



# ENVIRONMENTAL MANAGEMENT PLAN FEB 2020



DANGEROUS GOODS



CHAIN OF RESPONSIBILITY



WORKPLACE HEALTH & SAFETY

## Document Control

Version	Date	Revision Details	Author	Approver

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# ENVIRONMENTAL POLICY

## 1. COMPANY DETAILS

Officer name:	Kristie Porter
Date of issue:	26 <sup>th</sup> of February 2020
Date of review:	26 <sup>th</sup> of February 2020

## 2. INTRODUCTION

Caesarstone has developed the following policy to create a safe and healthy workplace(s). This policy outlines the rules, responsibilities and procedures for environmental protection.

## 3. SCOPE

This policy applies across the organisation of Caesarstone and across all workplaces/worksites under this organisations control, including contractors/sub-contractors and visitors to the workplace/worksite. Caesarstone will continually improve our environmental performance, prevent environmental harm associated with our activities, develop employee environmental awareness, report on environmental performance and minimise waste.

## 4. RULES

- Wherever practicable employees at Caesarstone will reduce the volume of waste generated and reuse and recycle. Whenever possible new products and supplies should be reusable and/or recyclable
- Where possible purchase responsibly
- Prevent any actions from work activities causing environmental damage by following preventative procedures In the event of an incident/accident follow the emergency procedures, making sure that the appropriate equipment is available for clean-up and that a quick response is applied to eliminate or reduce any damage; &
- Be aware of environmental issues and safeguards, including erosion and sediment control, weed invasion, sensitive/rare vegetation and fauna, air quality, noise, waste, heritage and archaeological sites.

## 5. RESPONSIBILITIES

Officers and Supervisors must:

- Implement and review this policy
- Consult with workers about this policy
- Provide resources, information, training and supervision for workers to allow them to adhere to the rules and have the knowledge and resources to follow the procedures and understand their roles and responsibilities
- Comply with statutory requirements, codes, standards and guidelines
- Implement and comply with site Environmental Management Plans (EMP)
- Make sure all equipment is serviced and not showing visible emissions
- Make sure noise and air pollution are monitored and kept to the appropriate levels
- Make sure all incidents are investigated and if required appropriate disciplinary action carried out; and
- Undertake site environmental inspections using the *Site Environmental Inspection Checklist* and enter applicable waste details using the *Waste Management Plan* when required.

Workers must:

- Comply with the rules of this policy and follow environmental procedures
- Not act in a manner that places the environment at risk
- Use, store and dispose of chemicals as per the Safety Data Sheet (SDS)
- Remove waste from the workplace / worksite and place in designated waste areas
- Reduce the damage to flora and fauna
- Report any incidents or complaints to the officer / supervisor
- Participate in consultation and training in relation to environmental management; and
- Advise officer or supervisor of any potential breaches of plans or statements, and sightings of rare plants or animals, fauna or archaeological or heritage items.

## 6. SIGN OFF

**Signed:**

**Date:**

## 2. ENVIRONMENTAL MANAGEMENT

### 2.1. Environmental Management Structure and Responsibility

The principle responsibilities of Caesarstone workers with respect to the environment are described below. The management structure is set out in the following diagram. A matrix of specific site responsibilities is set out in **Table 1** below.

#### Chief Executive

Responsibilities

- Promoting and maintaining good environmental management.
- Facilitate the effective implantation of the EMP.
- Provide support to the Site Manager and hold them accountable for their specific responsibilities

#### Site Manager

Responsibilities:

- Taking all practical measures to ensure the site is operating according to this EMP, and without risks to the environment.
- For taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions.

#### Site Supervisor

Responsibilities:

- Inducting all workers and subcontractors and directing site activities in accordance with this EMP
- Detecting any non-compliance or environmentally risky conditions.
  - If the Site Supervisor does not have the necessary authority to fix a problem, they are responsible for reporting the matter promptly and recommending remedial action

