JOHN HOLLAND

# INLAND RAIL
# ILLABO TO STOCKINBINGAL PROJECT

## Pollution Incident Response Management Plan

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# Document Control

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# 1 Revisions and Distribution

## 1.1 Revisions

Draft issues of this document are identified as Revision A, B, C etc. Following acceptance by the document approver, the first finalised revision will be Revision 0. Subsequent revisions will have an increase of "1" in the revision number (1, 2, 3 etc.).

## 1.2 Distribution

The controlled master version of this document is available for distribution as appropriate and maintained on the document management system being used on the project. All circulated hard copies of this document are deemed to be uncontrolled.

| | |
|---|---|
| Client's Representative | Conrad Strachan |
| Project Director | Justin McCarthy |
| Rail Staging Manager | Nirmalya Chakraborty |
| Environment Manager | Andy Robertson |
| Quality Manager | Rao Talada |
| Project Personnel | Aconex Distribution |

# 2 References, Definitions and Abbreviations

## 2.1 Definitions and Abbreviations

Definitions and abbreviations to be applied to this Pollution Incident Response Management Plan are listed in Table 2-1.

**Table 2-1 Definitions and Abbreviations relevant to this Plan**

| Term / Abbreviation | Definition / Expanded text |
|---|---|
| Activity Method Statement (AMS) | A pack of relevant construction documents that contains relevant information for site engineers and foremen to manage and construct the works. There will be multiple AMS documents contained in a Workplace Risk Assessment. An AWS work method statements, risk assessments, safe work method statements, inspection and test plans, drawings, site instructions, environmental controls, etc. |
| Ancillary Facility | Temporary facility for construction of the CSSI including an office and amenities compound, construction compound, material crushing and screening plant, materials storage compound, maintenance workshop, testing laboratory or a fixed material stockpile area and carparking facilities. |
| ARTC | Australian Rail Track Corporation |
| AWS | Automatic Weather Station |
| BMSP | Biodiversity Management Sub-Plan |
| BoM | Bureau of Meteorology |
| CCS | Community Communication Strategy |
| CEMP | Construction Environmental Management Plan |
| CoA | Conditions of Approval |
| CSSI | Critical State Significant Infrastructure, as generally described in Schedule 1 (of the Conditions of Approval), the carrying out of which is approved under the terms of the Conditions of Approval. |
| DPHI | NSW Department of Planning, Housing and Infrastructure, formerly NSW Department of Planning and Environment (DPE) |
| EIS | The Environmental Impact Statement referred to in Condition A1 submitted to the Planning Secretary seeking approval to carry out the CSSI described in it, as revised if required by the Planning Secretary under the EP&A Act, and including any additional information provided by the Proponent in support of the application for approval of the CSSI |
| EMS | Environmental Management System |
| Environment | Includes all aspects of the surroundings of humans, whether affecting any human as an individual or in his or her social groupings. |
| EPA | Environment Protection Authority |
| EP&A Act | *Environmental Planning and Assessment Act 1979* |
| EPBC Act | Commonwealth *Environment Protection and Biodiversity Conservation* |
| EPL | Environment Protection Licence under the *Protection of the Environment Operations Act 1997* |
| ESCP | Erosion and Sediment Control Plan |
| ER | Environmental Representative for the CSSI as approved by the Planning Secretary |
| IMS | John Holland Integrated Management System |

| Term / Abbreviation | Definition / Expanded text |
|---|---|
| Incident | An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. |
| IRPL | Inland Rail Pty Ltd |
| I2S | Inland Rail – Illabo to Stockinbingal Project |
| JHG | John Holland Group |
| LGA | Local Government Area |
| Material Harm | is harm that:<br>involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or<br>results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment). |
| NSW | New South Wales |
| PIRMP | Pollution Incident Response Management Plan (this Plan) |
| POEO Act | Protection of the Environment Operations Act 1997 |
| POEO(G) Regulation | Protection of the Environment Operations (General) Regulation 2022 |
| Pollution incident | An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise. |
| I2S | Inland Rail – Illabo to Stockinbingal Project |
| Safety Data Sheet (SDS) | A document that provides information on the properties of hazardous chemicals and how they affect health and safety in the workplace. |
| SEP | Site Environmental Plan |
| SSI | State Significant Infrastructure |
| WHS | Workplace Health and Safety |

## 2.2 Compliance Roadmap

This Plan has been prepared in compliance with the requirements of the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2022 (POEO(G) Regulation). The plan addresses the statutory obligations outlined in Part 5.7A of the POEO Act, which mandates the preparation, implementation, and maintenance of a PIRMP for activities covered by an Environment Protection Licence (EPL). Specifically, EPL 22021, issued to John Holland Group (JHG), requires compliance with sections 153A–153F of the POEO Act, including provisions for plan preparation, information inclusion, testing, and implementation.

The following compliance matrix (Table 2-2) provides a detailed breakdown of the specific legislative requirements under the POEO Act and POEO(G) Regulation, along with references to where each requirement is addressed within this Pollution Incident Response Management Plan (PIRMP).

**Table 2-2 Compliance Matrix**

| Source | Section/Clause | Requirement | Where addressed |
|---|---|---|---|
| POEO Act | Part 5.7A | Duty to prepare and implement pollution incident response management plan | This plan |
| POEO Act | 153A | Duty of licence holder to prepare pollution incident response management plan<br>The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.<br>Maximum penalty:<br>a) in the case of a corporation—$1,000,000 and, in the case of a continuing offence, a further penalty of $120,000 for each day the offence continues, or<br>b) in the case of an individual—$250,000 and, in the case of a continuing offence, a further penalty of $60,000 for each day the offence continues.<br>Note. An offence against this section committed by a corporation is an executive liability offence attracting executive liability for a director or other person involved in the management of the corporation—see section 169A. | EPA has issued JHG with EPL 22021. JHG has prepared this PIRMP to comply with this requirement. |
| POEO Act | 153B | EPA may direct other persons to prepare pollution incident response management plan<br>(1) The EPA may, in accordance with the regulations, require the occupier of premises at which industry is carried out to prepare a pollution incident response management plan that complies with this Part in relation to activities at the premises.<br>(2) A person must not fail to comply with such a requirement.<br>Maximum penalty:<br>(a) in the case of a corporation—$1,000,000 and, in the case of a continuing offence, a further penalty of $120,000 for each day the offence continues, or<br>(b) in the case of an individual—$250,000 and, in the case of a continuing offence, a further penalty of $60,000 for each day the offence continues.<br>Note. An offence against subsection (2) committed by a corporation is an executive liability offence attracting executive liability for a director or other person involved in the management of the corporation—see section 169A.<br>(3) The regulations may make provision for or with respect to:<br>(a) the class or classes of premises, or industries carried out at premises, that may be the subject of a requirement to prepare a pollution incident response management plan, and | EPA has issued JHG with EPL 22021. JHG has prepared this PIRMP to comply with this requirement. |

| Source | Section/Clause | Requirement | Where addressed |
|---|---|---|---|
| | | (b) the circumstances in which some or all premises within those classes may be the subject of a requirement to prepare a pollution incident response management plan. | |
| POEO Act | 153C | Information to be included in plan<br>A pollution incident response management plan must be in the form required by the regulations and must include the following:<br>a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:<br>i. the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and<br>ii. the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and<br>iii. any persons or authorities required to be notified by Part 5.7, | Section 4 (Notifications), Section 5 (Pollution Impacts), Section 6 (Documentation), and Appendix A (Site Layout Drawings) |
| | | b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution, | Section 5.3 (Actions to Minimise and Control Pollution) |
| | | c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made, | Section 4.3 (Intervention by Emergency Services) |
| | | d) any other matter required by the regulations. | Refer to POEO (G) Regulation requirements below |
| POEO Act | 153D | Keeping of plan<br>A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.<br>Maximum penalty:<br>a) in the case of a corporation—$1,000,000 and, in the case of a continuing offence, a further penalty of $120,000 for each day the offence continues, or<br>b) in the case of an individual—$250,000 and, in the case of a continuing offence, a further penalty of $60,000 for each day the offence continues. | Section 10.1 (Availability of this plan) |

| Source | Section/Clause | Requirement | Where addressed |
|---|---|---|---|
| | | Note. An offence against this section committed by a corporation is an executive liability offence attracting executive liability for a director or other person involved in the management of the corporation—see section 169A. | |
| POEO Act | 153E | Testing of plan<br>A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.<br>Maximum penalty:<br>a) in the case of a corporation—$1,000,000 and, in the case of a continuing offence, a further penalty of $120,000 for each day the offence continues, or<br>b) in the case of an individual—$250,000 and, in the case of a continuing offence, a further penalty of $60,000 for each day the offence continues.<br>Note. An offence against this section committed by a corporation is an executive liability offence attracting executive liability for a director or other person involved in the management of the corporation—see section 169A. | Section 10.2 (Testing this Plan) |
| POEO Act | 153F | Implementation of plan<br>If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.<br>Penalties apply | Section 3.1 (Purpose of this PIRMP) and Section 4 (Notifications) |
| POEO(G) Regulation | 71 | Form of plan<br>(1) A plan is to be in written form.<br>(2) A plan may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document. | This Plan |
| POEO(G) Regulation | 72 | Additional matters to be included in plan<br>Note. See also section 153C (a)–(c) of the Act.<br>(1) General<br>The matters required under section 153C (d) of the Act to be included in a plan are as follows:<br>(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity), | Section 5.1 (Aspects and potential pollution impacts) |
| | | (b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood, | Section 5.1 (Aspects and |

| Source | Section/Clause | Requirement | Where addressed |
|---|---|---|---|
| | | | potential pollution impacts) |
| | | (c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity, | Section 9.1.2 (Pre-emptive actions) |
| | | (d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity, | Appendix B (Indicative inventory of potential pollutants) |
| | | (e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates, | Appendix B (Indicative inventory of potential pollutants) |
| | | (f) a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident, | Section 9.1.4 (Safety Equipment) |
| | | (g) the names, positions and 24-hour contact details of those key individuals who:<br>i. are responsible for activating the plan, and<br>ii. are authorised to notify relevant authorities under section 148 of the Act, and<br>iii. are responsible for managing the response to a pollution incident, | Section 3.4 (Roles and responsibilities) |
| | | (h) the contact details of each relevant authority referred to in section 148 of the Act, | Section 4.1 (External Notification Protocol) |
| | | (i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on, | Section 4.2 (Community Notification and Action Protocol) |
| | | (j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on, | Section 9.1.3 (Minimising harm to persons on the premises) |
| | | (k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises, | Appendix A |
| | | (l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk, | Section 5.3 (Actions to Minimise and Control Pollution) |
| | | (m) the nature and objectives of any staff training program in relation to the plan, | Section 9.1.1 (Training) |

| Source | Section/Clause | Requirement | Where addressed |
|---|---|---|---|
| | | (n) the dates on which the plan has been tested and the name of the person who carried out the test, | Section 10.2 (Testing this Plan) |
| | | (o) the dates on which the plan is updated, | Cover sheet, revision table |
| | | (p) the manner in which the plan is to be tested and maintained. | Section 10.2 |
| | | (2) Trackable waste transporters | N/A to JHGA |
| POEO(G) Regulation | 74 | Availability of plan<br>(1) A plan is to be made readily available:<br>(a) to an authorised officer on request, and<br>(b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.<br>(2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared:<br>(a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan,<br>(b) if the person does not have such a website—by providing a copy of the plan, without charge, to any person who makes a written request for a copy.<br>(3) Subclause (2) applies only in relation to that part of a plan that includes the information required under:<br>(a) section 153C (a) of the Act, and<br>(b) clause 98C (1) (h) and (i) or (2) (b) and (c) (as the case requires).<br>(4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1). | Section 10.1 (Availability of this plan) |
| POEO(G) Regulation | 75 | Testing of plan<br>(1) The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.<br>(2) Any such test is to be carried out:<br>(a) routinely at least once every 12 months, and<br>(b) if a pollution incident occurred during an activity to which an environment protection license relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147 – within 1 month of the incident occurring. | Section 10.2 (Testing this Plan) |

# 3 Introduction

## 3.1 Purpose of this PIRMP

John Holland is committed to ensuring compliance with all relevant environmental legislation and approval conditions for the Inland Rail – Illabo to Stockinbingal (I2S) Project. As per the requirements of the Protection of the Environment Operations Act 1997 (POEO Act), a Pollution Incident Response Management Plan (PIRMP) must be prepared, maintained, tested, and implemented for activities that may pose a risk of pollution. This plan aligns with the obligations under Part 5.7A of the POEO Act.

If a pollution incident occurs during the course of project activities that causes or threatens material harm to the environment (as defined in section 147 of the POEO Act), the PIRMP must be immediately implemented to manage the incident, as required by Part 5.7A of the POEO Act.

The purposes of this PIRMP for the I2S Project are to:

- Ensure comprehensive and timely communication about a pollution incident to the project team, the NSW Environment Protection Authority (EPA), other relevant authorities specified in the POEO Act, and people in the vicinity who may be impacted by the pollution incident.
- Minimise and control the risk of a pollution incident by identifying potential risks and developing planned actions to mitigate and manage those risks.
- Ensure that the PIRMP is effectively implemented by trained personnel, clearly identifying the individuals responsible for its implementation, and ensuring the plan is regularly tested for accuracy, currency, and suitability.

## 3.2 Scope of this PIRMP

This Plan applies to the activities undertaken under Environment Protection Licence (EPL) 22021, issued to John Holland Pty Ltd for the Inland Rail – Illabo to Stockinbingal (I2S) Project. The I2S Project involves the construction of railway infrastructure as part of the Inland Rail program, which is being delivered by John Holland (and its subcontractors) for the Australian Rail Track Corporation (ARTC).

The scope of works under EPL 22021 includes the following:

- Construction of railway infrastructure over a length exceeding 30 km.
- Handling and processing of materials exceeding 2,000,000 tonnes.
- Ancillary activities such as road construction and the establishment of temporary workforce accommodation facilities.

The licensed premises for the I2S Project include the future rail corridor within the construction footprint, as defined in the EPL. The details of EPL 22021, including the scheduled activities and premises, are outlined in Table 1 of this PIRMP.

**Table 3-1 Details of EPL 22021**

| | |
|---|---|
| **Name of licensee:** | JOHN HOLLAND PTY LTD |
| **ACN** | 004 282 268 |
| **EPL number:** | 22021 |
| **Issue date:** | 26 Aug 2025 |
| **Premises name and address:** | ILLABO TO STOCKINBINGAL (FUTURE RAIL CORRIDOR IN CONSTRUCTION FOOTPRINT), STOCKINBINGAL NSW 2725 |
| **Scheduled activity/activities on EPL:** | Railway activities - railway infrastructure construction |

## 3.3 Interface with other management plans

The Construction Environmental Management Plan (CEMP) serves as the overarching document for managing environmental risks and compliance during the construction phase of the Inland Rail – Illabo to Stockinbingal (I2S) Project. It integrates and aligns with a suite of issue-specific management plans, sub-plans, and monitoring programs to ensure a coordinated approach to environmental management.

Subject-specific environmental management sub-plans have been prepared to support the CEMP. These documents have been prepared to identify requirements and processes applicable to specific impacts or aspects of the Project. They address the relevant requirements State Conditions of Approval (CoA) (SSI-9406) and the Federal Approval (EPBC 2018/8233). A list of construction management plans is provided in Table 3-2.

**Table 3-2 CEMP Sub-Plans**

| Plan Name | Document Number |
|---|---|
| Noise and Vibration Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0054 |
| Biodiversity Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0055 |
| Traffic, Transport and Access Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0056 |
| Soil and Water Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0058 |
| Heritage Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0059 |
| Flood Emergency Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0062 |
| Biosecurity Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0061 |
| Air Quality Management Sub Plan | I2S_5-0019-220-PMA-00-PL-0072 |
| Contaminated Land and Hazardous Material Management Plan | I2S_5-0019-220-PMA-00-PL-0070 |
| Groundwater Mitigation and Management Sub-Plan | I2S_5-0019-220-PMA-00-PL-0069 |
| Waste Management Sub-Plan | I2S_5-0019-220-PMA-00-PL-0071 |

The Pollution Incident Response Management Plan is specifically designed to address pollution incidents and emergency situations, ensuring compliance with the Protection of the Environment Operations Act 1997 (POEO Act) and the requirements of the Environment Protection Licence (EPL 22021).

The PIRMP supports the CEMP in the following ways:

- The PIRMP outlines specific procedures for identifying, reporting, and responding to pollution incidents, as required under Section 8.2.2 of the CEMP.
- It ensures compliance with the Protection of the Environment Operations Act 1997 (POEO Act) by detailing notification protocols for pollution incidents, including notifying the EPA and other relevant authorities.
- The PIRMP provides a framework for managing pollution incidents and environmental emergencies, as highlighted in Section 8.3 of the CEMP.
- The PIRMP references and incorporates other sub-plans under the CEMP, such as:
    - Flood Emergency Management Sub-Plan for managing flood-related pollution risks.
    - Contaminated Land and Hazardous Material Management Plan for handling hazardous substances.
    - Air Quality Management Sub-Plan for managing dust and air pollution.
- The PIRMP supports the incident investigation process outlined in Section 8.4 of the CEMP, ensuring:
    - The cause, extent, and responsibility for incidents are identified.
    - Corrective actions are implemented to prevent recurrence.

