) all work in the immediate vicinity of the suspected Aboriginal object must cease immediately;</li> <li>b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and</li> <li>c) Heritage NSW must be contacted immediately.</li> </ul> <p>Work in the immediate vicinity may only recommence if:</p> <ul style="list-style-type: none"> <li>a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; or</li> <li>b) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object or Aboriginal place and makes a written direction in that regard.</li> </ul> <p><i>Note: Aboriginal objects are defined by the National Parks and Wildlife Act 1974.</i></p>	Heritage NSW
<b>Flooding</b>		
B13	<p>Prior to the commencement of construction, the Proponent must prepare a Flood Emergency Response Plan in consultation with Biodiversity and Conservation Division within the Department.</p>	DCCEEW Biodiversity and Conservation Division
<b>Environmental Management</b>		

## Commodity Logistics and Import Project SSI-36408005



Condition	Description	Sign Off Authority
C1	<p>Prior to commencing construction, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:</p> <ul style="list-style-type: none"> <li>a) provide the strategic framework for environmental management of the development;</li> <li>b) identify the statutory approvals that apply to the development;</li> <li>c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</li> <li>d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>i. keep the local community and relevant agencies informed about the operation and environmental performance of the development</li> <li>ii. receive, handle, respond to and record complaints;</li> <li>iii. resolve any disputes that may arise;</li> <li>iv. respond to any incidents, non-compliances or exceedances of any impact assessment criterion or performance measure; and</li> <li>v. respond to emergencies;</li> </ul> </li> <li>e) include an environmental risk assessment and a description of the measures that would be implemented to manage the identified risks, including commitments in the document(s) listed in condition A2(c). The environmental risk assessment must: <ul style="list-style-type: none"> <li>i. consider the environmental factors assessed in the EIS and any other environmental risks identified by the Proponent; and</li> <li>ii. include the mitigation measures identified in the EIS and any other mitigation measure required to manage the risks identified by the environmental risk assessment;</li> </ul> </li> <li>f) include a process to review the environmental risk assessment annually and determine whether the measures implemented to manage the risks identified are effective;</li> <li>g) include an adaptive management process to be implemented if the review of the risk assessment required by condition C1(f) indicates that a measure implemented is not effective in managing the identified risk(s); and</li> <li>h) includes the following subplans: <ul style="list-style-type: none"> <li>i. a Traffic Management Plan prepared in consultation with TfNSW and Council that includes: <ul style="list-style-type: none"> <li>- details of the transport route(s) to be used for all construction traffic;</li> <li>- details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route/s;</li> <li>- details about oversize/overmass vehicle requirements and management; and</li> <li>- a driver's code of conduct; and</li> </ul> </li> <li>ii. a Green and Golden Bell Frog Management Procedure including measures to protect the on-site Green and Golden Bell Frog population</li> </ul> </li> </ul>	DPHI

### Access to Information

## Commodity Logistics and Import Project SSI-36408005



Condition	Description	Sign Off Authority
C12	<p>Prior to the commencement of construction until the completion of all works under this approval, including decommissioning, the Proponent must:</p> <ul style="list-style-type: none"> <li>a) make the following information and documents (as they are obtained or approved) publicly available on its website:               <ul style="list-style-type: none"> <li>i. the documents referred to in condition A2 of this approval;</li> <li>ii. all current statutory approvals for the development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this approval;</li> <li>iv. regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this approval;</li> <li>v. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs;</li> <li>vi. a summary of the current stage and progress of the development;</li> <li>vii. contact details to enquire about the development or to make a complaint;</li> <li>viii. a summary of complaints related to the development, updated within 1 month of receiving a complaint associated with the development;</li> <li>ix. compliance reports of the development;</li> <li>x. any other matter required by the Planning Secretary; and</li> </ul> </li> <li>b) keep such information up to date, to the satisfaction of the Planning Secretary.</li> </ul>	Project Manager



## Commodity Logistics and Import Project SSI-36408005

---

# 4 Community and Stakeholder Engagement

## 4.1 Interested Parties

Interested parties relevant to the project include BlueScope inter-departments, service providers, Environment Protection Authority, NSW Ports, Port Authority of NSW, Sydney Water, Wollongong City Council, Department of Planning, Housing and Infrastructure, and the neighbouring community.

Policies and procedures are in place at BlueScope and will apply to the Project to ensure the needs and expectations of interested parties is achieved through a range of activities including the effective management of legal obligations, reporting of environmental requirements and performance, communication with regulatory authorities where applicable, employee/contractor engagement activities, and community consultation.

## 4.2 Stakeholder Consultation

Consultation will be conducted with the relevant interested parties through existing routine and ad-hoc meetings detailed in BlueScope's PKSW Stakeholder Engagement Plan (MA-ENV-06-01). The community will be regularly informed about the progress of the Project through the existing Bluescope Community Consultative Committee.

The Infrastructure Approval requires the following consultation activities:

- a. Consultation with the relevant owner and provider of services that are likely to be affected by the development (Condition A13);
- b. Development of an Out of Hours Work Protocol in consultation with the EPA and potentially affected residents (Condition B7);
- c. Preparation of a Flood Emergency Response Plan in consultation with DCCEEW's Biodiversity and Conservation Division (Condition B13); and
- d. Preparation of a Construction Traffic Management Plan in consultation with TfNSW and Council (Condition C1).

In accordance with Condition A9 of the Approval, evidence of consultation will be recorded and reported.

Further, in accordance with Condition C12, information about the project will be made publicly available on the BlueScope Illawarra website (<https://www.bluescope.com/illawarra/commodity-logistics-and-import-project>).

## 4.3 Complaints Handling

BlueScope has an established complaints handling procedure, Contact Procedure for Complaints and Enquiries (SP-ENV-07-03), that is applicable to the Project. The procedure addresses external complaints and enquiries as well as internal complaints, enquiries or self-reports and defines the key contacts and actions to be taken following a complaint or enquiry.

Complaints and enquiries can be made by calling (02) 4275 7522 or 1800 640 252 as detailed on BlueScope's public website (<https://www.bluescope.com/illawarra>) and on construction signage. All complaints, enquiries, or self-reports are responded to within 5 business days. Incident related and urgent enquiries are responded to immediately.

If a complaint develops into a dispute, further action will be taken based on the situation. This may include:

- Engaging with the complainant via telephone, e-mail, or in person.
- Collecting samples or conduct an inspection to visually assess the issue.
- Escalating with the ASP Environment and Sustainability Manager.
- Seeking professional legal advice.
- Engaging with the External Affairs Department.



## Commodity Logistics and Import Project SSI-36408005

Any complaints or enquiries that relate to the Project will be recorded in accordance with the established procedure and the Project Manager will be notified.

## 5 Environment Management Framework

### 5.1 Relationship to existing Environment Management System

BlueScope's ASP Manufacturing Management System Manual (MM.BZ-MS-M-01-01) describes the Company's established environment management system that meets the requirements of and is certified to ISO 14001. The management system utilises BlueScope's Safety, Environment, and Quality system (SEQ System) which is aligned with the BlueScope 14 Health, Safety and Environment (HSE) Standards and provides information related to managing risks, monitoring legal compliance, and maintaining the systems and documentation associated with health, safety, environment, and quality.

The SEQ system fits into the hierarchy of BlueScope's HSE documents as depicted in Figure 5-1. This EMS fits into the *Sub-Business Policies, Procedures and Guidelines* section of the hierarchy.



Figure 5-1 BlueScope's HSE Document Hierarchy

### 5.2 Environmental Management Documents

BlueScope's existing environmental management procedures and systems apply to the activities required to execute the Project. These include but are not limited to the procedures and systems listed in Table 5-1.

Table 5-1 - BlueScope Environmental Management Procedures and Systems

Document/System	Reference	Purpose
BlueScope's HSEC Policy	<a href="#">BSL-MS-P-01</a>	Identifies BlueScope's commitment to Health, Safety, Environment, and Community
ASP Manufacturing Management Systems Manual	<a href="#">MM.BZ-MS-M-01-01</a>	Describes at the highest level, those systems and processes used by BlueScope Australian Steel Products Manufacturing Businesses to effectively manage its operations



## Commodity Logistics and Import Project SSI-36408005

Document/System	Reference	Purpose
BlueScope's Safety, Environment, and Quality system	<a href="#">SEQ System</a>	A management system for Safety, Environment and Quality that provides access to the SEQ procedures, tools and other resources.
HSE Risk Management	<a href="#">BSL-HSE-SD-03-01</a>	Sets the requirements and mechanisms for implementing the BlueScope Risk Management Standard within a Health, Safety and Environmental (HSE) context.
HSE Incident Management	<a href="#">BSL-HSE-SD-12-01</a>	Sets the requirements for incident management across BlueScope in order to meet the expectations of the BlueScope Health, Safety & Environment (HSE) Management System
Management of Excavated Soil at PKSW	<a href="#">MA-ENV-02-01</a>	Outlines how excavated soil, arising during construction, demolition or maintenance activity, is managed to minimise harm to human health and the environment
Environment Requirements for Bunding of Storage Tanks	<a href="#">MA-ENV-02-03</a>	Outlines the environmental requirements for bunding and storage of non-potable liquids.
Vegetation Management Plan	<a href="#">MA-ENV-02-08</a>	Identifies the requirements of tree planting, pruning, removal, weed management and disposal
Management of Threatened Species, The Green and Golden Bell Frog, <i>Litoria Aurea</i>	<a href="#">MA-ENV-03-03</a>	Identifies the actions and requirements necessary to promote the development and maintenance of existing sub-populations of the Green and Gold Bell Frogs on the PKSW site.
Fugitive Dust and Stockpile Management Plan	<a href="#">MA-ENV-03-08</a>	Describes the system used to monitor and report both fugitive dust emissions and the conditions contributing to the dust emissions from the BlueScope PKSW site and details the how stockpiles and fugitive dust emissions are to be managed at BlueScope's PKSW site
Biodiversity Management Plan	<a href="#">MA-ENV-03-09</a>	Assists with the identification, protection and management of native vegetation and fauna habitats across BlueScope's Illawarra sites
Unexpected Finds Procedure	<a href="#">MA-ENV-03-11</a>	Provides guidance for the management of any unexpected finds including contamination and heritage items on BlueScope Steel licenced sites in New South Wales
Spill Response Guidelines	<a href="#">MA-ENV-11-02</a>	Outlines the necessary steps to be taken by Plant Departments to prepare for or respond to spills reported within their area.
Pollution Incident Response Management Plan for NSW Licenced Premises	<a href="#">MA-ENV-11-04</a>	Details the procedure for the notification of pollution incidents that result in or have the potential to cause material harm to the environment in BlueScope licenced sites across NSW
Contact Procedure for Complaints and Enquiries	<a href="#">SP-ENV-07-03</a>	Define actions to be followed by the Environment Department personnel, External Affairs personnel and the PKSW Switchboard in relation to handling complaints and enquiries
Management of Waste Material	<a href="#">DIV-AR-RS-01</a>	Describes the system for waste management within PKSW and for movement of waste materials to and from the PKSW site
SAP Learning Centre	<a href="#">SAP Learning Centre</a>	A repository of training and support materials to assist in the use of the BlueScope SAP systems and processes
Job Safety/ Environment Analyses	<a href="#">F.BZ-SEQ-S-03-02.02</a>	A tool used to identify task related hazards and controls based on the sequential job steps or unplanned changes to the job



## Commodity Logistics and Import Project SSI-36408005

Document/System	Reference	Purpose
Safe System of Work	<a href="#">BZ-OHS-S-03-01</a>	Processes that may include procedures, risk assessments, permits, inductions and training, that collectively form a system for undertaking work in a safe manner
Safe Work Method Statement	<a href="#">F.BZ-SEQ-S-09-10.21</a>	A safety document that must be developed for work that is considered high risk construction work.
Managing All Risks (MARS)	<a href="#">MARS Portal</a>	A database used to record risks, audits, incidents, and complaints.