#### Workers

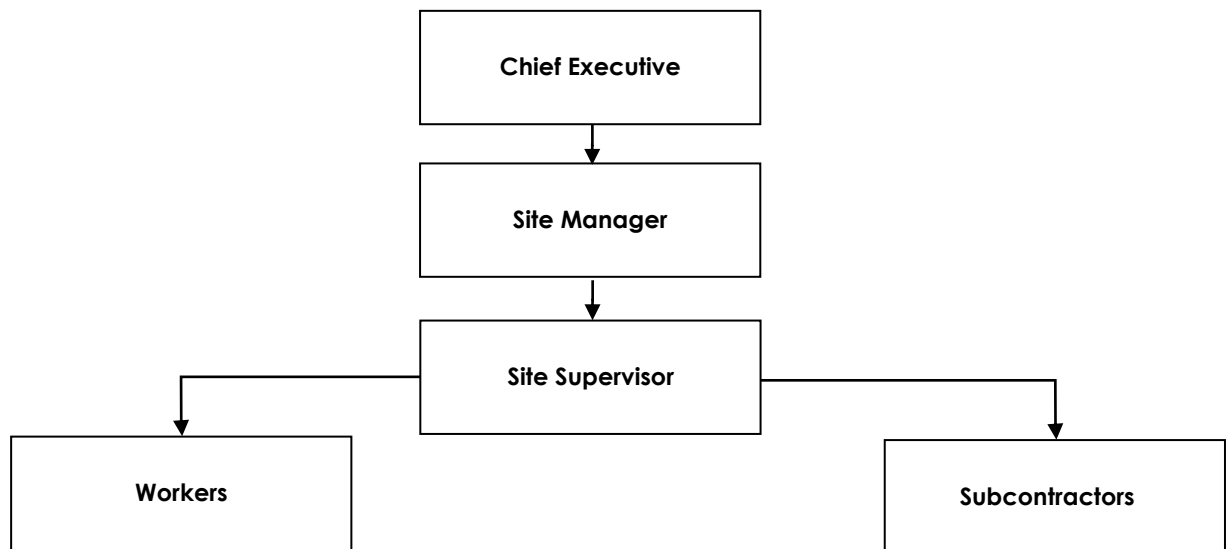
Responsibilities:

- All workers are required to attend site inductions and
- Follow the direction of this EMP.
- Advising the Site Manager of any potential environmental issues

#### Subcontractors

Responsibilities:

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



**Table 1 - Project Environmental Roles & Responsibilities Matrix**

1 = has responsibility for the overall implementation and / or management of the process/procedure on the project  
 2 = has responsibility for complying with the process/procedure

TASK	Chief Executive	Site Manager	Site Supervisor	Workers	Subcontractors
Inducting workers and subcontractors and directing site activities in accordance with the EMP.	2	2	1	2	2
Identifying, assessing and eliminating any non-compliance or environmentally risky conditions and documenting the risk controls implemented.	1	1	2	2	2
Promoting and maintaining good environmental management in accordance with the relevant environmental legislation, regulations and laws.	1	1	2	2	2
Implementing practical measures to ensure the site complies with the EMP	2	1	2	2	2
Maintaining, providing updates and supplying this EMP to relevant authorities and workers.	1	2	2	2	2
Monitoring and assessing subcontractors for the project to ensure environmental regulations are met and relate to the works undertaken	2	2	1	2	2
Maintaining stocks for environmental control	2	1	1	2	1
Provide and maintain a hazardous substance register for hazardous substances used and stored in the workplace;	1	1	1	2	2

**2.2. Approval and Licensing Requirements**

Licences, permits and approvals required for this site are summarised in the table below. Caesarstone will ensure that any licences, permits and approvals are obtained. A copy of all licences, permits and approvals are included in Attachment 1 of this EMP.

**Table 2 Summary of Licences, permits and approvals**

Regulatory Authority	Licence / Permit / Approval Type	Status	Summary of Key Conditions and Monitoring Required
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

### 2.3. Reporting

The Site Manager will ensure control of all project environmental documentation and reports. Adequate records will be maintained to demonstrate conformance to specified environmental requirements. The records to be maintained include, but not be limited to, the following:

- monitoring records.
- non-conformance, corrective action and preventive action
- complaints management.
- training and induction records.
- audit records.
- permits, licenses, and approvals.

These documents will be maintained within the company intranet.

### 2.4. Environmental Training

All Caesarstone workers who will be working onsite shall receive site-specific induction training. The induction training will include:

- familiarisation with the requirements of this EMP.
- familiarisation with Qube's OEMP for MLP Precinct East
- environmental emergency response training; and
- familiarisation with site environmental controls.
- community expectations and complaints management procedure

Caesarstone may combine the Work Health and Safety (WHS) and Environmental induction into one. A record of the site induction will be made on the *Site Environmental Induction Register* (see Attachment 2).