- Relevant government agencies are notified if substantial pollution occurs.

- Lessons learned from incident investigations are used to update the CEMP and improve environmental management practices.

- The PIRMP aligns with the monitoring and reporting requirements outlined in Section 9 of the CEMP, ensuring:

  - All incidents are recorded, tracked, and reported in accordance with the CEMP and EPL conditions.

  - Non-compliances and corrective actions are documented and communicated to relevant stakeholders, including the EPA, Inland Rail, and the Environmental Representative (ER).

The PIRMP is subject to regular review and testing as part of its compliance obligations under the POEO Act. These reviews ensure that the plan remains effective, relevant, and aligned with the project's environmental management framework.

## 3.4 Roles and responsibilities

All project personnel are responsible for protecting the environment and preventing incidents. The roles and responsibilities relevant to this PIRMP are identified in Table 3-2. In the event that the relevant person is not available, the role will be performed by the next most senior representative in the same discipline.

**Table 3-3 Roles and Responsibilities**

| Title | Roles and responsibilities relevant to this plan |
|---|---|
| I2S Project Director | • Oversee the preparation and implementation of this PIRMP<br>• Notify IRPL if this plan is activated.<br>• Report to John Holland and Gamuda corporate personnel as appropriate, if this plan is activated. |
| I2S Project Operations Manager | • Ensure specific resources are identified, provided and maintained for the duration of the project to implement this PIRMP, including incident response measures and clean-up activities. |
| I2S Environment and Sustainability Manager | • Ensure this PIRMP satisfies the requirements of the POEO Act and POEO (G) Regulation<br>• Assess any pollution incident to determine if there is a risk of material harm to the environment and notify the Project Director if activation of this plan is required.<br>• Notify relevant authorities in accordance with this plan if required to do so.<br>• Point of contact with EPA and other environmental authorities in the event of an environmental incident.<br>• Ensure this plan is regularly reviewed and tested to ensure information included in the plan is accurate and up to date. |
| I2S Community and Stakeholder Manager | • Assist the Environment and Sustainability Manager to identify stakeholders who require notification of the pollution incident.<br>• Notify communications and media teams of the pollution incident.<br>• Coordinate community / stakeholder notification in the event of an incident, with agreed IRPL approvals.<br>• Notify community / stakeholders of clean-up activities where appropriate. |
| I2S Construction Manager | • Ensure specific resources (including personnel, plant, equipment and materials) are identified, provided and maintained for the duration of the project to implement this PIRMP, including incident response measures and clean-up activities.<br>• Ensure the provisions of this PIRMP are implemented, e.g. training requirements, resource allocations, desktop and mock rehearsals. |

| Title | Roles and responsibilities relevant to this plan |
|---|---|
| I2S Area Manager | • In consultation with the Environment and Sustainability Manager, determine if this PIRMP is to be activated.<br>• Assist the JHG Construction Manager to ensure specific resources are identified, provided and maintained for the duration of the project to implement this PIRMP, including incident response measures and clean-up activities.<br>• Assist the JHG Construction Manager to ensure that the provisions of this PIRMP are implemented, e.g. training requirements, resource allocations, desktop and mock rehearsals.<br>• Notify environmental personnel immediately in the event of an environmental incident |
| I2S Site Supervisor / Superintendent / Foreperson | • Assist the JHG Construction Manager to ensure that the provisions of this PIRMP are implemented, e.g. desktop and mock rehearsals.<br>• Notify environmental personnel immediately in the event of an environmental incident<br>• The most senior JHG Superintendent / Site Supervisor for an area or shift on site during an incident also serves the role of the Site Incident Controller as defined in the Incident Response Plan. |
| WHS Manager | • Implement notification protocol for relevant agencies.<br>• Point of contact with Emergency Services and SafeWork NSW in the event of an incident. |
| All I2S personnel, sub-contractors and visitors | • Understand environmental management and notification requirements.<br>• Notify supervisor immediately in the event of an environmental incident.<br>• Implement pollution controls when necessary / as directed by supervisor or environmental staff. |
| Environmental Representative | • Notified in the event of an environmental incident. |
| Inland Rail | • Notified in the event of an environmental incident. |

## 3.5 Background

### 3.5.1 The Project

The Project is located in south-western New South Wales (NSW) in the Riverina region (refer to Figure 3-1). Illabo is a small town located at the southern end of the alignment 16 kilometres (km) north-east of Junee in the Junee Local Government Area (LGA).

Stockinbingal is situated at the northern end of the Project, approximately 20 km north-west of Cootamundra in the Cootamundra–Gundagai Regional LGA. The major towns surrounding the Project are Wagga Wagga, about 50 km to the south, Young to the north-east and Cootamundra to the east.

The Project comprises a new rail corridor that would connect Illabo to Stockinbingal. The alignment branches out from the existing rail line north-east of Illabo and travels north to join the Stockinbingal–Parkes Line west of Stockinbingal. The route will travel primarily through undeveloped land predominantly used for agriculture.

The Project includes modifications to the tie-in points at Illabo and Stockinbingal to allow for trains to safely enter and exit the Illabo to Stockinbingal section of Inland Rail. The alignment also crosses several local and private roads, watercourses and privately owned properties. Additionally, no major towns are located within the Project site between Illabo and Stockinbingal.

The Project will include a total extent of approximately 42.5 km, including 39 km of new, greenfield railway which will incorporate the following key features:

- single track standard gauge on a combination of existing ground level embankments and within cuttings
- new bridges and road overpasses

- crossing loop and maintenance siding
- new level crossings, stock crossings and upgrades to existing level crossings
- new major stormwater diversion and minor drainage works associated with installation and upgrades to culverts.

The Project will also include upgrades to approximately 3 km of existing track associated with tie-in works and construction of an additional 1.7 km of new track to maintain the existing rail network connections. Road upgrade works will also be undertaken to re-align approximately 1.4 km of Burley Griffin Way to provide a road-over-rail bridge at Stockinbingal. Re-alignment of Ironbong Road will also be completed to allow for safe sight lines. A temporary workforce accommodation camp will also be constructed to house the workforce for the duration of the Project.

A detailed Project description is provided in Section 3 of the CEMP. Key features of the Project are shown on Figure 3-2.

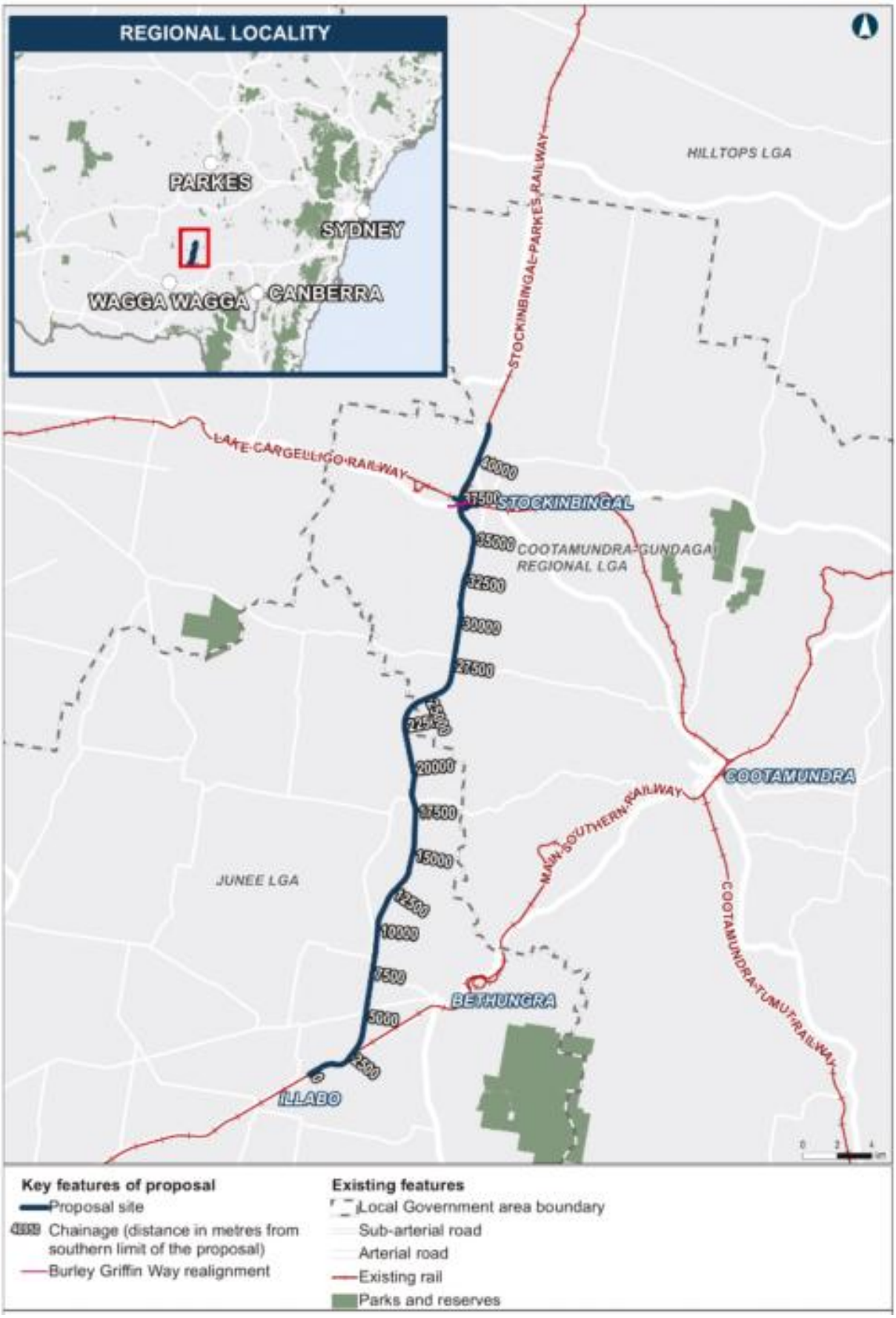


**Figure 3-1 Project locality (Source: Illabo to Stockinbingal - Environmental Impact Statement, 2022)**

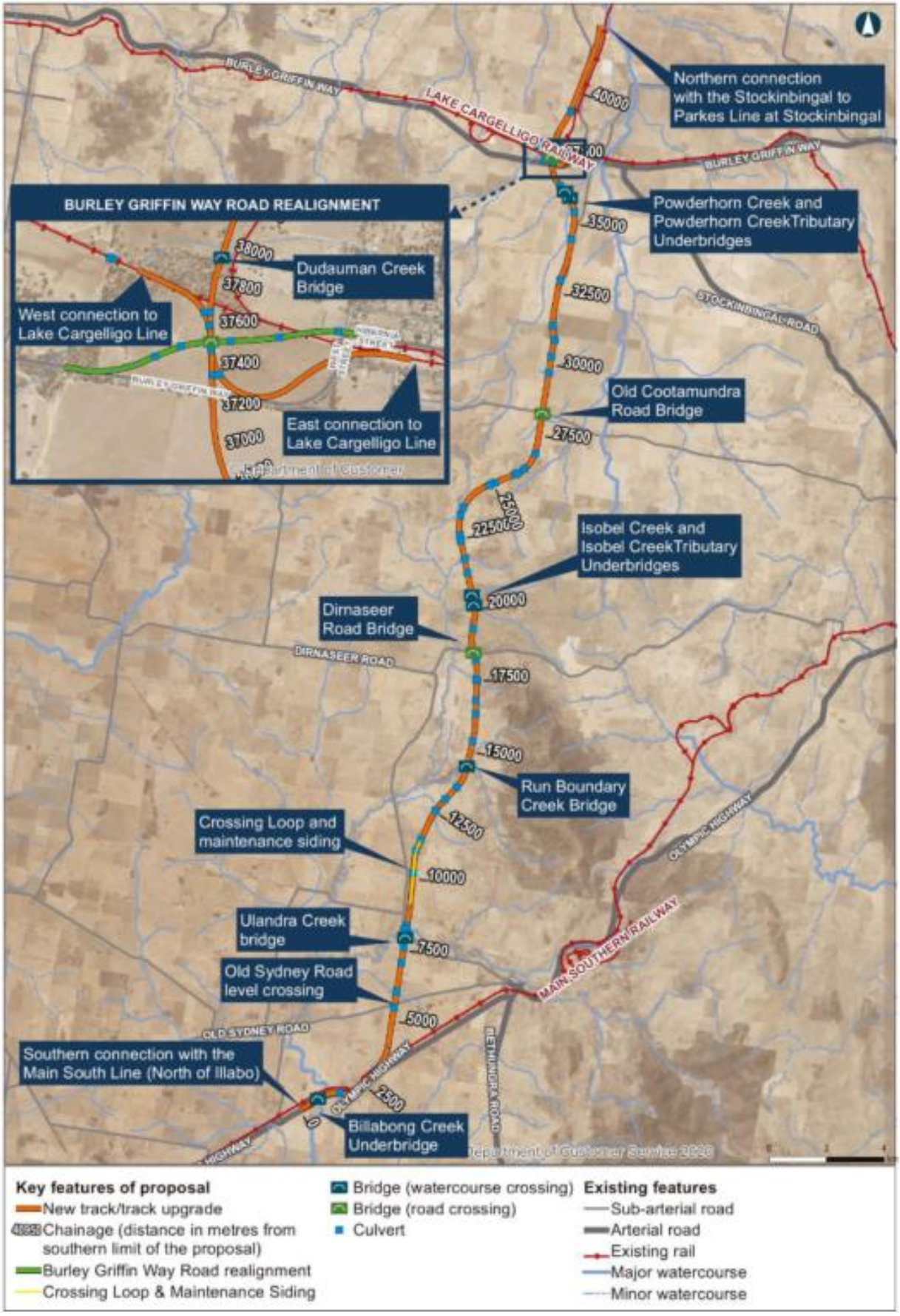


**Figure 3-2 Key Project features (Source: Illabo to Stockinbingal - Environmental Impact Statement, 2022)**

### 3.5.2 Statutory Context

The Project was declared Critical State Significant Infrastructure (CSSI) in 2021, requiring approval under Division 5.2 of the NSW Environmental Planning and Assessment Act 1979. In accordance with the Secretary's Environmental Assessment Requirements (SEARs) (dated 30 April 2021), an EIS was prepared by Australian Rail Track Corporation (ARTC) in August 2022. The EIS was exhibited by the Department of Planning, Housing and Infrastructure (DPHI) for a period of six (6) weeks, commencing on 14 September 2022 and concluding on 26 October 2022.

Following public exhibition of the EIS, ARTC prepared a Submissions Report to respond to submissions and describe Project design refinements.

Approval for the Project was granted on 4 September 2024 by the Minister for Planning (SSI-9406) and was subject to a number of CoAs.

The Project was determined to be a controlled action under the EPBC Act. The Project received EPBC Controlled Action Approval from Department of Climate Change, Energy, the Environment and Water (DCCEEW) (EPBC Referral 2018/8233) on 28 October 2024.

# 4 Notifications

John Holland, as part of the Inland Rail – Illabo to Stockinbingal (I2S) Project, is committed to ensuring timely and effective communication with neighbours and the local community in the event of a pollution incident. The process for notifying stakeholders of a notifiable pollution incident will depend on the nature and severity of the hazard. If there is an unacceptable risk to the community, impacted stakeholders will be notified promptly using appropriate communication mechanisms.

A pollution incident is required to be notified to relevant agencies and authorities if there is a risk of 'material harm' to the environment. In section 147 of the POEO Act, harm to the environment is material if it:

- Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations).

Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

The Environment and Sustainability Manager (or next most senior environmental personnel), in consultation with the appropriate Construction Project Manager, will determine whether or not an incident is likely to cause or threaten material harm to the environment and whether or not this PIRMP will be activated.

## 4.1 External Notification Protocol

The following authorities must be contacted in the order below immediately for pollution incidents that threaten or cause material harm to the environment. This means promptly and without delay

**Table 4-1 Contact lit of authorities**

| Authority | Phone Number |
|---|---|
| EPA Hotline | 13 15 55 |
| EPA (EPA Officer) | (02) 9995 6816 |
| Ministry of Health – via the local Public Health Unit | https://www.health.nsw.gov.au/Infectious/Pages/phus.aspx |
| Workcover NSW | 131 050 |
| Local Authority – Cootamundra-Gundagai Regional Council and Junee | 1300 459 689 and (02) 6924 8100 |
| Fire and Rescue NSW | 000 |
| ARTC (for works within the ARTC rail corridor land) | 0448 870 613 |

Where possible, information to be provided to the authorities should include:

- The time, date, nature and duration and location of incident;
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- The circumstances in which the incident occurred, including the cause of the incident, if known;
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known; and
- Other information prescribed by the regulations.