Specific Environment Management Documents for the Project are required in accordance with the conditions of Approval and commitments made in the EIS and RTS. Some of the requirements are adequately covered by existing BlueScope procedures, while others have been prepared specifically for the Project as outlined in Table 5-2.

**Table 5-2 Project Specific Environmental Management Plans**

CLIP Management Plan	Requirement	Reference
Environmental Management Strategy	Approval Condition C1	BACH-MPN-HSEC-CLIP Environmental Management Strategy
Construction Traffic Management Plan	Approval Condition C1	BACH-MPN-CON-Traffic Management Plan
Green and Golden Bell Frog Management Procedure	Approval Condition C1	MA-ENV-03-03
Flood Emergency Response Plan	Approval Condition B13	BACH-MPN-HSEC-Flood Emergency Response Plan
Dust Management Plan	EIS Commitment	BACH-MPN-HSEC-Dust Management Plan
Construction Noise and Vibration Management Plan	EIS Commitment	BACH-MPN- HSEC-Construction Noise and Vibration Management Plan
Construction Safety Management Plan	EIS Commitment	BACH-MPN-HSEC-Safety Management Plan
Soil and Water Management Plan	EIS Commitment	BACH-MPN- HSEC-Soil and Water Management Plan
Erosion and Sediment Control Plan	EIS Commitment	BACH-MPN- HSEC- Erosion and Sediment Control Plan
Environmental Induction	EIS Commitment	BCH-TRN-HSEC-Project Induction
Operational Noise Management Plan	EIS Commitment to be completed following noise validation monitoring	BACH-MPN- HSEC-Operational Noise Management Plan

During operation, it is anticipated that workforce requirements will not change significantly from existing operations and ongoing operation traffic impacts will be consistent with the existing operation. As such, the Traffic Management Plan has only been prepared to address impacts during the construction phase of the Project.

### 5.3 Environmental Management Structure and Responsibilities

All personnel working on the Project must comply with regulatory and BlueScope requirements and must conduct work in a proper and efficient manner to protect the environment.





## Commodity Logistics and Import Project SSI-36408005

The Project Manager takes primary responsibility for environmental issues and compliance with this EMS and all associated Project documents. Environmental advisors within the BlueScope Environment Department will support the Project Manager and will assist managers and supervisors fulfill their accountabilities.

Each position in the Project management team has defined responsibilities for the management of environmental aspects and issues. All members of the Project management team should contribute to and participate in environmental management and improvement initiatives, contribute to a positive environmental culture, and participate in incident investigations.

Contractor managers and supervisors working on the project also have defined responsibilities for environmental management.

The environmental responsibilities for the key management and supervision roles include (but are not limited to) those listed in Table 5-3.

**Table 5-3 Key Management Roles and Environmental Responsibilities**

Role	Responsibilities
Project Director	<ul style="list-style-type: none"> <li>Develop a culture in which environmental effects are considered at all times.</li> <li>Contribute to and participate in the environmental program</li> </ul>
Project Manager	<ul style="list-style-type: none"> <li>Develop a culture in which environmental effects are considered.</li> <li>Participate in environmental audits and communication sessions.</li> <li>Set objectives, monitor and analyse environmental performance.</li> <li>Understand and manage Project environmental compliance for legislative requirements.</li> <li>Maintain adherence to the nominated standards and guidelines at all times.</li> <li>Incorporate environmental safety goals into the roles of all team members.</li> <li>Ensure that environmental responsibility is an integral part of all management systems and processes.</li> <li>Review training needs for all employees.</li> <li>Provide resources to ensure that actions to address environmental issues are implemented.</li> <li>Ensure that adequate environmental evaluations are made of all modification designs and plant and equipment purchases.</li> <li>Ensure that systems are in place to inform employees, contractors and visitors of pertinent environmental issues.</li> <li>Ensure that meetings are held to discuss environmental issues.</li> <li>Provide resources to minimise environmental impact.</li> <li>Ensure that desktop exercises are carried out to test the effectiveness of Emergency Response Plans.</li> <li>Ensure that there is responsible management of contractors on the site.</li> <li>Ensure that competent and trained, responsible engineers and supervisors exist to manage contractors on the works.</li> <li>Maintain a relationship with BlueScope management on environmental issues.</li> </ul>
Engineering Manager	<ul style="list-style-type: none"> <li>Ensure that management systems are in place and understood to give environmentally safe design and operation.</li> </ul>





## Commodity Logistics and Import Project SSI-36408005

Role	Responsibilities
	<p>Ensure that environmental hazards and risks are identified for all plant and major equipment.</p> <p>Ensure that designs are fit for purpose and that adequate consideration has been given to environmental issues.</p> <p>Ensure that all engineering staff are inducted and have received the required training to enable adequate environmental management of site.</p> <p>Contribute to and participate in the BACH management team environmental program.</p> <p>Provide engineering support as required to assist in the implementation and compliance of this EMS.</p> <p>Promote the involvement of all employees in improving environmental management.</p> <p>Implement the EMS with the Project Construction Manager.</p> <p>Conduct environmental audits to evaluate compliance with environmental management plans and systems as per the audit/inspection schedule.</p> <p>Report HSEC matters and performance to BlueScope.</p> <p>Liaise with BlueScope Environment Department to ensure full understanding and communication of all environmental issues impacting on BlueScope operations from BACH activities and vice versa.</p> <p>Facilitate reviews of the EMS.</p> <p>Participate in environment meetings.</p> <p>Participate in a pre-start environmental review with the vendors'/Contractor's management to facilitate an Environmental Bridging Document to remove any uncertainty/differences between this EMS and the vendors'/Contractor's EMS.</p> <p>Assist in the preparation of Emergency Response Plans.</p> <p>Coordinate and participate in drills and exercises to test the effectiveness of Emergency Response Plans.</p> <p>Identify hazards and risks through analysis and inspection, including personnel, plant and environment.</p> <p>Focus on the elimination of environmentally hazardous acts, and rectify unsafe conditions quickly.</p> <p>Conduct workplace inspections.</p> <p>Report to the Project Management team on environmental issues</p>
Construction Manager	<p>Contribute to a positive environmental culture by example.</p> <p>Ensure that management systems are in place and understood to provide an environmentally safe construction workplace.</p> <p>Participate in developing and communicating Toolbox discussions with the workgroup.</p> <p>Ensure that environmental hazards and risks are identified on all construction activities.</p> <p>Arrange construction pre-start hazard-analysis studies for all "at risk" operations.</p> <p>Contribute to and participate in the BACH management team environment program.</p> <p>Participate in environment meetings.</p>



## Commodity Logistics and Import Project SSI-36408005

Role	Responsibilities
	<p>Participate in environmental inspections and serious incident investigations.</p> <p>Participate in environmental audits.</p> <p>Focus on the elimination of environmentally unsafe acts, and rectify unsafe conditions quickly.</p> <p>Ensure that there is responsible management of contractors on the site.</p> <p>Ensure that competent and trained, responsible engineers and supervisors exist to manage contractors on the works.</p> <p>Maintain a relationship with BlueScope management on environmental issues.</p>
HSE Coordinator	<p>Understand and manage Project environmental compliance for legislative requirements.</p> <p>Participate in the Project management team environmental programs.</p> <p>Contribute to a positive environmental culture by example.</p> <p>Ensure that meetings are held to discuss environmental issues.</p> <p>Ensure that management systems are in place for environmentally safe execution of the project.</p> <p>Review training needs for all employees and provide training as required.</p> <p>Ensure that proper training is provided to enable an environmentally safe execution of the project.</p> <p>Ensure that environmental hazards and risks are identified and control measures introduced on all Project activities.</p> <p>Maintain a relationship with BlueScope management on environmental issues.</p>
Commissioning Manager	<p>Contribute to a positive environmental culture by example.</p> <p>Ensure that management systems are in place and understood to provide an environmentally safe workplace.</p> <p>Ensure that environmental hazards and risks are identified on all commissioning activities.</p> <p>Arrange commissioning pre-start hazard-analysis studies for all "at risk" operations.</p> <p>Contribute to and participate in the Project management team environment program.</p> <p>Participate in environment meetings.</p> <p>Participate in environmental inspections and serious incident investigations.</p> <p>Participate in environmental audits.</p> <p>Focus on the elimination of environmentally unsafe acts, and rectify unsafe conditions quickly.</p> <p>Ensure that there is responsible management of contractors on the site.</p> <p>Ensure that competent and trained, responsible engineers and supervisors exist to manage contractors on the works.</p> <p>Maintain a relationship with BlueScope management on environmental issues.</p>
Construction Coordinators	<p>Ensure that environmental hazards and risks are identified in design stage.</p>



## Commodity Logistics and Import Project SSI-36408005

Role	Responsibilities
	<p>Ensure that management systems are followed to give environmentally safe designs.</p> <p>Ensure self and others' environmental awareness at all times.</p> <p>Participate in developing and communicating Toolbox discussions with the workgroup.</p> <p>Be aware of environmental hazards and risks in the plant area of activity.</p> <p>Participate in and contribute to the Project management team environmental plan.</p> <p>Promote a culture in which environmental effects are considered at all times.</p> <p>Define and document environmentally safe systems of work and, through consultation, ensure they are applied.</p> <p>Ensure that all incidents are thoroughly investigated to avoid re-occurrence.</p> <p>Ensure that there is responsible management of contractors on the site.</p> <p>Ensure that contractors and employees understand any environmental hazards associated with performing tasks.</p> <p>Promote the involvement of all employees in improving environmental awareness.</p> <p>Focus on the elimination of environmentally unsafe acts, and rectify unsafe conditions quickly.</p> <p>Conduct environmental inspections, monitor behaviour on site and participate in audits.</p> <p>Notify incidents and address environmentally unsafe acts and conditions in accordance with this EMS and BlueScope's Environment Management System, and follow-up to ensure corrective and preventative actions are timely and effective.</p> <p>By actions, demonstrate to contractors at all times the commitment of the Project team to the highest standards of environmental management.</p> <p>Participate in accident /incident investigations.</p>
Environmental Advisor	<p>Promote a culture in which environmental effects are considered at all times.</p> <p>Understand and manage environmental compliance for legislative requirements.</p> <p>Provide guidance and technical direction on environmental requirements to the Project team.</p> <p>Liaise with regulatory bodies and other external agencies.</p> <p>Lead / Participate in the Project management team environmental programs</p> <p>Promote the involvement of all employees in improving environmental compliance.</p> <p>Focus on the elimination of environmentally hazardous acts, and rectify unsafe conditions quickly.</p> <p>Ensure self and others' environmental awareness at all times.</p> <p>Participate in accident/incident investigations.</p> <p>Participate in and contribute to the Project management team environmental plan.</p>



## Commodity Logistics and Import Project SSI-36408005

Role	Responsibilities
Contractor Managers and Supervisors	<p>Ensure that all incidents are thoroughly investigated to identify root causes.</p> <hr/> <p>Compliance with the requirements of the EMS.</p> <p>Ensuring environmental aspects are adequately addressed and mitigated daily during Job Safety and Environment Analyses and included in the development of the Safe Work Method Statement.</p> <p>Communicate in advance with Construction Coordinators any change in scheduled or process that could have any impacts environmentally.</p> <p>Arranging toolbox meetings to the defined schedule and ensuring that the meetings are of high standard with all employees attending and participating.</p> <p>Initiation and completion of environmental audits and inspections.</p> <p>Reporting all incidents, accidents and non-conformance in accordance with the EMS.</p> <p>Participation in relevant investigations of accidents, incidents and non-conformance.</p> <p>Demonstrating to the vendor / contractor workforce, by their actions, commitment to the highest standards of environmental management.</p> <p>Provision of appropriate resources to control / mitigate environmental hazards.</p> <p>Compliance with the requirements of the EMS.</p> <p>Attendance at team's environment meetings.</p> <p>Pro-active addressing of environmental issues, looking for improvements and looking after themselves and the environment.</p> <p>Ensuring hazards and controls are addressed and implemented prior to and during the execution of Works</p>



## Commodity Logistics and Import Project SSI-36408005

### 5.4 Legal and Compliance Requirements

At all times, the Project must comply with relevant legal and compliance requirements including:

- legislative, regulatory and other requirements such as permits and licences;
- conditions of the Infrastructure Approvals; and
- guidelines, policies, and standards.

