



HSE SYSTEM REQUIREMENT

SR Environmental Planning

PURPOSE

The purpose of this system requirement (SR) is to explain the planning activities necessary to deliver the environmental performance outcomes outlined in the Laing O'Rourke Environmental Policy and other compliance obligations.

PROJECT START UP AND MOBILISATION

From the Bid phase through to the planning and design phases of a project the Project Start Up and Mobilisation (PSUM) process and associated PSUM Toolbox is to be followed. This includes planning activities for environmental management. The bid leader is responsible for PSUM during the bid phase and after award responsibility is handed over to the Project Leader for the planning, design and delivery phases.

ENVIRONMENTAL RISK ASSESSMENT WORKSHOP

An environmental risk assessment must be developed and reviewed in accordance with SR Environmental Risk and Opportunity. This is to be developed as the output of an environmental risk assessment workshop. The workshop is to be undertaken prior to project commencement to identify all the environmental constraints associated with the project. The workshop is to identify the environmental risks associated with the constraints and activities on the project. This may be combined with a cross-functional project wide risk workshop but this must include relevant environmental risks and opportunities.

The environmental risk assessment workshop is to develop risk mitigation and management strategies to eliminate or reduce the risk exposure. The risk mitigation strategies are to be incorporated into the site-specific environmental management plan and into the associated construction methodologies or work packs. Project wide or significant environmental risks or opportunities shall also be incorporated into the project or site Risk and Opportunity register.

The environmental risk assessment workshop may be undertaken during the tender phase and updated upon project award.

The workshop is to be attended by the project leadership team, relevant functional team members and the bid team (if handover is considered necessary).

The Laing O'Rourke Environmental Aspects and Impacts Register shall be used to guide the content of the environmental risk assessment workshop. In addition, the site or project specific environmental assessment and compliance obligations shall be used to inform the environmental risk assessment workshop.

Specific mitigation measures identified to manage environmental risks must be incorporated into operational activities through the following working documents:

- Environmental Management Plan

- SWMS, JSEA's, HAZID, CRAW, Inspection and Test Plans / checksheets (as appropriate)
- Construction and manufacturing methodologies
- Work Packs
- Work instructions (e.g. refuelling and servicing)

PLANNING FOR HIGH RISK ACTIVITIES

Each project or workplace environmental management plan must outline the proposed approach for planning for high environmental risk activities. For all activities that have the potential to cause high-risk environmental impacts or are considered environmentally high-risk activities, as determined from the project environmental risk assessment, an activity specific method statement is to be developed and implemented. Activity specific work method statements may include but are not limited to:

- Work Packs
- Environmental Work Method Statements (EWMS)
- Safe Work Method Statements (SWMS)
- Construction Work Methods

The activity specific work method statements relevant to high environmental risk impacts are to include the following:

- 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 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 requirements from environmental conditions of approval, contract and legal obligations
- Identification of any environmental and/or socially sensitive areas, sites or places

The performance of the implemented mitigation measures must be monitored and assessed in accordance with the project's assurance program and HSE activity schedule.

The Severe Environmental Risk's (SERs) and critical controls, as relevant to high-risk activities are to be used during the planning phase. Critical controls identified in the SERs must be incorporated into the activity specific work method statements.

The SER process is to be applied to environmental high-risk activities.

Where necessary, additional SERs may be developed to address high risk activities.

The activity specific work method statement to address environmental high-risk activities may be combined with existing construction planning documentation as outlined above and is to be developed in consultation with the environmental team, engineering team, relevant workplace supervisors and supply chain partners.

Prior to the commencement of the activity, the site team shall be trained on the key environmental risks and the controls provided in the activity specific construction work method statement to address high risk activities.

Supply chain partners involved in these activities or who have been identified as high risk through the Health Safety Environment and Quality (HSEQ) Package Grading system during the procurement phase are to complete an environmental risk assessment workshop prior to the commencement of the activity. The identified risks and controls are to be contained in their activity specific construction work method statements

High-risk activities include the following:

- Activities that impact on environmentally sensitive areas and on Aboriginal heritage sites
- Activities that involve work in waterways and/ or that pose a risk to receiving water quality
- Construction and operation of sediment basins or water retaining structures
- Construction of bridges or culverts and flow diversions
- Piling
- Abrasive blasting
- Vegetation clearing and grubbing
- Concrete washout, painting or plaster washout
- Sewage construction or diversion works involving existing sewage systems
- Commissioning of systems with environmental impacts
- Management of contaminated materials and spoil
- Installation, use and decommissioning of any temporary working platforms in a waterway
- Activities that generate high levels of noise and/or vibration near sensitive receptors
- Activities with the potential to encounter acid sulfate soils

ENVIRONMENTAL CONTROL PLANS

For each site, Environmental Control Plans (ECPs) (may include Environmental Control Maps (ECMs) or Worksite Environmental Management Plans (WEMPs)) are to be developed to outline the location of protection measures, monitoring requirements, sensitive receivers and environmentally sensitive areas.

