E.4 Preliminary Construction Environmental Management Plan

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Kalfresh SRAIP

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Document status

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0	Construction Environmental Management Plan	M. Palmer	M. Davis	M. Davis	6 Feb 2023

Approval for issue

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1 INTRODUCTION

1.1 Overview

RPS AAP Consulting Pty Ltd have been engaged to prepare a Construction Environmental Management Plan (CEMP) for the Scenic Rim Agricultural Industrial Precinct (SRAIP) project located at 6200 – 6206 Cunningham Highway, Kalbar Queensland, which will undertake Environmentally Relevant Activity (ERA) 53(a) Composting and 53(b) organic material processing by anerobic digestion for properly described as Lot 3 and Lot 4 on SP192221, refer to **Appendix A.** This CEMP will ensure compliance with all relevant approval, permits and legislative obligations.

1.2 Purpose of the Construction Environmental Management Plan

The purpose of this Construction Environmental Management Plan (CEMP) is to document the potential impacts from the works and detail specific environmental management strategies to be employed during the repair works so as to ensure compliance with the following approvals:

This CEMP is has been drafted to ensure compliance with the existing Site Based Management Plan and is primarily a tool for the Site Supervisor engaged to undertake the construction works for the SRAIP project to demonstrate adequate environmental management during the project.

The CEMP includes objectives, targets, monitoring procedures, auditing, training, and reporting requirements and clearly specified areas of responsibility related to the undertaking of the project guided by the various overarching environmental management procedures, plans and permit conditions.

1.3 Project Background and Location

The SRAIP facility it located in Kalbar within Lot 3 on SP192221 which is surrounding Kalfresh's land surrounding its current vegetable processing facility refer to Figure 1 below. The SRAIP will create a place where primary rural activities and secondary rural industry activities are located within proximity to each other and transport links to form a hub for the local food production industry. The current concept plan for the precinct is provided in **Appendix A.** This includes the location of the proposed composting and anaerobic digestion activities within Lot 3.

