



Document No: CO2262-SMW-EWNS-PLN-01
Title: Construction Environmental Management Plan (CEMP)
Contract: Sydney Metro West SSI-10038 Phase J EWNS - North Strathfield Electrical Kiosk Works
Job No: CO2262

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Terms and Definitions

The following terms, abbreviations and definitions are used in this plan:

Terms	Explanation
AA	Acoustic Advisor
CBD	Central Business District
OCCS	Overarching Community Consultation Strategy
CEMP	Construction Environmental Management Plan
CEMF	Construction Environmental Management Framework
CNVMP	Construction Noise and Vibration Management Plan
CoA	Conditions of Approval
DPHI	Department of Planning, Housing and Infrastructure
ECM	Environmental Control Map
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EPA Act	Environmental Planning and Assessment Act 1979
EPA	Environment Protection Authority
EPL	Environmental Protection Licence
ER	Environmental Representative
EWNS	Enabling Works North Strathfield (the Project)
HSE	Health Safety and Environment
HSEQ	Health Safety Environment and Quality
ICNG	Interim Construction Noise Guidelines
OEH	Environment and Heritage – part of the Department of Climate Change, Energy, the Environment and Water.
OHW	Overhead Wiring
OOHW	Out of Hours Works
POEO Act	Protection of the Environment Operations Act 1997
SMW	Sydney Metro West
SWMS	Safe Work Method Statement
TfNSW	Transport for New South Wales
CTMP	Construction Traffic Management Plan

Table1: CEMP Alignment with MCoA

CEMP Section	Ref	Source	Condition Requirement	How Addressed / Compliance Approach
9.1 Noise & Vibration	D34	MCoA	A detailed land use survey must be undertaken to confirm sensitive receivers (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration and construction ground-borne noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of work which generates construction noise, vibration or ground-borne noise in that area. The results of the survey must be included in the Noise and Vibration CEMP Sub-plan required under Condition C5 of this schedule.	Land use survey to be undertaken prior to works. Results included in CNVMP.
9.1 Noise & Vibration	D35	MCoA	Work must only be undertaken during the following hours: (a) 7:00am–6:00pm Mon–Fri; (b) 8:00am–6:00pm Sat; (c) no work on Sundays/public holidays.	Standard construction hours adopted. OOHW managed under CNVMP and Out of Hours Protocol.
9.1 Noise & Vibration	D36	MCoA	Except as permitted by an EPL, highly noise intensive work that results in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) 8:00am–6:00pm Mon–Fri; (b) 8:00am–1:00pm Sat; (c) if continuous, not exceeding 3 hrs, with a 1 hr cessation.	Managed via CNVMP and scheduling; respite provisions applied.
9.1 Noise & Vibration	D37	MCoA	Notwithstanding D35 and D36, work may occur outside hours in circumstances of (a) Safety/Emergencies; (b) Low Noise Impact Work; (c) By Approval (EPL, OOHW Protocol, agreements); (d) Prescribed Activity (tunnelling, batching, spoil haulage, etc.).	CEMP summarises allowable exceptions; CNVMP and OOHW Protocol provide details.
9.1 Noise & Vibration	D39	MCoA	All reasonable and feasible mitigation measures must be implemented with the aim of achieving: (a) ICNG 2009 noise levels; (b) DEC 2006 vibration criteria (human exposure); (c) AS 2187.2-2006 (blasting); (d) BS 7385 Part 2-1993 (building vibration); (e) DIN 4150-3 (heritage structures).	CNVMP and DNVIS address criteria; CEMP summarises adoption of standards.
9.1 Noise & Vibration	D40	MCoA	All reasonable and feasible mitigation measures must be applied when residential ground-borne noise exceeds: (a) Evening (6–10pm) LAeq(15min) 40 dB(A); (b) Night (10pm–7am) LAeq(15min) 35 dB(A).	Managed under CNVMP and OOHW Protocol.
9.1 Noise & Vibration	D41	MCoA	Noise generating work in the vicinity of sensitive institutions (community, religious, educational, laboratories, etc.) resulting in exceedances must not be timetabled within sensitive periods, unless agreements are made.	Consultation with institutions prior to scheduling. Documented in CNVMP.

CEMP Section	Ref	Source	Condition Requirement	How Addressed / Compliance Approach
9.1 Noise & Vibration	D42	MCoA	Industry best practice construction methods must be implemented where reasonably practicable, including: (a) low sound power equipment; (b) temporary barriers; (c) alternative techniques.	Incorporated into CNVMP; best practice methods applied.
9.1 Noise & Vibration	D43	MCoA	DNVIS must be prepared for any work that may exceed NMLs/vibration/ground-borne noise outside hours or for highly affected receivers. Must include mitigation identified via consultation.	DNVIS prepared for applicable works.
9.1 Noise & Vibration	D44	MCoA	DNVIS must be prepared for each construction site before noise/vibration impacts commence, including consultation-based mitigation.	Requirement implemented via CNVMP.
9.1 Noise & Vibration	D45	MCoA	Owners/occupiers of properties at risk of exceeding cosmetic damage screening criteria must be notified prior to works. If recurrent, monthly schedules must be provided.	Communication strategy integrated into CNVMP.
9.1 Noise & Vibration / 9.5 Heritage	D46	MCoA	Vibration testing must be conducted during vibration-generating activities that could impact heritage items to establish minimum working distances. If exceeded, methodologies must be reviewed and modified.	Managed under CNVMP with heritage specialist input.
9.5 Heritage	D47	MCoA	Advice from a heritage specialist must be sought on methods and locations for vibration/noise monitoring at heritage items.	Heritage specialist engaged where required.
9.5 Heritage	D49	MCoA	If a Heritage item is structurally unsound, apply conservative cosmetic damage criterion of 2.5 mm/s PPV (DIN 4150).	Adopted in CNVMP and heritage assessments.
9.1 Noise & Vibration	D50	MCoA	All work must be coordinated to ensure respite periods are provided. Respite must consider cumulative impacts from other projects.	Respite planning undertaken in CNVMP.
9.1 Noise & Vibration	D51	MCoA	To undertake OOHV, appropriate respite must be identified in consultation with the community. Schedules (≥3 months) provided to community, ER, AA.	Community consultation and reporting through CNVMP and OOHV Protocol.
9.1 Noise & Vibration	NV01–NV18	REMMs	Mitigation measures covering: community preference, alternative methodologies, respite, OOHV, traffic noise, sleep disturbance, heritage monitoring, building condition surveys, and cumulative impacts.	Incorporated into CNVMP and CEMP summary.
9.3 Soil & Water	D116	MCoA	Before undertaking any works and during construction, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Landcom's <i>Blue Book</i> .	Erosion/sediment controls implemented and maintained; listed in CEMP.
9.3 Soil & Water	SSWQ3	REMM	Erosion/sediment measures per <i>Blue Book Vol 1 & 2D</i> . Water collected must be treated before discharge. Temporary basins designed to <i>Blue Book</i> standard.	Controls described in CEMP; no external SWMP required.

CEMP Section	Ref	Source	Condition Requirement	How Addressed / Compliance Approach
9.4 Waste & Spoil	D111	MCoA	Waste generated must be dealt with per hierarchy: (a) avoid; (b) reuse/recycle; (c) treat/dispose.	Adopted in waste/spoil section of CEMP.
9.4 Waste & Spoil	D112	MCoA	Importation/storage/processing/disposal of waste must comply with EPL or Resource Recovery Exemption/Order.	All waste managed under EPL/Resource Recovery requirements.
9.4 Waste & Spoil	D113	MCoA	Waste must only be exported to EPA-licensed facilities or lawful sites.	Waste disposal dockets retained; transport to licensed sites only.
9.4 Waste & Spoil	D114	MCoA	Waste must be classified in accordance with EPA Waste Classification Guidelines. Records retained for audit.	Classification and records procedure described.
9.4 Waste & Spoil	WR1–WR5	REMMs	Waste classified, managed, transported, disposed lawfully. Minimise waste; segregate streams; track materials between sites.	Implemented through site waste register and CEMP measures.
9.5 Heritage	D13	MCoA	Proponent must not destroy/modify any Heritage item not identified in A1 documents. Unexpected finds managed per D31–D33.	Unexpected Finds Procedure implemented.
9.5 Heritage	D19	MCoA	All reasonable steps must be taken not to harm Aboriginal objects except as authorised.	Avoidance prioritised. Unexpected finds protocol in place.
9.5 Heritage	D20	MCoA	Registered Aboriginal Parties must be kept informed and consulted on Aboriginal heritage management.	Sydney Metro facilitates RAP consultation. Contractor supports process.
9.5 Heritage	D24	MCoA	Where unidentified Aboriginal objects are discovered, stop work and engage heritage expert. Include AHIMS registration where relevant.	Unexpected Finds Procedure includes Aboriginal finds process.
9.5 Heritage	D31	MCoA	Unexpected Heritage Finds and Human Remains Procedure must be prepared.	Sydney Metro procedure adopted; contractor inducts workers.
9.5 Heritage	D33	MCoA	Unexpected Finds and Human Remains Procedure must be implemented for duration of construction.	Implemented via inductions and site controls.
9.5 Heritage	AH3	REMM	If Aboriginal archaeological remains are recovered, results incorporated into interpretation in consultation with RAPs.	Managed by Sydney Metro with RAPs; contractor facilitates.
9.5 Heritage	AH4	REMM	If potential human remains are exposed, Sydney Metro Exhumation Management Plan must be implemented.	Procedure adopted; police/Coroner notified as required.
9.2 Air Quality & Dust	Air Quality – MCoA	MCoA	All reasonably practicable measures must be implemented to minimise dust and air pollutant emissions during construction.	Controls set out in CEMP: watering, stockpile management, covering loads, dust screens, plant maintenance, monitoring.
9.6 Flora & Fauna	C-B8	MCoA	As many mature trees as practicable must be retained. Net increase in mature trees at 2:1 ratio provided prior to operation.	Works minimise tree loss. Offset planting by Sydney Metro.
9.6 Flora & Fauna	C11	MCoA	Flora & Fauna CEMP Sub-plan must include: (a) site-specific measures; (b) Southern Myotis habitat checks; (c) Clyde mangrove protection; (d) improved clearance methods.	Addressed via tree protection procedure and fauna pre-clearance.



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CEMP Section	Ref	Source	Condition Requirement	How Addressed / Compliance Approach
9.6 Flora & Fauna	D2	MCoA	Clearing of native vegetation must be minimised to greatest extent practicable.	Clearing minimised. Progressive reinstatement.
9.6 Flora & Fauna	D9	MCoA	As many mature trees/urban canopy as practicable must be retained. Canopy trimming considered prior to removal.	Tree Protection Procedure implemented.
9.6 Flora & Fauna	LV13	REMM	Trees removed must be replaced to achieve no net loss in number/canopy in long term.	Offset planting through Sydney Metro program.
9.7 Soils & Contamination	D77	MCoA	An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared prior to construction.	Procedure included in CEMP.
9.7 Soils & Contamination	D78	MCoA	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	Implemented through site inductions and controls.
Table: CEMP Alignment with CEMF	C1	MCoA	Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 of this schedule to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 of this schedule will be implemented and achieved during construction.	Develop CEMP in alignment with CEMF
12.2 CEMP and subplan review/update procedures	C2	MCoA	With the exception of any CEMPs expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMPs must be submitted to the Planning Secretary for approval.	CEMP endorsement by ER
12.2 CEMP and subplan review/update procedures	C3	MCoA	The CEMP(s) not requiring the Planning Secretary's approval must be submitted to the ER for endorsement no later than one (1) month before the commencement of construction or where construction is phased no later than one (1) month before the commencement of that phase. That CEMP must obtain the endorsement of the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1 of this schedule.	On time submission to ER
12.2 CEMP and subplan review/update procedures	C4	MCoA	Any CEMP to be approved by the Planning Secretary must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction or where construction is phased no later than one (1) month before the commencement of that phase.	On time submission to ER
2.3 Subplans 12.2 CEMP and subplan	C5	MCoA	Of the CEMP Sub-plans required under Condition C1 of this schedule, the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies	Review external consultation requirements in collaboration with ER.

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CEMP Section	Ref	Source	Condition Requirement	How Addressed / Compliance Approach
review/update procedures			identified for each CEMP Sub-plan. Details of issues raised by a government agency during consultation must be included in the relevant CEMP Sub-plan, including copies of all correspondence from those government agencies as required by Condition A6 of this schedule. Where a government agency (ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why: (a) Noise and vibration Sub-plan; consult with SOPA (in respect of Sydney Olympic Park), Place Management NSW (in respect of The Bays) and Relevant Council(s) (b) Flora and fauna Sub-plan; consult with DPE BCD, DPI Fisheries, SOPA (in respect of Sydney Olympic Park) and Relevant Council(s) (c) Soil and water Sub-plan; consult with DPE BCD, Relevant Council(s), SOPA (in respect of Sydney Olympic Park) and Sydney Water (if Sydney Water's assets are affected) (d) Heritage (Non-Aboriginal and Aboriginal) Sub-plan; consult with Heritage NSW, SOPA (in respect of Sydney Olympic Park), Place Management NSW (in respect of The Bays) and Relevant Council(s) (e) Spoil Sub-plan; consult with Relevant Council(s) and SOPA (in respect of Sydney Olympic Park)	
2.3 Subplans 12.2 CEMP and subplan review/update procedures	C6	MCoA	The CEMP Sub-plans must state how: (a) the environmental performance outcomes identified in the documents listed in Condition A1 of this schedule will be achieved; (b) the mitigation measures identified in the documents listed in Condition A1 of this schedule will be implemented; (c) the relevant conditions of this approval will be complied with; and (d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	Develop subplans with consideration of these requirements
12.2 CEMP and subplan review/update procedures	C7	MCoA	With the exception of any CEMP Sub-plans expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMP Sub-plans must be submitted to the Planning Secretary for approval.	Review external consultation requirements in collaboration with ER.

CEMP Section	Ref	Source	Condition Requirement	How Addressed / Compliance Approach
2.3 Subplans 12.2 CEMP and subplan review/update procedures	C8	MCoA	The CEMP Sub-plans not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all relevant undertakings made in the documents listed in Condition A1 of this schedule. Any of these CEMP Sub-plans must be submitted to the ER with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is phased no later than one (1) month before the commencement of that phase.	Timely submission to ER
2.3 Subplans 12.2 CEMP and subplan review/update procedures	C9	MCoA	Any of the CEMP Sub-plans to be approved by the Planning Secretary must be submitted to the Planning Secretary with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is phased no later than one (1) month before the commencement of that phase.	Timely submission to ER
11.2 Obligations Register 12.2 CEMP and subplan review/update procedures	C10	MCoA	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction. Where construction of Stage 1 of the CSSI is phased, construction of a phase must not commence until the CEMP and CEMP Sub-plans for that phase have been approved by the Planning Secretary or endorsed by the ER upon nomination by the Planning Secretary (whichever is applicable).	Timely submission to ER. Review of obligations prior to commencement of construction
6.3 Monitoring, Inspections and Reporting	C14	MCoA	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each to compare actual performance of construction of Stage 1 of the CSSI against the performance predicted in the documents listed in Condition A1 of this schedule or in the CEMP: (a) Noise and vibration Monitoring program; consult with EPA, SOPA (in respect of Sydney Olympic Park), Place Management NSW (in respect of The Bays) and Relevant Council(s)	Not Applicable – No construction monitoring programs required by phasing report. Some environmental monitoring will be undertaken for due diligence, reporting, complaint management etc.



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			<p>(b) Blasting Monitoring program; consult with SOPA (in respect of Sydney Olympic Park), Place Management NSW (in respect of The Bays) and Relevant Council(s)</p> <p>(c) Surface water quality Monitoring program; consult with DPE Water, Relevant Council(s) and Sydney Water (if any Sydney Water assets are impacted)</p> <p>(d) Groundwater Monitoring program; consult with DPE Water and SOPA (in respect of Sydney Olympic Park)</p> <p>Note: The Blasting Construction Monitoring Program is only required to be prepared if blasting is proposed to be conducted during construction.</p>	

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Table 2: CEMP Alignment with CEMF

CEMF Reference	CEMF Requirement	CEMP Section	Title / Subsections
1 Introduction; 1.1–1.3	Provide an introduction and overview of the project and its context within the Sydney Metro West program.	1	Introduction
–	Describe the project background and purpose.	1.1	Project Overview
3.4 Construction Environmental Management Plan	Define the scope and structure of the Construction Environmental Management Plan.	1.2	Scope of CEMP
3.1 Environmental & Sustainability Management System	Describe relationship with the contractor's Environmental Management System (EMS) and ISO 14001 certification.	1.3	Relationship with Syscon IBMS
1.1 Purpose & Scope; 1.3 Policy	State the purpose and objectives of the CEMP and policy commitments.	1.4	Purpose & Objectives
3.4–3.5 CEMP & Subplans	Outline structure of the CEMP and its associated subplans and appendices.	1.5	Structure of Plan
2 Legislative & Other Requirements	Identify relevant statutory and other obligations.	2	Statutory Context
Entire Document	Demonstrate understanding of the Construction Environmental Management Framework (CEMF) and its integration.	3	CEMF Overview
–	Define the scope of works to which the CEMP applies.	4	Scope of Works
3.4(e); 3.12 ER Role	Detail review and approval requirements, including the Environmental Representative's role.	5	Review & Approval
3.13 Roles & Responsibilities	Identify roles, accountabilities, and reporting lines for internal consultation.	5.1	Internal Consultation
3.4(e); 3.12 Independent ER	Identify requirements for external consultation and ER involvement.	5.2	External Consultation
3.4(e) CEMP approval by DPHI	Detail approval pathways and regulatory endorsement requirements.	5.3	Approval
3.4–3.5 CEMP & Subplans	Describe the environmental management framework for planning, implementation, monitoring, and review.	6	Environmental Management Plan
3.1 EMS; 3.7 Additional Assessments	Describe environmental planning processes and integration with risk assessment and approvals.	6.1	Planning
3.6 Procedures & ECMs	Describe implementation of controls and procedures, including ECMs.	6.2	Implementation
3.14 Monitoring, Inspections, Auditing	Detail monitoring, inspection, and auditing processes to verify compliance.	6.3	Monitoring, Inspection & Auditing
3.16 Environmental Records & Compliance Reporting	Describe environmental reporting processes and compliance tracking.	6.4	Reporting
3.17 Review & Improvement	Define processes for review, continuous improvement, and updates to the CEMP.	6.5	Review & Continuous Improvement
3.13 Roles & Responsibilities	Outline roles, accountabilities, and communication structure.	7	Roles & Responsibilities
3.1 EMS Risk Identification	Identify environmental aspects, impacts, and associated risk management processes.	8	Aspects & Impacts
3.5 Subplans; Sections 6–14	Provide detailed environmental control measures via issue-specific subplans.	9	Environmental Control Measures
8 Noise & Vibration (8.1–8.2)	Manage noise and vibration impacts through CNVMP and controls.	9.1	Noise & Vibration



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13 Air Quality (13.1–13.2)	Manage dust and air quality impacts in accordance with CEMF Section 13.	9.2	Air Quality & Dust
7 Groundwater; 12 Soil & Water (12.1–12.2)	Manage erosion, sediment, groundwater and stormwater impacts.	9.3	Soil & Water (incl. Groundwater)
6 Spoil (6.1–6.2); 14 Waste (14.1–14.2)	Manage waste, spoil, and resource efficiency consistent with hierarchy principles.	9.4	Spoil & Waste
9 Heritage (9.1–9.2)	Protect Aboriginal and non-Aboriginal heritage and manage unexpected finds.	9.5	Heritage & Unexpected Finds
10 Flora & Fauna (10.1–10.2)	Protect and manage flora, fauna, and habitat values.	9.6	Flora & Fauna
11 Visual Amenity (11.1–11.2)	Manage visual impacts, lighting, and site presentation.	9.7	Visual Amenity
4 Stakeholder & Community Involvement (4.1–4.5)	Manage community and stakeholder engagement in line with OCCS.	9.8	Community & Stakeholders
3.2 Sustainability Management Plan (SMP1–SMP32)	Manage sustainability outcomes and resource efficiency commitments.	9.9	Sustainability
3.11 Emergency & Incident Response	Define emergency and incident response procedures and reporting.	10	Incident & Emergency Management
3.14–3.16 Monitoring, Non-compliance, Records	Establish compliance tracking, auditing, and corrective action processes.	11	Compliance Management
3.16 Records; 3.17 Review; 19 (Policy App.)	Define document control, review, and recordkeeping processes.	12	Document Control & Records
3.16(a–d) Records & Reporting	Describe document control processes for environmental management documentation.	12.1	Document Control
3.17 Review & Improvement	Define review and update processes for continuous improvement.	12.2	Review / Updates
3.16(a–d)	Specify recordkeeping procedures.	12.3	Recordkeeping
3.16(b–c)	Define retention and accessibility of records.	12.4	Retention & Access
Throughout (esp. 2.3 Standards & Guidelines; App A Policy)	Provide references to standards, legislation, and policies used in developing the CEMP.	13	References
3.5 Subplans; Table 6 Hold Points	Include appendices supporting subplans, registers, and compliance tools.	14	Appendices
–	Include matrix of Conditions of Approval.	App A	CoA Matrix
3.1 Risk Identification	Include aspects and impacts register with risk analysis.	App B	Aspects & Impacts Register
3.6 ECMs	Include Environmental Control Maps.	App C	Environmental Control Maps
3.4(d)(iv); 3.17 Review	Include objectives, KPIs, and compliance matrix.	App D	Objectives, KPIs & Compliance
3.9 Register of Hold Points	Include Environmental Hold Points register.	App E	Environmental Hold Points
4.2–4.5 OCCS	Include consultation and community engagement records.	App F	Consultation Records
2.1–2.2; 3.4(c)	Include approvals, permits, and licences register.	App G	Approvals, Permits & Licences
3.11 Incident Response; 4.3 Complaints	Include incident and complaints registers.	App H	Incident & Complaints Register
3.10 Training & Awareness	Include training and induction records.	App I	Training & Induction Records

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3.14 Auditing & Inspections

Include audit and inspection reports.

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Audit & Inspection Reports

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1. Introduction

1.1 Project Overview

Sydney Metro West

Sydney Metro West is a major infrastructure project that will deliver a new 24-kilometre underground metro rail line between Westmead and the Sydney CBD. It is designed to double rail capacity between the two centres, cut travel times, and support population growth across Greater Sydney. The project includes new stations at key precincts such as Parramatta, Sydney Olympic Park, North Strathfield, and the CBD, and integrates with existing Sydney Metro and heavy rail networks.

Enabling Works North Strathfield (EWNS)

EWNS refers to the enabling works at North Strathfield, focused on delivering an electrical kiosk to supply high-voltage power for subsequent tunnelling and station works. The package involves locating and protecting existing services, trenching for low-voltage cabling, installing the kiosk and its internal reticulation, and preparing for future power outages and connections. Scheduled for mid-to-late 2025, these works are essential to ensure reliable power distribution for ongoing construction and were procured under a dedicated design-and-construction contract.

1.2 Statutory Context

The Sydney Metro West project, including the EWNS, is being delivered under the planning approval (CSSI 10038) granted by the NSW Government in accordance with the Environmental Planning and Assessment Act 1979 (EP&A Act). The project was declared Critical State Significant Infrastructure (CSSI), meaning it is subject to a comprehensive assessment and approval pathway that streamlines delivery while ensuring environmental, social, and heritage protections. Conditions of approval require the project to comply with the Infrastructure Approval (IA) issued by the Minister for Planning, supported by a suite of management plans and monitoring frameworks such as the Construction Environmental Management Framework (CEMF), Construction Noise and Vibration Management Plan (CNVMP), and relevant sub-plans for community engagement and heritage.

The North Strathfield kiosk works specifically fall within the approved project boundary and must be undertaken in compliance with the CSSI conditions and relevant codes, **standards, and utility requirements. This includes managing interfaces with Ausgrid's** high-voltage electrical network, protecting existing underground services, and working in accordance with SafeWork NSW regulations and the Work Health and Safety Act 2011. The statutory framework requires Sydney Metro and its contractors to prepare and implement site-specific environmental controls, including noise, traffic, and vibration mitigation, and to maintain ongoing consultation with local residents, businesses, and stakeholders as part of the project's statutory obligations.

In addition, the works must align with broader legislative and policy frameworks such as the Protection of the Environment Operations Act 1997, governing noise, vibration, and air quality emissions, and the Roads Act 1993, which applies to temporary road and footpath occupation during trenching and kiosk installation.

1.3 Sydney Metro Construction Environment Management Framework

The Sydney Metro Construction Environmental Management Framework (CEMF) is the overarching document that sets out how environmental and sustainability requirements are to be managed during the delivery of Sydney Metro projects. Developed to satisfy the Conditions of Approval under the Environmental Planning and Assessment Act 1979, the CEMF establishes minimum standards, procedures, and responsibilities for contractors to follow throughout construction. It provides a structured approach for managing key risks such as noise and vibration, air quality, traffic and access, soil and water, heritage, and community impacts. The framework requires contractors to prepare and implement detailed Construction Environmental Management Plans (CEMPs) and issue-specific sub-plans, ensuring that site activities remain compliant with statutory obligations, licensing requirements, and environmental performance outcomes. In doing so, the CEMF functions as a governance tool that integrates statutory approvals with on-the-ground construction practices, while maintaining transparency and accountability through monitoring, reporting, and community consultation processes.

2. Scope


This Construction Environmental Management Plan (CEMP) applies to the design and construction activities associated with the **EWNS**. The scope covers all works required to deliver and commission the electrical kiosk, including but not limited to:

- **Pre-construction activities:** site establishment, hoarding adjustments (installed by previous contractor), survey and service location, and utility protection.
- **Civil and electrical works:** trenching and installation of low-voltage conduits, placement of the kiosk unit and associated reticulation, internal fit-out, and preparation for high-voltage connection works.
- **Supporting works:** traffic and pedestrian management, temporary road and footpath occupation, spoil handling and disposal, and coordination of utility outages.
- **Environmental controls:** implementation of noise, vibration, dust, erosion and sediment, waste, and hazardous materials management measures in accordance with the project's statutory approvals and Sydney Metro's Construction Environmental Management Framework (CEMF).
- **Community and stakeholder interface:** management of communication protocols with residents, businesses, and local authorities, including notification of construction impacts and access arrangements.

This CEMP applies for the duration of the EWNS works program, anticipated between **August 2025 and March 2026**, and will remain in force until all construction activities have been completed and demobilisation of the site is finalised. The plan sets out the procedures, roles, and responsibilities for ensuring compliance with legislative requirements, Sydney Metro's environmental approval conditions, and the environmental performance outcomes established for the project

2.1 Integrated Business Management System (IBMS) overview

This Construction Environmental Management Plan (CEMP) forms part of **Syscon's ISO 14001:2015 certified Integrated Business Management System**, which incorporates the company's Environmental Management System. As such, the CEMP aligns with Syscon's established processes for environmental planning, risk management, compliance monitoring, and continual improvement. The integration of this plan within the certified management system provides assurance that the works will be undertaken in accordance with international best practice, statutory obligations, and the environmental performance outcomes required under the Sydney Metro West project approvals.

CEMF Requirement	Compliance
3.1 – ISO 14001 Certification	Certification to ISO 14001 is maintained
<div> <div>Type of Certification</div> <div>Management Systems</div> </div> <div> <div>Status</div> <div>Active</div> </div> <div> <div>Organisation Name</div> <div>Systems Construction Pty Ltd</div> </div> <div> <div>Suburb / City</div> <div>North Wyong</div> </div> <div> <div>Country</div> <div>Australia</div> </div> <div> <div>Certification Description</div> <div>Provision of construction and maintenance services for electrical distribution infrastructure.</div> </div> <div> <div>Original Certification Date</div> <div>22/11/2013</div> </div> <div> <div>Current Certification Date</div> <div>18/09/2023</div> </div> <div> <div>Certification Expiry Date</div> <div>14/09/2026</div> </div> <div>  </div>	

2.2 CEMP Role

The CEMP provides the primary framework for managing environmental risks, compliance obligations, and performance outcomes associated with the delivery of the EWNS scope of works. It outlines the measures, controls, and monitoring processes to be implemented during construction to prevent or minimise environmental harm and to ensure compliance with legislative requirements and the Sydney Metro West approval conditions. The CEMP translates approval and policy requirements into practical, site-specific actions that guide day-to-day environmental management on the project site. This ensures that environmental considerations are fully integrated into planning, design, and construction activities, supporting the safe and compliant delivery of the works. The CEMP has been developed in accordance with the Sydney Metro Construction Environmental Management Framework (CEMF) to ensure that all environmental requirements are effectively implemented and maintained throughout the delivery of the project.

2.3 Subplans

A series of **environmental subplans** support this CEMP. Each subplan addresses specific environmental aspects relevant to the EWNS and will be either **included within this CEMP (section 9)** or **attached as an external document**, depending on project and client requirements.

Table 3: Subplans

Subplan	CoA Reference	CEMP Reference	CEMF Reference	External or within CEMP
Spoil Management (Sustainability/Resource Efficiency)	WR1-4, 5	9.10	6	CEMP
Noise and Vibration Management	D45; C5	9.1	8	External
Heritage Management	D24; C5	9.5	9	CEMP
Flora and Fauna Management	C11	9.7	10	CEMP
Visual Amenity Management	LV1-3, 5-6, 11-14	9.6	11	CEMP
Soil and Water Management	D116	9.3; 9.8	12	CEMP
Air Quality Management	AQ1-3; D1	9.2	13	CEMP
Waste Management	WR1-4, 5	9.4	14	CEMP
Community and Stakeholder Engagement	D70	9.9	4	CEMP
Sustainability/Resource Efficiency (Waste Management)	WR1-4, 5	9.10	14	CEMP
Traffic Management	D80, 81, 83, 85-87	-	5.2	External

3. Purpose and Objectives

3.1 Purpose

The purpose of this CEMP is to establish the framework for managing environmental risks, obligations, and performance outcomes during the delivery of the EWNS. This plan provides a structured approach to ensuring compliance with statutory approvals, contractual requirements, and Sydney Metro's Construction Environmental Management Framework (CEMF). It sets out the procedures, controls, and responsibilities necessary to minimise environmental impacts, protect community and stakeholder interests, and support sustainable project delivery. The CEMP also serves as a reference document for project personnel, regulators, and stakeholders, demonstrating Syscon's commitment to environmental protection and continual improvement throughout the lifecycle of the works.

3.2 Objectives

3.2.1 Objectives overview

The objectives of this CEMP have been developed to provide a clear and measurable framework for managing the environmental aspects of the EWNS. Setting defined objectives ensures that environmental performance is proactive, transparent, and auditable, and that the project team has clear benchmarks against which success can be monitored and verified.

These objectives have been aligned directly with the CEMF, which identifies the key environmental themes that must be addressed during project delivery, including noise and vibration, air quality, soil and water, waste and spoil, heritage, community and stakeholder engagement, and sustainability. By linking project objectives to the CEMF, Syscon ensures that this CEMP demonstrates traceability between higher-level obligations and site-specific management outcomes.

3.2.2 Environmental Objectives and KPI's

The following table sets out the project's environmental objectives, their alignment with the CEMF, and the associated key performance indicators, responsibilities, and evidence requirements that will be used to monitor and verify compliance.

Table 4: Environmental Objectives

Objective	Key Performance Indicators (KPIs)	Responsible Role	Evidence / Records
Noise and Vibration – Prepare and implement a CNVMP; comply with criteria; undertake monitoring.	100% compliance with approved noise/vibration criteria; Monitoring completed as per CNVMP schedule; Non-compliances reported and closed out within timeframe.	Environmental Manager / Site Supervisor	CNVMP; Noise/vibration monitoring records; Audit reports; Non-compliance register
Air Quality – Apply dust suppression and plant maintenance.	No visible dust emissions beyond site boundary; Daily site inspections logged; Zero regulatory breaches relating to air quality.	Environmental Manager / Site Supervisor	Daily inspection checklists; Incident register

Objective	Key Performance Indicators (KPIs)	Responsible Role	Evidence / Records
Soil and Water –Install erosion/sediment controls before disturbance; prevent pollution of waters.	100% erosion/sediment controls installed prior to ground disturbance; Zero uncontrolled discharges to stormwater; All spills contained and cleaned within 2 hours.	Environmental Manager / Site Supervisor	Site inspection reports; Spill register; Incident reports
Waste and Spoil – Classify, track, and lawfully dispose of waste; prepare and implement WSMP.	100% waste classified and disposed of lawfully; Waste tracking records maintained and auditable; ≥80% of construction waste diverted from landfill.	Environmental Manager / HSE Manager	EPA waste classification records; Waste dockets; Sustainability reports
Heritage – protect known heritage; apply Unexpected Finds Procedure.	Zero damage to known heritage items; 100% personnel trained in Unexpected Finds Procedure; All unexpected finds managed and cleared before works recommence.	Environmental Manager / Heritage Specialist	Training records; Unexpected Finds register; Clearance reports
Community and Stakeholder Engagement – Implement Community Communications Strategy; notify affected stakeholders; respond to complaints.	100% of required notifications issued ≥7 days in advance; Complaints acknowledged within 24 hours; ≥95% of complaints closed out within 10 business days.	Stakeholder & Community Manager	Community Communications Strategy; Notification letters; Complaints register; Stakeholder engagement reports
Sustainability – Record and report sustainability data; complete TfNSW Air Emissions Workbook; prepare reports.	Monthly sustainability report submitted on time; TfNSW Air Emissions Workbook completed to schedule; At least one resource efficiency initiative implemented.	Sustainability Manager / Environmental Manager	Sustainability reports; TfNSW Air Emissions Workbook; Project sustainability initiatives log

3.3 Hold Points

Table 5: Hold Points

Hold Point	Description	Approval / Verification Required	Responsible Role
HP1 – CEMP Approval	No works are permitted until the CEMP (and relevant subplans) has been reviewed and approved.	Sydney Metro Environment Manager sign-off.	Project Manager / Environmental Manager
HP2 – Erosion and Sediment Controls	Ground disturbance or excavation cannot commence until erosion and sediment controls are installed and verified.	Environmental inspection and approval.	Environmental Manager / Site Supervisor

Hold Point	Description	Approval / Verification Required	Responsible Role
HP3 – Unexpected Finds Procedure	If heritage or contamination is uncovered, all works must stop until assessment is completed and clearance is given.	Qualified heritage or environmental specialist clearance.	Environmental Manager
HP4 – Noise and Vibration Monitoring	Works generating significant noise or vibration cannot commence until monitoring equipment is installed and baseline data is recorded.	Environmental Manager verification.	Environmental Manager
HP5 – Hazardous Materials Management	Any works involving hazardous substances (e.g. asbestos, contaminated spoil, lead paint) must not proceed without clearance and approved controls.	Clearance certificate and Environmental Manager approval.	Environmental Manager / HSE Manager
HP6 – Spill and Pollution Controls	Plant operation and fuel storage cannot commence until spill kits and pollution prevention measures are in place.	Site inspection and verification.	Site Supervisor / Environmental Manager
HP7 – Site Demobilisation	Final site demobilisation cannot occur until environmental reinstatement, waste removal, and inspection have been completed.	Environmental close-out inspection.	Environmental Manager
HP8 - Vegetation	Prior to vegetation clearing/ground disturbance, pre-clearing inspection must be completed and erosion and sediment controls implemented	Environmental Manager or delegate	Environmental Manager
HP9 – Use of local roads by heavy vehicles	Road dilapidation report and approved traffic plans and permits	Appropriate professional nominated by Syscon	Project Manager
HP10 - Out of hours works	DNVIS	Hutchison Weller	Environmental Manager and HW Consultant

4. Project Description

4.1 NST Electrical Kiosk Works

The **Enabling Works North Strathfield** form a critical enabling package within the Sydney Metro West project, designed to establish a permanent and reliable high-voltage (HV) power supply to support future tunnelling and station works at the North Strathfield precinct. The works involve the delivery, installation, and commissioning of an **electrical kiosk** and associated infrastructure, interfacing directly with Ausgrid's distribution network. The scope of work includes **site preparation** through survey, utility identification, and service protection activities to ensure safe excavation and construction. This is followed by **civil works**, including trenching and the installation of low-voltage conduits, footings, and reticulation necessary to house and connect the kiosk. The **electrical kiosk unit**, which has been procured in advance and is stored on site, will be positioned, secured, and fitted out with the required internal cabling, switchgear, and auxiliary systems to meet Ausgrid's standards.

Once installed, the kiosk will be progressively integrated with the broader Sydney Metro West electrical supply framework, with works to include **outage planning, high-voltage cable terminations, and final commissioning**. Modifications to temporary hoarding (installed by previous contractor) and site security arrangements will also be implemented to protect the kiosk during construction and operational transition. The package is scheduled for delivery between **October 2025 and March 2026**, providing essential enabling power for downstream contractors and ensuring continuity of the Sydney Metro West construction program at North Strathfield.

The works are being delivered under a **design and construction contract** procured by Sydney Metro, with strict compliance obligations under the *Environmental Planning and Assessment Act 1979*, the Minister's Conditions of Approval, and the Sydney Metro Construction Environmental Management Framework (CEMF). Environmental risks associated with the works include noise and vibration from excavation, dust generation, traffic and access disruption, spoil and waste management, and potential interaction with underground utilities. These risks will be managed in accordance with the approved CEMP and subplans, with controls implemented to minimise impacts on the surrounding community and environment.

4.2 Work steps and Environmental Aspects

Table 6: Environmental Aspects

Works Category	Description of Activity (with Environmental Aspects)
Survey, Easement Registration & GIS Recording	Surveying and confirming kiosk location, registering easements, and updating GIS records. Environmental aspects: minimal risk, but ensure no disturbance to heritage items during survey access.
Service Locating & Potholing	Identification of underground utilities through GPR scanning and potholing. Environmental aspects: soil disturbance, potential groundwater ingress, and spoil management. Controls include erosion and sediment measures, waste classification, and reinstatement.
Joint Bay Excavation & Security	Excavation of joint bays for electrical connections, with fencing and erosion controls. Environmental aspects: dust generation, noise/vibration from excavation, soil stockpiling, and potential water runoff. Requires sediment controls, dust suppression, and lawful spoil disposal.
Kiosk Installation, Pier Installation & Earthing	Placement of kiosk onto foundation/piers and installation of earthing system. Environmental aspects: crane lifting (noise, exhaust emissions), risk of soil disturbance during pier excavation, and management of construction waste.

Works Category	Description of Activity (with Environmental Aspects)
Low Voltage Cable Pull	Pulling LV cables through conduits into the kiosk. Environmental aspects: minor spoil generation during conduit access, waste from cable offcuts, and energy use. Requires waste segregation and safe handling of cable materials.
HV & LV Kiosk Terminations	Termination of LV cables and preparation of HV connections. Environmental aspects: potential oil or dielectric fluid handling, electrical safety (indirect environmental risk), and generation of small electrical waste (cable ends, packaging).
Disposal & Temporary Reinstatement	Disposal of spoil and reinstatement of disturbed ground or surfaces. Environmental aspects: spoil must be classified and disposed lawfully, noise/dust from reinstatement works, and temporary surface reinstatement to reduce erosion and dust.
Saw Cutting & Concrete Removal	Saw cutting of pavements and removal of concrete to allow internal trenching. Environmental aspects: noise, vibration, dust generation (silica exposure), and waste disposal. Controls: water suppression, PPE, and concrete recycling where possible.
Internal Trenching	Excavation and installation of conduits for internal kiosk cabling. Environmental aspects: soil disturbance, dust, and water runoff. Requires erosion/sediment controls and dust suppression.
LV Cable Pull (Internal)	Pulling LV cables through internal trenches and conduits. Environmental aspects: minor waste from cable offcuts and packaging. Ensure safe handling and correct disposal.
MSB Installation	Installation of main switchboard inside kiosk enclosure. Environmental aspects: packaging waste, potential noise from installation works, and management of electrical installation waste.
Generator Installation	Delivery and installation of a generator for temporary/backup power supply. Environmental aspects: noise during operation, potential fuel storage/handling risks, and air emissions. Spill prevention and bunding required.
Outage Request & Ausgrid Commissioning	Formal outage coordination and final HV energisation. Environmental aspects: minimal direct impacts, but indirect risks include noise from HV testing equipment and waste from protective consumables.
Permanent Restoration of Disturbed Surfaces	Restoration of pavements, kerbs, landscaping, and reinstatement of public areas. Environmental aspects: dust/noise from restoration works, spoil/waste from demolition, and landscape reinstatement. Controls: dust suppression, waste recycling, and final environmental inspection.

4.2 Ancillary Facilities

Ancillary facilities required for the EWNS will be limited to those within the approved project boundary at North Strathfield. These will include a small site compound and laydown area adjacent to the kiosk location for the duration of the works. The facility will be used to support site establishment, storage of materials, and parking for construction plant.

No ancillary facilities are proposed outside the approved project boundary. Should additional facilities be required, they will only be established following preparation of a Site Establishment Management Plan (SEMP) in accordance with Condition of Approval A17, and subsequent approval by Sydney Metro and the Environmental Representative. Any ancillary facilities established will be supported by an Environmental Control Map (ECM) identifying required controls, including erosion and sediment measures, spill response equipment, and waste segregation facilities.

Figure 1 – General Indicative Layout

Figure: Compound worksite



Figure: All work sites including site compound and two joint bay work areas on Queen and Waratah Sts



5. Review and Approval

5.1 Internal Consultation

This CEMP has been developed in consultation with key project personnel to ensure that the environmental management measures are practical, effective, and aligned with the operational requirements of the EWNS. Internal consultation included input from the Project Manager, Environmental Manager, Site Supervisors, Health and Safety personnel, and engineering leads.

The draft plan was circulated for internal review, with comments and feedback incorporated prior to finalisation. Ongoing consultation will continue throughout delivery of the works, with project personnel engaged through inductions, toolbox talks, and regular coordination meetings to ensure environmental requirements are clearly understood and effectively implemented.

5.2 External Consultation

In accordance with the Conditions of Approval and the Sydney Metro Construction Environmental Management Framework (CEMF), this CEMP has been prepared in consultation with relevant external stakeholders. Key consultation activities included engagement with **Sydney Metro's Environment and Planning team**, including Environmental Representative (ER) and Acoustic Advisor (AA), to ensure consistency with project-wide requirements, and liaison with Ausgrid regarding interface arrangements for the electrical kiosk and associated high-voltage works.

Where required, consultation has also been undertaken with the relevant local council and government agencies to confirm compliance with statutory obligations and to address specific environmental management issues, such as traffic, noise, and utility impacts. The outcomes of this consultation have been incorporated into the CEMP to ensure the plan reflects the expectations and requirements of regulators and stakeholders.

5.3 Approval

This CEMP will not take effect until it has been reviewed and approved in accordance with the requirements of the Conditions of Approval and the Sydney Metro Construction Environmental Management Framework (CEMF).

Internal Approval: The CEMP has been reviewed and endorsed by the Syscon Project Manager and Environmental Manager to confirm alignment with internal management systems and project delivery requirements.

External Approval: Following internal endorsement, the CEMP will be submitted to Sydney Metro for review and then provided to the Environmental Representative (ER) for approval on behalf of the Planning Secretary.

DPHI Approval: Approval by the Department of Planning, Housing and Infrastructure (DPHI) is not required, so long as the ER endorses the plan no later than one month prior to construction in accordance with the Conditions of Approval (C3).



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Construction Environmental Management Plan

Project: EWNS

Job No: CO2262

Once approved, the CEMP becomes a controlled document. Copies will be issued to all relevant personnel and contractors, and the approved version will be maintained within the project's document control system.

Any subsequent revisions to the CEMP will also be subject to the same review and approval process, with changes clearly identified and communicated to all personnel.

6. Environmental Management Plan

This section of the CEMP outlines the processes by which environmental requirements for the EWNS will be managed in accordance with the Conditions of Approval, the Sydney Metro Construction Environmental Management Framework (CEMF), and Syscon's management systems.

The structure of this section reflects the Plan–Do–Check–Act cycle applied under ISO 14001 and provides a clear framework for ensuring that environmental risks are identified, controls are implemented, performance is monitored, and opportunities for improvement are acted upon.

