



Western Sydney Airport

**Site Environmental Management Framework
July 2022**



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Plan Authorisation

Position	Name	Signature	Date
Environment Manager	L Laughton		

Terms and Definitions

Item	Definition
ABC	Airport Building Controller
ABC Regulations	<i>Airports (Building Control) Regulations 1996</i> (Cth)
ACP	Airside Civil and Pavements
AEO	Airport Environment Officer (person appointed under the AEPR 2.01)
AEPR	<i>Airports (Environment Protection) Regulations 1997</i> (Cth)
AHD	Australian Height Datum
Airport	Western Sydney International (Nancy-Bird Walton) Airport (WSI). NB: The Airport is referred to in the Airports Act as Sydney West Airport and is also commonly known as Western Sydney Airport
Airport Lease	A lease for the Airport granted under section 13 of the Airports Act
Airport Plan	Means the Airport Plan for the Airport Site as determined by the Infrastructure Minister under section 96B of the Airports Act. The latest Airport Plan was determined in September 2021 and authorises Rail Development on the Airport Site.
Airport Site	The site for Sydney West Airport as defined by the Airports Act
Airports Act (or 'the Act')	<i>Airports Act 1996</i> (Cth)
ALC	Airport Lessee Company (the Company granted a lease over the Airport Site)
Ancillary Development	An 'ancillary development' as set out in section 96L of the Airports Act
Approved Plan	A Plan approved in accordance with the Airport Plan Conditions of Approval
Approver	For Condition 30 of the Airport Plan (Biodiversity Offset Delivery Plan) and any matter relating to the Biodiversity Offset Delivery Plan – the Environment Minister or an SES employee in the Environment Department For other matters – the Infrastructure Minister or an SES employee in the Infrastructure Department
Apron	The part of an airport used for: <ul style="list-style-type: none"> a. the purposes of enabling passengers to embark/disembark an aircraft; b. loading cargo onto, or unloading cargo from, aircraft; and/or c. refuelling, parking or carrying out maintenance on aircraft
ARFFS	Aviation Rescue and Firefighting Service
AS/NZS	Australian Standard / New Zealand Standard
Associated Site	An 'associated site for Sydney West Airport' as set out in section 96L of the Airports Act
ATC	Air Traffic Control
ATCT	Air Traffic Control Tower
BEC	Bulk Earthworks Contract
Bulk Earthworks	The large-scale earthworks required to flatten the Stage 1 Airport Development Area in preparation for further construction works as described in section 6 of the Construction Plan
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i> (Cth)
CEMF	Contractor Environmental Management Framework

Item	Definition
CEMP	Construction Environmental Management Plan (required under Section 3.11.2 of the Airport Plan)
CIP	Cumulative Impacts Plan
CIZ	Construction Impact Zone. The part or parts of the Airport Site or an Associated Site on which Main Construction Works are planned to occur, as detailed in the Construction Plan
Condition	A condition set out in Part 3 of the Airport Plan in accordance with section 96C of the Airports Act
Construction Period	The period from the date of commencement of Main Construction Works in any part of the Airport Site until the date of commencement of Airport Operations
CSEP	Community and Stakeholder Engagement Plan (required under Condition 15 in Section 3.11.2 of the Airport Plan)
CSR	Combined Services Route
D&C	Design and Construct
DAWE	Department of Agriculture, Water and the Environment (Cth)
DFSI	Department of Finance, Services and Innovation (Cth)
DIPNR	NSW Department of Infrastructure, Planning and Natural Resources (now DPIE)
DITRDC	Department of Infrastructure, Transport Regional Development and Communications (Infrastructure Department) (Cth)
DPC	NSW Department of Premier and Cabinet
DPE	NSW Department of Planning and Environment (formerly DPIE)
DPI	Department of Primary Industries (including Agriculture NSW, Fisheries NSW and NSW Office of Water) (now DPIE)
DPIE	NSW Department of Planning, Industry and Environment (now DPE)
ECM	Environmental Control Map
Ecologically Sustainable Development	Using, conserving and enhancing the community's resources so that the ecological processes on which life depends are maintained and the total quality of life now and in the future, can be increased (Council of Australian Governments, 1992)
ECZ	Environmental Conservation Zone
EES	The Environment, Energy and Science (EES) group within the NSW DPE, formerly known as Office of Environment and Heritage
EEW	Early Earthworks
EIS	Environmental Impact Statement prepared for WSI under the EPBC Act
EMS	Environmental Management System
Environment Minister	The Minister responsible for the EPBC Act
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
EPA	NSW Environment Protection Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
ESA	Environmentally Sensitive Area
ESCP	Erosion and Sediment Control Plan
ETC	Enterprise Technology Contract
EWMS	Environmental Work Method Statement
FASL	Final Airport Site Layout

Item	Definition
GSE	Ground Support Equipment
Ha	Hectares
Infrastructure Department	The Department responsible for administering the Airports Act, currently the Australian Government Department of Infrastructure, Transport Regional Development and Communications (DITRDC)
Infrastructure Minister	The Minister responsible for the Airports Act from time to time
ISO 14001	AS/NZS ISO 14001:2016 Environmental Management Systems
Km	Kilometres
LCB	Landside Civil and Buildings
LDP	Land Disturbance Permit
LEP	Local Environmental Plan
M12 on Airport Works	The physical works and infrastructure, including temporary works and infrastructure which the M12 Authority, its contractors and nominees plan, investigate, design, construct, install, commission, test, accept, complete, maintain, operate or repair within the Airport Site
Main Construction Works (MWC)	Substantial physical works on a particular part of the Airport Site (including large scale vegetation clearance, bulk earthworks and the carrying out of other physical works, and the erection of buildings and structures) described in Part 3 of the Airport Plan, other than TransGrid Relocation Works or Preparatory Activities
MI	Material Importation
MTIP	Major Transport and Infrastructure Projects (Cth) - a Division of DITRDC
Non-conformance	Failure to conform to the requirements of the Airport Plan including Approved Plans
POEO Act	<i>Protection of the Environment Operations Act 1997</i> (NSW)
Preparatory Activities	<ul style="list-style-type: none"> a. day to day site and property management activities; b. site investigations, surveys (including dilapidation surveys), monitoring, and related works (e.g. geotechnical or other investigative drilling, excavation, or salvage); c. 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); d. enabling preparatory activities such as: <ul style="list-style-type: none"> i. demolition or relocation of existing structures (including buildings, services, utilities and roads); ii. the disinterment of human remains located in grave sites identified in the European and other heritage technical report in volume 4 of the EIS; and iii. application of environmental impact mitigation measures; and e. any other activities which an Approver determines are Preparatory Activities for this definition
RAP	Remediation Action Plan
SEMF	Site Environmental Management Framework (Construction Plan, Appendix 2)
SEPP	State Environmental Planning Policy
SES	Senior Executive Service
SES Officer	An SES employee under the <i>Public Service Act 1999</i> (Cth)
Stage 1 Airport Development	The Airport development described in Part 3 of the Airport Plan
Sustainability Plan	Plan required by Condition 29, Section 3.11.5 of the Airport Plan

Item	Definition
Sydney West Airport	The Airport. NB: this is the name used in the Act. The Airport is known as Western Sydney International (Nancy-Bird Walton) Airport, or, more commonly, Western Sydney International
TfNSW	Transport for New South Wales
the Project	Western Sydney Airport – Stage 1 Airport Development
TSS	Terminal and Specialty Services
WSA	WSA Co Limited (ACN 618 989 272), the entity responsible for constructing and operating the Airport in accordance with the Airport Plan. For the purposes of the Airports Act, WSA is the “Airport Lessee Company” for WSI.
WSI	Western Sydney International (Nancy Bird Walton) Airport. The Airport. NB: Under the Airports Act, the Airport is referred to as Sydney West Airport

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1 Introduction

1.1 Background

In April 2014 the Australian Government announced that the Commonwealth-owned land at Badgerys Creek will be the site for a second Sydney Airport. The Badgerys Creek airport site was selected following extensive studies completed over a number of decades.

In December 2016, the Minister for Urban Infrastructure determined the Airport Plan which sets the environmental and planning authorisation for the development of Stage 1 of the Western Sydney International (Nancy-Bird Walton) Airport. In May 2017, the Government announced that it would establish WSA Co Limited, to develop and operate the Airport. In September 2021, the Airport Plan was updated to authorise a rail development (the Sydney Metro – Western Sydney Airport project) on the Airport Site. WSA is responsible for constructing and operating the Airport in accordance with the Airport Plan.

The Environmental Impact Statement (EIS) prepared in accordance with the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) and the *Airports Act 1996* (the Airports Act) considered potential impacts during construction activities for the site and operation of the Stage 1 Airport Development.

This Site Environmental Management Framework (SEMF) is Appendix 2 of the Construction Plan. The Construction Plan has been prepared to meet the requirements of Condition 1 of the Airport Plan for the Stage 1 Airport Development (September 2021). The SEMF has been prepared as WSA's overarching environmental management document to support the implementation of nine Construction Environmental Management Plans (CEMPs) and other Approved Plans. The objective of the Stage 1 Airport Development is to improve access to aviation services and resolve the long-term aviation capacity constraints in the Sydney basin.

1.1.1 The Need for an Airport

The 2012 Joint Study on aviation capacity in the Sydney region identified growing airport capacity constraints in the Sydney basin and found that Sydney (Kingsford Smith) Airport (Sydney Airport) will be unable to meet the increasing demand in the Sydney basin.

Over the next 20 years, it is estimated that demand for passenger aviation services in Sydney will more than double, from 40 to 87 million passengers per annum, and double again by 2060. Sydney (Kingsford Smith) Airport will not be able to meet this demand alone. Any shortfall in airport capacity could have a significant adverse impact on economic growth, productivity and employment in both New South Wales and Australia.

Whilst a number of strategic options have been assessed, detailed studies over a number of decades have consistently found that the most effective way to address increased aviation demand, while mitigating environmental and social impacts, is to develop a new airport in Badgerys Creek.

1.1.2 WSA Delivery of the Western Sydney International Airport

WSA is responsible for constructing and operating the Airport in accordance with the Airport Plan. This section sets out WSA's approach to constructing Western Sydney International (Nancy Bird Walton) Airport (**WSI**) and ensuring that operational readiness is achieved by 2026.

1.1.3 Objectives of the Western Sydney International Airport

The development of WSI will bring a range of benefits to Western Sydney and the Australian economy. WSA's objectives for the WSI are (**WSA Objectives**) to:

- **improve access to aviation services in Western Sydney:** by providing a broad range of passenger and air freight services;

- **resolve the long-term aviation capacity issue in the Sydney basin:** by maximising the aviation capacity of the site, noting the constraints at Sydney (Kingsford Smith) Airport;
- **maximise the value of a Western Sydney International as a national asset:** including consideration of benefits the Airport will bring within and around Western Sydney, NSW and Australia and enhancing Australia's international competitiveness for air travel;
- **optimise the benefit of Western Sydney International on employment and investment in Western Sydney:** by recognising that the Airport will be a major catalyst for growth and development in Western Sydney;
- **effectively integrate with new and existing initiatives in the Western Sydney area:** by ensuring long-term planning considers the Airport's economic, social and environmental impact in Western Sydney; and
- **operate on commercially sound principles, having regard to the Australian Government's intention to preserve its options with respect to ownership and governance arrangements:** by applying private sector discipline in the management of WSA.

1.1.4 Western Sydney International Airport

WSI is being developed on around 1,800 hectares of Commonwealth-owned land at Badgerys Creek in Western Sydney (**Airport Site**). The Airport Site is located approximately 50 kilometres from Sydney's central business district.

The Airport Site is bound by Elizabeth Drive to the north, Willowdene Avenue and The Northern Road to the south, Luddenham and Adams Road to the west, and Badgerys Creek to the east. The existing terrain was made up of undulating topography, and substantial earthworks have been undertaken to date to create a level surface to allow construction of the runway, taxiways, terminal and support services.

1.1.5 Western Sydney International Scope of Works

The Project (Stage 1 Airport Development) scope of works is defined in the EIS (Section 1.3) and the Airport Plan and at a high level includes the investigation, design, construction and commissioning of:

- Early earthworks;
- Experience Centre and Site Office;
- Bulk earthworks to move and redistribute approximately 26 million cubic metres of material on the Airport Site;
- A single 3.7-kilometre runway;
- Aprons, taxiways and other airside pavements;
- A multi-user terminal;
- Appropriate airport and aviation support facilities;
- Drainage and utilities infrastructure;
- Car parking, on-site roads and other appropriate landside facilities.

Further Project details including construction activities , programming and methodologies are included in the WSA Construction Plan (WSA00-WSA-00000-CN-PLN-000001).