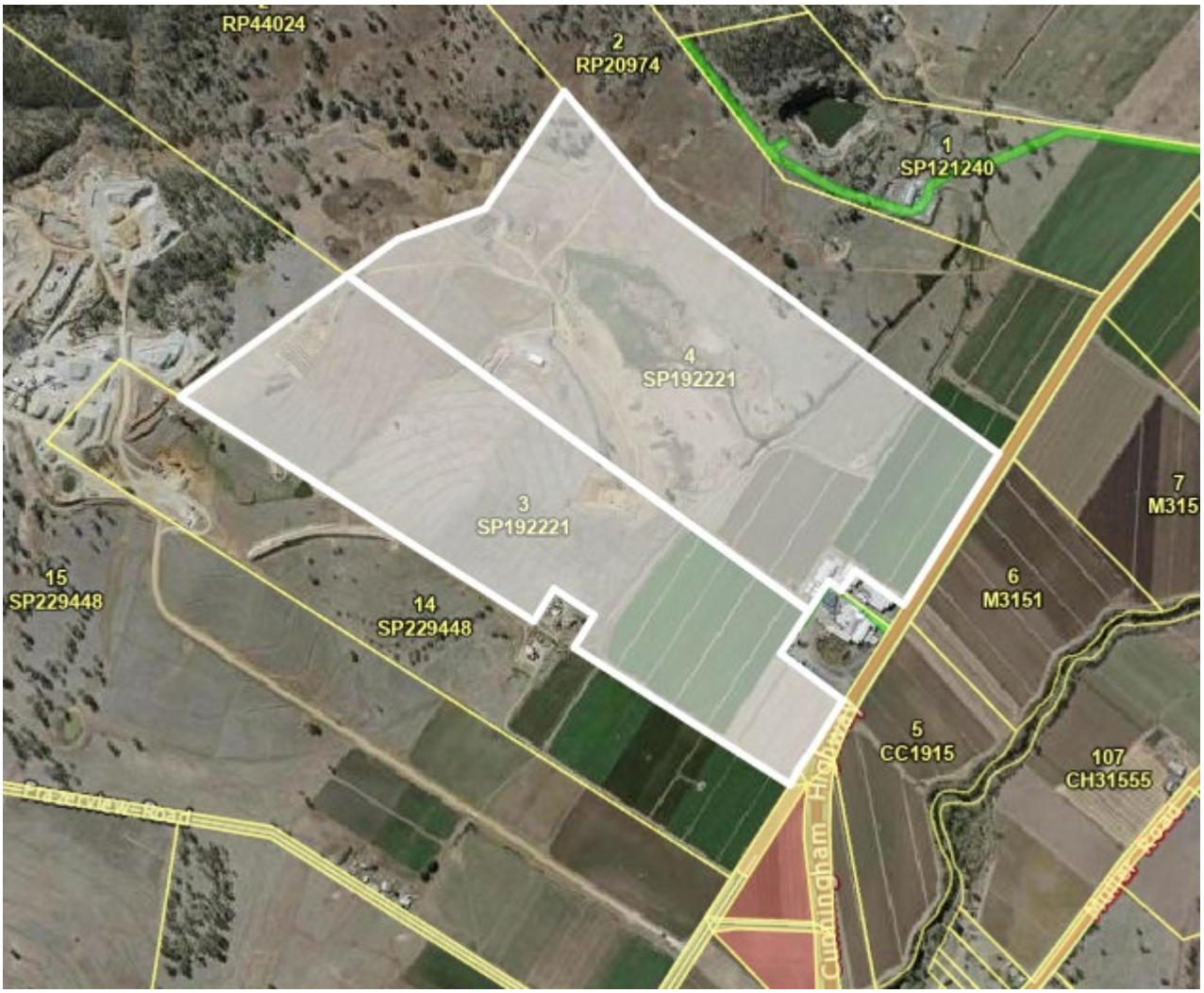

Figure 1 Site Location (Lot 3 and Lot 4 on SP192221)

1.4 Environmental Commitments

Kalfresh is a business that has good farming techniques at its core and is a business run by farmers, with a constant focus on the needs of our customers. The owners control all decisions, from seed selection, through to harvest, packing and distribution.

We're passionate about creating the freshest, tastiest, nutrient-rich produce possible. Our farming philosophy is driven by the belief that a happy plant is a healthy plant.

Over the years we've honed our farming system to ensure it is environmentally sustainable and that our soil health is excellent.

Our sustainable farming system ensures the health and viability of our soil and of our crops. Kalfresh commit to comply with the relevant environmental legislation and EA conditions.

1.5 Relevant Environmental Legislation

Key legislation relevant to the activity is detailed below:

- *Biosecurity Act 2015*
- *Environmental Protection Act 1994*

- *Environmental Protection Regulation 2019*
- *Environmental Protection (Water and Wetland Biodiversity) Policy 2019*
- *Bremer River environmental values and water quality objectives Basin No 143 (part) including all tributaries of the Bremer River 2010*
- *Environmental Protection (Air) Policy 2019*
- *Environmental Protection (Noise) Policy 2019*
- *Environmental Protection (Regulated Waste) Amendment Regulation 2018*
- *Land Protection (Pest and Stock Route Management) Act 2002*
- *Nature Conservation Act 1992*
- *Vegetation Management Act 1999*
- *Water Act 2000*
- *Waste Reduction and Recycling Act 2011.*

1.5.1 Relevant Standards and Guidelines

The following documents describe standard and guidelines applicable to the activity:

Erosion & Sediment Control

- Best Practice Erosion and Sediment Control (IECA 2008)
- Environmental Management Systems
- AS ISO 14001: 2016 – Environmental Management Systems
- AS/NZS ISO 31000:2009 Risk Management – Principles and Guidelines

Feedstock and end-product quality

- AS 4454-2012: Composts, soil conditioners and mulches
- Determination of Acceptable Levels of Preservative Treated Timber in Timber Reuse Applications (J. Hann et.al. 2010)