Key legislative requirements relevant to the Project are detailed in Table 5-4.

**Table 5-4 Key Legislative Requirements**

Requirement	Project Relevance	Reference in this EMS
Environmental Planning and Assessment Act 1979 (EP&A Act)	Aims to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats, and promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State	This EMS
Protection of the Environment Operations Act 1997 (POEO Act)	An objective of the POEO Act is to protect, restore and enhance the quality of the environment, in recognition of the need to maintain ecologically sustainable development. The POEO Act provides for an integrated system of licensing and contains a core list of activities in Schedule 1 which require an Environment Protection Licence (EPL).  PKSW is operated under EPL 6092. This licence will be varied, as required, to incorporate any new and remove any discontinued scheduled activities or conditions associated with the Project.	This EMS
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Part 9 of the EPBC Act provides that an action that has, will have or is likely to have a significant impact on MNES may not be undertaken without prior approval from the Commonwealth Minister.  A known population of the Green and Golden Bell Frog ( <i>Litoria aurea</i> ) (GGBF) occurs within the greater PKSW site. All measures outlined in Management of Threatened Species, The Green and Golden Bell Frog, <i>Litoria Aurea</i> (BlueScope, 2020) will be implemented during construction of the Project, and all Project personnel will be trained in this procedure.	Section 5.5
Contaminated Land Management Act 1997 (CLM Act)	The CLM Act establishes a process for investigating and (where appropriate) remediating land that is considered to be contaminated.  The PKSW site is listed as a contaminated site by the EPA and contaminated material may be encountered during project activities.	Unexpected Finds Procedure ( <a href="#">MA-ENV-03-11</a> )
Environment Protection Licence 6092	All activities conducted on the PKSW site, including those relating to the project, must comply with the Environment Protection Licence.	Section 1.1
Infrastructure Approval SSI-36408005	All activities relevant to the Project must comply with the conditions of Infrastructure Approval SSI-36408005.	This EMS



## **Commodity Logistics and Import Project SSI-36408005**

### **5.5 Training and Awareness**

All personnel involved in the construction and commissioning works (including contractors and sub-contractors) must complete the Project induction program, which includes requirement of this EMS, an environmental awareness component and other specific site requirements, prior to commencing work. A copy of this EMS will be made available to all personnel prior to commencement of training and throughout the life of the Project.

A training needs analysis will be conducted by the Project Manager and the HSE Coordinator for all personnel working on the Project. The HSE Coordinator is responsible for implementing the training program which will be reviewed and approved by the Project Management Team prior to commencement. The training needs analysis will ensure all personnel have the required skills and competency to perform the relevant environmental management, reporting, monitoring, and stakeholder engagement functions of their role.

#### **5.5.1 Project Team Training**

A training matrix will be developed based on the training needs analysis and is recorded in SAP. The Project Manager is responsible for ensuring that all members of the Project team undertake the relevant training as outlined in the training matrix.

Training needs and competency records are managed in through BlueScope's training system, SAP.

#### **5.5.2 Contractor Training**

Vendors and contractors will be required to undertake work specific inductions for their employees prior to commencing work on the Project. Vendors and contractors will be responsible for engaging competent and experienced supervisors and employees who hold the appropriate qualification and certification for the required tasks. A training needs analysis will be performed for vendors and contractors, in order to perform their tasks in compliance with site requirements.

Training needs and competency records are managed through BlueScope's contractor management system, Comply Flow.

### **5.6 Toolbox Talks**

During the construction and commissioning of the Project 'routine Toolbox Talks will be conducted to ensure project personnel are aware of project progress, planned works, incidents and near misses, and other general matters relating to the Project.

Prior to the commencement of work each day, work teams are required to undertake a documented Toolbox Talk to confirm task outcomes, review the risks specific to the task, and ensure the necessary safety and environment controls for the task are understood and in place.

An overall toolbox talk must be included that specifically brings each of the different work teams together so that all teams are aware of the work around them and possible interactions.

During operation, incidents, near misses and other general matters relating to the Project will be shared with during shift handovers.



## Commodity Logistics and Import Project SSI-36408005

---

# 6 Environment Impacts, Controls, and Risk Assessment

## 6.1 Environmental Risk Assessment

BlueScope has an established HSE Risk Management standard ([BSL-HSE-SD-03-01](#)) which guides the identification, assessment, treatment and monitoring of HSE risks. In accordance with this standard, an environmental risk assessment has been undertaken for the Project. An environmental risk assessment was undertaken to identify the environmental aspects and impacts relevant to the Project, determine the potential likelihood and consequence of these events, and propose mitigation measures to manage and minimise the potential impacts. The results of the environmental risk assessment were recorded the project's risk and are presented in Appendix 2.

Additionally, all construction personnel must carry out a risk assessment before undertaking a specific task. A Job Safety and Environment Analysis (JSEA) or Safe Work Method Statements (SWMS) will be developed to identify hazards and controls of a specific task prior to commencing the job. The JSEA/SWMS must be reviewed and updated following unplanned changes to the job or identification of unidentified hazards.

Standard operating procedures will be developed and implemented for operation of the Project. Where operational tasks are not covered by standard operating procedures, task specific JSEAs and/or SWMS will be required to be completed prior to undertaking the task.

## 6.2 Environmental Management Measures

The EIS and the risk assessment process identified the environmental risks associated with the Project's construction, commissioning, and operational activities. Management measures to mitigate or minimise these risks are presented in Appendix 3.

## 6.3 Review of Environmental Risk Assessment and Management Measures

In accordance with Condition C1(f), during construction and commissioning the environmental risk assessment will be reviewed annually to determine whether the measures implemented to manage the risks identified are effective.

During operation, environmental risks will be integrated into the existing departmental risk register for the respective operational department(s). The frequency of monitoring and reviews of these risks will be conducted in alignment with HSE Risk Management Standard.

If at any time during construction, commissioning, or operation a non-conformance, non-compliance or incident (refer Sections 7.4 and 7.5) is recorded, the management measures associated with the related risk will be subject to an additional review.

Per the HSE Risk Management Standard, the risk review will consider input from consultation over the last review period regarding effectiveness or improvement of controls, key findings from audits of risk controls over the last review period, key lessons from incidents over the last review period regarding the effectiveness of controls, trends on any relevant leading performance metrics, and relevant external information pertinent to the risk. If the risk assessment review indicates that a measure implemented is not effective in managing the identified risk(s), additional/alternate management measures will be investigated and implemented.





## Commodity Logistics and Import Project SSI-36408005

# 7 Monitoring and Compliance

## 7.1 Environmental Monitoring Program

Monitoring will be undertaken to determine the effectiveness of environmental controls and to comply with regulatory requirements set out in the Infrastructure Approval and EPL 6092.

Aspects that will be monitored throughout the life of the Project are specified in Table 7-1.

**Table 7-1 Environmental Monitoring**

Aspect	Parameter	Location	Methodology	Frequency	Responsibility	Evidence
Air	Dust emissions	All areas	Visual Assessment Ambient Monitoring Stations	During activities with dust potential or during high winds	All personnel	CCTV Ambient Station data (OSI PI) Incidents/Self-reports
Surface Water	Discharge to waterways	EPL 6092 Licenced Discharge Points	Sampling and Analysis	As specified in EPL 6092 at a minimum	Environment Department	Laboratory Data (Monitor Pro)
Groundwater	Contamination	Environmental boreholes	Sampling and Analysis	Annually	Environment Department	Consultant Reports
Noise and Vibration	Emissions beyond the boundary	At most affected residences	Noise and Vibration Monitoring	At least every 5 years	Noise and Vibration Consultant	Consultant Reports
Soil	Contaminated material	Excavated material	Sampling and Analysis	As required	Environment Department	Laboratory Report

In addition to the monitoring listed in Table 7-1, weather forecasts will be monitored to determine if heavy rainfall or high winds might affect site activities. Daily notifications from the Early Warning Network will be emailed to relevant personnel including the Project Manager, Construction Manager, Construction Coordinator, HSE Coordinator, and Environmental Advisor.

## 7.2 Environmental Inspections and Audits

All personnel working on the Project will be encouraged to undertake environmental audits of activities as they are performed and record the audits and any findings in MARS.

During construction and commissioning, inspections of environmental controls will be conducted as a monthly audit by the Construction Manager (or a nominated delegate) to confirm the controls are in place and working effectively, and to identify improvement opportunities. The inspections may constitute a general assessment of control conditions, targeted inspections, adequacy assessment of controls, or activity observations.

**Table 7-2 Inspections during Construction and Commissioning**

Environmental Controls	Aspect	Potential Impact	Performance Criteria	Frequency
Bunding	Loss of containment	Discharge to waterway	No damage Appropriate capacity	Monthly or after heavy rainfall





## Commodity Logistics and Import Project SSI-36408005

Environmental Controls	Aspect	Potential Impact	Performance Criteria	Frequency
Chemical Storage	Loss of containment	Discharge to waterway Odour	No damage to containers or bunds Appropriate storage and bund capacity	Monthly and on use
Street Sweepers	Drag out	Dust emissions	No material on roadways Appropriate service schedule	Monthly
Water carts	Emissions from stockpiles or during excavation	Dust emissions	No emissions from stockpiles or during excavation activities	Monthly
Truck/Wheel Wash	Drag-out	Dust emissions	No material on roadways Appropriate maintenance schedule	Monthly

Observations of all inspections and audits will be documented in MARS. Any corrective actions identified must be assigned to a suitable person with an appropriate timeframe for completion.

### 7.3 Compliance Monitoring and Reporting

A Compliance Register has been developed to outline the compliance requirements relating to the Project as specified in the Infrastructure Approval, EPL 6092, and this EMS. The register tabulates the condition referenced, a description of the requirement, if conditions have been met, if a non-compliance has occurred, and supporting evidence/comments where required.

Each quarter, the Project Manager and the Environmental Advisor will review and update the Compliance Register. The HSE Manager will periodically audit the construction activities to verify compliance with this EMS.

In accordance with Conditions C8 – C11, Compliance reports on the development must be carried out in accordance with the compliance reporting requirements outlined in the *Compliance Reporting Post Approval Requirements (2020)* or its latest version. The compliance reports will be submitted to the Department in accordance with the timeframes set out in the *Compliance Reporting Post Approval Requirements (2020)* or its latest version, unless otherwise agreed to by the Secretary. Each compliance report will be made publicly available on the CLIP website within 60 days of submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary.

### 7.4 Corrective and Preventative Actions

A non-conformance is a situation or event that does not comply with the safeguards required in this EMS. A non-compliance is an occurrence or set of circumstances that breach the conditions of the Infrastructure Approval, Environment Protection Licence and/or any other legal requirement. All personnel working on the Project may raise any non-conformances, non-compliances, or improvement opportunities as they are identified.

In accordance with Condition C5 of the infrastructure Approval, non-compliances will be reported to the DPHI via the Major Projects website within seven days of becoming aware of any non-compliance. As required by Condition C6 of the Infrastructure Approval, a non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply, the reasons for the non-compliance (if known), and what actions have been, or will be, undertaken to address the non-compliance.