The subsections are organised as follows:

- Planning – translating statutory requirements, risk assessments, and project approvals into site-based environmental controls.
- Implementation – embedding these controls into day-to-day operations through roles, training, subplans, and environmental control maps.
- Monitoring, Inspection and Auditing – verifying that controls are in place and effective through regular inspections, monitoring, and audit processes.
- Reporting – documenting and communicating environmental performance internally and externally to Sydney Metro and regulators.
- Review and Continuous Improvement – ensuring the CEMP remains current and effective, with lessons learned incorporated into ongoing project delivery.

6.1 Planning

Environmental planning for the EWNS has been undertaken to ensure that construction activities are managed in accordance with the project's statutory approvals, the Sydney Metro Construction Environmental Management Framework (CEMF), and Syscon's internal management systems.

The planning process has included the following key elements:

Integration with Approvals

The requirements of the Environmental Impact Statement (EIS), Revised Environmental Mitigation Measures (REMMs), and the Conditions of Approval (CoA) have been reviewed and embedded into this CEMP and its supporting subplans.

Environmental Risk Assessment

A risk-based assessment of environmental aspects was undertaken during project planning. Key risks identified for the kiosk works include noise and vibration, dust and air quality, spoil and waste management, soil and water impacts, heritage and unexpected finds, and community/stakeholder impacts. Controls for each risk are detailed in the relevant subplans.

Environmental Control Maps (ECMs)

ECMs will be prepared and maintained for the site to illustrate the location of controls including erosion and sediment devices, access points, spill kits, noise barriers (if required), and storage areas. These maps will be updated as the works progress.

Alignment with the Construction Program

Environmental requirements have been integrated into the construction program to ensure that approvals, hold points, monitoring, and inspections occur before key

construction activities such as excavation, kiosk installation, cable pulling, and commissioning.

Consultation with Stakeholders

The planning stage has included consultation with Sydney Metro, Ausgrid, and relevant government agencies to ensure project-specific requirements are reflected in this CEMP. Where applicable, comments and feedback have been incorporated into the plan prior to approval.

6.2 Implementation

The requirements of this CEMP will be implemented across all activities associated with the EWNS to ensure compliance with the Conditions of Approval, the CEMP, and Syscon's management systems. Implementation will be achieved through the following measures:

- Roles and Responsibilities: Project personnel with specific environmental responsibilities have been identified in this CEMP. All personnel are accountable for complying with environmental requirements relevant to their work - see Table 7 Roles and Responsibilities.
- Induction and Training: All site workers and subcontractors will receive a project-specific induction that includes environmental requirements, key risks, and control measures. Additional toolbox talks will be delivered on specific environmental aspects (e.g. erosion and sediment control, spill response, unexpected finds).
- Environmental Control Maps (ECMs): ECMs will be prepared for the kiosk site and compound areas. These maps will detail the location of erosion and sediment controls, waste storage points, spill kits, access routes, exclusion zones, and sensitive receivers.
- Procedures and Subplans: All environmental subplans will be implemented in parallel with this CEMP. These provide the detailed procedures for managing specific environmental aspects.
- Hold Points: Environmental hold points have been identified to ensure critical controls are in place prior to commencing high-risk activities (e.g. excavation cannot commence until erosion and sediment controls are in place) – see Table 24 Hold Point Register.
- Communication and Consultation: Ongoing consultation will occur with Sydney Metro, Ausgrid, and relevant stakeholders to ensure works remain consistent with project requirements. Community notifications will be issued in accordance with the Community Communications Strategy.
- Monitoring and Reporting: Environmental performance will be monitored through daily site inspections, formal weekly inspections, and regular environmental reporting. Any non-conformances will be recorded, investigated, and closed out in accordance with Syscon's corrective action process.

Implementation of this CEMP ensures that environmental controls are not only documented but actively embedded into day-to-day site operations.

6.3 Monitoring, Inspection and Auditing

Monitoring, inspections, and audits will be undertaken to verify that the environmental requirements of this CEMP, the subplans, and the Conditions of Approval are being effectively implemented during the EWNS. These activities form the “check” stage of the environmental management cycle and ensure that environmental performance is transparent, consistent, and auditable.

Monitoring

- Environmental monitoring will be undertaken where required by the Conditions of Approval, the CEMF, and the project subplans.
- Specific monitoring requirements include noise and vibration monitoring during excavation and cable installation, dust and air quality checks during concrete cutting and spoil handling, and visual monitoring of erosion and sediment controls following rainfall events.
- **Monitoring results will be recorded and retained as part of the project's environmental records.**

Inspections

- Daily site inspections will be conducted by site supervisors to confirm that environmental controls are in place and functioning effectively.
- Weekly environmental inspections will be undertaken by the Environmental Manager or delegate, with findings documented and corrective actions raised where required.
- Pre-hold point inspections will be completed prior to commencing high-risk activities, such as excavation or HV connection works, to ensure that required environmental controls are installed.

Auditing

- Internal environmental audits will be undertaken by Syscon in accordance with the **company's Integrated Business Management System.**
- External audits may be undertaken by Sydney Metro, the Environmental Representative (ER), or the Department of Planning, Housing and Infrastructure (DPHI) as required under the Conditions of Approval.
- **Audit findings will be recorded, reported, and addressed through Syscon's corrective action process, with close-out verified by the Environmental Manager and communicated to Sydney Metro where required.**

This structured program of monitoring, inspections, and audits provides assurance that environmental controls are not only established but remain effective and compliant throughout the delivery of the kiosk works.

6.4 Reporting

Reporting is an essential component of environmental management, ensuring that performance outcomes are communicated to project personnel, Sydney Metro, and relevant regulators. Reporting obligations for the EWNS include the following:

Internal Reporting

- Daily pre-start briefings will include discussion of environmental risks and controls relevant to planned activities.
- Site supervisors will record daily inspection findings in site diaries or inspection checklists, which are reviewed by the Environmental Manager.
- Weekly environmental inspection reports will be prepared by the Environmental Manager and provided to the Project Manager for review and action.

Sydney Metro Reporting

- Monthly environmental performance reports will be submitted to Sydney Metro, covering key aspects such as monitoring results, incidents, community complaints, and compliance with Conditions of Approval.

- The Environmental Manager will provide regular updates at Sydney Metro coordination meetings and participate in environmental performance reviews as requested.
- Sustainability data, including completion of the Transport for NSW Air Emissions Workbook and monthly sustainability reporting, will be provided in accordance with Sydney Metro requirements.

Regulatory Reporting

- Environmental incidents that trigger notification requirements under the *Protection of the Environment Operations Act 1997* or the Conditions of Approval will be reported immediately to the Environmental Representative (ER), Sydney Metro, and the Department of Planning, Housing and Infrastructure (DPHI).
- Where monitoring indicates an exceedance of environmental criteria (e.g. noise or dust), this will be reported promptly, with investigation findings and corrective actions documented.
- Records of waste tracking, water discharges, and any other licence conditions will be maintained and provided to regulators upon request.

Record keeping

- All reports, checklists, and monitoring results will be retained in Syscon's document management system as controlled records.
- Reports will be made available for review by Sydney Metro, the ER, or regulators as required.

6.5 Review and Continuous Improvement

This CEMP will be subject to ongoing review to ensure it remains current, effective, and aligned with the project's environmental risks, Conditions of Approval, and Sydney Metro requirements. Continuous improvement is achieved by regularly assessing environmental performance, incorporating lessons learned, and updating management measures where required.

Review Requirements

- The CEMP will be formally reviewed at least annually, or earlier if there are significant changes to the scope of works, project approvals, or identified environmental risks.
- Reviews will also be triggered by incidents, non-conformances, audit findings, or changes in legislation or Sydney Metro requirements.
- Subplans and Environmental Control Maps (ECMs) will be reviewed in parallel to ensure consistency with the CEMP.

Continuous Improvement

- Corrective and preventative actions raised through inspections, audits, or incidents will be tracked to close-out and used to inform future improvements.
- Lessons learned during the kiosk works will be documented and communicated to project personnel through toolbox talks, pre-starts, and management meetings.
- Opportunities for improvement identified during internal or external reviews will be incorporated into revised versions of the CEMP and subplans.

Approval of Revisions

- Any revisions to the CEMP will be clearly identified and resubmitted for review and approval by Sydney Metro and the Environmental Representative (ER) before implementation.
- Updated versions will be reissued to project personnel, with changes highlighted through induction refreshers, toolbox talks, or targeted communications.

Through this process, the CEMP remains a live document, continually improved in response to project experience, monitoring results, and stakeholder expectations.

6.6 Management Review

The management review process ensures the ongoing suitability, adequacy and effectiveness of this CEMP and associated environmental management plans. Reviews are undertaken to evaluate environmental performance, identify improvement opportunities, and confirm alignment with Sydney Metro's CEMP and project obligations.

Management Reviews will be conducted regularly to:

- Ensure continual improvement of environmental management performance.
- Assess the adequacy of the CEMP and related procedures in addressing environmental risks and obligations.
- Verify compliance with relevant legislation, Conditions of Approval, Sydney Metro requirements, and company policies.
- Incorporate lessons learned from incidents, audits, and stakeholder feedback.

Syscon holds formal management reviews of its IBMS at least annually. At least one additional review will be conducted with specific focus on the EWNS management plans during the life of the project, and further meetings may be scheduled following significant changes to project scope, design, or environmental risk.

Project-based management reviews will be chaired by the Project Manager and attended by the Environmental Manager and other relevant personnel.

The review will consider:

- Outcomes of environmental inspections, monitoring and internal/external audits
- Incident and non-conformance trends and corrective actions
- Progress against environmental objectives, targets and KPIs
- Compliance with legal and other requirements
- Stakeholder feedback, complaints and community issues
- Changes in legislation, standards, or Sydney Metro requirements, and
- Opportunities for improvement to the CEMP and sub-plans.

Actions arising from the management review will be documented in minutes and assigned to responsible personnel with agreed timeframes. Where necessary, this CEMP and associated sub-plans will be updated to reflect improvement actions or revised requirements. The Environmental Manager will communicate outcomes and updates to project personnel through toolbox talks, management meetings and training sessions as required.

Records of all management reviews, including agendas, attendance, minutes, and action outcomes, will be maintained by the Environmental Manager. Evidence of completed

actions and updates will be included in environmental performance reports to Sydney Metro.

6.7 Induction and Training

All personnel working on the project must be appropriately trained and made aware of their environmental responsibilities. Environmental induction and training ensure that everyone understands the site-specific environmental risks, control measures, and reporting requirements relevant to their role.

A Training Needs Analysis (TNA) has been undertaken to ensure that all personnel engaged on the project possess the necessary environmental knowledge and competencies to perform their roles in compliance with the Construction Environmental Management Plan (CEMP) and Sydney Metro's Construction Environmental Management Framework (CEMF). The analysis confirms that all workers are required to receive environmental training prior to commencing work and that personnel with defined environmental responsibilities—such as the Project Manager, Environmental Manager, Site Supervisors, and HSEQ Manager—must hold qualifications or experience appropriate to their duties. The TNA identifies the specific training courses and frequency required to maintain competency, including project inductions, toolbox talks, targeted environmental training, and annual refreshers. A documented training schedule is maintained by the Environmental Manager to plan attendance, record completion, notify staff of upcoming requirements, and track any overdue training. This structured approach ensures ongoing environmental awareness, compliance with CEMF Clause 3.10(b), and continual improvement in environmental performance across the project workforce.

6.7.1 Environmental Induction

Before commencing work on site, all workers, subcontractors, and visitors will attend a Project Induction.

The induction will include, at a minimum:

- Overview of the EWNS project and environmental commitments
- Key environmental risks and control measures (e.g. dust, noise, vibration, erosion and sediment, waste, heritage, and flora/fauna protection)
- Site Environmental Control Maps (ECMs) and no-go zones
- Spill prevention and response procedures
- Unexpected finds procedures (heritage items, contamination, asbestos)
- Waste segregation and resource recovery requirements
- Incident and emergency response and notification requirements
- Roles and responsibilities for environmental protection and reporting.

Induction attendance records, including participant details and completion dates, will be maintained by the HSEQ Manager and made available for audit where required.

6.7.2 Toolbox Talks and Pre-Start Briefings

Environmental topics will be incorporated into toolbox talks and pre-start briefings to reinforce key controls, communicate changes to site conditions, and highlight lessons learned from recent incidents or inspections. Toolbox topics may include erosion and sediment management, spill response, waste handling, or noise minimisation practices.

6.7.3 Targeted and Refresher Training

Targeted environmental training will be provided for personnel involved in activities with higher environmental risk (e.g. concrete cutting, excavation near trees, or handling hazardous materials).

Refresher training will be delivered when:

- Environmental procedures or controls change
- An environmental non-conformance or incident occurs
- Directed by Sydney Metro, the ER, or the Environmental Manager.

6.7.4 Environmental Awareness for Visitors

Visitors who are not performing construction activities will receive a Visitor Induction outlining site environmental sensitivities, restricted areas, and incident reporting requirements.

6.7.5 Records and Verification

Records of all environmental training and briefings will be maintained. The Environmental Manager is responsible for verifying that all workers have completed the required induction and maintaining evidence of competency for audit purposes.

7. Roles and Responsibilities

Effective implementation of this CEMP requires clear allocation of roles and responsibilities. All personnel working on the EWNS are responsible for complying with environmental requirements relevant to their tasks. Key responsibilities are outlined below.

Table 7: Roles and Responsibilities

Role	Responsibilities
Project Manager	<ul style="list-style-type: none"> - Overall accountability for delivery of the works in compliance with this CEMP and the Conditions of Approval. - Ensures adequate resources are provided for environmental management. - Reviews environmental performance reports and ensures corrective actions are implemented. - Liaises with Sydney Metro on environmental performance and compliance matters.
Environmental Manager	<ul style="list-style-type: none"> - Day-to-day coordination and oversight of environmental management on site. - Maintains, updates and implements the CEMP, subplans, and Environmental Control Maps (ECMs). - Conducts weekly environmental inspections and monitors compliance. - Coordinates incident response, reporting, and close-out. - Provides advice to the Project Manager and Site Supervisors on environmental risks and controls. - Primary point of contact with Sydney Metro's Environment Team, the Environmental Representative (ER), and regulators.
Site Supervisors / Engineers	<ul style="list-style-type: none"> - Ensure environmental controls are implemented in the field in accordance with the CEMP and ECMs. - Conduct daily site inspections and pre-start briefings that include environmental risks. - Stop works if environmental controls are not in place or if non-compliance is identified. - Report incidents and non-conformances to the Environmental Manager immediately.
Health, Safety, Environment & Quality (HSEQ) Manager	<ul style="list-style-type: none"> - Provides overarching governance to ensure alignment with Syscon's Integrated Business Management System (IBMS). - Supports incident investigation, root cause analysis, and lessons learned. - Leads or supports internal environmental audits.
All Personnel and Subcontractors	<ul style="list-style-type: none"> - Comply with the requirements of this CEMP, subplans, and ECMs. - Participate in inductions, toolbox talks, and environmental training. - Immediately report environmental hazards, incidents, or non-compliances to supervisors. - Use environmental protection equipment (e.g. spill kits, dust suppression) as instructed.
Sydney Metro	<ul style="list-style-type: none"> - Provides oversight and assurance to ensure contractor compliance with project approvals and the CEMP. - Reviews environmental reports, inspection outcomes, and incident notifications. - Facilitates coordination with relevant government agencies where required.
Environmental Representative (ER)	<ul style="list-style-type: none"> - Independent role appointed under the CoA, accountable to the Planning Secretary. - Reviews and approves the CEMP and subplans prior to implementation. - Monitors compliance through site inspections and review of records. - Advises the Planning Secretary and Sydney Metro of compliance status.
Traffic Consultants – Retro Traffic	<ul style="list-style-type: none"> - Provides specialist input into traffic and transport management in accordance with the project's Traffic Management Plans and relevant approval conditions. - Liaises with the Project Manager, Site Supervisor and Environmental Manager to ensure haulage routes, access points, and traffic controls are implemented safely and with minimal community impact. - Reviews site traffic arrangements and updates management measures as required in response to changing site conditions or community feedback.



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Construction Environmental Management Plan

Project: EWNS

Job No: CO2262

Role	Responsibilities
	- Supports reporting and compliance verification for traffic-related environmental requirements.
Acoustic Consultants – Hutchison Weller	<ul style="list-style-type: none">- Provide technical advice to the Environmental Manager or Sydney Metro as required during the project.- Support the review and interpretation of noise and vibration monitoring data where specialist input is needed.- May assist in the refinement of mitigation measures or modelling if site conditions change or exceedances are identified.

8. Environmental Aspects and Impacts

An environmental risk assessment has been undertaken for the EWNS to identify the activities that may cause environmental impacts and to establish appropriate control measures. The assessment considered the Environmental Impact Statement (EIS), Revised Environmental Mitigation Measures (REMMs), the Conditions of Approval (CoA), and the Sydney Metro CEMF.

The significant environmental aspects for this project are outlined in the table below.

Table 8: Environmental aspects and impacts

Aspect	Potential Impact
Noise and Vibration	Generated by excavation, saw cutting, cable pulling, kiosk installation, and crane operations. May affect local residents, businesses, and other sensitive receivers.
Air Quality / Dust	Produced from trenching, spoil handling, concrete cutting, and vehicle movements. Can cause nuisance and health impacts in the community.
Soil and Water	Risks from excavation, stockpiling, concrete washout, and potential spills, including erosion, sediment runoff, or water contamination.
Waste and Spoil Management	Includes classification, storage, and disposal of excavated spoil, concrete waste, packaging, and cable offcuts. Risk of unlawful disposal if not properly managed.
Heritage and Unexpected Finds	Potential to uncover archaeological items, contamination, or relics during excavation activities.
Community and Stakeholder Impacts	Includes traffic disruption, restricted property access, and complaints related to noise, dust, or vibration.
Sustainability and Resource Efficiency	Concerns over energy use, emissions from plant and generators, and opportunities for recycling and resource recovery.

Each of these aspects has been assessed for risk and linked to specific objectives, KPIs, and control measures as detailed in Section 9 and the associated subplans. The Aspects and Impacts Register, included in **Appendix B**, provides the detailed risk assessment, likelihood and consequence ratings, and mitigation strategies.

9. Environmental Control Measures/Subplans

9.1 Noise and Vibration

Construction activities for the North Strathfield Electrical Kiosk Works, including excavation, saw cutting, joint bay works, crane lifts, cable pulling, and kiosk installation, have the potential to generate noise and vibration impacts on surrounding sensitive receivers, including nearby residents, businesses, and road users.

Objectives

- Minimise unreasonable noise and vibration impacts on surrounding receivers, including residents, businesses, schools, and community facilities.
- Avoid structural damage to buildings or heritage items as a result of vibration.
- Undertake active community consultation and provide advance notification of noisy works.
- Comply with the Conditions of Approval (CoA D34–D51), REMMs (NV01–NV18) and the Sydney Metro CEMF.

Key Risks

- Elevated noise levels during saw cutting, concrete removal, and crane operations.
- Vibration impacts from trenching and compaction near sensitive structures.
- Potential community disturbance leading to complaints.

Control Measures

Noise and vibration will be managed in accordance with the Construction Noise and Vibration Management Plan (CNVMP) and the Detailed Noise and Vibration Impact Statement (DNVIS) prepared for the works. Together, these documents address the CoA requirements and establish the framework for managing construction noise and vibration impacts.

Key requirements summarised from the CoA include:

- Land Use Survey (CoA D34): A land use survey must be undertaken to confirm sensitive receivers (including critical working areas such as laboratories, medical facilities, and places of worship) prior to commencing noise or vibration generating works.
- Standard Construction Hours (CoA D35): Works are permitted 7:00 am–6:00 pm Monday to Friday, and 8:00 am–6:00 pm Saturday. No works are permitted on Sundays or public holidays.
- Highly Noise-Intensive Works (CoA D36): Restricted to 8:00 am–6:00 pm Monday to Friday, and 8:00 am–1:00 pm Saturday, with limits on continuous duration.
- Out-of-Hours Works (CoA D37–D38): May only proceed under specific circumstances, including emergency works, low noise impact works, Out-of-Hours Work Protocol approval, or where negotiated agreements with receivers are in place. Respite periods must be provided where required.
- Noise Management Levels (CoA D39–D41): Works must be managed to achieve the Interim Construction Noise Guideline (ICNG) noise management levels, vibration criteria (DEC 2006), and structural/heritage vibration limits (DIN 4150, BS 7385).
- Mitigation Measures (CoA D42–D43, REMMs NV01–NV09): Feasible and reasonable measures must be applied, including use of low-noise plant, temporary noise barriers, alternative methodologies, and portable acoustic screens. Additional mitigation measures must be identified in the DNVIS for works with predicted exceedances.

- **Heritage Protection (CoA D46–D49, REMM NV16–NV17):** Vibration monitoring and testing must be conducted near heritage items, with advice sought from heritage specialists to ensure sensitive fabric is protected. More conservative cosmetic damage criteria apply to structurally unsound heritage items.
- **Respite and Coordination (CoA D50–D51, REMM NV03, NV18):** Works must be coordinated with other Sydney Metro and nearby projects to ensure respite periods are achieved and cumulative impacts are minimised.
- **Community Engagement (REMM NV01, REMM NV14):** Consultation must occur with affected communities and sensitive institutions to understand preferences for mitigation and respite. Notifications must be provided in accordance with the Community Communication Strategy.

Monitoring and Reporting

- Attended and unattended noise monitoring at sensitive receivers, where required.
- Vibration monitoring during activities with potential to exceed screening criteria.
- Publication of monitoring results in line with CoA requirements.
- Notification of affected receivers where exceedances are predicted or monitoring indicates a risk of exceedance.

Community complaints relating to noise or vibration will be managed in accordance with Section 9.6 Community and Stakeholder Engagement, with all complaints recorded in the Complaints Register.

Table 9: Noise and Vibration – Compliance Summary Table

Ref	Type	Requirement	CEMP Control / Mitigation	Reference Document
D34	COA	Undertake land use survey to confirm sensitive receivers before works commence in each area.	Land use survey to be completed and results incorporated into CNVMP.	CNVMP
D35	COA	Standard construction hours: 7am–6pm Mon–Fri; 8am–6pm Sat; no works on Sundays/public holidays.	Works scheduled within approved hours unless approved under OOHV Protocol.	CNVMP
D36	COA	Highly noise-intensive works restricted to 8am–6pm Mon–Fri, 8am–1pm Sat, max 3 hrs continuous with 1 hr break.	Highly noise-intensive works programmed in line with requirements.	CNVMP
D37	COA	Variations to work hours allowed only for: emergencies, low-noise impact works, with EPL approval, or under OOHV Protocol.	Out-of-hours works assessed and approved in accordance with CNVMP OOHV Protocol; community notification undertaken.	CNVMP OOHV Protocol
D39	COA	Achieve ICNG noise management levels and DEC vibration criteria; comply with AS 2187.2, BS 7385, DIN 4150-3.	Monitoring against applicable criteria; mitigation applied where exceedances predicted.	CNVMP
D40	COA	Apply mitigation when residential ground-borne noise exceeds 40 dB(A) evening, 35 dB(A) night.	Feasible/reasonable mitigation measures applied; exceedances managed via DNVIS.	CNVMP / DNVIS
D41	COA	No noisy works scheduled during sensitive periods for schools, hospitals, places of worship, etc.	Construction schedule coordinated with affected institutions; alternative arrangements agreed where required.	CNVMP Section

Ref	Type	Requirement	CEMP Control / Mitigation	Reference Document
D42	COA	Implement industry best practice methods (low-noise equipment, barriers, alternative techniques).	Mitigation hierarchy adopted on site; temporary and portable barriers used.	CNVMP Section
D43–D44	COA	Prepare Detailed Noise and Vibration Impact Statements (DNVIS) for works with predicted exceedances.	DNVIS prepared, endorsed by AA and ER, and implemented prior to works.	DNVIS
D45	COA	Notify owners/occupiers at risk of vibration impacts before works commence.	Notifications issued prior to vibration-generating works; monthly schedule provided where repeated exceedances occur.	CNVMP / DNVIS
D46–D49	COA	Vibration testing and monitoring at heritage items; more conservative limits applied if structurally unsound.	Monitoring locations and criteria developed with heritage specialist; construction methods adjusted if exceedances likely.	CNVMP Section /Heritage Management Plan
D50–D51	COA	Coordinate works to ensure respite periods; consult community on respite for OOHW.	Respite periods identified and implemented in consultation with community; coordination with other projects.	CNVMP OOHW Protocol
NV01	REMM	Engage with communities and sensitive receivers to understand mitigation preferences.	Consultation incorporated into community engagement strategy; preferences reflected in mitigation approach.	CNVMP / Community Communication Strategy
NV02	REMM	Investigate and implement alternative methodologies to minimise noise/vibration.	Alternative construction methods considered during planning and execution.	CNVMP
NV03	REMM	Provide respite in accordance with Sydney Metro CNVS.	Respite periods documented and communicated to affected receivers.	CNVMP OOHW Protocol
NV04	REMM	Schedule noise-intensive equipment use for standard hours where feasible.	Programmed works to minimise out-of-hours impacts.	CNVMP
NV05–NV06	REMM	Use silencers on heavy vehicles; design hoarding to minimise sleep disturbance.	Heavy vehicle management plan implemented; hoardings considered in design. Hoardings were installed by previous contractor	CNVMP
NV09	REMM	Implement measures to minimise ground-borne noise where predicted exceedances occur.	Alternative methods considered to reduce ground-borne noise impacts.	CNVMP / DNVIS
NV14	REMM	Further assessment of construction traffic noise; implement mitigation where required.	Construction traffic noise managed via haulage routes, scheduling, vehicle controls.	CNVMP / Construction Traffic Management Plan
NV16–NV17	REMM	Condition surveys and monitoring for structures at risk of vibration; include heritage fabric.	Surveys completed prior to excavation; monitoring in place for at-risk structures.	CNVMP / Heritage Management Plan
NV18	REMM	Review cumulative impacts and coordinate with other projects.	Coordination with other Sydney Metro and adjacent projects to minimise overlap.	CNVMP

Reference:

- Construction Noise and Vibration Management Plan (CNVMP)

9.2 Air Quality and Dust

Construction activities such as trenching, joint bay excavation, concrete cutting, spoil handling, vehicle movements, and site reinstatement have the potential to generate dust and impact local air quality. Poorly managed works may also result in nuisance impacts for the local community and health risks for workers.

Objectives

- All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.
- To minimise dust and air emissions from construction activities.
- To ensure compliance with the Conditions of Approval, the Sydney Metro CEMF, and relevant air quality criteria.
- To prevent visible dust emissions leaving the site boundary.

Key Risks

- Dust generation from saw cutting, trenching, spoil stockpiles, and unsealed surfaces.
- Exhaust emissions from construction plant, equipment, and generators.
- Community complaints resulting from visible dust or odour.

Control Measures

- Regularly wet-down exposed and disturbed areas including stockpiles, especially during dry weather
- Adjust the intensity of activities based on measured and observed dust levels and weather forecasts
- Minimise the amount of materials stockpiled and position stockpiles away from surrounding receivers
- Regularly inspect dust emissions and apply additional controls as required
- The extent of opened and disturbed contaminated soil at any given time would be minimised
- Temporary coverings or odour suppressing agents would be applied to excavated areas where appropriate
- Regular monitoring would be conducted during excavation to verify that no offensive odours are detected beyond the site boundary.
- Use water suppression during saw cutting, concrete removal, and excavation.
- Cover or stabilise all stockpiles and loads during transport.
- Restrict vehicle speeds on unsealed areas and maintain haulage routes in damp or sealed condition.
- Minimise double handling of spoil and ensure timely removal from site.
- Maintain all plant and equipment in good working condition to reduce exhaust emissions.
- Store and handle fuels and chemicals in accordance with spill prevention requirements to avoid odour or vapour release.
- Install dust screens or hoarding where works are adjacent to sensitive receivers.

Monitoring and Reporting

- Daily visual inspections will be carried out by site supervisors to identify dust risks and confirm controls are effective.

- Monitoring records will be maintained, and any dust complaints will be investigated and reported in accordance with the Community Communications Strategy.
- Any non-compliance or exceedance will be reported to Sydney Metro and the ER in line with incident response requirements.
- Air emissions data will be recorded and reported through the TfNSW Air Emissions Workbook as part of monthly sustainability reporting.

Table 10: Air Quality and Dust – Compliance Summary Table

Ref	Requirement	How this CEMP addresses compliance
CoA D1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	Section 9.2 of this CEMP sets out objectives, risks, and controls to minimise dust and air emissions. Controls include water suppression, covering loads, stockpile management, dust screens, vehicle speed limits, and equipment maintenance. Daily inspections and monitoring are required to verify effectiveness.
DPHI correspondence SSI-10038-PA-732 (15 April 2025)	No separate Air Quality Management Plan (AQMP) is required; requirements must be addressed in the CEMP.	Section 9.2 incorporates all air quality and dust management measures into this CEMP, with compliance records and monitoring processes documented.
Sydney Metro CEMF (s.13 Air Quality)	Contractors must implement air quality management objectives and controls to minimise dust, gaseous emissions, and nuisance impacts.	Section 9.2 includes all key measures from the CEMF, including dust suppression, equipment emission controls, stockpile management, and odour control during excavation of contaminated material.

9.3 Soil and Water (erosion, sediment, stormwater)

Construction activities involving trenching, joint bay excavation, spoil handling, concrete cutting, and kiosk installation have the potential to impact soil stability and water quality if not properly managed. Risks include erosion, sedimentation, uncontrolled runoff, and spills of fuels, oils, or concrete washout water.

Erosion and Sediment Control Plan

An Erosion and Sediment Control Plan (ESCP) will be prepared and implemented for the project prior to the commencement of any ground-disturbing works. The ESCP will form a key supporting document to this CEMP, outlining site-specific control measures to prevent erosion and the migration of sediment to drainage systems and waterways. The ESCP will be consistent with the principles and requirements of **Managing Urban Stormwater: Soils and Construction (Landcom, 2004) – The Blue Book** and will detail temporary and permanent controls such as diversion drains, sediment fences, check dams, inlet protection, and progressive stabilisation methods. The ESCP will include site layout plans showing the location of all controls, stockpiles, and water treatment areas, as well as inspection and maintenance procedures. The plan will be reviewed and updated as site conditions change to ensure ongoing compliance with the Sydney Metro Construction Environmental Management Framework (CEMF) and Condition of Approval D116.

Objectives

- To prevent soil erosion and protect surface water and groundwater quality.

- To comply with the Sydney Metro CEMP, Conditions of Approval (including CoA D116), and relevant EPA and Council requirements.
- To implement effective erosion, sediment, and stormwater controls prior to commencement of works and maintain them throughout construction.

Key Risks

- Sediment-laden runoff entering stormwater drains or waterways.
- Soil erosion and instability around excavations and stockpiles.
- Contamination of soil or water from spills, leaks, or improper waste storage.
- Concrete washout water contaminating soil or stormwater.

Control Measures

- Erosion and sediment controls will be implemented and maintained before any works commence, consistent with **Managing Urban Stormwater: Soils and Construction, Vol. 1 (Landcom, 2004) — “The Blue Book”**.
- Controls may include silt fencing, sandbags, geofabric, inlet protection, check dams, and temporary diversion drains, depending on site conditions.
- Temporary sediment basins, where required, will be designed and managed in accordance with the Blue Book.
- Stockpiles will be located away from drains and watercourses, covered where practicable, and surrounded with sediment controls.
- Concrete washout will only occur in designated, bunded locations with impermeable liners to prevent contamination.
- Fuels and chemicals will be stored in bunded, weather-protected areas with spill kits readily available.
- Plant and equipment will be maintained in good working order to minimise the risk of leaks.
- Disturbed areas will be stabilised progressively and reinstated as soon as practicable following completion of works.
- A **Hold Point** will apply prior to water discharge: no water will be released until it has been tested and written approval obtained from the Contractor's Environmental Manager, in line with CEMP 12.2 requirements.

Monitoring and Reporting

- Daily site inspections will confirm that erosion and sediment controls are in place and effective.
- Additional inspections will be undertaken within 24 hours of any rainfall event exceeding 20 mm in 24 hours.
- All inspections and corrective actions will be recorded in the site environmental log.
- Any uncontrolled discharge, spill, or pollution incident will be reported immediately to Sydney Metro, the ER, and relevant regulators in accordance with the incident and emergency management procedure.

Table 11: Soil and Water – Compliance Summary Table

Reference	Requirement	How this CEMP Addresses Requirement
CoA D116	Before undertaking any works and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Landcom's <i>Managing Urban Stormwater</i> (the “Blue Book”).	Erosion and sediment controls (silt fences, sandbags, geofabric, inlet protection, diversion drains) will be implemented before works commence and maintained throughout construction. Controls will follow the Blue Book principles (see Section 9.3 Control Measures). Daily and post-rain inspections ensure effectiveness.

SSWQ3	Erosion and sediment measures would be implemented at all construction sites in accordance with the principles and requirements of the Blue Book (Volume 1, 2004 and Volume 2D, 2008). Water collected from construction sites must be treated and discharged to avoid contamination. Temporary sediment basins to be designed per Blue Book.	Controls and sediment basins (if required) will be installed and maintained consistent with the Blue Book. Water will be tested and treated prior to discharge, with a Hold Point requiring written approval from the Environmental Manager before release (see Section 9.3 Control Measures). Records of inspections, water quality testing, and releases will be kept (see Section 9.3 Monitoring and Reporting).
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9.4 Waste and Spoil

Construction activities such as joint bay excavation, trenching, concrete removal, kiosk installation, and cabling will generate spoil, construction waste, and packaging materials. If not properly managed, these materials may cause pollution, create amenity impacts, or result in non-compliance with waste legislation.

Objectives

- Minimise the generation of waste and maximise opportunities for reuse and recycling.
- Ensure all waste and spoil are classified, tracked, stored, and disposed of lawfully.
- Comply with the Sydney Metro CEMF, the EPA Waste Classification Guidelines (2014), and relevant regulatory requirements.

Key Risks

- Excavated spoil incorrectly classified or stockpiled, leading to unlawful disposal.
- Excess packaging, cable offcuts, or construction waste sent to landfill unnecessarily.
- Contamination risks if hazardous materials are encountered (e.g. asbestos, lead paint, contaminated soil).
- Community or regulatory complaints from poorly managed waste storage or handling.

Control Measures

- Classify all spoil and waste in accordance with the NSW EPA *Waste Classification Guidelines* (2014).
- Store waste in designated, clearly labelled areas with segregation for recyclables, general waste, and hazardous waste.
- Cover or contain spoil prior to off-site transport to prevent dust and spillage.
- Use only licensed waste transporters and approved EPA-licensed waste facilities, with disposal dockets retained.
- Reuse and recycle materials where practicable (e.g. crushed concrete for backfill).
- Minimise waste generation by accurate ordering and reduced packaging.
- Promptly remove waste from site to avoid accumulation.
- Stop works and apply specialist management if hazardous waste is identified.
- Implement a materials tracking system for spoil or material transferred between Sydney Metro West sites and to offsite facilities.
- Heavy Vehicles used for spoil haulage to have SSI Identification Sticker

Monitoring and Reporting

- Daily inspections of waste storage areas by site supervisors.

- Weekly inspections by the Environmental Manager to verify segregation and disposal practices.
- Waste dockets, classification reports, and recycling records retained in the project waste register.
- Waste performance (including diversion from landfill) reported monthly to Sydney Metro.
- Any non-conformance in waste management raised and tracked through the corrective action process.

Table 12: Waste and Spoil – Compliance Summary Table

Reference	Requirement	How this CEMP Addresses Requirement
CoA D111	Apply waste hierarchy: avoid, then reduce, reuse/recycle/recover, then treat/dispose.	Waste minimisation, reuse and recycling are prioritised; disposal only as last resort (see Control Measures).
CoA D112	Importation, storage, treatment or disposal of waste must comply with current EPL or a Resource Recovery Exemption/Order.	Any importation or disposal managed under EPL or Resource Recovery Exemption/Order; only approved facilities and systems used (see Control Measures).
CoA D113	Waste must only go to EPA-licensed or otherwise lawful sites.	Only licensed waste transporters and EPA-approved facilities used, with disposal dockets retained (see Control Measures, Monitoring).
CoA D114	Waste must be classified per EPA Waste Classification Guidelines; records retained.	All spoil and waste classified in accordance with EPA's Waste Classification Guidelines, with records maintained in project waste register (see Control Measures, Monitoring).
REMM WR1	Assess, classify, manage, transport and dispose of waste in accordance with EPA Waste Guidelines and POEO (Waste) Regulation 2014.	Integrated into classification, handling, and transport procedures (see Control Measures).
REMM WR3	Minimise construction waste by accurate material ordering and reducing packaging.	Control measure: minimise waste generation by accurate ordering and reduced packaging.
REMM WR4	Segregate waste streams to maximise reuse and recycling.	Waste storage areas clearly labelled and segregated (see Control Measures).
REMM WR5	Implement materials tracking system for transfers between SMW sites and offsite facilities.	Materials tracking system in place; dockets retained (see Control Measures, Monitoring).

9.5 Heritage and Unexpected Finds

Excavation and trenching for the kiosk works may result in the disturbance of previously unidentified heritage items or contamination. To manage this risk, an **Unexpected Finds Procedure** will be implemented to ensure compliance with statutory and project requirements.

Objectives

- Protect Aboriginal and non-Aboriginal heritage items in accordance with the project's Conditions of Approval and the Sydney Metro CEMF.
- Ensure all personnel are aware of their obligations should an unexpected find occur.
- Stop works immediately and manage finds in consultation with the appropriate authorities.

Key Risks

- Discovery of Aboriginal or non-Aboriginal artefacts, relics, or heritage items during excavation.

- Disturbance of previously unidentified contamination (e.g. asbestos, hazardous soils, fuel residues).
- Non-compliance with heritage legislation and approvals if finds are not managed correctly.
- Vibration impacts on heritage items caused by construction activities.

Control Measures

- All personnel to be inducted in the **Unexpected Finds Procedure** before commencing work.
- If a potential heritage item or contamination is discovered:
 - Stop works immediately in the affected area and make safe.
 - Notify the Site Supervisor and Environmental Manager.
 - Secure the area to prevent disturbance.
- The Environmental Manager will assess the find and notify Sydney Metro.
- For Aboriginal heritage items, consultation will occur with Registered Aboriginal Parties (RAPs) and relevant regulators as directed by Sydney Metro.
- For non-Aboriginal heritage, relevant heritage specialists and regulators will be engaged as required.
- Human remains will be managed in accordance with the Unexpected Finds and Human Remains Procedure and NSW Coroner/Police requirements.
- For contaminated materials, an environmental consultant will classify and provide management recommendations.
- Vibration monitoring will be conducted near heritage items to confirm compliance with DIN 4150 and project-specific criteria. Mitigation measures such as altered excavation methods or reduced working distances will be applied if limits are exceeded.
- Works will only recommence once clearance has been provided by Sydney Metro and/or relevant regulators.

Monitoring and Reporting

- All finds, assessments, and clearances will be documented in the site environmental log.
- Records of incidents, heritage notifications, and vibration monitoring will be maintained as part of the CEMP compliance records.
- Any unexpected finds will be reported in the monthly report to Sydney Metro and, where required, to Department of Climate Change, Energy, the Environment and Water (DCCEEW).

Refer to **Appendix Q - Sydney Metro Unexpected Heritage Finds Procedure** for detailed steps and obligations in the event of discovering Aboriginal or non-Aboriginal heritage items unexpectedly. This document has been developed in accordance with CoA Conditions D31-D33, D13, and the Heritage Act 1977. Where there is any inconsistency between the project's Conditions of Approval and this Procedure, the Conditions prevail.

Table 13: Heritage and Unexpected Finds – Compliance Summary Table

Reference	Requirement	How this CEMP Addresses Requirement
CoA D13	Heritage items not identified in Condition A1 docs must not be destroyed, modified, or affected. Unexpected finds must be managed under the Protocol (D31–D33).	Unexpected Finds Procedure applied; avoidance and redesign considered where state significant finds are identified (see Control Measures).

CoA D19	Take all reasonable steps not to harm Aboriginal objects.	Works stop immediately upon discovery; specialist Aboriginal heritage advice sought before recommencement.
CoA D20	RAPs must be informed and consulted on Aboriginal cultural heritage management.	Sydney Metro facilitates RAP consultation; contractors support engagement where relevant.
CoA D24	Unidentified Aboriginal objects: stop work, engage expert, manage via Unexpected Finds Procedure, register in AHIMS where relevant.	Procedure built into site induction and incident response; AHIMS registration undertaken by heritage specialist.
CoA D31–D33	Prepare and implement an Unexpected Finds and Human Remains Procedure in accordance with NSW Heritage guidelines; implement for all construction.	Procedure implemented on site; includes police/coroner protocols for human remains.
CoA D46–D47, D49	Vibration testing and monitoring for heritage items; advice from heritage specialist; apply conservative criteria (2.5 mm/s) if structurally unsound.	Vibration monitoring integrated into works near heritage items; mitigation and expert advice applied as required.
REMM AH3	Aboriginal archaeological remains recovered must be incorporated into heritage interpretation in consultation with RAPs.	Sydney Metro to manage; contractor to provide records and access for RAP consultation.
REMM AH4	Potential burial sites or skeletal remains to be managed via the Sydney Metro Exhumation Management Plan.	Covered under Unexpected Finds and Human Remains Procedure; Sydney Metro Exhumation Plan applied if human remains encountered.

9.6 Visual Amenity

Construction works in the North Strathfield precinct will temporarily alter the local visual environment through the presence of hoardings (installed by previous contractor), excavation, plant, and material storage. While these impacts are short term, they must be actively managed to reduce nuisance to residents, businesses, and transport users.

Objectives

- To minimise visual and landscape impacts during construction.
- To ensure hoardings, barriers, and temporary works are presented in a safe, clean, and orderly condition.
- To comply with the Sydney Metro CEMF and Conditions of Approval (including CoA A22, A23, D103, D104, and D109).

Key Risks

- Poorly maintained hoardings, fencing, or site sheds detracting from the local streetscape.
- Graffiti or signage issues creating a negative visual impression.
- Light spill from temporary lighting impacting residential receivers.
- Visual clutter from stockpiles, plant, or waste if not well managed.

Control Measures

- Install hoardings, fencing, and screens around active work areas in accordance with Sydney Metro requirements. Note: existing hoardings have been installed by the previous contractor.
- Maintain all hoardings, fencing, and acoustic sheds in a clean and tidy condition, promptly removing graffiti and repairing damage.

- Use project signage and information boards on hoardings to provide clear project identity and community contact information, consistent with CoA D103 (Wayfinding Signage).
- No commercial or promotional advertising will be displayed on hoardings or temporary works in accordance with CoA D104 (No Advertising).
- Apply the principles of Australian Standard AS 4282-1997 for control of obtrusive lighting to minimise light spill to surrounding properties and maintain a safe level of illumination for work activities and public interfaces.
- Where practicable, locate stockpiles, site sheds, and equipment away from visually sensitive areas and keep work sites orderly.
- Incorporate Crime Prevention Through Environmental Design (CPTED) principles into the layout and presentation of temporary works with public interface.

Monitoring and Reporting

- Daily inspections by the Site Supervisor to ensure hoardings, signage, and lighting are maintained appropriately.
- Weekly inspections by the Environmental Manager (or delegate) to confirm visual amenity controls are effective.
- All issues identified to be logged in the site environmental log and rectified promptly.
- Monthly reporting to Sydney Metro will include records of visual amenity inspections and any corrective actions taken.