Hazardous materials

- AS 1940: 2004 – The storage and handling of flammable and combustible liquids
- Managing risks of hazardous chemicals in the workplace – Code of Practice (SWA 2018)

Noise

- Noise Measurement Manual (ESR/2016/2195, DEHP 2013a)

Water quality

- *Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZG 2018)*
- *AS/NZS 5667-1998: Water quality – Sampling*

- *Monitoring and Sampling Manual (DES 2018a)*
- *Queensland Water Quality Guidelines (DEHP 2013b)*
- *Guideline: Environmental Protection (Water) Policy 2009 - Deciding aquatic ecosystem indicators and local water quality guidelines (DES 2018b)*

2 ENVIRONMENTAL ROLES AND RESPONSIBILITIES

Kalfresh have engaged a suitably qualified contractor to undertake the SRAIP Project construction works who will have a dedicated Environmental Site Representative on site during works. RPS have developed this site-specific CEMP to meet the requirements of the DA and Environmental Authority.

Specifically, all project employees and subcontractors will be required to:

- Undertake all activities in accordance with the agreed plans of management, procedures and work statements;
- Report any activity that has resulted in, or has the potential to result in an environmental incident; and
- Ensure that they attend the environmental inductions provided.

2.1 Site Manager

The Site Manager is responsible for promoting and maintaining good environmental management and ensures that this CEMP is effectively implemented. The Site Manager is required to support the Site Manager and hold them accountable for their specific responsibilities. The Site Manager is responsible for taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions. The Site Manager must investigate and address complaints and incidents. The Site Manager is responsible for inducting all workers and subcontractors and directing site activities in accordance with this CEMP.

The Site Manager is responsible for taking all practical measures to ensure the site is operating according to this CEMP, and without risks to the environment. The Site Manager is responsible for detecting any non-compliance or environmentally risky conditions by undertaking regular inspections. If the Site Manager does not have the necessary authority to fix a problem, they are responsible for reporting the matter promptly and recommending remedial action to the Operations Manage.

2.2 All Workers

All workers are required to attend site inductions and follow this CEMP. All workers must undertake site works and comply with the general environmental duty as outlined within Section 319 of the Environmental Protection Act 1994 and a duty to notify of environmental harm as outlined within Section 320 of the Environmental Protection Act 1994. Workers must undertake activities in accordance with this CEMP and report all incidents, spills or non-conformances.

2.3 Subcontractors

All subcontractors engaged to perform work for Kalfresh are required, as part of their contract, to comply with this CEMP and to comply with directions from the company's designated officers. Failure to comply will be considered a breach of the contract and sufficient grounds for termination of the contract.

2.4 Environmental Reporting Structure

The responsibilities and reporting structure for key environmental management roles at the site have been broadly described in **Table 1** below.

Table 1 Site Reporting Structure

Position	Responsibilities and authorities
Chief Executive Officer (CEO)	Primary person responsible for preparation and implementation of the SBMP. Compliance with environmental requirements of the operation, including all applicable legislation, and consent conditions.

	Development and maintenance of standard operating procedures (SOP) and environmental control procedures (ECP). Training, awareness and competency of activity personnel. Communicating and directing the above to operation staff including activity management, site workers, sub-contractors and suppliers as applicable. Allocation of resources. Corrective and preventative action including emergency preparedness and response. Reporting and investigating any environmental non-conformances, complaints, incidents/emergencies or breach of approval conditions to the appropriate authorities. Environmental record management and reporting. Monitoring and review of environmental performance, and improvement opportunities.
Digestate Supervisor (DS)	On-the-ground implementation of the SBMP. Assisting the CEO and HR Manager in training, awareness and competency of operation personnel. Assisting the CEO in monitoring and review of environmental performance, and improvement opportunities. Supervision of feedstock acceptance – criteria and management. Waste and resource recovery management. Servicing and maintenance of plant and equipment. Inspection and monitoring. Site maintenance.
Human Resources (HR) Manager	Assisting the CEO and DS in training, awareness and competency of operation personnel.
Purchasing Manager	Communication and implementation of feedstock acceptance criteria for imported material.