Non-compliances to the EPL will be reported to the EPA via the EPA Hotline or by directly contacting the relevant local EPA Officer.

Non-conformances and non-compliances will be recorded in MARS and managed in accordance with BlueScope's HSE Incident Management procedure ([BSL-HSE-SD-12-01](#)). Corrective and preventative actions addressing any



## Commodity Logistics and Import Project SSI-36408005

non-conformances or non-compliances will be assigned to relevant personnel with an appropriate completion date. These actions will be recorded as part of the MARS entry.

### 7.5 Environmental Incident and Emergency Response

An incident is an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. Material harm is harm that:

- a. Involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or
- b. Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practical measures to prevent, mitigate, or make good harm to the environment).

All incidents must be reported and managed in accordance with BlueScope's HSE Incident Management procedure ([BSL-HSE-SD-12-01](#)) and documented in MARS. Corrective and preventative actions relating to incidents will be included in the incident report. Contractor incident reports must be provided to the plant or work owner (as identified in the relevant JSEA/SWMS) such that they can be documented in MARS. A project-specific Emergency Response Plan has been developed to ensure that effective systems and appropriately trained personnel are in place to detect and respond to an emergency. This plan identifies potential emergency scenarios and their safety and environmental impacts, describes the response process, specifies personnel who are responsible and others that must be notified, and details the locations of emergency assembly areas, emergency shower and eyewash stations, spill kits, and fire suppression equipment.

A BlueScope Environment Officer on call is available 24 hours 7 days per week on 1800 640 252 or (02) 4275 7522. The Environment Officer will receive and respond to incident reports, provide clean up assistance where required, and will notify appropriate government agencies, such as the EPA and DPHI in accordance with relevant statutory requirements. In accordance with Condition C4 of the Approval, the Planning Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident related to the development. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 2 of the Approval.

BlueScope has an existing Pollution Incident Response Management Plan (PIRMP) for the Port Kembla Steelworks as required by the POEO Act. The existing PIRMP ([MA-ENV-11-04](#)) applies to all activities on the PKSW premises, including those associated with the Project.



## **Commodity Logistics and Import Project SSI-36408005**

### **7.6 EMS Review and Revision Process**

As specified in Condition C3 of the Infrastructure Approval, this EMS will be reviewed within three months of:

- a) the submission of a compliance report under conditions C8 to C11;
- b) the submission of an incident report under condition C4;
- c) the approval of any modification of the conditions of this approval; or
- d) the issue of a direction of the Planning Secretary under condition A2(b).

Where the EMS is revised as a result of the review, the revised document must be submitted to the Planning Secretary for approval within four weeks of the review in accordance with C3 of the Approval.

**Commodity Logistics and Import Project  
SSI-36408005**



## Appendix 1. Approval Conditions Relevant to the EMS

Requirement	Details	Reference in this EMS
<b>Terms of Approval</b>		
A1	In addition to meeting the specific performance criteria established under this approval, the Proponent must implement all feasible and reasonable measures to prevent, and if prevention is not feasible and reasonable, minimise any material harm to the environment that may result from the construction, operation, decommissioning or rehabilitation required under this approval.	This EMS
A2	The development must be carried out: <ol style="list-style-type: none"> <li>in compliance with the conditions of this approval;</li> <li>in accordance with all written directions of the Planning Secretary;</li> <li>generally in accordance with the EIS;</li> <li>generally in accordance with the development layout plans in Appendix 1</li> </ol>	This EMS
A4	The Proponent must comply with any reasonable requirement/s of the Planning Secretary arising from the Department's assessment of: <ol style="list-style-type: none"> <li>any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this approval;</li> <li>any reports, reviews or audits undertaken or commissioned by the Department regarding compliance with this approval; and</li> <li>the implementation of any actions or measures contained in these documents.</li> </ol>	This EMS
<b>Limits of Approval</b>		
A6	This approval will lapse five years after the date on which it is granted, unless construction has physically commenced on or before that time.	Section 3.4
<b>Notification of Commencement</b>		
A7	The date of commencement of each of the following stages of the development must be notified to the Department in writing prior to the commencement of each stage: <ol style="list-style-type: none"> <li>construction;</li> <li>commissioning;</li> <li>operation; and</li> </ol>	Section 3.4 Section 3.6

## Commodity Logistics and Import Project SSI-36408005



Requirement	Details	Reference in this EMS
	d) decommissioning.	
<b>Evidence of Consultation</b>		
A9	Where conditions of this approval require consultation with an identified party, the Proponent must: <ul style="list-style-type: none"> <li>a) consult with the identified party prior to submitting the subject document to the Planning Secretary for approval; and</li> <li>b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> <li>c) the outcome of that consultation, matters resolved and unresolved; and</li> <li>d) details of any disagreement remaining between the identified party consulted and the Proponent and how the Proponent has addressed the matters not resolved.</li> </ul> </li> </ul>	Section 4.2
<b>Staging, Combining and Updating Strategies, Plans, or Programs</b>		
A10	With the approval of the Planning Secretary, the Proponent may: <ul style="list-style-type: none"> <li>a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</li> <li>b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</li> <li>c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</li> </ul>	This EMS
<b>Protection of Public Infrastructure</b>		
A13	Before the commencement of construction, the Proponent must consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.	Section 3.6 Section 4.2
<b>Compliance</b>		
A17	The Proponent must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this approval that are relevant to activities they carry out in respect of the development.	Section 5.5
<b>Water Quality</b>		
B1	Prior to the commencement of any construction or other surface disturbance for the development, the Proponent must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline.	Soil and Water Management Plan

## Commodity Logistics and Import Project SSI-36408005



Requirement	Details	Reference in this EMS
<p><i>Note: The development must also comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.</i></p>		
<b>Air Quality</b>		
B2	The Proponent must take all reasonable and feasible steps to minimise dust generated by the development.	Dust Management Plan
B3	During construction, the Proponent must ensure that: <ul style="list-style-type: none"> <li>a) all trucks associated with the development entering or leaving the site with loads have their loads covered; and</li> <li>b) trucks associated with the development do not track material onto the public road network.</li> </ul>	Construction Traffic Management Plan
<b>Noise</b>		
B5	Other than in accordance with conditions B6 and B7, construction of the development must only be undertaken on Mondays to Fridays between the hours of 7:00 am and 6:00 pm and on Saturdays between the hours of 8:00 am and 1:00 pm. Construction must not occur at any time on Sundays or Public Holidays unless the Planning Secretary agrees otherwise.	Section 3.5 Construction Noise and Vibration Management Plan
B6	The following activities may be carried out outside the hours in condition B5: <ul style="list-style-type: none"> <li>a) construction that causes noise levels that are: <ul style="list-style-type: none"> <li>i. no more than 5 dB <math>L_{Aeq}(15 \text{ min})</math> above the Rating Background Level in accordance with the Interim Construction Noise Guideline (DECC, 2009) (or its latest version) at any residence;</li> <li>ii. no more than the Noise Management Levels in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) (or its latest version) at other sensitive land uses; and</li> <li>iii. construction that causes <math>L_{Amax}</math> noise levels less than 52 dB(A) during the night period; or</li> </ul> </li> <li>b) delivery of plant, equipment and materials which is required to be delivered outside standard construction hours by Police and/or other authorities for safety reasons; or</li> <li>c) emergency work to avoid loss of life, damage to property and/or environmental harm; or</li> <li>d) works approved under an Out of Hours Work Protocol in accordance with condition B7.</li> </ul>	Section 3.5 Construction Noise and Vibration Management Plan
B7	Apart from the activities permitted under condition B6, if the Proponent proposes to undertake any other construction works outside the hours specified in condition B5, then the Proponent must prepare and implement an Out of Hours Work Protocol for these works to the satisfaction of the Planning Secretary. This protocol must be prepared in consultation with the EPA and the residents who would be affected by the noise generated by these works, and must be consistent with the requirements of the Interim Construction Noise Guideline (DECC, 2009) (or its latest version). The Proponent must not carry out any out of hours construction works before this protocol has been approved by the Planning Secretary.	Section 3.5 Construction Noise and Vibration Management Plan
B8	All reasonable and feasible noise mitigation measures must be implemented to achieve the construction noise levels detailed in the Interim Construction Noise Guideline (DECC, 2009) (or its latest version). Any activities that could exceed the construction noise	Section 3.5

## Commodity Logistics and Import Project SSI-36408005



Requirement	Details	Reference in this EMS
	management levels must be identified and managed in accordance with the Environmental Management Strategy required under condition C1 of this approval.	Construction Noise and Vibration Management Plan
<b>Traffic and Parking</b>		
B9	The Proponent must provide parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise residential streets for parking or public parking facilities.	Construction Traffic Management Plan
<b>Waste</b>		
B10	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>a) minimise the waste generated by the development;</li> <li>b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</li> <li>c) store and handle all waste on site in accordance with its classification;</li> <li>d) not receive or dispose of any waste on site, other than in as expressly provided for in an EPL; and</li> <li>e) remove all waste from the site as soon as practicable, and ensure it is reused, recycled or sent to an appropriately licensed waste facility for disposal.</li> </ul>	Management of Waste Material (DIV-AR-RS-01)
<b>Heritage</b>		
B11	<p>If any Aboriginal object is identified during construction or operation on site:</p> <ul style="list-style-type: none"> <li>a) all work in the immediate vicinity of the suspected Aboriginal object must cease immediately;</li> <li>b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and</li> <li>c) Heritage NSW must be contacted immediately.</li> </ul> <p>Work in the immediate vicinity may only recommence if:</p> <ul style="list-style-type: none"> <li>a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal Place; or</li> <li>b) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object or Aboriginal place and makes a written direction in that regard.</li> </ul> <p><i>Note: Aboriginal objects are defined by the National Parks and Wildlife Act 1974..</i></p>	Unexpected Finds Procedure (MA-ENV-03-11)
B12	<p>If any non-Aboriginal heritage items are uncovered during the course of the work, then all works must cease immediately in that area. Unexpected finds must be evaluated and recorded in accordance with the requirements of Heritage NSW.</p> <p><i>Note: Non-Aboriginal heritage items are defined by the Heritage Act 1977.</i></p>	Unexpected Finds Procedure (MA-ENV-03-11)
<b>Flooding</b>		

## Commodity Logistics and Import Project SSI-36408005



Requirement	Details	Reference in this EMS
B13	Prior to the commencement of construction, the Proponent must prepare a Flood Emergency Response Plan in consultation with Biodiversity and Conservation Division within the Department.	Flood Emergency Response Plan
<b>Environmental Management</b>		
C1	Prior to commencing construction, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must:	Section 5
	a) provide the strategic framework for environmental management of the development	
	b) identify the statutory approvals that apply to the development	Section 5.4
	c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development	Section 5.3
	d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>i. keep the local community and relevant agencies informed about the operation and environmental performance of the development'</li> <li>ii. receive, handle, respond to and record complaints;</li> <li>iii. resolve any disputes that may arise;</li> <li>iv. respond to any incidents, non-compliances or exceedances of any impact assessment criterion or performance measure; and</li> </ul> respond to emergencies	Section 4.3
	e) include an environmental risk assessment and a description of the measures that would be implemented to manage the identified risks, including commitments in the document(s) listed in condition A2(c). The environmental risk assessment must: <ul style="list-style-type: none"> <li>i. consider the environmental factors assessed in the EIS and any other environmental risks identified by the Proponent; and</li> <li>ii. include the mitigation measures identified in the EIS and any other mitigation measure required to manage the risks identified by the environmental risk assessment;</li> </ul>	Section 6 Appendix 2 Appendix 3
	f) include a process to review the environmental risk assessment annually and determine whether the measures implemented to manage the risks identified are effective;	Section 6.3