Additional parties may also be notified as identified in Table 4-2.

**Table 4-2 Additional notification requirements**

| Relevant authority | Contact details | JHG personnel responsible to contact authority |
|---|---|---|
| Secretary of NSW Department of Planning, Industry and Environment | Major Projects Website | Environment and Sustainability Manager |
| Department of Primary Industries – Water* | 1800 353 104 | Environment and Sustainability Manager |

*DPI-Water have requested to be notified as soon as practicable in the event that an incident threatens or causes material harm to groundwater resources, waterways or ecosystems.

## 4.2 Community Notification and Action Protocol

Residential, commercial, transport and recreational areas surround the project and may be impacted by the project. Neighbours and the local community generally refer to the following:

- Residents near construction sites and compounds;
- Residents in surrounding suburbs;
- Motorists;
- Cyclists and pedestrians; and
- Local business owners, tenants and customers

In the event of a potential or actual pollution incident, whether or not stakeholders and the local community are notified depends on the incident type and severity. Community stakeholder notification of an environmental incident, as it occurs, is required for events that:

- Will result in unacceptable health risk to community and stakeholders immediately and at the time of the pollution incident, where community stakeholders are present (e.g. residing in their houses or using adjacent recreational facilities at the time of the incident); or
- Will result in an unacceptable health risk to the community for instances where pollution of an area that is to be used by community members in the days and weeks following the incident (until such time when the pollution hazard is removed). These community stakeholders may not be present during the incident but might be present following the incident.

An unacceptable impact is defined as one which has the potential to adversely affect the health of a member of the community. This takes into consideration immediate health impacts (that occur during the incident) and health risks in the period following the incident.

The Environment and Sustainability Manager, in consultation with the relevant Area Manager and the Community Relations Manager will determine if community notification is recommended, the mechanisms by which the notification is made and the extent of the notification. If appropriate, notification will include specific information to minimise the risk of harm, e.g. instructions to close windows and doors, or avoid contact with creeks/waterways.

The Community and Stakeholder Manager will consult with IRPL in regards to the agreed notification strategy and coordinate the approvals and notification of surrounding premises and residents. Communication methods vary depending on the audience (e.g. drivers, nearby park users, etc.) and may include:

- Face to face and/or telephone contact;
- Letterbox drops;
- Update to project website;
- Email distribution of messages;
- Provide protective fencing and barricading to prevent community stakeholders from entering into an affected area

- Use of technology such as variable message signs and other signage and radio communications
- Media release by IRPL

Surrounding residents and other land users may also need to be notified at the direction of Emergency Services (e.g. Fire and Rescue), the EPA or the Ministry of Health, depending on the nature and extent of the incident.

Clean-up activities may require community notifications, as part of JHGA 'no surprises' approach to the community engagement and work activity.

## 4.3 Intervention by Emergency Services

If engaged, personnel from the applicable Emergency Services are responsible for directing the control and management of any incident in consultation with the John Holland and Inland Rail, once they arrive on site. This may include the evacuation or notification of stakeholders if required. JHGA will be the main point of contact for the Emergency Services once the agency has arrived on site.

# 5 Pollution Impacts

## 5.1 Aspects and potential pollution impacts

John Holland will use a risk management approach during all stages of the project to identify, assess, control and review environmental risks. An environmental risk assessment has been undertaken for the project and is included in Appendix C.

Throughout the project, environmental risks and opportunities are primarily considered through:

- The risk assessment undertaken during the development of the environmental impact statement;
- The Principal Risk Assessment conducted at bid stage for major tangible risks;
- Safety-in-design workshops conducted throughout the project, which will include environmental considerations, where appropriate;
- Workplace Risk Assessment;
- Activity Method Statements;
- Project pre-start meetings.

The Environment and Sustainability Manager is generally involved in, or has approval authorities, for most risk assessment types listed above to raise and address environmental risks and opportunities. Environmental risks, controls and responsibilities will be communicated through the preparation and implementation of Activity Method Statements, Environmental Work Method Statements (EWMS), toolbox talks and pre-start meetings, as appropriate.

## 5.2 Inventory of pollutants

An indicative inventory of potential pollutants has been prepared and is located in Appendix B, including the location and maximum quantity likely to be stored or held on that site. For details of chemicals and hazardous substances actually present on site, refer to the Chemwatch database.

Site Environmental Plans (SEP) will be developed for each site identifying the location of chemical storage areas and spill kits. For areas identified as flood-prone, such as those near Billabong Creek, Ulandra Creek, and Dudauman Creek, the plan will include measures to secure hazardous materials, equipment, and stockpiles to prevent contamination of watercourses.

Temporary bunding and sediment control structures will be installed to manage runoff and minimise sedimentation. In the event of a predicted rainfall event, site activities will be adjusted to avoid high-risk operations, and pre-emptive measures, such as relocating materials to higher ground and reinforcing erosion controls, will be implemented. Flood levels from the 1% Annual Exceedance Probability (AEP) event will guide the placement of controls to ensure they remain effective under extreme conditions. These measures will be reviewed and updated regularly to align with flood modelling and site-specific conditions. Testing and dewatering of sediment basins/holding tanks will be undertaken prior to high-rainfall events to minimise the risk of holding areas overtopping and maximise holding capacity for emergency dewatering activities.

Project SEPs and areas identified as flood-prone are included in Appendix A.

## 5.3 Actions to Minimise and Control Pollution

Actions to minimise and control any pollution, ensure the safety of site personnel, neighbours, and the community, and appropriately clean up pollution and dispose of waste will be determined by the John Holland Environment and Sustainability Manager in consultation with the Safety Manager and the Site Supervisor.

**Table 5-1 Potential incidents and response actions**

| Type of Incident | Description of Incident | Response Actions |
|---|---|---|
| Water or Land | Leak, spill or escape of any substance in a manner that harms or is likely to harm the environment.<br>Examples include:<br>• Discharge of untreated water from site during<br>• wet weather event<br>• Sewer or watermain strike (loss of sediment<br>• and polluted water to land, stormwater or<br>• receiving waterways)<br>• Generator leak to land<br>• Fuel spill to land<br>• Spill of non-destructive digging material during<br>• transfer | Deploy spill kit materials to contain and absorb the spill.<br>• Establish and/or strengthen controls around<br>• stormwater drains including drain wardens<br>• and sandbags around the drain perimeter.<br>• Mobilise a vacuum truck to remove excess<br>• water/liquid from the site and dispose to an<br>• appropriately licensed facility.<br>• Remove used spill kit materials from the site<br>• and dispose to an appropriately licensed<br>• facility.<br>• Ensure spill kits are restocked following the<br>• event. |
| Noise | Excessive or intrusive noise emissions arising from:<br>• Inadequate controls<br>• Poorly maintained plant/equipment<br>• Failure to comply with Out of Hours Works<br>• Permit | • Cease noise generating activity if an approved Out of Hours Works Permit is not in place.<br>• Ensure equipment is adequately maintained.<br>• Conduct noise monitoring to determine if noise<br>• levels are in accordance with predicted levels.<br>• Replace noisy equipment with quieter<br>• alternatives.<br>• Review controls and revise as necessary |
| Air | Excessive and intrusive dust emissions | Cease dust generating activity.<br>Apply dust suppression (water cart, hose, etc).<br>• Review the adequacy of controls (e.g. dust<br>• suppression, site barriers).<br>• Recommence works following implementation<br>• of controls, and monitor effectiveness.<br>• In the event of high winds, reschedule works if<br>• dust cannot be controlled to reasonable levels. |

### 5.3.1 Training

All project personnel will be informed of project environmental obligations during the project induction. Specific follow up training may include toolbox talks or formal staff training on incident management. Objectives of the training will include making personnel aware of:

- The PIRMP;
- Their duty to notify actual or potential environmental incidents; and
- Actions in the event of an environmental incident.

Targeted training sessions will be held for those key personnel with specific responsibilities relating to the PIRMP activation and implementation. Training sessions may be incorporated into testing of the PIRMP, which is described in Section 6.2 of this plan.

Environmental training needs will be identified by the Environment and Sustainability Manager. All training records will be maintained on 3DS.

#### 5.3.1.1 Toolbox Talks

Toolbox talks will raise awareness and educate personnel on issues related to all aspects of construction including environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction. Toolbox talks will be tailored to specific environmental issues relevant to upcoming works. Key environmental issues relevant to construction of the I2S works include (but are not limited to):

- Hours of work, including management strategies to be implemented for out of hours works
- The scope and requirements of the specific site environment plans
- Erosion and sediment control
- Wet weather shut down procedures and responsibilities
- Emergency and spill response
- Noise and vibration goals and specific mitigation measures
- Soil and water issues and controls and dewatering and discharge requirements
- Air quality and dust issues and management
- Contamination issues and management
- Sensitive receivers such as the local community and appropriate mitigation measures
- Recent environmental incidents and lessons learnt.

#### 5.3.1.2 Daily Pre-Start Meeting

The pre-start meeting is a tool for informing the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day's work. Site Supervisors will conduct a daily pre-start meeting with the site workforce before the commencement of work each day, at the start of each new shift, or when there are changes to work activities or the risks present onsite during a shift. The environmental component of pre-starts will be developed by the E&S Manager and will include any environmental issues that could potentially be impacted by, or impact on, the day's construction activities

### 5.3.2 Pre-emptive actions

Pre-emptive measures focus on the carrying out of construction activities in a controlled manner. This includes detailed construction planning and the JHGA environmental management system (EMS), which provides a framework to define how JHGA will minimise impacts to the environment and to prevent pollution incidents from occurring on the project. It comprises a combination of governance documentation, the CEMP and issue-specific sub-plans, procedures and tools.

Pre-emptive actions, identified as issue-specific management measures, are included in the CEMP sub-plans.

Environmental risks and appropriate controls are captured within the SEPs and associated Activity Method Statements. EWMS will be prepared for works in or near environmental sensitive areas and will be included in the

appropriate Activity Method Statements, which contain relevant information for site engineers and foremen to manage and construct the works in a safe and environmentally responsible manner.

### 5.3.3 Minimising harm to persons on the premises

JHGA has implemented a number of controls, procedures and plans to minimise the risk of harm to any persons who will be, or are likely to be, on the premises should an incident occur. Controls include, but are not limited to:

- Evacuation procedures that include nominated Area Wardens to control muster/assembly areas and to facilitate orderly evacuation of areas and head counts.
- Site Emergency Response Boards would be established at worksites to provide relevant information from the Incident Response Plan in a form readily accessible during an emergency.
- Risk assessments to identify and manage potential impacts / incidents / emergencies. Risks and appropriate controls are captured in the CEMP and sub-plans, Activity Method Statements, project pre-start meeting.
- Emergency equipment / resources would be available at worksites to enable key potential emergencies to be managed.
- Engage suitable consultants to provide expert medical, toxicology or environmental impact advice.

The Emergency Response Plan and the Crisis Management Plan further identify controls and procedures implemented on site to minimise the risk of harm to any persons on site in the event of an incident.

### 5.3.4 Safety Equipment

All on-site personnel will be required to wear minimal personal protective equipment (PPE) including:

- Long sleeved shirts;
- Long pants;
- Steel-toed boots;
- Safety glasses; and
- Gloves (on their person).

An indicative list of chemicals, hazardous substances and potential pollutants to be at the premises is included in Annexure B. PPE suitable for handling and using chemicals will be made available at the same compound / area where chemicals are stored.

An indicative list of emergency and safety equipment available on site includes:

- Oxy Viva Resuscitator Kit
- Automatic External Defibrillator
- Fiberglass Stokes Litter Stretcher
- Back spine boards
- Cervical neck collars
- First aid bed
- Portable trauma kit
- Standard Type B Portable first aid kit

- Eye wash facilities
- Fire blanket
- Fire extinguishers
- Rubber gloves;
- Rubber boots;
- Face shields;
- Eye goggles;
- Tyvek suits; and
- Face masks.

Spill kits are located at the site compound area, in select site vehicles and throughout the project site at the location of, or during, high risk activities. Spill kits can be used to control, contain and clean up spills and may consist of absorbent mats, granular material, containment booms and disposal bags. Spill kits will be checked as part of the weekly environmental inspection and replenished as required.

Sediment control equipment – including sandbags, gravel, geofabric and sediment fences. Other plant and equipment present at the site or sourced externally may be used in the management of a pollution incident, including excavators, sucker trucks etc. The equipment required in response to a pollution incident would be determined by the Site Superintendent in consultation with the Supply Contractor E&S Manager and Safety Manager. Emergency Response Plans and maps are displayed in strategic locations within site compound offices/notice boards, identifying safety equipment locations on-site (e.g. fire extinguishers, hose reels), assembly and evacuation points.

# 6 Documentation

## 6.1 Availability of this plan

This PIRMP will be available to all project personnel and will be available at the premises in written and electronic form. The PIRMP will be made available to an EPA officer on request.

Specific sections of this plan will be publicly available to the public on the project website and in paper to any person making a written request for a copy. The summary statement of the PIRMP will include:

- Procedures for contacting the relevant authorities; and
- Procedures for communicating with the community affected or potentially affected by a pollution incident.

The summary PIRMP may be exclusive of any personal information within the meaning of *the Privacy and Personal Information Protection Act 1998.*

## 6.2 Testing this Plan

Testing of this PIRMP may be integrated into other emergency and incident testing and training programs and may include a desktop simulation, practical exercise or drill.

The Environment and Sustainability Manager will determine the method and date of testing, and will coordinate the test, including advising all relevant personnel as required prior to the test. The testing will be carried out in such a manner as to ensure the information included in the plan is accurate and up to date and that each plan is capable of being implemented in a workable and effective manner.

As a minimum, the PIRMP will be tested at least once every 12 months or whenever there is a significant change to site activities. Additional testing may be required at the discretion of the Environment and Sustainability

Manager in response to notifiable pollution incidents. The mock exercise will involve personnel responsible for the implementation of this PIRMP. Testing program is included in Table 6-1.

A report detailing a record of the testing of the PIRMP will be prepared after each test of the PIRMP is undertaken. The report will recommend amendments to the PIRMP, if required, to ensure that the PIRMP is workable and effective in achieving the stated objectives

**Table 6-1 PIRMP testing programme**

| Focus | Timing | Key personnel |
|---|---|---|
| Desktop PIRMP simulation<br>• Awareness of PIRMP and associated controls<br>• Notifications protocol<br>• Responsibilities | Within 3 months of commencement of construction and as determined by the Environment and Sustainability Manager or senior management | • Project Director<br>• Environment and Sustainability Manager<br>• WHS Manager<br>• Area Managers<br>• Site Foremen<br>• Community and Stakeholder Manager |
| Onsite mock exercise<br>• Notifications protocol<br>• Onsite incident response actions | Yearly | • Project Director<br>• Environment and Sustainability Manager<br>• WHS Manager<br>• Area Managers<br>• Site Foremen<br>• Community and Stakeholder Manager<br>• Project personnel |
| Desktop or mock exercise (as determined by the Environment and Sustainability Manager depending on the severity of the incident) | Within one month of a pollution incident which caused or threatened material harm to the environment | As determined by the Environment and Sustainability Manager and Project Director |

# 7 Appendix A – Site Layout Drawings at Time of Issue of this PIRMP

A more detailed plan will be available on site with each Site Environmental Plan (SEP) & Erosion and Sediment Control Plan (ESCP) prepared to show on-site environmental constraints and controls.