3 ENVIRONMENTAL MANGEMENT MEASURES

3.1 Environmental Impact Assessment

RPS previously completed an Environmental Impacts on Environmental Values for the scope of works which is summarised below in **Table 3** below. Mitigation measures to measure the potential impacts identified are included for each aspect.

Table 2 Identification of Potential Impacts on Environmental Values

Element	PCCoC	Potential exposure pathways	PSR potentially exposed to adverse impacts	Risk ratings	
				Unmitigated	Mitigated
Construction	Air emissions (particulates / dust)	Airborne release	Sensitive receptors	Medium	Low
	Fire (spontaneous combustion)	Spreading	Neighbouring properties	High	Low
			Surrounding ecological EVs (MSES essential habitat)	High	Low
			Surrounding ecological EVs (MSES essential habitat)	High	Low
	Foreign matter (e.g. metal, plastics)	Compost use	Land / crop (value / viability)	Medium	Low
			Food consumer (health)	Low	Low
Stormwater	Suspended sediment, sheens / films, litter	Runoff	Downstream ecological surface water EVs	High	Low
Plant & Equipment	Air emissions (particulates / dust)	Airborne release	Sensitive receptors	Low	Low
	Offensive noise emissions	Airborne release	Sensitive receptors	Low	Low
	Nuisance noise	Air vibration	Sensitive receptors	Low	Low
	Leaks and spills (fuels and oils)	Releases to land / waters	Adjacent land and downstream waters	Medium	Low

Water Quality Management Plan

Objectives: Prevent or minimise the release of prescribed contaminants from the project site to waters

Project Specific Actions	Mitigation measures
Heavy rainfall or flooding during construction	• Relocate any mobile plant or equipment to higher parts of the site; • Removing potential contaminants from site ensuring that potential contaminants are protected from rainfall or stormwater flows; and • Ensuring all erosion and sediment control measures have been maintained and are in place.
Equipment maintenance	• Complete urgent & minor repairs using temporary bunding as required to prevent potential stormwater contamination.
Internal roads	• Minimise vehicle activity through stormwaters.
Fuel storage	• Install and maintain bunded storage area to AS1940 above flood levels.
Temporary offices/minor services	• Locate above flood levels.

3.1.1 Chemical and Fuel Management Plan

Chemical and Fuel Management Plan	
Objectives: Prevent or minimise the release of chemicals and fuels from the project site to the environment **Performance Criteria: No contamination of land or water from project activities**	
Project Specific Actions	**Mitigation Measures**
Storage of Fuels and Chemicals	Hazardous goods (liquid and solid) will be stored in a bunded area, in a drip tray, or on a large sealed surface and covered to keep rain out if possible. MSDSs are held on site for all hazardous materials. Spills will be contained, cleaned up with a spill kit as appropriate, and then removed.
Refuelling Procedure	Fuel will be obtained from a tank stored at the site office / storage compound. A spill kit must be immediately available when refuelling.
Plant Servicing	Plant servicing (if necessary) will be conducted at designated locations. Spill trays and spill kits will be kept on hand. All plant and equipment shall be maintained to minimize the leakage of oil, fuel and hydraulic and other fluids. During servicing on site (if performed), measures to capture and contain leakage shall be implemented so as to minimize contamination of the servicing area. These areas shall be remediated to the satisfaction of the Ports North at the completion of works.
Spill Kits	Supply and maintain a spill control kit containing at a minimum –Spill kits will be checked weekly by the Contractor's environmental representative and replenished by the person using the material after each use.
Emergency Response	In the case of spills the Site Supervisor will notify

3.1.2 Noise & Vibration Management Plan

Noise Management Plan

Performance Criteria: Nil complaints received regarding noise from the project.

Objective: Manage noise to minimise environmental harm or community nuisance.