The Construction Plan requires approval by an Approver to satisfy Airport Plan Condition 1. Necessary plan variations will be submitted to the Infrastructure Department for Approval in accordance with Airport Plan Condition 49.

The Airport will initially deliver capacity for 10 million annual passengers and is planned to be capable of handling both domestic and international services. It will also be designed to accommodate future staged developments on the Airport Site which will include a second parallel runway, additional infrastructure and additional terminal capacity.

1.2 Purpose of this Document

This SEMF has been prepared as a component of the Construction Plan to provide WSA with an overarching environmental management document to support the implementation of the CEMPs and other approved plans during the development of the Airport Site. The SEMF provides the overarching environmental management framework for the construction phase of the Stage 1 Airport Development, detailing WSA's requirements, mitigation measures and controls to be satisfied and achieved for each element of the construction works.

This SEMF is consistent with the Construction Environmental Management Framework described in Chapter 28 of the EIS which was prepared to inform the Airport Plan. The SEMF has been prepared in accordance with the Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004) and is consistent with AS/NZS ISO 14001:2016 Environmental Management Systems.

Implementing this SEMF and the Airport Plan approved plans effectively will ensure that WSA and any contractors and or suppliers to the project meet regulatory and policy requirements in a structured and systematic manner whilst demonstrating continual improvement with regards to environmental performance.

In summary, this SEMF has been developed to:

- Outline the strategy and approach to be applied to the project by WSA to ensure that contractors and suppliers comply with environmental obligations under their respective contracts;
- Ensure that the Conditions, as set out in the Airport Plan, are met and satisfied by both WSA and contractors;
- Meet the requirements of AS/NZS ISO 14001:2016 Environmental Management Systems, including the need for continual improvement; and
- Provide WSA personnel and contractors with systems, procedures and documentation necessary to complete the project in accordance with environmental requirements.

More specifically, this SEMF:

- Supports the Construction Plan which describes the project in detail including activities to be undertaken and relative timing;
- Provides planning tools (Environmental Work Method Statements (EWMS), Environmental Control Maps (ECMs), etc) to be applied in consideration of the nine CEMPs to avoid or minimise adverse environmental impacts;
- Provides details of applicable policies, approvals, licences, permits, consultation agreements and legislative requirements;
- Describes environmental management roles and responsibilities;
- Sets the Project's key environmental performance objectives and targets; and
- Describes how management and mitigation controls will be monitored to ensure they are being adequately implemented.

This SEMF as an appendix to the Construction Plan (WSA00-WSA-00000-CN-PLN-000001) will be made available to all employees and persons involved in construction of WSI, including relevant sub-contractors.

1.3 Consultation

Community and stakeholder consultation for the Project has been undertaken to inform the preparation of the EIS and development of the Airport Plan. Consultation has continued during the preparation of the CEMPs. A summary of the consultation is provided in the following sections.

1.3.1 Consultation Completed to Date

Community and stakeholder consultation for the project was delivered in three phases throughout the EIS process and development of the Airport Plan as follows:

- Phase 1: Preparation of the draft EIS and draft Airport Plan, from September 2014 to October 2015;
- Phase 2: Public exhibition of the draft EIS and draft Airport Plan, from 19 October 2015 to 18 December 2015; and
- Phase 3: Finalisation of the EIS and preparation of the revised draft Airport Plan, from 19 December 2015 to December 2016.

The primary objective of the EIS and Airport Plan communication and engagement activities were to:

- Proactively and regularly engage with stakeholders to ensure they were appropriately consulted throughout the EIS and approval process;
- Inform and advise the community, with a particular focus on the Western Sydney community, of the proposed development activity and the next steps in the process;
- Engage with the community to communicate the significant benefits of the proposed airport and address any points of concern;
- Encourage participation in the conversation and submission of comments through community consultation opportunities; and
- Provide accessible and reliable information about the Project.

Engagement with key stakeholders was a key component of communication and engagement activities during all three of the consultation phases listed above.

With regards to EIS consultation with Aboriginal groups, consultation was undertaken with reference to *Ask First, A Guide to Respecting Indigenous Heritage Places and Values* (Australian Heritage Commission 2002) and was guided by the requirements set out in the document *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (OEH 2010). This included the following stages:

- **Stage 1** - Notification of the project proposal and identification and registration of stakeholders;
- **Stage 2 and 3** - Presentation of information about the project and proposed cultural heritage assessment methodology and the gathering of information about cultural significance; and
- **Stage 4** - Review of Aboriginal cultural heritage assessment.

The EIS consultation and engagement ensured stakeholders were informed and were able to assist their broader communities in accessing information about the Project. Targeted stakeholders included numerous Commonwealth, State and Local government agencies and authorities in addition to selected corporate, commercial and utility organisations.

1.3.2 SEMF Consultation

Airport Plan Condition 35 outlines the consultation requirements during the preparation of the CEMPs and other Plans. Consultation was completed during the development of the SEMF (Revision 0) and subsequently during the review and update of Revision 1, 2 and 3 of this Plan. A summary of the stakeholder and government authority consultation completed and used to inform the review of Revision 1 and finalisation of Revision 4 is presented in Table 1.

Consultation will continue with agencies, councils and other relevant stakeholders throughout the project, including where there is a proposal for a plan variation and the submission of the variation to an Approver. The outcomes of consultation will be documented in subsequent variations of the relevant CEMPs. Consultation will be managed in accordance with the Community and Stakeholder Engagement Plan (CSEP).

Table 1: Consultation on CEMPs

CEMP	Requirement	EIS Reference	Agency consulted
Noise and Vibration CEMP	The Noise and Vibration CEMP will be prepared in consultation with the NSW Environment Protection Authority and NSW Health.	Table 28-2	<ul style="list-style-type: none"> • NSW Environment Protection Authority (EPA) • NSW Health.
Biodiversity CEMP	The Biodiversity CEMP will be prepared in consultation with the Department of Environment and Energy and the NSW Office of Environment and Heritage	Table 28-4	<ul style="list-style-type: none"> • Commonwealth Department of Environment and Energy (now Department of Agriculture, Water and the Environment (DAWE)) • NSW Office of Environment and Heritage (OEH) (now Department of Planning & Environment (DPE), Environment, Energy and Science (EES)) • NSW Rural Fire Service
Soil and Water CEMP	The Soil and Water CEMP will be prepared in consultation with the Department of Environment and Energy, NSW Office of Environment and Heritage, NSW Environment Protection Authority and relevant local councils	Table 28-6	<ul style="list-style-type: none"> • NSW EPA • NSW Office of Water (now DPE Water) • Penrith City Council • Liverpool City Council • Department of Environment and Energy (now DAWE) • NSW Office of Environment and Heritage (now DPE EES)
Traffic and Access CEMP	The Traffic and Access CEMP will be prepared in consultation with the NSW Roads and Maritime Services.	Table 28-8	<ul style="list-style-type: none"> • NSW Roads and Maritime Services (now Transport for NSW (TfNSW)) • Penrith City Council • Liverpool City Council
Air Quality CEMP	The Air Quality CEMP will be prepared in consultation with the NSW Environment Protection Authority and NSW Health.	Table 28-10	<ul style="list-style-type: none"> • NSW EPA • NSW Health.
Aboriginal Cultural Heritage CEMP	The Aboriginal Cultural Heritage CEMP will be prepared in consultation with Aboriginal stakeholders, the NSW Office of Environment and Heritage and other relevant Australian and local government bodies.	Table 28-12	<ul style="list-style-type: none"> • NSW Office of Environment and Heritage (now DPE EES) • Penrith City Council • Liverpool City Council • Aboriginal Affairs NSW • Aboriginal Stakeholder groups

CEMP	Requirement	EIS Reference	Agency consulted
European and Other Heritage CEMP	The European and Other Heritage CEMP will be prepared in consultation with the NSW Office of Environment and Heritage and other relevant Australian and local government bodies.	Table 28-14	<ul style="list-style-type: none"> • NSW Office of Environment and Heritage (now DPE EES) • Penrith City Council • Liverpool City Council
Waste and Resources CEMP	The Waste and Resources CEMP will be prepared in consultation with the NSW Environment Protection Authority and relevant local councils	Table 28-16	<ul style="list-style-type: none"> • NSW EPA • Penrith City Council • Liverpool City Council • Department of Finance, Services and Innovation Waste Services
Visual and Landscape CEMP	The Visual and Landscape CEMP will be prepared in consultation with the NSW Department of Planning and Environment and relevant local councils	Table 28-18	<ul style="list-style-type: none"> • NSW Department of Planning and Environment • Penrith City Council • Liverpool City Council • The Government Architect
Community and Stakeholder Engagement Plan	The Community and Stakeholder Engagement Plan will be prepared in consultation with the NSW Department of Premier and Cabinet	Table 28-20	<ul style="list-style-type: none"> • NSW Department of Premier and Cabinet (DPC)

1.4 Certification and Approval

This SEMF has been reviewed and approved by the WSA Environment Manager prior to submission to the Department of Infrastructure, Transport, Regional Development and Communication (Infrastructure Department).

1.5 Distribution

All WSA personnel and contractors will have access to the Construction Plan and the component SEMF via the project document control management system. An electronic copy of the Construction Plan and its sub-plans can be found on the project website - <https://westernsydney.com.au>.

This document is uncontrolled when printed. One controlled hard copy will be maintained by the Quality Manager at the Project office.

Registered copies will be distributed to the relevant project positions listed in the distribution table at the front of the Construction Plan.

2 Project Description

The Construction Plan details the construction staging of the Stage 1 Airport Development.

The delivery of the Stage 1 Airport Development will be through a packaging strategy with a wide variety of package sizes, risk profiles and contracting entities. Each package will have different levels of environmental risk and environmental obligations, depending on the scope of works, location of works and sensitivity of the receiving environment and cultural heritage issues and relevant statutory requirements and obligations.

The Project, Stage 1 Airport Development, comprises the following key features as described in the Construction Plan (which is consistent with the Airport Plan and EIS Chapter 5):

- Site preparation
- Utilities
- Ancillary developments
- Terminal
- Airside
- Ground transport
- Other building activities
- Aviation support facilities

The work packages covered by the SEMF (and associated CEMPs) and details of the Project construction activities, staging and programming are included in Section 6 of the Construction Plan (WSA00-WSA-00000-CN-PLN-000001) as required by the Airport Plan Condition 1(5).

The SEMF applies to all phases of works as described in Section 6 of the Construction Plan.

3 Environmental Management

3.1 Environmental Obligations

All personnel have the following general obligations with regards to environmental management:

- Take all feasible and reasonable steps to ensure compliance with the requirements of this SEMF, CEMPs and other approved Plans;
- Minimise pollution of land, air and water;
- Preserve the natural and cultural heritage environment where required and opportunity exists;
- Be a good neighbour to surrounding land users;
- Use equipment with noise control features where available and ensure that it is properly maintained;
- Minimise the occurrence of offensive noise;
- Minimise impact on the local traffic network and adhere to traffic management measures as required;
- Use the provided pollution control equipment as required and maintain it in proper working order;
- Give notice to WSA of any known or potential heritage discovery. WSA to determine the nature of the find and its management/curation and notify relevant authorities and/or other relevant stakeholders;
- In the instance of an environmental incident, notify WSA as soon as reasonably practicable; and
- Keep the community informed of work milestones, upcoming activities and duration of relevant aspects of the works.

3.2 Environmental Legal and other Requirements

The WSI will be located on land owned by the Commonwealth within the state of NSW. Section 96 C(3) of the Airports Act provides for development of the airport in accordance with the Airport Plan. Section 112 of the Airports Act provides that Part 5 of the Airports Act applies to the exclusion of a law of state relating to land use planning or the regulation of building activities.

Relevant environmental legislative and other requirements are summarised in the Environmental Legal and other Requirements Register (Appendix L).

The Environmental Legal and other Requirements Register will be formally reviewed and updated as required by the WSA Environment Manager (or nominated delegate) at 12-monthly intervals as a minimum or following a change in legislation (or other relevant requirement). Any relevant changes made to the Environmental Legal and Other Requirements Register will be communicated to the appropriate WSA personnel and contractors through toolbox talks or specific training where required (refer to Section 5 for training details).

As the Airport Site is to be developed in accordance with the Airport Plan determined under the Airports Act, some state laws will not be applicable to the project (s112 of the Airports Act). Where state laws are not applicable, there may nonetheless be a requirement to have regard to those laws, for example, through mitigation measures in approved CEMPs to satisfy conditions of the Airport Plan. Specific details with regards to legal and other consideration for individual environmental aspects are considered in further detail in the respective CEMP and other Approved Plans.