### 2.5. Emergency Contacts and Response

This EMP sets out Caesarstone management of environmental emergencies during the project. It includes:

- the names of key emergency response personnel and contact details (including all-hours telephone numbers)
- contact details for emergency services (e.g. ambulance, fire brigade, spill clean-up services)
- the location of on-site information on hazardous materials, including SDS (Safety Data Sheets) and spill containment material
- steps to follow to minimise damage and control the emergency; and
- instructions and contact details for notifying the Site Supervisor, EPA, local council, nearby residents or the community if necessary.

### 2.6. Emergency Contacts and Response

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- contact details for emergency services (e.g. ambulance, fire brigade, spill clean-up services)
- the location of on-site information on hazardous materials, including SDS (Safety Data Sheets) and spill containment material
- steps to follow to minimise damage and control the emergency; and
- instructions and contact details for notifying the Site Supervisor, EPA, local council, nearby residents or the community if necessary.



2.7. Key Emergency Response Personnel

The Site Manager will be the first point of contact when an incident or spill occurs. They can be contacted 24 hours a day. Contact details including emergency services are included in the table 3 below:

**Table 3 - Emergency Response Contact Details**

<b>Project Contact Details</b>	
<b>Emergency Services</b>	
Ambulance, Fire or Police	<b>000</b>
Poisons Information	13 11 26
<b>First Aider</b>	
Denise Spronson	02 9426 0524
<b>Utilities</b>	
Water	132 203
Electricity	132 090
Gas	131 388
Telephone	131 909
<b>EPA (24-hour pollution line)</b>	131 555
<b>Site Manager</b>	
Mick Sing	0417 632 126
<b>Officer / Site Supervisor</b>	
N/A	N/A
<b>Health and Safety Representative (HSR)</b>	
N/A	N/A
<b>Other Contacts</b>	
Kristie Porter (National HR Manager)	0407 803 045

2.8. Dangerous Goods/Hazardous Substances & Compliance with Conditions of Consent

Caesarstone **DO NOT** Store or Transport in any quantity:

- Dangerous Goods; or
- Hazardous Substances

2.8.1 Identification of Dangerous Goods

**Dangerous Goods:** are substances or articles that pose a risk to people, property or the environment, due to their chemical or physical properties. They are usually classified with reference to their immediate risk.

**Hazardous Substance:** are defined in terms of the chronic or acute harm caused to the health of people exposed to the substance.

The Classes of Dangerous Goods are listed in the **table 4** below:

Class	Description
1	Explosives
2.1	Flammable Gases
2.2	Non-flammable, Nontoxic gases
2.3	Toxic Gases
3	Flammable Liquids
4.1	Flammable Solids
4.2	Spontaneously Combustible
4.3	Dangerous when wet
5.1	Oxidizing Substances
5.2	Organise Peroxides
6.1	Toxic substances
6.2	Infectious Substances
7	Radioactive substances
8	Corrosives
9	Miscellaneous dangerous goods

The inclusion of section 2.8 is to comply with the condition of consent (CoC) B176 within our corporate Environmental Management Plan (EMP)

CoC B176 states:

*The quantities of Dangerous Goods present at any time within each premises or transported from and to the development must be kept below the screening threshold quantities listed in the Department's Hazardous and Offensive Development Guidelines Application Guidelines SEPP 33 (January 2011)*

CoC 177 states:

The Applicant (the operator/ occupant of each premises) must store and handle all chemicals, fuels and oils, including Dangerous Goods as defined in the *Australian Code for the Transport of Dangerous Goods by Road & Rail*, in accordance with:

- (a) the requirements of all relevant Australian Standards; and
- (b) the NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participant's Manual* if the chemicals are liquids.

In the event that circumstances change within our corporate business plan and dangerous goods are required to be transported or stored onsite Caesarstone will comply with the requirements of B176 and B177. Furthermore, Caesarstone will seek external expertise and advice on the approval and implementation of changes made that relate to the storage and/or transportation of dangerous goods. Qube Estate Management will be notified in advance and the *Environmental Management Plan* will be updated accordingly.