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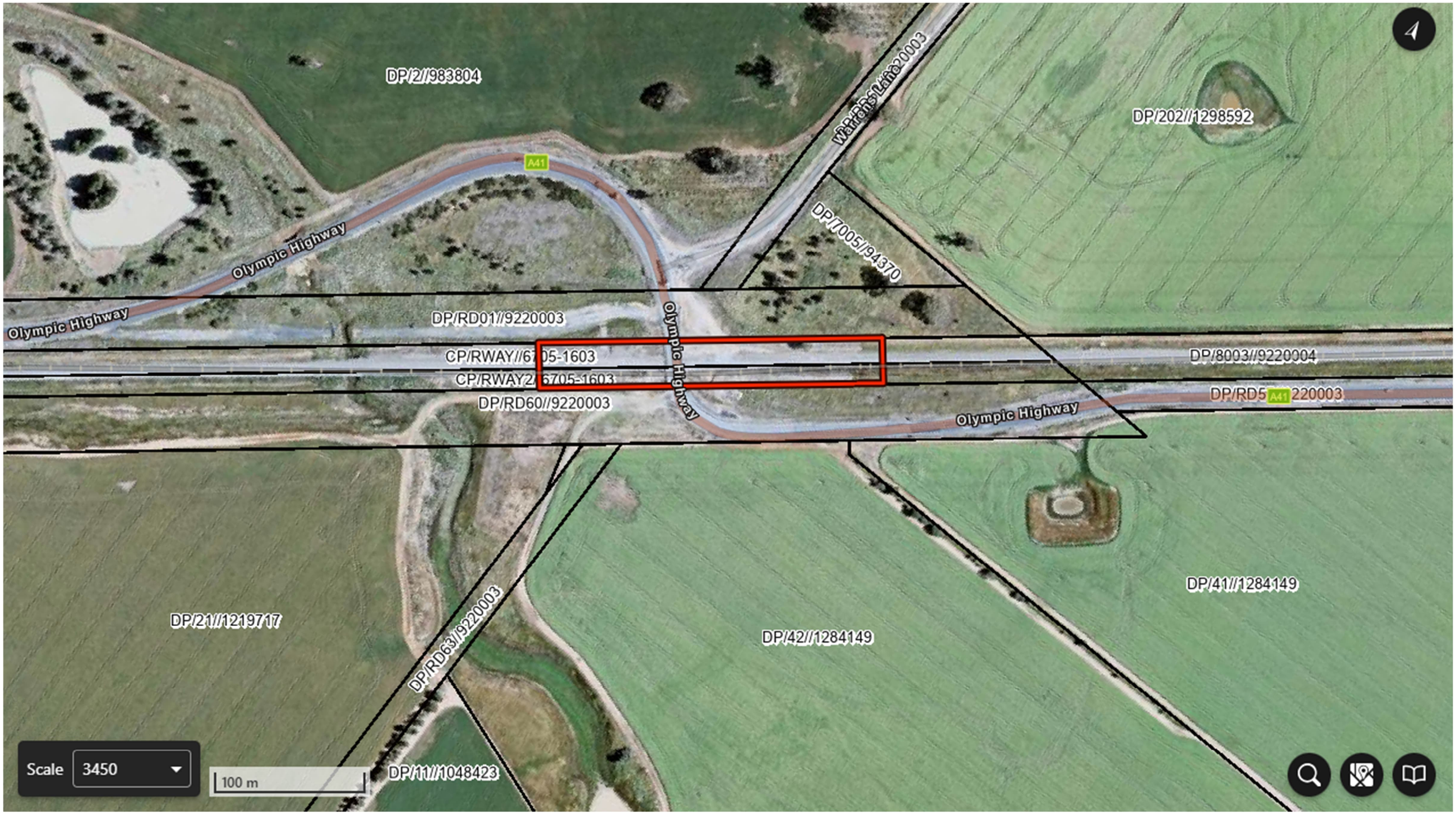
| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 1 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |

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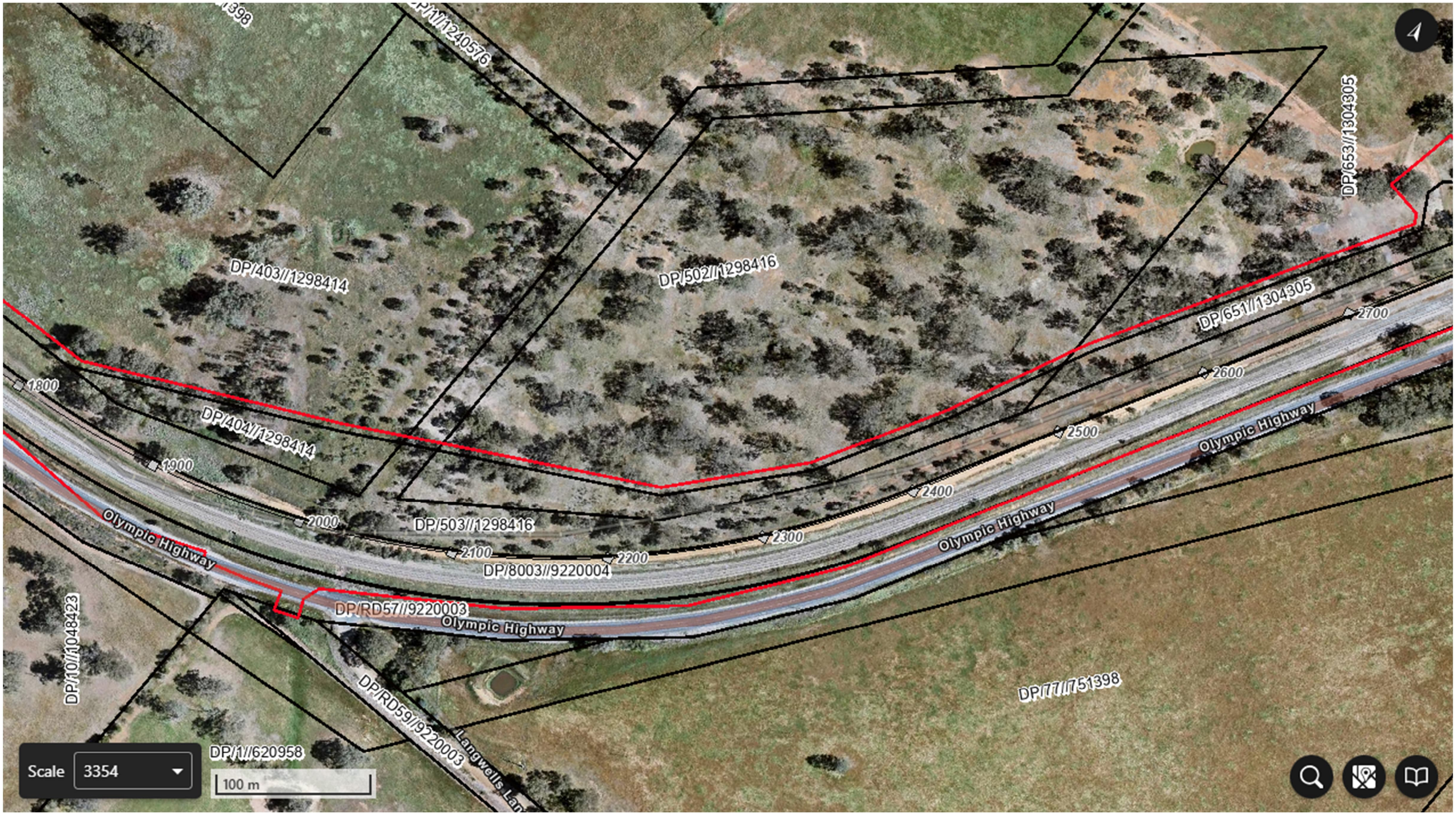


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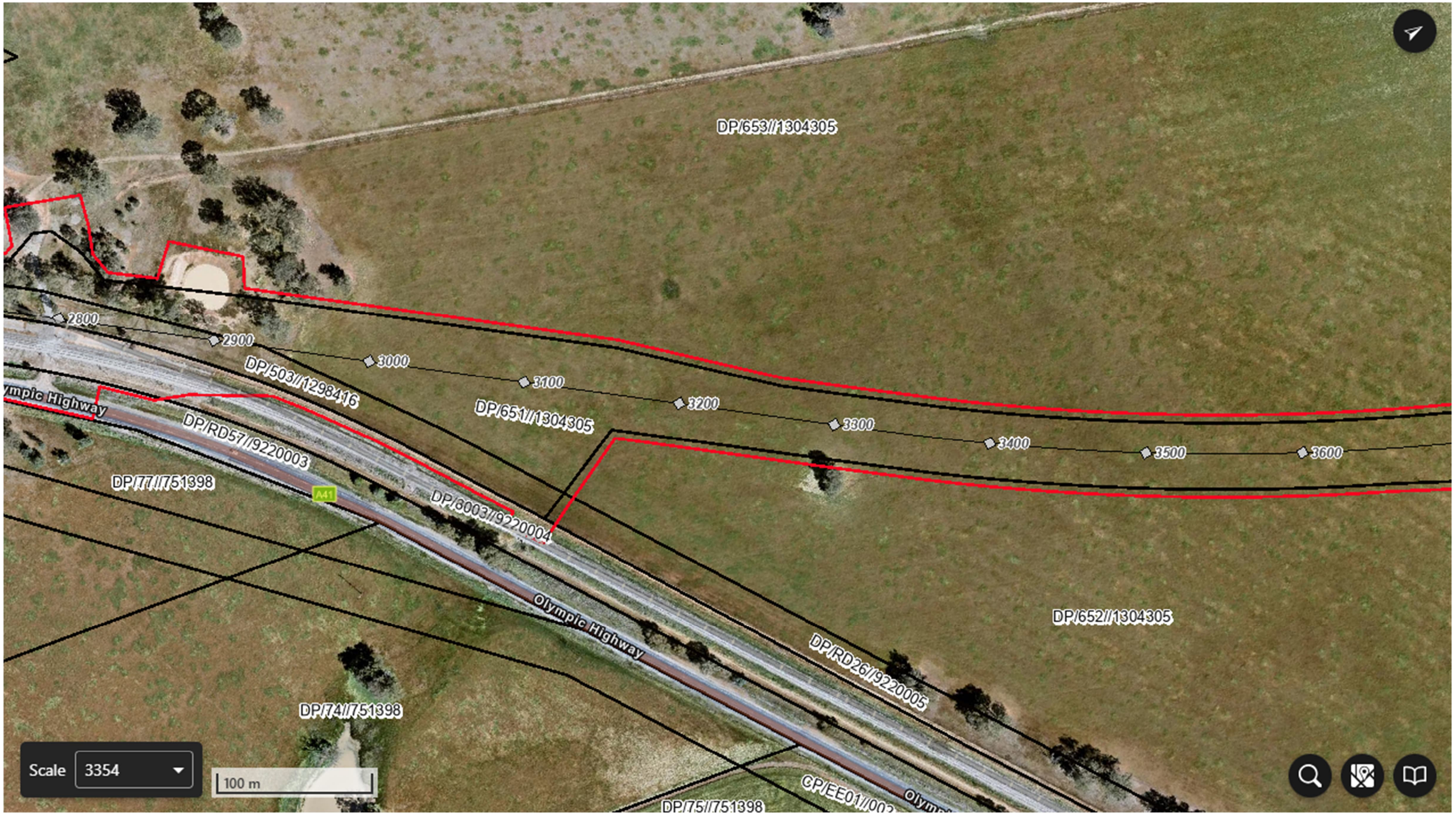


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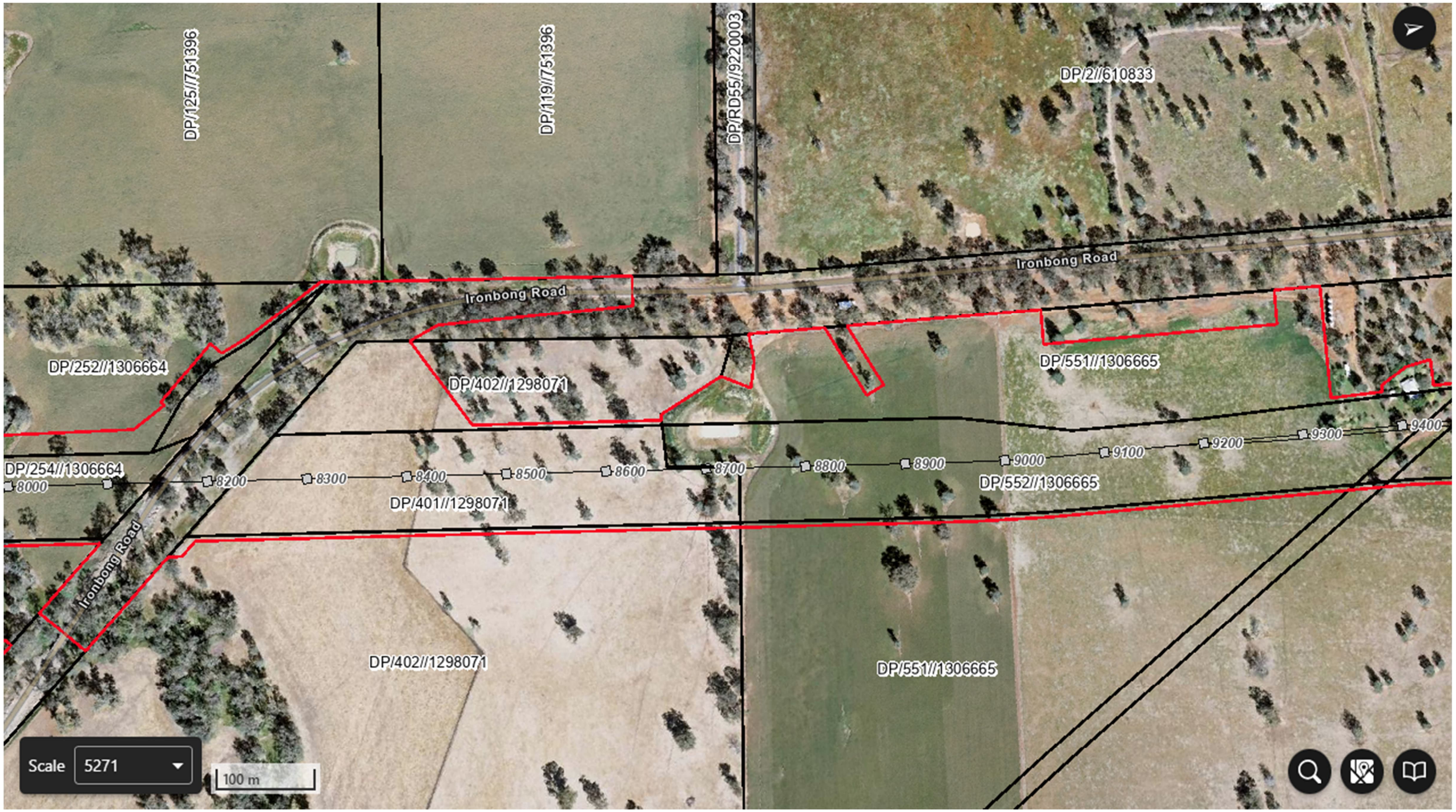


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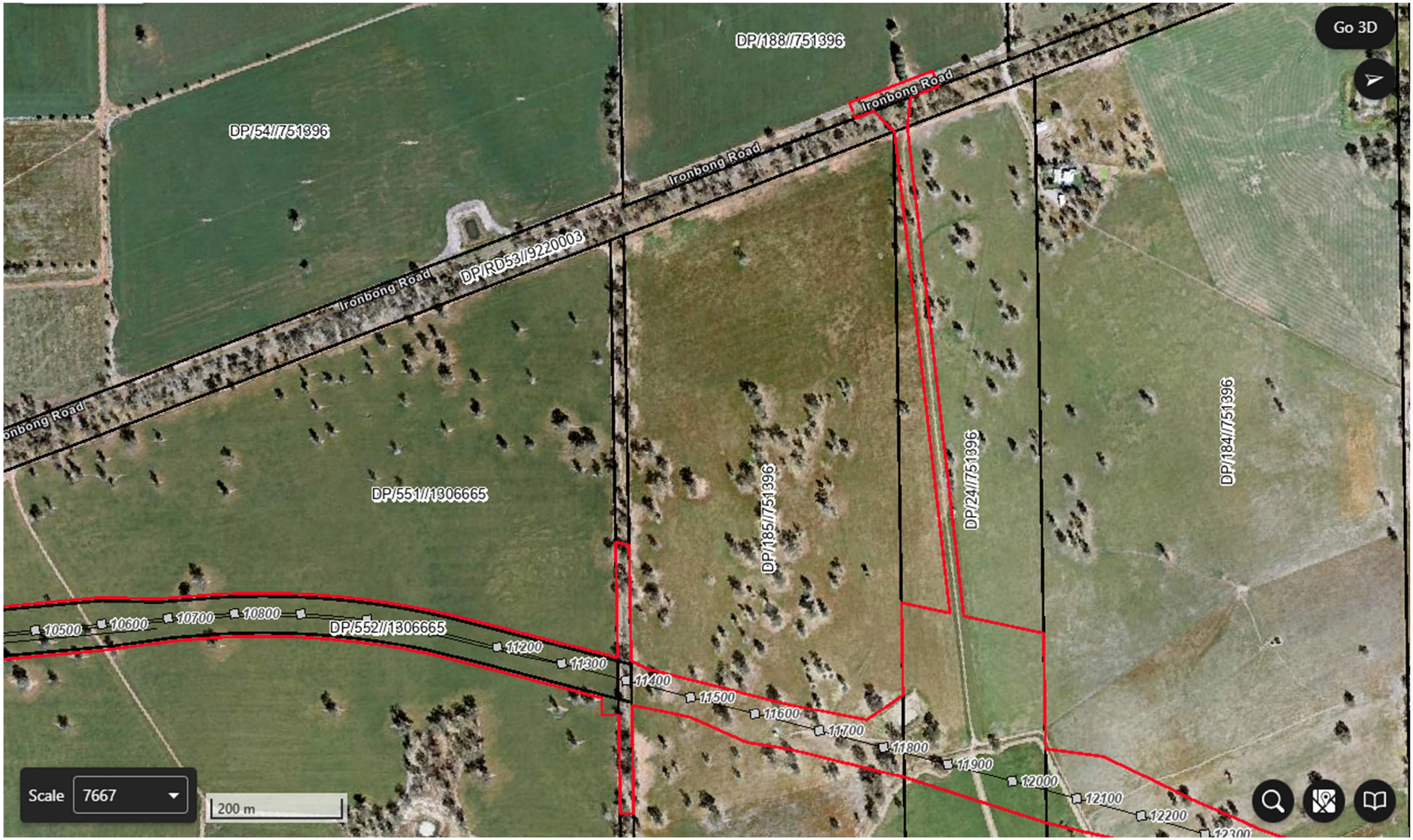


