

2 Environmental Management

2.1 Introduction

CLOSTER EARTHMOVING Shepparton shall ensure that the environmental aspects are identified for each project impacts analyzed and appropriate action implemented to control the environmental risks.

The General Manager is responsible for the review and verification of activities on projects.

The Site Supervisors are responsible for implementing the provisions of this procedure as they relate to the projects we work on.

2.2 Identify the Environmental Issues

An environmental issue is any element of our business' activities that can interact with the environment. For every new project, the Site Supervisor (SS) and / or the General Manager (GM) have the responsibility to review the contract requirements, the site and other pertinent information to determine whether there are any environmental issues that can be controlled or are influenced by our operations. These may include issues such as:

- land e.g.. Soil erosion (water or air bom), soil pollution
- water e.g.. Water pollution
- air e.g.. Noise pollution
- Native flora & fauna
- Archaeological
- Waste and energy management

This list may be prepared over the project duration and can be added to as matters are identified. e.g., changing conditions - weather, legislation may give rise to new aspects being identified.

There may be positive and negative issues - all are recorded.

NOTE: Remember that the subcontract environmental requirements are our environmental requirements. It is our responsibility to ensure that Subcontractors follow the fundamental guidelines in this procedure and include appropriate measures in their environmental management plans. We should Monitor their performance as below.

2.3 Analyze the Environmental Impacts

The SS and GM are to review the above issues to determine which may have significant impact on the environment. These are prioritized in terms of probability of the event occurring and the severity of the impact. The environmental impacts are analyzed in order of priority. Minor impacts need not be analyzed if deemed insignificant. They should, however, remain on the list in the SSP in case their priority changes.

In analyzing the environmental impacts and their significance, consideration is given to the following as necessary:

- Legislative requirements (government or authority)
- Regulations (national, state and local)
- Technological options available
- Financial aspects (including contractual requirements)

- The capability and resources of our business
- Other interested parties, reports and the like that may be applicable

- Previous project works with similar environmental aspects and impacts

Consideration should also be given to obtaining advice from expert consultants or having tests performed if the situation requires.

From the analysis of the environmental impacts the SS and GM should determine those aspects that require action, the scope of action and the timing for the action. The priority of these is based on the significance of the environmental impact.

2A Determine the Risk Level and the Control

The SS and GM are responsible for developing the Job Specific Analysis (JSA). This may be delegated to specialist personnel if required.

The first consideration is to review existing company JSA's to see what can be re-used or amended to suit

For new JSA's the following are considered in documenting the JSA:

- Objectives of the EAP
- Responsibilities for all activities
- Programs for the activities (these may be included in the overall construction program)
- Targets to be met and how these are measured
- Describe the process for implementation including the stages, materials, and plant and equipment Requirements
- Monitoring recording, reporting and distribution requirements
- Maintenance requirements
- Specific skills and training requirements
- Emergency response

The approval of the JSA lies with the General Manager. Depending on the environmental aspect and impact, other parties may also be involved in the approval process. This should have been identified during the analysis stage, but may be re-assessed when EAP approval is sought

When approved, the SS issues the JSA to all concerned parties.

Amendments to JSA should go through this process for approval and issue as necessary. **2.5**

Implement the Job Specific Analysis

JSA's are implemented in accordance with the plan. It is the SS's responsibility to ensure the plan is followed. The SS should delegate responsibility as per the plan and provide adequate resources in terms of time, cost and personnel to ensure effective and timely implementation.

2.6 Monitor the Job Specific Analysis

The SS is responsible for ensuring that the JSA as documented in the SSP is monitored as prescribed.

Monitoring should include as described in the JSA such activities as:

- Visual inspection
Measurement (with calibrated equipment) at the frequency required to ensure environmental issues are controlled

Records and reports shall be maintained,
distributed and filed.

2.7 Report on Breaches of the Job Specific Analysis

The personnel responsible for monitoring the implementation of the JSA report actual or potential breaches of the JSA using the Breach Notice.

Action is taken commensurate to the significance of the breach, especially for accidents and emergencies.

The Breach Notice includes the details of the breach as and when available.

Client, personnel subcontractors, authorities, public and others are advised and informed as necessary.

Action is determined to mitigate the impact of the breach, and this action taken as and when required. Statutory reporting of the breach is undertaken if required.

AN breaches are reviewed to assess the probability of recurrence. Action is taken in accordance with the Continuous Improvement procedure to amend procedures and JSA's.

Breach notices and registers are maintained with
current information.

2.8 Emergency Preparedness

For each project Environmental Management Emergency requirements are determined from the JSA. The procedures are referenced in the SSP and if necessary accompanied by Work Instructions.

All relevant personnel are trained in the procedure accordingly.

2.9 Business Improvements (Corrective & Preventative Action)

During each project and as part of the Management Review, the Managing Director is responsible for identifying improvements for EMS practices and procedures.

2.10 Reference

- Job specific analysis - work activity risks
- OHS and environmental hazard inspection checklists
- Job specific analysis - Probability, Impacts , Risk levels
- Environmental impact analysis & action plan
- Job specific analysis
- SSP

- Risk monitoring record
- Job Specific Analysis
- Defects and suggestions Breach notice
- Environmental breach register
- Emergency procedures
- Training procedure
- Evidence of EMS practices improvements