Table 14: Visual Amenity Compliance Summary Table

Ref	Requirement	How the Requirement is Addressed in CEMP
CoA A22 & A23	Boundary screening and hoardings must be installed where construction is visible from public areas, designed and maintained to minimise visual impact.	Hoardings and boundary screens are installed (installed by previous contractor) and maintained in accordance with Sydney Metro standards and CoA A22-A23. Screening is uniform, secure, and regularly cleaned or repaired as required (see Section 9.6 Control Measures).
CoA D103	Wayfinding signage to be provided for safe pedestrian and vehicle movement around work areas.	Project signage and information boards are provided on hoardings to direct and inform the community, consistent with CoA D103.
CoA D104	No advertising or promotional signage unrelated to the project is permitted.	The project will not display any commercial advertising; only Sydney Metro project identification and information signage will be used.
CoA D109	Light spill from construction must be minimised to prevent impacts on adjacent sensitive receivers.	Lighting is designed and positioned to comply with AS 4282-1997 and CoA D109, using shielding and directional control to prevent obtrusive lighting.
LV1-LV12	Conditions relating to minimising impacts on landscape character and visual amenity, including design of hoardings, acoustic sheds, lighting controls, CPTED principles, and ongoing maintenance.	Section 9.6 of this CEMP outlines objectives, risks, and control measures for managing visual amenity during construction. Controls include installation of hoardings (installed by previous contractor) and dust screens, use of CPTED principles in site facilities, maintenance of outward-facing hoardings, and graffiti removal. All commitments are consistent with CoA LV1-LV12.
LV13	Trees removed by Stage 1 must be replaced to achieve no net loss to tree numbers and/or canopy in proximity to the site in the long term (as part of future stages of Sydney Metro West).	This requirement is addressed through the Flora and Fauna Management measures in Section 9.8, which include a Tree Protection Procedure and commitment to canopy replacement in line with LV13. Cross-referenced here as visual amenity is also directly impacted.
CEMP Section 11.2	Apply AS4282:1997 <i>Control of the Obtrusive Effects of Outdoor Lighting</i> and detail mitigation measures to minimise lighting impacts on sensitive receivers.	Section 9.6 requires application of AS4282:1997 when installing temporary and mobile light sources. Controls include shielding, directional lighting, and avoidance of spill light to nearby receivers.

Ref	Requirement	How the Requirement is Addressed in CEMP
CEMF Section 11.2	Incorporate Crime Prevention Through Environmental Design (CPTED) principles into temporary works and site facilities.	Section 9.6 requires CPTED integration in all temporary works with a public interface, including fencing, hoardings, and lighting layouts.

9.7 Flora and Fauna

Objectives

- To avoid and minimise impacts on flora, fauna, and habitat during construction.
- To retain as many mature trees and canopy as practicable and comply with offset/compensation planting requirements.
- To ensure any vegetation clearing or tree removal is undertaken in accordance with statutory approvals and the Conditions of Approval.
- To protect fauna species (including microbats) and ecological communities that may be affected by construction.

Key Risks

- Removal of mature trees and loss of urban canopy.
- Disturbance to fauna habitat, including potential microbat roosts.
- Potential harm to threatened species or ecological communities.
- Soil erosion and sedimentation impacting adjoining vegetation.
- Non-compliance with statutory approvals or Sydney Metro requirements.

Control Measures

Tree Protection Procedure – **see Appendix K Tree Protection Procedure**

- A Tree Protection Zone (TPZ) will be established around all trees to be retained, in line with AS 4970–2009 *Protection of Trees on Development Sites*.
- Where required, TPZ fencing will be installed prior to works and maintained for the duration of construction.
- No storage of materials, spoil, or equipment within the TPZ.
- No excavation, trenching, or vehicle movement permitted within the TPZ unless specifically approved and supervised by a qualified arborist.
- Where canopy trimming is required, it will be undertaken by a qualified arborist

Vegetation Clearing

- Clearing will be minimised and limited to areas essential for construction.
- A suitably qualified ecologist will inspect vegetation and any structures prior to clearing or demolition to identify potential fauna habitat (including microbat roosts).
- Any fauna encountered will be relocated by a licensed wildlife handler.
- Vegetation clearing will be staged progressively to reduce habitat disturbance.

Tree Replacement and Offsets

- Trees removed will be replaced in line with CoA C-B8 and LV13 requirements:
 - A net increase in mature trees at a minimum 2:1 ratio.
 - Replacement planting located in proximity to the site where feasible.
 - Long-term canopy outcomes delivered as part of Sydney Metro's urban design and landscaping commitments.

General Flora and Fauna Protection

- Sensitive vegetation areas outside the disturbance footprint will be fenced and signposted as "No-Go Zones."
- Measures to control erosion and sedimentation (Section 9.3 Soil and Water) will be implemented to prevent indirect impacts.
- Stockpiles, laydown areas, and access tracks will be located to avoid unnecessary vegetation disturbance.

Monitoring and Reporting

- Daily checks by the Site Supervisor to confirm fencing and controls are in place and undisturbed.
- Weekly inspections by the Environmental Manager to confirm compliance with flora and fauna management requirements.
- Pre- and post-clearing inspection records retained, including ecological inspection reports.
- Any non-compliance or fauna incident will be reported to Sydney Metro, the ER, and regulators in accordance with incident procedures.

Table 15: Flora and Fauna – Compliance Summary Table

Ref	Requirement (CoA / REMM)	How Requirement is Addressed in CEMP
C-B8	Retain as many mature trees as practicable; provide a net increase in mature trees at a 2:1 ratio by commencement of operation (or as otherwise agreed).	Tree Protection Zones (TPZs) established; canopy trimming preferred over removal; replacement tree planting at a 2:1 ratio committed (Section 9.8).
C11(a-d)	Flora and Fauna CEMP Sub-plan must include: site-specific mitigation measures; fauna (microbat) inspections; mangrove protection (if relevant); improved environmental outcomes for vegetation clearance.	Section 9.8 details: tree protection, staged clearing, pre-clearing inspections by ecologist, fauna relocation, and progressive vegetation management. No mangroves impacted for these works.
D2	Clearing of native vegetation minimised to reduce impacts on threatened ecological communities and species habitat.	Vegetation clearing limited to essential works footprint; sensitive areas fenced as "No-Go Zones"; stockpile and access locations planned to avoid vegetation disturbance.
D9	Retain as many mature trees and urban canopy as practicable; canopy trimming considered before removal.	Arborist to supervise tree works; canopy trimming undertaken where practicable before removal; TPZ fencing installed and maintained (Section 9.8).
LV13	Trees removed to be replaced to achieve no net loss of canopy/trees in proximity to the site (minimum standard).	Replacement planting program included, ensuring compliance with "no net loss" and contributing to 2:1 replanting ratio (Section 9.8).

9.8 Soils and Contamination

Construction activities involving excavation and trenching carry a low but potential risk of encountering unexpected contaminated land or asbestos. If not managed appropriately, these materials could present health, safety, and environmental risks and result in regulatory non-compliance.

Objectives

- To ensure any unexpected contamination (including asbestos) is managed safely and in accordance with statutory requirements.
- To protect the health of workers, the community, and the environment.

- To comply with Sydney Metro's CEMP, Conditions of Approval D77 and D78, and relevant EPA requirements.

Key Risks

- Disturbance of contaminated soils or asbestos-containing material (ACM) during excavation.
- Uncontrolled release of contaminants to the environment (soil, air, or water).
- Health impacts to workers or the community if asbestos fibres or contaminated material are not properly controlled.
- Regulatory non-compliance if unexpected finds are not managed in line with approved procedures.

Control Measures

- All personnel to be inducted in the **Appendix R - Unexpected Contaminated Land and Asbestos Finds Procedure**.
- If suspected contaminated material or asbestos is encountered:
 - **Stop work immediately** in the affected area and make safe.
 - Notify the Site Supervisor and Environmental Manager.
 - Secure and isolate the area to prevent access or disturbance.
- The Environmental Manager will:
 - Arrange for assessment and sampling by a suitably qualified contaminated land consultant.
 - Notify Sydney Metro and regulators if required.
 - Provide guidance on classification, management, and disposal.
- Asbestos finds will be managed in accordance with the **Work Health and Safety Regulation 2025** and SafeWork NSW requirements, including engaging a licensed asbestos removalist where necessary.
- Contaminated or asbestos waste will be tracked and disposed of at licensed facilities in accordance with the EPA Waste Classification Guidelines.

Monitoring and Reporting

- All incidents of unexpected contamination or asbestos will be recorded in the site environmental log.
- Clearance documentation from consultants and/or licensed removalists will be retained in the project files.
- Any notifiable incidents will be reported to Sydney Metro, the ER, and relevant regulators in accordance with the incident reporting procedure.
- Monthly reports to Sydney Metro will include details of any contamination management undertaken.

Table 16: Soils and Contamination – Compliance Summary Table

Ref	Requirement	How Requirement is Addressed in CEMP
D77	An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared before the commencement of construction and followed if unexpected contaminated land or asbestos (or suspected contamination) is encountered.	Addressed in Section 9.9 Soils and Contamination. Procedure included in CEMP, requiring immediate stop work, securing of area, specialist assessment, and lawful management/disposal.
D78	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	CEMP commits to full implementation of the procedure for the duration of construction, including training of personnel, incident reporting, and management in accordance with EPA and SafeWork NSW requirements. Procedure has been included in this CEMP at Appendix R.

9.9 Community and Stakeholder Engagement

The North Strathfield precinct is a sensitive urban environment with residential, commercial, and transport interfaces. Construction activities such as excavation, kiosk installation, saw cutting, and cable pulling may generate impacts to the local community in the form of noise, vibration, dust, visual amenity, and access changes. Proactive community engagement is critical to minimising disruption and maintaining trust.

Objectives

- To ensure the community and stakeholders are informed of works in advance, particularly where impacts such as noise, vibration, traffic changes, or outages may occur.
- To comply with the requirements of the Overarching Community Communications Strategy (OCCS) and Sydney Metro CEMF.
- To respond promptly and effectively to complaints, enquiries, and stakeholder issues.

Key Risks

- Community dissatisfaction due to unplanned disruptions or lack of notification.
- Complaints relating to noise, vibration, dust, or traffic impacts.
- Reputational risk for Sydney Metro and Syscon if concerns are not addressed.

Control Measures

- Implement the Overarching Community Communications Strategy (OCCS) in accordance with the CEMF.
- Provide advance notification (minimum 7 days) for all disruptive works, including noise-intensive activities, road or footpath changes, or power outages.
- Undertake consultation with affected sensitive land users during work planning, in accordance with CoA D43, to identify potential impacts and agree on suitable mitigation or scheduling measures where practicable.
- Engage in progressive consultation with the affected community regarding respite periods and mitigation options in accordance with CoA D51, ensuring that community feedback is considered in ongoing work scheduling.
- Use multiple communication channels including letterbox drops, emails, and online notifications to reach all potentially affected stakeholders.
- Maintain up-to-date contact details for community enquiries, including a 24-hour project phone line.
- Record all complaints and enquiries in the complaints register, ensuring they are acknowledged within 24 hours and closed out within 10 business days.
- Provide information to local residents on the timing and duration of high-impact activities, including respite arrangements where relevant.
- Install appropriate signage at site entry points with project and contact details.
- Coordinate with Ausgrid, Council, and emergency services for any works that affect utility services or public access.

Monitoring and Reporting

- The Stakeholder & Community Manager will maintain the complaints register and track response times.

- Monthly reports to Sydney Metro will include details of community engagement activities, notifications issued, and complaints received.
- Significant issues or unresolved complaints will be escalated to Sydney Metro immediately for resolution.

Table 17: Community and Stakeholder Engagement – Compliance Summary Table

Ref	Requirement	How the Requirement is Addressed in CEMP
B1	The Overarching Community Communication Strategy (OCCS) must be implemented for the duration of the works.	The CEMP commits to implementing the OCCS in accordance with the CEMF. Community engagement measures in Section 9.9 align with OCCS protocols.
B2	A Complaints Management System must be prepared and implemented before commencement of works and maintained for the duration of construction and 12 months after.	Section 9.9 details the complaints register and procedures. Syscon will maintain records and ensure close-out within 10 business days.
B3	Provide a 24-hour phone line, postal and email address, and mediation system for community enquiries and complaints.	Section 9.9 identifies multiple channels for communication, including a 24-hour project phone line and contact details on signage and website.
B4	Maintain a Complaints Register with prescribed information for all complaints received during works and for 12 months after completion.	Section 9.9 requires all complaints to be logged in a register with response times monitored by the Stakeholder & Community Manager.
B5	Inform complainants of privacy and disclosure arrangements in line with the Collection Statement under the Privacy and Personal Information Protection Act 1998 (NSW).	Section 9.9 refers to recording complaints in the register and ensures compliance with Sydney Metro's complaint handling protocols, including disclosure.
B10	Complaints mediation not to be enacted before the Complaints Management System has been executed for a complaint.	Section 9.9 ensures Syscon participates in the Complaints Management System and escalates unresolved complaints to Sydney Metro where required.
B11	Project website or webpage must be established and maintained with up-to-date information, documents, approvals, licences, and audit reports.	Section 9.9 requires online notification of works. Syscon will support Sydney Metro by providing relevant information for upload.
B11	Engagement with small business owners adversely impacted by construction.	Section 9.9 commits to proactive communication with local businesses through notifications, signage, and coordination with the SBOEP.
B12	Plan power and utility interruptions outside of business hours where feasible, with prior notice to affected businesses.	Section 9.9 requires advance notice (minimum 7 days) for disruptive works, including outages, to minimise impacts on businesses.
B13	Minimise impacts to business visibility and accessibility; provide clear pathways, signage, and lighting.	Section 9.9 includes commitments for signage at site entry points and coordination with Council to maintain access.
TT1	Community to be notified in advance of proposed road and pedestrian network changes.	Section 9.9 requires advance notification of traffic and access changes via multiple communication channels.

9.10 Sustainability / Resource Efficiency

Sustainability outcomes are a key requirement of the Sydney Metro West project. The EWNS works will be delivered in a way that minimises resource consumption, reduces emissions, and maximises opportunities for recycling and reuse.

Objectives

- To comply with the sustainability requirements of the Sydney Metro CEMF.
- To minimise energy use, emissions, and waste generation through efficient construction practices.

- To maximise opportunities for resource recovery and recycling.
- To report sustainability performance in accordance with Sydney Metro and TfNSW requirements.

Key Risks

- Excessive energy consumption from plant, equipment, and generators.
- Missed opportunities to reuse spoil, concrete, or packaging materials.
- Failure to record or report emissions data, resulting in non-compliance.

Control Measures

- Prepare and implement sustainability reporting in line with Sydney Metro and TfNSW requirements.
- Complete the TfNSW Air Emissions Workbook monthly to record emissions from fuel and energy use.
- Monitor fuel consumption for generators, plant, and equipment to identify opportunities for efficiency.
- Specify and use low-emission plant and equipment where practicable.
- Reuse materials (e.g. crushed concrete for backfill) and recycle waste streams where feasible.
- Source materials locally where practicable to reduce transport emissions.
- Record sustainability initiatives and achievements in project reporting.

Monitoring and Reporting

- Monthly sustainability reports submitted to Sydney Metro, including waste, emissions, and resource efficiency metrics.
- TfNSW Air Emissions Workbook completed and submitted in accordance with the required schedule.
- Evidence of recycling and reuse maintained in the project waste register.
- Sustainability performance reviewed by the Project Manager and Environmental Manager, with initiatives communicated to crews through toolbox talks and pre-starts.

Table 18: Sustainability Compliance Summary Table

Ref	Requirement	How Requirement is Addressed in CEMP
SMP1	Comply with the Sydney Metro Environment and Sustainability Policy.	CEMP commitments are consistent with the Sydney Metro E&S Policy and embedded in project objectives.
SMP2	Prepare a sustainability policy statement for the project.	Statement included in the CEMP and communicated through inductions.
SMP3	Define sustainability management team structure, roles, responsibilities, and skills.	Project organisation chart and responsibilities documented in Section 4 and Appendix.
SMP5–SMP8	Implement carbon mitigation, low-carbon, and energy efficiency initiatives.	Energy-efficient plant, low-carbon materials, and reporting measures identified in CEMP.
SMP14	Implement strategies to minimise water use and maximise non-potable sources.	Dust suppression uses non-potable water where available; potable water demand minimised.
SMP17–SMP20	Reduce material use, prioritise recycled/low-VOC materials, and reuse/recycle on-site.	Waste hierarchy applied; procurement prioritises recycled and low-impact products.
SMP23	Use only sustainably sourced and certified timber and wood products.	Procurement procedures require FSC/PEFC certification for timber.
SMP30	Develop and implement a Sustainable Procurement Policy.	Sustainable Procurement Policy appended to CEMP and applied to all purchasing.
SMP32	Prepare and implement a Social Benefits Implementation Plan.	Plan implemented in consultation with Sydney Metro; initiatives reported through CEMP updates.

10. Environmental Incident and Emergency Management

Environmental incidents and emergencies will be managed in accordance with the Sydney Metro Construction Environmental Management Framework (CEMF), the project Conditions of Approval (CoA), Appendix A of SSI-10038 planning approval, and Syscon's Integrated Business Management System (IBMS). This framework ensures that environmental risks are promptly identified, mitigated, reported, and subject to continuous improvement.

10.1 Incident definition and classification

For the purposes of this CEMP, an environmental incident is defined as:

- Any unplanned event or non-conformance that causes, or has the potential to cause, material harm to the environment, a breach of statutory requirements, or non-compliance with the CoA.
- Any exceedance of environmental criteria set out in the Conditions of Approval or relevant guidelines (e.g. ICNG for noise).
- Any significant community or stakeholder complaint relating to environmental impacts.

Incident Classification (aligned with Sydney Metro CEMF):

- Class 1 (Major Incident): Significant or widespread environmental harm; breach requiring statutory notification; formal regulatory investigation; serious impact to community or heritage; major reputational risk.
- Class 2 (Moderate Incident): Localised or temporary environmental harm; exceedance of approval criteria; medium-level community complaints; potential regulatory attention.
- Class 3 (Minor Incident): Minor, short-term impact that can be contained immediately; no breach of statutory limits; low-level community concern.

All incidents must be treated seriously, recorded, and investigated.

10.2 Notification and reporting requirements (including Sydney Metro and DPHI timeframes)

Immediate Notification Requirements (per CEMF and CoA):

- All personnel must report environmental incidents immediately to the Site Supervisor.
- The Site Supervisor must notify the Environmental Manager and Project Manager without delay.
- The Environmental Manager will:
 - Notify Sydney Metro Environment Team, the Environmental Representative (ER) and the Acoustic Advisor (AA) immediately for any Class 1 or Class 2 incidents, and as soon as practicable for Class 3 incidents.
 - Notify the Department of Planning, Housing and Infrastructure (DPHI) if required under the CoA.
 - Notify the EPA immediately if the incident triggers a pollution notification under the *Protection of the Environment Operations Act 1997*.

Written Reporting Requirements:

- A written incident report will be submitted to Sydney Metro, the ER, and AA (as relevant) within 24 hours of a Class 1 or Class 2 incident.
- An incident investigation report, including root cause analysis and corrective actions, will be submitted within 7 days (or timeframe required by CoA).

- Monthly reports will include a summary of all environmental incidents, corrective actions, and close-out status.

10.3 Response procedures (e.g. spills, exceedances, heritage finds, community complaints)

Incident and emergency response will follow the STOP – NOTIFY – CONTAIN – ASSESS – RECTIFY – REPORT principle:

1. Stop Work – Immediately cease activities in the affected area to prevent further impact.
2. Notify – Inform the Site Supervisor, Environmental Manager, and Project Manager immediately. If safe, contact emergency services if required.
3. Contain – Deploy immediate controls (e.g. spill kits, barriers, acoustic shields) to limit environmental harm.
4. Assess – The Environmental Manager will investigate the scale, cause, and potential consequences of the incident.
5. Rectify – Implement corrective measures, such as clean-up, material removal, repair, or restoration of controls.
6. Report – Record the incident in the Environmental Incident Register and report through Sydney Metro and statutory channels.

Emergency scenarios may include:

- Spills and leaks – respond using spill kits, isolate sources, and notify relevant authorities.
- Uncontrolled discharge – isolate source, deploy sediment controls, and prevent entry to stormwater.
- Noise/dust exceedances – cease the activity, deploy additional controls, and notify the community if required.
- Heritage/unexpected finds – cease work immediately, secure area, and notify Sydney Metro for specialist assessment.

10.4 Corrective and preventative action processes

All incidents will be investigated in accordance with Syscon's IBMS and Sydney Metro's incident management protocols.

- Root Cause Analysis will be conducted for all Class 1 and Class 2 incidents.
- Corrective Actions will be developed to address immediate causes and prevent recurrence.
- Preventative Actions will be identified through trend analysis of inspection findings and audit results.
- All actions will be entered into the Corrective Action Register, tracked to completion, and verified by the Environmental Manager.
- Lessons learned will be shared across the project team through toolbox talks, pre-starts, and management meetings.

10.5 Training and emergency preparedness (spill response drills, toolbox talks)

To ensure readiness to manage incidents and emergencies:

- All personnel will receive induction on environmental incident response and reporting requirements.



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- Toolbox talks will be delivered on high-risk activities, including erosion and sediment control, spill response, noise and dust exceedance, and unexpected finds.
- Spill response drills will be undertaken at least quarterly to test preparedness.
- Emergency equipment (spill kits, fire extinguishers, first aid kits) will be maintained on site at all times, with locations identified on ECMs.
- The Environmental Manager will verify preparedness through routine inspections and emergency simulations.

11. Compliance Management

11.1 Legislative and approval obligations (CoA, REMMs, licences, permits)

The EWNS Works must comply with all relevant environmental legislation, project approval requirements, and applicable guidelines. Compliance is mandatory and is monitored by Sydney Metro, the Environmental Representative (ER), and regulators including the Department of Planning, Housing and Infrastructure (DPHI) and the NSW Environment Protection Authority (EPA).

Legislation and Regulations

Key environmental legislation applicable to this project includes, but is not limited to:

- *Environmental Planning and Assessment Act 1979* (EP&A Act) – governs project approval, Conditions of Approval, and modifications.
- *Protection of the Environment Operations Act 1997* (POEO Act) – pollution control, incident notification, licensing, and penalties.
- *Biodiversity Conservation Act 2016* – protection of flora and fauna (if relevant finds occur).
- *Heritage Act 1977* – management of non-Aboriginal heritage items.
- *Aboriginal Heritage Act 2006 (NSW)* – protection of Aboriginal objects and cultural heritage.
- *Work Health and Safety Act 2011* – environmental interface with worker health and safety (e.g. hazardous substances).
- *Waste Avoidance and Resource Recovery Act 2001* – waste minimisation and recycling obligations.
- *Contaminated Land Management Act 1997* – management and reporting of contaminated sites.

Project Approvals

- Conditions of Approval (CoA) for Sydney Metro West, as issued by the Planning Secretary.
- Revised Environmental Mitigation Measures (REMMs) from the Environmental Impact Statement (EIS).
- Sydney Metro Construction Environmental Management Framework (CEMF).
- Sydney Metro's Overarching Community Communications Strategy (OCCS).

Compliance Approach

- An Obligations Register will be maintained, identifying all relevant legislative, CoA, REMM, and CEMF requirements applicable to this project.
- The Obligations Register will be reviewed monthly by the Environmental Manager and updated if new requirements arise (e.g. legislative changes, project modifications).
- All project personnel will be made aware of applicable compliance obligations through inductions, toolbox talks, and access to controlled copies of this CEMP.
- Compliance with each obligation will be demonstrated through monitoring, reporting, and recordkeeping (refer Sections 6.3, 6.4, and 12).

11.2 Obligations register

The Objectives, KPIs and Compliance Matrix (Appendix D) functions as the Obligations Register for this CEMP. The register identifies all applicable environmental obligations, including those arising from Conditions of Approval (CoA), Revised Environmental

Mitigation Measures (REMMs), the Sydney Metro CEMF, licences, permits, and relevant legislation. The Obligations Register includes the following information for each requirement:

- Source of Obligation – e.g. CoA, REMM, CEMF requirement, legislative requirement.
- Reference – clause number, condition reference, or legislative section.
- Requirement – summary of the obligation in plain language.
- Applicable Project Activity – the specific work stage or activity to which the obligation applies (e.g. excavation, kiosk installation, cabling, reinstatement).
- Responsible Role – the project role accountable for ensuring compliance (e.g. Environmental Manager, Site Supervisor, Project Manager).
- Method of Compliance / Control – how the obligation will be met, including relevant sub-plans, ECMs, permits, or procedures.
- Records / Evidence – the documents or records that demonstrate compliance (e.g. inspection checklists, monitoring results, notification letters, waste dockets).
- Status – compliance status (Compliant / Non-compliant / Open action).

This register will be reviewed regularly and updated following audits, management reviews, or changes in scope or legislation.

11.3 Compliance tracking and audits (Sydney Metro, ER, DPHI, Syscon internal)

Compliance with environmental obligations will be systematically tracked, reviewed, and audited to provide assurance that the EWNS Works are being delivered in accordance with the Conditions of Approval (CoA), CEMF, REMMs, and relevant legislation.

Compliance Tracking

- The Obligations Register (refer Section 11.2) will be the primary tool for tracking compliance, with responsibilities, controls, and evidence identified for each requirement.
- Compliance status will be reviewed monthly by the Environmental Manager, and corrective actions assigned where gaps are identified.
- Site supervisors will conduct daily inspections to check compliance with site-level controls (e.g. erosion and sediment controls, dust suppression, waste storage).
- The Environmental Manager will conduct weekly inspections and issue inspection reports that document compliance status and corrective actions.
- Hold points identified in the CEMP (e.g. installation of erosion controls prior to excavation) will be used as key compliance checkpoints.

Internal Audits

- Syscon will conduct internal audits in accordance with its Integrated Business Management System (IBMS) and ISO 14001 certification.
- Internal audits will review the implementation of the CEMP, subplans, and compliance with CoA, REMMs, and relevant legislation.
- Audit findings will be documented in audit reports, with corrective and preventative actions tracked in the Corrective Action Register until close-out.

External Audits and Reviews

- Sydney Metro and the Environmental Representative (ER) will conduct independent site inspections and audits to verify compliance.

- The ER will review CEMP implementation and environmental performance on behalf of the Planning Secretary, including approval of revisions and corrective actions.
- The Department of Planning, Housing and Infrastructure (DPHI) and the EPA may undertake regulatory audits or inspections at any time.
- Audit outcomes will be formally reported, with all findings and corrective actions logged and tracked to closure by the Environmental Manager.

Corrective and Preventative Actions

Any non-compliance or audit finding will result in corrective actions being raised by the Environmental Manager. Corrective actions will be assigned to the responsible role, tracked in the Corrective Action Register, and verified as complete through follow-up inspection or audit. The corrective actions process will identify and record

- Initial actions that must be taken immediately to contain the problem
- Corrective actions that must be taken to prevent further occurrence

Lessons learned will be shared across the project team to prevent recurrence.

Learnings will be shared across other Syscon projects to ensure appropriate preventative actions are in place.

Reporting

Compliance tracking results, audit outcomes, and corrective action status will be summarised in the reports to Sydney Metro. Any non-compliance will also be reported immediately to Sydney Metro and the ER in accordance with Section 10 (Incident and Emergency Management).

11.4 Reporting requirements (monthly, incident notifications, sustainability reports, TfNSW Air Emissions Workbook)

Reporting provides transparency and ensures that environmental performance is communicated consistently to project personnel, Sydney Metro, and regulators. For the EWNS works, reporting obligations extend from daily site-level communications through to statutory notifications of incidents.

At the project level, environmental issues are raised during daily pre-start briefings and weekly coordination meetings. These discussions ensure that environmental risks are considered in planning daily tasks and that any emerging issues are addressed promptly. Site Supervisors record daily inspection findings in their site diaries, while the Environmental Manager consolidates these into weekly inspection reports for review by the Project Manager.

Formal reporting to Sydney Metro occurs on a monthly basis. The Environmental Manager prepares a monthly environmental performance report which includes monitoring results, inspection findings, incidents, community complaints, and the status of corrective actions. Sustainability data, including the Transport for NSW Air Emissions Workbook and resource recovery performance, is also reported monthly.

In addition to routine reports, certain events trigger immediate notification. Environmental incidents that meet the statutory definition under the *Protection of the Environment Operations Act 1997* are reported without delay to the NSW EPA, the Department of Planning, Housing and Infrastructure (DPHI), and Sydney Metro. The Environmental Representative (ER) must also be informed immediately of significant incidents. A written incident report is provided within 24 hours, with a detailed investigation report following within the timeframe specified by the Conditions of Approval.

To maintain accountability, all reports are stored in Syscon's document management system as controlled records. These include:

- Daily site diaries and checklists
- Weekly inspection reports
- Monthly environmental and sustainability reports
- Incident and complaint records
- Audit and compliance tracking reports

These reporting processes ensure that performance is monitored at multiple levels and that compliance with both project approvals and legislative requirements can be demonstrated at all times.

12. Document Control and Records

12.1 Document version control and distribution

Effective document control and recordkeeping are critical to demonstrating compliance with project approvals, statutory obligations, and the requirements of the Sydney Metro CEMP. This section sets out how environmental documents and records for the EWNS project will be managed.

All CEMP documentation, including subplans, appendices, and Environmental Control Maps (ECMs), are treated as controlled documents under Syscon's Integrated Business Management System (IBMS). Controlled documents are issued with version numbers, revision dates, and distribution records to ensure only the current, approved version is in use. Superseded versions are removed from circulation and archived. The Environmental Manager is responsible for maintaining document control on site and ensuring that project personnel have access to the latest approved versions.

Environmental records are maintained as evidence of compliance. These include, but are not limited to:

- Inspection checklists and monitoring results
- Incident and complaint registers
- Waste tracking dockets and spoil classification reports
- Induction and training records
- Audit reports and corrective action registers
- Monthly environmental and sustainability reports submitted to Sydney Metro.

Records are stored electronically in Syscon's document management system, with restricted access to ensure integrity and traceability. Hard copies of critical documents, such as the CEMP, ECMs, and subplans, are also maintained in the site office for quick reference by site personnel and contractors. All records are retained for the duration of the project and in accordance with legislative requirements, and will be made available to Sydney Metro, the Environmental Representative (ER), or regulators on request.

Where the CEMP or subplans are revised, the Environmental Manager will ensure that all personnel are briefed on the changes through toolbox talks, pre-start meetings, or targeted communications. This ensures that updates are not only controlled in documentation but also effectively communicated and implemented on site.

12.2 CEMP and subplan review/update procedures

This CEMP and its supporting subplans are live documents that will be reviewed and updated as required to ensure they remain current and effective. Formal reviews will be undertaken at least annually, and earlier if there are significant changes to:

- The scope, staging, or methodology of works
- The Conditions of Approval, CEMP, or other statutory requirements
- Environmental risks identified through monitoring, audits, or incidents

All revisions will be clearly identified with version control, reviewed internally by Syscon's Project Manager and Environmental Manager, and submitted to Sydney Metro and the Environmental Representative (ER) for approval prior to implementation. Where required, revisions will also be provided to the Department of Planning, Housing and Infrastructure (DPHI).

Once approved, revised versions will be distributed to all project personnel and contractors, with changes communicated through toolbox talks, pre-starts, or targeted briefings. Superseded versions will be archived to maintain traceability.

12.3 Recordkeeping requirements

Syscon will maintain environmental records as evidence of compliance with this CEMP, the CoA, and the CEMF. Records will include, but are not limited to:

- Daily site inspection checklists and supervisor diaries
- Weekly environmental inspection reports prepared by the Environmental Manager
- Noise, vibration, dust, and water monitoring results
- Community complaints register and correspondence records
- Environmental incident and corrective action registers
- Waste tracking dockets, spoil classification reports, and recycling receipts
- Induction and training attendance sheets
- Audit reports, compliance tracking tools, and ER directions.

Records will be reviewed regularly by the Environmental Manager to verify completeness and accuracy. They will also be consolidated into monthly reports to Sydney Metro, ensuring ongoing accountability.

12.4 Retention and accessibility of records

All environmental records will be managed under Syscon's Integrated Business Management System (IBMS) and retained for the duration of the project and any statutory period required by law or Sydney Metro's protocols.

Electronic records will be stored securely in the project's document management system with restricted access to preserve integrity. Hard copies of key records, such as ECMs, permits, and current versions of the CEMP and subplans, will be maintained in the site office for quick reference by project personnel and regulators.

Records will be made available on request to Sydney Metro, the Environmental Representative (ER), and regulators such as DPHI and the EPA. At the conclusion of the project, records will be archived in accordance with Syscon's IBMS requirements and Sydney Metro's handover protocols.

13. References

This CEMP has been prepared with reference to the following key documents, legislation, standards, and guidelines.

Table 19: Legal and Other Requirements

Category	Name
Legislation and Statutory Instruments	Environmental Planning and Assessment Act 1979 (NSW)
	Protection of the Environment Operations Act 1997 (NSW)
	Biodiversity Conservation Act 2016 (NSW)
	Heritage Act 1977 (NSW)
	Waste Avoidance and Resource Recovery Act 2001 (NSW)
	Contaminated Land Management Act 1997 (NSW)
	Work Health and Safety Act 2011 (NSW)
Sydney Metro and Project-Specific Documents	Sydney Metro West – Conditions of Approval (CoA)
	Sydney Metro Construction Environmental Management Framework (CEMF)
	Sydney Metro Overarching Community Communications Strategy (OCCS)
	Revised Environmental Mitigation Measures (REMMs) from the Sydney Metro West EIS
Guidelines and Standards	NSW Environment Protection Authority, Waste Classification Guidelines (2014)
	Department of Planning, Industry and Environment, Interim Construction Noise Guideline (ICNG, 2009)
	Department of Planning, Industry and Environment, Managing Urban Stormwater: Soils and Construction (the “Blue Book”)
	Transport for NSW, Air Emissions Workbook
	ISO 14001:2015 Environmental Management Systems – Requirements with Guidance for Use
	Syscon Integrated Business Management System (IBMS), including environmental procedures, forms, and registers.

14. Appendices

Appendix A – Conditions of Approval (CoA) Matrix

A schedule of all Conditions of Approval relevant to this CEMP, with references to where each requirement is addressed in the plan.

Table 20: Schedule of Conditions of Approval

Ref	Requirement	Where Addressed in CEMP / Sub-plans
D34	A detailed land use survey must be undertaken to confirm sensitive receivers potentially exposed to construction noise and vibration.	Section 9.1 Noise and Vibration; CNVMP; DNVIS (if required).
D35	Work must only be undertaken during standard construction hours (Mon–Fri 7am–6pm; Sat 8am–6pm; not on Sundays/public holidays).	Section 9.1 Noise and Vibration; CNVMP.
D36	Highly noise intensive work only permitted Mon–Fri 8am–6pm; Sat 8am–1pm; continuous work limited to 3 hours with 1-hour breaks.	Section 9.1 Noise and Vibration; CNVMP.
D37	Work outside standard hours only permitted under safety/emergency, low-impact, by EPL, by approval, or for prescribed activities (e.g. tunnelling, acoustic shed work).	Section 9.1 Noise and Vibration; Out-of-Hours Works Protocol; CNVMP.
D39	Construction noise and vibration criteria must be consistent with ICNG (2009), DEC (2006), AS 2187.2, BS 7385, DIN 4150.	Section 9.1 Noise and Vibration; CNVMP; DNVIS.
D40	Residential ground-borne noise levels not to exceed 40 dB(A) evening / 35 dB(A) night. Mitigation to be outlined in CNVMP and Out-of-Hours Work Protocol.	Section 9.1 Noise and Vibration; CNVMP; DNVIS.
D41	Noise-generating work not to be scheduled within sensitive periods for community, religious, or educational institutions unless otherwise agreed.	Section 9.1 Noise and Vibration; CNVMP.
D42	Best-practice noise mitigation to be applied (low sound power equipment, temporary barriers, alternative techniques).	Section 9.1 Noise and Vibration; CNVMP.
D43–D45	Detailed Noise and Vibration Impact Statements (DNVIS) required for works exceeding NMLs or vibration criteria, with consultation and mitigation measures implemented.	Section 9.1 Noise and Vibration; DNVIS.
D46–D49	Vibration monitoring and heritage protection measures to be implemented, with specialist advice and conservative vibration criteria applied for fragile items.	Section 9.5 Heritage and Unexpected Finds; Section 9.1 Noise and Vibration; CNVMP.
D50–D51	Respite periods for out-of-hours work to be developed in consultation with community; progressive schedules provided; outcomes documented.	Section 9.1 Noise and Vibration; Section 9.10 Community and Stakeholder Engagement.
D111–D114	Waste must be avoided, reduced, reused, recycled, or lawfully disposed of; classified per EPA guidelines; disposal dockets retained.	Section 9.4 Waste and Spoil.
WR1–WR5	Waste assessed, classified, managed in accordance with Waste Classification Guidelines and POEO Waste Reg 2014; materials tracking system to be implemented.	Section 9.4 Waste and Spoil.
D116	Erosion and sediment controls must be implemented in accordance with Landcom <i>Managing Urban Stormwater: Soils and Construction</i> (Blue Book).	Section 9.3 Soil and Water.
SSWQ3	Erosion and sediment measures, sediment basins, and water treatment to be consistent with <i>Blue Book</i> Vol 1 & Vol 2D.	Section 9.3 Soil and Water.



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Ref	Requirement	Where Addressed in CEMP / Sub-plans
D13, D19–D20, D24, D31–D33	Unexpected Finds Procedure for Aboriginal and non-Aboriginal heritage; works must stop until assessment and clearance provided; RAPs consulted.	Section 9.5 Heritage and Unexpected Finds; Appendix Q
AH3–AH4	Aboriginal heritage interpretation to be incorporated if remains are recovered; Exhumation Management Plan applies if human remains found.	Section 9.5 Heritage and Unexpected Finds.
C1 – C10	Development and approval of the CEMP and Subplans prior to the commencement of construction	Section 12.2
C11	Flora and Fauna Sub-plan must include mitigation, microbat roost inspections, mangrove protection (Clyde site), and vegetation clearance details.	Section 9.8 Flora and Fauna; Appendix [Tree Protection Procedure].
C14	Not applicable according to phasing report. Environmental monitoring undertaken for due diligence etc.	Section 6.3 Monitoring, Inspection and Auditing
D2, D9, LV13	Clearing of native vegetation to be minimised; mature trees retained where practicable; tree replacement to achieve no net loss.	Section 9.8 Flora and Fauna; Appendix K – Tree Protection Procedure].
D77–D78	Unexpected Contaminated Land and Asbestos Finds Procedure to be prepared and implemented if contamination encountered.	Section 9.9 Soils and Contamination.
AIR QUALITY	All practicable measures to minimise dust and air pollutants during construction.	Section 9.2 Air Quality and Dust.
CEMF 3.1(b)(v)	Environmental Risk Assessment to be prepared and included in Appendix 1.	Appendix 1 – Environmental Risk Assessment.
CEMF 3.6(c)	Environmental Control Maps to be prepared and included in Appendix C.	Appendix C – Environmental Control Maps.
CEMF 3.9; CoA D116	Erosion and Sediment Control Plan (ESCP) to be prepared and implemented.	Section 9.3 Soil and Water; Appendix C – ECMs.
CEMF 3.4(d)(xii)	Emergency and Incident Management Procedures to be included.	Section 10; Appendix B.
CEMF 3.4(d)(iii)	Matrix of CoAs and REMMs demonstrating compliance.	Appendix A (this table).

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Appendix B – Environmental Aspects and Impacts Register

Project-specific risk assessment identifying environmental aspects, impacts, risk ratings, and mitigation measures.

Table 21: Environmental Aspects and Impacts Register/Risk Assessment

Activity / Aspect	Potential Environmental Impact	Risk Rating (Pre-Mitigation)	Mitigation / Control Measures	Residual Risk Rating	Reference (CEMF / CoA / REMM)
Excavation & trenching	Soil erosion, sediment-laden runoff entering stormwater, instability of excavations.	Medium	Install erosion/sediment controls (silt fence, inlet protection), stabilise disturbed areas, progressive reinstatement, daily inspections.	Low	CEMF 12.1–12.2; CoA D116; SSWQ3
Spoil handling & storage	Dust, stockpile runoff, uncontrolled disposal, amenity impacts.	Medium	Cover/contain spoil, place away from drains, classify spoil, reuse/recycle where possible, licensed disposal.	Low	CoA D111–D114; WR1–WR5
Concrete cutting / saw cutting	Dust, slurry runoff contaminating soil/water, noise.	Medium	Water suppression, bunded washout areas, collect slurry, noise controls per CNVMP.	Low	CoA D35–D37, D42
Vehicle & plant movements	Dust, exhaust emissions, soil tracking onto roads, traffic impacts.	Medium	Maintain vehicles, restrict speeds, wheel-wash or street sweeping, dust suppression, traffic controls.	Low	CoA AIR QUALITY; NV14
Fuel & chemical storage	Soil and water contamination from leaks/spills.	High	Bunded storage, spill kits at refuelling points, trained personnel, incident response procedures.	Low	CEMF 3.4(d) (xii)
Vegetation clearance / tree trimming	Loss of habitat, disturbance to fauna, damage to retained trees.	Medium	Tree Protection Procedure, pre-clearing inspections, RAP consultation if Aboriginal heritage impacted, minimise clearance.	Low	CoA C11, D2, D9; LV13
Encountering unexpected heritage item	Damage or loss of Aboriginal or non-Aboriginal heritage values.	Medium	Implement Unexpected Finds Procedure, stop work, notify EM/Sydney Metro, consult RAPs/heritage specialists.	Low	CoA D13, D19–D24, D31–D33; AH3–AH4
Noise from excavation, saw cutting, vehicles	Amenity impacts, sleep disturbance, complaints from sensitive receivers.	High	Implement CNVMP, work within standard hours (CoA D35), respite periods, barriers/screens, community notification.	Medium	CoA D34–D45, D50–D51; REMM NV01–NV18
Air quality – dust from stockpiles, excavation	Nuisance dust, health impacts, community complaints.	Medium	Wet down work areas, cover loads, limit stockpiles, monitoring, respond to complaints, IAQM guidance.	Low	CoA AIR QUALITY
Waste generation (packaging, offcuts, general)	Landfill burden, pollution risk if mismanaged.	Medium	Segregate waste streams, maximise reuse/recycling, licensed disposal, maintain waste register.	Low	CoA D111–D114; WR3–WR5



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Activity / Aspect	Potential Environmental Impact	Risk Rating (Pre-Mitigation)	Mitigation / Control Measures	Residual Risk Rating	Reference (CEMF / CoA / REMM)
Unexpected contamination / asbestos	Worker health risk, soil/water contamination, delays.	High	Stop work, implement Unexpected Contaminated Land & Asbestos Finds Procedure, engage specialist consultant.	Low	CoA D77-D78
Community engagement	Complaints, loss of trust, reputational risk.	Medium	Implement OCCS, notify 7 days prior, maintain complaints register, 24-hr project line.	Low	CEMF 5; CoA D50-D51
Visual amenity (site hoarding, stockpiles)	Reduced visual amenity, graffiti, lighting impacts.	Low-Medium	Maintain hoarding/barriers, remove graffiti promptly, comply with AS 4282 for lighting.	Low	CEMF 11.2

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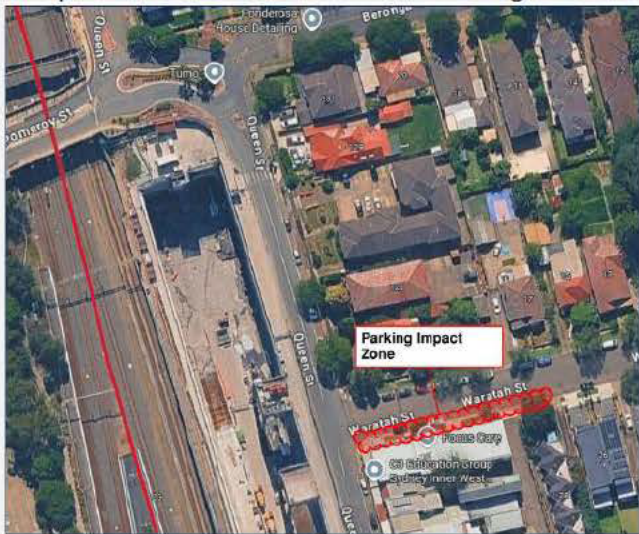
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Appendix C – Preliminary Environmental Control Maps (ECMs)

Note: It is noted that the ECMs included in this Plan are separate documents that are edited independently of this Plan and will progressively change. The ECMs included in this Plan will not be updated as ECMs are updated.