Project Specific Actions			
Noise generating activities	Various activities on this project will generate noise.		
	Noise Generating Activity	**Location**	**Frequency**
	Construction plant and equipment	TBC	TBC
Noise Mitigation measures	• No unnecessary use of horns or other audible signals on mobile plant or equipment. Use of directional low frequency reversing beepers.		
	• Plant and equipment will be maintained in good working order and maintained as required. Where required, noise suppressors will be installed.		
	• Operators to report faulty equipment.		

3.1.3 Waste Management Plan

Waste Management Plan	
Performance Criteria: Maximise recycling and reuse opportunities and adequate management of wastes on site to reduce waste going to landfill.	
Project Specific Actions	**Mitigation Measures**
Waste disposal process	Before disposal of materials as waste, the Contractor will seek to avoid generation of waste by reuse of materials wherever possible. Where avoidance and reuse is not possible, then the material will be considered as a resource for recycling. If the material is unable to be recycled then it will be disposed of to landfill.
	Burning and burying waste is not permitted on the site. Waste will be contained in appropriate receptacles (skips, bins etc.) and be located in the site compound.
	All waste storage containers will be: • secured to prevent access by vermin and native fauna. • covered to prevent leaching from incident rainfall, unless appropriately contained and managed on site. •
	The site will remain free of litter and all waste will be disposed or removed from site prior to completion of works.
Waste Reporting	

3.1.4 Air Quality Management Plan

Air Quality Management Plan	
Performance Criteria: Prevent impacts to air quality including environmental nuisance.	
Project Specific Actions	**Mitigation Measures**
Dust from construction activities	Minimise vehicle activity during dry and dusty conditions. Stabilise internal roads if required.
Vapour/odour from chemical sealants, paints, glues/mastics.	Ensure MSDS for all chemical is available. Store chemicals within bunded containers in accordance with AS1940.

4 ENVIRONMENTAL INSPECTIONS AND REPORTING

4.1 Reporting environmental incidents and non-conformances

All staff and sub-contractors are responsible for immediately notifying their direct supervisor of an environmental incident, who will in turn notify the CEO.

Records of incidents and complaints (i.e. other than trivial matters) shall be detailed in a Corrective Action Report form and logged in the CAR Register. The CAR will include, as a minimum:

- date and time of incident / non-compliance / complaint
- contact details of the person(s) who detected or notified the matter
- nature of the matter and potential impacts
- outcomes of any investigation of the matter
- details of the corrective actions undertaken.

4.2 Records and registers

Records must be stored in a safe and secure manner which limits the potential for deterioration, damage or loss for a minimum of 5 years. Records to be maintained shall include:

- induction register including persons trained, date of training, trainer and summary of training delivered
- daily / weekly inspection reports, checklists, diary entries
- material origin, inspection and testing records demonstrating conformance with feedstock acceptance criteria, and compost quality objectives
- leachate and water quality monitoring results
- correspondence relating to environmental management matters
- incident and corrective action register
- non-conformance reports and / or correspondence regarding environmental incidents
- results, analysis and corrective actions
- waste tracking records
- records of compliance with relevant approvals
- other records identified in the environmental sub-plans and control procedures.

The above project records shall be made available to relevant authorities on request.

Appendix A Site Layout Plan

0 10 20 40 60 80 1 : 2,500 @ A1

KALFRESH
SCENIC RIM AGRICULTURAL INDUSTRIAL PRECINCT
6200 CUNNINGHAM HWY, KALBAR 4309 QLD

MANAGEMENT SUBDIVISION PLAN - PHASE 2 (STAGES 1-4)

PLAN REF:	**142489 – 11**
Rev No:	**P**
DATE:	23 FEBRUARY 2023
CLIENT:	KALFRESH
DRAWN BY:	NV
CHECKED BY:	JC / PHE

Legend

- Site Boundary
- Stage Boundary
- Proposed Flow Path Q100
- Proposed Future Compost Lot
- Proposed access easement servicing Lot 3 and Lot 5
- Land subject to approved boundary realignment and access easement in conjunction with approved Quarry on Lot 9 on SP209733 (Lot 6)
- Proposed Access Easement - Composter Lot Access
- Proposed Stormwater Infrastructure (Common Property)
- Proposed Overland Flow (Easements, Part of Lot 18 and Lot 20)
- Proposed Cunningham Highway Frontage Common Property (3 metres wide)
- Proposed Utilities Common Property (4 metres wide)
- Volumetric Lot - Lot 80 (1 metre below ground surface)

