EIS Volume 1 Chapter 20

Environmental Management Framework

JBS&G

project energy connect

Contents

List of Tables

20. Environmental Management Framework

This chapter describes the environmental management framework that will be applied during construction and operation for the Project. It describes ElectraNet's Health, Safety and Environment Management System (HSEMS) and Safety and Sustainability Standards and sets out the framework for the development and implementation for a range of environmental management plans, including those required by the EIS guidelines.

20.1. EIS Guidelines

The EIS Guidelines in relation to the environmental management framework are set out in Table 20-1.

Table 20-1: EIS Guidelines related to the environmental management framework

EIS Guidelines related to the environmental management framework	Assessment level
Construction, Operation and Maintenance Effects *Assessment requirement 15:* The construction and operation of the proposal would require a range of impacts to be minimised, mitigated and monitored through an environmental management plan framework	
15.13: Outline the proposed environmental management measures that would be adopted to deal with the identified construction, operational and maintenance effects. Include reference to any baseline studies, monitoring and training programmes, and reporting mechanisms (internally and to public authorities). Outline the effectiveness of mitigation measures for perceived and recognised impacts. Include consideration of previously demonstrated best practice or approaches which may have been used for similar works in similar habitats, which may be of benefit and / or have been endorsed for their proven low impact effects. Equally, innovative or new approaches should also be included.	Standard
Specialist Reports and Details **A Construction Environmental Management Plan (CEMP)** that describes how construction will be managed to mitigate negative environmental impacts to the environment, and public health and the amenity, and how those environmental management requirements will be implemented. Any CEMP should include consideration of a soil erosion and drainage management plan such as details of proposed stormwater management, including any opportunities for retention and reuse. **An Operations Environmental Management Plan (OEMP)** that describes how operations, in particular maintenance regimes, will be managed to mitigate negative impacts to the environment, and public health and the amenity, and how any ongoing environmental management requirements will be implemented. Any OEMP should include risk management plan which includes consideration of minimising maintenance works during fire danger season.	

In addition to the CEMP and the OEMP, the EIS Guidelines identify a number of other management plans which will be required for the Project to manage predicted environmental impacts. These are listed in Table 20-2 together with the chapter which contains further discussion on the plans.

Table 20-2: Project management plans addressed in other chapters

Management plan	Chapter
Native Vegetation Clearance Data Report	Chapter 12 Flora and Fauna
Cultural Heritage Management Plan	Chapter 18 Cultural Heritage
Waste Management and Minimisation Plan	Chapter 19 Waste Management
Fire Hazard Management Plan	Chapter 18 Hazards and Risk Management

The general requirement in EIS Guideline 15.13 to outline the proposed environmental management measures which will be adopted, is specifically addressed in the chapters which discuss environmental

aspects and is not detailed further in this chapter. These chapters set out the details of the predicted impacts of construction, operation and maintenance activities on that aspect and the environmental management measures which will be put in place to mitigate impacts. These management measures (which may include baseline studies, monitoring and training and reporting mechanisms where relevant) are also set out in the Draft Construction Environmental Management Plan and the Draft Operations Environmental Management Plan which are provided in Appendices P and Q and discussed further in Section 20.3.

Identification of management measures has taken into account the specific requirements for delivery of the Project, the nature of the habitats and land uses traversed by the transmission line and protection of the amenity of the local community. Discussion of the expected effectiveness of the identified management measures in addressing impacts and the consideration of proven or new approaches is provided in the context of the environmental aspect addressed in each chapter.

More generally Chapter 7 Project Description describes the techniques and technologies that are proposed for construction of the Project including how use of alternative transmission technologies, structure types and construction techniques (e.g. the use of helicopters) to minimise environmental impacts have been considered in the Project design.

20.2. ElectraNet Environmental Management System

An Environmental Management System (EMS) provides the framework by which environmental risks associated with an organisation's activities, products and services can be identified, managed and monitored. These systems focus on continuous improvement of environmental performance, prevention of environmental damage and resource management. An EMS can also assist by providing the means of demonstrating of ongoing environmental regulatory compliance.

The ElectraNet Health, Safety and Environmental Management System (HSEMS) is outlined below.

20.2.1. ElectraNet Health, Safety, Environment and Sustainability Management

Health, Safety, Environment and Sustainability Policy

All ElectraNet operations are undertaken in accordance with the overarching Health, Safety, Environmental and Sustainability Policy which provides the basis for ElectraNet's operating policies and procedures for this area. The stated policy commitments are:

- 'to keeping our people safe from harm every day, to provide a safe and healthy workplace for workers, contractors and visitors and to protect and respect the natural and cultural environment in the communities in which we operate'; and
- 'to conducting a balanced approach to its business activities incorporating environmental and social responsibility to ensure our activities are sustainable for the benefit of current and future generations'.