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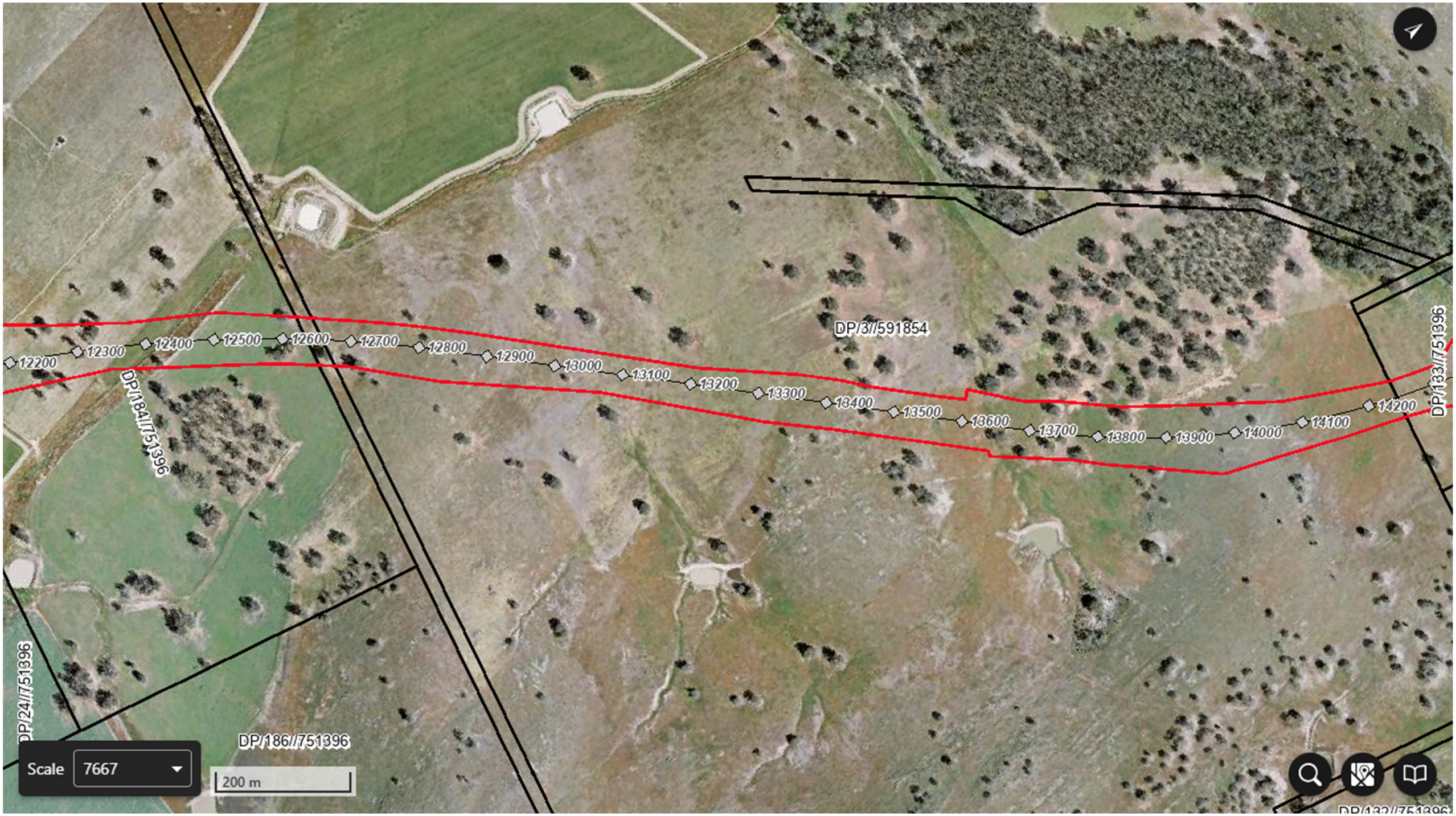


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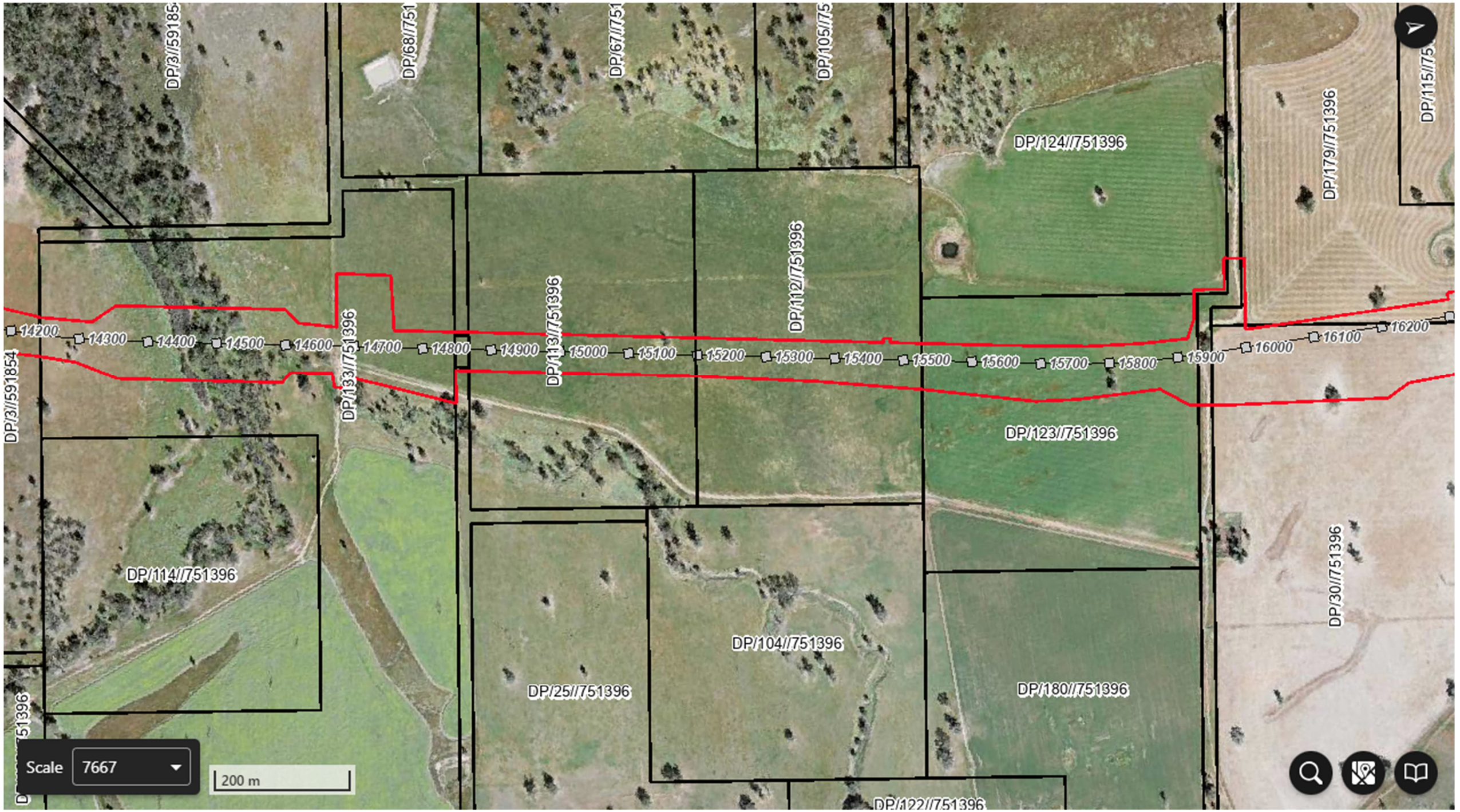


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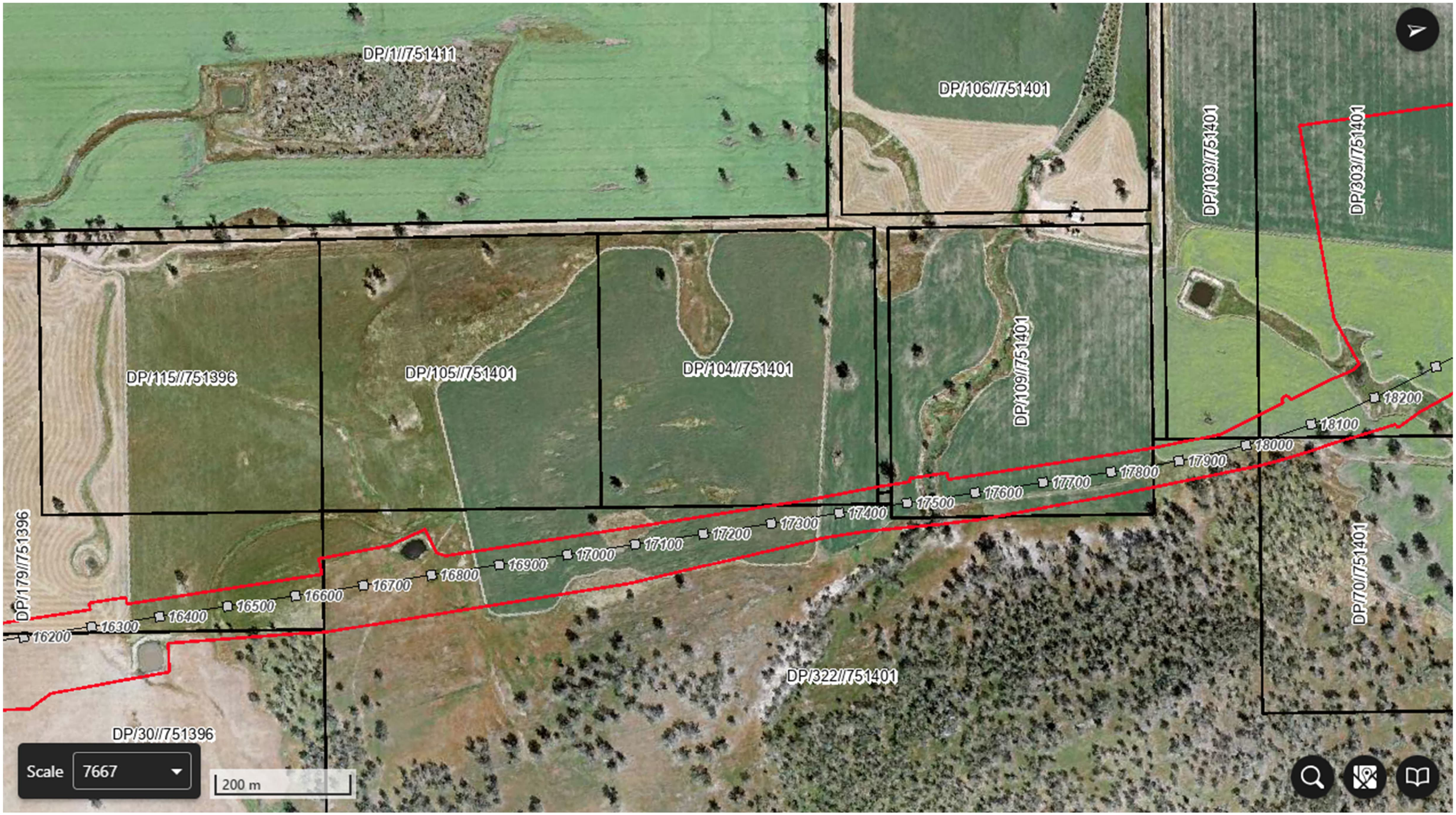


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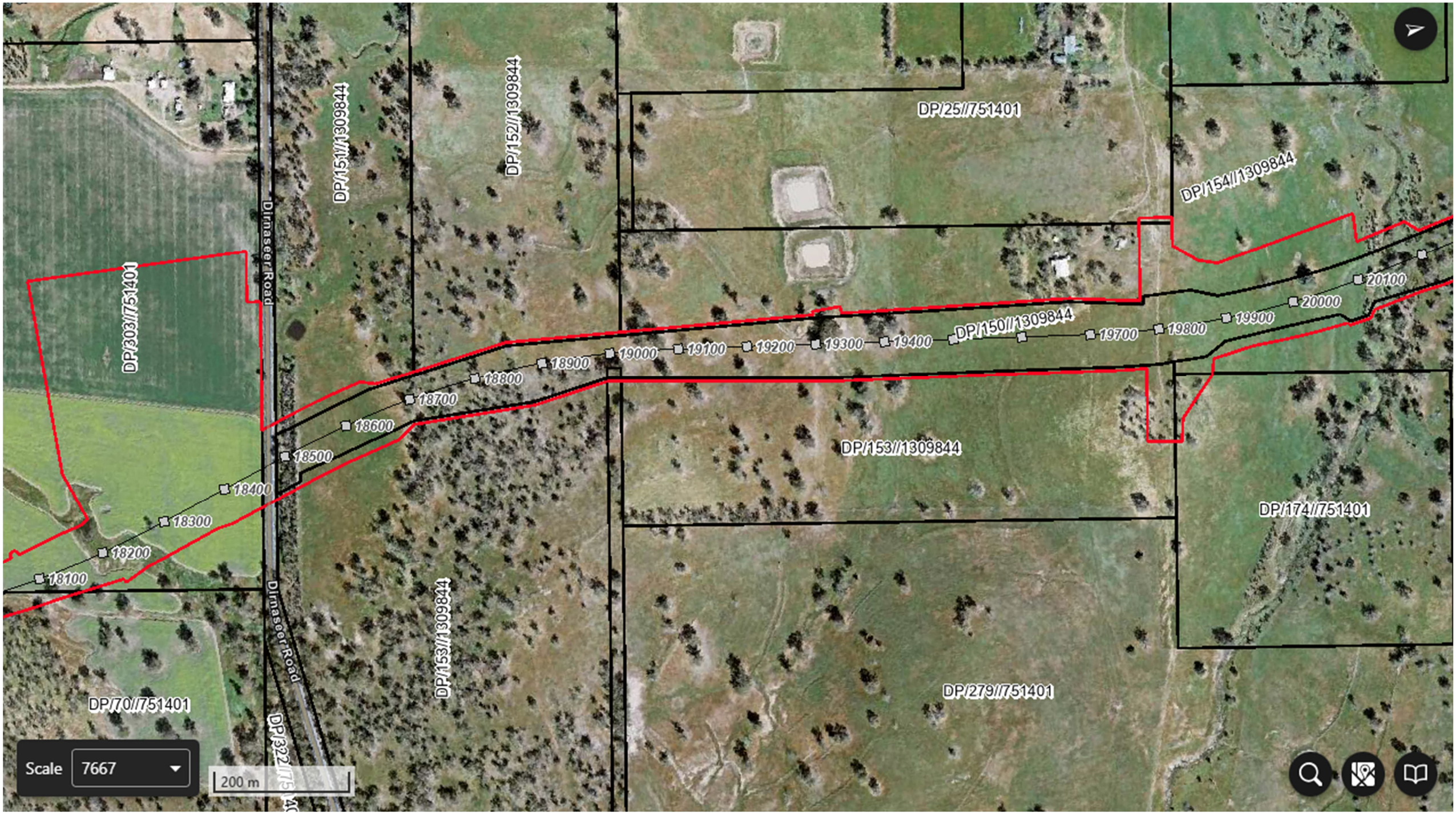
| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 15 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |

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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 16 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 17 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 18 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 19 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 20 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 21 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 22 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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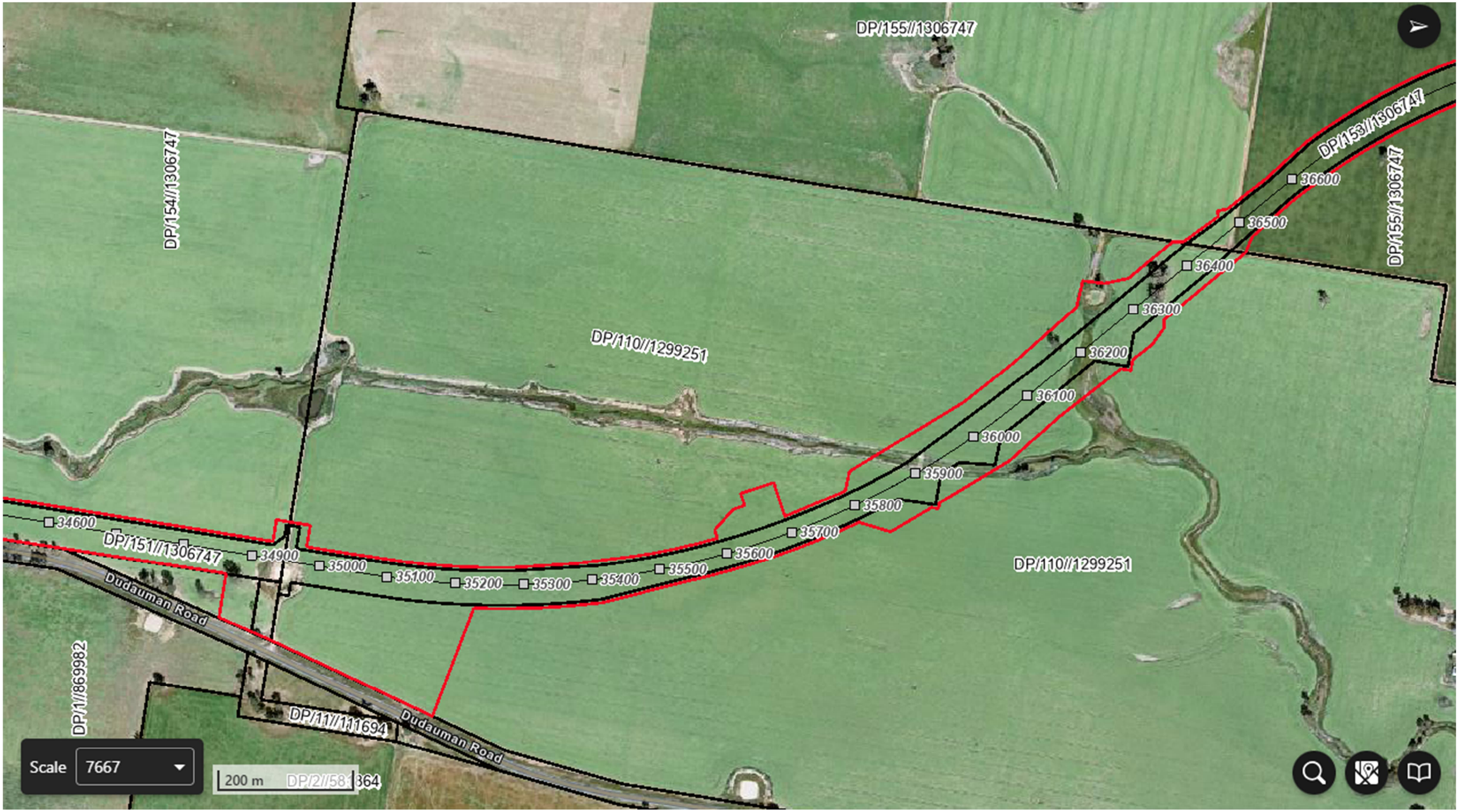
| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 23 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |

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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 24 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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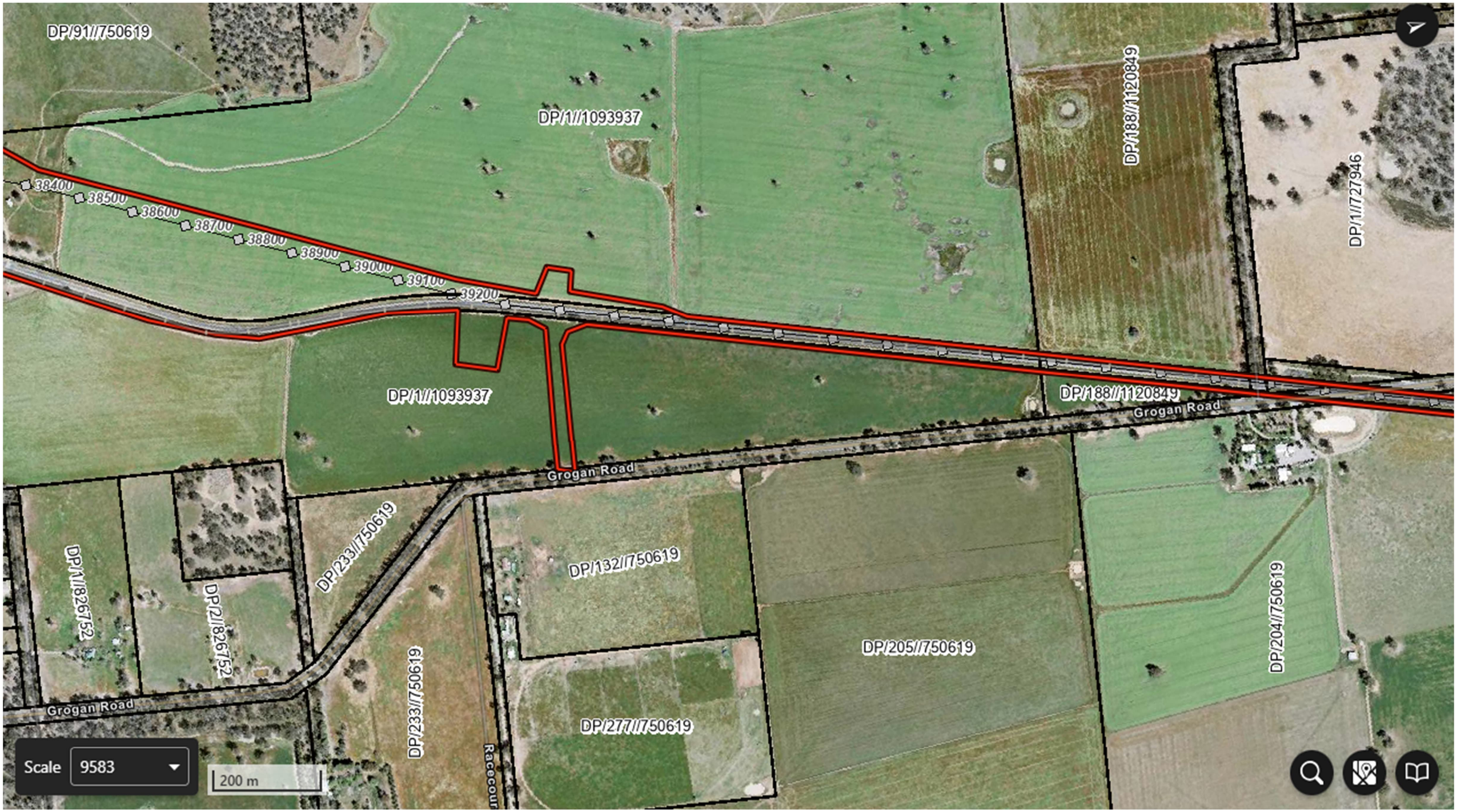
| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 25 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |

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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 26 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |


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| Inland Rail – Illabo to Stockinbingal<br>Premise Boundary Map<br>EPL Number – 22021<br>Revision – 01<br>Sheet 27 of 27 | Drafted: Ryan Maxwell<br>Reviewed: Dan Lidbetter<br>Approved: Andy Robertson<br>Issue date: 11/08/2025 | Legend<br>EPL Premise Boundary<br>Cadastral/Property Boundary<br>Chainage marker |

# 8 Appendix B – Indicative inventory of potential pollutants

This list is an indicative list of potential pollutants. Details of al hazardous/dangerous pollutants stored on site to be managed in Chemwatch . Once ancillary facilities are established and operational, a more thorough list of substances and volumes could be identified.

| Chemicals / hazardous substances | Australian Dangerous Goods Classification | Estimated maximum quantity per worksite |
|---|---|---|
| Acetylene (G size cylinder) | 2.1 | 20 |
| Acid sulfate soils / potential acid sulfate soils | N/A | |
| Agricultural Lime | N/A | 1000kg |
| Ammonium nitrate emulsion (litres) | 5.1 | 4,000 |
| Concrete washout water | N/A | Various |
| Cement | | |
| Curing compounds (litres) | N/A | 600 |
| Diesel (litres) | C1 | 60,000 |
| Dust (from stockpiles, excavations, material handling, etc.) | N/A | N/A |
| Form oil (litres) | N/A | 400 |
| Greases (e.g. plant & equipment grease, mould oils & other greases (kilograms) | N/A | 3000kg |
| Ground conditioner (foaming agent) (kilograms) | N/A | 300KG |
| Grout | | |
| Hydraulic oil (litres) | C2 | 20,000 |
| Oxygen (G size cylinder) | 2.2, 5.1 | 20 |
| Paints and surface coatings (litres) | N/A | 100 |
| Pesticides | | |
| Petrol (litres) | 3 PGII | 500 |
| Sediment laden water | N/A | Various |
| Sodium hydroxide (litres) | 8 | 10,000 |
| Soil stabilisers | N/A | 4,000 |
| Sulphuric acid (litres) | 8 | 26,000 |
| Transformer oils (at HV transformers and kiosks) (litres) | C1 | 75,000 |
| Water treatment chemicals | Various | Various |
| HydraBond HB 4302 (litres) | NA | 10,000 |
| HydraPrime HP 1220/ PAC (litres) | C2 (GHS) | 10,000 |
| Workshop materials (e.g. degreasers, consumables, waste oil for collection or recycling) (litres) | C2 | 6,000 |

# 9 Appendix C – Environmental Risk Register at Time of Issue of this PIRMP

# ENVIRONMENTAL RISK REGISTER

**Project:** Inland Rail - Illabo to Stockinbingal

**Revision:** 1

| Hazard Description | Ranking Matrix | | | Potential Consequence | Mitigation Strategy | Residual Ranking Matrix | | | Comments |
|---|---|---|---|---|---|---|---|---|---|
| | Initial Likelihood | Initial Consequence | Risk Matrix | | | Likelihood | Consequence | Residual Risk | |
| **Approvals** | | | | | | | | | |
| Proposed works not consistent with EIS, CoA or Contract requirements, lacking in an expected aspect | Almost certain | 3 | B | Delays through consistency reviews or modification required | Continual review of works to ensure they are in accordance with the planning approval. Development of consistency assessments, LIWAs, MAFS and Mods where required. | possible | 3 | C | |
| Non-compliance with Environmental Approvals (EIS,CoA) | Almost certain | 4 | A | Breach of Legislation, | Compliance tracking, adequate resourcing, project induction, staff training, auditing, carry out works in accordance with CEMP, measures detailed in plan.<br><br>In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br><br>- Construction Environment Management Plan<br>- Traffic & Transport Access Management Plan (C21).<br>- Noise & Vibration Management Plan (C19).<br>- Contaminated & Hazardous Material Management Plan (SC-7)<br>- Soil & Water Management Plan (C22)<br>- Groundwater Mitigation & Management Plan (GW-4)<br>- Heritage Management Plan (C23)<br>- Biodiversity Management Plan (C20)<br>- Biosecurity Management Plan (C25).<br>- Flood Emergency Management Plan (C24)<br>- Waste Management Plan (WM-2)<br>- Air Quality Management Plan (AQ-1)<br>- Community Consultation Strategy (B1)<br>- Social Impact Management Plan (E109)<br>- Temporary Workforce Accommodation Facility Management Plan (A18)<br>- Bushfire Emergency Plan (E121)<br>- Blast Management Strategy (E10). | unlikely | 4 | C | |
| Non-conformance with CEMP, Failure to follow Sub Plans legislative requirements | likely | 3 | C | delays, fines, prosecutions, environmental harm | CEMP on boarding to be implemented for staff on the Project.<br>Consistency / compliance review of relevant documents that are prepared in timely manner.<br>Develop and implement an efficient and robust audit / inspection plan as part of the CEMP.<br>Use appropriate communication methods (e.g. coordination meetings) to raise CEMP issues from agencies or from internal reviews. | unlikely | 3 | D | |
| Failure to obtain third party approvals | Almost certain | 3 | B | Delay in program | Early identification of and engagement with key stakeholders.<br>Approvals strategy, planning meetings.<br>Utilising GIS information provided as part of the tender process and building on those layers as the design develops. | unlikely | 3 | D | |
| Construction footprint cannot be achieved | possible | 3 | C | Additional approvals required, costs, alternative techniques required. | Construction methodology developed early confirm space checking with plant and equipment. | unlikely | 3 | D | |
| Unable to achieve required design and as-built ISC rating. | likely | 3 | C | Noncompliance with MCoA and Deed | Develop and implement a Sustainability Management Plan.<br>Specialist sustainability contractors identified and engaged early.<br>Develop and implement an efficient and robust audit / inspection plan as part of the SMP. | unlikely | 3 | D | |
| Change of legislative / regulatory requirements | possible | 3 | C | Breach of Legislation, additional approvals, costs | Compile and maintain a legislation register.<br>Identify and review new legislation.<br>Subscribe to EnviroLaw.<br>Compliance tracking, auditing, inspections, training.<br>Change management processes incorporated in the CEMP. | possible | 3 | C | |
| Delay in obtaining project approval | Almost certain | 4 | A | Time and cost | Frequent communication with regulators.<br>Preparation of documents to be ready for submission to DPHI. | possible | 4 | C | |
| **Traffic Transport and Access** | | | | | | | | | |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Changes to intersection and traffic performance due to heavy vehicle movements, narrowing of lanes, speed restrictions and temporary lane closures | likely | 3 | C | Traffic delays, complaints | Develop and implement a Traffic & Transport Access Management Plan (C21) and Community Consultation Strategy (B1).<br><br>Other items include (but not limited to)<br>- Early identification of local roads during construction planning that will be impacted as part of the work.<br>- Prioritise the use of arterial and sub-arterial roads.<br>- Investigate opportunities to minimise impacts to local roads.<br>- Changes will be designed and implemented in consultation with Transport NSW and bus operators, where relevant.<br>- Community notificaitons in advance of changes.<br>- Induction and training.<br>- Temporary and permanent restoration methodologies and timing.<br>- Planning to include consideration of dilapidation approach. | possible | 3 | C | |
| Impacts to road safety as a result of increased road use and turning movements at intersections and construction site access gates. | likely | 3 | C | Safety issues, incidents, traffic delays, complaints | | unlikely | 3 | D | |
| Disruptions and delays to public transport operations, particularly buses | likely | 3 | C | Traffic delays, complaints | | unlikely | 3 | D | |
| Impacts on the availability of on street and off-street parking surrounding construction work areas | likely | 3 | C | Community amenity impacted, public complaints | | possible | 3 | C | |
| Traffic impact to roads utilised by the project due to cummulative impacts from other surrounding projects. | likely | 3 | C | Community amenity impacted, public complaints | | unlikely | 3 | D | |
| Impacts on access to private properties. | likely | 3 | C | Complaints from landowners, impacts to farm operations | | unlikely | 3 | D | |
| Impacts to emergency services through delays in access due to works. | likely | 3 | C | Impacting the ability of emergency services to perform critical tasks | | unlikely | 3 | D | |
| Reduced pedestrian and cyclist access. | unlikely | 3 | D | Reduced accessibility to pedestrians/cyclists, complaints | | unlikely | 3 | D | |
| Impact of construction work on existing rail operations during the tie-in to the north and south ends of the project area. | possible | 2 | D | Traffic/railway delays, complaints, | | unlikely | 3 | D | |
| Realignment of Burley Griffin Way resulting in detours and change to traffic control. | Almost certain | 3 | B | Traffic delays, complaints | | possible | 3 | C | |
| Impacts bus routes and services as a result of increased road use and diversions due to road realignment. | Almost certain | 2 | C | Bus service delays, complaints | | unlikely | 3 | D | |
| Impacts livestock highways as a result of increased construction traffic. | likely | 2 | D | Impacting farm operations | | unlikely | 2 | E | |
| Rural roads unsuitable for construction traffic (e.g., size, land use). | possible | 3 | C | Safety issues, incidents, traffic delays, complaints | | unlikely | 3 | D | |
| Increase in road use as a result of cumulative infrastructure projects in the vicinity proposal. | unlikely | 3 | D | Safety issues, incidents, traffic delays, complaints | | unlikely | 2 | E | |
| Physical impact to roads utilised by the project (dilapidation), including consideration of cummulative impacts from other surrounding projects | Almost certain | 3 | B | Community amenity impacted, public complaints, cost of vehicle damage claims | | possible | 3 | C | |
| **Noise and Vibration** | | | | | | | | | |
| Elevated noise and vibration levels around construction sites, compounds, site accesses and haul routes affects amenity for sensitive receivers | likely | 4 | B | Possible breach in approvals, Community complaints, construction fatigue, property damage. | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br><br>- Environmental Protection Licence under the *Protection of the Environment Operations Ac*t 1997.<br>- Noise & Vibration Management Plan (C19), including Out of Hours Work (OOHW) Protocol and approval process.<br>- Construction Noise & Vibration Impact Statement<br>- Community Consultation Strategy (B1)<br>- Traffic & Transport Access Management Plan (C21)<br>- Blast Management Strategy (E10).<br><br>Other key items include (but not limited to):<br>- Induction,Toolbox and Training<br>- Monitoring, validation and project-specific noise modelling<br>- Specialist consultants<br>- Alternate construction methods (for e.g. shears vs hammering)<br>- Respite periods<br>- Consideration of noise mitigating arrangements, including mats, shielding, hoarding, and site design generally.<br>- Staged construction<br>- Minimise idling, shouting and staff gathering near sensitive area.<br>- Consideration of alternate construction methodologies.<br>- Implementation of exclusion zones.<br>- Project-specific modelling and monitoring.<br>- Building conditions surveys | possible | 3 | C | |
| Noise impacts on sensitive receivers (including residents, employeesand recreation facility users) for work undertaken outside of standard working hours (such as works required to be undertaken under an ROL arrangement) | likely | 4 | B | Community complaints, regulator involvement | | possible | 3 | C | |
| Cumulative noise impacts from other projects | likely | 2 | D | Community complaints, regulator involvement | | possible | 2 | D | |
| Vibration impacts on heritage and other structures causing damage (cosmetic and/or structural) | possible | 4 | C | Property damage, delays, breach of CoA. | | unlikely | 2 | E | |
| Vibration impacts on sensitive equipment | possible | 4 | C | Damage complaints, delays | | unlikely | 3 | D | |
| **Air Quality and Odour** | | | | | | | | | |