Table 22: Environmental Control Maps

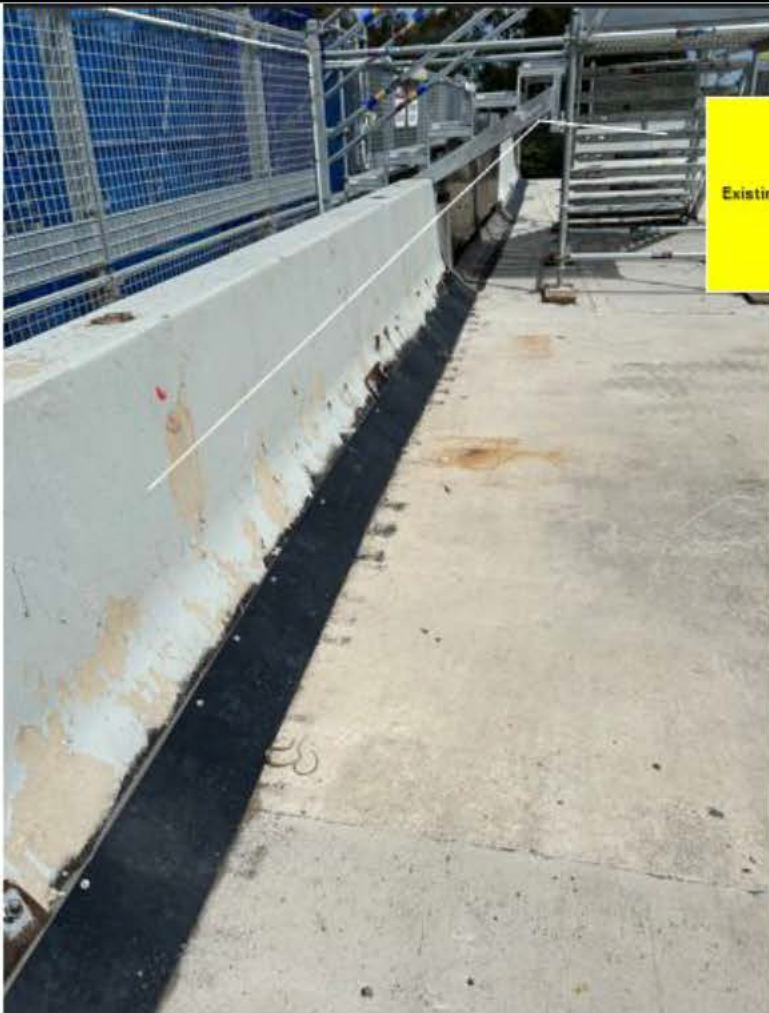
Requirement	Comment
Boundaries	See Work Locations map below.
Project Traffic Routes	See Traffic Management Plans for detailed traffic routes, including maps.
Sensitive Receivers	Sensitive Receivers include Commercial/Business, Commercial/Residential, Education, Residential, and Transport/Infrastructure. These are identified on the map below and in detail in the Construction Noise and Vibration Management Plan (CNVMP).
Site Office and amenities	A site shed will not be set up due to space restrictions. A Portaloo will be set up on site for the duration of the project. Exact location to be confirmed, but will likely be in the South West corner or the main worksite.
Parking	Temporary parking restrictions will be required along Waratah Street to facilitate high-voltage joint bay excavation, pre-outage works, outage cut-ins, and permanent restoration activities. Parking will be reinstated at the completion of each shift. 




Requirement	Comment
Monitoring Equipment	Where required, monitoring equipment will be placed within the boundaries of the electrical works areas. Locations to be prior to commencement of works
Waste Management Facilities	Waste management facilities will be contained within the main worksite on the corner of Queen and Pomeroy streets. Bins for waste and recycling will be retained for the duration of the project for use by all worksites as required. Exact bin locations to be determined prior to commencement of works and may be moved around as required to make space for work activities.
Erosion and Sediment control measures	<p>Controls – set-up (before works)</p> <ol style="list-style-type: none">Perimeter containment<ul style="list-style-type: none">Fit continuous silt socks or filter sausages along the inside toe of the hoarding.Seal gaps under hoarding with sediment control socks to stop dirty water escaping.Inlet protection (public footpath/road)<ul style="list-style-type: none">Identify the nearest pits; install pit protection: silt socks surrounding the pit.Keep protection removable for maintenance and ensure flow bypass is maintained for high-intensity storms.Inlet protection (main worksite)<ul style="list-style-type: none">Install pit protection: silt socks surrounding the pit and grill wrapped in geotextileMaterials/stockpiles<ul style="list-style-type: none">There will be no stockpiles on the hardstand.Spoil to be removed immediately offsite to Syscon facility at Prospect.Spill preparedness<ul style="list-style-type: none">There is one spill kit on site.Fuel and chemicals on site will be limited to small quantities retained in tool truck which will leave site each day.Housekeeping<ul style="list-style-type: none">Daily sweeping of hardstand with a shovel/brush or vacuum sweeper—no hosing.Waste bins covered and litter contained.All controls (silt socks, mesh, etc) inspected daily.Retain existing flood mitigation<ul style="list-style-type: none">Existing flood barriers will be retained during the project1 curb to be removed temporarily during trenching and replaced as soon as practicable.Trenching not to be carried out if flooding is expected <p><u>Controls – during works</u></p> <ul style="list-style-type: none">Maintain all controls; clear build-up on silt socks when sediment reaches one-third of height.Keep the footpath clear for pedestrians; remove tracked material immediately using dry methods.Schedule high-risk activities (cutting/concrete pours) to avoid rain; protect work areas with temporary covers.

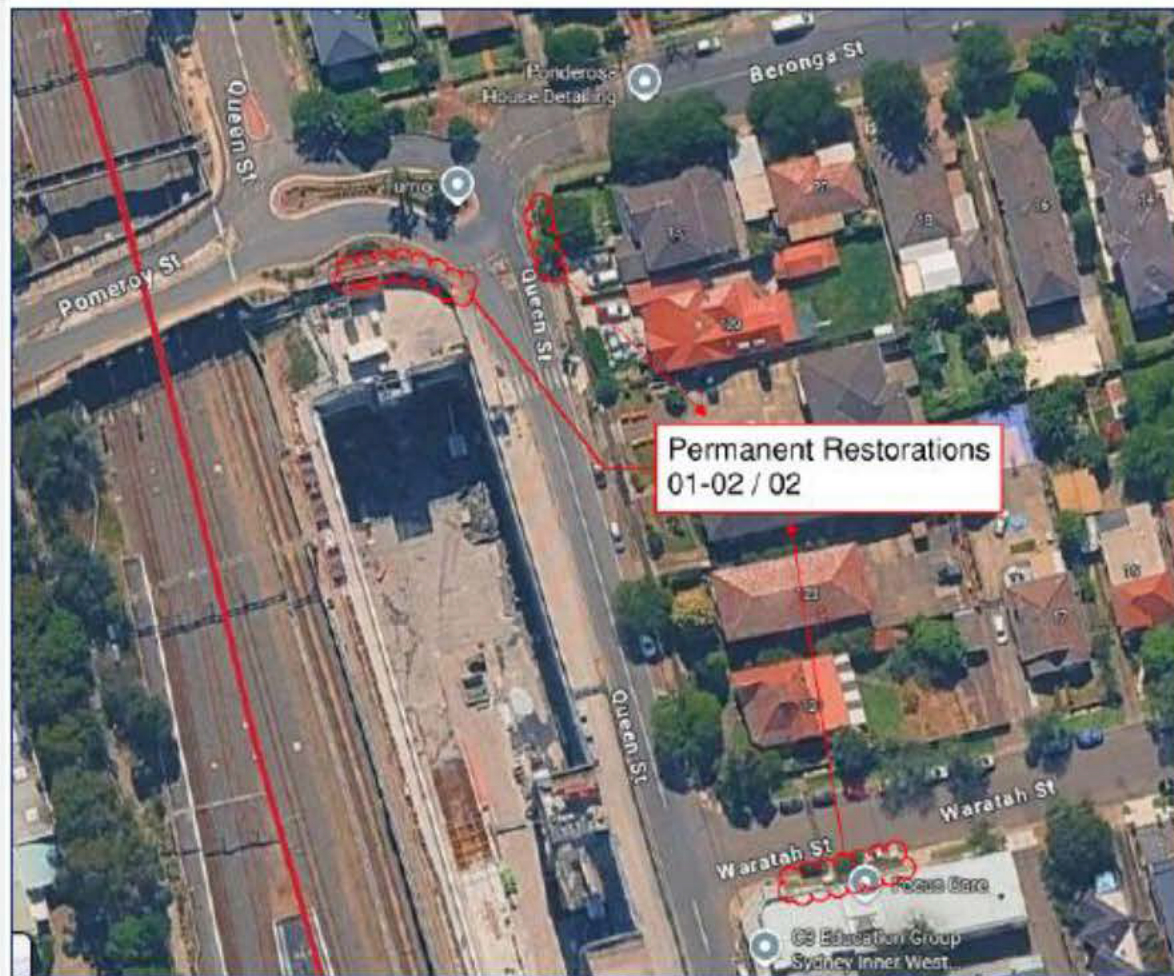


Requirement	Comment
	 <p>Drains</p> <p>Sediment socks to be placed around drains:</p> <ul style="list-style-type: none"> - Outside the main work site - Nearest to works carried out at external sites on Waratah St. and Queen St.

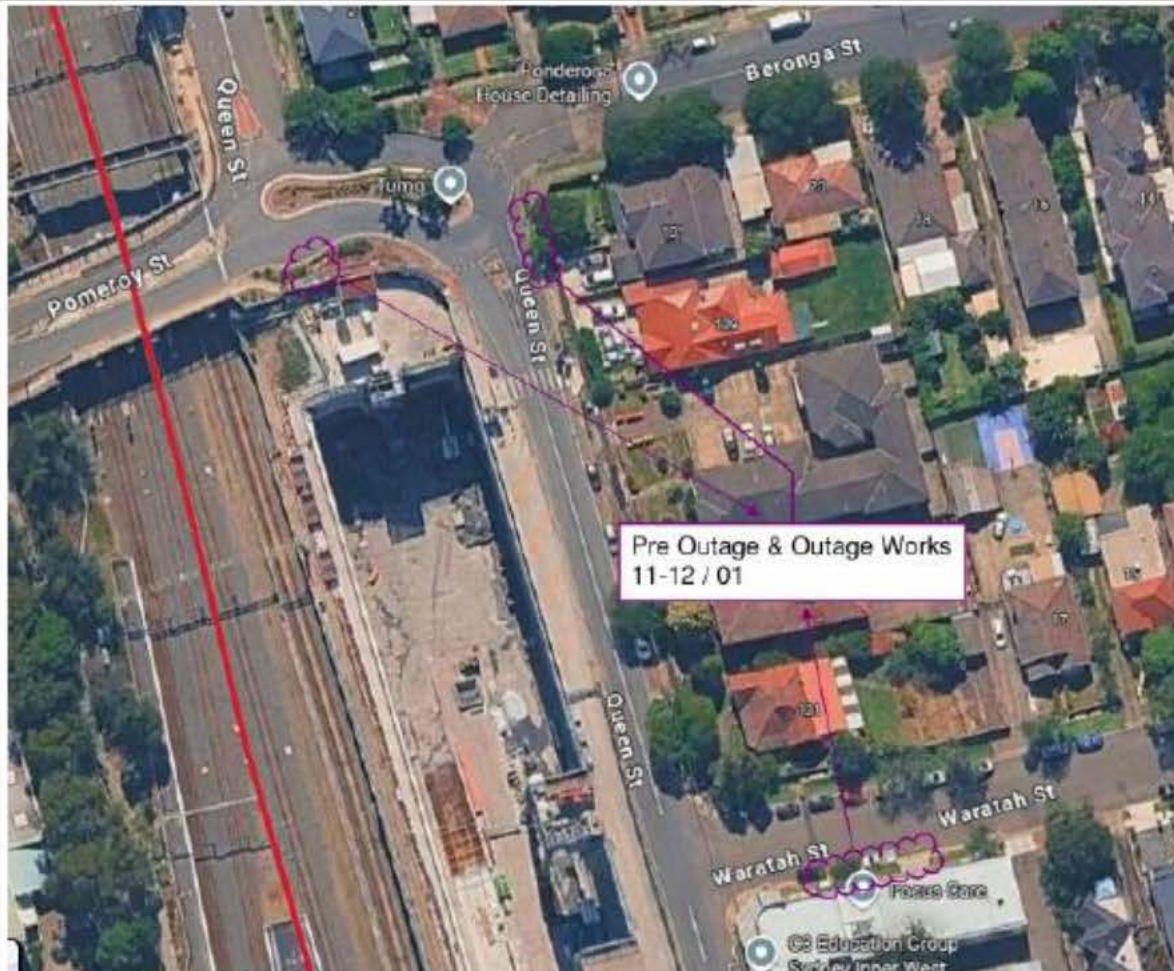
Requirement	Comment
	 <p data-bbox="1160 373 1379 405">Flood Mitigation</p> <p data-bbox="1050 432 1494 475">Existing barriers with rubber flaps to remain in place to prevent water flow to station.</p>
Access	Access to the work site will be via Queen Street at the designated entry point shown. This access location has been selected to minimise disruption to local traffic and residents. The requirement is to nose in, nose out of the site access location

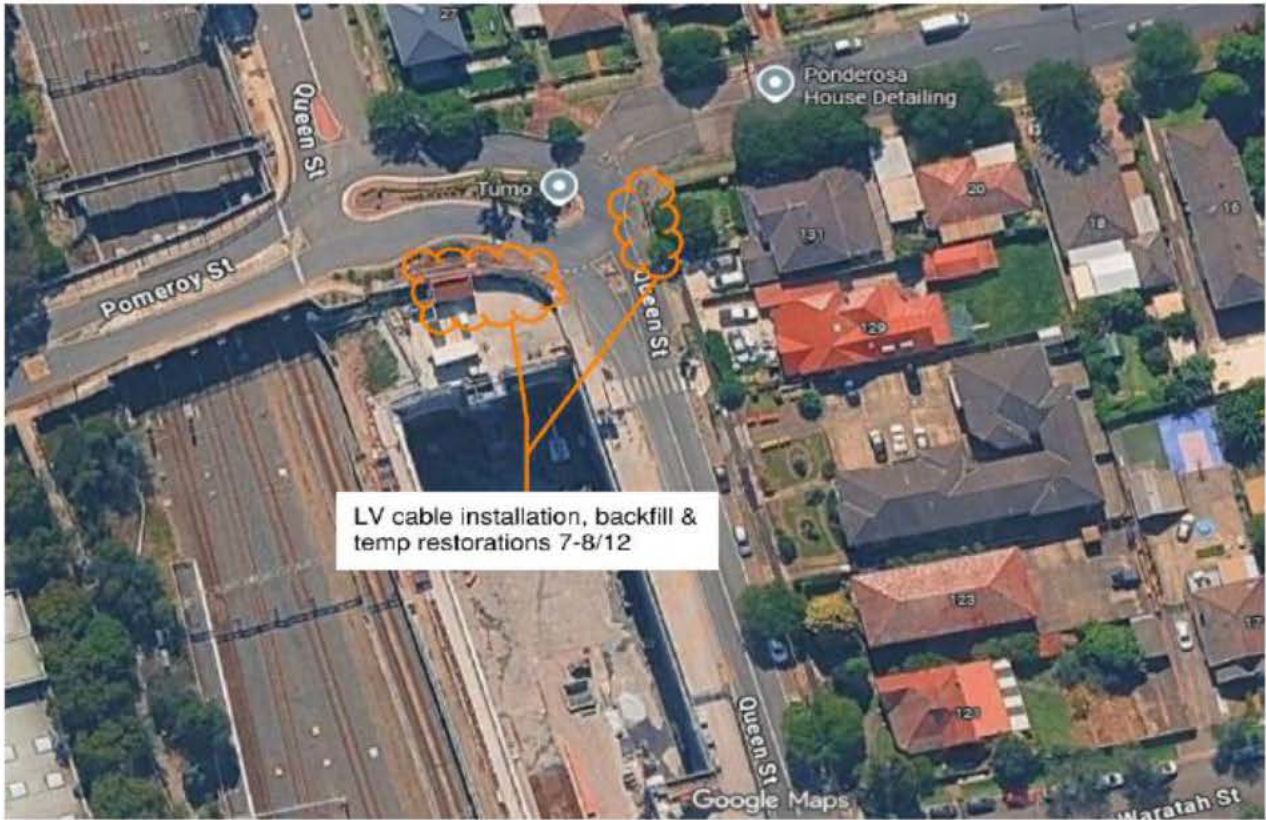
Requirement	Comment
	
Working Hours	<p>Internal Works (within project site compound):</p> <ul style="list-style-type: none"> • 7:00am – 6:00pm, Monday to Friday • No community impact anticipated <p>External Works (affecting local area):</p> <ul style="list-style-type: none"> • 6:00pm – 5:00am, Sunday & Monday Nights • Subject to approved Road Occupancy Licences (ROLs) • Planned to minimise traffic disturbance • Planned to complete noisy OOHW's work before midnight

Work
locations



Requirement	Comment
	

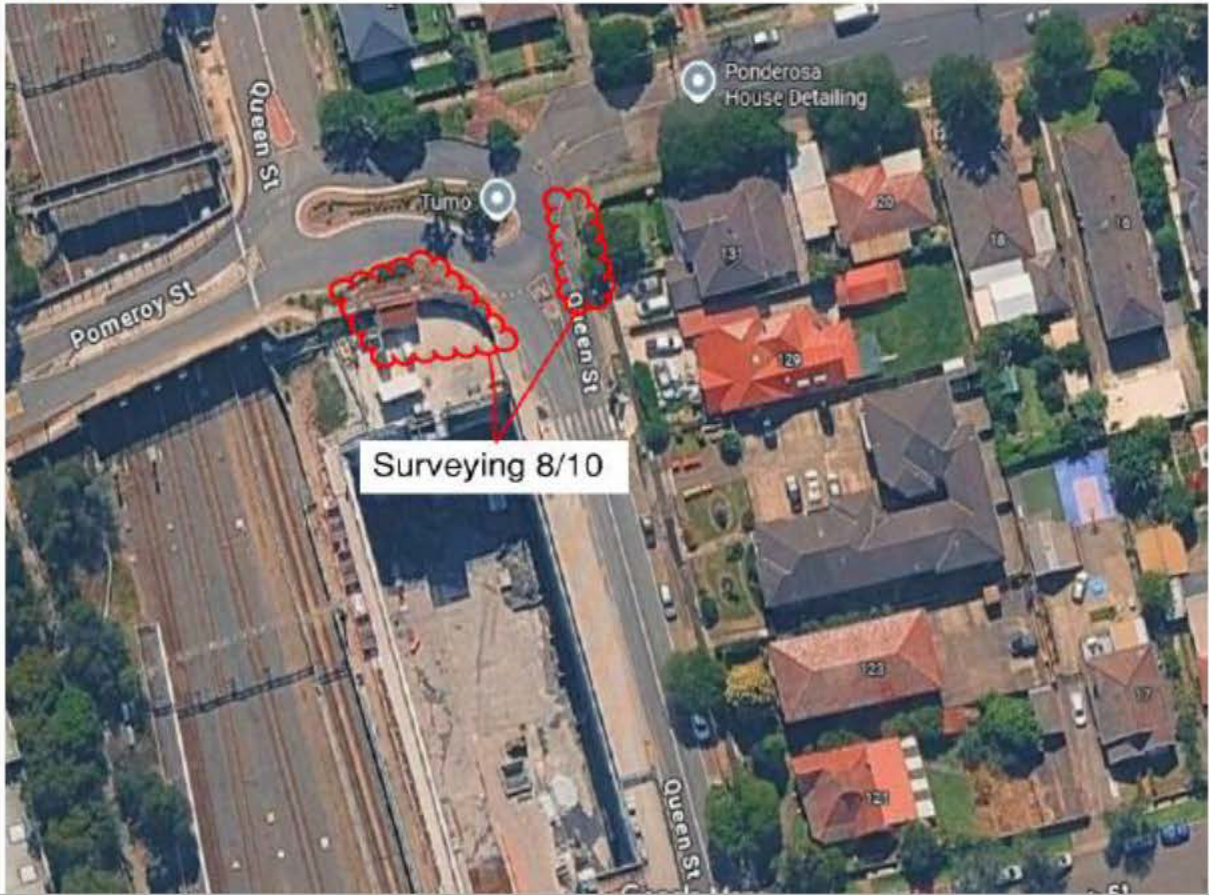


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Requirement	Comment
Storm water, drainage and water courses	<p>Dewatering and ponded water</p> <ol style="list-style-type: none"> 1. Assess: If water is clear with no sheen and turbidity is comparable to upstream street runoff, it may be discharged through a sediment bag and silt sock onto a stable vegetated area. 2. If turbid: Allow to settle for ≥ 2 hours. If still turbid, add approved flocculant per SDS and manufacturer instructions; re-settle. 3. Test: Check for pH (6.5–8.5), no visible oil sheen. 4. Discharge method: Pump at low rate through sediment bag → silt sock → level spreader so there is no scour. Never discharge to pits directly.



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Requirement	Comment
	<p>5. Records: Keep date/time, volume estimate, treatment used, test results and discharge point.</p> <p>Wet weather readiness and triggers</p> <ul style="list-style-type: none">• Forecast trigger: If BOM forecasts ≥ 10 mm in 24 h, implement wet-weather actions below.• Actions:<ul style="list-style-type: none">○ Sweep hardstand, ensure spare socks available.○ Inspect after first safe opportunity once rainfall stops; repair/replace damaged controls within 24 h.• Storm event: For events ≥ 20 mm in 24 h, the HSEQ Manager reviews performance and authorises any discharge or additional controls. <p>Footpath and public interface controls</p> <ul style="list-style-type: none">• Maintain a temporary barrier inside the hoarding line during works that involve opening/closing the gate to avoid uncontrolled run-off.• Keep service pits on the footpath protected at all times with; maintain access for utility crews.• Undertake daily edge sweeping along the hoarding line to remove fines, especially around pit lids and utility cuts.

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Figure 2: NCAs and land use types in proximity to the work areas



Figure 3: Electrical Kiosk installation and enabling works



Appendix D – Objectives, KPIs and Compliance Matrix

A matrix linking CEMF obligations to project objectives, KPIs, responsibilities, and evidence requirements (prepared as part of Section 8).

Table 23: Objectives, KPIs and Compliance Matrix

CEMF Obligation / Condition	CEMF Requirement	Project Objective	Key Performance Indicator (KPI)	Responsibility	Evidence / Records
CEMF 3.1 – Certification to AS/NZS ISO 14001:2016	Maintain certification to ISO 14001 and implement an Environmental Management System consistent with that standard.	Maintain an effective Environmental Management System (EMS) consistent with ISO 14001.	Current ISO 14001 certification maintained.	Syscon Project Manager	Copy of current certification; annual surveillance audit reports.
CEMF 3.4(d)(iii) – Matrix of relevant CoAs and REMMs	Each CEMP must include a matrix cross-referencing the Conditions of Approval (CoAs) and Revised Environmental Mitigation Measures (REMMs) showing where each is addressed.	Demonstrate compliance with all Conditions of Approval (CoAs) and Revised Environmental Mitigation Measures (REMMs).	100 % of applicable CoAs/REMMs addressed in CEMP or sub-plans.	Environmental Manager	CoA/REMM matrix; CEMP and sub-plans cross-referenced.
CEMF 3.4(d)(xii) – Emergency and Incident Management Procedures	The CEMP must include procedures for emergency and incident management, non-compliance management, and corrective/preventive action.	Ensure all incidents are effectively managed and reported in accordance with legal and project requirements.	All incidents logged, classified, and reported within required timeframes.	Environmental Manager / Site Supervisor	Incident and Emergency Management Procedure; incident register; Sydney Metro notifications.
CEMF 3.6(c) – Environmental Control Maps (ECMs)	Contractors must prepare and implement site-based progressive Environmental Control Maps showing controls, approvals, and sensitive receivers.	Implement clear site-based environmental controls to protect sensitive receptors.	ECMs prepared and displayed on site prior to works commencing.	Site Supervisor / Environmental Manager	Approved ECMs in Appendix C; site inspection checklists; toolbox records.
CEMF 3.9 & 12.2(b); CoA D116 – Erosion and Sediment Control	Erosion and sediment controls must be implemented before and during works to prevent water pollution, consistent with the Blue Book.	Prevent water pollution and sediment runoff during construction.	No uncontrolled discharges; erosion controls maintained.	Site Supervisor	Erosion and Sediment Control Plan (ESCP); daily inspection logs; rainfall-event inspections.
CoA D34 – Land Use Survey	Undertake a detailed land-use survey to confirm sensitive receivers prior to noisy works.	Identify and confirm all sensitive receivers prior to commencement of noisy works.	Land-use survey completed prior to works impacting sensitive receivers.	Acoustic Advisor / Environmental Manager	Noise and Vibration CEMP Sub-plan; Land Use Survey report.



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CoA D35 – Construction Hours	Limit construction activities to approved standard hours unless otherwise approved.	Ensure compliance with approved construction hours.	100 % compliance with approved hours (unless OOHW approval granted).	Site Supervisor	Site rosters; work permits; AA/ER notifications.
CoA D39–D43 – Noise / Vibration Limits & DNVIS	Manage noise and vibration to meet guideline levels and prepare DNVIS for works with predicted exceedances.	Minimise noise and vibration impacts; prepare DNVIS where required.	No unapproved exceedances; mitigation applied where triggers are met.	Acoustic Advisor / Environmental Manager	Noise and Vibration CEMP Sub-plan; monitoring reports; DNVIS.
CoA D111–D114 – Waste Hierarchy & Tracking	Manage waste in accordance with the hierarchy (avoid, reuse/recycle, treat/dispose) and ensure lawful disposal with records retained.	Apply the waste hierarchy and ensure lawful disposal of all waste.	100 % of waste classified and disposed at licensed facilities.	Site Supervisor / Environmental Manager	Waste register; dockets; EPA classifications; WRAPP reports.
CoA D13, D24, D31–D33 – Unexpected Finds	Prepare and implement Unexpected Finds and Human Remains Procedures and stop work until clearance provided.	Protect Aboriginal and non-Aboriginal heritage and respond to unexpected finds appropriately.	All finds managed under Unexpected Finds Procedure; no unauthorised impacts.	Site Supervisor / Environmental Manager	Unexpected Finds Procedure; incident reports; RAP/regulator notifications.
CoA D77–D78 – Contaminated Land & Asbestos	Prepare and implement an Unexpected Contaminated Land and Asbestos Finds Procedure throughout construction.	Manage unexpected contamination and asbestos safely.	No uncontrolled exposure; all finds managed per procedure.	Site Supervisor / Environmental Manager	Unexpected Contamination Procedure; waste dockets; consultant clearance.
Air Quality (CoA – AQ)	Implement all practicable measures to minimise dust and air-pollutant emissions during construction.	Minimise dust and air emissions.	No visible dust leaving site; complaints responded to within 24 hours.	Site Supervisor	Daily site inspection logs; complaints register; OCCS notifications.
Flora & Fauna (C11; D2, D9, LV13)	Minimise clearing, protect fauna, and replace trees to achieve a 2:1 ratio of new plantings.	Protect flora/fauna and achieve tree-replacement commitments.	Tree-protection zones installed; net increase of trees achieved 2:1.	Environmental Manager	Tree Protection Procedure; arborist reports; planting records.
Community Engagement (CEMF 4 & OCCS)	Implement the Overarching Community Communication Strategy and maintain transparent stakeholder engagement.	Maintain transparent, responsive engagement with stakeholders.	All notifications delivered ≥ 7 days prior; complaints acknowledged within 24 hrs.	Stakeholder & Community Manager	OCCS; complaints register; notification letters; monthly reports to Sydney Metro.
Sustainability / Resource Efficiency (CEMF 12)	Implement sustainability initiatives to minimise resource use, reduce waste, and report performance.	Maximise efficient use of resources and reduce waste.	Recycling/reuse ≥ 80 % of non-hazardous construction waste.	Environmental Manager	Monthly sustainability reports; WRAPP reports; waste dockets.

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Appendix E – Environmental Hold Points Register

A register of environmental hold points, identifying required controls or approvals prior to commencement of specific activities.

Table 24: Hold Point Register

Activity / Trigger	Hold Point Requirement	Approval / Clearance Required From	Evidence Required	Responsibility
Vegetation clearing or tree removal	Pre-clearing inspection to be undertaken by Environmental Manager and qualified ecologist; Tree Protection Zones installed.	Environmental Manager (with ecologist sign-off); Sydney Metro (if required).	Pre-clearing inspection checklist; Tree Protection Procedure records; signed release of hold point.	Site Supervisor / Environmental Manager
Commencement of ground disturbance (excavation, trenching, joint bay works)	ECM and erosion/sediment controls in place and approved.	Environmental Manager	Approved Environmental Control Map (Appendix C); daily inspection log confirming controls in place.	Site Supervisor
Discharge of water from site (dewatering, stormwater release)	Water quality testing undertaken; results within licence/approval limits; Environmental Manager authorisation.	Environmental Manager	Water quality test results; signed release of hold point.	Site Supervisor
Use of vibration-intensive equipment near heritage-listed structures	Vibration monitoring plan implemented; baseline condition survey completed; vibration monitoring equipment installed.	Heritage specialist / Acoustic Advisor / Environmental Manager	Condition survey report; monitoring records; AA/ER clearance (if applicable).	Environmental Manager
Commencement of noise-intensive activities (saw cutting, concrete removal, piling if applicable)	Land Use Survey completed; sensitive receivers identified; CNVMP and DNVIS (if required) approved.	Acoustic Advisor / Environmental Manager	Survey report; CNVMP/DNVIS approval record; community notifications.	Environmental Manager
Handling, movement or disposal of spoil	Spoil classification completed; approved reuse/disposal site identified.	Environmental Manager	Classification report; EPA waste codes; disposal docket or reuse confirmation.	Site Supervisor / Environmental Manager
Encountering unexpected finds (heritage or contamination)	Works must stop until assessment is completed; clearance given by specialist/regulator.	Environmental Manager; Heritage Specialist; Contamination Consultant; RAP (where relevant)	Unexpected Finds Procedure records; specialist clearance reports; regulator correspondence.	Site Supervisor
Concrete washout setup	Bunded washout pit established away from drains, inspected and approved prior to use.	Environmental Manager	Washout inspection record; photo evidence.	Site Supervisor
Fuel/chemical storage setup	Bunded and labelled storage area established with spill kits on site.	Environmental Manager	Site inspection checklist; spill kit inventory.	Site Supervisor



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Appendix F – No longer required

Table 25: Consultation Record Register
REMOVED – No longer required

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Appendix G – Approvals, Permits and Licences Register

A register of all environmental approvals, permits, licences, and consents required for the works, with status, conditions, and expiry dates.

Table 26: Approval, Permits and Licences Register

Approval / Permit / Licence	Legislation / Source	Applicability to Project	Responsible Party	Status	Reference / Evidence	Key Conditions / Notes
Conditions of Approval (CoA) – Sydney Metro West Stage 1	Environmental Planning and Assessment Act 1979 (NSW)	Applies to all works under the CSSI Stage 1 approval	Sydney Metro (Proponent)	Applicable	CoA Schedule A–E	Addressed throughout CEMP (Appendix A provides matrix)
Construction Environmental Management Framework (CEMF)	Condition of Approval A1	Framework sets obligations for contractors	Sydney Metro / Syscon	Applicable	Sydney Metro CEMF	Requirements integrated into CEMP Sections 3 & 9
Environment Protection Licence (EPL)	Protection of the Environment Operations Act 1997	Not required for this scope (surveying, kiosk works, trenching).	Syscon	Not applicable	–	If activities expand to scheduled premises, new EPL application may be required
Road Occupancy Licence (ROL)	Roads Act 1993 (NSW)	Required for temporary occupation of road reserves, traffic management during trenching and kiosk installation	Syscon (with TfNSW / Council)	To be obtained prior to road works	TfNSW / Council application forms	Conditions included in CTMP.
Section 68 Approval (Local Government Act)	Local Government Act 1993 (NSW)	May be required for works affecting stormwater, kerb & gutter connections	Syscon (with Council)	Not yet triggered	Council correspondence	To be confirmed during detailed design
Tree Removal / Pruning Permit	Local Government Act 1993 / Council Tree Preservation Order	May be required for trimming / removal of mature trees	Syscon (with Council)	If triggered	Tree Protection Procedure (Appendix K)	Aligns with Flora & Fauna Management requirements (CEMP Sec. 9.7)
Notification of Notifiable Works (asbestos)	Work Health and Safety Regulation 2017 (NSW)	If asbestos unexpectedly encountered during excavation	Syscon	Contingency only	Unexpected Contaminated Land and Asbestos Finds Procedure (Appendix R)	Must notify SafeWork NSW immediately if asbestos identified



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Appendix H – Incident and Complaints Registers

Registers used for environmental incidents and community complaints, including corrective actions and close-out status. NOTE: These registers are for Syscon's internal use. All reporting must also go through Sydney Metro West's reporting procedures.

Table 27: Incident Register

Date / Time	Location	Description of Incident	Category (Pollution / Safety / Heritage / Other)	Immediate Action Taken	Regulatory Notifications	Corrective / Preventative Actions	Responsible Person	Close-out Date	Evidence / Reference

Table 28: Complaints Register

Date / Time	Complainant (Name / Address / Contact)	Nature of Complaint	Work Area / Activity	Response Time (verbal within 2 hrs / written within 7 days)	Action Taken	Outcome / Close-out	Responsible Person	Evidence / Reference

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Appendix I – Training and Induction Records

Copies of or reference to environmental induction material and records of personnel training in environmental procedures, including toolbox talks.

Table 29: Training and Induction Records Register

Name	Date	Type	Attendees	Additional Details
		<i>Eg. Induction</i>		

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Appendix J – Audit and Inspection Reports

Copies of or reference to internal and external audit reports, weekly environmental inspection reports, and corrective action close-out records.

Table 30: Audit and Inspection Records Register

Record	Description

Appendix K – Tree Protection Procedure

1. Purpose

This procedure sets out the step-by-step requirements for protecting trees and associated vegetation during construction in accordance with:

- AS 4970:2009 Protection of Trees on Development Sites
- CoAs C11, D2, D9, LV11, LV12, LV13, and C-B8

2. Scope

Applies to all works within and adjacent to the construction site where trees are retained, trimmed, or removed. Covers pre-construction, during work, and post-construction reinstatement.

3. Responsibilities

- Project Manager – ensures compliance with this procedure and allocates resources.
- Environmental Manager – ensures controls are installed, inspected and maintained.
- Site Supervisors – ensure workers follow exclusion zones and tree protection requirements.
- Arborist / Ecologist – provides specialist input for trimming, clearing, or fauna relocation.

4. Step-by-Step Procedure

4.1 Pre-Construction

1. Identify trees to be retained, trimmed, or removed from design drawings and photos from site visit. Trees and shrubs that may be impacted during works have been identified below during. Some trimming of shrubs and bushes may be required. Exact details will be determined in consultation with residents and in compliance with this tree protection procedure.
2. Engage an AQF Level 5 Arborist where required, to assess health and prepare tree protection plan. Community consultation may be used for small shrubs and bushes that require trimming, without the need to engage an arborist.
3. Where required, establish Tree Protection Zones (TPZs):
 - Radius = DBH × 12 (as per AS 4970), adjusted to site constraints.
 - Install fencing at TPZ boundary, 1.8 m high, lockable gates for authorised access.
 - **Mark fencing with "Tree Protection Zone – No Entry" signage.**
4. Install ground protection where vehicles or plant must pass within the TPZ (e.g. geotextile + gravel or bog mats).
5. Include TPZ maps in site induction and toolbox talks.



4.2 During Construction

1. No storage, excavation, fuel handling, or stockpiling within TPZs.
2. If minor encroachment into TPZ is unavoidable, obtain Arborist approval and record mitigation (e.g. hand digging, root pruning with sharp tools).
3. Trimming of branches or roots only under Arborist supervision, using clean and sharp tools.
4. Where fauna habitat is identified (e.g. microbat roosts), engage an Ecologist to manage relocation.
5. Watering of retained trees during dry conditions (weekly or as directed by Arborist).
6. Daily supervisor checks of fencing and ground protection.

4.3 Post-Construction / Demobilisation

1. Arborist to re-inspect retained trees and record condition (where applicable).
2. Remove fencing only after approval from Environmental Manager.
3. Replace trees removed with new plantings at a minimum 2:1 ratio in consultation with Sydney Metro and Council.
4. Provide records of tree removal, canopy area loss, and replacement plantings to Sydney Metro.

5. Monitoring and Reporting

- Daily site supervisor checks of TPZ fencing and signage.
- Weekly Environmental Manager inspections, with corrective actions logged.
- Arborist inspection reports (pre-works, during works if encroachments, and post-works).
- Non-compliances to be reported to Sydney Metro and managed under the CEMP incident procedure.

6. Records

- TPZ layout maps
- Arborist assessments and instructions
- Fauna relocation records
- Tree removal register (species, size, location, canopy area)
- Tree replacement register

Figure TPZ1: Trees and shrubs within work zones







Figure: Beronga St





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Appendix L – CNVMP

See *Sydney Metro West – EWNS - Construction Noise and Vibration Management Plan (CNVMP)* – available as external document.

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Appendix M – DNVIS

See *Sydney Metro West – EWNS – Detailed Construction Noise and Vibration Impact Statement (DNVIS)* – available as external document.

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Appendix N – Overarching Communication Strategy (OCCS)

See Overarching Community Communication Strategy (OCCS) – appended to this plan.

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Overarching Community Communications Strategy (OCCS)

OFFICIAL			
Project:	Sydney Metro	Date:	5 September 2025
Group:	Customer, Operations and Outcomes	Status:	FINAL
Author:	Project Communications	Revision:	6
Company:	Sydney Metro	File number:	
File name:	Overarching Community Communication Strategy (OCCS)		

Unclassified

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1. Introduction

1.1. Sydney Metro

Sydney's new world-scale metro system is the biggest program of public transport infrastructure currently under construction in Australia and the largest urban rail infrastructure investment in the nation's history.

A key part of delivering the NSW Government's Future Transport 2056 priorities, this customer-focused fully accessible metro service will help grow the state's economy and help create vibrant places and communities. Sydney Metro has responsibility for delivering great places around metro stations so that precincts are designed, developed, activated, and managed in line with the metro system to ensure the best outcomes for customers and communities.

Sydney Metro works collaboratively and in partnership with the Australian Government to deliver Sydney Metro – Western Sydney Airport which is being jointly funded by the State and Federal Governments.

1.2. Transforming Sydney

Sydney Metro is transforming Sydney, cutting travel times, reducing congestion and making it easier and faster to get around Australia's biggest city.

This new world-class mass transit system will evolve with the city it will serve for generations to come. Metro rail will catalyse development in Greater Western Sydney and serve as the transport spine for new communities.

Global Sydney's population will pass 6 million by 2036; an extra 1.7 million people will progressively move into to Australia's biggest city, which will support an extra 840,000 jobs and 680,000 homes.

Sydney Metro will help boost economic productivity by bringing new jobs and new educational opportunities closer to home.

Designed with customers at its centre, stations will be quick and easy to get in and out of, trains will be fast, safe, and reliable, and technology will keep customers connected at every step of the journey.

Sydney Metro will integrate with new communities and transform existing urban centres.

1.3. Future Transport

In October 2017, the NSW Government announced Future Transport 2056 – Transport for NSW's 40-year blueprint for the future of the NSW transport system.

To support the Greater Sydney Commission's Greater Sydney Region Plan, the new transport strategy aims to improve public transport so that – by 2056 – 70 per cent of people will live within 30 minutes of work, study, and entertainment.

Future Transport 2056 is a comprehensive strategy to ensure travel is more personal, integrated, accessible, safe, reliable, and sustainable.

There are three parts to the strategy: programs that are committed to or funded by the NSW Government over the next 10 years; those that are under investigation; and visionary projects in the 20 year-plus timeframe that are being identified now for future consideration as the population grows.

More information about Future Transport 2056 is available at: future.transport.nsw.gov.au.

1.4. Sydney Metro values

At Sydney Metro our vision and values guide us in our interactions with each other, our stakeholders, and our partners.

Our Vision is “Transforming Sydney with a world class metro”, and our Mission is to deliver Sydney a connected metro service: providing more choice to customers and opportunities for our communities now and in the future.

Culture is a critical enabler of an organisation’s success. To help develop a strong organisational culture, Sydney Metro has established a set of values that guides its approach to the procurement and delivery of Sydney Metro. These values are:



Figure 1: Sydney Metro Core Values

Sydney Metro has an expectation that contractors will adhere and uphold these values in their dealings with Sydney Metro, other contractors, and stakeholders. Our values support us working together to achieve agreed outcomes supporting the delivery of our projects across our many diverse communities.

Sydney Metro has programs and initiatives in place to embed these values and recognise individuals and teams for consistently demonstrating them.

1.5. Sydney Metro community and stakeholder engagement

Sydney Metro creates successful engagement outcomes by working closely and cooperatively with the community, Federal, State, and local government, contractors, advisors, other service providers and key stakeholders.

Sydney Metro has been working with stakeholders and communities every step of the way since 2011, adapting to community needs and refining our approach to delivering community and stakeholder engagement to achieve better outcomes.

Key to the ongoing success of our engagement program has been a commitment to building personal relationships through face-to-face and digital engagement, supported by effective action and collaboration within multidisciplinary project teams.

Sydney Metro understands that the community and stakeholders want to communicate and access information in ways that are convenient and accessible. Our communication approach continues to evolve to ensure our diverse communities have access to a variety of platforms

that ensure a personalised approach to community engagement. Sydney Metro will continue to monitor the communication landscape to provide best practice solutions to engagement.

1.6. Our neighbours

New metro stations are a catalyst for development, regeneration, and renewal of neighbourhoods, bringing to life placemaking opportunities. It can be exciting to watch the metro station and local precinct come to life, but we also know that communities located immediately near construction sites will be more likely to notice construction works and associated impacts and may potentially find the cumulative changes happening in their local area difficult to comprehend.

Sydney Metro's communication and engagement approach places particular emphasis on these communities whether they are residents, businesses, schools and childcare centres, or places of worship.

Sydney Metro has extensive experience working with a range of businesses located near our construction sites, and we ensure that tailored communication solutions are provided. Our approach ensures businesses are provided with engagement solutions for their type of business, operational hours of work and size of the organisation.

1.7. A new project delivery landscape

Sydney is growing and the NSW Government is delivering projects to reduce traffic congestion and improve public transport.

Sydney Metro is committed to working closely with other nearby projects, local councils, Federal and State Government agencies, and our stakeholders to manage and coordinate construction activities and traffic to help minimise impacts on the community.

Sydney Metro works with other nearby projects to enable close coordination of communication, sharing of information to streamline engagement, and assist the community to understand projects more holistically in their area.

1.8. Fostering strong relationships throughout the project lifecycle

Sydney Metro works with the community and its stakeholders throughout project development, planning, and project delivery. At all stages of this project lifecycle, Sydney Metro ensures engagement is open and transparent ensuring goodwill is established and strong relationships formed.

Sydney Metro will work with its delivery partners to ensure project commitments and community and stakeholder needs established during the planning phases are continued and considered during the delivery phase.

1.9. Statutory planning context

The delivery of the Sydney Metro network is predominately considered State significant infrastructure (SSI) projects under Division 5.2 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) requiring preparation and public exhibition of an Environmental Impact Statement and approval from the Minister for Planning and Public Spaces.

In addition to approval under the EP&A Act, some Sydney Metro projects may also require assessment and approval under Commonwealth legislation, such as the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). Specifically, Sydney Metro Western Sydney Airport also requires approval under the Commonwealth *Airports Act 1996* (Airports Act) for all works located within the footprint of Western Sydney International (Nancy Bird-Walton) Airport.

Sydney Metro projects associated with the delivery of over and/or adjacent station developments are generally subject to assessment and approval as State significant development (SSD) in accordance with Division 4.7 of the EP&A Act.