Environmental Management Policy

ElectraNet's the Environmental Management Policy outlines the company's commitment to developing and maintaining an EMS that delivers improved environmental performance in accordance with the *Environment Protection Act 1993* (SA) and other relevant legislation, regulations, standards and codes of practice. The policy addresses:

- developing and maintaining of an EMS

- assessing activities and assets regularly to identify environmental aspects and impacts, and developing objectives and targets to prevent pollution
- developing, documenting and maintaining robust standards and procedures
- establishing and maintaining key performance indicators and measuring effectiveness through regular environmental inspections, audits and management reviews
- providing all employees and contractors with appropriate induction and training
- proactively communicating and transparently reporting environmental performance and responding to stakeholder information requests
- incorporating climate change and sustainability principles into the EMS and reducing greenhouse gas emissions.

Health, Safety and Environment Management System (HSEMS)

Implementation of ElectraNet HSE policies and principles noted above is through the Health, Safety and Environment Management System (HSEMS) which is described in the HSE Management System Framework. This HSEMS framework document defines the structure for management of HSE across ElectraNet, and the elements and expectations by which the health and safety of workers, the public, and the environment in which they work and live, are protected during conduct of ElectraNet operations.

The HSEMS has been developed in alignment with international standard *ISO 45001:2018 Safety Management Systems* requirements and *14001:2015 Environmental Management System* requirements and is certified to *AS 4801: 2001 Occupational health and safety management systems - Requirements* and *ISO 14001:2004 Environmental management systems – Requirements*.

The framework sets out expectations and guidance in relation to roles and responsibilities, assessment of HSE opportunities and risks, communication and documentation, operational planning, emergency preparedness, performance evaluation and continuous improvement.

The HSEMS is subject to ongoing review using the plan-do-check-act approach for continuous improvement.

Safety and Sustainability Standards

The HSEMS framework identifies ElectraNet's Safety and Sustainability Standards (S&S Standards) for contractors undertaking construction works and providing asset maintenance services as part of a sustainable procurement approach. The S&S Standards are an integral part of the ElectraNet HSEMS and outline the minimum safety and sustainability requirements for ElectraNet contractors and subcontractors.

The S&S Standards detail the environmental management plans which are required to manage environmental risks and impacts associated with projects and which include:

- **Construction Environment Management Plans (CEMP).** Contractors are required to prepare, submit, implement and maintain a project specific CEMP in accordance with their environmental management system, ElectraNet requirements and regulatory obligations.
- **Asset Maintenance Environmental Management Plans (AMEMP).** Maintenance service providers are similarly required to prepare and submit an AMEMP to manage environmental aspects associated with asset maintenance.

It should be noted that the Operations Environmental Management Plan (OEMP) referred to in the EIS Guidelines and the AMEMP perform the same function, however for consistency with the EIS Guidelines and the purposes of this chapter, the plan addressing operations environmental management is referred to as the OEMP.

The S&S Standards set out the actions which must be undertaken by ElectraNet in the preparation of the CEMP and OEMP (e.g. provision of information on land access agreements, site contamination, significant flora and fauna) and the Contractor (e.g. undertaking site inspections, risk assessments). Other actions covering requirements for matters such as training and site induction, inspections and audit schedules, vegetation protection and rehabilitation and cultural heritage site management are also set out in the S&S Standards.

Legal and other requirements

ElectraNet must also comply with a range of legislation, policies and requirements as set out in the Chapter 5 Legislative and Planning Framework. The CEMP and OEMP will provide the framework for achieving compliance with regulatory requirements (including the general environmental duty), environment protection policies, standards, guidelines and codes of practice.

20.3. Environmental Management Framework for the Project

20.3.1. Preparation of CEMP and OEMP

Project specific plans for environmental management of construction, operations and maintenance are required by both the ElectraNet S&S Standards and EIS guidelines. These will be developed and implemented in line with ElectraNet's overarching approach to environmental and social sustainability, and in compliance with relevant legislation and other regulatory requirements.

A draft CEMP and OEMP have been developed to support the EIS submission. These draft EMPs will be updated by the relevant contractors following the approvals process and submitted to relevant government regulators for approval prior to commencement of Project construction or operation activities. The Draft CEMP is at Appendix P and Draft OEMP is at Appendix Q.

As a general guide it is expected that the structure of the CEMP and OEMP will include the following:

- an introductory overview of the key issues requiring management
- key legislation, policies, standards and other requirements that apply to the environmental aspect.
- relevant environmental values that require protection
- identification and analysis of potential environmental impacts, including environmental hazards and risks
- performance goals the EMP is seeking to achieve in order to avoid or mitigate impacts
- an overview of the management measures that will be utilised to meet the objectives and their timing. Where required, specific plans will be developed for aspects requiring further detail
- specification of the required level of performance to meet environmental/legislative or Project-specific standards
- procedures to monitor, measure and record performance (e.g. inspections and auditing)

- reporting requirements to regulators, the community and other stakeholders for the environmental aspect and the responsible parties.
- procedures to be undertaken if performance indicators are not met.