Section 3.11.2 of the Airport Plan details the conditions that must be satisfied prior to commencement of Main Construction Works for the Stage 1 Airport Development including the requirement for a Construction Plan, nine CEMPs, the CSEP; and a Sustainability Plan.

3.3 Preparatory Activities

During the Stage 1 Airport Development, Preparatory Activities will be required to be conducted that are not specified in the approved Construction Plan, CEMPs or other Approved Plans. Activities will only proceed once assessed as not to be inconsistent with the Approved Plans. Particular mitigation measures that will be applied to Preparatory Activities will be identified in the Preparatory Activities Approval Form (PAAF) as appropriate and submitted by the contractor to WSA for approval. The definition of Preparatory Activities as provided in the Airport Plan includes the following:

- a. day-to-day site and property management activities;
- b. site investigations, surveys (including dilapidation surveys), monitoring, and related works (e.g. geotechnical or other investigative drilling, excavation, or salvage);
- c. 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);
- d. enabling preparatory activities such as:
 - i) demolition or relocation of existing structures (including buildings, services, utilities and roads);
 - ii) the disinterment of human remains located in grave sites identified in the European and other heritage technical report in Volume 4 of the EIS; and
 - iii) application of environmental impact mitigation measures; and
- e. any other activities which an Approver determines are Preparatory Activities for this definition.

Prior to commencing any Preparatory Activities, details of the activities would be documented on the PAAF (refer Appendix A). The PAAF should include a description of the activities to be undertaken, proposed timing and environmental monitoring and control measures. The activities will only be approved if they are determined to be consistent with Approved Plans. The PAAF would include:

- Mitigation measures and controls that can be applied on-site to avoid or minimise negative environmental impacts;
- Mechanisms for compliance with applicable policies, approvals, licences, permits, consultation agreements and legislation;
- A description of environmental and heritage management related roles and responsibilities of personnel; and
- A monitoring regime to check the adequacy of controls as they are implemented, and a process to implement corrective actions to ensure continual improvement.

The PAAF is to be submitted to the WSA Environment Team for review and for WSA Environment Manager (or delegate) approval prior to commencing work.

3.4 WSA Approvals and Permits

WSA will implement permit systems and processes as tools to assist in the management and control of works that have the potential to impact the environment and heritage. Such activities applicable to the work packages described in the CEMPs include dewatering, works within protected and no-go areas, initial land disturbance activities (e.g. clearing or stripping of in-situ topsoil, out of hours works and material importation).

The following permit requirements will be implemented during the delivery of the Stage 1 Airport Development:

- Dewatering Permit;
- Land Disturbance Permit;

- Out of Hours Works Permit;
- Permit to Enter Protected or No-Go Area (e.g. heritage, biodiversity, contamination etc)
- Minor Environmental Assessments and;
- And other forms as described within this procedures appended to this SEMF

A register of all permits issued will be maintained by WSA.

Prior to approving these permits, assessment considerations include:

- Obligations including but not limited to Conditions as per Section 3.11.2 of the Airport Plan, and TfNSW specifications for relevant external road related construction activities;
- Work techniques or methodologies and associated project procedures;
- Consider whether proposed changes to activity/modification are consistent with the approved project; and
- Need for external approvals or permits, e.g. NSW Environment Protection Authority (EPA), and Fisheries NSW etc.

3.4.1 Dewatering Permit

The Dewatering Permit applies to offsite water discharge, pumping to land in the Stage 2 Area and any water movement across construction work package boundaries. The Dewatering Permit shall document measures to avoid pollution, pump location/ sizes, release qualities / limits, locations of approved release points (including mark up of WSA issued drainage network plan), and monitoring of discharge. The Dewatering Permit will be submitted to the WSA Environment Team for review and approval by the WSA Environment Manager (or nominated delegate) prior to discharge occurring.

Where Contractors need to pump water internally within their work package site, the Contractor will manage the dewatering permit process.

The Dewatering Permit Form can be found in Appendix B.

3.4.2 Land Disturbance Permit

The Land Disturbance Permit (**LDP**) will be used to identify environmentally sensitive areas and utilities in proximity to construction activities. It shall cover all clearing, initial land disturbance (i.e. removal of in-situ / original topsoil and earthworks activities and shall document environmental aspects control measures relevant to the area. The LDP will be submitted to the WSA Environment Team for review and approval by the WSA Environment Manager (or nominated delegate) prior to commencing work. Where vegetation removal is required, an ecological assessment will be prepared and included with the permit. The ecological assessment should record the quantity of threatened vegetation to be removed, habitat trees and any flora/fauna that is required to be removed or relocated, refer to the Biodiversity CEMP for more information. For works in new areas, where a LDP is not applicable (i.e. excavations or ground disturbance where earthworks has been completed, an Environmental Control Map will need to be approved prior to the works commencing

The Land Disturbance Permit Form can be found in Appendix C.

3.4.3 Out of Hours Work Permit

The WSA Out of Hours Works (**OOHW**) Procedure shall be implemented and an OOHW Permit shall be completed for all required out of hours works in accordance the Noise and Vibration CEMP. The OOHW Permit shall include measures to reduce impacts, location of equipment to minimise impacts, review of adjacent construction package works out of hours works (including using the Package Out of Hours Status Tracker – Attachment A of the OOHW Procedure (if applicable)), and proposed noise monitoring of out of hours work.

The OOHW Permit will be submitted to the WSA Environment Team for review and approval by the WSA Environment Manager (or nominated delegate) prior to commencing work.

Any OOHW that involves road closure also requires consultation with the WSA Comms Team prior to lodgement, as well as associated approvals such as Road Occupancy Licenses (if required).

The OOHW approval will consider the suitability of mitigation measures where there is the potential for cumulative impacts to occur with Sydney Metro works. This will be undertaken in accordance with the Cumulative Impacts Plan and OOHW procedure.

The OOHW Permit Form can be found in Appendix D and the OOHW Procedure in Appendix S.

3.4.4 Permit to Enter Protected or No-Go Area

Entry into protected areas (e.g. areas with protected heritage or biodiversity values) or no-go (restricted) areas (e.g. contaminated land) shall be avoided at all times. However, should entry be required, a Permit to Enter Protected or No-Go Area must be prepared by the Contractor. The Permit shall include details of the proposed works, measures to avoid or minimise environmental impacts, and identify any consultation requirements. The Permit will be submitted to the WSA Environment Team for review and approval by the WSA Environment Manager (or nominated delegate) prior to entry to any protected or no-go area.

A Permit to Enter is not an approval to undertake construction works. Works cannot be undertaken without planning approval (ALC Consent) and a building activity approval (Works Permits, Building Permit or Exemption Permit) from the Airport Building Controller (ABC).

The Permit to Enter Protected or No-Go Area Form can be found in Appendix E.

3.4.5 Minor Environmental Assessment

A Minor Environmental Assessment (MEA) is required when a design, construction or operational change to the project is identified. The MEA considers whether a proposed change is consistent with the EIS, Airport Plan, Construction Plan and CEMPs, or whether a modification/variation or a new approval is required. A MEA may also be prepared to demonstrate that the planning approval mechanism in the Airport Plan is applicable to the works, and that the works are consistent with the CEMPs.

. The MEA will be submitted to the WSA Environment Team for review and approval by the WSA Environment Manager (or nominated delegate) prior to the implementation of the change.

The Minor Environmental Assessment Procedure can be found in Appendix F.

3.5 Environmental Aspects and Impacts

Each of the nine CEMPs includes an Environmental Risk Assessment, which identifies environmental aspects, impacts and control measures associated with construction activities. The environment risk assessments determine the severity and likelihood of an activity's impact on the environment and to prioritise its' significance. This process has considered potential regulatory and legal risks as well as the concerns of community and other key stakeholders and was based on AS/NZS ISO 31000:2018, the Australian and NZ Standard for risk management.

Environmental risks are reviewed and updated where required in conjunction with each CEMP review.

The WSA Environmental Aspects, Impacts and Risk Procedure can be found in Appendix G.

3.6 Environmental Policy

The WSA Environmental Policy (Appendix H) describes WSA's commitment to continual improvement in environmental performance and compliance with applicable legal and other requirements. WSA's Environmental Policy is displayed at site offices and communicated to staff and other interested parties via inductions and ongoing awareness programs.

All contractors / suppliers for the project are required to adhere to WSA's Environmental Policy.

3.7 Objectives and Targets

As a means of assessing environmental performance during construction, environmental objectives and targets have been established. These objectives and targets have been developed taking into account the Airport Plan condition requirements and the consideration of key issues identified through the environmental assessment and risk assessment process. The objectives and targets are consistent with the Airport Plan and WSA's Environmental Policy and will assist in measuring whether the commitments of the Policy are being met.

The aspect specific objectives and targets are incorporated into the Construction Plan, CEMPs and other approved Plans. Performance against the objectives and targets will be documented in the Airport Plan condition compliance reports (refer Section 8.3.4) and at least on an annual basis as part of the management review (refer Section 8.3.5). Performance criteria are assigned to each target and documented for objectives and targets in each CEMP.

High level environmental objectives and targets for the construction of the Stage 1 Airport Development of are provided in Table 2.

Table 2: Environmental Objectives and Targets

Objective	Target	Measurement Tool
To meet the full range of environmental requirements identified in the environmental management framework and any other environmental conditions in the Airport Plan	Full compliance.	Audits Compliance reporting Management reviews Compliance assessments
To ensure that all identified environmental impacts and issues are appropriately managed and mitigated during construction of the airport, including though the identification of contingencies should unexpected adverse outcomes occur, or control measures are found to be inadequate	No regulatory infringements.	Weekly inspections Monitoring requirements in accordance Section 8 and as detailed in the CEMPs Audits Compliance reporting
To promote continual improvement in environmental performance	Address non-conformances and corrective actions within specific timeframes.	Audits Management reviews CSEP
To provide a comprehensive framework for the development and implementation of detailed environmental management measures through CEMPs and other Approved Plans	Efficient delivery of best practice.	Compliance reporting Management review. CSEP
To ensure that controls are properly implemented, regularly monitored and audited to assess their effectiveness	Develop and maintain a program of ongoing environmental training. Capture lessons learnt from environmental events to minimise repeat issues. Encourage and reward innovation and effort throughout the workforce.	Weekly inspections Compliance reporting Management review

3.8 Variation of Approved Plans

WSA will seek approval for variation of an Approved Plan from the Infrastructure Minister or an SES Officer (SES employee under the *Public Service Act 1999*) in the Infrastructure Department by submitting a version of the Plan with the proposed variation clearly marked. All variations to an Approved Plan must be approved in accordance with Condition 49 of the Airport Plan. As each package of work is developed the SEMF and associated CEMPs will be reviewed and where applicable updated to ensure the environmental aspects of the work package are documented and managed. Where required the Plans will be updated and submitted for approval in accordance with the Airport Plan prior to the work commencing.

The Infrastructure Minister or an SES Officer in the Infrastructure Department may vary an Approved Plan or request. WSA must prepare and seek approval for a specified variation if the Infrastructure Minister or an SES Officer in the Infrastructure Department believes on reasonable grounds that:

- A Condition has been contravened and the nature of the contravention is relevant to the subject matter of the Approved Plan; and
- The variation will address the contravention.

WSA will comply with any such request within three months.

3.9 Review of Approved Plans

As per the WSA EMS, review of all Approved Plans will be undertaken annually to ensure they continue to meet conditions set out in Section 3.11.2 of the Airport Plan (refer Condition 47). If the review identifies areas where the plan does not continue to meet the approval criteria for that Plan, a variation to the Approved Plan will be prepared and submitted for approval.

Under Condition 49 (4) of the Airport Plan, WSA is also required to review each Approved Plan at least every five years (from the date of approval). Findings of this review will be included in the Annual Report (refer Section 8.3 of the SEMF) and if needed, a variation to the Approved Plan will be prepared and submitted for approval.

Additionally, WSA may initiate reviews of Approved Plans at other times in response to improvement opportunities, non-conformances, and changes to scope of work or construction methodology or alterations to legal or contractual requirements.

Any changes identified and implemented through the variation and review process identified above will be communicated to relevant contractors through re-issue of the revised WSA Approved Plan and subsequent training and awareness (refer Section 4).

3.10 Publication of Approved Plans

Consistent with Airport Plan Condition 50, WSA will publish each Approved Plan on its website (<https://westernsydney.com.au>) within one month of them being approved.

The Approved Plans will be maintained on the website until the end of the construction period.