### 2.8.2 Dangerous Goods Storage Thresholds

Caesarstone recognise that where dangerous goods are stored in volumes greater than threshold quantities SafeWork NSW manifest quantity requirements apply. These requirements are listed in **Table 5** below:

Dangerous Goods	Packing Group	Manifest Threshold Quantities
Class 2.1	N/A	5000 L
Class 2.2	N/A	10,000 L
Class 2.2/5.1	N/A	10,000 L
Class 2.3	N/A	500L
Aerosols	N/A	10,000 L
Cryogenic Fluids	N/A	10,000 L
Class 3, 4.1, 4.2, 4.3, 5.1, 5.2,	I	500 kg or L
6.1, or 8	II	2,500 kg or L
	III	10,000 kg or L
	Mixed Packing Groups in a single Class, with each below the relevant threshold	10,000 kg or L
Class 9	II	10,000 kg or L
	III	10,000 kg or L
	Mixed Packing Groups in Class 9, with each below the relevant threshold	10,000 kg or L
C1 Combustible Liquids stored with other fire risk dangerous goods	Stored with other fire risk dangerous goods	10,000 kg or L
C1 Combustible Liquids stored separately	N/A	100,000 kg or L
Goods too dangerous to be transported that are not kept in a laboratory.	N/A	Any quantity

### 2.8.3. Identification of Quantities of Dangerous Goods

If Dangerous goods are identified onsite and in transport movements the following information will be collected, reviewed and recorded by Caesarstone:

- a rolling manifest of dangerous goods intending to be delivered to the warehouse, stored in the warehouse and being despatched from the warehouse and their respective quantities.
- dangerous goods classification for each material, including subsidiary class(es).
- the mode of storage used (that is, bulk or packages/containers) and the maximum quantity stored or held on the premises at any one time.
- the distance of the stored material from the site boundary for any of the materials in dangerous goods classes 1.1, 2.1 and 3; and
- an up-to-date register of Safety Data Sheets (SDS) for all materials in storage (see attachment 2)

Furthermore, the following information will be taken into account by Caesarstone

- LPG, as defined in AS1596 — LP Gas Storage and Handling, though classified as a flammable gas (2.1), is treated separately for screening purposes and should not be grouped with the other class 2.1 flammable gases.
- If combustible liquids of class C1 are present on site and are stored in a separate bund or within a storage area where there are no flammable materials stored, they are not considered to be potentially hazardous. If, however, they are stored with other flammable liquids, that is, class 3PGI, II or III, then they are to be treated as class 3PGIII, because under these circumstances they may contribute fuel to a fire.
- All industrial equipment that contains quantities of dangerous goods will be included in the quantification of dangerous goods present on the warehouse premises. Any materials of this nature will be considered to be part of the overall quantities of dangerous goods being stored on site.

- The weekly review of total dangerous goods quantities held on the warehouse premises will be conducted which provides visibility of held quantities relative to threshold values.
  - When compared to foreseeable receipt and despatch schedules for dangerous goods into and from the warehouse premises the potential for any exceedance of screening threshold values can be determined and will enable the re-routing or despatch of any material likely to create such an exceedance.
- Hazardous materials quantities will be grouped and totalled by class (ADG class), activity (goods transfer through warehouse or warehouse plant and equipment) and location (within warehouse racks, bunds, designated storage areas, internally or externally).
- Where several hazardous materials of the same class are kept on site in the same general location, the quantities will be totalled by class and activity (that is, total all quantities of each class stored in bulk then separately total the quantities of each class stored in packages/containers).
- If dangerous goods of a given class but varying packing groups are stored in the same general area, assume the total of that class is present as the most hazardous packing group (for example, if 3PGI and 3PGII are present, add these together and assume the equivalent total is of 3PGI).
- The distance of the material group to the nearest boundary is recorded. The distance is to be measured from those materials in the group located closest to the boundary.

## 2.9. Emergency Response Procedures:

### Fire Emergency

Steps to manage a fire emergency:

- Call '000' as soon as possible.
- If safe to do so leave the work area. If unsafe to leave, seek refuge in a safe area immediately.
- Go to the designated Emergency Assembly Area or to a clear/open area.
- Make sure all workers are present and accounted for, do not return to the work area to locate any missing workers; and
- Notify the Site Supervisor and wait for instructions.