The CEMP for the Project will be based on the draft CEMP prepared for the EIS and will address management of environmental aspects identified and discussed in the EIS (refer Table 20-3). The CEMP will also include information as advised in the Construction Environment Management Plan Guideline (EPA 1095/19) (EPA SA 2018). The OEMP will similarly be structured around the environmental aspects identified in the EIS for the Project and based on the draft OEMP prepared for the EIS.

Some specific issues will be addressed through more detailed sub-plans within the CEMP to provide appropriate guidance to contractors and other personnel on site. These could include a Rehabilitation Management Plan, Weed, Pest and Disease Management Plan, Sedimentation, Erosion and Drainage Management Plan and Traffic Management Plan

Other environmental management plans are specifically required to be prepared by the EIS Guidelines and will be additional to the CEMP and OEMP (refer Table 20-4).

All plans will require approval from ElectraNet and the appropriate regulators before construction, operations or maintenance activities commence.

Table 20-3: Management measures to be addressed in the CEMP and OEMP

Issue	CEMP	OEMP	Chapter
Sedimentation, soil erosion and drainage	✓		Chapter 10 Physical Environment
Spills, incidents and emergency response	✓		Chapter 10 Physical Environment Chapter 18 Hazards and Risk Management
Acid sulphate soils	✓		Chapter 10 Physical Environment
Soil or groundwater contamination	✓		Chapter 10 Physical Environment Chapter 19 Waste Management
Wastewater	✓		Chapter 10 Physical Environment
Vegetation management	✓	✓	Chapter 11 Flora and Fauna
Pest, diseases and weeds	✓	✓	Chapter 11 Flora and Fauna
Fire	✓	✓	Chapter 11 Flora and Fauna
Interactions with fauna	✓	✓	Chapter 11 Flora and Fauna
Cultural heritage	✓	✓	Chapter 12 Cultural Heritage
Dust and air emissions	✓		Chapter 14 Air Quality
Noise and vibration	✓		Chapter 15 Noise
Traffic	✓		Chapter 15 Noise Chapter 16 Traffic and Transport
Landholder notification and access arrangements	✓	✓	Chapter 9 Land use and Tenure
Addressing community concerns	✓		Chapter 15 Noise
Rehabilitation and reinstatement.	✓	✓	Chapter 9 Land use and Tenure Chapter 11 Flora and Fauna

Table 20-4: Environmental management plans required by the EIS

Plan	Appendix	Chapter
Cultural Heritage Management Plan	Appendix R	Chapter 12 Cultural Heritage
Fire hazard management plan	Appendix S	Chapter 18 Hazard and Risk Management
Waste management and minimisation plan (for construction and operation)	Appendix T	Chapter 19 Waste Management

20.3.2. Environmental monitoring

Monitoring of construction, operations and maintenance activities will be undertaken to determine whether environmental risks are being managed, minimised or where reasonably possible, eliminated. Monitoring requirements in the CEMP and OEMP will address aspects such as compliance with regulatory requirements, control of weeds and pests and vegetation regeneration.

20.3.3. Emergency response

ElectraNet has an emergency response system in place as part of the overarching HSEMS, with processes and plans for responding to potential or actual or emergency situations documented in an Emergency Response Procedure which is regularly reviewed and updated.

Specific emergency response plans for Project construction activities will also be developed. Emergency preparedness and response is discussed in further detail in Chapter 18 Hazards and Risk Management.

20.3.4. Stakeholder engagement and complaint management

Consultation and communication between ElectraNet and affected landholders will be ongoing during construction. Land access protocols will be established with each landholder where construction activities are planned and appropriate access arrangements will be agreed provided to all contractors and construction crews together with standard ElectraNet operating procedures.

All ElectraNet employees, contractors and visitors who interact with members of the local community are expected to adhere to ElectraNet policies requiring respect for the cultural environments of the communities in which ElectraNet operates.

A community feedback and complaints process will be set out in the CEMP and OEMP to ensure that all feedback and complaints are appropriately recorded and addressed.

20.3.5. Training and induction

All Project personnel involved in construction activities will be required to undergo training in environmental management and safety requirements as part of their induction on to the site and prior to commencement of construction or operational activities. Job-specific training relevant to roles will also be undertaken and records maintained of induction and attendees.

Specific training and induction requirements will be set out in the CEMP.