## Commodity Logistics and Import Project SSI-36408005



Requirement	Details	Reference in this EMS
	g) include an adaptive management process to be implemented if the review of the risk assessment required by condition C1(f) indicates that a measure implemented is not effective in managing the identified risk(s); and	Section 6.3
	h) includes the following subplans: <ul style="list-style-type: none"> <li>i. a Traffic Management Plan prepared in consultation with TfNSW and Council that includes:               <ul style="list-style-type: none"> <li>- details of the transport route(s) to be used for all construction traffic;</li> <li>- details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route/s;</li> <li>- details about oversize/overmass vehicle requirements and management; and</li> <li>- a driver's code of conduct; and</li> </ul> </li> <li>ii. a Green and Golden Bell Frog Management Procedure including measures to protect the on-site green and golden bell frog population</li> </ul>	Section 5.2
<b>Revision of Strategies Plans and Programs</b>		
C3	<p>Within three months of:</p> <ul style="list-style-type: none"> <li>a) the submission of a compliance report under conditions C8 to C11;</li> <li>b) the submission of an incident report under condition C4;</li> <li>c) the approval of any modification of the conditions of this approval; or</li> <li>d) the issue of a direction of the Planning Secretary under condition A2(b);</li> </ul> <p>The Proponent must review and, if necessary, revise the studies, strategies or plans required under the conditions of approval to the satisfaction of the Planning Secretary.</p> <p>Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Planning Secretary for approval, unless otherwise agreed with the Planning Secretary.</p> <p><i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i></p>	Section 7.6
<b>Compliance</b>		
C4	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident related to the development. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 2.	Section 7.5
C5	The Planning Secretary must be notified in writing to the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.	Section 7.4

## Commodity Logistics and Import Project SSI-36408005



Requirement	Details	Reference in this EMS
C6	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Section 7.4
<b>Compliance Reporting</b>		
C8	Compliance reports on the development must be carried out in accordance with the compliance reporting requirements outlined in the <i>Compliance Reporting Post Approval Requirements (2020)</i> or its latest version.	Section 7.3
C9	Compliance reports must be submitted to the Department in accordance with the timeframes set out in the <i>Compliance Reporting Post Approval Requirements (2020)</i> or its latest version, unless otherwise agreed to by the Secretary.	Section 7.3
C10	The Proponent must make each compliance report publicly available within 60 days of submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	Section 7.3
<b>Access to Information</b>		
C12	<p>Prior to the commencement of construction until the completion of all works under this approval, including decommissioning, the Proponent must:</p> <ol style="list-style-type: none"> <li>a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ol style="list-style-type: none"> <li>i. the documents referred to in condition A2 of this approval;</li> <li>ii. all current statutory approvals for the development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this approval;</li> <li>iv. regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this approval;</li> <li>v. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs;</li> <li>vi. a summary of the current stage and progress of the development;</li> <li>vii. contact details to enquire about the development or to make a complaint;</li> <li>viii. a summary of complaints related to the development, updated within 1 month of receiving a complaint associated with the development;</li> <li>ix. compliance reports of the development;</li> <li>x. any other matter required by the Planning Secretary; and</li> </ol> </li> <li>b) keep such information up to date, to the satisfaction of the Planning Secretary.</li> </ol>	Section 4.2

## Commodity Logistics and Import Project SSI-36408005



### Appendix 2. Environmental Risk Assessment

Table A2-1 - Environmental Risk Assessment

Risk	Cause	Potential impacts	Controls	Procedures	Current Risk			
					Consequences	Likelihood	Risk score	
Air Quality	<ul style="list-style-type: none"> <li>- Excavation works</li> <li>- Stockpiling</li> <li>- Material movements</li> </ul>	<ul style="list-style-type: none"> <li>- Localised dust emissions</li> <li>- Visible emissions from the boundary of the site</li> </ul>	<ul style="list-style-type: none"> <li>- Visual monitoring and Emission Reporting</li> <li>- Water Carts</li> <li>- Proactive dust management using early warning forecasts</li> <li>- Material Spill reporting</li> <li>- Stockpile sizes will be kept to a minimum</li> <li>- Limit the cleared areas of land during construction.</li> <li>- Control on site traffic - follow specified routes - reduce the speed on site.</li> <li>- Cover all truck loads into and from the site to reduce dust escaping.</li> <li>- The CSU bucket-elevator unloading device and CSU conveyor system will be enclosed.</li> <li>- Enclosure of conveyors as much as practicable.</li> </ul>	<ul style="list-style-type: none"> <li>- MA-ENV-03-08 Fugitive Dust and Stockpile Management Plan.</li> <li>- Dust Management Plan for all construction activities.</li> </ul>	2	'Environmental impact that is localised on site and can be addressed in the short term	Possible	Medium 5
Noise	<ul style="list-style-type: none"> <li>- Demolition works.</li> <li>- Plant and equipment movements as part of construction.</li> <li>- Piling</li> </ul>	<ul style="list-style-type: none"> <li>- Localised noise that is unlikely to be audible at sensitive receivers.</li> </ul>	<ul style="list-style-type: none"> <li>- Carry out work during allowed construction hours.</li> <li>- Consult EPA and potentially affected community members if Out of Hours Work that may be audible beyond the boundary is required</li> <li>- Only the necessary size and power of equipment will be used if available.</li> <li>- Noise validation monitoring once operational.</li> </ul>	<ul style="list-style-type: none"> <li>- BZ-SEQ-S-03-322 Noise Management Procedure</li> <li>- Noise and Vibration Management Plan</li> <li>- Operational Noise Management Plan</li> </ul>	3	Environmental impact that is localised on site and can be addressed in the medium term	Rare	Low 4

## Commodity Logistics and Import Project SSI-36408005



Risk	Cause	Potential impacts	Controls	Procedures	Current Risk			
					Consequences	Likelihood	Risk score	
Vibration	<ul style="list-style-type: none"> <li>- Excavation and compaction equipment</li> <li>- Piling Rigs</li> </ul>	<ul style="list-style-type: none"> <li>- Localised vibration that is unlikely to be detected at sensitive receivers.</li> </ul>	<ul style="list-style-type: none"> <li>- Carry out work during allowed construction hours.</li> <li>- Only the necessary size and power of equipment will be used if available.</li> </ul>	<ul style="list-style-type: none"> <li>- Construction Noise and Vibration Management Plan</li> </ul>	2	<ul style="list-style-type: none"> <li>'Environmental impact that is localised on site and can be addressed in the short term</li> </ul>	Rare	Low 3
Water Quality	<ul style="list-style-type: none"> <li>- Leaks from plant and equipment and machinery used on site.</li> <li>- Stormwater runoff into harbour.</li> <li>- Loss of containment of chemicals</li> </ul>	<ul style="list-style-type: none"> <li>- Water pollution of creek.</li> <li>- Impact to marine biodiversity.</li> <li>- Visual impacts of harbour water.</li> <li>- Release of sediment or poor-quality stormwater into drains and waterways.</li> </ul>	<ul style="list-style-type: none"> <li>- Preliminary plant and equipment inspections before arriving to site and authorisation to immobilise.</li> <li>- Provision of spill kits</li> <li>- Use of erosion and sediment controls</li> <li>- All controls will be implemented before any works commence.</li> <li>- Controls will be inspected on a regular basis and where needed, controls fixed.</li> <li>- Vehicles will be restricted to existing access routes where practicable.</li> <li>- Continuation of water monitoring programs required under licence.</li> <li>- All chemical/fuel storage and loading areas will be bunded or otherwise contained.</li> <li>- All plant personnel that may encounter chemicals/fuels will be trained in required handling procedures.</li> </ul>	<ul style="list-style-type: none"> <li>- Emergency Response Plans</li> <li>- MA-ENV-11-02 Spill Response Guideline Procedure.</li> <li>- Soil and Water Management Plan</li> <li>- Erosion and Sediment Control Plan</li> <li>- MA-ENV-02-03 Environment Requirements for Bunding of Storage Tanks</li> <li>- Hazardous Chemicals Awareness Training</li> </ul>	4	<ul style="list-style-type: none"> <li>Environmental impact that is widespread on-site and/or leaving some residual damage on site.</li> </ul>	Unlikely	Medium 6

## Commodity Logistics and Import Project SSI-36408005



Risk	Cause	Potential impacts	Controls	Procedures	Current Risk			
					Consequences	Likelihood	Risk score	
Land	<ul style="list-style-type: none"> <li>- Leaks from plant and equipment and machinery used on site.</li> <li>- Identification of unexpected contamination</li> <li>- Identification of unexpected aboriginal or non-aboriginal heritage item</li> <li>- Loss of containment of chemicals</li> </ul>	<ul style="list-style-type: none"> <li>- Contamination to ground.</li> <li>- Contamination to groundwater.</li> <li>- Disposal of excavated material</li> </ul>	<ul style="list-style-type: none"> <li>- Preliminary plant and equipment inspections before arriving to site and authorisation to immobilise.</li> <li>- Preliminary geotechnical investigations</li> <li>- Training and procedures for unexpected finds</li> <li>- All chemical/fuel storage and loading areas will be bunded or otherwise contained.</li> <li>- All plant personnel that may encounter chemicals/fuels will be trained in required handling procedures.</li> </ul>	<ul style="list-style-type: none"> <li>- Emergency Response Plans</li> <li>- MA-ENV-11-02 Spill Response Guidelines</li> <li>- Unexpected Finds Procedure</li> <li>- MA-ENV-02-01 Management of Excavated Soil at Port Kembla Steelworks</li> <li>- MA-ENV-02-03 Environment Requirements for Bunding of Storage Tanks</li> <li>- Hazardous Chemicals Awareness Training</li> </ul>	2	Environmental impact that is localised on site and can be addressed in the short term	Unlikely	Low 4
Biodiversity	<ul style="list-style-type: none"> <li>- Unauthorised tree removal</li> <li>- Unexpected find of endangered flora or fauna</li> </ul>	<ul style="list-style-type: none"> <li>- Damage or loss of trees unauthorised for removal</li> <li>- Harm to endangered species</li> </ul>	<ul style="list-style-type: none"> <li>- Tree protection plans, where required</li> <li>- Training and procedures for unexpected finds and Green and Golden Bell Frogs</li> </ul>	<ul style="list-style-type: none"> <li>- MA-ENV-02-09 Vegetation Management Plan</li> <li>- MA-ENV-03-03 Management of Threatened Species, the Green and Golden Bell Frog</li> <li>- MA-ENV-03-09 Biodiversity Management Plan</li> <li>- MA-ENV-03-11 Unexpected Finds Procedure</li> </ul>	2	Environmental impact that is localised on site and can be addressed in the short term	Unlikely	Low 4

## Commodity Logistics and Import Project SSI-36408005



Risk	Cause	Potential impacts	Controls	Procedures	Current Risk			
					Consequences	Likelihood	Risk score	
Waste	<ul style="list-style-type: none"> <li>- Unexpected contaminated waste.</li> <li>- Waste brought onto site.</li> <li>- Incorrect disposal of waste/recycling</li> <li>- Waste brought onto site</li> </ul>	<ul style="list-style-type: none"> <li>- Non-compliance to regulatory requirements</li> <li>- Rejection of recycling deliveries</li> <li>- Additional disposal fees</li> </ul>	<ul style="list-style-type: none"> <li>- Provision of appropriate waste receptacles.</li> <li>- The awareness of waste minimisation practices will be included in the project induction.</li> <li>- Waste will be classified, managed and disposed of in accordance with the Waste Classification Guide (EPA, 2014).</li> <li>- Recycling and resource recovery activities will continue throughout the life cycle of the project.</li> </ul>	<ul style="list-style-type: none"> <li>- DIV-AR-RS-01 Waste Management Plan PKSW</li> <li>- BZ-HR-T-05-291.02 Waste Management Awareness training</li> <li>- Project Induction</li> </ul>	2	Environmental impact that is localised on site and can be addressed in the short term	Unlikely	Low 4