### Gas Leak Emergency

Steps to manage a gas leakage emergency:

- Call the Site Supervisor immediately, if deemed necessary call the Fire Brigade on '000'
- Site Supervisor to immediately arrange to turn off the gas supply.
- Site Supervisor to turn off the site's electrical supply.
- If deemed necessary, notify all persons to evacuate the work area and assemble at the Emergency Assembly Area.
- Control the movement of people to the Emergency Assembly Area.
- Check all workers and others are in attendance; and
- Remain at the Emergency Assembly Area until notified that the area is safe to reoccupy.

### Leak or Spill Emergency

Steps to manage any Leak or Spill in a work site:

- Identify the source of the problem.
- Stop goods leaking.
- Contain spilt material, using spills kit or sand.
- Notify officer or Site Supervisor.
- Remove spilt material and place in sealed container for disposal (if possible); and
- Site Supervisor to record incident.

**OR**

- as suggested on Safety Data Sheet (SDS)

**NOTE:** In conjunction with the above please refer to the MPE 2 and Caesarstone ERP

### 3. IMPLEMENTATION

#### 3.1. Risks

The risk to the environment has been considered when devising this management plan. The outcomes of this process have provided our business with mitigation strategies to control the risks identified.

#### 3.2. Environmental Management Activities and Control Plan

The following environmental management activities, mitigation and control measures will be adopted to prevent or minimise environmental impacts.

##### 3.2.1. Air Quality

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Emissions of air pollutants from motor vehicles &amp; plant</b>		
Regular maintenance of machinery. Workers instructed not to leave machinery idling when not in use.	Site Supervisor	Ongoing
<b>Potential Impact: Dust generated from movement of plant</b>		
Disturbance of site will be monitored, and the site will be restored when required	Site Supervisor	Ongoing
Where significant dust is generated, from site operations the work area/stock and or equipment will be watered down or cleaned	Site Supervisor	Ongoing
Any newly excavated materials will be stocked piled and where possible re-used on site. Excess materials to be disposed of in accordance with the Protection of the Environment Operations Act 1997.	Site Manager	When Required

##### 3.2.2. Erosion & Sediment Control

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Site erosion and sediment laden water leaving the site</b>		
After heavy rain, all sediment and erosion controls will be checked and made good.	Site Supervisor	When Required
All stockpiles will be covered, and sediment fences installed on the low side to prevent materials washing away.	Site Manager	When Required

##### 3.2.3. Water Quality

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Contamination of water due to chemicals, fuels or wastes</b>		
Storage of fuels, chemicals and wastes will be clear of stormwater or drainage lines.	Site Supervisor	Ongoing
Safety Data Sheet (SDS) of hazardous substance will be referred to when spills occur.	Site Supervisor	Ongoing
The site will hold a spill kit to contain any site spills.	Site Supervisor	Ongoing
All hazardous substances on site will be recorded in the Hazardous Substances and Safety Data Sheet Registers.	Site Supervisor	Ongoing

3.2.4. Flora & Fauna

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Damage to trees and root systems</b>		
Excavation near trees to be kept will be avoided and stockpiles kept clear of any tree.	Site Supervisor	When Required
<b>Potential Impact: Disturbance to endangered species</b>		
Where an endangered species is identified, works will stop immediately, and the relevant authority notified.	Site Supervisor	Ongoing
Protective fencing will be installed around trees and areas where endangered species are found.	Site Supervisor	Ongoing
Any fauna species encountered on site will be relocated by a qualified wildlife carer from an organisation.	Site Manager	Ongoing
<b>Potential Impact: Spread of weeds</b>		
Weeds will be removed from the site and composted or disposed of to prevent spread.	Site Supervisor	Ongoing
Onsite lawns and garden areas will be maintained regularly, and refuse disposed of composted	Site Supervisor	Ongoing

3.2.5. Community Relations

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Public amenity</b>		
Notification letters will be sent out to nearby residents and owners prior to any new works commencing onsite, providing all necessary details for proposed works	Site Manager	If Required

3.2.6. Traffic

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Parking and access to site</b>		
A Traffic Management Plan for the site has been developed to manage all vehicle movements onsite	Site Manager	Ongoing
The Traffic Management Plan will be upheld onsite	Site Supervisor	Ongoing

3.2.7. Waste Management

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Unacceptable disposal of site waste</b>		
All material waste will be recorded in the Waste Register.	Site Supervisor	Ongoing
All waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997	Site Supervisor	Ongoing
Appropriate space will be provided for the temporary storage of garbage, recyclable and compostable waste to ensure separation of waste products.	Site Supervisor	Ongoing
On-going checks will be carried out to ensure correct separation and re-use of recyclable materials is being maintained.	Site Supervisor	Ongoing