4 Implementation and Operation

4.1 WSA Environmental Management Framework

This SEMF is a WSA framework which sets out WSA's environmental management requirements for construction of the Stage 1 Airport Development. It forms a linking document between the requirements of the Airport Plan and the nine CEMPs prepared for each environmental aspect. WSA Contractors will be required to implement and adhere to the requirements of the Construction Plan, the SEMF, nine CEMPs and other Approved Plans.

The structure of the Environmental Management System (EMS) for the Stage 1 Airport Development is shown in **Figure 1**.

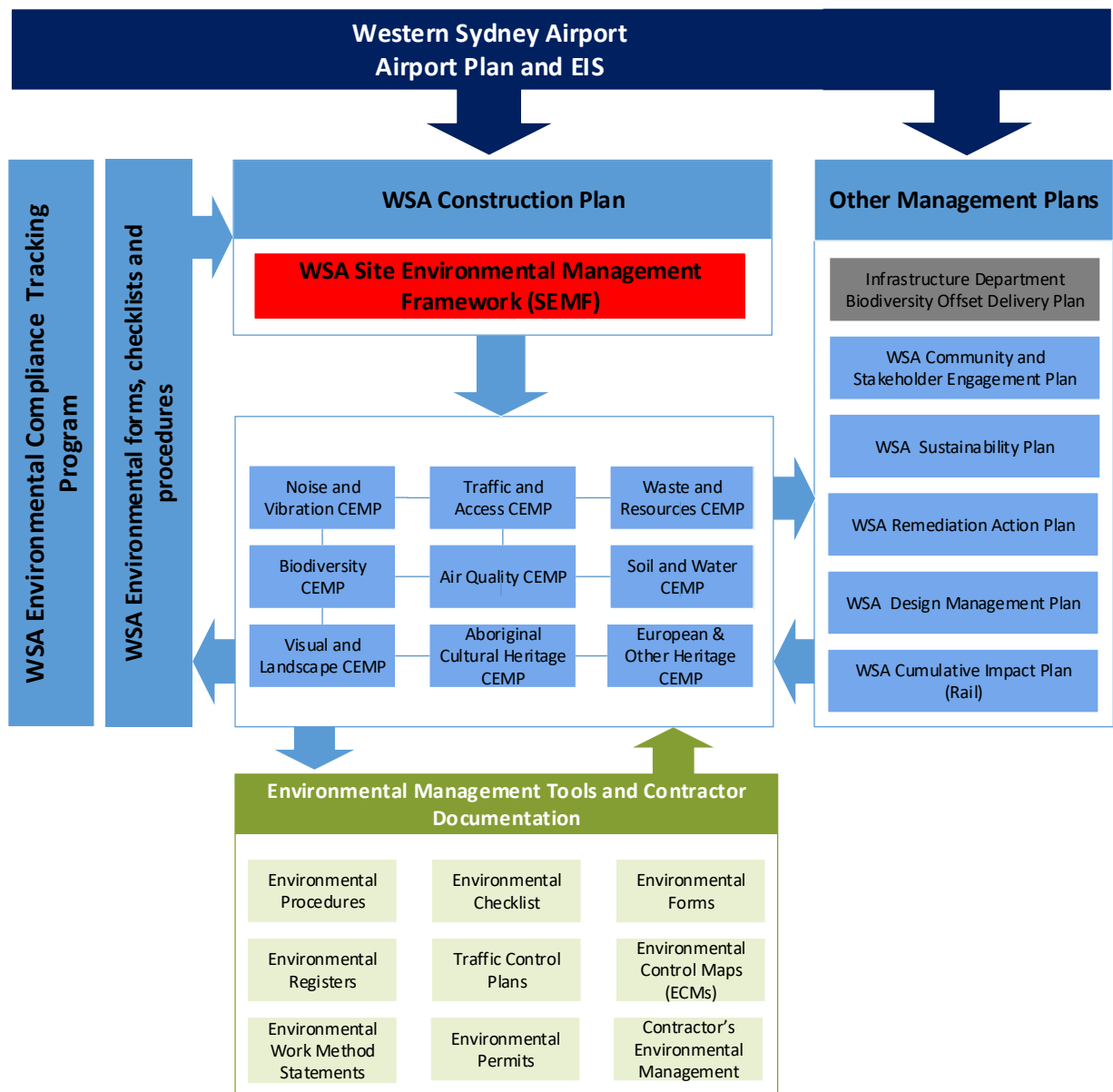


Figure 1: WSA EMS Structure

4.2 CEMPs and other Approved Plans

The nine Approved CEMPs address Airport Plan Condition requirements specific to the Project activities described in the Construction Plan. They address environmental risks associated with each activity and document the required management and mitigation measures, and monitoring requirements. A list of CEMPs and other Approved Plans for the construction phase of the Stage 1 Airport Development, and their document numbers is provided below in Table 3. Refer to the individual CEMP documents as referenced below for further details on document scope, purpose, mitigation measures and controls, roles and responsibilities.

Table 3: CEMPs and Other Approved Plans

Document name	Document Reference
Noise and Vibration CEMP	WSA00-WSA-00400-EN-PLN-000002
Biodiversity CEMP	WSA00-WSA-00400-EN-PLN-000003
Soil and Water CEMP	WSA00-WSA-00400-EN-PLN-000004
Traffic and Access CEMP	WSA00-WSA-00400-EN-PLN-000005
Air Quality CEMP	WSA00-WSA-00400-EN-PLN-000006
Aboriginal Cultural Heritage CEMP	WSA00-WSA-00400-EN-PLN-000007
European and Other Heritage CEMP	WSA00-WSA-00400-EN-PLN-000008
Waste and Resources CEMP	WSA00-WSA-00400-EN-PLN-000009
Visual and Landscape CEMP	WSA00-WSA-00400-EN-PLN-000010
Construction Plan	WSA00-WSA-00400-EN-PLN-000001
Community and Stakeholder Engagement Plan	WSA00-WSA-00400-PM-PLN-000001
Sustainability Plan	WSA00-WSA-00000-SS-PLN-000001
Crisis Management Plan	WSA00-WSA-00000RI-PRO-000005
Emergency and Incident Response Plan	WSA00-BECHTEL-00000-SF-PLN-000003
Remediation Action Plan	WSA00-WSA-00400-EN-PLN-000001
Design Management Plan	WSA00-WSA-00000-DM-PLN-000001
Cumulative Impacts Plan (Rail)	WSA00-WSA-00400-EN-PLN-000013

4.2.1 WSA Environmental Procedures and Protocols

WSA has developed and implemented its own procedures to support the activities identified in Section 6 of the Construction Plan. These include:

- Unexpected Finds Protocols Procedure (Appendix I);
- Environmental Incident Classification and Reporting Procedure (Appendix J);
- Emergency Spill Response Procedure (Appendix Q);
- Dust Management, Vehicle and Equipment Emissions Plan (Appendix to the Air Quality CEMP);
- Waste Classification Procedure (Appendix R);
- Environmental Aspects, Impacts and Risk Procedure (Appendix G);
- Material Import Form (Appendix T) and Material Import Procedure (Appendix V);

- Biodiversity Management Protocols (Appendix to the Biodiversity CEMP); and
- Out of Hours Works Procedure (Appendix S).

4.2.2 WSA Environmental Forms, Checklists and Registers

WSA will develop and implement its own forms, checklists and registers to support the activities identified in the Construction Plan Section 6. These include:

- Preparatory Activities Approval Form (Appendix A);
- Environmental Inspection Checklist (Appendix K);
- Legal and Other Requirements Register (Appendix L);
- Recordable Event Report Template (Appendix M);
- Environmental Control Map Review Checklist (Appendix N);
- Example Waste management Register (Appendix to the Waste and Resources CEMP); and
- Material Import Approval Form (Appendix T).

Additional forms, checklists and registers may be developed to support this framework (refer Section 3.4 for Permit Forms).

4.2.3 Environmental Control Maps

Environmental control maps (**ECMs**) identify the location of environmental aspects and the physical protection measures, work method controls and monitoring requirements needed to minimise the impact of activities on the environment, cultural heritage and community in and adjoining a specific work area.

ECMs are prepared by the Contractors construction team and should involve the Environmental Coordinator, Foreman and Engineer (or delegates) to ensure a collaborative and inclusive approach to the management of environmental risks. The mitigation measures included in the applicable CEMPs and other Plans should be included in the ECM.

The ECMs are to be reviewed and updated as the work area changes and included in permit applications where applicable.

The content of an ECM should include, as applicable, the following:

- The worksite layout and boundary, including entry/exit points and internal roads;
- North point, legend, scale, names of major roads and landmarks;
- Details of key environmental and heritage risk issues and the specific mitigation measures;
- Location of environmentally sensitive areas (e.g. threatened species, critical habitat, contaminated areas (including any areas where contamination has been capped and contained in accordance with the WSA Remediation Action Plan), heritage no go zones, etc);
- Contours/elevation points and/or direction of slope/s;
- Key project traffic routes within and adjacent to the worksite and key traffic management measures (traffic controllers, cueing zones, warning signs, etc.);
- Location of adjoining land-use and nearest noise sensitive receivers;
- Dust control measures;
- Location and type of sediment and erosion control measures, including size/capacity of detention basins and wheel wash facilities;

- Location of monitoring equipment (e.g. dust, noise, vibration monitors) and frequency of monitoring/inspections;
- Location of site offices;
- Vegetation and trees to be protected;
- Vegetation and trees to be removed, with any actions required prior to felling;
- Location of worker car parking and any parking restrictions;
- Location of known heritage;
- Location of spill containment and clean-up equipment;
- Location of stormwater drainage and watercourses leading to/from the worksite;
- Location of worksite waste management facilities;
- Restrictions on certain activities (e.g. rock breaking, driven piling, blasting);
- Key stages and timeframes for the works;
- Contact details (including after hours) for key staff (including Environment Manager and Construction Manager);
- Hours of work applicable to the worksite;
- Construction Response Line number; and
- Document control and approval details.

The ECMs are to be submitted to the WSA Environment Team for review and WSA Environment Manager (or nominated delegate) for approval prior to commencing work. The Environment Team shall use the ECM review checklist in Appendix N.

Once approved by WSA, the ECM should be displayed in site sheds and included in workpacks for reference by the workforce, and relevant details included in toolbox talks and pre-starts.

Contractors must review the ECMs periodically to ensure the effectiveness of implementation and to incorporate any improvements or changes identified into subsequent revisions. For permit applications, the ECM will be tailored specific to the works.

4.2.4 Environmental Work Method Statements

Environmental Work Method Statements (**EWMS**) detail a specific construction methodology and environmental mitigation and management measures for a high-risk activity or area, e.g. working over water or adjacent to/in an Environmental Conservation Zone (**ECZ**).

EWMS will be prepared prior to the commencement of relevant construction activities and will incorporate relevant mitigation measures and controls, including those from CEMPs and other Plans. They also identify key procedures to be used concurrently with the EWMS. EWMS are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions for managing the high-risk activity.

EWMS for activities likely to be considered high risk include:

- Site compound establishment and operation including satellite compounds;
- security and safety fencing;
- early installation of environmental protection measures;
- access / haul roads;

- plant delivery, transport and maintenance;
- construction sediment basin installation and management;
- construction sediment basin decommissioning;
- weed management;
- waste management;
- sourcing and management of construction water;
- dewatering, including across Site boundaries;
- services relocation;
- culvert construction;
- general earthworks;
- stockpiling areas;
- ground disturbance;
- utilities relocation and installation; and
- piling.

Each EWMS must include at least the following elements:

- Description of the work activity, including any plant and equipment to be used;
- Outline of the sequence of tasks for the activity, including interfaces with other construction activities;
- Identification of any environmental and / or socially sensitive areas, sites or places;
- Identification of potential environmental risks / impacts due to the work activity;
- Mitigation measures to reduce the identified environmental risk, including assigned responsibilities to site management personnel; and
- Process for assessing the performance of the implemented mitigation measures.

All construction personnel and sub-contractors undertaking a task governed by an EWMS must participate in training on the EWMS and acknowledge that they have read and understood their obligations by signing an attendance record prior to commencing work.

Regular monitoring, inspections and auditing of compliance with the EWMS will be undertaken to ensure that all controls are being followed and that any non-conformances are recorded, and corrective actions implemented.

EWMS are to be prepared by the contractor and submitted to the WSA Environment Team for review and WSA Environment Manager (or nominated delegate) for approval prior to the commencement of the activities.

The contractor must review the EWMS periodically to ensure the effectiveness of its implementation and to incorporate any improvements or changes identified into subsequent revisions.