## Commodity Logistics and Import Project SSI-36408005



Risk	Cause	Potential impacts	Controls	Procedures	Current Risk			
					Consequences	Likelihood	Risk score	
Greenhouse Gas & Energy	<ul style="list-style-type: none"> <li>- Plant and equipment being used.</li> <li>- Fuel used by heavy equipment.</li> <li>- Fuel used for generators.</li> <li>- Materials and waste transportation.</li> </ul>	Emissions generated by the project activities.	<ul style="list-style-type: none"> <li>- All plant and equipment used during the construction works will be regularly maintained to comply with the relevant exhaust emissions guidelines.</li> <li>- Sustainable procurement practices will be adopted where feasible.</li> <li>- Where reasonable and practicable:               <ul style="list-style-type: none"> <li>a. Construction materials sourced locally where possible.</li> <li>b. Construction materials with high recycled content will be procured for the project where practicable.</li> <li>c. Construction materials will be low maintenance and durable will be sourced where practical.</li> <li>d. Plant and equipment will be switched off when not in constant use and not left idling.</li> <li>e. Any plant and equipment that is not working efficiently (e.g. emitting excessive smoke) will be repaired or replaced as soon as possible.</li> <li>f. Construction works will be planned to ensure minimal movement of plant and equipment, including barges.</li> <li>g. Opportunities for the reuse/recycling of other construction and demolition waste materials to be investigated and included in construction management plans, where feasible.</li> </ul> </li> </ul>	- Construction Environment Management Strategy	1	Environmental impact that is minimal and can be addressed immediately	Unlikely	Low 3

## Commodity Logistics and Import Project SSI-36408005



Risk	Cause	Potential impacts	Controls	Procedures	Current Risk			
					Consequences	Likelihood	Risk score	
Traffic	<ul style="list-style-type: none"> <li>- Excessive noise from vehicles.</li> <li>- Drag out and/or fugitive dust emissions.</li> <li>- Material haulage on residential streets.</li> <li>- Key stakeholders unaware of changes to traffic arrangements</li> </ul>	<ul style="list-style-type: none"> <li>- Noise pollution</li> <li>- Air pollution</li> <li>- Damage to public infrastructure</li> <li>- Unknown restrictions to accessibility of public roadways</li> </ul>	<ul style="list-style-type: none"> <li>- The use of engine compression brakes will be limited in proximity to residences.</li> <li>- Vehicles will be fitted with a silencer that complies with the National Transport Commission's 'In-service test procedure' and standard.</li> <li>- Key stakeholders, including owners/operators of adjacent lands and emergency service providers, will be notified of any changes to the traffic management arrangements of public roads prior to the commencement of works.</li> <li>- Predetermined haulage routes.</li> <li>- Workers required to undertake works or traffic control will be suitably trained and hold the required accreditation to carry out works on site and will also be site inducted.</li> <li>- All vehicles transporting loose materials on public roads will have the entire load covered and/or secured.</li> <li>- Public roads and access points will not be obstructed by any materials, vehicles, refuse skips or the like.</li> </ul>	<ul style="list-style-type: none"> <li>- Construction Traffic Management Plan</li> </ul>	1	Environmental impact that is minimal and can be addressed immediately	Unlikely	Low



## Commodity Logistics and Import Project SSI-36408005



### Appendix 3. Environmental Management Measures

Where mitigation measures have been updated, they are shown as:

- Strikethrough = deleted measures or text.
- Bold = new text or edit to existing mitigation measures

**Table 3-1 Environmental Management Measures**

Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<b>Air Quality</b>					
A dust management plan for use during construction activities will be prepared prior to works commencing.	Pre-construction	All areas	Environmental Advisor	EIS	Dust Management Plan
Visual monitoring of construction work during dust generating construction activities or adverse weather conditions.	All times	All areas	All personnel	EIS Dust Management Plan	CCTV Incidents/Self-reports
During demolition of any contaminated areas, extra measures will be implemented to prevent dust leaving the work area.	During Demolition	All areas	Work Owner	EIS Dust Management Plan	JSEA/SWMS
Dust generating activities will be ceased or additional controls implemented if a visual plume of dust leaves the site or monitoring shows excessive particulate levels.	During dust generating activities	All areas	All personnel	EIS Dust Management Plan	JSEA/SWMS Incidents/Self-reports
Operations conducted in areas with low moisture content material will be suspended during high-speed wind events or dust suppression will be used	During dust generating activities	All areas	All personnel	EIS Dust Management Plan	JSEA/SWMS Incidents/Self-reports
Stockpile sizes will be kept to the minimum practical.	Construction	Stockpile locations	Work Owner	EIS	Audits/Inspection

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
				Dust Management Plan	
Limit cleared areas of land and stockpiles, and clear only when necessary to reduce fugitive dust emissions.	Construction	All areas	Construction Manager	EIS Dust Management Plan	JSEA/SWMS
Control on-site traffic by following specific routes for haulage and access in accordance with signposted speeds.	Construction	Roadways	Construction Coordinator	EIS Traffic Management Plan	Audits/Inspections
All trucks hauling material on roads external to the PKSW site will be required to be covered and to maintain a reasonable amount of vertical space between the top of the load and top of the trailer.	Construction	Roadways	Construction Coordinator	EIS Approval Condition Traffic Management Plan	Audits/Inspections
Dust mitigation measures currently being implemented at PKSW will continue in project operation. These include: – Use of water cannons to provide dust suppression of the coal stockpiles in 4 Area during periods of high winds – Use of wheel wash at the exit of 4 Area to reduce wheel generated dust from haulage trucks transporting material around the PKSW site	Operation	All areas	Operations Team	EIS	Audits/Inspections Incidents/Self-reports
The CSU bucket-elevator unloading device and CSU conveyor system will be enclosed to prevent spillage and reduce dust emissions.	During design and operation	CSU location (Berth 111)	Engineering Manager	EIS	Design specifications
Enclosure of conveyors as much as practicable to minimise dust emissions from conveyors.	During design and operation	All conveyors	Engineering Manager	EIS	Design specifications
<b>Noise</b>					

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<p>A construction noise and vibration management plan (CNVMP) will be developed once a detailed construction methodology has been prepared. The plan will include:</p> <ul style="list-style-type: none"> <li>- Summary of the construction methodology.</li> <li>- Updated noise predictions at sensitive receivers if required.</li> <li>- A noise monitoring procedure and program for the duration of works.</li> <li>- Feasible and reasonable mitigation measures to be implemented to mitigated predicted impacts to sensitive receivers that may be noise affected.</li> <li>- A community consultation plan to liaise with the noise affected receivers, including: <ul style="list-style-type: none"> <li>• Notification to residences a minimum of 7 calendar days prior to the start of high noise generating works, including information such as total building time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur.</li> </ul> </li> </ul>	Pre-Construction	All areas	Environmental Advisor	EIS	Noise and Vibration Management Plan
<p>All project employees, contractors and subcontractors are to receive an environmental site induction. The site induction must at least include:</p> <ul style="list-style-type: none"> <li>- All project specific and relevant standard noise and vibration mitigation measures</li> <li>- Relevant licence and approval conditions</li> <li>- Permissible hours of work</li> <li>- Any limitations on high noise generating activities</li> <li>- Construction employee parking areas</li> <li>- Designated loading/unloading areas and procedures</li> </ul>	Prior to commencing work on site	All areas	Project Manager	EIS	Training Needs Analysis Training Records

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<ul style="list-style-type: none"> <li>- Site opening/closing times (including deliveries)</li> <li>- Environmental incident procedures</li> </ul>					
Quieter and less vibration emitting construction methods will be used where feasible and reasonable.	Construction	All areas	Work Owners	EIS	JSEA/SWMS Audits/Inspections
The noise levels of plant and equipment will have an operating sound power lower or similar to the levels presented in Table 8.17 of the EIS.	Pre-construction	All areas	Engineering Manager	EIS	Design Specifications
Where practical, noise generating activities with potential to impact any nearby sensitive receivers will be scheduled during standard hours	Construction	All areas	Construction Manager Project Manager	EIS	Project Schedule
Piling will be undertaken between the hours of 7am and 7pm. <b>Due to the proximity of residential receivers, piling in the 4 Area Stockpiling location will only be undertaken between the hours of 7am and 6pm.</b> The EPA will be consulted if it is determined that piling is required outside of these times. <b>If an out of hours works protocol is required for piling, the protocol must also be prepared and implemented to the satisfaction of the Planning Secretary.</b>	Construction	All areas	Construction Manager Project Manager	EIS	Project Schedule
As much distance as possible will be placed between the plant or equipment and residences and other sensitive land uses.	Construction	All areas	Construction Manager Project Manager	EIS	JSEA/SWMS
Equipment with directional noise characteristics will be oriented away from noise sensitive receivers where possible.	Construction	All areas	Work Owner	EIS	JSEA/SWMS
Non-tonal reversing beepers (or an equivalent mechanism) will be fitted and used on all construction vehicles and mobile plant regularly used and for any out	Construction	All areas	Work Owner	EIS	JSEA/SWMS

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
of hours work. The use of ambient sensitive alarms that adjust output relative to the ambient noise level will be considered.					
Where additional activities or plant may only result in a marginal noise increase and speed up works, the duration of impact will be limited by concentrating noisy activities at one location and moving to another as quickly as possible.	Construction	All areas	Construction Manager Project Manager	EIS	Project Schedule
Only the necessary size and power of equipment will be used if available.	Construction	All areas	Construction Manager Project Manager	EIS Noise and Vibration Management Plan	JSEA/SWMS
Loading and unloading of materials/deliveries will occur as far as practically possible from sensitive receivers.	Construction	Unloading areas	Construction Manager Project Manager	EIS	Construction Management Plan
The use of engine compression brakes will be limited in proximity to residences.	Construction	Roadways	Construction Manager Project Manager	EIS	Traffic Management Plan
Vehicles will be fitted with a maintained Original Equipment Manufacturer exhaust silencer or a silencer that complies with the National Transport Commission's 'In-service test procedure' and standard.	Construction	All areas	Work Owners	EIS	Pre-start checklist
Equipment will be regularly inspected and maintained to ensure it is in good working order. The condition of mufflers will also be checked. Equipment will not be operated until it is maintained or repaired, where maintenance or repair would address the annoying character of noise identified.	Construction	All areas	Work Owners	EIS	Pre-start checklist

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<p>All construction activities should be undertaken during standard construction hours, with the exception of the following activities (as specified in Table 2 of the ICNG):</p> <ul style="list-style-type: none"> <li>- The delivery of oversized plant or structures that police or other authorities determine require special arrangements to transport along public roads.</li> <li>- Emergency work to avoid the loss of life or damage to property, or to prevent environmental harm.</li> <li>- Maintenance and repair of public infrastructure where disruption to essential services and/or considerations of worker safety do not allow work within standard hour.</li> <li>- Public infrastructure works that shorten the length of the project and are supported by the affected community.</li> <li>- Works where a proponent demonstrates and justifies a need to operate outside the recommended standard hours.</li> </ul> <p>In the context of this project, the following activities could be considered appropriate to be conducted outside standard construction hours:</p> <ul style="list-style-type: none"> <li>- The delivery of oversized plant of structures.</li> <li>- Emergency work to avoid the loss of life or damage to property, or to prevent environmental harm.</li> <li>- Large crane lifts taking advantage of calm conditions.</li> <li>- Work required to be completed within tidal ranges.</li> <li>- Piling works at acceptable locations where the NML for noise sensitive receivers is not exceeded.</li> <li>- Works inaudible at residential premises</li> </ul>	Construction	All areas	Construction Manager Project Manager	EIS Approval Condition	Project Schedule