This Overarching Community Communication Strategy (OCCS) and the commitments provided within this strategy are intended to form part of any relevant planning approval for Sydney Metro projects. Following the approval of projects, contractor-specific community communication strategies and other communication action plans as required will be prepared by the project delivery communication team and approved by Sydney Metro in accordance with this overarching strategy and any relevant project-specific conditions of approval.

1.10. Over and/or adjacent station development

All Sydney Metro stations are being designed to integrate with their surrounding areas to make vibrant and attractive places that reflect the unique context and future aspirations for each place.

Several stations are planned to include over and/or adjacent station developments, comprising of new buildings above and/or around the station that could deliver a range of uses – such as community facilities, new homes and green spaces, shops, restaurants, and commercial office spaces.

Sydney Metro will continue to work closely with the local community and stakeholders to ensure that the station precincts are welcoming hubs that build on the local character.

Over and/or adjacent station development will be subject to separate planning approval processes, which will include community and stakeholder engagement in line with this OCCS and any statutory requirements of a State Significant Development.

2. About this plan

The Overarching Community Communication Strategy (OCCS) has been prepared to guide Sydney Metro's approach to stakeholder and community liaison including engagement with communities, stakeholders, and businesses. This plan is intended to be used as a framework for community engagement across all Sydney Metro projects and contracts.

The OCCS considers all work activities and packages for Sydney Metro and its projects for the duration of work, and 12 months following the completion of construction.

Sydney Metro is responsible for the development and implementation of the OCCS to ensure there is a coordinated approach to stakeholder, business, and community liaison across the entire program of work for Sydney Metro.

Contract specific Community Communications Plans (CCP) will be developed by appointed (project delivery communication teams) to address contract and site specific needs of the community, stakeholders and businesses. These strategies will reflect the requirements of the OCCS (this plan) and they will adhere to the requirements outlined in the relevant contract General Specification – Stakeholder and Community Engagement, along with requirements identified in any relevant planning approval and/or environmental protection licence. For Sydney Metro – Western Sydney Airport all CCPs must comply with the Airport Plan (Western Sydney Airport).

The OCCS and CCPs are supported by a Construction Complaints Management System (CCMS) which outlines the framework for managing complaints, enquiries and escalation processes throughout the project lifecycle. The CCMS also outlines the process for reporting complaints.

Small Business Owners Engagement Plans (SBOEPs) will support these strategies.

CCP and SBOEP drafts must be prepared in accordance with Table 4 and submitted to Sydney Metro for review 30 days prior to the start of construction. Full CCP and SBOEP approval by Sydney Metro is required prior to contractor activities.

The CCPs must be informed by engagement with directly affected communities and stakeholders and must support implementation of the project and/or planning approval specific Community Benefits Plan.



Figure 2: Communication strategy hierarchy

The communication strategy hierarchy is supported by plans and procedures in the Sydney Metro Integrated Management System - Communication and Engagement, which outlines Sydney Metro's approach to stakeholder management, public affairs, public communication, and strategic partnerships.

2.1. Accountabilities

The Executive Director Communication and Engagement, or delegate, is accountable for this document. Accountability includes authorising the document, monitoring its effectiveness, and performing a formal document review.

Members of the team including Sydney Metro staff, contractors, subcontractors, and consultants are accountable for ensuring the requirements of this plan are implemented within their area of responsibility. This document will be reviewed and reissued annually.

2.2. Purpose

This OCCS will guide Sydney Metro's interactions with stakeholders and the community and will outline the:

- approach, objectives, principals, and tools to be used
- team structure, roles, and responsibilities
- communication protocols and procedures to be followed
- key stakeholders
- approach to low impact works or preparatory activities
- approach to reporting and evaluation.

The commitments provided in this plan are intended to form part of, and satisfy the obligations of, any relevant planning approval for Sydney Metro projects.

2.3. Communication and engagement approach

Sydney Metro is committed to establishing genuine relationships with stakeholders and the community. This is underpinned by the belief that effective communication is a crucial element in the successful delivery of all our projects.

Sydney Metro recognises the diverse engagement and information needs of the community and stakeholders and commits to robust and transparent engagement processes that are inclusive in nature.

The Engagement Institute (formerly International Association for Public Participation [IAP2]) is used to guide engagement during different project phases with an emphasis on 'inform', 'consult' and 'active participation' levels as appropriate. The levels of consultation outlined in the spectrum are provided as a guide only, and the Project team will ensure an individual approach is taken when engaging with each stakeholder.

The spectrum found at **engagementinstitute.org.au** may be considered in engagement with members of the community, stakeholders including Government agencies, members of parliament and public sector stakeholders.

2.4. Place managers

Sydney Metro ensures a personal approach when undertaking community engagement by having dedicated community relations specialists called place managers. Their role is to act as a single, direct contact between members of the community and the project team.

Sydney Metro also has personal managers to provide support throughout any property acquisition process. Their role is to work closely with property owners and/or tenants to make sure the process is as easy as possible.

2.5. Objectives

Sydney Metro's corporate strategic objectives are:

- Manage customer and community expectations.
- Integration of 'place'.
- Record infrastructure investment.
- Technological change.
- Drive towards long-term financial sustainability.

The Sydney Metro project communication and engagement objectives are to:

- Minimise project impacts on stakeholders and the community where possible.
- Minimise project impacts on local businesses recognising specific needs and requirements.
- Provide adequate, timely and coordinated stakeholder and community communication and engagement.
- Assist stakeholders and the community in their understanding of project construction including activities to be undertaken by project delivery partners and their objectives, benefits, potential impacts and expected outcomes.
- Appropriately address stakeholder and community issues.
- Provide consistency across our external communication activities and interfaces with stakeholders during delivery of all Sydney Metro projects.
- Coordinate approach to manage project enquiries and complaints with interface projects where appropriate.
- Act as a conduit and advocate between the project team and the broader community.

2.6. Roles and responsibilities

Figure 4 below demonstrates engagement throughout the project lifecycle. Sydney Metro will begin engaging with the community and stakeholders in the early strategic planning stages of the project and will continue this relationship through to operational readiness, and operation of metro services. Once metro is operational, some of these community members and stakeholders will become customers of Sydney Metro.

The project lifecycle can involve several project phases occurring concurrently. Understanding this assists Sydney Metro and the project delivery communication team(s) to work together to ensure communication is clear and consistent across the different facets of the project.

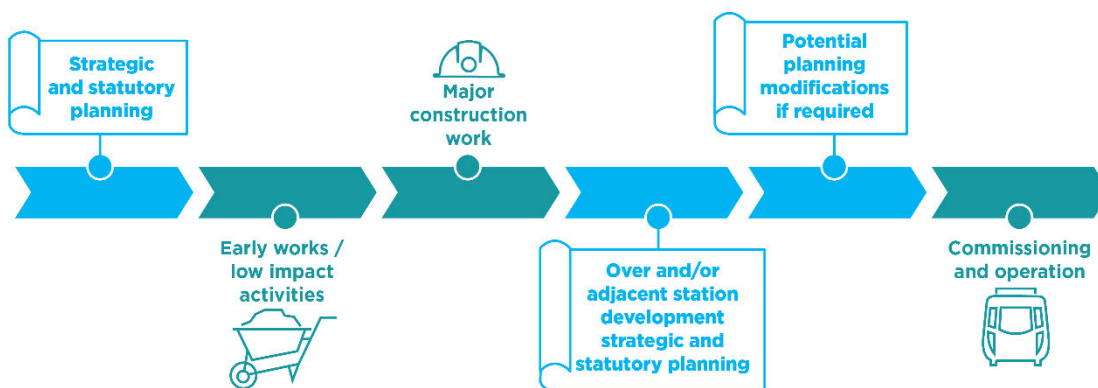


Figure 4: Potential stakeholder and community engagement touchpoints through the project lifecycle.

Figure 5 below outlines key responsibilities of Sydney Metro, and the project delivery communication teams during project planning and delivery. Figure 5 is intended as a guide, noting there would be times when responsibilities would overlap particularly in the pre-construction phase and in the transition between statutory planning and construction communication. The full suite of delivery partner responsibilities for the project delivery communication team will be outlined in the contract General Specification – Stakeholder and Community Engagement.

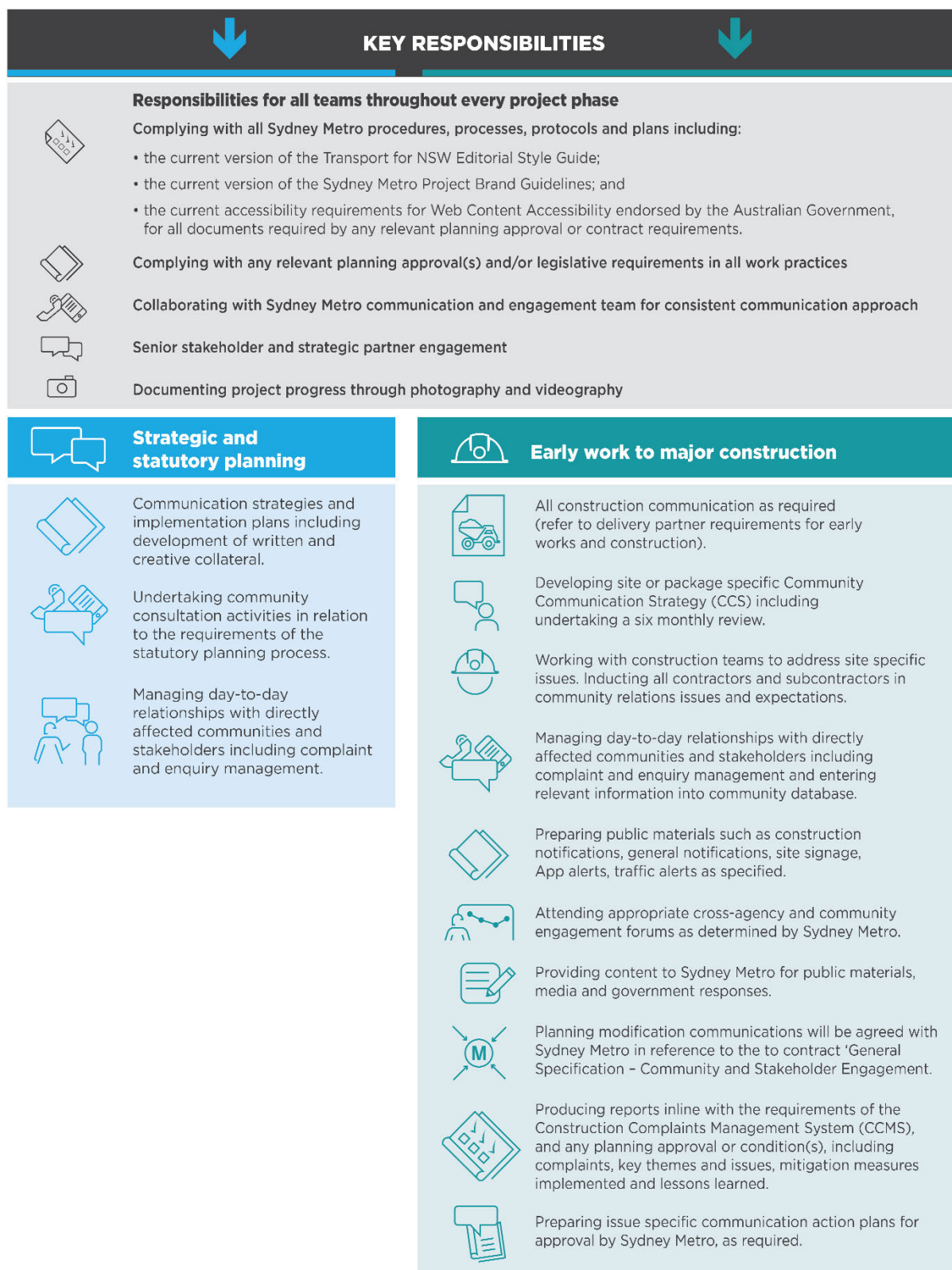


Figure 5: Responsibilities during planning and construction

Table 1: Roles and responsibilities in the planning and delivery phases of the project.

Role	Responsibility
Environmental Representative	<p>A suitably qualified and experienced Environmental Representative is independent of the design and construction personnel and responsible for advising the Department of Planning, Housing and Infrastructure on the environmental performance of projects. The Environmental Representative is engaged by Sydney Metro for the duration of construction of the project and approved by the Secretary of the Department of Planning, Housing and Infrastructure.</p> <p>The Environmental Representative may provide advice to the Sydney Metro Communication and Engagement team in relation to environmental performance and mitigation measures.</p> <p>Provide an independent review to help resolve complaints about construction issues where a resolution has been unable to be reached by the project delivery communication team and the Sydney Metro project team.</p>
Acoustic Advisor, if required according to planning approval	<p>A suitably qualified and experienced Acoustic Advisor is independent of the design and construction personnel and responsible for advising the Department of Planning, Housing and Infrastructure specifically on noise and vibration performance of the project. The Acoustic Advisor is engaged by Sydney Metro for the duration of construction of the project and approved by the Secretary of the Department of Planning, Housing and Infrastructure.</p> <p>The Acoustic Advisor may provide advice to the Sydney Metro Communication and Engagement team in relations to acoustic performance and mitigation measures.</p>
Independent property impact assessment panel, if required according to planning approval	<p>An independent panel may provide assistance in the resolution of property damage concerns following investigation by Sydney Metro and technical specialists in consultation with the affected property owner.</p>
Western Sydney Airport or Airport Environment Officer, if required according to planning approval	<p>Western Sydney Airport is the lessee of Western Sydney International (Nancy Bird-Walton) Airport and has responsibility for the site.</p> <p>An Airport Environment Officer is responsible for the day-to-day regulatory oversight of compliance with the Commonwealth <i>Airport (Environment Protection) Regulations 1997</i> (AEPRs) at Western Sydney International (Nancy Bird-Walton) Airport and will have a role in relation to works for Sydney Metro – Western Sydney Airport on this site.</p>
Other project technical specialists	<p>Provide subject matter technical expertise for the duration of construction, or as otherwise agreed by the Secretary of the Department of Planning, Housing and Infrastructure. This scope will include but not limited to: construction, noise, vibration, tunnelling and general project related issues.</p>
Independent mediation service(s) (engaged as required)	<p>Upon the recommendation of the Director, Project Communication, or the Environmental Representative, provide independent mediation to help resolve complaints about construction issues where a resolution has been unable to be reached by the project delivery communication team and/or the Sydney Metro project team.</p> <p>Any mediator engaged by Sydney Metro, to assist in resolving a complaint, would be required to hold suitable qualifications and have experience mediating similar matters.</p>

Executive Director Communication & Engagement	Overall responsibility for defining, developing, and implementing the strategic direction of Sydney Metro in respect of all communication and engagement activities.
Director Project Communications	Responsible and accountable for authorising all communication and engagement documents, monitoring their effectiveness, and performing formal document review.
Sydney Metro Communication and Engagement Team	<p>This team's key accountabilities and responsibilities include:</p> <ul style="list-style-type: none"> • communication and engagement • stakeholder management • public affairs • public communication • strategic partnerships • project communications.
Project Communication teams (Sydney Metro and project delivery communication team)	<ul style="list-style-type: none"> • Develop and/or implement this Overarching Community Communications Strategy. • Provide place managers to engage with the local community during the design, planning approval and early work/low impact/major construction activity stages. • Develop and implement project communication plans, including all CCPs, SBOEP and any specific communication action plans for review and approval by Sydney Metro. • Develop external facing project communication collateral • Proactively identify potential issues and work cooperatively to develop agreed management strategies.

2.7. Roles and responsibilities for complaint management during construction

The CCMS will outline the framework for managing complaints, enquiries, unreasonable conduct by complainants and escalation processes throughout the project lifecycle.

Complaints are first managed by the project delivery communication team and any unresolved complaints may then be escalated to Sydney Metro.

The Director, Project Communications is the designated complaints handling management representative for the escalation of complaints for independent review. Complaints would only be escalated for independent review following a full and thorough investigation by the project delivery communication team and Sydney Metro. The Director, Project Communication may also refer a complaint to independent mediation at any stage in the complaint management process.

Following any escalation for independent review, the Environmental Representative would make an assessment on the adequacy of Sydney Metro's response to the complaint in

accordance with this plan, the CCMS and the project's planning and assessment process, in consideration of what is fair and reasonable.

Following this review the Environmental Representative would either make a recommendation to close the complaint and notify the Secretary or provide recommendations for consideration by Sydney Metro on any additional actions that could be undertaken to assist in resolving the complaint.

The Environmental Representative may also refer any reasonable and unresolved complaint for independent mediation, at which time a qualified mediator would be engaged by the project. This process is outlined in figure 6.

This process does not apply to complaints specifically relating to the Western Sydney International Airport site which would be managed and escalated to Western Sydney Airport in accordance with the CCMS.

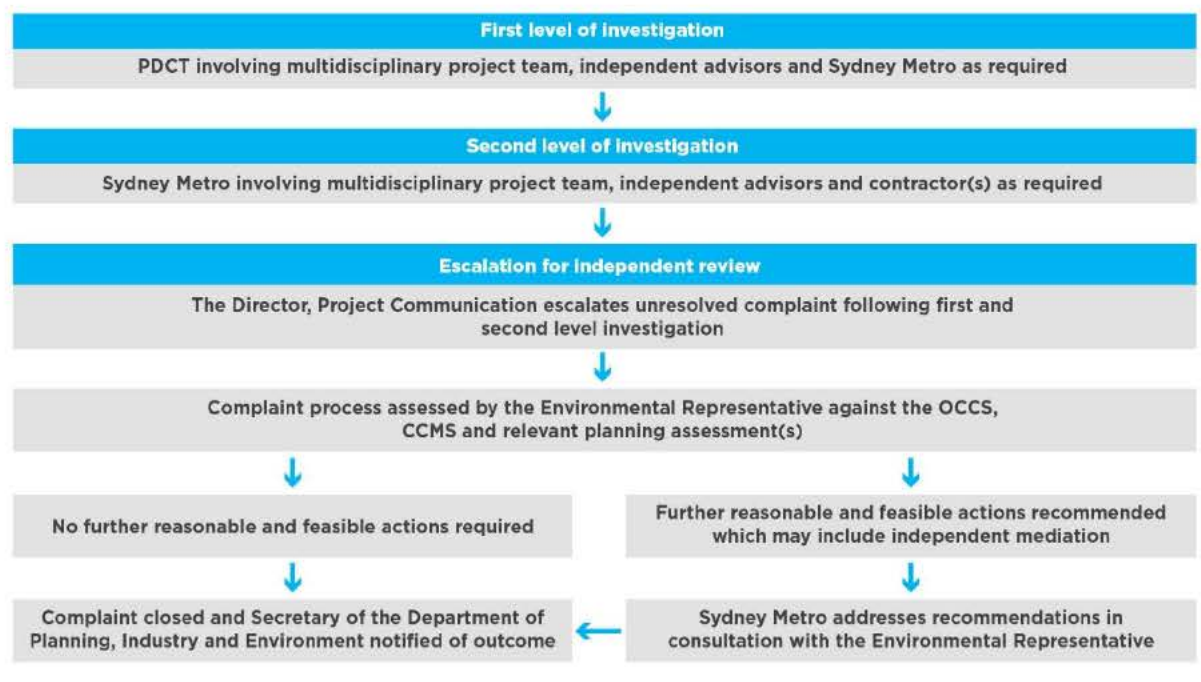


Figure 6: complaint escalation process for Sydney Metro

Sydney Metro's process for managing, determining, and minimising unreasonable conduct by complainants is outlined in the CCMS. The Director, Project Communications is responsible for determining if a complainant's conduct is considered unreasonable and for implementing communication approaches as appropriate.

3. Our stakeholders

3.1. Our relationships

Effective relationships and consistent and accountable communication practices are crucial to the successful delivery of Sydney Metro. Sydney Metro is committed to providing proactive and positive interactions with all our stakeholders during the delivery of our projects. Our stakeholders include:

- Colleagues across Transport for NSW.
- Local, state, and federal government departments and agencies.
- Media.
- Industry partners.
- Precinct partners and city deal partners.
- Broader network users and customers.
- The community across Sydney, including businesses.

Table 2: Sydney Metro stakeholders (as relevant to each Sydney Metro project)

Sector	Stakeholders
Community	Neighbours
	Residents and resident groups
	Businesses and business groups
	Property owners and tenants
	Business owners and tenants
	Landowners
	Interest groups Education and religious facilities
	Transport users
	Owners and managers of local social infrastructure and community facilities
	Peak community groups
Government	Multicultural support groups
	Federal Minister for Infrastructure, Transport Regional Development and Local Government
	Federal Minister for Cities
	Federal Minister for Communications

Sector	Stakeholders
	NSW Minister for Transport NSW Minister for Planning and Public Spaces NSW Minister for the Environment NSW Minister for Jobs and Tourism NSW Minister for Roads NSW Minister for Industry and Trade NSW Minister for Western Sydney
	State elected members and their electoral offices Local elected members Local council General Managers/CEOs
	Department of Primary Industries and Regional Development Department of Climate Change, Energy, the Environment and Water Western Sydney Airport
	Transport for NSW Department of Planning, Housing and Infrastructure Infrastructure NSW Investment NSW Placemaking NSW NSW Premier's Department NSW The Cabinet Office NSW Treasury Port Authority of NSW NSW Health NSW Department of Communities & Justice NSW Department of Education Schools Infrastructure NSW Western Sydney Planning Partnership Bradfield Development Authority
	Council officers Emergency services: <ul style="list-style-type: none"> • Police • Ambulance • NSW Fire and Rescue • Rural Fire Services • State Emergency Services

Sector	Stakeholders
Neighbouring projects	Parramatta Light Rail The Civic Link (Parramatta City Council) Powerhouse Parramatta Parramatta Square redevelopment Western Harbour Tunnel M4-M5 Link Rozelle Interchange Westmead redevelopment Glebe Island Multi-User facility Revitalisation of Blackwattle Bay and the new Fish Market Western Sydney International Airport M12 Motorway Sydney Metro City & Southwest Circular Quay Renewal
Service providers	Sydney Water Water NSW Power utilities Telecommunication providers Local Councils
Industry	Academic institutions Contractors Peak bodies Transport associations Transport experts Unions
Precinct partners	Local councils State government agencies Federal government agencies Government-owned corporations
Media	All media

4. Our communities

Sydney Metro recognises that our projects are undertaken across a range of diverse communities and our information needs to be accessible for all people. The project will continue to monitor, adapt, and review communication streams, key messages, and audiences to continue to connect with people in ways that are meaningful to them.

4.1. Community demographics

Sydney Metro uses area demographics and census data to better understand the communities in which we operate. The information we gather ensures we provide accessible information to people from all backgrounds including:

- People with languages other than English (LOTE)
- Culturally and linguistically diverse communities (CALD)
- Vulnerable and marginalised groups
- People with disabilities
- Aboriginal and Torres Strait Islander Communities (ATSI)
- Diverse communities.

The project delivery communication team CCPs must demonstrate how their communication approach will use tools and strategies that meet the needs of their diverse communities. Specific tools outlined in section 6 should be considered as appropriate, including the use of tools to build understanding within the construction teams.

4.2. Working with culturally and linguistically diverse (CALD) and languages other than English (LOTE) communities

The following processes and communication tools can be used to improve accessibility and outreach with people who come from CALD and LOTE backgrounds:

- Providing project information on the Sydney Metro website which can be translated into multiple languages.
- Working closely with local councils and community groups to utilise existing CALD relationships.
- Continued outreach with targeted CALD community groups, and face-to-face meetings and briefings with CALD communities as required.
- Advertising project milestones in foreign language newspapers.
- Translating project milestone factsheets and newsletters into targeted languages.
- Ensuring that foreign language submissions can be received.
- Providing translators for meetings and engagements as required.
- Sydney Metro Connect App with access to information in more than 100 languages.

4.3. Working with vulnerable and marginalised groups

Sydney Metro recognises that a range of community members may be vulnerable and marginalised groups in relation to disabilities and health, age, employment, and housing status, among other issues.

The following processes, communication tools and approaches would be used to improve accessibility and outreach with vulnerable and marginalised groups:

- Engage with relevant support organisations to keep vulnerable and marginalised groups informed of work occurring.
- Engage with communities through a range of plain English in person and digital communication methods to ensure inclusivity and accessibility.
- Staff responsible for engaging people with vulnerable and marginalised people or groups ensure inclusive and accessible community engagement, tailoring communications as required.

4.4. Working with people living with a disability

Sydney Metro will adopt the following approaches when engaging with people living with a disability.

- Recognise the important role that carers play in the lives of people living with a disability and providing the opportunity to involve a support person in conversations with the project, if necessary.
- Community members can also request communication adjustments such as audio, large text or translations to assist in meeting their needs.
- Working with stakeholders to make other reasonable adjustments as needed.

4.5. Working with Aboriginal and Torres Strait Islander (ATSI) communities

The following key focus areas have been developed by the Transport for NSW Reconciliation Action Plan (RAP), and will be reflected and incorporated in all engagement objectives and activities undertaken by Sydney Metro to:

- Build and strengthen relationships
- Respect and celebrate culture.

The following processes and communication tools can be used to improve accessibility and outreach with ATSI communities:

- Working collaboratively and respectfully with our Aboriginal and Torres Strait Islander staff, Aboriginal Peak Bodies, and with the communities in which we operate.

- Continue working with our key stakeholders to further build upon existing relationships and seek to invest in new partnerships to support our progress in delivering meaningful outcomes for Aboriginal and Torres Strait Islander peoples whilst delivering on our core business.

4.6. Working with diverse communities

Sydney Metro will continue to review its communication tools to ensure inclusive community engagement and the varied information requirements of our communities and stakeholders is prioritised.

The following processes and communication tools can be used to improve accessibility and outreach with diverse communities:

- Web and digital based engagement tools allowing people to engage with the project at a time that is convenient to them.
- Using multiple communication platforms to enhance communication reach, for example printed notifications, face-to-face doorknocks, email and Sydney Metro Connect.
- Ensuring communities are provided with convenient options to access the project team such as providing options for community information sessions and a 1800 number 24 hours a day, seven days a week.
- Harnessing a place management approach to understand the specific needs of communities and tailor communication accordingly.
- Working with community leaders/groups as relevant to ensure effective outreach to target cohorts.

4.7. Relevant plans and policies

All Sydney Metro communication materials will adhere to Web Content Accessibility Guidelines (WCAG 2.0).

Sydney Metro adheres to the principals and objectives outlined in the following plans and policies:

- Department of Communities & Justice [Protocol for Homeless People in Public Places](#) within all community communication strategies.
- The [NSW Government Disability Inclusion Action Plan 2020-2025](#)
- The [Transport for NSW Stretch Reconciliation Action Plan \(RAP\)](#) and the [Aboriginal Participation Strategy](#)
- The Department of Planning, Housing and Infrastructure [Social Impact Assessment Guideline](#)
- The [Transport for NSW Multicultural Plan 2021-2023](#)

5. Businesses

Sydney Metro works with local businesses within project catchments to ensure communication and engagement is tailored to their specific needs.

Sydney Metro's overarching approach to business engagement is to:

- Identify and document potentially impacted businesses prior to project commencement.
- Provide early advice to businesses of upcoming projects.
- Provide businesses with information about the project and its long terms benefits.
- Provide businesses with information about construction progress.
- Ensure businesses understand the scope of the works and mitigation measures contractors can provide.
- Ensure businesses understand the proposed timing of the works.
- Consult with businesses and take steps to minimise potential impacts, where reasonable.
- Ensure the project team understands the operational requirements and sensitivities of businesses around each site.

The project delivery communication team CCP must include at a minimum the identification and details of specific businesses located within 50 metres of each relevant construction site.

Project delivery communication teams may identify the specific needs of each business, any potential impacts associated with construction works, and proposed mitigation measures. These measures may also address if there is a need for translation or cultural and other specialists.

The project delivery communication team CCP may also outline the approach and timing of specific business engagement at each construction site.

Evaluation and monitoring of business engagement is outlined in section 11.

5.1. Small Business Owners Engagement Plans

The Sydney Metro project delivery communication team will provide assistance if required to small business owners located adjacent to Sydney Metro construction sites, where they may be potentially impacted by construction activities. For the purposes of this plan, a 'small business' is defined as a business that employs fewer than 20 people.

Sydney Metro activities to support eligible businesses may include:

- Small business education and mentoring
- Activation events
- Business engagement events
- Marketing and promotion.

A Small Business Owners Engagement Plan will be prepared by the Sydney Metro project delivery communication team in accordance with Table 4 prior to construction at relevant sites and must address any relevant conditions of planning approval.

6. Communication tools

Sydney Metro uses a range of communication and engagement tools to ensure project information reaches a wide variety of people likely to be impacted by the project. Using a variety of tools provides our communities with options to engage with the project in ways that suit their needs and lifestyle.

When planning communication strategies, the project delivery communication team must consider the requirements of the General Specification – Stakeholder and Community Engagement along with the specific needs of their community as identified in their CCP. The CCP should then outline the specific tools used to reach their identified stakeholders.

The following communication tools matrix is provided as a guide only and other communication tools may be used with prior approval from the Director, Project Communications. CALD communication tools are also included in the table below.

Sydney Metro will provide a suite of project specific templates to the project delivery communication team to assist in the development of communication collateral.

Table 3: Sydney Metro communication and engagement tools

Tool	Explanation and purpose	Responsibility
Community contact tools		
Community information line	Operational 24 hours a day and included on all public communication materials. Translation services are available for those with English as a second language.	Sydney Metro
Community email address	This allows stakeholders and the community to have access to the project teams and to provide feedback and ask questions. All communication materials and the website will include the community email address. During construction, emails will be redirected to relevant project delivery communication teams as required.	Sydney Metro
Community post box	All stakeholders can use the postal address: PO Box K659, Haymarket NSW 1240 for Sydney Metro enquires.	Sydney Metro
CALD Translation services	All communication will promote our translation services for those with English as a second language.	Sydney Metro

Tool	Explanation and purpose	Responsibility
Information tools		
Newsletters	<p>Printed and/or web accessible online site-specific newsletters (where works are ongoing) will include information on:</p> <ul style="list-style-type: none"> • construction progress • upcoming construction stages and milestones • environmental management achievements • community involvement achievements • three month look-ahead • community contact information. <p>Newsletters will be distributed to local communities, stakeholders, and businesses up to 500m from the sites and be made available on the Sydney Metro website.</p>	Sydney Metro/project delivery communication team
Sydney Metro direct mail email updates	The community, stakeholders and businesses will be offered the opportunity to register to receive Sydney Metro milestone updates.	Sydney Metro
Construction email updates	The community, stakeholders and businesses will be offered the opportunity to register to receive construction updates.	Project delivery communication team
Fact sheets	Printed and/or web accessible fact sheets will be used as required to explain key aspects of Sydney Metro to the community and our stakeholders.	Project delivery communication team
Photography and videography	<p>Photos and videos will be used to record the construction process and assist with explaining aspects of Sydney Metro to stakeholders and the community.</p> <p>Images and footage will be used in notifications, newsletters, on the Sydney Metro website, presentations and reports as required.</p>	Sydney Metro/project delivery communication team
Information videos	Information videos can be used to highlight key project milestones, construction information or elements of the statutory planning process.	Sydney Metro/project delivery communication team
Site signage and hoarding banners	Site signage and hoarding banners will identify Sydney Metro and provide contact information.	Sydney Metro/project delivery communication team
CALD Newsletters and fact sheets	Translating project milestone factsheets and newsletters into targeted languages where required.	Sydney Metro/project delivery communication team

Tool	Explanation and purpose	Responsibility
Online tools		
Sydney Metro website	<p>Information about the project will be uploaded to the Sydney Metro website.</p> <p>The website will be referenced in all communication materials as a source of information and will be updated on a regular basis. Information will include:</p> <ul style="list-style-type: none"> • description of the Sydney Metro • project information including: <ul style="list-style-type: none"> – description, status, and timing – newsletters – notifications – up-to-date project information – graphics and images on the project background and progress – copies of relevant reports – photos, images, and maps – links to documents as required under the relevant projects Conditions of Approval – a link to Sydney Metro contractor webpages. • contact information • email subscription service • the Sydney Metro website is translatable into more than 100 different languages using the Google translate function at the bottom of the home page. 	Sydney Metro
Project interactive portal	<p>Sydney Metro may establish and maintain an online portal for the project displaying key project information including:</p> <ul style="list-style-type: none"> • statutory planning information • project map(s) • graphics and images of the project • newsletters and other project information • specific project information displays • contact information. 	Sydney Metro
Contractor webpage	<p>Each contractor will establish and maintain a web site to upload and maintain information to be published. Including copies of community, environmental, sustainability, transport, traffic and noise and vibration reports and plans.</p> <p>A link will be provided to the Sydney Metro website.</p>	project delivery communication team
Social media	Facebook, X (formerly Twitter), LinkedIn and Instagram may be used to provide updates to stakeholders.	Sydney Metro

Tool	Explanation and purpose	Responsibility
	Stakeholders should be offered the opportunity to join social media feeds via public materials produced for Sydney Metro.	
CALD Sydney Metro and Contractor website	Updating the Sydney Metro website with project information, which can be translated into more than 100 different languages. Ensuring that foreign language submissions can be received.	Sydney Metro/project delivery communication team
Sydney Metro Connect App	May be used to provide information about upcoming events and project updates.	Sydney Metro
Face-to-face and interactive tools		
Mobile information displays	Mobile information displays can be used at locations like community events, shopping centres and local public spaces to provide information about Sydney Metro, statutory planning processes or construction.	Sydney Metro/project delivery communication team
Virtual information rooms	Virtual information displays can be used to highlight project milestones, provide information about construction or statutory planning processes.	Sydney Metro/project delivery communication team
Door knock meetings	Individual door knock meetings will be used as required to discuss potential impacts of Sydney Metro with highly impacted stakeholders, especially residents, businesses directly neighbouring construction sites and owners or managers of nearby social infrastructure or community facilities.	Sydney Metro/project delivery communication team
In person and/or virtual meetings with individuals or groups	Stakeholder meetings will be used as required to discuss Sydney Metro activities including work in progress and upcoming work or any issues in connection with the activities.	Sydney Metro/project delivery communication team
Site visits	Site visits will be used where appropriate to inform select stakeholders about the progress of Sydney Metro and any key milestones or activities taking place.	Sydney Metro/project delivery communication team
Mobile community information centre	The mobile community information centre provides a flexible approach to community engagement, providing a modern take on a shopfront community information centre 'on wheels', bringing information directly into local communities.	Sydney Metro
Sydney Metro 'The Game'	Sydney Metro 'The Game' gives users a firsthand experience of the Sydney Metro end-product as they explore a future Sydney Metro station and precinct, collecting project knowledge tokens along the way that showcases the benefits of the project.	Sydney Metro

Tool	Explanation and purpose	Responsibility
In person and/or virtual presentations and forums	Presentations and forums will be used where appropriate to inform stakeholders about the progress of Sydney Metro and any key milestones or activities taking place.	Sydney Metro/project delivery communication team
In person and/or community and business based forums	Forums will be used to focus on key environmental management issues relating to construction activities with impacted community and business stakeholders.	Sydney Metro/project delivery communication team
CALD In person and/or virtual tools	<p>Providing translators for virtual and/or in person meetings and engagements as required.</p> <p>Working closely with local councils and community groups to utilise existing CALD community relationships.</p> <p>Continued outreach with targeted CALD community groups, and virtual and/or face-to-face meetings and briefings with CALD communities as required.</p>	Sydney Metro/project delivery communication team
CALD Presentations	Presentations will also be offered to local CALD community groups in multiple languages by bi-lingual team members or external translators.	Sydney Metro/project delivery communication team
Community and/or stakeholder surveys	Surveys will be used as required to understand community needs and concerns to inform further engagement and mitigation measures	Sydney Metro/project delivery communication team
Notifications		
Emergency works – notification letter	<p>An emergency works* notification letter will be used to advise properties immediately adjacent to, or impacted by emergency works, within two hours of commencing work.</p> <p>Notifications must be delivered by the project delivery communication team, issued on Sydney Metro letterhead, and include the following:</p> <ul style="list-style-type: none"> • scope of work • location of work • hours of work • duration of activity • type of equipment to be used • likely impacts including noise, vibration, traffic, access, and dust • mitigation measures • contact information. 	Project delivery communication team

Tool	Explanation and purpose	Responsibility
	<i>*Work required to repair damaged utilities and/or make an area safe after an incident outside standard construction hours.</i>	
7 day notification - Community Signage	<p>Signage will be erected at least 7 days prior to any activity with the potential to impact stakeholders or the community. This includes:</p> <ul style="list-style-type: none"> • work in public areas such as a park • making changes to pedestrian routes • impacting on cycle ways • changing traffic conditions • disrupting access to bus stops. <p>Signage could include A-frames, mobile Variable Message Sign (VMS), hoarding or similar and be placed at either end of the corridor of work.</p>	Project delivery communication team
7 day - Traffic alert email	<p>Traffic alert email will be sent at least 7 days prior to any works requiring changes to traffic. Recipients should include:</p> <ul style="list-style-type: none"> • relevant authorities • transport operators (including bus, coach, and taxi operators). <p>The notification audience and content will be guided by the Traffic and Transport Liaison Group and Traffic Management Plans.</p>	Project delivery communication team
7 day – utility notification	<p>A notification will be sent to relevant utility service authorities at least 7 days before utility service work, to provide detailed information for their relevant call centre messaging.</p>	Project delivery communication team
Notification letter	<p>Notification letters will be used to advise the community and stakeholders of any activity with the potential to cause impacts. The notification should be delivered at least 7 days prior to the activity occurring to an area of 100 metres around the construction site for day works and 200 metres around the site for night works.</p> <p>Wherever possible works notifications should be combined for the month to include all proposed site activities where works are ongoing. Follow up communication should be implemented for night works including the use of email, door knock or Sydney Metro Connect App reminders.</p> <p>Notifications are required for:</p> <ul style="list-style-type: none"> • start of construction • significant milestones • changes to scope of work • night works • changes to traffic conditions • modifications to pedestrian routes, cycleways, and bus stops 	Project delivery communication team

Tool	Explanation and purpose	Responsibility
	<ul style="list-style-type: none"> • out of hours work • changes to residential or business access • changes or disruptions to utility services • investigation activities. <p>Notifications will be issued on Sydney Metro letterhead and include the following:</p> <ul style="list-style-type: none"> • scope of work • location of work • hours of work • duration of activity • type of equipment to be used • likely impacts including noise, vibration, traffic, access, and dust • mitigation measures • contact information. 	
Advertisements	<p>Display advertisements may be used to notify the community prior to the start of construction, update on construction activity, notify of exhibitions and events and announce Sydney Metro and milestones.</p> <p>Advertisements may be used as required, to fulfil the requirements of any planning approval, or licences and that required by law.</p> <p>Advertisements in local newspapers, if possible (that cover the geographical areas of the contractor's activities) will be used to notify of significant traffic management changes, detours, traffic disruptions and work outside any working hours contained in the environmental documents at least 7 days before any detour, disruption or change occurs.</p>	Sydney Metro
Notification email	Email notifications via community engagement database distribution lists are utilised once on the ground notification distribution has been completed.	Sydney Metro/project delivery communication team
Sydney Metro Connect App	The Sydney Metro Connect App will be used to provide brief construction information updates to the community. Stakeholders will be offered the opportunity to sign up for 'App' updates via other communication channels.	Sydney Metro
CALD Advertisements	Advertising project milestones in foreign language newspapers.	Sydney Metro
Briefings and media		
MP, local elected members, and	MP, Local elected members, and Ministerial briefings will be used to update these stakeholders on major Sydney Metro milestones.	Sydney Metro

Tool	Explanation and purpose	Responsibility
Ministerial briefings		
Media briefings and releases	Media releases, briefings and events will be used to update the community on major Sydney Metro milestones.	Sydney Metro
Schools		
School education program	A school education program developed by Sydney Metro will be used to engage with primary and high school students.	Sydney Metro
Other requirements		
Site inductions	Site inductions will include communication and engagement requirements to ensure all members of the Sydney Metro and contractor teams are aware and respectful of our residential and business neighbours.	Project delivery communication team
Community engagement database	A web-based program used for the collection and recording of details regarding stakeholder and community contact and correspondence.	Project delivery communication team
Communication Interface Coordination Group (or superseding established group)	<p>Members would include communications representatives from interfacing projects with project sites shared or adjacent to Sydney Metro.</p> <p>The role of the Communications Interface Coordination Group is to:</p> <ul style="list-style-type: none"> • Establish relationships between communications teams from interfacing projects to facilitate effective handling of enquiries and complaints where relevant. • Provide an update on current and upcoming milestones, construction program and stakeholder and community issues. • Provide a forum to exchange information and coordinate communication and consultation activities to ensure a consistent approach to stakeholders, the community and others is delivered. Frequency of forums to be monitored by Sydney Metro and adjusted as appropriate. 	Sydney Metro/project delivery communication team

7. Site establishment communication

Establishing relationships with stakeholders and the community, including determining suitable forums for engagement is a key priority prior to site establishment for construction. During this stage of engagement, the project delivery communication team should prioritise face-to face communication as much as possible. Sydney Metro will provide support for these activities as outlined in Table 4.

Table 4: Pre-construction engagement priorities

Activity	Responsibility
	Pre-construction communication planning
	Prepare Community Communication Strategy (CCS) DRAFT and Small Business Owners Engagement Plans (SBOEP) DRAFT in accordance with the General Specification – Stakeholder and Community Engagement, planning approval and environmental protection licence requirements
	Set up site specific community email and 1800 phone number to receive correspondence
	Set up project delivery webpage
	Set up communication management system
	Prepare start of construction advertisement
	Establish area coordination groups
	Early site engagement/post planning approval
	Ministerial, stakeholder and government agency briefings
	Council briefings
	Prepare and seek approval from Sydney Metro for introductory communication material for community engagement
	Initial doorknock and introductory material delivered and follow up meetings established for consultation
	Conduct initial consultation with neighbouring properties, businesses and stakeholders to establish specific needs
	Refine CCS/SBOEP and gain approval from Sydney Metro prior to construction starting
	Establish forums for business and community engagement based on needs assessment
	Publish start of construction advertisement
	Pre-construction engagement
	Prepare and distribute introductory newsletter and email noting early engagement outcomes, project update, and forums available to attend prior to construction starting
	Prepare and seek approval for forum collateral including project A0 boards, factsheets and presentations
	Hold first forums (prior to construction starting) inviting relevant local project representatives at each site
	Erect temporary site signage and shade cloth (prior to hoarding being erected)
KEY Sydney Metro Project Delivery Communication Team	

8. Managing issues

8.1. Issue identification

It would be expected that the project delivery communication team would work collaboratively with Sydney Metro during pre-construction communication planning to understand key themes arising from the environmental assessment process. This includes gaining knowledge of the relevant environmental impact statement(s) or other planning approvals documentation, key mitigation measures, potential cumulative impacts, community, or stakeholder issues raised during the statutory planning process.

Sydney Metro expects the project delivery communication team would appoint dedicated place managers and use the following methods during early site engagement, pre-construction engagement and delivery to identify potential issues for their communities:

- Gather information about community, stakeholder and business needs and requirements to guide delivery communication approaches.
- Build relationships with local communities, residents, and business owners, particularly those near the site with a priority on personal and face-to-face communication to encourage open communication about concerns.
- Communicate early and often, providing accurate information about upcoming project works and potential impacts.
- Share information with other projects in the area (see cumulative impacts).

The project delivery communication team would be expected to work collaboratively with their environmental and construction counterparts, the Sydney Metro project implementation group, the project Environmental Representative and/or Airport Environment Officer to understand potential issues and agree on appropriate management approaches. This should be undertaken prior to escalating any issues as per the Sydney Metro CCMS.

The CCP must identify strategies for proactively identifying issues and appropriate mitigation measures.

8.2. Tools to manage issues



There are several tools available to assist projects in managing issues relating to construction and environmental impacts. These can be found in the following plans:





- Construction Environmental Management Framework.
- Construction Traffic Management Framework.
- Construction Noise and Vibration Standard.
- Applicable contract specific management plans.