4.2.5 Erosion and Sediment Control Plans

Erosion and Sediment Control Plans (**ESCPs**) are clearly show the site layout and the approximate location of erosion and sediment control structures onsite. They are developed progressively and cover all construction stages from initial vegetation clearing through to rehabilitation when erosion and sediment controls are no longer required and are removed. ESCPs will be developed and implemented across the Project where there is a risk of erosion and sediment loss.

ESCPs may be prepared in conjunction with ECMs to provide more detailed site-specific environmental mitigation measures and will be prepared in accordance with the requirements of the Soil and Water CEMP.

ESCPs will be developed by Contractor environment staff in consultation with the Superintendent, Site Engineers, Foreman and other relevant site personnel, as required. They will be modified to reflect site condition at the time of construction.

ESCPs are to be prepared by the contractor and submitted to the Environment Team for review and WSA Environment Manager (or nominated delegate) for approval prior to the commencement of the activities. ESCPs will be developed for all applicable work areas prior to commencing activities.

4.3 Contractor Environmental Management

Contractors engaged to carry out works for WSA will prepare and implement environmental management documents to demonstrate compliance with the requirements of the WSA SEMF and CEMPs. All Contractor environmental management documentation will be submitted to WSA for review and no work is to commence on the subject works until accepted by WSA.

4.3.1 Contractor Environmental Procedures

Environmental Procedures are tools to document an environmental process. They include procedures, protocols and strategies developed for a specific scope of works.

The Contractor will implement its own environmental procedures that will include details of the relevant legislative requirements and guidelines, and the process to be followed for a particular task.

Refer to CEMPs for environmental procedures that should be prepared and must be implemented as a part of the Contractor environmental management framework (CEMF).

4.4 Roles and Responsibilities

4.4.1 External Roles and Responsibilities

Environment Minister (or an SES Employee in the Environment Department)

- The Approver for the Biodiversity Offset Delivery Plan;
- On 24 August 2018 the Approver approved the Biodiversity Offset Delivery Plan in accordance with Condition 30 of the Airport Plan;
- Required to be included in the consultation process for the Biodiversity CEMP and the Soil and Water CEMP (in accordance with Condition 35 of the Airport Plan); and
- The Environment Department receives notification regarding publication of Annual Reports under Condition 47 and copies of independent audits under condition 48 of the Airport Plan.

Infrastructure Minister (or an SES Employee in the Infrastructure Department)

- The Approver for the Construction Plan, CEMPs, CSEP and the Sustainability Plan;
- Approver for variation of an Approved Plan;
- Review and approve other matters (excluding Biodiversity Offset Delivery Plan); and
- The Infrastructure Department is responsible for administering and enforcing the Airports Act.

Airport Environment Officer

The responsibilities of the Airport Environment Officer (**AEO**) include the following:

- Monitoring compliance with the AEPRs;

- Facilitate an understanding of the obligations of the AEPRs;
- Ensure the best possible outcomes are achieved;
- Complete site inspections to review monitoring requirements and completion of works;
- Review and comment on CEMPs, incidents, and remedial activities;
- Issue an Environmental Protection Order in accordance with Part 7 of the AEPR; and
- Issue an Infringement Notice in response to an offence against the AEPR.

4.4.2 WSA Roles and Responsibilities

WSA team members have an obligation to protect the environment through carrying out their work with due diligence. All WSA members must:

- Comply with the requirements of the SEMF and associated CEMPs as they apply to the type of work the employee is involved in;
- Report all events or activities that may result in environmental harm; and
- Implement appropriate measures to control environmental risks.

In addition to these, environmental responsibilities specific to key roles are listed below.

More details for each role are included in the WSA position descriptions.

Chief Executive Officer

- Provide resources to ensure compliance with SEMF and CEMPs is achieved;
- Approval, or nominate a delegate, for the CEMPs for issue;
- Mandate and ensure that environmental protection remains an integral element of all Project activities;
- Provide the leadership and direction whereby environmental protection is and remains an integral element of all project activities; and
- Provide required resources to ensure the delivery of the SEMF and CEMPs to manage the environment and prevent pollution.

Environment Manager

- Establish the Environment Policy;
- Establish environmental objectives and targets;
- Develop and support strategies to meet these objectives and targets;
- Encourage environmental innovation and ensure that environmental initiatives are incorporated in the approach to project management and performance;
- Coordinate ongoing training in environmental awareness for all levels of WSA staff;
- Coordinate and manage the preparation of the project's SEMF and associated CEMPs;
- Review environmental legislation and communicate relevant information to the wider team;
- Develop and review internal environmental documents for WSA (e.g. reports, newsletters, procedures etc);
- Assist in the development and management of tasks to ensure statutory requirements relating to environmental management and performance are met;
- Ensure compliance of activities with the SEMF and associated CEMPs;

- Obtain and comply with all necessary environmental approvals / licences;
- Implement, maintain, monitor, report and advise the Executive General Manager on all environmental management matters;
- Liaise with the AEO and Infrastructure Department on environmental matters;
- Liaise with external stakeholders, e.g. EPA, DPE, local councils;
- Complete environmental reporting as required by the SEMF and CEMPs to meet the Airport Plan requirements and submit to the Approver and stakeholders as required;
- Ensure WSA, Delivery Partner and Contractors comply with all environmental statutes, regulations, rules, procedures, standards, policies and permit requirements as outlined in this plan;
- Monitor the implementation of all environmental management requirements both legislative and as identified in the SEMF and CEMPs;
- Ensure that an appropriate environmental induction and training program is developed such that personnel are aware of their environmental responsibilities under relevant legislation and the contract, including the requirements associated with each of the nine CEMPs;
- Ensure the timely review and assessment of environmental monitoring, auditing and inspection outcomes to ensure identification and implementation of continual improvement with regards to environmental management;
- Ensure project Contractors comply with all relevant statutes, regulations, rules, procedures, standards and policies as detailed in the nine CEMPs;
- Ensure that environmental records are maintained;
- Ensure that all environmental incidents and events are reported, investigated and corrective action taken to prevent recurrence;
- Ensure that all relevant employees and Contractors receive environmental inductions and ongoing training as appropriate;
- Participate in regular workplace inspections to ensure compliance;
- Assist with environmental hazard and risk identification and elimination;
- Provide direction and guidance on implementation of the SEMF and CEMPs;
- Ensure all Contractors are informed of environmental management requirements;
- Monitor and take action to ensure environmental management requirements are implemented throughout the life of the project; and
- Approve environmental permits and forms (or as delegated) including; Preparatory Activity Approval Forms (PAAF), Minor Environmental Assessments (MEA), Dewatering Permit, Land Disturbance Permit (LDP), Out of Hours Works Permit, Permit to Enter Protected or No-Go Area, ECM and ESCP.

Sustainability Manager

The responsibilities of the Sustainability Manager are detailed in the Sustainability Plan and include supporting the delivery of environmental sustainability aspects as outlined in the WSA EMS.

Community and Stakeholder Manager

The responsibilities of the Community and Stakeholder Manager are detailed in the CSEP. Overall, the Community and Stakeholder Manager is responsible for supporting the relevant aspects to support compliance with the WSA EMS.

Wider WSA Team

The environmental responsibilities of the Wider WSA Project Team include (but are not limited to) the following:

- Comply with the relevant requirements of the SEMF and CEMPs, or other environmental management guidance as instructed by a member of the project's management;
- Participate in the mandatory project / site induction program;
- Report any environmental incidents to the foreman immediately or as soon as practicable if reasonable steps can be adopted to control the incident;
- Undertake remedial action as required to ensure environmental controls are maintained in good working order; and
- Stop activities where there is an actual or immediate risk of harm to the environment and advise the WSA Environment Manager.

4.4.3 WSA Delivery Partner Roles and Responsibilities

The WSA Delivery Partner is responsible for the coordination and management of Contractors ensuring all necessary planning approvals are implemented and environmental management activities and documentation are undertaken in accordance with WSA requirements.

The WSA Delivery Partner Environment Team is formed by qualified Environmental Coordinators and their responsibilities include (but are not limited to):

- Review and approval of environmental permits (where delegated) including; Dewatering Permit, Land Disturbance Permit, Out of Hours Works Permit, Permit to Enter Protected or No-Go Area, ECMs, and ESCPs;
- Review and advise WSA on Preparatory Activity Approval Forms (PAAF) and Minor Environmental Assessments (MEA);
- Monitor and take action to ensure environmental management requirements are implemented during construction of the Project;
- Ensure all Contractors are informed of environmental management requirements;
- Facilitate regular cross package environmental forums to identify project wide risk, share lessons learnt and collaboratively plan for the management of cumulative environmental impacts;
- Coordinate for all environmental incidents and events to be reported, investigated and corrective action taken to prevent recurrence;
- Maintain environmental records;
- Conduct ongoing training in environmental awareness;
- Ensure compliance with all environmental approvals and permit requirements;
- Conduct weekly environmental inspection (as delegate for the WSA Environment Manager) with the Contractors and others as required.
- Participate in AEO inspections, where required;
- Daily interaction and coordination with Contractor representatives to ensure their environmental management requirements are implemented;
- Work collaboratively with the WSA Environment Manager to ensure environmental outcomes are achieved and delegated responsibilities are fulfilled;

- Ensure that all CEMPs are effectively implemented by the Contractors as required;
- Ensure that the required monitoring and reporting, including environmental auditing, is undertaken and reported to WSA as required;
- Assist WSA with environmental information for WSA reporting as required by the SEMF, CEMPs to meet the Airport Plan requirements;
- Ensure that all necessary planning approvals, licenses and permits are obtained, as required by the CEMPs, prior to commencement of applicable works;
- Participate in design review to ensure environmental requirements are met;
- Provide direction and guidance on implementation of the CEMPs; and
- Liaise between Contractors and WSA as required and provide notification / information where environmental incidents / events have occurred.

4.4.4 Contractor Roles and Responsibilities

Each Contractor is to identify roles with the following responsibilities as a minimum within the Contractor CEMF.

- Liaise with government stakeholders and provide notification / information where environmental incidents / events have occurred;
- Monitor environmental performance through audits and review of the monthly environmental reports;
- Provide other information as required from time to time, in order to demonstrate to WSA that environmental management requirements are being met by the Contractor;
- Advise all personnel and Sub-contractors of their responsibilities under the CEMPs, CEMF and site-specific environmental issues;
- Coordinate the implementation of the CEMF;
- Identify resources required for implementation of the CEMF;
- Program toolbox talks and daily pre-start meetings to include environmental requirements where required;
- Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to WSA;
- Coordinate action in emergency situations and allocate required resources;
- Stop activities where there is an actual or immediate risk of harm to the environment and advise WSA;
- Undertake weekly environmental inspections, ensuring all works comply with relevant regulatory and project requirements;
- Maintain and update an Environmental Risk Register;
- Ensure that all environmental licences, approvals and permits are obtained and updated as required, and ensure that a legal and other requirements register is maintained;
- Report to WSA on environmental performance monthly;
- Ensure the requirement of this SEMF and associated CEMPs are fully implemented;
- Plan construction works in a manner that avoids or minimises impact to environment;
- Control field works and implement or maintain effective environmental controls, including through development of work method statements or similar;

- Ensure steps are taken to rectify and prevent future incidents from occurring;
- Oversee site monitoring, and undertake weekly environmental inspections and audits (refer Section 8.2);
- Develop and facilitate induction and other training programs relating to environmental requirements for all site personnel;
- Maintain a register of all project site inductions and environmental training;
- Manage an incident / event register and provide documentation on environmental incidents, non-conformance and corrective actions to WSA; and
- Coordinate for the Contractor to develop and submit for approval environmental permits including; Dewatering Permit, Land Disturbance Permit, Out of Hours Works Permit, Permit to Enter Protected or No-Go Area, Material Import, ECMs, and ESCPs.

5 Competence, Training and Awareness

5.1 WSA Training

To ensure this SEMF is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements within this Plan. The WSA Environment Manager will coordinate the necessary and relevant environmental training in conjunction with other training and development activities. The training will include:

- Specific training required by each CEMP;
- Information on changes to legal and other requirements;
- Shared information from other works;
- New environmental management initiatives; and
- Corrective actions to be implemented.

5.2 Contractor Training

WSA Environment Manager will review training content to be delivered by Contractors. This content will be developed and rolled out regularly. To ensure that environmental controls are effectively implemented, the Contractor is responsible for ensuring that all personnel reporting to them are aware of the requirements of the relevant CEMPs. Forms of environmental training may include:

- The project site induction, including environmental roles and responsibilities and incident reporting procedures;
- Toolbox talks;
- Pre-start meetings; and
- Environmental awareness training for specific issues.

The Contractor is to maintain a register of all project site inductions and environmental training carried out. Records of attendees at toolbox talks are to be kept on file.