Total No. of Allotments	17
Industry Allotments 6000m² – 1.00 ha	3
Industry Allotments 1.00 ha – 2.99 ha	10
Industry Allotments 3.000 ha +	2
Digester & Energy Site	1
Infrastructure Lot	1

DRAFT
For Discussion Only

Note:
All Lot Numbers, Dimensions and Areas are approximate only, and are subject to survey and Council approval.

Dimensions have been rounded to the nearest 0.1 metres.

Areas have been rounded down to the nearest 5m².

The boundaries shown on this plan should not be used for final detailed engineers design.

Source Information:
Site boundaries: DCDB
Adjoining information: DCDB.
Contours: RPS Survey
Overland Flow Path: Aurecon

URBAN DESIGN
Level 4 HQ South
520 Wickham Street
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Fortitude Valley QLD 4006
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W rpsgroup.com

Precinct Map
Scale: 1 : 10,000

Appendix B Development Permit

TO BE ADDED WHEN AVAILABLE

Appendix C Environmental Authority

TO BE ADDED WHEN AVAILABLE

Appendix D Daily Environmental Checklist

TO BE ADDED WHEN AVAILABLE

Appendix E Environmental Monthly Report

Kalfresh - Scenic Rim Agricultural Industrial Precinct (SRAIP)	**Contract No:**
Environmental Monthly Report	**Revised:**

Month of Report			
Contractor		**Date**	

1. ENVIRONMENT & HERITAGE INCIDENTS

Incident Level*	Description of Incident	Corrective Actions Undertaken	Incident was reported to Administrator within 24hrs	Has this incident occurred previously?
			Y / N	Y / N
			Y / N	Y / N
			Y / N	Y / N

*Incident levels are to be classified according to the Environmental Incident Management Framework published in the PN Environmental Management System.

2. CEMP IMPLEMENTATION AUDIT

Has an CEMP Implementation Audit been conducted on the project? ☐ Yes ☐ No

If yes, are all corrective actions closed out? ☐ Yes ☐ No – Is further contractual action required?

3. ENVIRONMENTAL INSPECTIONS

Number of Environmental Inspections completed this month by Contractor: *[No. of environmental inspections]*

Have non-conformances raised through Environmental Inspections been closed out: ☐ Yes ☐ No

If no, is a corrective action request required? *[provide decision and justification]*

4. CEMP AMENDMENTS

List amendments made to the CEMP this month. If appropriate, attach amended sections or drawings to the monthly report.

5. ACTIONS TO IMPROVE CONTRACTORS ENVIRONMENT & HERITAGE PERFORMANCE

List any specific actions that could be undertaken by either the contractor, superintendent or principal to improve environmental performance.

6. ENVIRONMENT OR HERITAGE LEARNINGS

Learnings regarding environment and heritage either due to constructability, scheduling, design etc.

Appendix F Environmental Incident Report Form

ENVIRONMENTAL INCIDENT REPORT FORM

This form is to be completed for any environmental accident or incident.

Please note: *this form is to be filled in after the event at the time of the incident please call either;*

- Port Supervisor
- Operations Office Cairns – (07) 40512558 or 0419 657 350
- Environment Manager – (07) 40523820 or 0439 723 008

Once completed, please forward to

Environment Manager, Ports North, PO Box 594, Cairns Q, 4870. Ph: 4052 3820, Fax: 4052 3853

Event Details

Please Circle

Incident (release or harm to environment occurred)		**Near Miss** (no release to environment or harm)		
When:		Date _ _ /_ _ / _ _	Time	am/pm
Reported BY:		Date _ _ /_ _ / _ _	Time	am/pm
Reported TO:		Date _ _ /_ _ / _ _	Time	am/pm
Location details:				