3.2.8. Noise

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Unacceptable noise levels and vibrations</b>		
Work equipment will be maintained in good working order to comply with EPA guidelines. Where required, noise suppressors will be installed.	Site Supervisor	When Required
Hearing protection will be worn onsite.	All workers	Ongoing
Work will take place during nominated business hours only.	Site Manager	Ongoing

3.2.9. Hazardous Materials

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Spills and uses of hazardous materials</b>		
All hazardous and/or intractable wastes are to be disposed of in accordance with relevant Authority and EPA requirements.	Site Supervisor	Ongoing
All hazardous waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997 (POEO ACT 1997).	Site Manager	When Required
Safety Data Sheet (SDS) of hazardous substance will be referred to if spills occur.	Site Supervisor	When Required
All hazardous substances will be recorded in the Hazardous Substances Register and the SDS recorded in the Safety Data Sheets (SDS) Register.	Site Supervisor	Ongoing

3.2.10. Soil Contamination

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Spillage and leaking of hazardous material into the soil</b>		
Regular maintenance will be undertaken on all machinery and transport vehicles to ensure there are no fuel or oil spills or leaks.	Site Supervisor	Ongoing
Only trained workers will handle hazardous materials.	Site Supervisor	Ongoing
All materials will be labelled and stored in a lock-up with an impervious floor.	Site Supervisor	When Required
Safety Data Sheets (SDS) for all hazardous materials will be kept on site.	Site Supervisor	Ongoing
All site workers will be trained in spill management.	Site Supervisor	Ongoing

### 3.3. Environmental Control Plan

Further to Section 3.2, key features of environmental management for this site have been described in additional control plans.

These include the following:

- Site Planning
  - environmentally sensitive areas on and adjacent to the site
  - waterways and drains
  - erosion and sediment controls
  - vegetation requiring protection; &
  - Any monitoring locations
- Traffic Management Planning, which includes:
  - work areas, machinery or vehicle parking,
- Waste Management Planning
  - waste management areas, fuel and chemical stores
- Emergency Planning
  - Spill containment and response

### 3.4. Environmental Schedules

This EMP refers to a number of environmental schedules comprising forms, registers and checklists. They are listed below and included in Attachment 2.

1. Site Environmental Induction Register
2. Site Environmental Inspection Checklist
3. Environmental Complaint Form
4. Non-Conformance Report Form
5. Hazardous Substances Register
6. Safety Data Sheets (SDS) Register
7. Waste Register



## 4. MONITOR AND REVIEW

### 4.1. Environmental Monitoring

Caesarstone will monitor the environmental controls listed in Section 3.2 through regular site environmental inspections.

Site environmental inspections will be undertaken on at regular intervals or as required to monitor the requirements of this plan. Inspections will be recorded by the Site Supervisor on the Site Inspection Checklist (see Attachment 2).

### 4.2. Environmental Auditing

Planned and documented audits aimed at evaluating the environmental conformance our Moorebank site will be carried out by Caesarstone. Any deficiencies identified during the audits shall be documented and actioned in accordance with the Caesarstone corrective action process (see Section 4.5). Furthermore, the audit program will determine whether or not the EMP has been properly implemented and maintained onsite.

The audits to be carried out and their frequency are listed in table below:

Audit Type	Frequency	Record	Auditor
Environmental Management Plan	6 Monthly	Audit Report	Site Manager
Site Environmental Inspection	Monthly	Site Environmental Inspection Checklist	Site Supervisor

### 4.3. Communication

To minimise impacts on the public by our site, residents and adjacent property owners will be notified in advance writing before any new or additional works commence and at appropriate stages during any project undertaken in the future by Caesarstone. The letter will contain:

- details of the intended work,
- the duration of the activities,
- information regarding any access interruptions and details of whom to contact with questions regarding the work.
- The Project Manager will seek permission if there is any need to access private property.

Caesarstone will undertake external and on-site communication in case of environmental incidents and emergencies, including communication with subcontractors. External communication will include informing nearby residents of proposed work, incidents and emergencies and contacting regulatory agencies if required.