5.2.1 Contractor Project Inductions

All personnel (including Sub-contractors) are to attend a site induction prior to commencing any work on site. The site induction includes an environmental component and ensures all personnel are aware of the environmental risks on site, the requirements of the CEMPs and their responsibilities around the implementation of environmental management measures.

The environmental component will include, but not be limited to, an overview of:

- Purpose and objectives of the project works package;
- Conditions of environmental licences, permits and approvals;
- Key environmental issues and responsibilities;
- Working hours;
- Mitigation measures for the control of environmental issues;
- Boundaries for vegetation clearing, location of exclusion zones, and other environmental constraints; and
- Incident management, response and reporting requirements.

Short-term visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times. A visitors' induction will also be undertaken for visitor's onsite for short periods as agreed with the WSA Safety Manager.

A WSA Induction and Training Register will be maintained at all times including the details of all personnel who have completed the WSA Project induction and any other pertinent environmental training and or awareness forums (workshops, presentations etc.).

5.2.2 Contractor Toolbox Talks, Training and Awareness

Toolbox talks or similar are proposed to be held weekly, or in response to an incident and will be used to raise awareness and educate personnel on issues related to aspects of construction, including environmental issues.

Environmental issues may include (but are not limited to):

- Erosion and sedimentation control;
- Incidents and spill response;
- Managing noise and amenity impacts;
- Threatened species, endangered ecological communities and protection of vegetation;
- Heritage and managing unexpected finds; and
- Improvements to existing procedures based on findings of environmental inspections, monitoring and audits (refer to Chapter 8).

For activities with high environmental risk (as identified through the Contractor's risk assessment), targeted environmental awareness training is to be provided. The content of targeted training may include the topics outlined above, or as otherwise required, dependant on the nature of construction activities and the type of impact and environmental risk.

The Environment Team and the Contractor is to maintain a register of environmental training. The register is to include a record of the topic, content, dates, names and signatures of personnel trained.

5.2.3 Contractor Daily Pre-start Meetings

Pre-start meetings will occur at the commencement of each shift. The pre-start meeting is a tool for informing the workforce of the day's activities, including information relating to the work schedule, safety, environment (including weather conditions) or other information that may be relevant to the day's work.

Environmental issues covered in the pre-start meeting include any aspect of the day's construction activities that may be impacted by, or may impact on, the environment. Risks and measures to manage those risks are to be discussed.

The Contractor is to record pre-start topics, dates delivered and a register of attendees.

5.2.4 Contractor Competency

Contractors are to maintain records of personnel competency in relation to key environmental responsibilities. For example, measures to ensure and record personnel understanding of training content (including induction) are to be implemented and records maintained.

Contractors are also to maintain records of relevant environmental qualifications, memberships etc for personnel with key environmental responsibilities. These records are to be maintained as project records and made available to WSA on request.

6 Environmental Incident and Emergency Management

All environmental incidents and emergencies must be reported to the WSA Environment Manager (refer Appendix J). The WSA Environment Manager will report to the Infrastructure Department and the AEO in accordance with Part 6 of the *Airports (Environment Protection) Regulations 1997* (AEPR). The AEPR Part 2 includes definitions of what is air, water and soil pollution and is outlined in Table 4.

Table 4: Definition of Pollution (AEPR 2018)

Aspect	Pollution definition
Air (AEPR Section 2.01)	<p>air pollution has occurred when a pollutant is present in air in a quantity, way, or condition, or under a circumstance, in which:</p> <ul style="list-style-type: none"> (a) harm is likely to be caused to the environment; or (b) unreasonable inconvenience is likely to be caused to a person: <ul style="list-style-type: none"> (i) at a place other than the immediate vicinity of the source of the pollutant; or (ii) if the source is in a place to which members of the public have access—in that place.
Water (AEPR Section 2.02)	<p>water pollution has occurred when waters contain a substance or organism:</p> <ul style="list-style-type: none"> (a) that causes, or is reasonably likely to cause, the physical, chemical or biological condition of the waters to be adversely affected; or (b) that causes, or is reasonably likely to cause, an adverse effect on beneficial use of the waters. <p>(2) For subregulation (1), waters contain a polluting substance if:</p> <ul style="list-style-type: none"> (a) the substance is dissolved in the waters; or (b) whether or not the substance is capable of uniformly mixing with water—it is: <ul style="list-style-type: none"> (i) suspended or otherwise dispersed in the waters; or (ii) floating on the surface of the waters; or (iii) deposited on the bed of the waters.

Aspect	Pollution definition
Soil (AEPR Section 2.03)	<p>soil pollution has occurred when land, including subterranean groundwater, is contaminated by a substance:</p> <ul style="list-style-type: none"> (a) that causes, or is reasonably likely to cause, the chemical or biological condition of the soil to be adversely affected; or (b) that causes, or is reasonably likely to cause, an adverse effect on present use of the land concerned, or a proposed use under a final master plan in force for the airport, because it is, or is reasonably likely to be: <ul style="list-style-type: none"> (i) unsafe or unfit for human habitation or occupation; or (ii) in any other respect, harmful to the health or welfare of human beings; or (iii) significantly offensive to human senses; or (c) that causes, or is reasonably likely to cause, an adverse effect on the land concerned, because: <ul style="list-style-type: none"> (i) the land supports native flora or fauna; and (ii) the substance degrades the capacity of the land to support the flora or fauna; or (d) that causes, or is reasonably likely to cause, an adverse effect on beneficial use of any subterranean groundwater; or (e) that causes, or is reasonably likely to cause, an adverse effect on beneficial use, of adjacent land in accordance with a final master plan in force for the airport.
Offensive Noise (AEPR Section 2.04)	<p>noise that is offensive occurs when noise is generated at a volume, or in a way, or under a circumstance, that, in the opinion of an airport environment officer, offensively intrudes on individual, community or commercial amenity.</p> <p>(2) In forming an opinion, an airport environment officer must have regard to:</p> <ul style="list-style-type: none"> (a) the volume, tonality and impulsive character (if any) of the noise; and (b) the time of day, and duration, of the noise; and (c) background noise levels at the time the noise is generated; and (d) the location, in relation to the source of the noise, of: <ul style="list-style-type: none"> (i) sensitive receptors; or (ii) if there is no affected sensitive receptor—commercial receptors; and (e) the excessive noise guidelines in Schedule 4. <p>(3) For subregulation (2): <i>commercial receptor</i> means a business operation, whether for profit, or not. <i>sensitive receptor</i> means: <ul style="list-style-type: none"> (a) a dwelling; or (b) an impermanent dwelling in a place designed, or reserved, for impermanent dwellings (for example, a caravan park or residential marina); or (c) a hotel, motel or hostel; or (d) a child care institution, kindergarten, school, college, university or other educational institution; or (e) a hospital, medical centre or nursing home; or (f) a building that is a church or similar place of worship. </p>

6.1 Environmental Incident Classification and Reporting

The WSA Environment Manager will monitor pollution levels in accordance with the requirements outlined in each CEMP. If monitoring discloses pollution, or excessive noise, occurring, WSA will provide within 14 days a written report to the AEO which includes the following (AEPR 6.04):

- a) The nature of the pollution, or excessive noise; and
- b) The location of the affected environment; and
- c) The date, and time, when the pollution, or excessive noise, occurred, or is likely to have occurred; and

- d) Details of remedial action WSA or other person has taken, or is taking, to prevent or minimise the pollution, or noise, and its recurrence.

The WSA Environment Manager will include a summary of incidents in the WSA Monthly Report (refer Section 8.3). This will include a review of environmental incidents to determine trends. Where trends are identified, the WSA Environment Manager will discuss preventative strategies with the Contractor to reduce the frequency of reoccurring incidents.

In addition to monthly reporting, details of all pollution incidents that have occurred during the reporting period for the Stage 1 Airport Development will be included in the six-monthly Compliance Tracking Reports and the Annual Compliance Report (refer Section 8.3.4).

Incident reporting and investigation requirements are documented in the Environmental Incident Classification and Reporting Procedure in Appendix J.

6.2 Contractor Environmental Incident Management and Reporting

Each Contractor for each phase of work for the Stage 1 Airport Development will develop and implement an Environmental Incident and Emergency Plan/Procedure, in accordance with the requirements of the Airport Plan. The procedure will include:

- Categories for environmental emergencies and incidents as per the Environmental Incident Reporting Procedure;
- Notification protocols for each category of environmental emergency or incident, including notification to WSA Environment Manager. For spills, protocols must include engagement with the WSA Environmental Advisor (as defined under the WSA Remediation Action Plan) to determine the requirements for validation inspection and sampling, along with requirements for waste classification sampling;
- Identification of personnel who have the authority to take immediate action to shut down any activity, or to affect any environmental control measure (including as directed by the AEO);
- A process for undertaking appropriate levels of investigation for all incidents and the identification, implementation and assessment of corrective and preventative actions; and
- Depending on the nature of the incident and the likelihood of potential or actual material harm to the environment, the regulatory authorities, e.g. AEO, Infrastructure Department, will be notified by the WSA Environment Manager.

The Contractor will make all personnel aware of the plan and their responsibilities.

Following formal notification of the incident to the WSA Environment Manager, an incident report detailing the cause of the incident and demonstrating corrective and preventative actions will be provided by the relevant Stage 1 Airport Development Contractor within 7 days of the incident or as agreed with the WSA Environment Manager. A summary of the incident will be provided in the Contractor monthly report (e.g. provision of a spill register).

7 Communication and Consultation

7.1 Internal Communication

Clear lines of communication throughout all levels and functions (e.g. management, staff and sub-contracted service providers) are key to minimising environmental impacts and achieving continual improvements in environmental performance.

The Environment Team (including the WSA Environment Manager) will meet regularly with project Contractors to discuss any issues with environmental management on site, the findings and outcomes of environmental inspections and audits, any amendments to environmental management plans that might be required or any new / changes to construction activities and general overall environmental performance.

WSA environmental personnel will also have the opportunity to participate in Contractor toolbox talks which will be undertaken on at least a weekly basis on site. This forum will provide an opportunity for the WSA Environment Team members to communicate on environmental performance, to advise on any upcoming sensitive environmental matters for future work areas and to receive feedback from on-site personnel.

Contractor's environmental personnel will coordinate and participate in toolbox talks on at least weekly basis. Contractor toolbox sessions will be used to communicate internal environmental matters and any matters advised by WSA.

Further internal communications regarding environmental issues and aspects will be through awareness training as described in Section 5.

7.2 External and Government Authority Communication

The WSA Environment Manager will be the main point of contact for both internal and external personnel and stakeholders regarding specific environmental issues. The WSA Environment Manager has the responsibility to report on the ongoing environmental performance of the work to Infrastructure Department the AEO and also to report any reportable incidents / events (as per Section 6) to the relevant government stakeholders. The WSA Environment Manager will also respond to AEO findings, advice or recommendations accordingly. The WSA Environment Manager will report regularly to the Infrastructure Department and the AEO on progress and any key environmental matters.

For further detail with regards to the consultation requirements with external stakeholders and government authorities, refer to the WSA CSEP.

7.3 Stakeholder and Community Communication

7.3.1 Community and Stakeholder Engagement Plan

Construction of the Stage 1 Airport Development will involve a number of interactions with local residents, local councils, Commonwealth and NSW Government agencies, among others. Whilst this SEMF outlines some of the key consultation requirements for particular issues (such as emergency and incident response), a Community and Stakeholder Engagement Plan (**CSEP**) has also been prepared to address broader stakeholder engagement objectives during construction..

The CSEP has been developed to guide and assist engagement activities for all environmental management issues during the construction phase, keeping the community and stakeholders informed of construction activities, and providing a process for the management of complaints about construction activities. The CSEP has been prepared in accordance with the requirements of Construction Condition No. 15 (Airport Plan, Section 3.11.2). The plan identifies opportunities for providing information and consulting with the community and stakeholders during the construction phase of the work.

7.3.2 Complaints and Enquires

All complaints and enquiries will be managed in accordance with the WSA CSEP which has been prepared in accordance with the requirements of the Airport Plan Condition No. 15 (Airport Plan, Section 3.11.2).

In summary, enquiries and complaints related to the construction activities will be referred to the 24-hour Community Information Line (1800 972 972). A postal address (PO BOX 397 Liverpool 1871) and email address (info@wsaco.com.au) has been provided for receipt of complaints and enquiries. The telephone number, the postal address and the email address will be published in newspapers circulating in the local area prior to the commencement of construction and is provided on the project website (<https://www.westernsydneyairport.gov.au/>).

The Community and Stakeholder Engagement Team will take the lead in responding to complainants. Attempts will be made to resolve all complaints in accordance with the CSEP.