4.2.1.1 Description

Describe clearly the circumstances leading to the accident/incident, and the accident/incident itself. As far as possible verify the facts recorded, a dentify witnesses.	
Type	**If Spill – Approx. Quantity**
Cause/Circumstance *Drawing?*	
Name	**Position**
Organisation	**Telephone**
Signature	**Date**

Prevention: *To be completed by Manager/Supervisor*		
Method of Cleanup;		
Equipment Used		
Method and Location of Waste Disposal		
Existing Measures in Place to prevent or Minimise this type of event;		
Follow Up:		
Measures to be implemented to prevent this occurring again?		
Name		Signature
Position	Date	Organisation

Close Out: *To be completed by Environment section*
Recorded in Register?
Follow Up Letter Sent to Company
Feedback provided to Reporter?

Appendix G Environmental Incident and Near Miss Events – Response Actions and Reporting Matrix

Environmental Incident and Near Miss Events – Response Actions and Reporting Matrix

The purpose of this document is to outline the reporting requirements for actual and/or potential environmental incidents.

Category			Near Miss (nil discharge, potential to cause harm/release)			Incidents (release to environment, actual harm)		
			1 Serious	2 Material	3 Nuisance	1 Serious	2 Material	3 Nuisance
Triggers (starting at level three and working upward, identify which is the minimum criteria triggered) Refer to EINM Classification Framework Flowchart			• had event occurred it would have required >$50,000 to rectify, remediate or repair site following event • potential for significant and major release to the environment • could have resulted in residual, measurable contamination, probable ongoing harm, non trivial pollution event • possible negative impact on numerous and/or high conservation status flora or fauna • media interest and adverse publicity would have been highly likely had event occurred. • triggered statutory obligations to report to administering agencies e.g. EPA, GBRMPA.	• had the event occurred it would have required > $5000 to repair/prevent reoccurrence • potential negative impact on multiple flora or fauna with moderate conservation status, or single individual of a species with higher conservation status. • potential release of contaminants to the environment likely to cause some short term (days) residual effects.	• potential for < $5,000 to repair/prevent • potential for minor spill – no release. • 100% containment possible (in bund or interceptor, on apron, sealed surface etc.) potential to impacts on few and/or common flora or fauna	• requires an estimated >$50,000 to rectify, remediate or repair • >$10,000 required for unscheduled maintenance • <100% containment – spill not able to be recovered completely. • significant and major release to environment • residual, measurable contamination, possible ongoing harm, non trivial pollution event • negative impact on numerous and/or high conservation status flora or fauna • media interest and adverse publicity • in addition to one or more of the above factors there would be statutory obligations to report to administering agencies e.g.-EPA, GBRMPA	• > $5000 to repair/prevent reoccurrence • <100% containment, moderate release to environment • minor negative impact on multiple flora and fauna of moderate conservation status some residual, measurable contamination (days).	• < $5,000 to repair/prevent reoccurrence • minor spill/ release to the environment – unable to contain 100% of spill • impacts on few and/or common flora or fauna • no measurable residual impact
Notification Process			**Procedures and or Documents to be Completed**					
Internal	Action & Timeframe & Responsibility	Initial alert	Immediate – any staff involved inform Supervisor Ph or radio call to Operations Centre, Operations Officer. Call Env Mgr	Immediate – Inform Supervisor	Immediate - Inform co-workers	Immediate – any staff involved inform Supervisor Ph or radio call to Operations Centre, Operations Officer. Call Env Mgr	Immediate - Inform Supervisor	Immediate – Inform co-workers
		Post containment	<1hr - Inform Env Mgr or GM via ph call or briefing – then Inform GM <1hr	<1hr - Ph call to EM or GM	<3hrs - Inform supervisor	<1hr - Inform EM Advise EPA and or CCC etc.	<1hr - Ph call to EM or GM	<3hrs - Inform supervisor
		Post Clean Up	< 3hrs - GM to inform CEO with all details EM inform EPA or Council (written)	<3hrs - Inform GM	< 3days - Share Point Alert to GM	< 3hrs - GM to inform CEO with all details EM inform EPA or Council (written)	<3hrs - Inform GM EM may call EPA or Council	Share Point Alert to GM