### 4.4. Complaints

Community groups, clients, interested parties, etc may advise of practices, activities and processes that are related to the environment by a variety of methods. These may include:

- a non-conformance report, fax/letter, telephone complaint, newspaper/magazine report and verbal protest.

On receipt of a complaint, the person receiving the complaint will notify the Chief Executive and the complaint will be recorded using the *Environmental Complaint Form* (see Attachment 2). The Site Manager will follow up the complaint and take corrective action as required.

### 4.5. Non-Conformance & Corrective Action

A non-conformance occurs when a procedure or environmental control is not followed or does not perform as required by this EMP. Caesarstone will monitor non-conformances to the EMP and initiate corrective and preventive action/s where required. All non-conformances will be recorded on a *Non-Conformance Report Form* (see Attachment 2).

Caesarstone will undertake corrective action/s in when incidents that have had an environmental impact. Procedures for identifying corrective action include:

- An EMP review
- An investigation into the causes of incidents and recording of the results; and
- Evaluating further environmental risks.
- In accordance with the requirements of CoC C11 – C17, non-conformances that are also considered to be an incident or warrant notification would be provided to Qube Estate Management.

#### 4.6. Environmental Management Plan Review

This EMP will be reviewed by the Site Manager as required to ensure its continuing suitability and to ensure it is conforming to the EMP's environmental objectives and legal requirements.

Reviews will be undertaken annually) or as a result of any of the following:

- when there is a change in the operations onsite which requires a change to environmental controls
- when there is a need to improve performance in an area of environmental impact
- at the completion of environmental audits as required; &
- as a result of changes in environmental legislation (applicable to our business activities)

Changes to the Environmental Plan

- Reasons for making changes to the EMP will be documented.
- A copy of the original EMP document will be kept within company records.
- The Chief Executive and Site Manager are authorised to change and re-issue the EMP
- The Site Supervisor is to be informed of any changes made
- The Site Supervisor is responsible for ensuring the staff are complying with the current EMP, and for informing staff of any changes.

##### 4.6.1 Environmental Management Plan Review Scope

The annual review scope may include (*but is not limited to*) the following:

- Compliance with legislation
- Are procedures are being followed (site inspection)
- Mitigative measures specified in this EMP are being implemented and remain adequate and appropriate
- Training and induction records are in order
- Environmental reports are being completed and any actions implemented and closed out
- Environmental incidents are being recorded, actioned and closed out
- Environmental objectives are being achieved

##### 4.6.2 Environmental Management Compliance Report

Caesarstone will prepare an '*Environmental Management Compliance Report*' which will detail how we have complied with the

- Conditions of Consent (CoC); &
- The Environmental Management Plan

The report will be supplied to Qube Estate Management on a six-monthly basis and form part of the overarching compliance report that Qube will submit to the DP&E in accordance with COC C21.

#### 4.7. Environmental Management Records

All documentation received, generated or stored pertaining to environmental matters will be managed in accordance with our document management procedure

Environmental records, which are collated and held onsite to demonstrate compliance with environmental obligations may include:

- Training and induction records
- Environmental incident reports
- Complaint records
- Non-conformance reports and corrective action plans
- Environmental monitoring data and reports
- Environmental site inspection checklists
- Plant and equipment maintenance, inspection and calibration records
- Internal environmental audits
- External environmental audits
- Monthly reports and data tracking e.g. waste, environmental performance and
- Record of pesticide/herbicide use.

ATTACHMENT 1: ENVIRONMENTAL LICENCES, PERMITS AND APPROVALS

- Insert EPL Information

## ATTACHMENT 2: ENVIRONMENTAL SCHEDULES

1. Site Environmental Induction Register
2. Site Environmental Inspection Checklist
3. Environmental Complaint Form
4. Non-Conformance Report Form
5. Hazardous Substances Register
6. Safety Data Sheets (SDS) Register
7. Waste Register



# SITE ENVIRONMENTAL INSPECTION CHECKLIST

## PROJECT DETAILS

**Site:** \_\_\_\_\_  
**Contact Name:** \_\_\_\_\_ **Telephone:** \_\_\_\_\_  
**Email** \_\_\_\_\_ **Date:** \_\_\_\_\_