The community contacts database will be used as a complaint register. The database will be used to record, track and respond to complaints efficiently. Information on all complaints received, the means by which they were addressed and whether resolution was reached shall be included in the construction compliance reports.

The WSA Environment Manager in consultation with the relevant Contractor where required, will apply an adaptive approach to ensure that corrective actions are applied in consultation with the appropriate construction staff to allow modifications and improvements in the management of any environmental issues resulting in community complaints.

8 Environmental Inspections, Monitoring, Auditing and Reporting

Monitoring, inspection and auditing will be undertaken to measure the effectiveness of environmental management and facilitate continual improvement of environmental controls and implementation of this SEMF, associated CEMPs, and to address approval requirements. Monitoring requirements specific to particular aspects (i.e. biodiversity, soil and water, air quality etc) are included in the relevant CEMPs. Environmental monitoring, inspection and auditing requirements are summarised in Table 5.

Table 5: Environmental Monitoring, Inspection and Auditing Requirements

Action	Scope	Timing	Responsibility
Pre-start inspection	Brief inspection of Contractor works including status of environmental controls prior to starting works.	Daily or prior to each shift	All Contractors
Close inspection	Brief inspection of Contractor works including status of environmental controls at completion of daily works.	Daily or at the completion of each shift	All Contractors
Shut-down inspections	Inspection of Contractor works including status of environmental	Prior to extended site shut down	All Contractors

Action	Scope	Timing	Responsibility
	controls prior to shut-down of site for an extended period (i.e. more than 2 days)		
General environmental inspection	Environmental management controls and records for all works.	Frequency determined based on risk of the activity (minimum monthly)	WSA AEO All Contractors
Contract Specific General environmental inspection	Environmental management controls and records for all works.	As per CEMPs (at least weekly)	WSA All Contractors
General environmental inspection	Environmental management controls and records for Contractor works.	As per CEMPs (at least weekly)	All Contractors
Environmental audit	Audit of environmental systems and on-site performance for all works.	6 monthly (unscheduled audits can be undertaken as needed)	WSA
Environmental Review Group Site Inspection	Environmental review group (ERG) established by WSA to discuss and present environmental performance to the Infrastructure Department and the Airport Environmental Officer. As part of this ERG site inspections may be undertaken.	Monthly and at any other time requested by the Infrastructure Department or WSA	WSA
Compliance Tracking	Document compliance with the requirements of the Airport Plan and project's planning approvals.	6 monthly	WSA
Compliance Audit	Independent audit of compliance with the conditions in the Airport Plan	As per Airport Plan Condition 48 (within six months following 12 months of the granting of the Airport Lease)	WSA
Environmental audit	Audit of environmental systems and on-site performance for all works.	As per Contractor environmental management system (at least quarterly)	All Contractors
Noise and vibration monitoring	As per Noise and Vibration CEMP		WSA All Contractors
Traffic and access monitoring	As per Traffic and Access CEMP		WSA All Contractors
Aboriginal Heritage monitoring	As per Aboriginal Heritage CEMP		WSA All Contractors
European and other Heritage monitoring	As per European and other Heritage CEMP		WSA All Contractors
Biodiversity monitoring	As per Biodiversity CEMP		WSA All Contractors
Air quality monitoring	As per Air Quality CEMP		WSA All Contractors
Soil and water monitoring	As per Soil and Water CEMP		WSA All Contractors

Action	Scope	Timing	Responsibility
Waste and resources monitoring	As per Waste and Resources CEMP		WSA All Contractors
Visual and landscape monitoring	As per Visual and Landscape CEMP		WSA All Contractors

8.1 Non-Conformance, Corrective and Preventative Actions

A non-conformance is an action or omission that does not conform with the requirements of this SEMF and supporting environmental documentation, or any legal or other requirement. Any member of the project team can identify a non-conformance and report it to the WSA Environment Manager. A non-conformance can also be identified by an engaged third party, e.g. External Auditor.

An opportunity for improvement may be identified through the review and monitoring processes that will be implemented during construction. Review, monitoring or auditing may identify a variety of improvements that must, or should, be made to ensure continual improvement. For example, an internal audit of the incident register may identify an opportunity for improvement in areas such as documentation or resourcing (number and experience of environmental or other personnel). Any member of the project team or engaged third party can identify an opportunity for improvement.

Each Contractor must implement a system for identifying and managing non-conformity, corrective and preventative actions, aligning with WSA requirements where possible.

8.1.1 Identifying Non-Conformances

Non-conformances may be identified in one of the following ways:

- Environmental incident or event investigation;
- Through inspection, monitoring and / or reporting;
- Audit and / or review; and
- Project team communication / feedback.

8.1.2 Reporting Non-Conformances

The WSA Environment Manager (or nominated delegate) will investigate and report non-conformances. Timeframes will be set to ensure any damage incurred is rectified and any chance of recurrence is eliminated as soon as practicable. The following details must be included:

- Details of the person reporting the non-conformance;
- Description of the non-conformance including time, date and location;
- Summary of the non-conformance including personnel involved, cause and environmental impact;
- Summary of actions taken to remediate the situation and mitigate further environmental impact;
- Further action required, a timeframe for completion and responsibility to correct or prevent future non-conformances; and
- Details of all non-conformances to be discussed at WSA/Contractor co-ordination meetings and reported in the monthly progress report.

8.1.3 Recording Non-Conformances

Following investigation and reporting, a summary of the non-conformance must be recorded in a Non-Conformance Register to be maintained by the WSA. Improvement opportunities will also be recorded in the

Non-Conformance Register, for example to capture any system improvements recommended as the result of an incident investigation.

8.1.4 Review of the Non-Conformance Register

The Non-Conformance Register will be reviewed regularly to ensure actions are closed out by the nominated close-out date. The register will also be reviewed as part of the quarterly Management Review (refer Section 8.3.5).

8.2 Auditing

The following sections outline the WSA environmental auditing provisions. Each Contractor must include its own auditing program within their Contractor EMS.

8.2.1 Internal Audits

Internal audits will be undertaken generally on a six-monthly basis throughout the Stage 1 Airport Development, depending on stage of project and package phase and associated level of risk. The purpose of auditing is to verify compliance with:

- This SEMF and associated CEMPs and Contractor environmental documentation;
- Approval requirements; and
- Any relevant legal and other requirements (e.g. licenses, permits, regulations).

8.2.2 Independent Audits

In accordance with Airport Plan Condition 48, an independent Audit of compliance with the conditions set out in the Section 3.11.2 was conducted by WSA covering the 12-month period commencing with the grant of the Airport Lease (17 May 2018). As required by Condition 48(3) the Independent Auditor was approved by the Infrastructure Minister or a SES Officer in the Infrastructure Department (the Approver) prior to the commencement of each audit. Audit criteria was agreed with the Approver and the audit report will address the criteria to the satisfaction of the Approver. The Audit Report was provided to the Approver and the Environment Department within six months of the end of the period in respect of which the audit was conducted.

8.2.3 External Audits

External audits will be undertaken generally on a six-monthly basis throughout the Stage 1 Airport Development. These audits may be enacted by WSA at any time in accordance with ISO 19011:2018 – *Guidelines for Quality and / or Environmental Management Systems Auditing*.

8.3 Reporting

8.3.1 Contractor Monthly Environment Report

Each Contractor is to prepare a Monthly Environment Report to track progress on environmental performance. The monthly report will include relevant details including, but not be limited to:

- Environmental inspections;
- Environmental monitoring;
- Waste and material importation;
- Environmental incidents;

- Recordable rain events
- Environmental non-conformances;
- Environmental audits;
- Details of planned, current and completed Out of Hours Works;
- Complaints and enquiries;
- Lessons learnt / identified continual improvements; and
- Training.

This report will be provided to WSA. A template for monthly reporting is located in Appendix P. Reporting requirements specific to certain environmental aspects are included in the CEMPs.

8.3.2 Recordable Event Report

The purpose of the Recordable Event Report is to capture and record details around events where the release of water from a work package/Project erosion and sediment (ERSED) controls occurs due to the design criteria being exceeded, including events where water is discharged from one Main Works Contractor (MWC) package to another. The report captures detail on:

- Controls in place were as per design/project requirements (i.e. Blue Book Compliant);
- Release of water from designed controls did not occur until design criteria was exceeded; and
- Steps implemented during / post event.

Recordable Event Reports will be submitted to WSA for review within three business days of the event finishing (defined as five days with no rain greater than 0.2 mm as recorded by the Bureau of Meteorology AWS). Once approved, WSA will submit the report to the Airport Environment Officer (AEO) as per AEPR requirements. The report will also be uploaded to the Project Document Control Register.

For events with a duration greater than seven days, weekly status updates will be submitted by Contractors using the Recordable Event Status Form in Appendix M. This form captures details around the status of controls and actions implemented during the event. The form/s will be provided to the AEO as the rain event progresses and will be attached to the overall Recordable Event Report. Completion of this process is to demonstrate all reasonable and practicable measures have been implemented in accordance with r4.01 of the AEPR.

Where the release of water from controls occurred prior to the design event being released (i.e. not sized or constructed properly, then this would be managed as an environmental incident (refer to Section 6 of this SEMF).

The Recordable Event Report Templates can be found in Appendix M.

8.3.3 Compliance Tracking

Review and update of the Compliance Tracking Program will be undertaken on a six-monthly basis throughout the Stage 1 Airport Development in accordance with the Environment and Sustainability Compliance Tracking Matrix Procedure (refer Appendix U). The Compliance Tracking Program tracks the status of compliance with relevant Conditions of Approval in the Airport Plan. This Program will be maintained by the WSA Environment Manager (or nominated delegate) and details of compliance provided in the Annual Report as detailed in Section 8.3.4.

An example Compliance Tracking Program is included in Appendix O

8.3.4 Environmental Compliance Reporting

Annual Report

The WSA Environment Manager (or nominated delegate) will prepare an Annual Report addressing compliance with the conditions set out in the Airport Plan Section 3.11.2 and the AEPR requirements set out in 6.03. The Annual Report will include the evidence of CEMP implementation, including the results of environmental monitoring conducted during the reporting period. A summary of incidents, including corrective and preventative actions implemented will also be included. The Annual Report will cover the following periods:

- The 12-month period commencing with the commencement of Main Construction Works;
- Each subsequent 12-month period until the end of the Construction Period; and
- Any period not included above that falls between the commencement of Main Construction Works and the end of the Construction period.

WSA may request the Infrastructure Department Secretary to determine an alternative reporting period for AEPR 6.03 if required. WSA will publish the Annual Report on its website within three months of the end of the reporting period. Each report will remain on the website for at least 12 months.

EPBC Part 13 Permit

The WSA Environment Manager (or nominated delegate) will prepare a report addressing compliance with the conditions set out in the *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act) Part 13 Permit (E2017-0138).

8.3.5 Management Review

Quarterly Environmental Review

An Environmental Management Review will be held quarterly for the purpose of:

- Identifying of areas of opportunity for improved environmental performance;
- Analysing the causes of non-conformities and deficiencies, including those identified in environment inspections and audits;
- Verifying the effectiveness of corrective and preventative actions; and
- Highlighting any changes in procedures resulting from process improvement.

This review will be prepared by the WSA Environment Manager (or nominated delegate) in consultation with the Contractor representative.

Executive Environmental Review

The WSA Executive Team will review the following on an annual basis and implement improvement action accordingly:

- Effectiveness of environmental management documentation implementation;
- Management effectiveness;
- Potential improvements to the environmental management documentation;
- Adequacy of resources;
- Findings of audits;
- Environmental objectives and targets;
- Environmental performance;
- Compliance with legal and other requirements;
- Critical non-conformance or repeated non-conformances;

- Organisation changes; and
- Effectiveness of training and inductions.

9 Documentation

9.1 Environmental Records

As per Airport Plan Condition 46, environmental records that demonstrate compliance with the conditions must be maintained. The WSA Environment Manager is responsible for the keeping of these records, which include:

- Monitoring, inspection and compliance reports and records;
- A register of compliance with Airport Plan Conditions and Approved Plans;
- Reports on environmental incidents, environmental non-conformances, complaints and close out actions;
- Copies of environmental control plan register, site induction register, environmental training register, incident register and non-conformance register;
- Monthly environmental reporting;
- Induction and training records; and
- Correspondence with government agencies and other stakeholders.

All environmental management documents are subject to ongoing review and continual improvement. This includes changes to legislative or licensing requirements. The above records will be made available to the Infrastructure Department on request. Environmental records and Approved Plans will be stored electronically on the WSA document storage system (e.g. Sharepoint, Aconex).

Each Contractor is expected to maintain these same records relevant to their works as a minimum and make them available to WSA or the Infrastructure Department for review / audit on request.