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
Out of hours movements will be minimised where possible.	Construction	All areas	Construction Manager Project Manager	EIS	Project Schedule
Unless previously approved, approval in writing from the EPA will be sought for construction activities outside of the standard hours of construction per EPL 6092 requirements.	Construction	All areas	Construction Manager Project Manager	EIS EPL 6092	EPA Correspondence
An Out of Hours Work Protocol will be developed in consultation with the EPA and the residents who would be affected for works outside standard construction hours, that are not exempt per Table 2 of the Interim Construction Noise Guideline (DECC, 2009) (or its latest version).	Pre-construction	All areas	Construction Manager	Approval Condition Construction Management Pant	Out of Hours Work Protocol
All reasonable and feasible noise mitigation measures must be implemented to achieve the construction noise levels detailed in the Interim Construction Noise Guideline (DECC, 2009) (or its latest version). Any activities that could exceed the construction noise management levels must be identified and managed in accordance with the Environmental Management Strategy	Construction	All areas	Work Owners	Approval Condition Noise and Vibration Management Plan	JSEA/SWMS Audits/Inspections
To check noise model predictions are representative of CLIP noise emission at sensitive receivers, noise validation measurements will be undertaken at intermediate locations in the path between source equipment and receivers. Nearfield source measurements will also be undertaken in order to confirm source noise levels and refine the noise model if required.	Operation	All areas	Project Manager Environmental Advisor	EIS	Noise Validation report
If compliance noise measurements indicate that operational noise levels are above noise predictions,	Operation	All areas	Project Manager Engineering Manager	EIS	Design reviews/modifications

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<p>mitigation measures to conveyors, conveyor drive houses and the CSU may be considered for noise reduction, such as:</p> <ul style="list-style-type: none"> <li>– Low noise bearing alternatives for conveyors where suitable</li> <li>– Upgraded construction of enclosures for conveyor and conveyor drive units</li> <li>– Local shielding around identified noise components of the CSU</li> </ul>					
<p>An operational noise management plan will be developed to minimise the risk of adverse noise impacts during the operation. It will be refined throughout the design process taking into account:</p> <ul style="list-style-type: none"> <li>– The relevant licence conditions.</li> <li>– Conditions of approval (to be confirmed).</li> <li>– The Noise Policy for Industry.</li> <li>– Australian Standards 1055 Acoustics – Description and measurement of environmental noise.</li> <li>– Approved methods for the measurement and analysis of environmental noise in NSW – currently in draft form.</li> <li>– Conclusions of verification noise monitoring prior to operations commencing.</li> <li>– The operational noise management plan should include operational noise management measures to be implemented.</li> </ul>	Following Noise Validation testing	All areas	Environmental Advisor	EIS	Operational Noise Management Plan
<b>Hazard and Risk</b>					



## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<p>Prior to construction starting, a site Construction Safety Management Plan will be completed. The Construction Safety Management Plan will include:</p> <ul style="list-style-type: none"> <li>- Procedures of isolation and evacuation of the fuel pipeline during relocation and fire management, including fire events at the bunker fuel pipeline.</li> <li>- A construction hazard assessment, identifying identify the proposed methodology of the site construction and/ or installation for hazardous situations. The detailed methodology will indicate the potential hazards and the control measures required to mitigate risks to as low as reasonably practicable during the construction stage.</li> </ul> <p>A risk register produced from the construction hazard assessment which will be treated as a live document to be regularly reviewed during the construction phase. Any information considered to be relevant to the operational phase will be carried forward in the risk register.</p>	Pre-construction	All areas	Project Manager HSE Coordinator	EIS	Construction Safety Management Plan
Existing conveyor design and safeguards will be utilised.	Construction	Conveyors	Construction Manager	EIS	Conveyor Design
Existing emergency management procedures will be updated where relevant.	Construction	All areas	Project Manager HSE Coordinator	EIS	Emergency Response Plan
Inspection and maintenance regime for conveyor systems will be implemented during operation.	Operation	Conveyors	Operations team	EIS	Inspection and maintenance registers
<b>Water and Hydrology</b>					
Prior to construction commencing, a site-specific Soil and Water Management Plan (SWMP) will be prepared. The plan will include arrangements for managing wet weather events, specific controls and environmental inspection	Pre-construction	All areas	Environmental Advisor	EIS	Soil and Water Management Plan

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
requirements. The SWMP will include an Erosion and Sediment Control Plan (ESCP) which will be prepared in accordance with the Blue Book -Managing Urban Stormwater: Soils and Construction (4th edition, Landcom, 2004) and Volume 2 (DECC, 2008).					
The ESCP will detail the erosion controls used for the project and where they will be established. The ESCP will include site specific measures to: <ul style="list-style-type: none"> <li>- Prevent sediment moving off-site and sediment laden water entering any watercourse, drainage lines, or drain inlets</li> <li>- Prevent mixing of soils</li> <li>- Ensure soils are replaced in their pre-existing configuration during rehabilitation where possible</li> <li>- Reduce water velocity overland and capture sediment on site</li> <li>- Minimise the amount of material transported from site to surrounding pavement surfaces</li> <li>- Divert clean water around excavations where practical</li> <li>- Install measures and site entry and exit points to minimise movement of material onto public roads</li> </ul>	Pre-construction	All areas	Environmental Advisor	EIS	Soil and Water Management Plan
Erosion and sediment controls will be established prior to works commencing on site.	Pre-construction	All areas	Work Owner	Approval Condition EIS Soil and Water Management Plan	JSEA/SWMS Audits/Inspections
Erosion and sediment controls will be inspected on a regular basis and replaced when their function is compromised.	Monthly or following heavy rainfall	All areas with controls	Construction Manager	EIS	JSEA/SWMS Audits/Inspections

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
Soil from excavation generated will be reused where applicable. Excess spoil not required or able to be reused onsite will be disposed of appropriately as per the EPA's Waste Classification Guidelines (2014).	Construction	All areas with excavation	Work Owners	EIS Management of Excavated Soil at PKSW	Laboratory Reports Waste Transport Certificates
Vehicles will be restricted to existing access routes where practical	Construction	All areas	Construction Manager	EIS Traffic Management Plan	Audits/Inspections
Disturbed areas will be returned to pre-existing condition following the completion of construction, where practicable.	Completion of Construction	All disturbed areas	Work Owner	EIS	Project Schedule Audits/Inspections
A Flood Emergency Response Plan will be developed in consultation with DPE's Biodiversity and Conservation Division	Pre-construction	All areas	Project Manager Environmental Advisor	Approval Condition	Flood Emergency Response Plan
Water monitoring programs under licencing or approval conditions will continue during operation.	Operation	Water discharge locations	Environmental Advisor	EIS	Laboratory Analysis results
<b>Traffic</b>					
A Construction Traffic Management Plan (CTMP) will need to be prepared prior to the commencement of works. The CTMP will provide: <ul style="list-style-type: none"> <li>- Measures to minimise the impact of the construction vehicle traffic on the overall operation of the road network.</li> <li>- Measures to provide continuous, safe, and efficient movement of traffic for both the general public and construction workers.</li> </ul>	Pre-construction	All areas	Construction Manager	Approval Condition EIS	Construction Traffic Management Plan

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<ul style="list-style-type: none"> <li>- Details regarding installation of appropriate advance warning signs to inform users of the changed traffic condition.</li> <li>- A description of the construction vehicles and the volume of these construction vehicles accessing the construction site.</li> <li>- Information regarding access arrangements and a description of the proposed external routes for vehicles, including the construction vehicles, accessing the site.</li> <li>- That all staff and subcontractors engaged on site will be required to undergo site induction. The induction will outline the requirements on the CTMP, including site access routes, environmental and occupational health and safety responsibilities, emergency procedures, potential carpooling opportunities and vehicle height restriction under the power lines, among others.</li> </ul>					
Key stakeholders, including owners/operators of adjacent lands and emergency service providers, will be notified of any changes to the traffic management arrangements of public roads prior to the commencement of works.	Pre-construction	Roadways	Construction Manager Project Manager	EIS Construction Traffic Management Plan	Correspondence
The construction site access will be reviewed during design development to consider the turn path required for the construction vehicles. Truck drivers will be directed to follow the predetermined haulage routes.	Pre-construction	Roadways	Construction Manager Project Manager	EIS Construction Traffic Management Plan	Design reviews
Workers required to undertake works or traffic control will be suitably trained and hold the required accreditation to carry out works on site and will also be site inducted.	Construction	Roadways	Construction Manager	EIS	Accreditation Training Records

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
Protection will be provided to workers and road users through advanced warning of roadworks, speed changes, safety barriers with adequate offsets and deflection allowance, where necessary.	Construction	Roadways	Construction Manager	EIS Construction Traffic Management Plan	Correspondence
Site access will be restricted to authorised project personnel and existing employees on site.	Construction	All areas	Construction Manager	EIS	Audits/inspections
Roadwork speed zones must be logical, credible, and enforceable. They should only be used where they are self-enforcing or will be enforced.  Roadwork speed zones will be used with traffic control signs and devices and should not be used in place of more effective traffic controls. They will be used only while road works are in progress or the lower speed road conditions exist.	Construction	Roadways	Construction Manager	EIS Construction Traffic Management Plan	Correspondence
The following environmental requirements should be adhered to: <ul style="list-style-type: none"> <li>- All vehicles transporting loose materials on public roads will have the entire load covered and/or secured to prevent any large items, excess dust or debris depositing onto the roadway during travel to and from the site, including but not limited to construction rumble strips/wheels wash at the site egress location.</li> <li>- Vehicles operating to, from and within the site shall do so in a manner, which does not create unreasonable or unnecessary noise or vibration.</li> <li>- Public roads and access points will not be obstructed by any materials, vehicles, refuse skips or the like.</li> </ul>	Construction	Roadways	Construction Manager Project Manager	EIS Construction Traffic Management Plan	Audits/Inspections

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
Onsite parking will be provided for heavy vehicles and site personnel	Construction	Parking	Project Manager	Approval Condition	Site induction
<b>Soils, Geology, and Groundwater</b>					
If ASS are disturbed during excavations, they will be managed as per the Acid Sulphate Soils Manual (ASS MAC, 1998).	Construction	All areas with excavation	Work Owners	EIS Management of Excavated Soil at PKSW	Geotechnical surveys JSEA/SWMS
An incident emergency spill plan will be detailed in the <b>GEMP Emergency Response Plan</b> .	Pre-construction	All areas	Project Manager	EIS Emergency Response Plan Spill Response Guidelines	Audits/Inspections
Spill response kits will be provided on site and will be located in a clearly defined location.	Construction	All areas	Construction Manager	EIS Spill Response Guidelines	JSEA/SWMS Audits/Inspections
Plant and machinery will be inspected regularly to ensure that they are in sound working order.	Prior to use	All areas	Plant/machinery Operators	EIS	Pre-start checklists
If soils that appear to be contaminated are exposed during construction of the project, works will cease in the area until further investigation can be undertaken. The following factors are indications of potential contamination on site: <ul style="list-style-type: none"> <li>- Stained or discoloured fill</li> <li>- Hydrocarbon or chemical odour</li> </ul> Contaminated soils requiring disposal will be classified under the Waste Classification Guidelines (EPA,2014) prior to disposal.	Construction	All areas	Work Owners	EIS Unexpected Finds Procedure Management of Waste Material	Laboratory Reports Waste Transport Certificates