The Environmental Control Plan should be included as information in tender documents to subcontractors where applicable and in support of ancillary environmental approvals.

ECPs are to be used in project inductions, and used during work site set-up, reviewing ongoing environmental performance.

Environmental Control Plans should include/reference the control measures and mitigation strategies outlined in the operational control documentation such as Environmental Risk Action Plans or EMP sub-plans.

Environmental Control Plans shall include the following relevant project/workplace specific details:

- The worksite layout and boundary, including entry/exit points and internal roads and clearing limits
- Location of adjoining land-use and nearest sensitive receivers

- Location and type of sediment and erosion control measures, including size / capacity of detention basins and wheel wash facilities
- Location of site offices
- Location of spill containment and clean-up equipment
- Location of worksite waste management facilities
- Hours of work applicable to the worksite (including deliveries and any restrictions on high noise generating activities)
- Location of environmentally sensitive areas (e.g. threatened species, critical habitat, contaminated areas, heritage zones, etc.)
- Vegetation and trees to be protected
- Location of known heritage (indigenous and non-indigenous) items
- Location of stormwater drainage and watercourses leading to / from the worksite
- Specific environmental management requirements from licenses, approvals or permit conditions
- Key environmental risk issues and the specific mitigation measures
- Document control and approval details

CHANGE TO PROJECT BOUNDARIES

The need for project boundary changes may arise from design change requests, changes to methodology, altered access requirements and or the inclusion of additional work scope.

The project boundary, contractors' activity boundary, worksite boundary etc is the area in which project activities are approved to be undertaken. Approval of project activities and scope of work is in accordance with the relevant local environmental planning legislation and the associated planning instruments. It is also the area that has undergone environmental assessment and defines the area that may be impacted by the project. The boundary is to be clearly delineated.

Each client and or jurisdiction in which we work has a different process or approval pathways for changing or modifying the approved project boundary.

During the project mobilisation phase, the project boundary is to be reviewed to confirm that sufficiently detailed information has been provided to accurately identify and document the project boundary. Where this is insufficient detail to accurately document the project boundary, the client or regulatory authority is to be consulted to determine the approach for determining and documenting the project boundary. Accurate documentation of the project boundary means there is sufficient geospatial information available such that the boundary may be established in the field by the Survey Team.

Work outside the approved project boundary generally has not been assessed for environmental impacts and any associated impacts and is therefore not approved. As per the paragraph above, in the case of utilities works and early works where there is limited boundary information available, the boundaries for these works are to be documented in consultation with the client and regulatory stakeholders.

Each project must have a process for the documentation of the approved project boundary and a process for modification or change to the approved project boundary. This process is to be documented in the Construction Environmental Management Plan. The approved project boundary may be documented on the ECPs / ECMs and or within the project GIS.

A change to the approved project boundary is a hold point and must be formally released through the agreed project specific processes prior to utilisation of the additional area. A permit system or alternative process must be in place to managing the handover or hand back of areas associated with a project boundary change.

The boundary change process must include and document the following:

- Likely timeframes for the assessment, review and approval of the approved project boundary.
- The approval pathway, stakeholders and approval authorities for boundary changes
- The process for updating ECMs or ECPs should there be a change to the project boundary.
- The process for communicating the change to the relevant delivery personnel
- The process for communicating the change to the supply chain, including the re-issue of ECMs / ECPs to all of the supply chain.
- The process to ensure that the new boundary is again delineated in the field

SUPPLY CHAIN ENVIRONMENTAL PLANNING

Supply chain partners are to be required to nominate relevant environmental risks and proposed mitigation measures associated with their scope of work within their project specific documentation.

This can include the following:

- Environmental Work Method Statements or methods statements that specifically include environmental mitigation measures for high risk activities
- Safe Work Method Statements for all other activities undertaken on the site
- Site specific management system documentation
- Site induction and project onboarding training

SITE SHUTDOWN PLANNING

Shutdown periods are any period over the active site life cycle in which construction activities are not planned to be undertaken for more than 3 consecutive days. This includes designated holiday periods, such as Christmas and Easter, rostered weekends in which activities are not undertaken on site for more than 3 consecutive days.