9.2 Continual Improvement

Continual improvement of this plan and the CEMPs will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continual improvement process has been designed to:

- Identify areas of opportunity for improvement of environmental management and performance;
- Determine the cause or causes of non-conformances and deficiencies;
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies;
- Verify the effectiveness of the corrective and preventative actions;
- Document any changes in procedures resulting from process improvement; and
- Make comparisons with objectives and targets.

9.3 Change Management

Further refinements to the Stage 1 Airport Development may result from detailed design refinement or changes identified during the construction phase of the works. Any design changes or changes in scope of works will be communicated to the WSA Environmental Manager. WSA would be responsible for assessing any potential inconsistencies with the Airport Plan and formally seeking approval from the Infrastructure Minister to vary the Airport Plan as required, prior to commencement of the scope of works in question.

9.4 SEMF and CEMP Revision

A document review process in accordance with the project's Quality Plan ensures that environmental documentation, including the CEMPs, are updated as appropriate to remain consistent with this SEMF. This includes the management reviews described in Section 8.3.5.

Should the document review process identify any issues or items that are either redundant or in need of updating, it is the responsibility of the WSA Environment Manager to prepare the revised documents.

The revised document will then be issued to the WSA Chief Executive Officer, or delegate, for endorsement of the changes. All changes to Approved Plans will require approval from the Infrastructure Minister or an SES Officer in the Infrastructure Department (refer to Section 3.9).

Appendix A

Preparatory Activities Approval Form

Refer to Preparatory Activities Form – WSA00-WSA-00400-EN-FRM-000002

Appendix B

Dewatering Permit Form

Refer to the Dewatering Permit Form - WSA00-WSA-00400-EN-FRM-000003



Appendix C Land Disturbance Permit Form

Refer to the Land Disturbance Permit Form - WSA00-WSA-00400-EN-FRM-000004

Appendix D Out of Hours Work Permit Form

Refer to the Out of Hours Works Permit Form - WSA00-WSA-00400-EN-FRM-000005

Appendix E Permit to enter protected area/no go area Form

Refer to the Permit to Enter Protected or “No-Go Area” Form - WSA00-WSA-00400-EN-FRM-000006

Appendix F Minor Environmental Assessment Procedure

Refer to the Minor Environmental Assessment Procedure - WSA00-WSA-00400-EN-PRO-000001

Refer to the Minor Environmental Assessment Form - WSA00-WSA-00400-EN-TMP-000001

Environmental Aspects, Impacts and Risk Procedure

Refer to the Environmental Aspects, Impacts and Risk Procedure - WSA00-WSA-00400-EN-PRO-000006

Appendix H

Environment Policy

Refer to the Environmental Policy in the WSA Website - <https://westernsydney.com.au>

Appendix I

Unexpected Find Protocols Procedure

Refer to the Unexpected Finds Protocols Procedure - WSA00-WSA-00000-EN-PRO-000001

Appendix J

Environmental Incident Classification and Reporting Procedure

Refer to the Environmental Incident Classification and Reporting Procedure - WSA00-WSA-00400-EN-PRO-000002

Refer to the Environmental Incident Report Template – WSA00-WSA-00400-EN-TMP-000004

Refer to the Environmental Near-miss Report Template - WSA00-WSA-00400-EN-TMP-000001

Appendix K

Environmental Inspection Checklist

Refer to the Environmental Inspection Checklist - WSA00-WSA-00400-EN-CKL-000001

Environmental Legal and other Requirements Register

Name	Activity / aspect	Requirement	Applicability
Commonwealth legal requirements			
<i>Airports Act, 1996</i>	Stage 1 Airport Development	<p>The Airport Plan provides the authorisation for the Stage 1 Airport Development.</p> <p>The Airports Act and AEPR set out the framework for the regulation and management of activities at airports that could have potential to cause environmental harm. This includes offences related to environmental harm, environmental management standards, monitoring and incident response requirements.</p>	<p>The Airport Plan prepared under the Airports Act covers a number of environmental matters and, in particular, details specific measures to be carried out for the purposes of preventing, controlling or reducing the environmental impact associated with the airport.</p> <p>The AEPR details the requirements for activities that may generate pollution, duties to avoid pollution and preserve habitat and heritage and the requirement for improving environmental management practices.</p> <p>Criminal offences are applicable where the legislation is not complied with.</p>
<i>Airports Act, 1996 s99</i>	Stage 1 Airport Development	<p>Airport Lessee Company must not carry out a building activity unless it is in accordance with an approval granted under the regulations or s99(1)(e):</p> <ul style="list-style-type: none"> • Exempt by regulations; and • Consistent with Part 2 of Airport Plan; and • Consistent with designated SWA instrument if an element of a major airport development; and • Consistent with Part 3 of the Airport Plan. <p>Airports Building Control Regulation, cl 2.24(1)(f): the following activities are exempt for s 99(1) and (3) of the Airports Act:</p> <ul style="list-style-type: none"> • Minor works, being a works that the airport building controller determines, in writing, should be exempt from the subdivision because: <ul style="list-style-type: none"> i. Interference with the airport site is minor; and ii. No danger arises of injury to a person using the airport. 	<p>Generally all works require a building approval issued by the ABC.</p> <p>Some minor works that are not inconsistent with the approved CEMPs and Construction Plan may be exempt.</p>

Name	Activity / aspect	Requirement	Applicability
<i>The Airports (Environment Protection) Regulations, 1997 (AEPR)</i>	All activities on the Airport Site.	The Airports Act and the AEPR set out the framework for the regulation and management of activities at airports that have potential to cause environmental harm once the airport lease has been granted. Part 6 of the Airports Act specifies offences relating to environmental harm, environmental management standards, monitoring and incident response requirements.	Management process for minimising environmental impacts, monitoring and incident response processes.
<i>Environment Protection and Biodiversity Conservation Act, 1999</i>	Stage 1 Airport Development	National environment law that provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places, defined in the Act as matters of national environmental significance. The EPBC Act also regulates actions that have a significant impact on the environment where the actions affect, or are taken on, Commonwealth land, or are carried out by a Commonwealth Agency.	Relevant requirements identified within the EIS are to be implemented.
<i>Environment Protection and Biodiversity Conservation Act, 1999 Part 13 Permit</i> <i>Issued under sections 201, 216 and 258 of the EPBC Act</i>	Prior to commencement of construction	The Part 13 Permit specifies the maximum quantity of threatened species that can be cleared, injured, taken, killed, etc, and contains strict limits on clearing and impacts on species that will require stringent monitoring and reporting to ensure compliance. Amendments to the EPBC Act list of threatened species and ecological communities occur on a regular basis to reflect their status if it has changed.	The Part 13 Permit has been issued to WSA to undertake the permitted activities. Obligation on the WSA Contractor to monitor works for compliance with Part 13 Permit and report compliance to WSA. Limits and thresholds may require variation as the works progress across Stage 1. <i>Current permit valid to 31 December 2027</i>
<i>Recycling and Waste Reduction Act 2020</i>	All activities on the airport site	Ensures only waste glass, plastic, tyres and paper that have been processed to acceptable level can be exported. It is aimed at preventing these materials from being dumped overseas, reducing harm to the environment and human health.	Management of waste materials going offsite to a compliant facility
NSW Legislation			
<i>Biodiversity Conservation Act 2016</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that	The purpose of this Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development	To be determined on a case -by-case basis depending on scope of work

Name	Activity / aspect	Requirement	Applicability
	are not 'ancillary developments'.		
<i>Biosecurity Act 2015</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The Noxious Weeds Act provides for the identification, classification and control of noxious weeds.	To be determined on a case -by-case basis depending on scope of work
<i>Contaminated Land Management Act, 1997</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The main objective of the Contaminated Land Management Act is to establish a process for notifying, investigating and remediating land which is, or may be, contaminated to a prescribed extent.	To be determined on a case -by-case basis depending on scope of work
<i>Environmental Planning and Assessment Act, (EPA Act) 1979</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The objectives of the EP&A Act include the encouragement of proper management and conservation of natural and artificial resources and the promotion of the orderly and economic use and development of land in NSW. The EP&A Act also provides for the making of environmental planning instruments.	To be determined on a case -by-case basis depending on scope of work
<i>Fisheries Management Act, 1994</i> <i>Fisheries Management Amendment Act 2009</i> <i>Fisheries Management Amendment Act 2015</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The Fisheries Management Act aims to conserve, develop and share the fishery resources of NSW for the benefit of present and future generations, including conserving fish stocks and fish habitat and promoting ecologically sustainable development.	To be determined on a case -by-case basis depending on scope of work
<i>Heritage Act, 1997</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The Heritage Act makes provisions for the conservation of NSW's 'European & other' environmental heritage.	To be determined on a case -by-case basis depending on scope of work
<i>Protection of the Environment Operations Act, 1997 (POEO Act)</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that	The objectives of the Protection of the Environment Operations Act are to protect, restore and enhance the quality of the	To be determined on a case -by-case basis depending on scope of work

Name	Activity / aspect	Requirement	Applicability
<i>Environment Operations Amendment (Asbestos Waste) Act 2018 No 80</i>	are not 'ancillary developments'.	environment, in recognition of the need to maintain ecological sustainable development.	
<i>Protection of the Environment (Waste) Regulation, 2014</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The main provisions of this regulation relate to the payment of a waste levy by licensed waste receivers, the requirements to track the transportation and disposal of certain types of waste, and specific requirements to track the transportation and management of asbestos waste.	To be determined on a case -by-case basis depending on scope of work
<i>National Parks and Wildlife Act, 1997</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The National Parks and Wildlife Act provides for the protection of Aboriginal objects (sites, objectives and cultural material) and Aboriginal places	To be determined on a case -by-case basis depending on scope of work
<i>Roads Act, 1993</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The Roads Act governs the opening, operation and management and closure of public roads in NSW.	To be determined on a case -by-case basis depending on scope of work
<i>State Environmental Planning Policy 19 – Urban Bushland (SEPP 19)</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The purpose of SEPP 19 is to protect and preserve bushland within urban areas due to its inherent aesthetic, community and natural heritage values.	To be determined on a case -by-case basis depending on scope of work
<i>State Environmental Planning Policy 55 – Remediation of Land (SEPP 55)</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	SEPP 55 provides for a state-wide planning approach to the remediation of contaminated land and aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment.	To be determined on a case -by-case basis depending on scope of work
<i>Waste Avoidance and Recovery Act, 2001</i>	Applicability will be determined on a case by case basis, e.g.	The Waste Avoidance and Recovery Act promotes waste avoidance and resource recovery.	To be determined on a case -by-case basis depending on scope of work

Name	Activity / aspect	Requirement	Applicability
	for offsite works that are not 'ancillary developments'.		
<i>Water Management Act, 2000</i>	Applicability will be determined on a case by case basis, e.g. for offsite works that are not 'ancillary developments'.	The Water Management Act is intended to ensure that NSW water resources are conserved and properly managed for sustainable use benefitting both present and future generations.	To be determined on a case -by-case basis depending on scope of work
Other requirements – refer to CEMPs for other requirements specific to the subject aspect.			

Appendix M

Recordable Event Templates

Refer to the Recordable Event Report Template - WSA00-WSA-00400-EN-FRM-000001 and Recordable Event Status Form (WSA00-WSA-00400-EN-FRM-000007)

Environmental Control Map Review Checklist

Refer to the Environmental Control Map Checklist - WSA00-WSA-00400-EN-CKL-000002

Appendix O Example Compliance Tracking Program

Environment Monthly Report Template

Refer to the Environment Monthly Report Template - WSA00-WSA-00400-EN-TMP-000003

Appendix Q

Emergency Spill Response Procedure

Refer to the Emergency Spill Response Procedure – WSA00-WSA-00400-EN-PRO-000003

Appendix R Waste Classification Procedure

Refer to the Waste Classification Procedure - WSA00-WSA-00400-EN-PRO-000004

Appendix S Out of Hours Works Procedure

Refer to the Out of Hours Works Procedure - WSA00-WSA-00400-EN-PRO-000005

Appendix T Material Import Approval Form

Refer to the Material Import Approval Form template - WSA00-WSA-00000-EN-FRM-000001

Appendix U

Environment and Sustainability Compliance Tracking Matrix Procedure

Refer to the Environment and Sustainability Compliance Tracking Procedure - WSA00-WSA-00400-EN-PRO-000007

Appendix V

Material Import Procedure

The Material import procedure is saved onto the WSA Sharepoint and is considered an agile document as the site remediation activities change as construction progresses.

Refer to the Material Import Procedure - WSA00-WSA-00400-EN-PRO-000008