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
All chemical/fuel storage and loading areas will be banded or otherwise contained.	Construction and operation	Chemical/fuel storage and loading areas	Construction Manager	EIS Environment Requirements for Banding of Storage Tanks	Audits/Inspections
All plant personnel that may encounter chemicals/fuels will be trained in required handling procedures.	Construction and operation	All areas	HSE Coordinator	EIS Training Needs Analysis	Training Records
<b>Biodiversity</b>					
Measures proposed in the SWMP will be implemented to ensure appropriate sediment control measures are put in place to ensure run-off during construction does not result in indirect impacts to surrounding habitats. Clearing of trees will be restricted to the trees identified in the Tree Clearing Report. Laydown areas will be placed on existing hardstand, and where possible, as far away from drainage lines and places where surface water can pool. These measures will be implemented in the CEMP and may be revised at any time to manage potential environmental impacts.	Pre-construction	All areas	Environmental Advisor Construction Manager	EIS	Soil and Water Management Plan
All measures outlined in Management of Threatened Species, The Green and Golden Bell Frog, Litoria Aurea (BlueScope, 2020) will be implemented during construction of the project.	Construction	All areas	Project Manager	Approval Condition EIS Management of Threatened Species, The Green and Golden Bell Frog, Litoria Aurea	Audits/Inspections as required

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
All relevant workers will be trained in the procedures outlined in Management of Threatened Species, The Green and Golden Bell Frog, Litoria Aurea (BlueScope, 2020) and their responsibilities under the BC Act and EPBC Act in the project induction. This will also be discussed periodically during the toolbox talks or through group refresher training sessions.	Construction	All areas	HSE Manager Project Manager	EIS Training Needs Analysis	Training records
If a Green and Golden Bell Frog is found in the project site or laydown area, work in the vicinity will cease immediately. Work will not recommence until clearance from a qualified ecologist can be provided. Following confirmation of the sighting of Green and Golden Bell Frog either by a local ecologist or by means of identification using the Green and Golden Bell Frog Audit / Inspection Checklist, the sighting must be registered with the EPA and NSW BioNet Species sightings via the web or telephone.	Construction	All areas	Environment Advisor	EIS Unexpected Finds Procedure Management of Threatened Species, The Green and Golden Bell Frog, Litoria Aurea	Incidents/Self-reports
If other endangered species are discovered on the project site or in laydown areas, work will cease in the vicinity and a qualified ecologist will be employed to assess the discovery. Additional mitigation measures presented by the ecologist will be incorporated into the EMP. Work in the area will not commence unless clearance is given by the ecologist.	Construction	All areas	Environment Advisor	EIS Unexpected Finds Procedure	Incidents/Self-reports
<b>Heritage</b>					
In the event of an unexpected find of potential Aboriginal object/s (or suspected item), work will cease in the area and DPE will be notified. Works will not recommence until continuation is authorised by DPE.	Construction	All areas	Work Owners	Approval Condition EIS	Incidents/Self-reports



## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
				Unexpected Finds Procedure	
In the unlikely event that unexpected historical (non-Aboriginal) archaeological remains are discovered during works they will be managed with reference to the standard protocols and procedures of section 146 of the Heritage Act 1977.	Construction	All areas	Work Owners	Approval Condition EIS Unexpected Finds Procedure	Incidents/Self-reports
<b>Visual Amenity</b>					
Temporary boarding, barriers, traffic management and signage will be removed when no longer required.	Post Construction	All areas	Construction Manager Project Manager	EIS Project Schedule	Audits/Inspections
Roads providing access to the site and work areas will be maintained free of dust and mud as far as reasonably practicable.	Construction	All areas	Construction Manager	EIS Dust Management Plan Traffic Management Plan	JSEA/SWMS Audits/Inspections
Materials and machinery will be stored neatly during construction works.	Construction	All areas	Construction Manager	EIS	JSEA/SWMS Audits/Inspections
Ensure any temporary lighting required during the construction period is sited and designed to avoid light spill into the surrounding area.	Construction	All areas	Work Owner	EIS	JSEA/SWMS Audits/Inspections
Utilise existing site features as screening when positioning plant where practical.	Construction	All areas	Work Owner	EIS	JSEA/SWMS
Lighting to be designed installed and operated in accordance with <i>Australian Standard 4282-1997 Control of the Obtrusive effects of outdoor lighting</i> .	Design and Operation	All areas	Engineering Manager	EIS	Design Specifications

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
<b>Land use and property</b>					
A EMS will be developed to manage and mitigate impacts generated by the construction of the project.	Pre-construction	All areas	Environmental Advisor Project Manager	EIS	Construction Environmental Management Strategy
BlueScope will coordinate project activities to minimise the impact to land use and services within the PKSW site.	Construction	All areas	Project Manager Construction Manager	EIS	Project internal Stakeholder Engagement and correspondence
BlueScope will consult with NSW Ports prior to works on Lot 71 DP1182824 and Lot 72 DP1182824.	Construction	All areas	Project Manager Construction Manager	EIS	Meeting minutes and other correspondence
<b>Social and economic</b>					
A contracting and procurement strategy focusing on maximising local content and implementation of BlueScope's First Nations Strategy for indigenous employment will be implemented where possible to support local employment and business opportunities during construction. During operation, the project will seek to work with interested local parties to fulfill workforce requirements.	Construction and Operation	All areas	Project Manager	EIS	Australian Industry Participation Plan reports
A Community Consultative Committee (CCC) will continue to be operated by BlueScope for PKSW.	Construction	All areas	Corporate Affairs Manager	EIS	Meeting minutes
BlueScope's public website will provide a contact number and email address for the community to provide comments on throughout the project.	Construction	All areas	Corporate Affairs Manager	EIS	Public Website
<b>Greenhouse gas and energy</b>					

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
All plant and equipment used during the construction works will be regularly maintained to comply with the relevant exhaust emission guidelines.	Construction	All areas	Construction Manager	EIS	Pre-start checklist Maintenance plans
Sustainable procurement practices will be adopted where feasible.	Construction	All areas	Project Manager	EIS	Purchase Order/Contract Terms & Conditions
Where reasonable and feasible, measures to be implemented by contractors will include, but not be limited to: <ul style="list-style-type: none"> <li>- Construction materials sourced locally where possible</li> <li>- Construction materials with high recycled content, such as supplementary cementitious materials in concrete, reclaimed asphalt pavement in asphalt and post post-consumer recycled content in steel will be procured for the project where practical</li> <li>- Construction materials that are low maintenance and durable will be sourced where practical</li> <li>- Plant and equipment will be switched off when not in constant use and not left idling</li> <li>- Plant and equipment brought onsite will be regularly serviced and energy efficient vehicles or equipment will be selected where available</li> <li>- Any plant and equipment that is not working efficiently (e.g. emitting excessive smoke) will be repaired or replaced as soon as possible</li> <li>- Construction works will be planned to ensure minimal movement of plant and equipment, including barges</li> <li>- Opportunities for the reuse/recycling of other construction and demolition waste materials to be</li> </ul>	Construction	All areas	Project Manager Construction Manager	EIS	Audits/inspections

## Commodity Logistics and Import Project SSI-36408005



Environmental Management Measure	Timing/ Frequency	Location	Responsibility	Source/Reference	Evidence
investigated and included in construction management plans, where feasible.					
<b>Waste</b>					
The project will comply with BlueScope's existing Waste Management Procedure (DIV-AR-RS-01)	Construction	All areas	All personnel	EIS Management of Waste Material	Audits/Inspections
Awareness of waste minimisation practices will be included in the project induction.	Construction	All areas	HSE Coordinator Environment Advisor	EIS	Project Induction
Waste will be classified, managed, and disposed of in accordance with the Waste Classification Guidelines (EPA, 2014).	Construction	All areas	Work Owners	EIS Management of Waste Material	Laboratory Reports Waste Transport Certificates
Operational waste streams will continue to be managed in accordance with EPL 6092.	Operation	All areas	Operations teams Environmental Advisor	EIS	Audits/Inspections Incidents/Self-report
Recycling and resource recovery activities will continue throughout the life of the project.	Operation	All areas	Operations teams Environmental Advisor	EIS	Business Improvement Projects

**Commodity Logistics and Import Project  
SSI-36408005**



## **Appendix 4. DPHI Environmental Management Plan Preparation Checklist**

<b>Requirement</b>	<b>Plan Reference</b>	<b>Yes / No / Not Applicable</b>
<b>Preparation and endorsement</b>		
Has the EMP been prepared in consultation with all relevant stakeholders as per the requirements of the conditions of consent? (Section 4.1)	Section 4.2	Yes
Have the views of the relevant stakeholders been taken into consideration? Have appropriate amendments been made to the EMP and does the EMP clearly identify the location of any changes? (Section 4.1)	Flood Emergency Response Plan	Yes
Has the EMP been internally approved by an authorised representative of the proponent or contractor? (Section 4.2)	Document Approval following Title Page	Yes
<b>Version and content</b>		
Does the EMP describe the proponent's Environmental Management System (EMS) (if any), and identify how the EMP relates to other documents required by the conditions of consent? (Section 3.5.1)	Section 5.1	Yes
Does the EMP include the required general content and version control information? (Section 3.1)	Section 5.2	Yes
Does the EMP have an introduction that describes the project, scope of works, site location and any staging or timing considerations? (Section 3.2)	Section 2	Yes
Does the EMP reference the project description? (Section 3.3)	Section 3	Yes
Does the EMP reference a Community and Stakeholder Engagement Plan (or similar) or include community and stakeholder engagement actions (if required)? (Section 3.4)	Section 4	Yes
Have all other relevant approvals been identified? Has appropriate information been provided regarding how each approval is relevant? (Section 4)	Section 0	Yes
Has the environmental management structure and responsibilities been included? (Section 3.5.2)	Section 5.3	Yes
Does the EMP include processes for training of project personnel and identify how training and awareness needs will be identified? (Section 3.5.3)	Section 5.5	Yes
Does the EMP clearly identify the relevant legal and compliance requirements that relate to the EMP? (Section 3.5.3)	Section 0	Yes
Does the EMP include all the conditions of consent to be addressed by the EMP and identify where in the EMP each requirement has been addressed? (Section 3.5.13)	Appendix 1	Yes

## Commodity Logistics and Import Project



Requirement	Plan Reference	Yes / No / Not Applicable
Have all relevant guidelines, policies and standards been identified, including details of how they are relevant? (Section 3.5)	Section 0	Yes
Is the process that will be adopted to identify and analyse the environmental risks included? (Section 3.5.5)	Section 6.1	Yes
Have all the environmental management measures in the EIA been directly reproduced into the EMP? (Section 3.5.7)	Appendix 3	Yes
Have any additional environmental management measures been included in the EMP? (Section 3.5.7)	Appendix 3	Yes
Have environmental management measures been written in committed language? (Section 3.5.7)	Appendix 3	Yes
Have project environmental management measures, including hold points, been identified and included? (Section 3.5.6)	Section 3.6	Yes
Are relevant details of environmental monitoring that will be carried out included? (Section 3.5.8)	Section 7.1	Yes
Have the components of any environmental monitoring programs been incorporated? (Section 3.5.8)	-	N/A
Are environmental inspections included? (Section 3.5.9)	Section 7.2	Yes
Does the EMP document all relevant compliance monitoring and reporting requirements for the project? (Section 3.5.12 and 3.5.13)	Section 7.3	Yes
Does the EMP describe the types of plans or maps (such as environmental control maps) that will be used to assist with the management of environmental matters on site? (Section 3.5.10)	-	N/A
Does the EMP list environmental management documents? (Section 3.5.11)	Section 5.2	Yes
Is an auditing program referenced? (Section 3.5.13)	Section 7.2	Yes
Does the EMP include the incident notification and reporting protocols that comply with the relevant conditions of consent? (Section 3.5.15)	Section 7.5	Yes
Does the EMP identify the project role/position that is responsible for deciding whether an occurrence is an incident? (Section 3.5.15)	Section 7.5	Yes
Does the EMP describe a corrective and preventative action process that addresses the requirements? (Section 3.5.16)	Section 7.4	Yes
Does the EMP include details of a review and revision process that complies with the requirements? (Section 3.6)	Section 7.6	Yes