20.3.6. Reporting and compliance

The HSEMS provides for processes for recording, reporting and tracking corrective actions for incidents and hazards, allowing analysis of incidents to identify areas requiring improvement. Internal and external reporting procedures will be implemented to ensure that environmental issues and / or

incidents are appropriately responded to. A key component of the internal reporting will be Contractors' progress and incident reports to ElecraNet. External reporting (e.g. incidents, annual reports) will be carried out in accordance with regulatory requirements.

Contractors are responsible for reporting all Safety and Sustainability Events (including any notice received from a government agency) to the ElectraNet Project / Program Manager (or their representative) within one hour of the incident occurring, or if not reasonably practicable, as soon as possible. The relevant notification entry is made into the ElectraNet Incident Management System (IMS) within 24 hours.

The HSEMS also requires that an audit schedule is prepared that details the type and number of audits and inspections to be conducted and their timing. This is followed up with a procedure specific to Non-Conformance and Corrective Actions, which sets out the process, rules and responsibilities that apply to raising non-conformances or opportunities for improvement.

Chapter 18 Hazards and Risk Management provides further details on ElectraNet's risk and hazard management processes under the HSEMS.

20.3.7. Roles and responsibilities

All personnel involved in the Project, including ElectraNet employees, advisors, contractors and subcontractors are required to undertake work in accordance with the CEMP, OEMP and the HSEMS. Key roles and responsibilities for the implementation of the EMS during Project construction are presented in Table 20-5.

Table 20-5: HSEMS roles and responsibilities during Project construction

Role	Responsibilities
Safety and Sustainability Business Partners	• Lead the development of a positive and collaborative relationship with the Contractor's team • Provide strategy, general and technical health, safety and environmental advice to the ElectraNet teams • Provide the Contractor with or access to a copy of the ElectraNet S&S Standards, ElectraNet SMP and EMP review checklists upon works award • Liaise with all appropriate stakeholders on HPI incident investigations • Liaise and provide procedural advice to the Contractor's Health Safety and Environmental Manager(s) • Attend and participate in project or works leadership meetings as and if required • Complete contractor performance quarterly reporting, liaising with the Team Leader - Field.
ElectraNet Land Management Cultural Heritage Advisor	• Liaise with appropriate Traditional Owner stakeholders and organise surveys/monitoring activities as appropriate • Participate in ICAM investigations alongside the Contractor's representatives as required • Liaise with on-site ElectraNet cultural heritage representatives as appropriate • Escalate any issues not resolved on site to the ElectraNet Project / Programme Managers and the Land Manager.
ElectraNet Land Management Landowner Liaison Co-Ordinator	• Manage landowner relationships, property access notifications and special requirements including with the Department of Environment and Water • Maintain ElectraNet connect land access database for ElectraNet and Contractor information • Escalate any issues not resolved on site to the ElectraNet Project/Programme Managers and the Land Manager.
ElectraNet Team Leader Field	• Liaise with all appropriate stakeholders on HSE systems and HSE pre-qualification audits • Address and resolve with any escalated items as notified by the HSE Advisors with the ElectraNet Project/Programme Managers

Role	Responsibilities
	• Review and approve HS & E Advisor project and works reports • Hold to account the Contractor's adherence to the requirements of the ElectraNet Safety and Sustainability Standards • Manage all non HPI contractor incidents and near misses in conjunction with the ElectraNet teams
Health Safety and Environmental Advisors	• Review contractor health safety and environmental documentation in accordance with business procedures and provide written feedback to the contractor via the ElectraNet Project / Programme Manager • Attend all Safety in Design and Construction Risk related review meetings and workshops • Hold to account the Contractor's adherence to the requirements of the ElectraNet Safety and Sustainability Standards • Attend site work fronts, independently observe activities and conduct HSE systems audits and inspections throughout all phases of the works • Liaise with the Contractor's HS & E Advisors for ground level opportunities for improvement • Escalate any issues not resolved on site to the ElectraNet Project / Programme Managers and ElectraNet Team Leader - Field • Provide holistic commentary on the Contractor's health safety and environmental performance • Participate in and contribute to the Contractor's health safety and environmental initiatives • Participate in incident cause analysis method (ICAM) investigations alongside the Contractor's representatives as required • Provide formal reports to the ElectraNet Team Leader- Field for ElectraNet promulgation • Attend and participate in project and works team meetings as and if required.
Project / Programme / Design Managers	• Collaborate with and seek advice on health, safety and environmental aspects from the HSE discipline at all stages of the project or works • Hold accountable project and works team members to contribute in an ongoing manner to health safety and environmental performance on the project or works • Notify incidents and near misses to relevant stakeholders • Liaise with the ElectraNet Team Leader - Field to resolve any escalated site issues • Liaise with the ElectraNet Team Leader Field regarding any inspection, or HSE system audit findings and non-conformances