## ENVIRONMENTAL ISSUES

Erosion and Sediment Control	Yes	No	N/A	Comments
Have materials been contained or placed in designated areas to be away from stormwater drains/runoff?				
Are designated washout areas in place away from storm water drains?				
Is relevant protection in place surrounding flora to stop any damage?				
Is the site maintained and cleared away daily of all soil, earth, mud, clay that may cause an environmental issue?				
Waste Management	Yes	No	N/A	Comments
Has a Waste Management Plan been created and implemented?				
Have stockpiles or designated waste areas been created?				
Is the waste being stored in such an area as not to pollute or contaminate stormwater drains?				
Have excess materials been recycled, reused or returned?				
Hazardous Materials	Yes	No	N/A	Comments
Are spill kits available and held on site?				
Are spills attended to and cleaned up immediately?				
Is there a designated storage area for hazardous materials where leaks can't flow to open ground or drains?				
Are all hazardous material containers sealed properly and no leaks evident?				
Are Safety Data Sheet (SDS) on site for all hazardous materials?				
Air Quality	Yes	No	N/A	Comments
Does all plant and equipment comply with the relevant codes and emission standards for air quality?				
Noise Management	Yes	No	N/A	Comments
Are procedures in place to minimise noise to workers, site and surrounding areas.				
Does all plant and equipment comply with the relevant codes, guidelines and standards for noise control?				

**Company Representative Name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

# ENVIRONMENTAL COMPLAINT FORM

**Project Name:** \_\_\_\_\_ **EC Number:** \_\_\_\_\_  
**Address:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**EC issued to:** \_\_\_\_\_ **EC issued by:** \_\_\_\_\_

## ENVIRONMENTAL COMPLAINT DETAILS

### Environmental Incident

- |                                    |  |
|------------------------------------|--|
| <input type="checkbox"/> Pollution | <input type="checkbox"/> Potential pollution |
| <input type="checkbox"/> Other:    |  |

### DETAILS OF COMPLAINT

<b>Name:</b>		<b>Address:</b>	
<b>Position:</b>		<b>Contact No</b>	

### NATURE OF COMPLAINT

- |                                      |  |
|--------------------------------------|--|
| <input type="checkbox"/> Dust        | <input type="checkbox"/> Vibration                     |
| <input type="checkbox"/> Noise       | <input type="checkbox"/> Soil contamination            |
| <input type="checkbox"/> Water       | <input type="checkbox"/> Plant/machinery               |
| <input type="checkbox"/> Pollution   | <input type="checkbox"/> Waste                         |
| <input type="checkbox"/> Flora/fauna | <input type="checkbox"/> Erosion and sediment controls |
| <input type="checkbox"/> Other:      |  |

### INCIDENT DETAILS

<b>Location of incident:</b>		<b>Time:</b>	
		<b>Date:</b>	

**Description:**

**Conditions of site when complaint occurred:**

Corrective or preventive action to be taken to fix the complaint	Responsible person	Date to be completed by

### SIGN OFF

**Corrective or preventive action is complete and dealt with by the responsible person noted above**

<b>Name:</b>		<b>Date:</b>	
<b>Signature:</b>			

**Site Manager agrees corrective or preventative is complete**

<b>Name:</b>		<b>Date:</b>	
<b>Signature:</b>			

# NON-CONFORMANCE REPORT FORM

**Project Name:** \_\_\_\_\_ **NCR Number:** \_\_\_\_\_  
**Address** \_\_\_\_\_ **Date:** \_\_\_\_\_  
**NCR issued to:** \_\_\_\_\_ **NCR issued by:** \_\_\_\_\_

## NON-CONFORMANCE DETAILS

### Area of Non-Conformance

- |  |  |
|--|--|
| <input type="checkbox"/> Site Establishment<br><input type="checkbox"/> Works outlined in contract<br><input type="checkbox"/> Supplier<br><input type="checkbox"/> Customer complaint | <input type="checkbox"/> Work Health and Safety<br><input type="checkbox"/> Environmental Management<br><input type="checkbox"/> Quality Management<br><input type="checkbox"/> Other: |
|--|--|

### Description of Non-Conformance


### Outline the evidence obtained for Non-Conformance


Corrective or preventive action to be taken to fix the Non-Conformance	Responsible person	Date to be completed by

### Sign Off

**Corrective or preventive action is complete and dealt with by the responsible person noted above**

<b>Name:</b>		<b>Date:</b>	
<b>Signature:</b>			

**Caesarstone agrees corrective or preventative is complete**

<b>Name:</b>		<b>Date:</b>	
<b>Signature:</b>			











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