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| Impacts on air quality as a result of dust generation during construction (from earthworks, ground disturbance, vegetation removal, exposed soil/stockpiles, excavation and vehicle movements) | likely | 4 | B | community concerns, regulator involvement, fines, impacts flora fauna, pollution | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Air Quality Management Plan (AQ-1)<br>- Contaminated & Hazardous Material Management Plan (SC-7)<br>- Soil & Water Management Plan (C22), including relevant ERSED Plans<br>- Rehabilitation Strategy<br>Complaint management processes (considered in the relevant sub-plans and the CCS)<br>- Sustainability Management Plan<br><br>Other key items include (but not limited to):<br>- Use of water as suppression as required<br>- Minimise exposed surfaces and stage works to minimise disturbed areas.<br>- Restrict dust and odour generating activities in strong wind conditions.<br>- Materials to and from site to be covered.<br>- Stockpile sites chosen as far as reasonably practical from sensitive receivers.<br>- Stabilised Access tracks local roads.<br>- Engagement with relevant stakeholders (LGAs and EPA).<br>- Construction staging and temporary work plans<br>- Induction and training<br>- Plant pre acceptance and maintenance records (as plant are floated to site); and daily pre-start checks (as plant are operated day-to-day).<br>- Appropriate storage and management of chemicals. | unlikely | 4 | C | |
| Odours/emissions from disturbance of contaminated soils or other sources such as asphalt laying during road modification works | unlikely | 3 | D | community concerns, regulator involvement, fines, impacts flora fauna, pollution | | unlikely | 2 | E | |
| Fugitive emissions (e.g. VOCs) from fuel/chemicals storage and handling | possible | 2 | D | community concerns, regulator involvement, fines, impacts flora fauna, pollution | | unlikely | 2 | E | |
| Impacts on air quality as a result of emissions from vehicles or plant during construction | likely | 2 | D | community concerns, pollution | | unlikely | 2 | E | |
| **Contamination** | | | | | | | | | |
| Potential to disturb contaminated soils during construction and mobilise contamination. | possible | 3 | C | Exposure of contamination, spread of contaminated substances/materials, human exposure, ecological exposure | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Soil & Water Management Plan (C22)<br>- Surface Water Monitoring Program<br>- Groundwater Monitoring Program<br>- Remediation Action Plan<br>- Contaminated & Hazardous Material Management Plan (SC-7)<br>- Emergency Response Plan (inclusive of emergency spill response)<br>- Unexpected and Incidental Finds Protocol for contamination<br><br>Other key items include (but not limited to):<br>- Permits and Licencing<br>- Removal off-site as a waste to a licensed waste facility.<br>- Specialist Contractor(s) including CPESC and contamination consultant<br>- Fuel tanks and associated pipe work to be located within bunds with 110% capacity.<br>- Spill kits to be made available on site to prevent material entering the watercourse or surface water drains.<br>- Tanks, bunds, plant and machinery to be regularly maintained.<br>- Training key personnel in emergency spill response.<br>- Daily prestart inspection for all hydraulic plant.<br>- Appropriate storage and management of chemicals.<br>- Refuelling and wash-down in designated areas only.<br>- Approved design<br>- ERSED Plans<br>- Training toolbox and induction<br>- Materials Tracking Register<br>- Unexpected Finds Procedure for contamination<br>- Waste classification and disposal at appropriately licensed facilities. | unlikely | 3 | D | |
| Potential to disturb hazardous materials during the demolition of buildings and structures. | possible | 3 | C | Exposure of contamination, spread of contaminated substances/materials, human exposure, ecological exposure | | unlikely | 3 | D | |
| Potential for direct contact exposure by construction workers to soils associated with dumped materials and stockpiles or machine storage and maintenance. | possible | 3 | C | Exposure of contamination, spread of contaminated substances/materials, human exposure, ecological exposure | | unlikely | 3 | D | |
| Accidental discharge of potentially contaminated groundwater | possible | 3 | C | Pollution, breach of legislation, fines | | unlikely | 3 | D | |
| Exposure/ Mistreatment of Acid Sulfate Soils causing pollution or impacting construction in ground | possible | 3 | C | Pollution, breach of legislation, fines | | unlikely | 3 | D | |
| Contamination of soils and groundwater due to spills or leaks of fuels, oil or other hazardous substances | possible | 3 | C | Pollution, soil contamination, breach of legislation, fines | | unlikely | 3 | D | |
| Contaminated stockpile storage and containment inadequate in space or build | likely | 3 | C | Pollution, breach of legislation, fines, costs due to added disposal/management of material | | unlikely | 3 | D | |
| Not recognising/ improperly treating unexpected finds | Almost certain | 3 | B | Pollution, breach improperly legislation, fines, incorrect waste disposal, potential cross contamination of stockpiles. | | unlikely | 3 | D | |
| Incorrect classification of waste | Almost certain | 3 | B | Pollution, breach of legislation, fines | | unlikely | 4 | C | |
| Incorrect disposal of waste | Almost certain | 3 | B | Pollution, breach of legislation, fines | | unlikely | 4 | C | |
| **Water Quality** | | | | | | | | | |
| Sedimentation of local and downstream watercourses and water bodies | likely | 3 | C | Pollution of surface water/groundwater, ecological impacts, impacts to waterways users (farmers), breach of legislation, fines | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Soil & Water Management Plan (C22)<br>- Surface Water Monitoring Program<br>- Groundwater Mitigation & Management Plan (GW-4)<br>- Groundwater monitoring program<br>- Acid Sulfate Soil Management Plan<br>- Remediation Action Plan<br>- SEP / ERSED plans<br><br>Other key items include (but not limited to):<br>- Installation and maintenance of ERSED controls.<br>- Construction planning and methodology | unlikely | 3 | D | |
| Impacts to water quality due to disturbance of actual or potential acid sulphate soils | possible | 4 | C | | | unlikely | 4 | C | |
| Increased alkalinity and pH of watercourses due to runoff from concrete batching plant operations. | unlikely | 4 | C | | | unlikely | 3 | D | |
| Litter from construction activities polluting downstream watercourses. | unlikely | 3 | D | | | unlikely | 2 | E | |

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|---|---|---|---|---|---|---|---|---|---|
| Contamination of groundwater from construction activities. | possible | 4 | C | | - Develop and implement Erosion and Sediment Control Plans (ESCPs) prior to works commencing.<br>- Delineate areas to be retained or cleared.<br>- Stabilise exposed areas and stockpiles.<br>- Diversion of water to sediment basins (where applicable).<br>- Treat and test basins prior to discharge.<br>- Compliance with water discharge criteria from WPIA<br>- Management of groundwater<br>- Spill Kits / training<br>- Plant Pre-Acceptance Maintenance Records<br>- Daily pre-starts on plant/equipment to be used. | unlikely | 3 | D | |
| Impacts on surface water from spills or leaks from construction plant and equipment. | Almost certain | 2 | C | | | likely | 2 | D | |
| **Hydrology and Flooding** | | | | | | | | | |
| Impairment or modification of existing drainage infrastructure | likely | 3 | C | Change in overland flow paths and flood regimes, excacerbation of flooding impacts caused by construction, reduction in floodplain storage, impacted water quality, flooding impacts to properties and construction sites, safety impacts to workers/community. | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Soil & Water Management Plan (C22)<br>- Groundwater Mitigation & Management Plan (GW-4)<br>- Flood Emergency Management Plan (C24)<br><br>Other key items include (but not limited to):<br>- Hydrologic and hydraulic assessment (and/or review existing assessments undertaken)<br>- Consultation with relevant councils re drainage designs and systems.<br>- Management of water flow/diversions through temporary works designs and in consultation with CPESC.<br>- Implementation of ERSED plans to minimise sedimentation in waterways/drains.<br>- Implementation of Working in Waterways Procedure (in SWMP). | unlikely | 3 | D | |
| Temporary impact to the behaviour of local surface water systems during construction due to the presence of construction features, including erosion and sedimentation control structures. | possible | 3 | C | | | unlikely | 3 | D | |
| Changes to flow patterns and altered hydrology due to construction in watercourses. | possible | 3 | C | | | unlikely | 3 | D | |
| Impact of flooding on unprotected areas during construction resulting in washouts or erosion. | possible | 3 | C | | | unlikely | 3 | D | |
| Sedimentation and changes to geomorphology in watercourses. | possible | 3 | C | | | unlikely | 3 | D | |
| Changes to impervious areas and/or the catchment area of existing drainage infrastructure, | Almost certain | 2 | C | | | unlikely | 2 | E | |
| **Groundwater** | | | | | | | | | |
| Extraction of groundwater may cause drawdown of the groundwater table, impacting sub-surface flows and water availability. | possible | 4 | C | Nearby ground formation and structures potentially impacted. Ecological impacts to due change in subflow. Impacts to other users who rely on the aquifer e.g. farmers for groundwater bores | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Soil & Water Management Plan (C22)<br>- Groundwater Mitigation & Management Plan (GW-4)<br>- Groundwater monitoring program<br>- Earthworks/civil design considerations<br>- Biodiversity Management Plan (C20)<br><br>Other key items include (but not limited to):<br>- Ensuring design appropriately considers groundwater interactions to mininise impacts as much as possible<br>- Licencing and Permit processes<br>- Modelling (and/or review of existing modelling undertaken as part of the EIS).<br>- Monitoring removal quanitities to ensure aquifer is not significantly impacted, including farmers which rely on the aquifer for a water source.<br>- Ecological monitoring for GDEs as required | unlikely | 3 | D | |
| Potential for bulk excavations to intersect the water table and lead to groundwater level drawdown, impacting nearby groundwater bores, groundwater dependent ecosystems, and watercourse base flow. | possible | 3 | C | | | unlikely | 3 | D | |
| Changes to soil moisture content causing compression or settlement. | possible | 4 | C | | | unlikely | 3 | D | |
| Degradation of water quality through the movement of potentially existing contamination plumes within the groundwater environment. | rare/remote | 3 | D | | | unlikely | 2 | E | |
| **Non-Aboriginal heritage** | | | | | | | | | |
| Potential direct impacts on heritage listed sites located within the proposal site and any potential heritage items located within/near the proposal site. | likely | 4 | B | Delays in approval to recommence. Additional measures, archaeological salvage, DPHI approvals, irreversible damage, prosecutions, infringements, permanent damage/harm to heritage items, damage to property, complaints, | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Heritage Management Plan (C23)<br>- Noise & Vibration Management Plan (C19).<br>- Unexpected and Incidental Finds Protocol<br><br>Other key items include (but not limited to):<br>- Physical delineation, including fencing / barriers<br>- Training and awareness, including induction (and specifically content for artefact find).<br>- Specialist consultant<br>- Sympathetic design<br>- Sensitive Area Plans to include heritage sites and briefed to site teams.<br>- Unexpected and Incidental Finds Protocol to be followed should potential Heritage items be uncovered.<br>- Heritage licenses/permits as required.<br>- Vibration monitoring<br>- Avoiding vibration intensive works with MWDs of heritage structures, uncless further assessment/approvals have been obtained.<br>- Further assessment of items with potential heritage significance. | unlikely | 3 | D | |
| Disturbance of known or unidentified items or places of non-Aboriginal heritage significance. | possible | 4 | C | | | unlikely | 3 | D | |
| Impacts to heritage items from vibration during construction. | possible | 4 | C | | | unlikely | 3 | D | |
| Design that detracts from the heritage significance of nearby items. | unlikely | 3 | D | | | unlikely | 2 | E | |
| Impacts on listed heritage items or items of heritage values due to demolition, altered historic arrangements and access, visual amenity, landscape and vistas, curtilage, subsidence and architectural noise treatment. | unlikely | 3 | D | | | unlikely | 2 | E | |