		Initial alert	Immediate -Brief Ph or radio call to Ops Centre - supervisor	Immediate -Brief Ph or radio call to Ops Centre - supervisor	Immediate -Brief Ph or radio call to Ops Centre - supervisor	Immediate -Brief Ph or radio call to Ops Centre - supervisor	Immediate -Brief Ph or radio call to Ops Centre - supervisor	Immediate -Brief Ph or radio call to Ops Centre - supervisor
		Post Containment	Details provided to Env Mgr on site	Provide details to Port response staff	Staff complete Incident Report Form	Details provided to Env Mgr on site	Provide details to Port response staff	Staff complete Incident Report Form
		Post Clean Up	Company Mgr to advise Ops Centre, when response complete GM to inform CEO. Company to notify regulatory agency – MSQ, EPA, Council etc.	Detailed Report Form from Company to Ports North In writing to Ports North	Report form sent to GM or Env Mgr Incident Report Form details entered by Env Mgr to Share Point = Alert to GM	Company to advise Ops Centre when complete GM to inform CEO. Company to notify regulatory agency – MSQ, EPA, Council etc.	Detailed Report Form from Company to Ports North in writing to Ports North	Report form sent to GM or Env Mgr Incident Report Form details entered by PN Env Mgr to Share Point = Alert to GM
Investigation								
Immediate			Env Mgr and GM to follow SWP Incident Investigation – attend scene	GMgr to initiate completion of Investigation Report Env Mgr may attend scene	Env Mgr to ensure all details on Incident Report Form complete Ops staff attend scene	Env Mgr and Ops Mgr to follow SWP Incident Investigation – attend scene	Env Mgr to confirm details with responsible party by email / phone. EM may attend scene	Env Mgr to ensure all details on Incident Report Form complete Ops staff attend scene
Post Event Response			Letter to offender signed by GM requesting additional details and corrective actions GM to sign off on Investigation Report	Letter to offender by GM – requesting further info or noting event	Ph call or email to confirm details and raise concern about event by EM to offender	Letter to offender signed by GM requesting additional details and corrective actions GM to sign off on Investigation Report	Letter to offender by GM – requesting further info or noting event	Ph call or email to confirm details and raise concern about event by EM to offender
Reporting Process			****** All events are to be recorded on the **Incidents and Near Miss Register** – or via Company or PN Incident Report Form					*******
Internal	Document		Formal Near Miss Investigation Report	Ph call or email by Env Mgr to staff involved	SharePoint item added - in monthly report	Formal Incident Investigation Report	Ph call or email by Env Mgr to staff involved	SharePoint item added - details in monthly report
	Timeframe		Draft complete within 14 days	< 7 days	Monthly	Draft complete <14 days	< 7 Days	Monthly
	Responsibility	By	Finalised by EM, reviewed by GM and forward to	Finalised by EM, reviewed by GM and forward to	Env Mgr or staff	Finalised by EM, reviewed by GM and forward to	Finalised by EM, reviewed by GM and forward to	Env Mgr or staff
		To whom	CEO	GM	details in monthly performance report	CEO	GM	details in monthly performance report
	Document		Formal Letter – notifying PN actions, request details of corrective actions	Ph call or email by Env Mgr to company env staff involved	Ph call	Formal Letter - details of non-conformance and corrective actions.	Ph call or email by Env Mgr to company env staff involved	Ph call

Timeframe		<14 days of completion of report or to meet licence conditions	<7 days	<3 days	<14 days of completion of report or to meet licence conditions	<7 days	<3 days
Responsibility	By	drafted by Mgr and signed by GM,	Env Mgr or GM	Env Mgr	Formal letter to	Env Mgr or GM	Env Mgr
	To who	Sent to company , copy to administering agency, copy lodged on project or tenants central file	Responsible companies env or operations management	Staff involved	Sent to company , copy to administering agency, copy lodged on project or tenants central file	Responsible company Env or operations management	Staff involved