8.3. Key issues and mitigation measures

The following communication and mitigation measures are considered a guide to managing potential issues. The project delivery communication team must identify the unique issues related to individuals and outline tailored mitigation measures which would also incorporate mitigation measures from the project's relevant planning approvals documentation.

Table 5: Key issues and mitigation measures

Issue	Communication and mitigation measures
Information about construction	
 <ul style="list-style-type: none"> • Lack of information • Coordination with other Transport Agencies • Temporary station closures at locations along the alignment where train possessions occur • Train replacement services 	<ul style="list-style-type: none"> • Regular notifications and newsletters (including contributing to other project notifications including Sydney Trains notifications for work during possessions) • One on one meetings on request • Doorknocks as required - both prior to works and as stakeholder checks after works • Attend stakeholder meetings to communicate Project information to their client base • Community contact facilities • Coordinate with projects and existing transport operations in close proximity to Sydney Metro works, regarding replacement services and temporary transport plans
<ul style="list-style-type: none"> • Coordination of information for tenants and property owners (including business owners) 	<ul style="list-style-type: none"> • Strata/building managers and owners notified of scheduled and emergency work in the area when necessary • Meetings arranged with strata/building managers and owners • Strata/building managers and owners informed of works before they commence • Coordinate communications through the Communication Interface Control Group • Implement the Small Business Owners Engagement Plan as required
Social Impacts	
 <p>Construction impacts potentially affecting:</p> <ul style="list-style-type: none"> • Way of life • Accessibility • Health and wellbeing • Community • Culture • Surroundings • Livelihoods • Decision-making systems 	<ul style="list-style-type: none"> • Implementation of all reasonable and feasible environmental and/or traffic management measures as outlined in relevant construction environmental management and traffic management plans • Management of property and cumulative impacts • Implementation of the OCCS (this plan), and site specific CCS' • Specific place manager involvement and support as required

	Issue	Communication and mitigation measures
	Utility relocation and continuity of supply <ul style="list-style-type: none"> • Utility works affecting footpath or road access 	<ul style="list-style-type: none"> • Detailed briefings for businesses potentially affected • Timing works, particularly service cutovers, to minimise potential impacts • Provide alternative service where necessary to maintain essential supply
	Visual amenity and visibility <ul style="list-style-type: none"> • Impacts to visual amenity (overlooking or directly next door to sites) • Vandalism of site hoarding • Visibility of retail signage and shopfronts 	<ul style="list-style-type: none"> • Retain vegetation where possible or for as long as practical • Protection of trees to be retained • Hoarding designed in line with Sydney Metro Brand Style Guidelines • Prompt graffiti removal from hoarding, buildings, plant and surroundings kept well maintained and clean • Hoarding designed to maximise visibility of retail signage and shopfronts. • Explore opportunities for signage and wayfinding to maintain business visibility • Implement Small Business Owners Plan to promote local businesses
	Cumulative impacts <ul style="list-style-type: none"> • Multiple works in the one location • Adjacent projects 	<ul style="list-style-type: none"> • Coordinate communications through the Communication Interface Control Group
	Transport interruptions <ul style="list-style-type: none"> • Temporary station closures 	<ul style="list-style-type: none"> • Rail replacement services • Advertisements, notifications and station attendants redirecting passengers to alternative services

Issue	Communication and mitigation measures
<div data-bbox="204 421 311 542" data-label="Image"> </div> <p data-bbox="352 405 572 427">Noise and vibration</p> <ul data-bbox="339 465 718 730" style="list-style-type: none"> • Effects on sensitive receivers • Effects on sensitive equipment • Effects on quiet enjoyment (particularly for food and beverage businesses) • Construction traffic noise (deliveries and spoil movements) • Vibration generated by construction activities 	<ul data-bbox="837 461 1358 1234" style="list-style-type: none"> • Early engagement with neighbouring stakeholders on likely noise and vibration impacts • Implementation of mitigation measures in the Construction Noise and Vibration Management Plan, Minor Works Approval, Out of Hours Approval and other documents and plans where relevant • Noise minimised through use of appropriate plant, tools and techniques and adaptive programming, where possible. Information on specific noise and vibration reduction outcomes for each site can be found in the relevant Construction Noise and Vibration Impact Statement. Noise reduction strategies to be implemented with consideration given hours of operation and sensitive periods. • High impact noise works staged with respite periods as required by any applicable Environment Protection Licence or planning approval • Temporary noise screens used around equipment, where appropriate • Staff induction and toolbox meetings prior to noisy activities to highlight acceptable work force behaviour • Noise and or vibration monitoring offered in response to complaints • Vibration monitoring undertaken on any adjoining heritage structures if outlined in the relevant Construction Noise and Vibration Impact Statement • Referral to Small Business Owners Engagement Plan for advice on small business complaints where appropriate
<div data-bbox="204 1339 311 1411" data-label="Image"> </div> <p data-bbox="352 1301 405 1323">Dust</p> <ul data-bbox="339 1352 762 1413" style="list-style-type: none"> • Dust generated by construction activities • Concern about health impacts of dust 	<ul data-bbox="850 1352 1326 1444" style="list-style-type: none"> • Dust minimised by using water carts, water sprayers, street sweepers, chemical and organic ground cover, hard stands and limiting activities on windy days where necessary

Issue	Communication and mitigation measures
<div data-bbox="220 439 296 533"></div> <p>Access</p> <ul style="list-style-type: none"> • Access for deliveries and customers • Traffic changes on local roads • Impacts to local street parking • Traffic modifications including changes to footpaths • Utility works affecting footpath or road access 	<ul style="list-style-type: none"> • Coordination of works with deliveries and business priorities, where possible • Installation of suitable signage to direct pedestrians, delivery drivers and customers where appropriate
<div data-bbox="212 734 300 853"></div> <p>Construction traffic</p> <ul style="list-style-type: none"> • Heavy vehicle movements on local roads 	<ul style="list-style-type: none"> • Implement site specific Traffic Management Plans • Coordinate traffic management in accordance with Construction Traffic Management Plan (CTMP) • Construction traffic movements minimised in peak times, where possible • Heavy vehicle specific access and egress locations and routes to minimise local congestion • Truck driver toolbox meetings on localised conditions • Out of hours deliveries to minimise impacts of oversized vehicles on local roads • Traffic Control Group
<div data-bbox="217 1137 296 1209"></div> <p>Property acquisition</p> <ul style="list-style-type: none"> • Concerns about property acquisition 	<ul style="list-style-type: none"> • Personal Manager involvement and support • Detailed meetings with supporting Centre for Property Acquisition information and Sydney Metro newsletters and fact sheets
<div data-bbox="209 1379 308 1444"></div> <p>Property impacts</p> <ul style="list-style-type: none"> • Concerns about potential property damage • Potential effects of vibration and settlement 	<ul style="list-style-type: none"> • Property Condition Surveys offered where eligible in line with relevant Construction Noise and Vibration Impact Statement (CNVIS) for each site • Vibration modelling information • Distribute fact sheets • Protection of heritage items using hoarding

9. Cumulative impacts

Sydney Metro will ensure coordination with interfacing projects to manage community and stakeholder issues.

Sydney Metro recognises that communities and stakeholders may be experiencing or have experienced impacts relating to other projects in their local area. This section outlines approaches to ensure cumulative impacts are considered in communication and engagement.

On the Sydney Metro – Western Sydney Airport project, coordination with Western Sydney Airport is essential for issues raised about work on sites within shared project areas.

9.1. Coordination for effective communication

Sydney Metro will host Communications Interface Coordination Groups for areas where projects interface. The purpose of these groups will be to provide a forum for exchange of information, understand any emerging concerns across the projects and to coordinate communication and engagement activities as appropriate.

Coordination and consultation with other projects will generally include:

- Provision of regular updates about the detailed construction program, construction sites and haul routes.
- Coordination of traffic notifications between projects.
- Coordination of engagement activities such as community information sessions, newsletters and notifications and complaint resolution.

This approach will support a range of other forums to address coordinating works with traffic and noise impacts and identifying potential conflicts in construction programs.

All enquiries and complaints made by the community and stakeholders will be managed in accordance with the Sydney Metro CCMS. It would be expected that the place manager on call would have general knowledge of other projects in the area to provide a personal approach and knowledge of who the complainant should contact for further information.

All phone calls to Sydney Metro's call centre, will be managed in accordance with the Sydney Metro call handling procedure. Community enquires that do not relate to Sydney Metro projects, will be forwarded to the relevant project.

Figure 7 illustrates the process for complaint and enquiry management across projects in similar areas.



Figure 7: Project related email / phone coordination

9.2. Occurrence of cumulative impacts

The project delivery communication team CCP must identify projects that Sydney Metro may interface within their project area including further opportunities for coordinated communication in consideration of cumulative impacts at each site, as relevant.

This may include:

- Other parts of Transport for NSW
- Local councils
- State government agencies
- Federal government agencies
- Western Sydney Airport
- Transport Coordination
- Department of Planning, Housing and Infrastructure
- Sydney Trains
- NSW Trains
- Sydney Buses
- Sydney Water
- Water NSW
- Port Authority of NSW
- Emergency service providers
- Utility providers
- Construction contractors.

10. Crisis and incident communication processes

In the unlikely event that a crisis or incident occurs, crisis communications management will be in place. Any communication management system prepared by the project delivery communication team as part of the Emergency Management Plan should align with Sydney Metro's Crisis Communications Plan.

Contract teams are required to invite the Director, Project Communications and the Executive Director, Communication and Engagement to attend and participate in formal incident and crisis communication exercises when they are conducted.

The project delivery communication team has the following responsibilities in relation to crisis communication:

- Immediately notify the Director, Communications within 10 minutes of any incident or issue that may have an impact on the community, environment, personnel, subcontractors, or other stakeholders or may attract the attention of the media, the Minister for Transport, a local MP, council, or the broader community. For any other incidents notify the Director, Communications within one hour of the incident occurring.
- Obtain approval from the Director, Communications before contacting or providing information to any person, other than that which is required to directly manage the incident or to comply with Law, including stakeholders, the media, or the public.
- Make available suitably qualified and experienced personnel to support the Director, Communications in responding to the community, the media, and other stakeholders.
- Provide all necessary communications materials that may need to be disseminated because of such incidents.

11. Monitoring, evaluation, and reporting

The project delivery communication team is responsible for monitoring the effectiveness of strategies to inform and to minimise impacts of construction on the community, including businesses. The project delivery communication team is required to provide detailed information to Sydney Metro each month on performance criteria outlined in this plan and site specific CCPs including:

- Enquiry and complaint trends and how lessons learned are being applied across the project to avoid issues recurring, highlighting sensitive receivers and small businesses.
- The status of complaints and details of any escalation required.
- Communication tools used to engage with stakeholders and the community including doorknocks, meetings, presentations, notifications, newsletters and the Sydney Metro Connect App

11.1. Audit and review – package specific CCPs

The OCCS (this document) will be reviewed and reissued annually.

Evaluation of the performance and effectiveness of the site specific project delivery communication team CCPs and SBOEPs will be undertaken every six months or as required. Key elements of the evaluation will include examining the adequacy of the plans and their implementation in achieving the intent of the consultation as evidenced by the items in table 6.

For the Sydney Metro – Western Sydney Airport, and in line with the Airport Plan (Western Sydney Airport), each evaluation will be followed by a statement confirming the Rail Authority (Sydney Metro) is satisfied that the CCPs comply with the Airport Plan requirements.

Table 6: Six monthly CCP/SBOEP audit requirements

Performance parameters	Plan	Measures	Reporting
Identifying all potential local community, businesses (including small businesses) and stakeholders that may be impacted by or have an interest in the project (based on the stakeholder categories provided in this plan)	CCPs/SBOEP	Inclusion of a thorough stakeholder scan of local community, businesses and stakeholders including maps.	Accurate and up-to-date listings of local businesses noting of leases and ownership at least every six months and any changes to business operations.
Appropriateness of communication and engagement tools	CCPs/SBOEP	A communication tool matrix and/or table detailing communication tools to be used for which stakeholders and why.	Communication matrix and/or table to be updated at least every six months to adjust approach to specific impacts, community

Performance parameters	Plan	Measures	Reporting
			needs, and lessons learned.
Identifying appropriate mitigation measures to address issues and minimise impacts	CCPs/SBOEP	<p>Inclusion of mitigation measures that would be used in response to identified issues.</p> <p>A detailed complaint investigation process to ensure mitigation measures are considered before escalating complaints to the next level (as per the CCMS).</p>	Appropriateness of mitigation measures to accommodate community needs and lessons learned to be reviewed at least every six months and the project delivery communication team CCPs to be updated accordingly.
Cumulative impacts process	CCPs	<p>Inclusion of identified nearby projects and tools/forums to engage with projects.</p> <p>Processes for coordination of communication, including project collateral and face-to-face events.</p>	Nearby project information to be reviewed regularly and updated as part of the project delivery communication team CCP reviews, including any new processes, at least every six months.

11.2. Audit and review – businesses

The project delivery communication team will compile monitoring data and include lessons learned based on the items in Table 7, when required.

Table 7: Six monthly monitoring program and performance measures for businesses

Performance parameters	Measures	Monitoring	Reporting
Awareness of construction activity and likely impacts.	<p>Notifications issued within required timeframes on 100 per cent of occasions, unless otherwise agreed with Sydney Metro.</p> <p>Number of business briefings, building-based information sessions and</p>	<p>Records in community engagement database on number and timing of notifications.</p> <p>Records in community engagement database on number of (and attendance at) briefings, information sessions and completed</p>	<p>Number of notifications issued.</p> <p>Percentage of notifications issued on time.</p> <p>Number of briefings, information sessions and completed doorknocks.</p>

Performance parameters	Measures	Monitoring	Reporting
	<p>face-to-face meetings prior to works.</p> <p>The objective is to make contact via these measures with 100 per cent of businesses within 50 metres prior to works that have the potential to impact the owners.</p>	<p>doorknocks/face-to-face meetings.</p> <p>Feedback from meetings, presentations, and briefings (documented in community engagement database).</p> <p>Records in community engagement database on complaints received from businesses relating to lack of information about construction activities and impacts.</p>	<p>Percentage of businesses within 50 metres contacted prior to works.</p> <p>Number of complaints received from businesses relating to information about construction activities and impacts.</p> <p>Lessons learned.</p>
Measures implemented to maintain business vehicle and pedestrian access, parking, visibility, and amenity during construction activity.	<p>Potential issues identified in advance and mitigation measures implemented in consultation with affected businesses to address access, parking, visibility and/or amenity issues.</p> <p>The objective is 100 per cent implementation of agreed mitigation measures relating to access, parking, visibility, and other amenity aspects.</p>	<p>Consultation with businesses on potential impacts and mitigation measures (documented in community engagement database).</p> <p>Feedback on effectiveness of mitigation measures (documented in community engagement database).</p> <p>Records in community engagement database on complaints received from businesses relating to vehicle and pedestrian access, parking, visibility, and amenity, including details of any repeat complaints about the same issue.</p>	<p>Number of businesses with mitigation measures agreed in advance to address access, parking, visibility, or amenity issues.</p> <p>Percentage of businesses where mitigation measures were implemented as agreed.</p> <p>Details of mitigation measures implemented.</p> <p>Business feedback on effectiveness of mitigation measures.</p> <p>Number of repeat complaints received from businesses relating to vehicle and pedestrian access, parking, visibility, and amenity.</p> <p>Lessons learned.</p>
Agreed measures to minimise noise and vibration impacts on	Agreed mitigations implemented, including agreed respite, work methods, proactive	Consultation with businesses on noise and vibration impacts and mitigation measures	Number of businesses with agreed mitigation measures to address noise and vibration impacts.

Performance parameters	Measures	Monitoring	Reporting
noise and vibration sensitive businesses.	<p>engagement, and ongoing communication.</p> <p>Businesses identified as potentially affected by high noise for extended periods, and requests for at property treatment or relocation, referred to Sydney Metro if all negotiated solutions offered under the scope of the contract fail to provide an acceptable solution to the impacted businesses.</p> <p>The objective is for zero referrals to Sydney Metro over a six-month timeframe during standard construction.</p>	<p>documented in community engagement database.</p> <p>Documentation of affected businesses impacts and mitigation measures in site-specific Construction Noise and Vibration Impact Statement reports.</p> <p>Feedback on effectiveness of mitigation measures (documented in community engagement database).</p> <p>Records of businesses referred to Sydney Metro for additional assessment / treatment.</p> <p>Records in community engagement database on noise and vibration complaints from businesses.</p>	<p>Summary of non-standard mitigation measures implemented.</p> <p>Number of referrals to Sydney Metro.</p> <p>Number of repeat complaints from noise sensitive receivers relating to noise and vibration impacts.</p> <p>Lessons learned.</p>
Awareness of construction activity and likely impacts.	<p>Notifications issued within required timeframes on 100 per cent of occasions, unless otherwise agreed with Sydney Metro.</p> <p>Number of business briefings, building-based information sessions and face-to-face meetings prior to works.</p> <p>The objective is to make contact via these measures with 100 per cent of businesses within 50 metres prior to works that have the potential to impact the owners.</p>	<p>Records in community engagement database on number and timing of notifications.</p> <p>Records in community engagement database on number of (and attendance at) briefings, information sessions and completed doorknocks/face-to-face meetings.</p> <p>Feedback from meetings, presentations and briefings (documented in community engagement database).</p> <p>Records in community engagement database on complaints received from businesses relating to lack of information about construction activities and impacts.</p>	<p>Number of notifications issued.</p> <p>Percentage of notifications issued on time.</p> <p>Number of briefings, information sessions and completed doorknocks.</p> <p>Percentage of businesses within 50 metres contacted prior to works.</p> <p>Number of complaints received from businesses relating to lack of information about construction activities and impacts.</p> <p>Lessons learned.</p>

12. Low impact or preparatory activities process

12.1. Purpose

This implementation process describes the approach Sydney Metro will use to manage engagement and ongoing consultation with stakeholders, and the community and businesses with an interest in, or potentially affected by Sydney Metro low impact or preparatory activities.

Low impact work is defined within State significant infrastructure conditions of approval for Sydney Metro projects as work that is not considered main construction works but will support main construction activities. Preparatory activities is a term defined within the Western Sydney Airport Plan and may apply to the variation to the Airport Plan for on-airport works for Sydney Metro – Western Sydney Airport. Each of these terms are described in more detail in Table 8 below.

This low impact or preparatory activities plan must be implemented in conjunction with the overarching requirements outlined in this strategy.

12.2. Relationship to plans

The intention of this low impact or preparatory activities implementation process is to cover low impact or preparatory activities prior to the main construction works starting. Low impact activities may be conducted by Sydney Metro or its contractors.

Contractors must follow all requirements of the General Specification – Stakeholder and Community Engagement in carrying out low impact and/or preparatory works including development of public communication materials. At the commencement of Construction, Contractor activities will be covered by the project delivery communication team Community Communication Strategy.

12.3. Low impact and preparatory activities

For the purposes of this process, low impact activities, undertaken under a relevant planning approval, are defined as:

- Survey, survey facilitation and investigations works (including geotechnical investigations, road and building dilapidation survey works, drilling and excavation).
- Treatment of contaminated sites.

Establishment of ancillary facilities including construction of ancillary facility access roads and providing facility utilities.

- Operation of ancillary facilities that have minimal impact on the environment and community.
- Clearing and relocation of vegetation (including native).

- Installation of mitigation measures, including erosion and sediment controls, temporary exclusion fencing for sensitive areas and acoustic treatments.
- Property acquisition adjustment works, including installation of property fencing and utility relocation and adjustments to properties.
- Utility relocation and connections that have minimal impact on the environment and community.
- Maintenance of existing buildings and structures.
- Archaeological testing under the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010) or archaeological salvage and clearance undertaken in association with other low impact work to ensure there is no impact on heritage items.
- Any other activities that have minimal environmental impact.

Preparatory activities are generally defined in the Western Sydney Airport Plan as the following:

- Day to day site and property management activities
- Site investigations, surveys (including dilapidation surveys), monitoring and related works (e.g. geotechnical or other investigative drilling, excavation, or salvage)
- Establishing construction work sites, site offices, plant and equipment, and related site mobilisation activities (including access points, access tracks and other minor access works, and safety and security measures such as fencing but excluding bulk earthworks)
- Enabling preparatory activities such as demolition or relocation of existing structures (including buildings, services, utilities and roads) and the disinterment of human remains
- Any other activities which are determined preparatory activities.

Prior to low impact or preparatory activities taking place, a pre-construction work form will be completed for approval by the project delivery communication team.

12.4. Monitoring and reporting

Due to the short-term and intermittent nature of low impact activities to businesses, business monitoring as outlined in Section 8 of this OCCS will not be undertaken for work covered by section 12.

Feedback received during proactive doorknocks and incoming correspondence (emails and phone calls) will be informally monitored and any dissatisfaction from businesses recorded and managed in accordance with the CCMS in the first instance. Complaints are reported on daily through the Daily Complaints Report and quarterly in the Construction Compliance Report.

Table 8: Communication tools for low impact or preparatory activities

Activity	Communication tools	Stakeholder	Timing
Survey and site investigations, including geotechnical investigations	Notification letter ¹	Delivered to properties within 50m or work in standard construction hours, 100m for out of hours work ²	7 days prior to work starting
	Sydney Metro Connect	Sent to stakeholder distribution email lists	
	Doorknock (if intrusive or loud)	Immediate neighbours	
Site establishment (including vegetation clearing, fencing, controls etc.)	Newsletter	Local council Local member Senior stakeholders Local groups Delivered to properties within 500m	At site establishment As required
	Notification letter	Delivered to properties within 200m for night work and 100m for day work ² Local groups	7 days prior to work starting
	Site signage Hoarding banners Directional signage	People passing by the site	As required
	Doorknock	Properties within 50m Educational and religious institutions	7 days prior to work starting
Out of hours work	Notification letter ²	Delivered to properties within 200m ² Local groups	7 days prior to work starting
	Doorknock	Properties within 50m	7 days prior to work starting

¹ Where work is undertaken wholly within the rail corridor, during a possession, the notification will be distributed by Sydney Trains. See explanation for 'Work during rail possessions'.

² This area will expand if the noise assessment shows a wider impact radius.

Activity	Communication tools	Stakeholder	Timing
Planned service disruptions	Included in notification letter	Delivered to properties within 200m ²	7 days prior to disruption
Emergency work	Notification letter Doorknock	Affected properties	Within 2 hours
Work during rail possessions	Sydney Trains notification	Sydney Trains delivery area (250m on either side of the rail corridor)	Delivered prior to possession period by Sydney Trains
Construction milestones	Included in notification letter	Delivered to properties within 100m or work in standard construction hours, 200m for out of hours work ²	7 days prior to new milestone
	Doorknock	Properties within 50m Educational and religious institutions	7 days prior to new milestone
	Briefings	Local council Local member Senior stakeholders Local groups Government agencies Specific businesses as required	As required or requested
Traffic changes, including any public transport changes	Included in notification letter	Delivered to properties within 100m or work in standard construction hours, 200m for out of hours work ²	7 days prior to work starting 7 days prior to new milestone
	VMS Traffic alert Bus stop notices	Road users	7 days prior to work starting 7 days prior to new milestone
Emergency work	Notification letter Doorknock	Affected properties	Within 2 hours
Transport infrastructure disruptions	Notification letter Bus stop notices Directional signage	Transport users Local council Transport agencies	As required



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Construction Environmental Management Plan

Project: EWNS

Job No: CO2262

Appendix 0 – SMW Construction Complaints Management System

See *Construction Complaints Management System (SM-20-0013070)* – appended to this plan.

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Version: 1.0

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Construction Complaints Management System

[SM-20-00139070]

Metro Body of Knowledge (MBoK)

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1. Construction complaints management system

1.1. Document purpose

This document forms part of the Sydney Metro Communication and Engagement Management System. Its purpose is to outline the procedure for managing complaints across Sydney Metro West, Sydney International Speedway (construction related complaints) and Sydney Metro – Western Sydney Airport. This includes:

- Receiving complaints
- Classifying complaints
- Responding to complaints
- Managing unreasonable conduct
- Escalation
- Mediation
- Recording complaints
- Reporting

This construction complaints management system will be reviewed annually and reissued as required.

1.2. Responsibilities

Complaints handling is the responsibility of all team members who come into contact with the community and stakeholders. The Director, Project Communications is the designated complaints handling management representative for the escalation of complaints.

Table 1: Responsibilities for complaints

Role/Organisation	Responsibility
Environmental Representative	<ul style="list-style-type: none"> • Assist in resolving complaints in accordance with this document. • Investigate and review any complaint escalated by the Director, Project Communications where a member of the public is not satisfied with the response. • Provide recommendations to Sydney Metro to assist in resolving the complaints that may include mediation services.
Acoustic Advisor (where required by planning approval)	<ul style="list-style-type: none"> • Assist in resolving complaints in accordance with this document.

Role/Organisation	Responsibility
Independent mediation (as required)	<ul style="list-style-type: none"> • Provide mediation services deemed relevant to any complaint escalated by the Director, Project Communications or the Environmental Representative. • Request advice from the Environmental Representative, Acoustic Advisor (if required by planning approval) or any other subject matter expert as required to assist in the effective provision of mediation services.
Sydney Metro Project Communications team	<ul style="list-style-type: none"> • Manage Sydney Metro 24-hour call centre. • Implement the Construction Complaints Management System (this document). • Treat all people with respect. • Assist people to make a complaint where required. • Provide feedback and suggestions on ways to improve complaint management. • Implement changes arising from complaints and from the analysis and evaluation of complaint data as advised by senior managers. • Forward relevant complaints to contractors, Sydney Trains/TfNSW/Parramatta Light Rail/WestConnex/Western Sydney Airport immediately. • Investigate and determine the source of a complaint, including an initial call to the complainant if more information about the complaint is needed (when received by phone or where a telephone number was provided or is available on the community engagement database). • Provide an initial response to all complaints within two hours (where a phone number is provided or is available on the community engagement database) of the complaint being received (unless provisions in Section 4.4 apply). • Provide a written response to emails, letters/faxes within 24 hours (or verbally within two hours if a phone number is provided or available on the community engagement database) of being received (unless provisions in Section 4.4 apply). • Keep the complainant informed about the progress of their complaint, if necessary. • Close out complaints. • Provide advice and guidance on complaint management to contractors and ensure they take all reasonable steps to address complaints, implement recommendations, mitigate impacts and reduce or prevent future complaints. • Ensure that contractors have exhausted all internal avenues for resolving complaints (as outlined in Section 5.1.1.) PRIOR to escalation to the Director, Project Communications. • Report and escalate any unreasonable conduct by complainants to the Director, Project Communications (as outlined in Section 4.4). • Escalate complaints in accordance with the Construction Complaints Management System (this document). • Record all complaints in the community engagement database within 24 hours, in accordance with the data entry procedure. Details should include how the complaints were managed and closed out.

Role/Organisation	Responsibility
Contractor delivery communication teams	<ul style="list-style-type: none"> • Answer all phone calls transferred by the call centre from the community information line (calls to be answered by a team member 24/7, not an answering machine, while construction activities are occurring). • Develop and implement procedures for managing and resolving stakeholder and community complaints directed to the contractor in accordance with the Construction Complaints Management System (this document) and the relevant projects' Conditions of Approval. • Refer complaints not associated with contractor activities to the Sydney Metro Project Communications team immediately. • Investigate and determine the source of a complaint, including an initial call to the complainant if more information about the complaint is needed (when received by phone or where a telephone number was provided or is available on the community engagement database). • Provide an initial verbal response to all complaints within two hours (where a phone number is provided or is available on the community engagement database) of the complaint being received (unless provisions in Section 4.4 apply) • Provide a written response to emails, letters/faxes within 24 hours (or verbally within two hours if a phone number is provided or available on the community engagement database) of being received (unless provisions in Section 4.4 apply) • Keep the complainant informed about the progress of their complaint until it is resolved. • Respond to requests for information from the Sydney Metro Project Communications team or the Environmental Representative, Acoustic Advisor or mediator within two hours. • Comply with the advice, guidance and processes of the Sydney Metro Project Communications team and/or the Environmental Representative, Acoustic Advisor or mediator at all stages of the complaints management and complaints escalation (if applicable) process. • Take all reasonable actions and measures to prevent reoccurring complaints, including incorporating recommendations made during any escalation or review processes. • Close out complaints. • Escalate complaints in accordance with the Construction Complaints Management System (this document). • Report and escalate any unreasonable conduct by complainants to Sydney Metro (as outlined in Section 4.4). • Report any complaints received to the Sydney Metro Project Communications team and the Environmental Representative on a daily basis. • Record all complaints in the community engagement database within 24 hours. Details should include how the complaints were managed and closed out.

Role/Organisation	Responsibility
Sydney Trains/TfNSW/Parramatta Light Rail/WestConnex/Western Sydney Airport	<ul style="list-style-type: none"> Refer complaints received about Sydney Metro work to Sydney Metro for investigation and resolution. Assist in resolving complaints where work may overlap in the rail corridor.
Western Sydney Airport	<ul style="list-style-type: none"> Refer complaints received about Sydney Metro work to Sydney Metro to be investigated and resolved. Assist in resolving complaints where work may overlap in the rail corridor. Investigate and review any complaint escalated by the Director, Project Communications where a member of the public is not satisfied with the response. Provide recommendations to Sydney Metro to assist in resolving complaints that may include mediation services.
Greater Sydney Parklands/Speedway Promotions	<ul style="list-style-type: none"> Refer construction related complaints to Sydney Metro to be resolved. Investigate and resolve complaints related to operation of Sydney International Speedway. Implement Operations Complaints Management System and Operations Complaints Register. Provide relevant information to Sydney Metro for entry into Sydney Metro Complaints Management Register.
Department of Planning and Environment and NSW Environment Protection Authority and local Councils	<ul style="list-style-type: none"> Refer complaints received about Sydney Metro work to the Sydney Metro Project Communications team for investigation and resolution in the first instance.

1.3. Conditions of approval

Each project's approval is expected to have requirements around complaints handling including the creation of a Construction Complaints Management System. This document fulfils these requirements for Approvals related to the following projects:

- Sydney Metro West
- Sydney International Speedway
- Sydney Metro Western Sydney Airport

Sydney Metro will manage construction related complaints for Sydney International Speedway. Complaints related to operations will be managed by the landowner Greater Sydney Parklands and venue operator Speedway Promotions.

1.4. Complaints handling

Sydney Metro's approach to managing complaints is based on the following guiding principles:

1.4.1. Accessibility

All Sydney Metro public materials will direct stakeholders wishing to make a complaint to use our:

- Community information line
- Community email address
- Project postal address
- Form on the Sydney Metro website.

1.4.2. Responsiveness

Our responsibilities for complaint handling include:

- Investigate and determine the source of a complaint, including an initial call to the complainant if more information about the complaint is needed (when received by phone or where a telephone number was provided or is available on the community engagement database).
- Provide an initial response to all complaints within two hours (where a phone number is provided or available on the community engagement database) of the complaint being received (unless provisions in Section 4.4 apply).
- Keep the complainant informed about the progress of their complaint, if necessary.

All complaints will be managed on a case-by-case basis. There may be occasions where the above steps cannot be followed, such as when the health, safety and wellbeing of our staff and/or contractor delivery teams are at risk.

1.4.3. Confidentiality

Personal information that identifies individuals will only be disclosed or used by Sydney Metro as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations. Sydney Metro may disclose complainant information to its contractors, employees and agents and other third parties as necessary from time to time in accordance with the Sydney Metro Privacy Notice. Personal information may also be forwarded to Government agencies to allow them to undertake their regulatory duties.

A stakeholder's contact information along with their complaint will be recorded for the purposes of addressing their complaint. If they wish to remain anonymous, the complaint will be registered as an 'Anonymous' stakeholder for record keeping and reporting purposes.

Any complaints management process undertaken by the independent advisors will be subject to confidentiality provisions. These provisions will be explained to all parties involved.

1.4.4. Continual improvement

This Construction Complaints Management System will be reviewed and reissued annually, or as required. A review of processes and customer feedback will be incorporated to ensure continual improvement.

2. Receiving complaints

Sydney Metro has established the following tools for receiving complaints from the community. At a minimum, the Sydney Metro telephone number, postal address and email address will be provided on the Sydney Metro website.

Contractors will be encouraged to develop other innovative ways to distribute these tools to the community.

Table 2: Community contact tools

Tools	Explanation and purpose
Community information line	<p>This allows stakeholders and the community to have access to the Sydney Metro project teams 24 hours a day during construction. All communication materials and the website will include the relevant community information line number.</p> <ul style="list-style-type: none"> Sydney Metro West – 1800 612 173 Sydney International Speedway – 1800 612 173 Sydney Metro - Western Sydney Airport – 1800 717 703 <p>During construction, community calls will be redirected to the relevant contractors as required.</p>
Community email address	<p>This allows stakeholders and the community to have access to the Sydney Metro project teams. All communication materials and the website will include the community email address.</p> <ul style="list-style-type: none"> Sydney Metro West – sydneymetrowest@transport.nsw.gov.au Sydney International Speedway - sydneymetrowest@transport.nsw.gov.au Sydney Metro - Western Sydney Airport – sydneymetrowsa@transport.nsw.gov.au <p>During construction, community emails will be redirected to the relevant contractors as required.</p>
Community post box	<p>This central postal address allows stakeholders and the community to have access to the Sydney Metro project teams. The website will include a central Sydney Metro community postal address.</p> <p>Correspondence will be redirected to the relevant project teams and contractors as required.</p> <ul style="list-style-type: none"> Sydney Metro - PO Box K659, Haymarket, NSW 1240

Tools	Explanation and purpose
Sydney Metro website	<p>Information about the project will be available on the Sydney Metro website. The website will be referenced in all communication materials as a source of information and will be updated on a regular basis. Information will include:</p> <ul style="list-style-type: none"> • Project information including: <ul style="list-style-type: none"> – Description of the project, current status and timing – Newsletters – Notifications – Up-to-date project information – Graphics and images on the project background and progress – Copies of relevant reports – Photos, images and maps – Links to documents as required under the relevant projects Conditions of Approval – A link to Sydney Metro contractor webpages • Contact information and web form available at: sydneymetro.info/get-touch

3. Classification of complaints

The Australian and New Zealand Standard Guidelines for complaint management in organisations AS/NZS 10002:2014 (AS/NZS Complaint Management Standard) defines complaints as an:

Expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

Based upon this standard a complaint includes:

- A complaint about conduct, service, or product
- An internal review of a complaint – request a review of the merits of a decision
- An internal review about how a complaint was handled
- An external review of a complaint or how the complaint was handled

Sydney Metro classifies complaints into two categories for reporting purposes:

- Unavoidable complaints
- Avoidable complaints.

The main aim of these complaint categories is to record complaints received, but not unfairly penalise our contractors for complaints received about works they have approval to do.

3.1. Unavoidable complaints

Unavoidable complaints include a stakeholder's opposition to the project or government policy or complaints about issues that are within project planning approvals.

For example:

- A complaint about noise generated at night when planning approval has been granted for night works and the noise generated is within approved criteria.
- A complaint about how traffic is being controlled when the approved Traffic Management Plan is being implemented.

3.2. Avoidable complaints

Complaints about issues outside planning approval, or a commitment that has been given to the community or stakeholders. These commitments may be contained in staff inductions or written notifications.

For example:

- A complaint about noise at night where work is being performed outside of the approved criteria. For example: work outside of approved (or notified) construction hours or approved noise levels.
- A complaint about how traffic is being controlled. Only applies when the approved Traffic Management Plan is not being implemented.
- A complaint about poor worker behaviour, for example: littering, swearing, poor driving behaviour, when an induction has specified that behaviour is not acceptable.

3.3. Determining an unavoidable complaint

When categorising a complaint as 'unavoidable' evidence should be referred to in the complaint notes about why the complaint has been categorised this way.

Sydney Metro can provide contractors with advice and guidance on the types of evidence that must be recorded in the community engagement database.

3.4. Resolving classification

If the Sydney Metro Project Communications team and the contractor cannot agree on a classification of unavoidable, the Independent Environment Representative may assist in classifying the complaint as it relates to the planning approval or commitments given to the community.

4. Responding to complaints

4.1. Receiving a complaint

Upon receipt of a complaint, the details will be recorded in the community engagement database. Accurate records will be maintained about when the complaint was received, how it was handled and what the outcomes of the complaint were.

Complainants may be informed in general terms of:

- The complaints processes and procedures that Sydney Metro will follow
- The likely timeframes for completing tasks relating to the complaint
- Sydney Metro's responsibility in relation to the complaint and the complainant.

It is important to outline what is expected from complainants. Complainants must:

- Clearly identify their issues of complaint
- Provide all relevant information about their complaint
- Cooperate with any requests for information
- Act honestly
- Treat the people handling their complaint with courtesy and respect.

For complaints about on-airport works, Sydney Metro will notify Western Sydney Airport.

4.2. Referring complaints

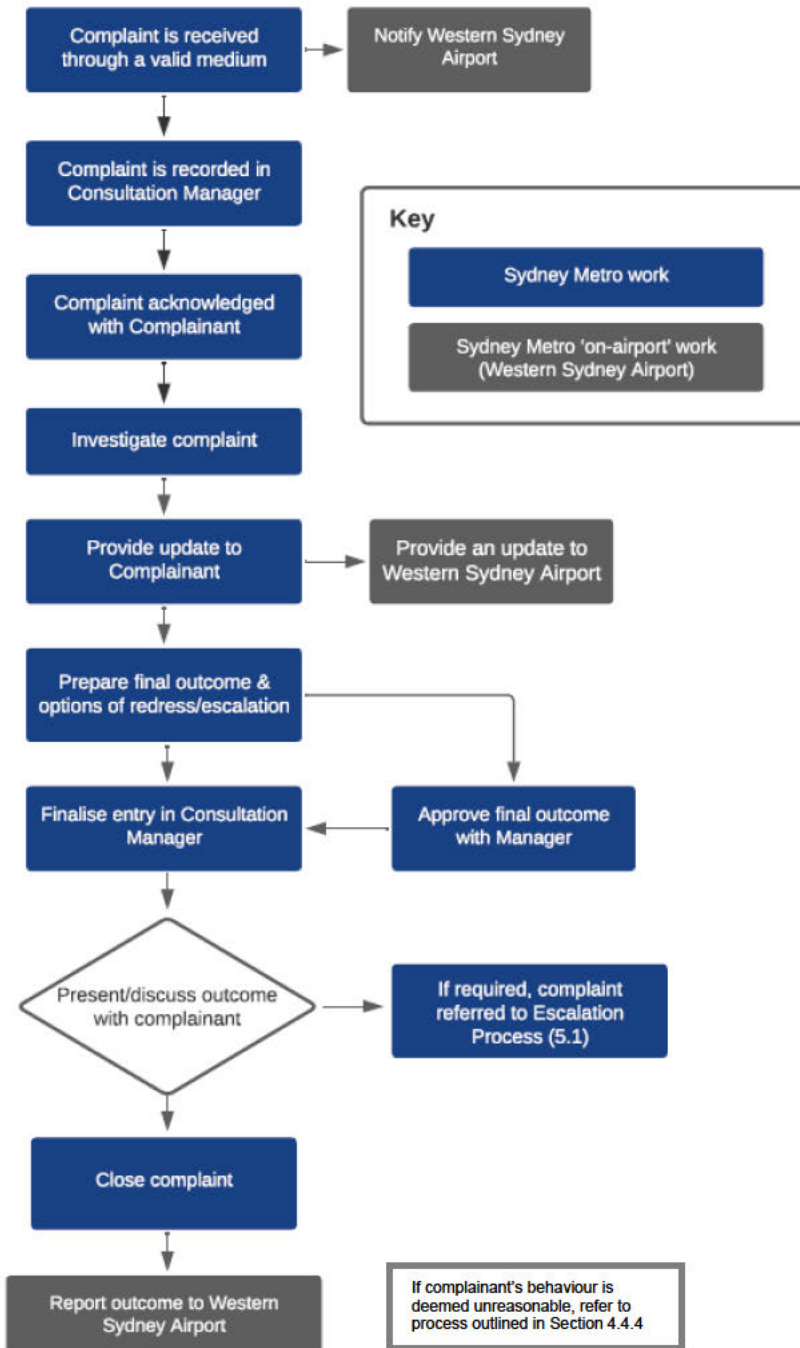
Regardless of how a complaint is received, it must be referred to the most appropriate agency as soon as it is received. The following table outlines the referral process:

Table 3: Guideline for referring complaints

Type of complaint	Description	Referred to
Early construction works	Complaint is about early works activities or the early works contractor	Place Manager, Early Works or contractor representative
Construction site specific	Complaint is about construction work, behaviour or activities at/or around a Sydney Metro construction site (except early construction works)	Relevant construction contractor representative
Overall project or government policy	Complaint about the need for the project, the projects procedures, the approval process, or TfNSW policy position	Sydney Metro Director, Project Communications
Media	Complaint has come via a member of a media organisation	Sydney Metro Director, Project Communications
Government or ministerial enquiry	Complaint has come via a member of a local, state or federal government body, government department or ministerial department	Sydney Metro Director, Project Communications
Unrelated to Sydney Metro	Complaint is unrelated to Sydney Metro	Sydney Metro Communications Manager
Precinct Planning	Complaint related to precinct planning around Sydney Metro station sites	Sydney Metro Senior Communications Manager
Relates to other TfNSW projects	Complaint is unrelated to Sydney Metro but relates to other areas of TfNSW or other TfNSW projects	Relevant area of TfNSW
Relates to NSW Government projects	Complaint is received by Sydney Metro that relates to other areas of NSW Government or NSW Government projects	Relevant area of NSW Government
Relates to Sydney Trains	A complaint received by Sydney Metro that relates to work being done by Sydney Trains in the same vicinity during a possession	Relevant area of Sydney Trains
Relates to Western Sydney Airport	A complaint received by Sydney Metro that relates to work being undertaken by Western Sydney Airport within the airport site	Western Sydney Airport Project Communications
Relates to Sydney International Speedway operations	A complaint received by Sydney Metro that relates to operation of the Sydney International Speedway	Greater Sydney Parklands and Speedway Promotions

4.3. Responding to complaints

Responding to Complaints



4.4. Managing unreasonable conduct by complainants

Sydney Metro's process for managing unreasonable conduct by complainants is aligned with the NSW Ombudsman's guidelines as outlined in the [Managing Unreasonable Conduct by a Complainant Manual 2021](#). The following process is separate from *Responding to complaints* (Section 4.3) and *How to escalate a complaint* (Section 5.1.1) and will be implemented only when unreasonable conduct by a complainant has occurred.

Unreasonable, abusive and/or threatening conduct towards our staff and/or contractors will not be tolerated. Sydney Metro reserves the right to end conversations, either via phone, email or in person, if a complainant's conduct is endangering the health, safety and/or wellbeing of our people.

4.4.1. Defining unreasonable conduct by complainants

Unreasonable conduct by a complainant can be defined as any behaviour by a current or former complainant that, due to its nature or frequency, raises health, safety, resource or equity issues for relevant parties. The parties that may be detrimentally affected include:

- The organisation responsible for handling the complaint
- The person managing the complaint
- The person dealing directly with the complainant
- The person making the complaint and other complainants and services.

In accordance with the NSW Ombudsman's Managing Unreasonable Conduct by a Complainant Manual 2021, the types of conduct that may be viewed as unreasonable include:

- Unreasonable persistence – complainants sending excessive amounts of correspondence or persisting with their issues in an incessant manner and refusing to accept final decisions.
- Unreasonable demands – any demands, express or implied, that are made by a complainant insisting on outcomes that move the goal posts, are unattainable, or demand their complaint is dealt with in ways that would result in disproportionate impacts or substantial issues.
- Unreasonable lack of cooperation – an unwillingness to cooperate with our organisation, staff, or complaints system and processes. This may include providing disorganised, excessive or irrelevant information, being unwilling to consider other valid viewpoints or refusing to define their issues of complaint.
- Unreasonable arguments – any arguments that are not based in reason or logic, that are incomprehensible, false, inflammatory, trivial and refuse to accept other more reasonable interpretations.
- Unreasonable behaviour – conduct that is unreasonable in all circumstances, regardless of how stressed, angry or frustrated a complainant is, because it harasses, utilises foul or abusive language, or unreasonably compromises the health, safety and security of our staff, other service users or the complainant himself/herself.