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|---|---|---|---|---|---|---|---|---|---|
| **Aboriginal heritage** | | | | | | | | | |
| Potential impacts on registered Aboriginal heritage items/sites in the proposal site. | likely | 4 | B | Prosecutions, infringements, permanent damage/harm to heritage items, delays in approval to recommence, additional archaeological salvage/assessments, approvals | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Heritage Management Plan (C23)<br>- Archaeological excavations and salvage and assocaited plans/reports<br>- Aboriginal Cultural Values Plan<br>- Unexpected and Incidental Finds Protocol<br><br>Other key items include (but not limited to):<br>- Physical delineation, including fencing / barriers, no-go/exclusion zones<br>- Training and awareness, including inductions.<br>- Detailed design to consider avoiding areas as identified.<br>- Stakeholder consultation, including with RAPs<br>- Heritage licenses/permits as required. | unlikely | 3 | D | |
| Impacts on unrecorded Aboriginal sites and/or areas of archaeological sensitivity or cultural value. | possible | 4 | C | | | possible | 2 | D | |
| Impacts on areas predicted to have moderate to high archaeological potential. | possible | 4 | C | | | possible | 2 | D | |
| Indirect impacts on registered Aboriginal sites outside the proposal site by the movement of vehicles and/or construction machinery. | possible | 3 | C | | | possible | 2 | D | |
| Indirect impacts to Aboriginal heritage items from construction of the project such as visual setting or settlement. | possible | 2 | D | | | unlikely | 2 | E | |
| **Biodiversity** | | | | | | | | | |
| Clearing of native vegetation resulting in loss of fauna habitat, habitat fragmentation and loss of connectivity. | likely | 4 | B | Prosecutions, fines, damage to flora communities and habitat for fauna, physical loss of fauna species, unnapproved clearing, exceedance of clearing limits, fauna mortality/injury, rework, delays, failed rehabilitation | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br><br>- Biodiversity Management Plan (C20), inclusive of the clearing procedure, fauna rescue and release procedure, working within and adjacent to waterways procedure, farm dam dewatering procedure.<br>- Biosecurity Management Plan (C25).<br>- Rehabilitation Strategy<br>- Box Gum Woodland Restoration Plan<br>- Confirmation of Biodiversity Impacts of Unsurveyed Land Report<br>- Soil & Water Management Plan (C22)<br>- Groundwater Mitigation & Management Plan (GW-4)<br>- Unexpected and Incidental Finds Protocol<br><br>Other key items include (but not limited to):<br>- Delineation and Fencing - TPZ's<br>- Training and awareness, including induction<br>- Replant native vegetation as soon as possible<br>- Reuse of vegetation as mulch<br>- Management of weeds, pests and pathogens inclduing vehicle/equipment hygiene<br>- Pre-clearing surveys to be undertaken by an ecologist<br>- Habitat areas to be protected to be clearly demarcated as no go zones with fencing<br>- Clearing flagging to be maintained through to works completion<br>- Sensitive Area Plans and Environmental Work Method Statements to be briefed to site staff highlighting protected areas, clearing limits, habitat trees etc.<br>- Ensure no disturbance to TEC (including in unsurveyed land) occurs prior to relevant approvals/clearances have been obtained.<br>- Clearing permits to be issued prior to any clearing activity.<br>- Minimise vegetation clearance<br>- Clearing flagging to be maintained through to works completion<br>- Use of ecologists throughout the Project for guidance and advice<br>- Stop works where unexpected threatened species or fauna interactions occur.<br>- Implement appropriate ERSED controls to minimse impacts to waterways and aquatic fauna/flora<br>Ensure dewatering is undertaken in accoranc ewith the relevant procedures to ensure water quality is appropriate and does not impact aquatic fauna.<br>- Clearing to be tracked to ensure limits are not exceeded | possible | 3 | C | |
| Clearing greater than design allowances (although still approved project boundaries) Impacts to native vegetation from earthworks and clearing | possible | 4 | C | | | possible | 2 | D | |
| Direct impacts on listed threatened flora species and endangered terrestrial ecological populations and communities. | likely | 4 | B | | | possible | 3 | C | |
| Impacts on potential habitat for listed threatened fauna species. | likely | 4 | B | | | possible | 3 | C | |
| Increased impacts from pest plants and animals during construction from movement of vehicles, machinery and materials in and out of site. | possible | 4 | C | | | possible | 2 | D | |
| Indirect impacts on fauna species due to increased dust, sedimentation, and erosion, noise, light and contamination pollution. | possible | 4 | C | | | possible | 2 | D | |
| Native fauna mortality from vehicle strikes and during clearing | likely | 3 | C | | | possible | 2 | D | |
| Fauna Interaction | possible | 4 | C | | | possible | 2 | D | |
| Potential impacts on groundwater dependent ecosystems. | possible | 3 | C | | | possible | 2 | D | |
| Potential impacts on aquatic ecology and threatened species, including as a result of removal of riparian vegetation and fish passage blockages during construction of waterway crossings. | likely | 4 | B | | | possible | 3 | C | |
| Water quality impacts and changes to flow regimes, including through the removal of farm dams, affect aquatic ecosystems. | likely | 3 | C | | | possible | 2 | D | |
| Potential impacts on protected and sensitive lands. | likely | 3 | C | | | possible | 2 | D | |
| Unsuccessful rehabilitation of works | likely | 3 | C | | | rare/remote | 3 | D | |
| **Soils landform and geology** | | | | | | | | | |
| Erosion as a result of the disturbance of soils during construction, particularly in soil landscapes characterised by dispersive soils, given their susceptibility to erosion. | possible | 2 | D | Loss of soil, degredation of soil, sedimentation in waterways/drains, fines/regulatory action, delays/rework, unstable landforms | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Soil & Water Management Plan (C22)<br>- Contaminated & Hazardous Material Management Plan (SC-7)<br>- Geotechnical and DSI reports and excavation permits.<br>- Waste Management Plan (WM-2)<br>- SEPs/ERSED plans | possible | 1 | E | |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Disturbance of soils and subsequent loss or degradation of soil quality during earthworks at construction compound site. | possible | 2 | D | | | possible | 1 | E | |
| Disturbance of landforms during earthworks reducing the stability of landforms. | possible | 3 | C | | | possible | 2 | D | |
| **Resource and Waste** | | | | | | | | | |
| Generation of excess spoil that cannot be reused onsite (unsuitable for reuse or insufficient space) and needs to be disposed of. | possible | 3 | C | Cost, loss of reuse potential and impact to sustainability outcomes for the project (ISC rating), additional resource consumption, regulatory breaches/action, pollution, illegal disposal | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Contaminated & Hazardous Material Management Plan (SC-7)<br>- Waste Management Plan (WM-2)<br>- Sustainability Management Plan<br>- Soil & Water Management Plan (C22)<br>- Biodiversity Management Plan (C20)<br><br>Other key items include (but not limited to):<br>- Maximise reuse/recycle of waste<br>- Consider use of recycled materials in construction process such as recycled concrete.<br>- Maximise reuse of waste on site and minimise waste to landfill<br>- Ensure all waste is considered and tabulated in a waste register and segregate waste wherever possible and removed to licensed waste contractor.<br>- Use licensed contractors to remove waste and investigate options for onsite reuse and recycling e.g. use of vegetation as mulch, reuse of spoil.<br>- Undertake site inspections to ensure that waste is disposed into correct skips and inspections of waste carriers to ensure that they are following their duty of care.<br>- Waste to leave site to a facility licensed to accept it only or with an approved Section 143 notice.<br>- Waste classification to occur and disposal at appropriately licensed waste facilities. | possible | 2 | D | |
| Inappropriate management of waste generated during construction, resulting in environmental, health and amenity impacts, including contamination, water quality impacts, odour and dust. | possible | 2 | D | | | possible | 1 | E | |
| Inappropriate management of waste generated during construction, resulting in excessive waste being directed to landfill. | possible | 3 | C | | | possible | 2 | D | |
| Increased resource consumption. | possible | 2 | D | | | possible | 1 | E | |
| **Sustainability, including Climate change and GHG** | | | | | | | | | |
| Hazard, potential consequences and mitigation strategies related to the Sustainability discipline, including climate change and greenhouse gas emissions, are detailed in a separate risk register. | | | | | | | | | |
| **Land Use** | | | | | | | | | |
| Effects on access to and within properties as a result of changes to private access roads and internal access arrangements. | Almost certain | 4 | A | Community complaints, unnapproved access to private property, impacting farm operations/access, impacting railway line operations | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br>- Noise & Vibration Management Plan (C19)<br>- Biosecurity Management Plan<br>- Community Consultation Strategy (B1)<br>- Air Quality Management Plan (AQ-1)<br>- Traffic & Transport Access Management Plan (C21).<br>- Individual Property Plan | possible | 3 | C | |
| Indirect impacts on agricultural land use/production and livestock from construction activities, including impacts from changes to access, noise, and air pollution. | likely | 2 | D | | | unlikely | 2 | E | |
| Temporary changes to land use as a result of the proposal's land requirements during construction—temporary leasing of additional areas outside the operational footprint to facilitate construction negatively affects the availability of land for other uses. | Almost certain | 3 | B | | | possible | 3 | C | |
| The movement of construction machinery and materials introduces biosecurity risks, including the spread of weeds. | possible | 3 | C | | | possible | 2 | D | |
| Effects on access to and along travelling stock reserves. | possible | 2 | D | | | unlikely | 2 | E | |
| Effects on mining leases and licences, such that viability is affected. | unlikely | 2 | E | | | unlikely | 2 | E | |
| Impacts on agricultural land use from construction activities including impacts from reduced access, noise, and air pollution. | likely | 2 | D | | | unlikely | 2 | E | |
| Impacts on land use as a result of property acquisition. | likely | 3 | C | | | possible | 2 | D | |
| Impacts on other infrastructure during construction including utilities and existing rail lines. | possible | 2 | D | | | unlikely | 2 | E | |
| **Socio-Economic** | | | | | | | | | |
| Potential constraint in local short-term accommodation market (during site visits by ARTC-managed technical specialists), restricting access for other community needs. | possible | 3 | C | | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include: | likely | 2 | D | |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Restriction on people's ability to move around their community as a result of traffic restrictions and delays at level crossings. | likely | 2 | D | Community complaints, unnapproved access to private property, impacting farm operations/access, impacting railway line operations, impacts to the community, increased pressure on resources in adjacent towns, increased traffic on local roads, antisocial behaviour. | '-Social Impact Management Plan (E109)<br>- Noise & Vibration Management Plan (C19)<br>- Temporary Workforce Accommodation Facility Management Plan (A18)<br>- Community Consultation Strategy (B1)<br>- Air Quality Management Plan (AQ-1)<br>- Traffic & Transport Access Management Plan (C21). | unlikely | 2 | E | |
| Decreased perceptions of safety resulting from anti-social behaviour in local townships due to temporary construction workforce. | possible | 3 | C | | | likely | 2 | D | |
| Restricted access to community services and facilities due to increased demand from the construction workforce. | possible | 4 | C | | | likely | 2 | D | |
| Impeded access across the rail corridor for emergency services, specifically during times of high bushfire risk. | possible | 4 | C | | | likely | 2 | D | |
| Stress and anxiety resulting from potential harm to identified sites of Aboriginal cultural heritage around the proposal site. | unlikely | 5 | B | | | possible | 3 | C | |
| Adverse changes to community cohesion and perception of safety in relation to anti-social behaviour exhibited by temporary construction workforce. | possible | 3 | C | | | likely | 2 | D | |
| Adverse mental health impacts predominantly for directly affected landowners as a result of the land access and acquisition process of negotiations over a long period of time. | possible | 4 | C | | | likely | 2 | D | |
| Adverse mental health impacts (frustration, impatience) and cessation engagement with ARTC due to protracted design planning process. | possible | 4 | C | | | likely | 2 | D | |
| Changes to rural amenity character, which may affect people's sense of place, including adverse changes to existing visual amenity for three residential sensitive receivers in the local study area. | likely | 3 | C | | | likely | 2 | D | |
| **Visual Amenity** | | | | | | | | | |
| Light impacts from out-of-hours work during construction. | possible | 2 | D | Community complaints, loss of visual amenity in the area | In accordance with the Conditions of Approval, the Project will limplement the following management plans that will manage risk associated with these risks and hazards during construction. These plans include:<br><br>'-Social Impact Management Plan (E109)<br>- Noise & Vibration Management Plan (C19)<br>- Temporary Workforce Accommodation Facility Management Plan (A18) | unlikely | 2 | E | |
| Temporary visual impacts on sensitive visual receivers in the vicinity of construction work and from areas with views of the proposal site. | possible | 2 | D | | | unlikely | 2 | E | |
| Adverse impacts on landscape character during construction, particularly in greenfield areas. | possible | 2 | D | | | unlikely | 2 | E | |
| **Health and Safety** | | | | | | | | | |
| Refer to the Project Workplace Risk Assessment (WRA) for health and safety risks and mitigation. | | | | | | | | | |

# JHG PROJECT RATING MATRIX

JH-APP-RCC-003-02
Project Risk and Opportunity Rating Matrix

| CONSEQUENCE - RISK | | | | | |
|---|---|---|---|---|---|
| **RATING** | **1** | **2** | **3** | **4** | **5** |
| **Workplace Health and Safety** | * First aid injury, and/or<br>* Minor safe working issues | * Medical treatment, and/or<br>* Moderate safe working breach likely to impact on operations | * Serious medical / hospital treatment resulting in need alternate working or resulting in lost time injury, and/or<br>* Significant safe working breach with actual impact on operations | * Serious or permanent Injury, and/or<br>* Significant safe working beach with immediate impact on operations on one or more worksites | * 1 or more fatalities, and/or<br>* Major breach of safe working with immediate and extensive impact on one or more worksites |
| **Budget ($AUD)** | <$<enter> **(<1%)** over project budget | $<enter> to $<enter> **(1% to 5%)** over project budget | $<enter> to $<enter> **(3% to 5%)** over project budget | $<enter> to $<enter> **(5% to 10%)** over project budget | >$ <enter> **(>10%)** over project budget |
| **Time Schedule (Target Program)** | < <enter> days / weeks / months **(<1% of program)** over the critical path program | <enter> to <enter> days / weeks / months **(1% to 2% of program)** over the critical path program | <enter> to <enter> days / weeks / months **(2% to 3% of program)** over the critical path program | <enter> to <enter> days / weeks / months **(3% to 5% of program)** over the critical path program | ><enter> days / weeks / months **(>5% program)** over the critical path program |
| **Environment & Natural Resources** | * Low severity environmental impact(s) or impact on natural resources availablity that are promptly reversible and affected area is within the site boundary | * Nuisance or low severity environmental impact(s) or impact on natural resources availablity that are promptly reversible and affected area is outside the site boundary | * Moderate severity environmental impact(s) or impact on natural resources availablity where the affected area is within the site boundary | Moderate severity environmental impact(s) or impact on natural resources availablity where the affected area is outside the site boundary | High severity environmental impact(s) or impact on natural resources availablity at local scale significance |
| **Quality** | * Rework Costs less than or equal to 20K | * Rework Costs less than or equal to 100K but greater than 20K | * Rework Costs less than or equal to 250K but greater than 100K | * Rework Costs less than or equal to 5% contract value but greater than 250K | Rework Costs greater than 5% of contract value |
| **Reputation / Community / Media** | * Public concern restricted to local complaints<br>* Lack of contribution to the community | * Minor, adverse local public or media attention and complaints<br>* Employees warned only<br>* Minor change in community amenity values | * Attention from media and/ or heightened concern by local community<br>* Stakeholder action will disrupt planned project activities<br>* Disciplinary action may be taken<br>* Temporary reduced community access to services or employment | * Significant adverse national media / public / NGO attention<br>* Considerable and prolonged adverse community impact and dissatisfaction publicity expressed<br>* Stakeholder action will delay achievement of major elements of the Project<br>* Permanently reduced community access to services or employment | * Serious public or media outcry with international coverage<br>* Significant adverse community impact & condemnation<br>* Stakeholder action will prevent achievement of the project objectives<br>* Reduced cohesion of community |
| **Governance / Legal / Regulatory** | * Very minor technical breach of regulation or policy or code of ethics. No fine / penalty | * Minor legal issues, non-compliances and breaches of regulation, policy or code of ethics<br>* Enforceable Undertaking | * Moderate breach of regulation, policy or code with investigation or report to authority<br>* Moderate legal proceedings initiated<br>* Several Improvement Notices | * Significant breach of regulation, policy or code with fine or other regulatory action. Significant litigation / legal action<br>* Shut down of part of a project due to regulatory breach<br>* Prohibition Notice | * Major breach of regulation, policy or code with fine<br>* Major litigation<br>* Major investigation by regulatory body<br>* Prosecution / Accreditation loss |
| **Management Impact** | * Impact of event absorbed through normal activity | * Will require some local management attention over several days | * Significant event that can be managed with careful attention, will take some project managers much time for several weeks<br>* Local operation of contingency plan | * Major event that requires the implementation of crisis and contingency plans at a project level, regional area or support function (DRP)<br>* Will require the involvement of senior managers and will take up the time of project managers for several weeks | * Critical event or disaster with significant impact on John Holland that requires considerable senior management time to handle over several months<br>* Full implementation of an John Holland's crisis management plan for days to weeks |

| PROBABILITY OR CHANCE | QUALITATIVE ASSESSMENT | RECURRENCE TIMEFRAME | | CONSEQUENCE | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | **RATING** | **1** | **2** | **3** | **4** | **5** |
| ≥ 90% | Almost certain to occur during the project / contract life | Less than "Monthly" | LIKELIHOOD | **ALMOST CERTAIN** | D | C | B | A | A |
| 51% to 89% | Considered likely to occur during the project / contract life | "Monthly" to "Yearly" | | **LIKELY** | D | D | C | B | A |
| 30% to 50% | Considered a possible occurrence during the project / contract life | Between 2 and 5 years | | **POSSIBLE** | E | D | C | C | B |
| 5% to 29% | Considered unlikely to occur during the project / contract life | Between 5 and 20 years | | **UNLIKELY** | E | E | D | C | B |
| < 5% | Considered a rare occurrence to happen during the project / contract life | Greater than every 20 years | | **RARE/REMOTE** | E | E | D | D | C |

| CONTROL EFFECTIVENESS | GUIDANCE |
|---|---|
| Satisfactory | Nothing more to be done except review and monitor the current controls. To the extent that is reasonably achievable, controls are well designed for the risk (i.e. follow the hierarchy of controls) and address the root |
| Improving | Controls are designed correctly, are in place and operating reasonably effectively. Some minor/ isolated exceptions may exist, however do not represent a systematic weakness in operating effectiveness. Some more work to be done to improve the overall effectiveness. |
| Partial | While the design of controls may be largely correct in that they treat most of the root causes of the risk, implementation and/or operational effectiveness is only |
| Poor | Significant control gaps. Either controls do not treat root causes or they do not operate at all effectively. Controls, if they exist are just reactive rather than proactive. |
| Nil | Virtually no credible control. Management has no confidence that any degree of control is being achieved due to poor control design and/or very limited operational effectiveness. |

| Residual risk / opp Rating | Suggested action | Timing of status report and management plans | Authority to accept or tolerate risk. |
|---|---|---|---|
| A | Take action to eliminate or implement additional controls to reduce it to acceptable level (ALARP/SFAIRP).<br><br>"WHS / Environmental risks" the task or activity must not be performed. An alternative solution must be found. | Notify as soon as practicable, normally with 24 hours.<br><br>Manage and re-evaluate risk / opportunity to allow Business Unit reporting monthly<br><br>Notify John Holland's relevant Board Committee and CEO / CFO | John Holland CEO / COO |
| B | Implement additional controls to reduce it to ALARP/SFAIRP.<br><br>"WHS / Environmental risks - The activity or task must not be performed without the explicit concurrence of the Project Director / Project Manager. | Notify as soon as practicable, normally within 72 hours.<br><br>Manage and re-evaluate risk / opportunity to allow project reporting monthly<br><br>Notify COO / Business Group EGM / CFO | John Holland Regional Gen Mgr or Corporate EGM / CFO as appropriate.<br>EGM, Project Director |
| C | Implement additional controls reduce it to ALARP/SFAIRP where it is cost-effective to do so.<br><br>"Onsite activities" – must not commence without Site Management review | Manage and re-evaluate risk / opportunity to allow project reporting monthly | John Holland Operational / Construction / Project Manager / Director |
| D | Implement additional controls to reduce to ALARP / SFAIRP (may be tolerable). | Manage and re-evaluate risk / opportunity to allow project reporting monthly | John Holland Team Leader |
| E | Lower priority (likely to be tolerable). | Monitor, manage and carryout activity in accordance with identified controls | John Holland Supervisor |

## Hierarchy of Controls