At least 2 weeks prior to any shutdown period, the project or facility leadership team is to commence shutdown planning activities. The Project or Workplace Leader is responsible for ensuring site shutdown planning is completed and documented. Shutdown planning activities shall include the following:

- Confirmation of the plant and equipment required on site to address potential environmental maintenance or emergency situations

- A plan for environmental site inspections leading up to the shutdown period. These inspections are intended to progressively confirm that site environmental controls have been established and are maintained to manage environmental risks.
- A nomination of the team members who are available during the shutdown period to address environmental issues
- Completion of the specific Shutdown Go Pack including:
 - Site map showing all key site features including high risk areas for the management of erosion and sediment control, dust and traffic
 - Approved Erosion and Sediment Control Plans for the shutdown period
 - Site Emergency Contact list (incl. internal and external resources available)
 - Incident response and notification requirements
 - Trigger descriptions and corresponding actions including erosion and sediment control matters, dust mitigation measures, bushfire response, flood preparation (i.e. inspection, mobilisation of equipment and additional resources, etc)
 - Routine inspection frequency (if required)
 - Weather monitoring i.e. SES, BOM, otherwise
 - Materials available on site to address environmental management during the shutdown period
 - Process for testing sediment basin water for discharge during the shutdown period
 - Details of the site personnel and plant resources which are available for mobilisation during the shutdown period. This must include the proposed measures to minimise the generation of dust during the shutdown period.

ENVIRONMENTAL RESOURCES

Projects and facilities have different levels of environmental risk, opportunities and environmental obligations depending on the statutory requirements, sensitivity of the receiving environment and client imposed obligation. As a result, requirements for environmental resources vary from project to project.

As a minimum requirement, each project requires an allocated environmental representative. The Laing O'Rourke leadership team is responsible for ensuring environmental resources are assigned to meet the businesses operational risks and to realise opportunities.

Each environmental representative must have demonstrated experience or training in environmental management.

The following sections provide guidance on the resourcing requirements for projects based on a qualitative risk assessment.

Significant Risk Projects

Typically require an environmental team with a Senior Environmental Manager to meet contractual obligations and addresses project risk (commercial, procurement, legal, program). Examples may include:

- Petroleum activities

- Sensitive marine projects
- Controlled Actions under the EPBC act
- Projects for which an EIS has been completed and is approved by the relevant State environmental planning regulator
- Projects involving complex statutory approvals conditions, either State or Commonwealth
- Projects with sensitive receiving environments

Medium Risk Project

Typically require a dedicated Environmental Advisor with a functional reporting line to the HSE Leader. Examples may include:

- Projects where the receiving environment is not significantly sensitive, and we have existing positive relationship with the client and local regulator
- Projects that require additional approvals to be procured by Laing O'Rourke
- Projects that require additional environmental licenses or approvals to be secured or managed by Laing O'Rourke

Low Risk

Require an allocated Environmental Representative (potentially functioning with a dual / shared role) to ensure this EMS is implemented, statutory compliance and address operational risks and opportunities.

The workplace leader is responsible for allocating the environmental function to an existing project team member. The workplace leader is also responsible for ensuring that the allocated resource is sufficiently competent in environmental management and has the required experience and/or training.

Where the environmental management role is being undertaken by the allocated resource in the absence of previous experience, a training and development plan is to be developed by the workplace leader in conjunction with the HSE Leader to ensure the minimum competency requirements are addressed within the first 3 months of commencement in the role.

COMPETENCE

Persons performing tasks that have the potential to impact Laing O'Rourke's environmental performance shall be competent on the basis of appropriate education, training and/or experience.

Environmental representative must have demonstrated experience or training in environmental management. Minimum training requirements include ISO 14001 awareness and introduction to environmental compliance and obligations.

Laing O'Rourke senior managers will complete the internal Laing O'Rourke Environmental Obligations training.

Laing O'Rourke leadership personnel are required to attend and complete the Frontline Leadership Program that includes Laing O'Rourke's environmental management requirements.

All staff will be required to attend environmental awareness training relative to their impact on the business's environmental performance.

Environmental awareness training shall address the following as it is relevant to each location. Details of the training and awareness program are provided in the environmental management plan.

- Environmental policy and objectives
- Legal requirements and due diligence
- Environmental aspects and impacts relevant to the site location
- Environmental governance
- Construction environmental management plans

During the course of a project, the Laing O'Rourke project team members may identify HSE skill development needs related to specific site risks for the project team. Additional requirements will be addressed through the project based environmental management plan.

Appropriate training and awareness programs are to be implemented for site specific skill gaps and records are to be maintained within the project records and attendance records together with a register of the HSE training that must be forwarded, on a regular basis, to the Human Capital Representative or their nominee for inclusion on the EIFY or Success Factors systems.

FORMS AND TEMPLATES

Jurisdiction specific Environmental Management Plans

[Project & Workplace Risk Assessment](#)

[Archiving](#)

[PSUM Toolbox](#)