4.4.2. Minimising unreasonable conduct by complainants

Sydney Metro will endeavor to minimise unreasonable conduct by complainants as much as possible by implementing the following strategies:

- Set clear expectations with staff managing complaints and ensure staff treat complainants fairly and respectfully
- Ensure staff managing complaints are trained in handling unreasonable conduct by complainants and are familiar with the process as outlined in the CCMS
- Establish ground rules about the conduct expected of complainants
- Clearly communicate the expected conduct to the complainant, when appropriate, including what staff can/cannot do, what communication is expected, who will be involved, the process and possible outcomes
- Record and report on all complaints and actions taken in response to unreasonable conduct by complainants

4.4.3. Determining unreasonable conduct by complainants

Sydney Metro Director, Project Communications will determine if the complainant's conduct is considered unreasonable as per the types of behaviour outlined in section 4.2 of this document. Sydney Metro will consider the following factors prior to determining the complainant's behaviour as unreasonable:

- merit of issue/s raised
- impact/s on staff and/or contractors
- the complainant's circumstances
- the complainant's behaviour in proportion to the issue
- the complainant's responsiveness to the issue/s
- if conduct is unacceptable (such as aggression, violence, harassment and/or threats)
- whether personal boundaries with staff and/or contractors have been breached
- legislative requirements

If the complainant's conduct is determined as unreasonable by Sydney Metro Director, Project Communications, further strategies to manage the complainant's behaviour may be implemented. This may involve the implementation of communication approaches to manage the complainant's conduct and set boundaries around acceptable and unacceptable conduct.

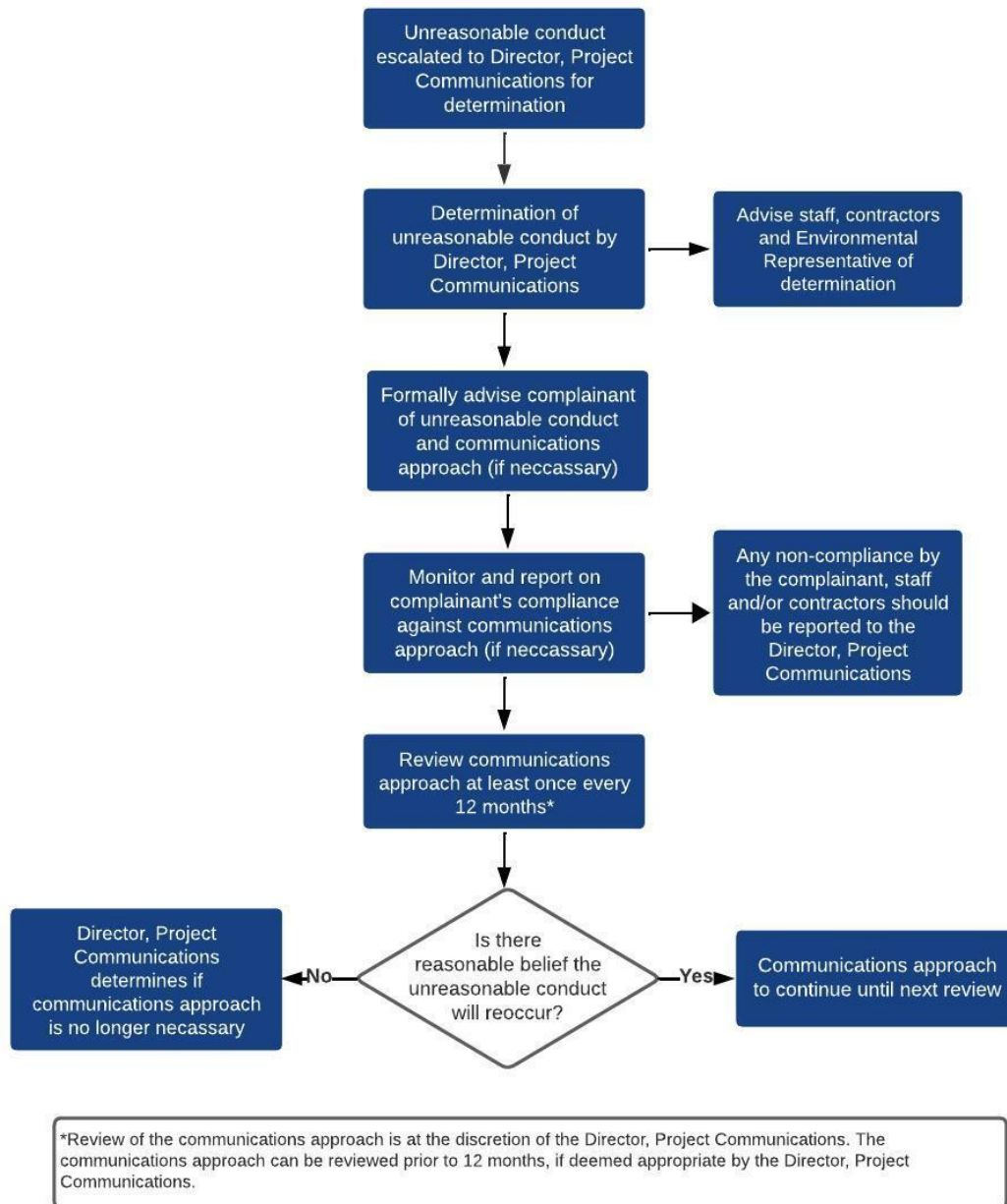
Should the complainant's conduct be serious, threatening or repeated on an ongoing basis and/or have the potential to jeopardise the health, safety and/or wellbeing of staff and/or contractors, Sydney Metro may deem it necessary to restrict contact with the complainant.

The decision to restrict contact would be determined by Sydney Metro Director, Project Communications.

The process for managing unreasonable conduct by a complainant is outlined in section 4.4.3 of this document.

4.4.4. Managing unreasonable conduct by a complainant process

Process for managing unreasonable conduct by a complainant



5. Complaint escalation process

5.1. When to escalate a complaint

Complaints may be subject to an internal escalation process in circumstances when:

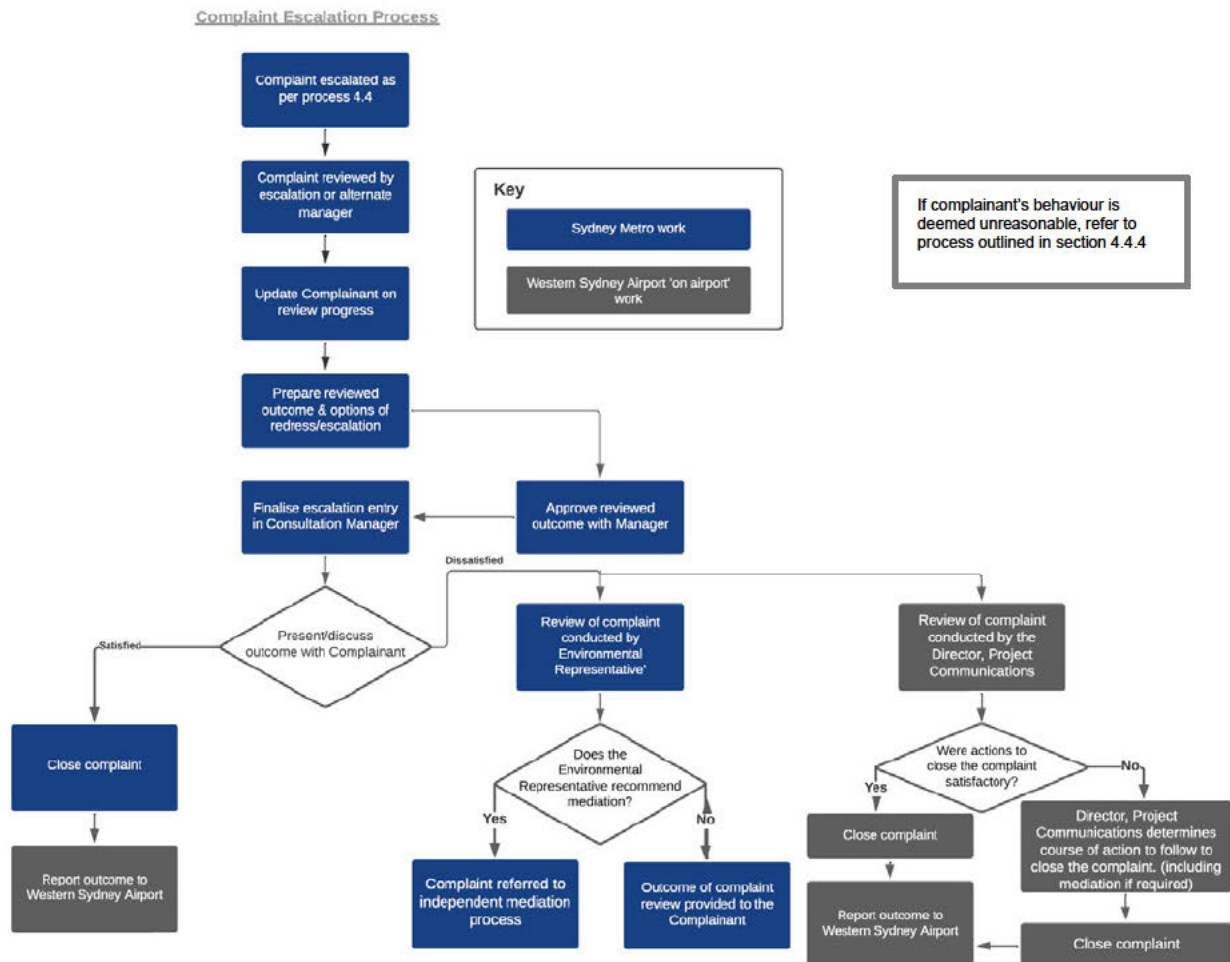
- The complaint cannot be resolved using the procedure in section 4, within a reasonable timeframe
- The nature of the complaint falls into one of the following categories:
 - An activity generates three complaints within a 24-hour period (separate complainants).
 - Any construction site receives three different complaints within a 24-hour period.
 - A single complainant reports three or more complaints within a three day period.
 - A complainant threatens to escalate their issue to the media or government representative.
 - The complaint was avoidable.
 - The complaint relates to a compliance matter.

Complainants will work with Sydney Metro management representatives and any other internal or external subject matter experts with the view to working together to resolve their complaints.

The contractor is required to satisfy Sydney Metro representatives that considerations and recommendations have been implemented and all avenues available to them have been exhausted prior to seeking further escalation.

For on-airport works, if the complainant is dissatisfied with the outcome of their complaint, it will be escalated to the Sydney Metro – Western Sydney Airport Director, Project Communications for review. They will advise if the actions taken to address the complaint are satisfactory or if further action is needed before the complaint can be closed. Sydney Metro will inform Western Sydney Airport of the outcome of the complaint.

5.1.1. How to escalate a complaint



5.2. Role of Environmental Representative

The Environmental Representative will help the contractor and Sydney Metro teams resolve complaints as required, in accordance with this document.

Unresolved complaints may also be escalated to the Environmental Representative for an independent review of the complaint handling process and outcome.

The Environmental Representative would not consider issues such as:

- Property acquisition where other dispute processes are provided for

- Where clear government policy and associated resolution processes are available
- Where the matter is not within the scope of the project.

To undertake an escalated review, the Environmental Representative would:

- Receive a brief from the nominated Sydney Metro complaint management representative
- Review all complaint records
- Review any supporting technical data relating to the complaint – for example noise monitoring information.

The Environmental Representative would assess the adequacy of Sydney Metro's response to the complaint in accordance with this document and the project's planning and assessment process, in consideration of what is fair and reasonable.

Following this review the Environmental Representative would either make a recommendation to close the complaint and notify the Secretary or would provide recommendations for consideration by Sydney Metro on any additional actions that could help resolve the complaint.

The Environmental Representative may also refer any reasonable and unresolved complaint for independent mediation.

5.3. Role of independent mediation

In some circumstances, a complaint may be referred for independent mediation.

The role of independent mediation is to help facilitate communication between parties in conflict to help them reach a voluntary and mutually agreeable outcome to a dispute. It is acknowledged that the role of an independent mediator is to mediate and not arbitrate. A mediator can actively encourage and facilitate discussion to move toward an outcome, but they cannot order or decide an outcome for the parties.

Issues and complaint escalation to independent mediation would be at the recommendation of the Environmental Representative following a thorough review of the complaint information in consideration of the project planning and assessment process.

The Director, Project Communication may also refer a complaint to independent mediation at any point in the complaint management process.

Generally complaints requesting to change an approved project scope of works and/or works operating within project approvals would not be referred for mediation. A complaint would only be referred for mediation once.

An independent mediator would provide information about the mediation process during initial consultation. The process depends on the type of complaint, but may include;

- Establishing expectations about the expected behaviour and involvement of all parties
- Providing guidance, skills transfer and other services to help with any internal escalation mechanism

- Meeting with the complainant, Sydney Metro and the contractor team to understand concerns and help them reach a voluntary and mutually agreeable outcome.
- Seeking guidance from internal and external subject matter experts including, but not limited to, the Environmental Representative and/or the Acoustic Advisor (if required by project approval)
- Providing recommendations or next steps that clearly reflects the input provided by all parties.

Any independent mediator engaged by Sydney Metro would hold suitable qualifications, and have experience in mediating disputes of a similar nature.

In instances where a complainant remains unsatisfied, the Secretary will be advised.

5.3.1. Complaints related to compliance

Where a complaint relates to an actual or potential non-compliance with the planning approvals, Sydney Metro will undertake its own investigation, in accordance with program-wide procedures. This may involve the Environmental Representative. If a non-compliance is identified the details would be communicated to the Department of Planning and Environment (DPE).

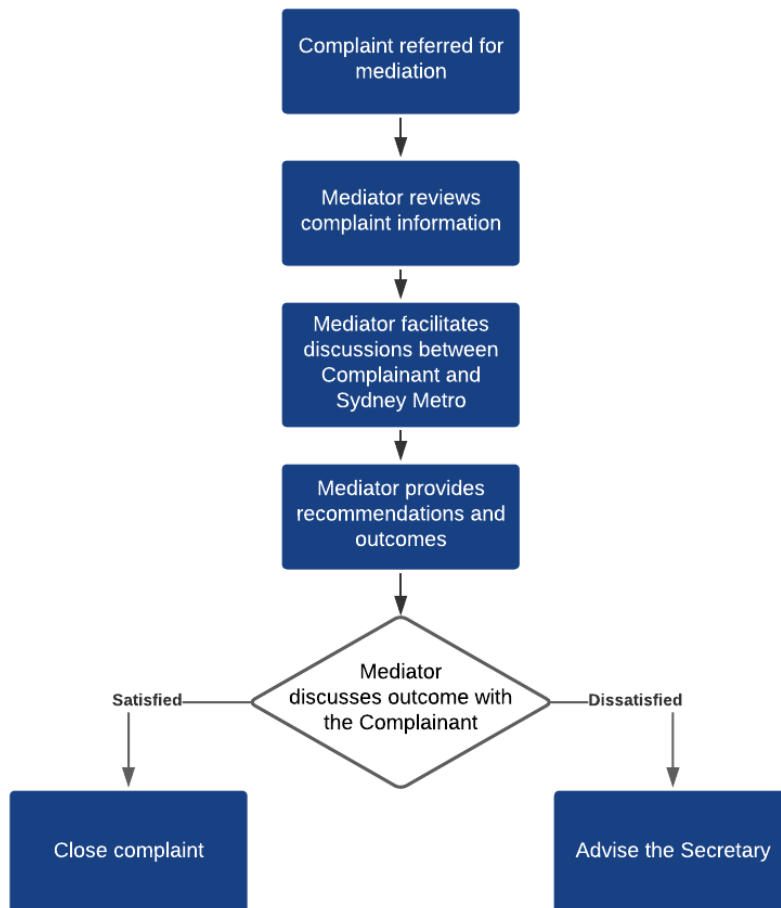
Additionally:

- Where there is a dispute between the Environmental Representative, Sydney Metro and third parties about a non-compliance not being appropriately investigated or managed, Sydney Metro will communicate this to DPE
- Where there is a dispute about the independent complaint review process itself being non-compliant, Sydney Metro will investigate and advise DPE accordingly.

DPIE may undertake its own investigations at its discretion. If DPE receives information from a third party about a potential non-compliance, they may communicate this to Sydney Metro for further investigation.

5.3.2. How to refer a complaint to mediation

Complaints Mediation Process



6. Complaints Register

In accordance with project planning approvals, all complaints must be recorded on a complaints register. For Sydney Metro, complaints are recorded in the community engagement database. The Complaints Register will be provided to the Secretary upon request, within the timeframe stated in the request.

6.1. Complaint identification number

A unique identification number is assigned to each new complaint to help track the complaint in the community engagement database. This number is generated automatically when a new complaint is entered into the database.

6.2. Community engagement database

All complaints must be recorded in the community engagement database in accordance with the data entry procedure. This is necessary so that the complaint can be managed and the response times can be monitored. Contractors should use the template provided by Sydney Metro for data entry into the community engagement database.

7. Reporting on complaints

7.1. Daily reporting to Sydney Metro

Contractors are required to report daily on complaints, providing complaint details for the previous 24 hour period - 12 noon to 12 noon - by 2pm each weekday. A daily complaint report will then be issued to selected Government and Project related representatives. Sydney Metro will provide contractors with advice and guidance about the content of daily complaint reports.

7.2. Reporting to the NSW EPA

Reporting requirements to the NSW Environment Protection Authority (EPA) are outlined in the individual contractors Environment Protection Licences.

Sydney Trains will report annually to the NSW EPA and include any relevant Sydney Metro information about its contractors who have worked under the Sydney Trains Environment Protection Licence during the reporting period.

7.3. Reporting to the DPE

In accordance with project planning approvals, all complaints must be recorded on a complaints register that will be provided to the Secretary upon request, within the timeframe stated in the request.

7.4. Monthly reporting to Sydney Metro

All complaints should be reported on a monthly basis to Sydney Metro. Sydney Metro will provide contractors with details of the minimum reporting requirements.

7.5. Reporting on on-airport works

Sydney Metro will report on complaints received about on-airport works to Western Sydney Airport.



Unit 1/5A Lucca Road
North Wyong NSW 2259
P: 4355 1716
F: 4355 8273

Construction Environmental Management Plan

Project: EWNS

Job No: CO2262

Appendix P – Traffic Control Plans and Permits

The following documents are available as external documents:

- CPAS
- HVLR
- CTMP

Approved by: Syscon

Prepared by: Stuart Watkins

Version: 1.0

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Unit 1/5A Lucca Road
North Wyong NSW 2259
P: 4355 1716
F: 4355 8273

Construction Environmental Management Plan

Project: EWNS

Job No: CO2262

Appendix Q – Unexpected Heritage Finds Procedure

Approved by: Syscon

Prepared by: Stuart Watkins

Version: 1.0

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Sydney Metro Unexpected Heritage Finds Procedure

SM-18-001105232

Metro Body of Knowledge (MBoK)

Applicable to:	Sydney Metro
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System Owner:	Director Environment, Sustainability and Planning
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1. Introduction

1.1. Purpose

This procedure has been prepared to provide a consistent approach to the management of unexpected Aboriginal and non-Aboriginal heritage uncovered during Sydney Metro activities. It applies to all Sydney Metro activities, both the pre-construction (prior to the Construction Heritage Management Plan approval) and construction phase (post Construction Heritage Management Plan approval) and pre or post-approval activities that are subject to the NSW *Heritage Act (1977)* (Heritage Act) and the *National Parks and Wildlife Act 1974* (NPW Act).

In NSW, there are strict laws to protect and manage both Aboriginal and non-Aboriginal heritage. As a result, appropriate management measures need to be implemented to avoid or minimise impacts, ensure compliance with statutory requirements, and to minimise the risk of penalties to individuals, Sydney Metro and its contractors. This procedure includes Sydney Metro's heritage notification obligations under the Heritage Act, NPW Act and the *Coroner's Act 2009* and the requirements of the conditions of approval (CoA) issued by NSW Department of Planning, Industry and Environment.

Note that a Contractor must not amend the *Sydney Metro Unexpected Finds Procedure* or use a different procedure without the prior approval of Sydney Metro.

This procedure must be read in conjunction with the relevant approval conditions, contract documents and other plans and procedures including the *Sydney Metro Exhumation Management Procedure*, in addition to any other relevant documents as developed by the contractor for the delivery of Sydney Metro activities.

1.2. Scope

This procedure applies to the discovery of any unexpected heritage item, where the find is not anticipated in an approved Archaeological Research Design (ARD) or Archaeological Method Statement (AMS) or other project specific document related to heritage. It applies to all Sydney Metro activities.

This procedure must be followed by all Sydney Metro staff, contractors, subcontractors or any person undertaking work for Sydney Metro. It includes references to some of the relevant legislative and regulatory requirements, but is not intended to replace them.

This procedure *does not apply* to:

- the discovery and disturbance of heritage items as a result of investigations being undertaken in accordance with the *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW*^{4376 2010}¹; an Aboriginal Heritage Impact Permit (AHIP) issued under the NPW Act; or a permit approval issued under the Heritage Act;
- the discovery and disturbance of heritage items as a result of construction related activities, where the disturbance is permissible in accordance with an AHIP or an approval issued under the Heritage Act or State Significant Infrastructure (SSI) /State Significant Development (SSD) planning approval; or

- the discovery and disturbance of a heritage item of local significance, where the find is identified and anticipated to occur in an AMS or ARD.

Construction Environment Management Plans (CEMP) should reference or include this procedure. Where there is an approved CEMP, it must be followed in the first instance. Where there is a difference between approved CEMPs and this procedure, the approved CEMP must be followed. Where an approved CEMP does not provide sufficient detail on particular issues, this procedure should be used as a reference.

1.3. Definitions and abbreviations

1.3.1. What is an unexpected heritage find?

An 'unexpected heritage find' can be defined as:

- any unanticipated discovery of an Aboriginal object or archaeological work or relic, which Sydney Metro does not have approval to disturb and/or is not covered under an existing management process or plan
- a find that has not been identified or assessed in a project assessment or document related to heritage
- a find that is not referenced in an archaeological research design (ARD) or archaeological method statement (AMS)
- a find that is not covered by an existing approval under the NPW Act or Heritage Act.

1.3.2. Abbreviations

All terminology in this document is taken to mean the generally accepted or dictionary definition. Other terms and jargon specific to this document are defined within the [SM-17-00000203 Sydney Metro glossary](#). Acronyms specific to this document are listed below.

	Definitions
AHIP	Aboriginal Heritage Impact Permit
Aboriginal object	An Aboriginal object is any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains. An Aboriginal object may include a shell midden, stone tools, bones, rock art, Aboriginal-built fences and stockyards, scarred trees and the remains of fringe camps.
ARD	Archaeological Research Design
AMS	Archaeological Method Statement
CEMP	Construction Environmental Management Plan
CoA	Conditions of Approval
CSSI	Critical State Significant Infrastructure
EP&A Act	NSW <i>Environmental Planning and Assessment Act 1979</i>

Disturbance	Disturbance is considered to be any physical interference to an item that results in it being destroyed, defaced, damaged, harmed, impacted or altered in any way (this includes archaeological investigation activities).
Excavation Director	A person that has been determined by the Heritage Council of NSW or delegate to meet the Criteria for Assessment of Excavation Directors (4 September 2019 and as updated) and can therefore competently archaeologically investigate a site of either local and/or state significance.
Heritage Act	NSW <i>Heritage Act 1977</i>
NPW Act	NSW <i>National Parks and Wildlife Act 1974</i>
Heritage NSW	Formerly Office of Environment and Heritage (OEH). Now Heritage NSW as part of the Department of Premier and Cabinet NSW.
IMS	Integrated Management System (IMS)
Relic (non-Aboriginal heritage)	A relic means any deposit, artefact, object or material evidence that: <ul style="list-style-type: none"> a) relates to the settlement of the area that comprises NSW, not being Aboriginal settlement, and b) is of State or local significance.
SSD	State Significant Development
SSI	State Significant Infrastructure
TfNSW	Transport for New South Wales
Work (non-Aboriginal heritage)	Archaeological features such as historic utilities or buried infrastructure that provide evidence of prior occupations such as former rail or tram track, timber sleepers, kerbing, road pavement, fences, culverts, historic pavement, buried retaining walls, cisterns, conduits, sheds or building foundations, but are also subject to assessment by the Excavation Director to determine its classification.

1.4. Accountabilities

The Director Environment, Sustainability and Planning is accountable for this document including approving the document, monitoring its effectiveness and performing a formal document review.

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

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

2. Types of unexpected heritage finds and their statutory protections

Project, field and environmental personnel (including construction contractors) are critical to the early identification and protection of unexpected heritage finds.

Appendix 1 illustrates the wide range of heritage items uncovered to date during Transport for NSW projects and provides an understanding of what unexpected finds may look like.

Unexpected heritage finds are categorised as either:

- (a) Aboriginal objects;
- (b) Historic (non-Aboriginal) heritage items; or
- (c) Human skeletal remains.

The relevant legislation that applies to each of these categories is described below.

2.1. Aboriginal objects

The NPW Act provides the basis for the care, protection and management of Aboriginal objects and places in NSW.

An Aboriginal object is defined as: *any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.*

An 'Aboriginal place' is an area declared by the Minister administering the Act to be of special significance with respect to Aboriginal culture. An Aboriginal place does not have to contain physical evidence of occupation (such as Aboriginal objects).

Under section 87 of the Act, it is an offence to harm or desecrate an Aboriginal object or place. There are strict liability offences. An offence cannot be upheld where the harm or desecration was authorised by an AHIP and the permit's conditions were not contravened. Defences and exemptions to the offence of harming an Aboriginal object or Aboriginal place are provided in section 87, 87A and 87B of the Act. A person must notify Heritage NSW if a person is aware of the location of an Aboriginal object.

Penalties for some of the offences can include two years imprisonment and/or up to \$550,000 (for individuals), and a maximum penalty of \$1.1 million (for corporations).

Examples of Aboriginal objects include stone artefacts, shell middens, axe grinding grooves, pigment or engraved rock art, burials and scarred trees.

IMPORTANT!

All Aboriginal objects, regardless of significance, are protected under law.

If any impact is expected to an Aboriginal object, an AHIP is usually required from Heritage NSW. When a person becomes aware of an Aboriginal object they must notify the Director-General of Heritage NSW about its location. Assistance on how to do this is provided in section 4 (Step 5).

2.2. Historic (non-Aboriginal) heritage items

The Heritage Act provides for the care, protection and management of heritage items in NSW. Historic (non-Aboriginal) heritage items include:

- archaeological 'relics' as defined under the Heritage Act; and

- other items such as works, buildings or movable objects, which are not considered 'relics' under the Act.

2.2.1. Archaeological relics

Under section 139, it is an offence to disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed, unless the disturbance or excavation is carried out in accordance with an excavation permit issued by Heritage NSW under the Act.

A relic is defined as: *'any deposit, artefact, object or material evidence that: (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and (b) is of State or local heritage significance.'*

A person must notify Heritage NSW, if a person is aware or believes that they have discovered or located a relic (section 146). Penalties for offences under the Heritage Act can include six months imprisonment and/or a fine of up to \$1.1million.

IMPORTANT!

All relics are subject to statutory controls and protection.

If a relic is likely to be disturbed, an approval is usually required from the Heritage Council of NSW. When a person discovers a relic, they must notify the Heritage Council of NSW of its location.

2.2.2. Other items

Some historic heritage items are not considered to be 'relics', but are instead referred to as works, buildings, structures or movable objects. Examples of these items that may be encountered include culverts, historic pavements, retaining walls, tramlines, rail tracks, turn tables, timber sleepers, cisterns, fences, sheds, buildings and conduits.

Usually archaeological relics are uncovered via a process of excavation or soil removal. When an unexpected find is uncovered, an archaeological excavation permit under section 140 or section 60 of the Heritage Act may be required to further investigate or remove it if investigation is not covered by an existing approval. In contrast, 'other historic items' either exist above the ground surface (for example a shed), or they are designed to operate and exist beneath the ground surface (for example a culvert). They may also need a permit to alter, disturb or remove them if there is not an approval already in place.

2.3. Human skeletal remains

The *Sydney Metro Exhumation Management Procedure* provides a more detailed explanation of the approval processes related to human skeletal remains.

Human skeletal remains can be classified as:

- reportable deaths
- Aboriginal objects; or

- relics

Where it is suspected that less than 100 years has elapsed since death, human skeletal remains come under the jurisdiction of the State Coroner and the *Coroners Act 2009* (NSW). Under s35(2) of the Act, a person must report a death to a police officer, a coroner or an assistant coroner as soon as possible. This applies to all human remains less than 100 years old regardless of ancestry. Public health controls may also apply.

Where the remains are suspected of being more than 100 years old, they are considered to be either Aboriginal objects or non-Aboriginal relics, depending on the ancestry of the individual. Aboriginal human remains are protected under the NPW Act, while non-Aboriginal heritage remains are protected under the Heritage Act.

The discovery of Aboriginal human remains also triggers notification requirements to the Commonwealth Minister for the Environment under s20 (1) of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*.

IMPORTANT!

All human skeletal remains are subject to statutory controls and protections.

All bones must be treated as potential human skeletal remains and work around them must stop while they are appropriately protected and investigated, the relevant authorities notified and approvals received.

3. Unexpected heritage finds procedure

In the event that an unexpected find is encountered on a Sydney Metro project, the steps summarised in Figure 1 and detailed in Table 1 must be followed. There are seven steps in the procedure.

IMPORTANT!

Sydney Metro may have approval to impact certain heritage items during construction. If you think that you may have discovered a heritage item and you are unsure whether an approval is in place or not, **STOP** work and follow this procedure.

Figure 1: Summary of steps to be taken on the discovery of an unexpected heritage item

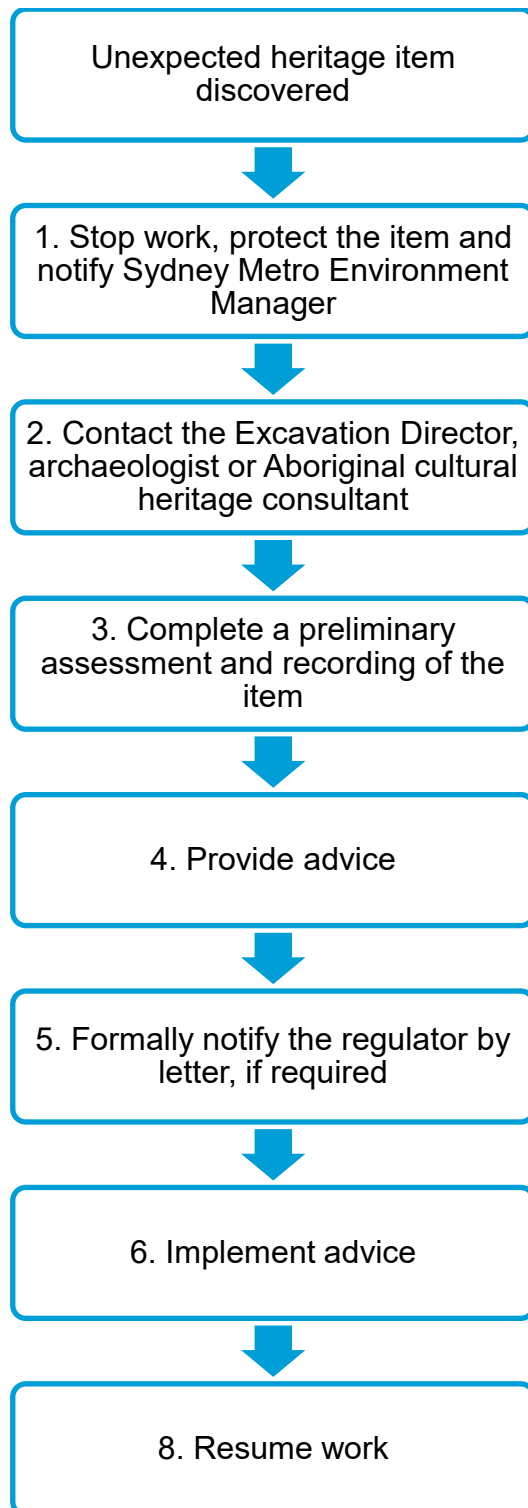


Table 1: Specific tasks to be implemented following the discovery of an unexpected heritage item

Step	Task	Responsibility	Guidance and tools
1	Stop work and protect the item		
1.1	Stop all work in the immediate area of the item and notify the Project Manager	Contractor / Supervisor	Appendix 1 Identifying Unexpected Heritage Items
1.2	<p>Establish a 'no-go zone' around the item. Use high visibility fencing, where practical. No ground disturbing work is to be undertaken within this zone until further archaeological investigations are completed, and if required, appropriate approvals are obtained.</p> <p>Inform all on-site personnel about the no-go zone.</p>	Contractor's Project Manager or Supervisor	
2	Engage an archaeologist		
2.1	<p>Contact the nominated Excavation Director, archaeologist or Aboriginal cultural heritage consultant to discuss the location and nature of the item and arrange an inspection. The project CEMP should contain the contact details of the archaeologist.</p> <p>Provide as much information as possible to the Excavation Director, archaeologist or Aboriginal cultural heritage consultant, including photographs of the item.</p> <p>Inform the Sydney Metro Environment Manager, and keep them involved in the process. The Environment Manager will inform the Sydney Metro Senior Heritage Advisor.</p>	Contractor's Project Manager	
2.2	<p>Where there is no project Excavation Director, archaeologist or Aboriginal cultural heritage consultant engaged for the work, engage a suitably qualified consultant to assess the find.</p> <p>If the find is likely to be an Aboriginal object, engage a suitably qualified and experienced Aboriginal cultural heritage consultant.</p> <p>If the find is a non-Aboriginal heritage item, engage a suitably qualified and experienced historical archaeological consultant.</p>	Contractor's Project Manager	

Step	Task	Responsibility	Guidance and tools
3	Preliminary assessment and recording		
3.1	<p>Occasionally, the Excavation Director, archaeologist or Aboriginal cultural heritage consultant may determine from the photographs provided at Step 2.1 that it is not necessary to inspect the item because no heritage constraint exists for the project (for example the item is not an Aboriginal object or archaeological relic).</p> <p>This advice should be provided in writing (for example via email or letter with the consultant's name and company clearly identifiable) to the Sydney Metro Project Manager, Environment Manager and Senior Heritage Advisor.</p>	Excavation Director, archaeologist or Aboriginal cultural heritage consultant	Proceed to Step 7
3.2	Arrange access for the Excavation Director, archaeologist or Aboriginal cultural heritage consultant to inspect the item as soon as practicable. In most cases, a site inspection is required to conduct a preliminary assessment.	Contractor's Project Manager / Excavation Director	
3.3	<p>Subject to the Excavation Director, archaeologist or Aboriginal cultural heritage consultant's assessment, work may recommence at a set distance from the item. This is to protect any other archaeological evidence that may exist in the vicinity, which may have not yet been uncovered.</p> <p>The 'no-go zone' established in Step 1.2 may need to be adjusted to reflect the area of archaeological potential, as determined by the Excavation Director, archaeologist or Aboriginal cultural heritage consultant.</p>	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
3.4	<p>Has the item been damaged or harmed?</p> <p>If yes, record the incident in the Incident Management System. Implement any additional reporting requirements related to the planning approval and CEMP where relevant</p>	Contractor's Project Manager / Excavation Director, archaeologist or Aboriginal cultural heritage consultant	
3.5	<p>Can the work avoid further impact to the item?</p> <p>Project Manager to confirm with Sydney Metro Environment Manager.</p>	Contractor's Project Manager	

Step	Task	Responsibility	Guidance and tools
3.6	Record the item and complete the Unexpected Heritage Item Recording Form.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant	Appendix 2 Unexpected Heritage Item Recording Form Appendix 3 Photographing Unexpected Heritage Items
3.7	<p>Is the item likely to be bone?</p> <p>If yes, follow the steps in Appendix 4 'Uncovering bones'. Where it is obvious that the bones are human remains, you must notify the local police by telephone immediately. They may take command of all or part of the site. Also refer to the Sydney Metro Exhumation Management Procedure.</p> <p>If no, proceed to the next step.</p>	Excavation Director, archaeologist or Aboriginal cultural heritage consultant	
3.8	<p>The Excavation Director, archaeologist or Aboriginal cultural heritage consultant may provide advice after the inspection and preliminary assessment that no heritage constraint exists for the project (for example the item is not an Aboriginal object or relic).</p> <p>This advice should be provided in writing (for example via email or letter with the consultant's name and company clearly identifiable) to the Sydney Metro Project Manager, Environment Manager and Senior Heritage Advisor.</p>	Excavation Director, archaeologist or Aboriginal cultural heritage consultant	Proceed to Step 7
3.9	Where required, seek additional specialist technical advice (such as a forensic or physical anthropologist to identify skeletal remains). The Excavation Director, archaeologist or Aboriginal cultural heritage consultant can provide contacts for such specialist consultants.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant	
4	Provide advice		
4.1	The Excavation Director, archaeologist or Aboriginal cultural heritage consultant should provide written advice with input from Registered Aboriginal Parties where appropriate. The plan should include as a minimum a) a description of the item, b) an assessment of the significance of the item, c) approval or statutory notification requirements, d) reporting requirements, e) consultation requirements, and f) relevance	Excavation Director, archaeologist or Aboriginal cultural heritage consultant	Appendix 4 Archaeological / heritage advice checklist Other references DECCW 2010, Aboriginal Cultural Heritage Consultation

Step	Task	Responsibility	Guidance and tools
	to other project approvals or management plans.		<p>Requirements for Proponents 2010</p> <p>DECCW 2010, Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW</p> <p>Heritage Branch 2009, Assessing Significance for Historical Archaeological Sites and 'Relics'</p>
4.2	<p>In preparing the advice, the Excavation Director, archaeologist or Aboriginal cultural heritage consultant must review the CEMP, heritage sub-plans, conditions of project approval and associated heritage assessment documentation (for example an Environmental Impact Statement Technical Paper).</p> <p>The Excavation Director, archaeologist or Aboriginal cultural heritage consultant must determine if the item is consistent with previous heritage or project approvals or management plans. The Project Manager must provide all relevant documents to the Excavation Director to assist with this.</p>	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
4.3	The Excavation Director, archaeologist or Aboriginal cultural heritage consultant must submit this advice as a report, letter or email to the Project Manager as soon as practicable.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant	
4.4	The Project Manager, Sydney Metro Environment Manager and Sydney Metro Senior Heritage Advisor should review the advice to ensure that all requirements are addressed and can be reasonably implemented.	Consultant's Project Manager / Sydney Metro Environment Manager / Sydney Metro Senior Heritage Advisor	
5	Notify the regulator, if required		
5.1	<p>Based on the advice and any statutory requirements, is notification to Heritage NSW and the Secretary required?</p> <p>If no, proceed directly to Step 6.</p> <p>If yes, proceed to next step.</p>	Sydney Metro Environment Manager / Sydney Metro Senior Heritage Advisor	

Step	Task	Responsibility	Guidance and tools
5.2	If notification is required, complete the template notification letter and forward with supporting documentation (including advice obtained at Step 4) to the Sydney Metro Environment Manager. The Environment Manager will seek the approval of the Sydney Metro Senior Heritage Advisor and the signature of the Director Project Environment, Sustainability & Planning or Director Environment, Sustainability & Planning	Sydney Metro Environment Manager	Appendix 5 Template Notification Letter
5.3	<p>Forward the signed notification letter to Heritage NSW once approved and cc Sydney Metro.</p> <p>Informal notification (via a phone call or email) to Heritage NSW prior to sending the letter is appropriate.</p> <p>The advice and completed Unexpected Heritage Item Recording Form (Appendix 2) must be submitted with the notification letter (for both Aboriginal objects and non-Aboriginal relics).</p> <p>If the item is an archaeological relic as defined under the Act, a section 146 notification form must also be completed and sent to Heritage NSW as part of the notification.</p>	Sydney Metro Environment Manager	Appendix 2 Unexpected Heritage Item Recording Form Appendix 5 Template Notification Letter
5.4	A copy of the final signed notification letter, archaeological or heritage management plan and the Unexpected Heritage Item Recording Form is to be kept on file and a copy sent to the Sydney Metro Project Manager	Sydney Metro Environment Manager / Contractor's Project Manager	
6	Implement advice		
6.1	The advice should be modified to take into account any additional advice resulting from notification and discussions with the regulator if required.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
6.2	Implement advice. Where impact cannot be avoided, this could include a formal assessment of heritage significance and impact assessment, preparation of excavation or recording methodologies, consultation with Registered Aboriginal Parties and obtaining heritage approvals if required.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	DECCW 2010, Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 DECCW 2010, Code of Practice for the Archaeological Investigation of

Step	Task	Responsibility	Guidance and tools
			Aboriginal Objects in NSW
6.3	Where heritage approvals are required, contact the Sydney Metro Environment Manager for further advice and support. Please note there are time constraints associated with heritage approval preparation and processing.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
6.4	For SSI or SSD projects, or projects approved under Part 5 of the EP&A Act, assess whether the heritage impact is consistent with the project approval or if project approval modification is required from the Department of Planning, Industry and Environment or the relevant consent authority.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
6.5	Where statutory approvals (or project modifications) are required, impact upon Aboriginal objects or relics must not occur until heritage and planning approvals have been issued by the appropriate regulator.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
6.6	Where statutory approval is not required but where recording is recommended by the Excavation Director, archaeologist or Aboriginal cultural heritage consultant, sufficient time and resources must be allowed for this to occur.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
6.7	Ensure short term and permanent storage locations are identified for archaeological material or other heritage material recovered from site, where required. Interested third parties (for example local Aboriginal land councils, local councils or museums) should be consulted on this issue. Contact the Excavation Director, archaeologist or Aboriginal cultural heritage consultant for advice on this issue.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
7	Resume work		
7.1	Seek written clearance to resume project work from the Excavation Director, archaeologist or Aboriginal cultural heritage consultant. Clearance would only be given once all archaeological excavation or heritage recommendations and approvals (where required) are complete. Resumption of	Contractor's Project Manager	

Step	Task	Responsibility	Guidance and tools
	project work must be in accordance with all the relevant project and heritage approvals / determinations.		
7.2	If required, ensure archaeological excavation / heritage reporting and other heritage approval conditions are completed in the required timeframes. This includes artefact retention repositories, conservation and / or disposal strategies.	Excavation Director, archaeologist or Aboriginal cultural heritage consultant / Contractor's Project Manager	
7.3	If additional unexpected heritage items are discovered, this procedure must begin again from Step 1.	All	

4. Responsibilities

Table 2: Roles and responsibilities

Role	Responsibility
Contractor / Supervisor	<p>Stop work immediately when an unexpected heritage item is encountered. Cordon off area until Contractor Environmental Manager / Excavation Director, archaeologist or Aboriginal cultural heritage consultant advises that work can recommence.</p> <p>Manage the process of the identification, protection and mitigation of impacts on the heritage item.</p> <p>Liaise with the Sydney Metro Project Manager, Environment Manager and Senior Heritage Advisor.</p> <p>Assist the Excavation Director, archaeologist or Aboriginal cultural heritage consultant with mitigation and statutory requirements.</p> <p>Complete Incident Report and review CEMP for any changes that may be required. Proposed amendments to the CEMP if any changes are required.</p>
Contractor's Project Manager	<p>Ensure all aspects of this procedure are implemented. Advise the Contractor / Supervisor to recommence work if all applicable requirements have been satisfied and the Contractor Environmental Manager/ Excavation Director, archaeologist or aboriginal cultural heritage consultant has approved recommencement of work.</p>
Contractor's Excavation Director / archaeologist or Aboriginal cultural heritage consultant	<p>Provide expert advice to the Contractor and Sydney Metro Environment Manager on find identification, significance, mitigation, legislative procedures and requirements.</p>
Environmental Representative	<p>Ensure compliance with relevant approvals (new and existing) and the Construction Environment Management Plan.</p>
Sydney Metro Environment Manager	<p>Notify the Director Project Environment, Sustainability & Planning of find and help support Contractor with managing Incident Reporting.</p>
Sydney Metro Senior Heritage Advisor	<p>Provide expert advice to Sydney Metro Environment Manager and project as required.</p>

5. Seeking advice

Advice on this procedure should be sought from the Sydney Metro Environment Manager in the first instance. Contractors and delivery partners should ensure their own project environment managers are aware of and understand this procedure.

Technical archaeological or heritage advice regarding an unexpected heritage item should be sought from a suitably qualified and experienced archaeologist / Aboriginal heritage consultant.

6. Related documents and references

Related documents and references

- SM ES-PW-315/5.0 Sydney Metro Exhumation Management Procedure
- SM-17-00000096 Sydney Metro Environmental Incident Classification and Reporting
- 3TP-SD-015/7.0 Transport for NSW Guide to Environmental Control Map
- Roads and Maritime Services, November 2015, Unexpected Heritage Items Heritage Procedure 02
- [SM-17-00000203 Sydney Metro glossary](#)
- Department of Environment, Climate Change and Water 2010, Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010
- Department of Environment, Climate Change and Water 2010, Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW
- Heritage Branch Department of Planning 2009, Assessing Significance for Historical Archaeological Sites and 'Relics'

7. Superseded documents

Superseded documents

Sydney Metro Unexpected Heritage Finds Procedure v3.3

8. Document history

Version	Date of approval	Notes
1.1	June 2017	Incorporates Environmental Representative comments
1.2		Amends p13 step 8 reference to s146
1.3		Incorporates Planning Mods 1-4 including amended CoA E20
1.4	March 2018	Incorporates Environmental Representative comments
2.0		Removes SSI 15-7400 COA reference
3.0		Revises definitions
3.1		Revises procedure
3.2		Revises roles and responsibilities
3.3		Minor edits and corrections
4.0	April 2021	Revises definitions and procedure; references the Sydney Metro Exhumation Management Procedure v5 with amendments throughout for consistency with that document.
4.1	April 2021	Updates to related documents and references.

Appendix 1: Examples of unexpected heritage finds



Plate 1: Aboriginal stone artefacts found at the Wickham Transport Interchange, 2015



Plate 2: Aboriginal artefacts (shell material) found at the Wickham Transport Interchange, 2015



Plate 3: 1840s seawall and 1880s retaining wall uncovered at Balmain East, 2016



Plate 4: Sandstone pavers uncovered at Balmain East, 2016



Plate 5: Platform at Hamilton Station classified as a 'work' by the project archaeologist, Wickham Transport Interchange project, 2015



Plate 6: Sandstone flagging and cesspit, Wynyard Walk project, 2014



Plate 7: Chinese Ming Dynasty pottery and English porcelain / pottery dating back to the early nineteenth century, Wynyard Walk project, 2014



Plate 8: Pottery made by convict potter Thomas Ball during the early settlement, Wynyard Walk project, 2014

The following images, obtained from the Roads and Maritime Services Unexpected Heritage Items Heritage Procedure 02.



Plate 9: Top left hand picture continuing clockwise: Stock camp remnants (Hume Highway Bypass at Tarcutta); linear archaeological feature with post holes (Hume Highway Duplication), animal bones (Hume Highway Bypass at Woomargama); cut wooden stake; glass jars, bottles, spoon and fork recovered from refuse pit associated with a Newcastle Hotel (Pacific Highway, Adamstown Heights, Newcastle area)

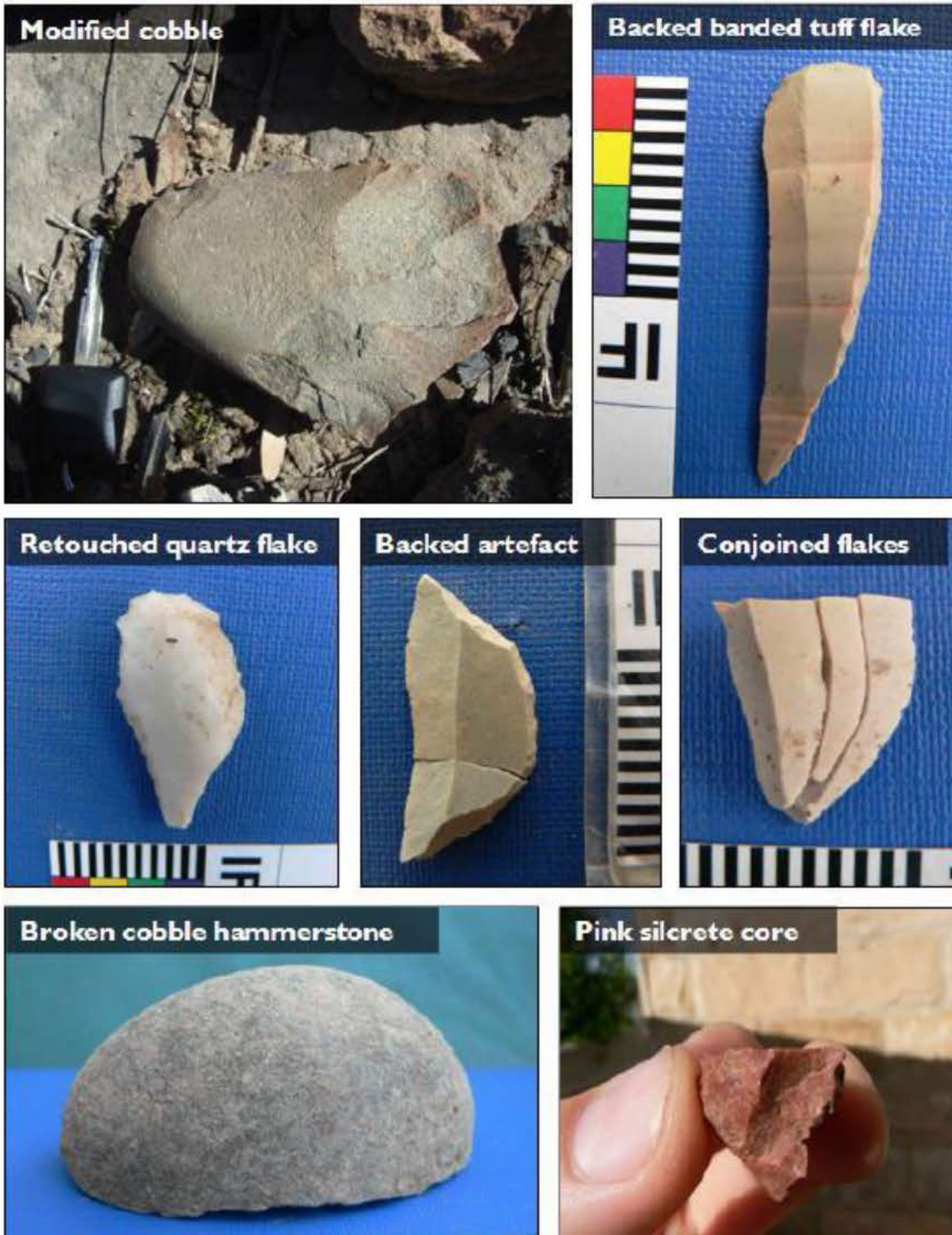


Plate 10: Culturally modified stone discovered on Main Road 92, about two kilometres west of Sassafras. The remaining images shown a selection of stone artefacts retrieved from test and salvage archaeological excavations during the Hume Highway Duplication and Bypass projects from 2006-2010.

Appendix 2: Unexpected Heritage Find Recording Form

This form is to be completed by the Excavation Director on the discovery of an archaeological heritage find during construction or maintenance works

Date:		Recorded by: (include name and position)	
Project name:			
Description of works being undertaken:			
Description of exact location of item			
Description of item found (What type of item is it likely to be? Tick the relevant boxes).			
A. A relic	<input type="checkbox"/>	A 'relic' is evidence of a past human activity relating to the settlement of NSW with local or state heritage significance. A relic might include bottle, utensils, plates, cups, household items, tools, implements, and similar items	
B. A 'work', building or structure	<input type="checkbox"/>	A 'work' can generally be defined as a form infrastructure such as track or rail tracks, timber sleepers, a culvert, road base, a bridge pier, kerbing, and similar items	
C. An Aboriginal object	<input type="checkbox"/>	An 'Aboriginal object' may include stone tools, stone flakes, shell middens, rock art, scarred trees and human bones	
D. Bone	<input type="checkbox"/>	Bones can either be human or animal remains. Remember that you must contact the local police immediately by telephone if you are certain that the bone(s) are human remains.	
E. Other	<input type="checkbox"/>		
Provide a short description of the item (E.g. metal rail tracks running parallel to the rail corridor. Good condition. Tracks set in concrete, approximately 10 cm below the current ground surface).			

Sketch <i>(Provide a sketch of the item's general location in relation to other road features so its approximate location can be mapped without having to re-excavate it. In addition, please include details of the location and direction of any photographs of the item taken)</i>			
Action taken (Tick either A or B)			
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> A. Unexpected item would not be further impacted on by the works </div> <div style="width: 5%; text-align: center;"> <input type="checkbox"/> </div> <div style="width: 65%;"> Describe how works would avoid impact on the item. <i>(E.g. the rail tracks would be left in situ and recovered with paving).</i> </div> </div>			
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> B. Unexpected item would be further impacted by the works </div> <div style="width: 5%; text-align: center;"> <input type="checkbox"/> </div> <div style="width: 65%;"> Describe how works would impact on the item. <i>(E.g. milling is required to be continued to a depth of 200 mm depth to ensure the pavement requirements are met. Rail tracks would need to be removed.)</i> </div> </div>			
Excavation Director, archaeologist or Aboriginal cultural heritage consultant		Name	
		Signature	

IMPORTANT

It is a statutory offence to disturb Aboriginal objects or relics (including human remains) without an approval. All work affecting Aboriginal objects and relics must cease until an approval is sought.

Appendix 3: Photographing unexpected heritage items

Photographs of unexpected finds in their current context (*in situ*) may assist archaeologists/Aboriginal heritage consultants to better identify the heritage values of the item. Emailing good quality photographs to specialists can allow for better quality and faster heritage advice. The key elements that must be captured in photographs of the item include its position, the item itself and any distinguishing features. All photographs must have a scale (ruler, scale bar, mobile phone, coin etc.) and a note describing the direction of the photograph.

Context and detailed photographs

It is important to take a general photograph (Figure 1) to convey the location and setting of the item. This will add value to the subsequent detailed photographs also required (Figure 2).

Removal of the item from its context (e.g. excavating from the ground) for photographic purposes is not permitted.

Photographing distinguishing features



Figure 2: Close up detail of the sandstone surface showing material type, formation and construction detail. This is essential for establishing date of the feature.

Where unexpected items have a distinguishing feature, close up detailed photographs must be taken of these features, where practicable. In the case of a building or bridge, this may include diagnostic details architectural or technical features. See Figures 3 and 4 for examples.



Figure 3: Ceramic bottle artefact with stamp.



Figure 4: Detail of the stamp allows 'Tooth & Co Limited' to be made out. This is helpful to a specialist in gauging the artefact's origin, manufacturing date and likely significance.

Photographing bones

The majority of bones found on site will be animal bones often requiring no further assessment (unless they are in archaeological context). However, if bones are human, the police must be contacted immediately (see Appendix 5 for detailed guidance). Taking quality photographs of the bones can often resolve this issue quickly. The project archaeologist can confirm if bones are human or non-human if provided with appropriate photographs.

Ensure that photographs of bones are not concealed by foliage (Figure 5) as this makes it difficult to identify. Minor hand removal of foliage can be undertaken as long as disturbance of the bone does not occur. Excavation of the ground to remove bone(s) should not occur, nor should they be pulled out of the ground if partially exposed.

Where sediment (adhering to a bone found on the ground surface) conceals portions of a bone (Figure 6) ensure the photograph is taken of the bone (if any) that is not concealed by sediment.



Figure 5: Bone concealed by foliage.



Figure 6: Bone covered in sediment

Ensure that all close up photographs include the whole bone and then specific details of the bone (especially the ends of long bones, the *epiphysis*, which is critical for species identification). Figures 7 and 8 are examples of good photographs of bones that can easily

be identified from the photograph alone. They show sufficient detail of the complete bone and the epiphysis.



Figure 7: Photograph showing complete bone.



Figure 8: Close up of a long bone's epiphysis.

Appendix 4: Archaeological / heritage advice checklist

The archaeologist/Aboriginal heritage consultant must provide advice to the Sydney Metro Environment Manager and Senior Advisor Heritage as soon as possible after an inspection of the site has been completed. This advice can include a range of activities and processes, which differ depending on the find and its significance.

In discussions with the archaeologist/Aboriginal heritage consultant the following checklist can be used as a prompt to ensure all relevant heritage issues are considered when developing this plan. This will allow the project team to receive clear and full advice to move forward quickly. Archaeological and/or heritage advice on how to proceed can be received in a letter or email outlining all relevant archaeological and/or heritage issues.

	Required	Outcome/notes
Assessment and investigation		
• Assessment of significance	Yes/No	
• Assessment of heritage impact	Yes/No	
• Archaeological excavation	Yes/No	
• Archival photographic recording	Yes/No	
Heritage approvals and notifications		
• AHIP, section 140, section 139 exceptions, section 60, exemptions etc.	Yes/No	
• Regulator Aboriginal objects / relics notification	Yes/No	
• Notification to the appropriate agency for s170 heritage conservation register	Yes/No	
• Compliance with CEMP or other project heritage approvals	Yes/No	
Stakeholder consultation		
• Consultation with Registered Aboriginal Parties	Yes/No	
Management		
• Retention or conservation strategy (e.g. items may be subject to long conservation and interpretation)	Yes/No	
• Disposal strategy	Yes/No	
• Short term and permanent storage locations (interested third parties should be consulted on this issue).	Yes/No	
• Control Agreement for Aboriginal objects	Yes/No	

Appendix 5: Template notification letter

Note: Notification of the discovery of a relic is required under section 146 of the Heritage Act 1977. The notification should be submitted through the Heritage Management System (HMS).

Insert on Sydney Metro letterhead

[Name]

Heritage NSW

[Address]

[Select and type salutation and name],

Re: Unexpected heritage item discovered during Sydney Metro activities

I write to inform you of an unexpected [select: Aboriginal object / relic] found during Sydney Metro activities at [insert location] on [insert date] in accordance with the notification requirement under select: [NPW Act, section 146 of the *Heritage Act 1977* (NSW)]. [Where the regulator has been informally notified at an earlier date by telephone, this should be referred to here].

NB: On finding Aboriginal human skeletal remains this letter must also be sent to the Commonwealth Minister for the Environment in accordance with notification requirements under section 20(1) of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Commonwealth).

[Provide a brief overview of the project background and project area. Provide a summary of the description and location of the item, including a map and image where possible. Also include how the project was assessed under the *Environmental Planning and Assessment Act 1979* (NSW) (e.g. Part 5). Also include any project approval number, if available].

Sydney Metro [or contractor] has sought professional archaeological advice regarding the item. A preliminary assessment indicates [provide a summary description and likely significance of the item]. Please find additional information on the site recording form attached.

Based on the preliminary findings, Sydney Metro [or contractor] is proposing [provide a summary of the proposed archaeological/heritage approach (e.g. develop archaeological research design (where relevant), seek heritage approvals, undertake archaeological investigation or conservation, interpretation). Also include preliminary justification of such heritage impact with regard to project design constraints and delivery program].

The proposed approach will be further developed in consultation with a nominated Heritage NSW staff member.

Should you have any feedback on the proposed approach, or if you require any further information, please do not hesitate to contact [Environment and Planning Project Manager] on [add contact number].

Yours sincerely

[Name]

Sydney Metro Director, Environment, Sustainability & Planning

[Attach the advice from the Excavation Director, archaeologist or Aboriginal cultural heritage consultant, completed recording form and section 146 notification]

Appendix R – Unexpected Contaminated Land and Asbestos Finds Procedure

1. Stop Work
 - Immediately cease all work in the affected area.
 - Isolate the area to prevent access by personnel and plant.
 - Do not disturb the material further.
2. Notify
 - Notify the Site Supervisor immediately.
 - The Site Supervisor must inform the Environmental Manager and Project Manager.
 - If asbestos is suspected, notify the HSEQ Manager and engage a licensed asbestos assessor if required.
 - Initial Assessment
 - The Environmental Manager will inspect the material and assess whether it is potentially contaminated or asbestos-containing.
 - If necessary, arrange for sampling and laboratory testing by a suitably qualified environmental consultant.
3. Management and Reporting
 - If contamination or asbestos is confirmed:
 - Implement appropriate containment and control measures (e.g. wetting, covering, signage).
 - Manage removal and disposal in accordance with relevant legislation, EPA guidelines, and SafeWork NSW requirements.
 - Record the incident and actions taken in the Environmental Incident Register.
 - Notify the Sydney Metro Environment Team and regulators if required under approval conditions or licence obligations.
4. Resumption of Work
 - Work may only recommence once:
 - The area has been assessed as safe.
 - Clearance has been provided by the Environmental Manager and, where relevant, the licensed asbestos assessor.

References

NSW Work Health and Safety Regulation 2017 (Part 8.7 – Asbestos)

Contaminated Land Management Act 1997

EPA Waste Classification Guidelines

SafeWork NSW – *How to Safely Remove Asbestos* Code of Practice



Unit 1/5A Lucca Road
North Wyong NSW 2259
P: 4355 1716
F: 4355 8273

Construction Environmental Management Plan

Project: EWNS

Job No: CO2262

Appendix S – Sydney Metro Environmental Incident and NC Reporting Procedure & Incident Reporting Form

Approved by: Syscon

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Procedure - Environmental Incident and Non-Compliance Reporting

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1. Introduction

1.1. Who and when is this document for?

The Environmental Incident Classification and Reporting Procedure (the Procedure) applies to:

Sydney Metro	YES
Contractors (construction / operations)	YES (as per contractual obligation)

In Sydney Metro this Procedure applies to permanent, temporary and casual staff; staff seconded from another organisation; and contingent workers including labour hire, professional services contractors and consultants performing work on behalf of Sydney Metro. Contractors must ensure their processes for managing environmental events are consistent with this document.

The Procedure applies to the following stage/s of the project lifecycle, as described section 1 of [SM-23-00895405 Environmental Management System Framework](#)

Needs confirmation	NO
Needs analysis	NO
Investment decision	NO
Procurement	NO
Delivery	YES
Operational readiness	YES
Operations	YES

1.2. Accountabilities

The Head of Technical Services is accountable for approving this Procedure.

The Executive Director, Environment Sustainability and Planning is accountable for this Procedure, including monitoring its effectiveness and performing a formal document review.

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

Project delivery staff are responsible for ensuring that all incidents and non-compliances are reported in Evotix according to this procedure and any actions closed out in the nominated time frames. All Sydney Metro staff with responsibilities for reporting or managing environmental events are responsible for following this procedure.

1.3. Delegations

All activities undertaken by Sydney Metro in accordance with the requirements of this Procedure and which are necessarily carried out under delegated authority, must comply with the latest version of the [SM-23-00020402 Sydney Metro General Delegations Schedule](#).

1.4. Legislative and planning approval obligations

Nothing in this Procedure overrides or replaces obligations in relevant legislation that are required to be followed in respect of incidents.

In addition to any requirements specified in this Procedure, incident reporting must also be undertaken in accordance with the relevant planning approval, and all applicable permits, licences and legislation.

1.5. Approved communication platforms

All communications with regulators in relation to incidents must be done in the manner specified by the regulator.

All electronic communications undertaken in accordance with the requirements of this Procedure must be undertaken through email, TeamBinder, Microsoft Teams, Evotix or other authorised system.

For Sydney Metro staff all electronic communication must be in accordance with [SM-24-00162903 Information Management Local Business Rules](#). These rules provide specific information on the Sydney Metro approved systems as well as the requirements for protecting, storing and retaining records created, accessed and used as part of Sydney Metro's work, including email correspondence.

1.6. Purpose

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

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

This Procedure documents the process to be used for identifying, notifying, classifying, reporting and responding to environmental events. It is one of Sydney Metro's key environmental assurance processes to ensure that requirements under planning approval conditions, mitigation measures, commitments and legislative obligations are met. Compliance with contractual requirements is managed in accordance with [SM-19-00048239 Requirements Management Procedure](#)

For Sydney Metro staff, further information about Sydney Metro's suite of environment, sustainability and planning (ESP) assurance processes are described in [SM-23-00895407 Environment, Sustainability and Planning Assurance Standard](#) and [SM-17-00000022 Environment and Sustainability Manual](#). These documents are part of the Sydney Metro Environmental Management System (EMS), which is further described in the [SM-23-00895405 Environmental Management System Framework](#)

This Procedure supports the [TfNSW Environment and Sustainability Policy](#), the [TfNSW Net Zero and Climate Change Policy](#), the [TfNSW Biodiversity Policy](#) and the [Sydney Metro Environment and Sustainability Statement of Commitment](#). This Procedure is part of the Environment element within the EMS. The [SM-17-00000022 Environment and Sustainability Manual](#) describes how the Environment element functions within the broader EMS framework.

2. Definitions

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

Table 1 Definitions

Term	Definition
Environment	means components of the earth, including: a) land, air and water, and b) any layer of the atmosphere, and c) any organic or inorganic matter and any living organism, and d) human-made or modified structures and areas, and includes interacting natural ecosystems that include components referred to in (a)-(c).
Environmental Event	An occurrence that identifies actual or potential environmental impacts or non-compliances. Events can include conversations, inspections, incidents, or failures of process.
Environmental Harm	Includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.
Environmental Incident	An occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred or is likely to have occurred.
Environmental Issue	An occurrence or set of circumstances where Environmental Harm or Non-compliance could occur if not rectified.
Environmental Non-compliance	A breach of an Environmental Requirement originating from Planning Approvals, Environment Protection Licences, lease agreements, and other requirements documented in environmental management plans.
Material Harm to the Environment	harm to the environment is material if: a) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or b) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and c) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment. It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Terms specific to this procedure are defined within [SM-17-00000203 Sydney Metro Glossary](#).

2.1. Legal and policy context

Table 2: Key legislation dealing with the management of environmental and sustainability matters

Key Legislation	Jurisdiction
Biodiversity Conservation Act 2016	NSW
Climate Change (Net Zero Future) Act 2023	NSW
Contaminated Land Management Act 1997	NSW
Environmental Planning and Assessment (EP&A) Act 1979	NSW
Environmental Planning and Assessment Regulation 2021	NSW
Heritage Act 1977	NSW
National Parks and Wildlife Act 1974	NSW
Protection of the Environment Operations (POEO) Act 1997	NSW
Protection of the Environment Operations (POEO) (General) Regulation 2022	NSW
Protection of the Environment Operations (POEO) (Clean Air) Regulation 2022	NSW
Protection of the Environment Operations (POEO) (Noise Control) Regulation 2017	NSW
Protection of the Environment Operations (POEO) (Waste) Regulation 2014	NSW
Roads Act 1993	NSW
Water Management Act 2000	NSW
Airports Act 1996	Commonwealth
Environment Protection and Biodiversity Conservation Act 1999	Commonwealth

2.2. Environmental compliance management system (Evotix)

Sydney Metro's Environmental Compliance Management System Evotix is used to track, manage and record compliance with statutory requirements across all Sydney Metro projects.

Information in Evotix is used:

- for internal and external performance reporting to analyse environmental performance trends
- to provide assurance that environmental and sustainability requirements arising from planning Conditions of Approval (CoA's) and Revised Environmental Mitigation Measures (REMM's) are being met; and
- to inform surveillance activities and training needs.

Evotix is accessible to internal users [here](#) and external users [here](#). Evotix access requests and enquiries are to be directed to SydneyMetroEvotixSupport@transport.nsw.gov.au.

3. Environmental Events

Environmental surveillance data is relied upon to inform Sydney Metro of performance trends, to provide assurance that legislative requirements are being met and indicate where surveillance activities should be directed. In order to rely upon environmental data for this purpose there needs

to be a high degree of consistency in the manner by which it is collected and interpreted. Due to the need for consistency, any incident/Non-compliance procedure produced by a delivery partner to Sydney Metro is required to be consistent with the requirements of this document.

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

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

Incidents and Non-compliances are recorded using [SM-17-00000105 Environmental Incident and Non-compliance Notification Report Form](#) and Environmental Issues are recorded through environmental inspection reports using [SM-17-00000107 Environmental Inspection Report Template](#). These paper-based records are subsequently entered into the Sydney Metro Environmental Compliance Management System, Evotix (Section 2.2) which is used to disseminate the data and facilities reporting internally and externally. Note where a Principal Contractor has submitted alternative processes, and these have been approved by Sydney Metro they may also be used.

Figure 1 below shows the process by which Environmental Events are classified.

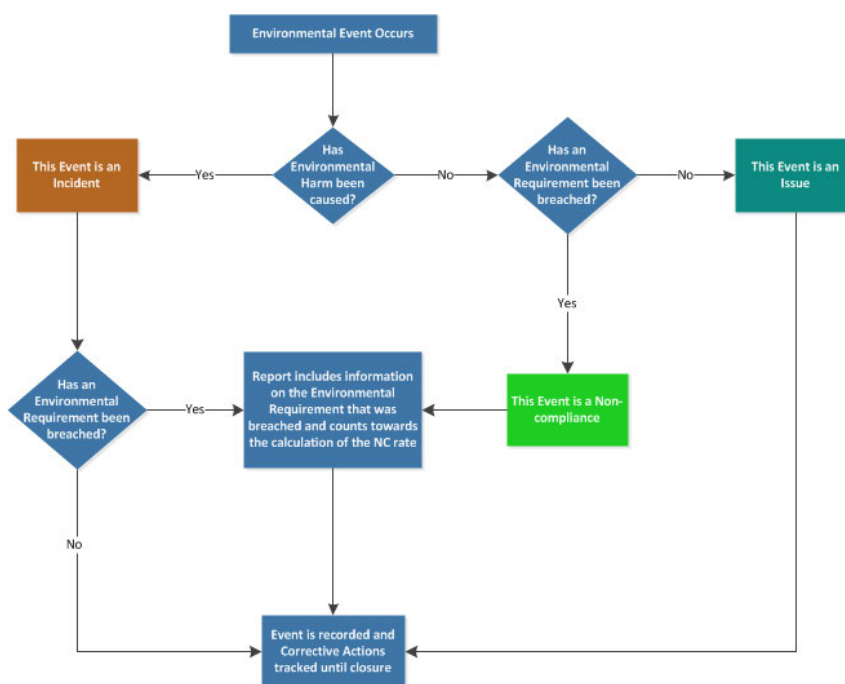


Figure 1: Environmental Event Classification Process

Where Environmental Harm has been caused the event will always be classified as an Environmental Incident regardless of whether one or more Environmental Requirements have been breached. Only when an event occurs without harm being caused to the environment will it be classified as a Non-compliance or Issue. It should be noted that the Incident management process still captures any breaches of Environmental Requirements, and these incidents contribute towards the calculation of the NC Rate (Section 5.1).

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

3.1. Worked Example – Classifying Environmental Events

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

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

3.1.1. Soil and Water Issue

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

3.1.2. Soil and Water Non-compliance

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

3.1.3. Soil and Water Incident

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

3.2. Notifiable Events

There are a number of Acts and regulations that include a specific requirement to notify a Regulatory Authority. When an Environmental Event triggers one of these notification requirements we then also refer to that event as a Notifiable Event (Table 3).

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

Table 3: Examples of Notifiable Events

Event type	Legislation		Trigger for Notification
Pollution Incident ¹	POEO Act 1997	Part 5.7	Where Material Harm has occurred contact the Environment Protection Authority (EPA) Pollution Line as soon as practicable
	POEO (General) Regulation 2022	Section 101	
Land contamination	Contaminated Land Management Act 1997	Section 60(1)	As soon as practicable, after becoming aware of contamination that exceeds the relevant investigation levels in the National Environment Protection Measure, where a person has or will be exposed to the contamination
Discovery of an Aboriginal relic	National Parks & Wildlife Act 1974	Section 89A	Director General of EPA in writing within a reasonable time after becoming aware. Note this is not required for Projects approved under Part 5.2 of the Environmental Planning and Assessment Act (see section 115ZG). Notification and reporting is addressed in the relevant Infrastructure Approval
Discover Aboriginal Remains	Commonwealth Aboriginal & Torres Strait Islanders Heritage Protection Act 1984	Section 20	Commonwealth Minister of the Environment in writing as soon as practicable after becoming aware
Discovery of a relic	Heritage Act 1977	Section 146	Heritage Council in writing within a reasonable time after becoming aware Note -this is not required for Projects approved under Part 5.2 of the Environmental Planning and Assessment Act (see section 115ZG). Notification and reporting is addressed in Infrastructure Approvals

3.3. Event Types

Each Environmental Event is assigned a secondary classification of an Event Type for the purpose of data analysis and general environmental management. They are grouped by areas of environmental management so that targeted auditing, training or awareness initiatives can be initiated in response to emergent trends. Each Event Type is explained in Table 4.

¹ Further information on reporting pollution incidents to EPA is provided in Section 4.6 Environmental Incident/Non-compliance Report

Table 4: Environmental Event Types and their descriptions

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

4. Environmental Incident Classification and Management

Sydney Metro has defined an Environmental Incident as:

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

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

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

Table 5: Examples of Environmental Incidents

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

4.1. Incident Classification

Environmental Incidents are classified into one of three Classes that are based upon the consequence descriptors for environmental risks in the Sydney Metro Risk Matrix (refer to [SM-17-00000182 Risk Management Standard](#)). Each of these classifications trigger a variety of management actions and/or legislative requirements depending on the severity of the consequence described where Class 3 represents minor consequences and Class 1 represents major consequences.

This matrix is further sub-divided into consequence ratings ranging from C6 (low impact) to C1 (high impact). An incident transitions between a Class 3 to a Class 2 incident once material harm has been caused, and transitions into a Class 1 incident once it is determined that the Environmental Harm caused is large-scale and cannot be remediated (Table 6).

Table 6: Classification System for Environmental Incidents

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

4.1.1. Class 3 Incidents

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

In some cases it will be unclear whether Material Harm has been caused in the early stages of Incident Management. If this is the case, then the process for Class 2 Incidents is followed (see Section 4.1.2) until it is clear that Material Harm has not been caused.

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

4.1.2. Class 2 Incidents

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

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

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

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

4.1.3. Class 1 Incidents

Class 1 Environmental Incidents are managed in the same manner as Class 2 Incidents except where a determination is made by the Chief Executive (or delegate) that a Crisis Management Team should be activated. In this situation [SM-19-00053243 Crisis Management Procedure](#) is followed.

4.2. Incident Notification

When an Environmental Event occurs which causes Environmental Harm in all cases both verbal and written communication of the incident must be carried out immediately and within 48 hours respectively. For Class 1 and 2 Incidents the notification process shown in Figure 2 must be followed. Written communication of Environmental Incidents is via an Incident Notification Report (Section 4.3).

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

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

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

4.2.1. Principal's Representative (PR)

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

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

4.2.2. Environmental Lead (EL)

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

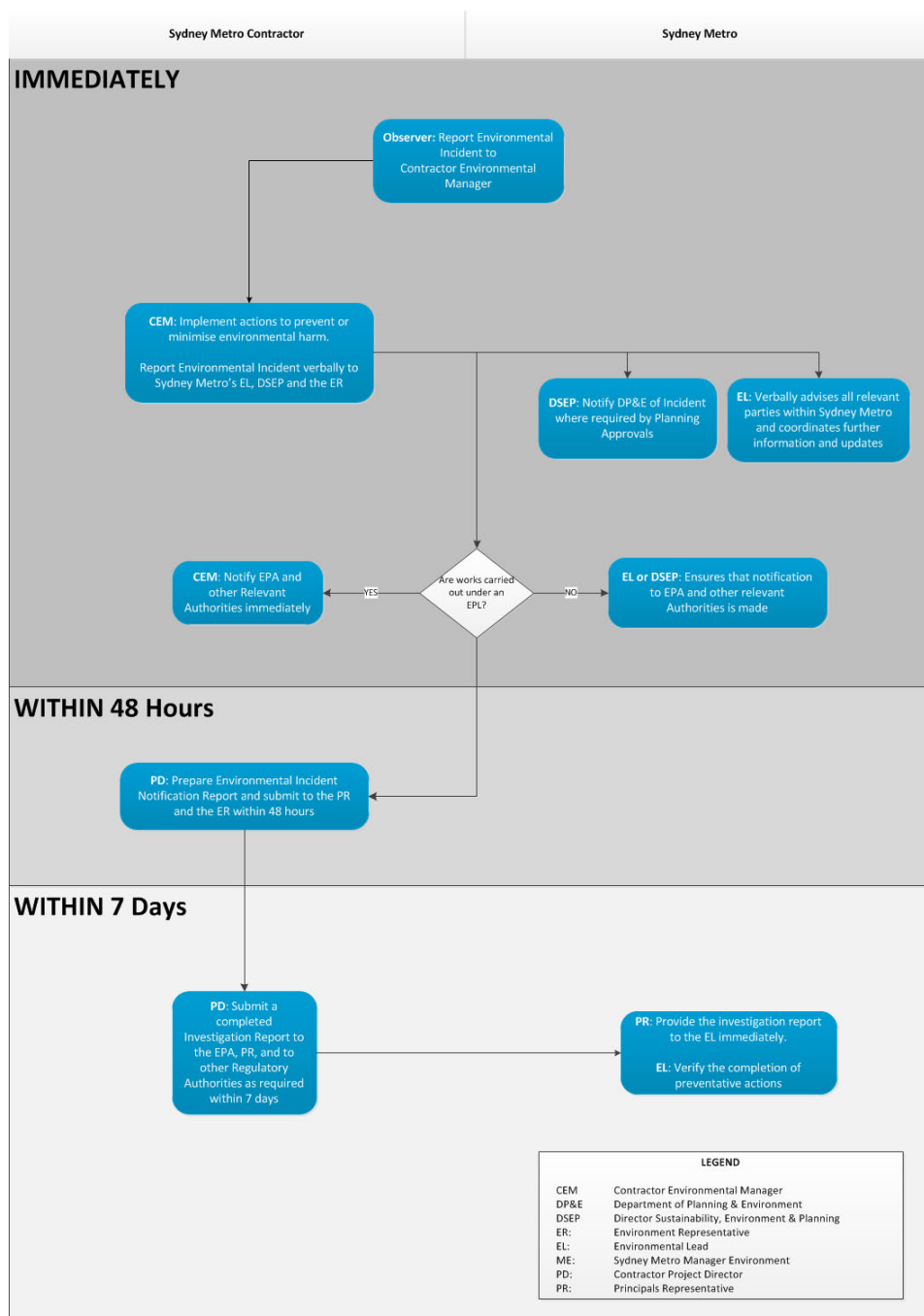


Figure 2: Environment Incident notification process for Class 1 and 2 Incidents

4.3. Incident Notification Reports

For all Incidents an Incident Notification Report must be completed and submitted to Sydney Metro within 48 hours. These reports satisfy the requirement for written communication to Sydney Metro and are completed using [SM-17-00000105 Environmental Incident and Non-compliance Notification Report Form](#) or a similar and consistent form approved by Sydney Metro.

4.4. Incident Investigations

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

When conducting an Environmental Incident investigation, they must:

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

4.5. Environmental Incidents with Health and Safety Impacts

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

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

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

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

4.6. Reporting Pollution Incidents to Relevant Authorities

If an Incident or Non-compliance is a Notifiable Event, then a report must be provided to the relevant Regulatory Authority within the timeframe(s) specified by the relevant legislation. Pollution Incidents which are causing or threatening Material Harm to the environment must be

reported to each of the following authorities immediately after project personnel become aware of the Incident, as required by Section 148 of the POEO Act 1997. The contact numbers for these authorities are listed in Table 7.

Table 7: Contact details for Relevant Authorities

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

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

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

All relevant information known at the time of making the notification must be reported. If the information required by (c), (d) or (e) above is not known at the time of initial notification but becomes known afterwards, it must be reported to each authority immediately after it becomes known. Verbal notification must be followed by notification in writing within seven days of the date on which the Incident occurred.

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

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

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

For any work or activity that is not regulated by an EPL, notification of pollution Incidents to EPA shall be made by Sydney Metro, unless the contractor is instructed otherwise by Sydney Metro. This includes pollution Incidents that occur as a result of pre-construction activities which may be

undertaken prior to an EPL being required for a project. Pre- construction activities are determined by the Planning Approval and may include, for example, geotechnical investigations or surveys.

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

4.6.1. Maritime Related Incident Notification and Reporting

Marine Incidents involving vessels and personnel on board vessels must be reported to the Australian Maritime Safety Authority in accordance with the guidance published on their [website](#).

5. Environmental Non-compliance

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

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

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

If a Non-compliance is identified then it must be raised using [SM-17-00000105 Environmental Incident and Non-compliance Notification Report Form](#) within 48 hours by the party responsible for the breach.

5.1. Non-compliance Rate

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

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

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

6. Corrective and Preventative Actions

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

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

Actions must:

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

The Executive Director, Environment, Sustainability and Planning must ensure there are systems in place to:

- Monitor corrective action status
- Escalate issues to the executive where progress on a corrective action is inadequate; and
- Retain all corrective action responses for recording purposes.

6.1. Action Status

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

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

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

7. Related documents and references

Related documents and references

- [SM-17-00000022 Environmental & Sustainability Management Manual](#)
- [SM-17-00000182 Risk Management Standard](#)
- [SM-17-00000040 Incident Management Standard](#)
- [SM-19-00053243 Crisis Management Procedure](#)
- [SM-17-00000105 Environmental Incident and Non-compliance Notification Report Form](#)
- [SM-17-00000107 Environmental Inspection Report Template](#)
- [SM-17-00000203 Sydney Metro Glossary](#)

8. Superseded documents

Superseded documents

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

9. Document history

Version	Date of approval	Notes
1.0	31 March 2015	New document
2.0	7 July 2016	IMS Review
3.0	7 April 2017	IMS Review
4.0	23 November 2018	IMS Review
5.0	11 February 2019	IMS Review
5.1	18 February 2019	Minor correction to formula
5.2	20 August 2025	Minor update to new template and to update departmental names and role descriptions

Environmental Incident & Non-compliance Notification Report

This Environmental Incident and Non-compliance Notification Report supports the [SM-17-00000096 Environmental Incident and Non-compliance Reporting Procedure](#), which is part of the Sydney Metro Environmental Management System (EMS). The EMS is described in the [SM-23-00895405 Environmental Management System Framework](#).

This form is to be completed by Sydney Metro Contractors to report environmental incident and non-compliance events in accordance with [SM-17-00000096 Environmental Incident and Non-compliance Reporting Procedure](#).

Record only factual information that you know to be correct. Do not make assumptions, be succinct and avoid speculation.

Section 1: General details			
Contractor			
Site			
Sydney Metro ID Code (If known)		Contractor Reference ID (If known)	
Event type (select both if the event is both an incident and non-compliance)	<input type="checkbox"/> Incident (Complete sections 2 - 4)	<input type="checkbox"/> Non-compliance (Complete sections 2, 3 & 5)	

Section 2: Event details			
Date of incident or non-compliance		Time of incident or non-compliance	

OFFICIAL

Date contractor became aware of incident or non-compliance		Non-compliance completion date (where applicable)	
Date of notification to Sydney Metro		Time of notification to Sydney Metro	
Method of notification			
Notification received by: (Name)			
Notification received by: (Position)			
Date of notification to NSW Planning:			

Section 3: Event type (choose one)		
<input type="checkbox"/> Air Quality (e.g. dust or odour emission, excessive exhaust from plant or equipment)	<input type="checkbox"/> Heritage (e.g. damage/disturbance to heritage item/object/place)	<input type="checkbox"/> Noise & Vibration (e.g. exceedances of noise and vibration limits)
<input type="checkbox"/> Flora and Fauna (damage/harm to species /habitat/ecological community)	<input type="checkbox"/> Spills and Leaks (e.g. escape of fluids from containers)	<input type="checkbox"/> Traffic, Transport & Access (e.g. Issues regarding the management of traffic flow)
<input type="checkbox"/> Soil and Water (events where harmful materials escape into soil or discharge to any onsite or offsite waterway)	<input type="checkbox"/> Community, Stakeholder and Business (e.g. events causing impacts on community amenity/property)	<input type="checkbox"/> Waste & Spoil (e.g. disposal causing environmental harm or improper stockpile management)
<input type="checkbox"/> Management Systems (e.g. Non-Compliance with project approval, or a CEMP requirement)		

Section 4: Environmental incident

Incident details

Incident Classification

☐ Class 3

☐ Class 2

☐ Class 1

Probable Impact Duration

☐ Short term
(< 1 week)

☐ Medium term
(< 3 months)

☐ Long term
(>3 months)

☐ Permanent

Is the incident notifiable?

(Where significant off-site impacts on people or the biophysical environment occurs this incident is also notifiable to DPHI)

☐ Yes

☐ No

Incident: Circumstances and corrective actions

Exact location

(address, chainage, nearest cross street, landmarks etc., attach sketch if appropriate.)

Circumstances

(Outline the circumstances of the Incident leading up to the event and detail the activity being conducted)

Corrective actions

(Actions taken immediately to address the cause of environmental harm)

OFFICIAL

Incident: Other relevant information (pollution incidents only)			
Pollutant			
Quantity or volume		Concentration	
Location of pollution (If different from the exact location of the event, also describing the extent of the pollution)			
Incident: Notification to relevant authorities (notifiable incidents only)			
Relevant Authorities to be notified (relevant information to be given in this notification is contained within this form)	Incident Observer immediate verbal notification made to: <input type="checkbox"/> Sydney Metro Nominated Environmental Representative <input type="checkbox"/> Principal Contractor's Environment Manager Sydney Metro Nominated Environmental Representative immediately notified: <input type="checkbox"/> Local Authority (Council) <input type="checkbox"/> EPA (through the Pollution Hotline on 131 555) <input type="checkbox"/> Ministry of Health <input type="checkbox"/> WorkCover Authority As soon as possible following immediate notification requirements: <input type="checkbox"/> Department of Planning, Housing and Infrastructure <input type="checkbox"/> Independent Environmental Representative		
Relevant Authority Notification made by (Name)			
Relevant Authority Notification made by (Position)			
Date of notification		Time of notification	
Incident: Investigation details			
Investigation details (Actions taken immediately to prevent or minimise environmental harm)			

Report due date		Allocated to	
Comments			
Relevant approval(s)		Relevant condition(s)	
Action(s) required for closure (Where an individual is assigned an action to close they must notify the Nominated Environmental Representative once this is achieved)			
Assigned to		Status	<input type="checkbox"/> Open <input type="checkbox"/> Close immediately
Due date			

Section 5: Non-compliance			
Relevant approval(s)		Relevant condition(s)	
Description of non-compliance			

Description of the impact of the non-compliance (i.e. what was the impact of the non compliance? was it administrative only? was it a one off event or ongoing over a period of time? etc.)			
Corrective and preventative action(s) required for closure (Where an individual is assigned an action to close they must notify the nominated Environmental Representative once this is achieved)			
Assigned to		Status	<input type="checkbox"/> Open <input type="checkbox"/> Close immediately
Due date			

Section 7: Signoff	
Signature	
Name	
Position	
Mobile	
Email	

Environmental Policy

Syscon is in the business of construction and maintenance of overhead and underground electrical infrastructure.

At all levels of our operation, Syscon plan and conduct their activities with a view to protecting and conserving the natural environment and employee health. We do this by complying with the Environmental Management System and meeting community expectations.

Syscon is committed to providing for its employees and the wider community, a level of environmental awareness, management and control that is in line with the community expectations and standards.

Syscon commits to establishing and reviewing measurable objectives and targets at relevant functions and levels on a quarterly basis in accordance with the annual Environmental Management Plan and the requirements of ISO 14001:2015 Environmental Management Systems.

Syscon commits to continual improvement and the prevention of pollution and to comply with applicable legal requirements and all other relevant requirements.

The document will be maintained and regularly reviewed to ensure that it remains relevant to Syscon's organisational processes.

This policy is made available to all persons working for or on behalf of Syscon and to the public via the company website and on Syscon common area notice boards.

Regards,



Peter Hocking
Managing Director



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