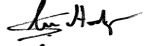
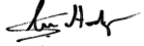
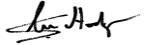
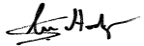
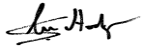


North West Rail Link Environmental Compliance Tracking Procedure



PROJECT	North West Rail Link	DATE	1 March 2013
GROUP	Customer Strategy and Planning	STATUS	FINAL
AUTHOR	Marrinan, Matthew	REVISION	1.3
COMPANY	TfNSW	FILE NUMBER	A1982188
FILE NAME	North West Rail Link Compliance Tracking Program		

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1.1	20/12/2012	Final	Submission to DP&I	M.Marrinan	S.Hodgson	
1.2	1/03/2013	Final	Response to DP&I	M.Marrinan	S.Hodgson	
1.3	1/10/2013	Final	Updated CTP	M.Marrinan	S.Hodgson	
1.4	25/11/13	Final	IMS update	M.Marrinan	S.Hodgson	
1.5	06/07/14	Final	Submission to DP&I	M.Marrinan	S.Hodgson	

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1 Introduction

1.1 Background

The NWRL will deliver a new high frequency single deck train system initially operating as a shuttle between Cudgegong Road, Rouse Hill and Chatswood. The NWRL includes eight new stations, approximately 15.5 kilometres of tunnels from Epping to Bella Vista, a four kilometre elevated 'Skytrain' (viaduct) between Bella Vista and Rouse Hill, and conversion of the existing Epping to Chatswood Rail Link to deliver high frequency rapid transit services.

Key features of the NWRL project include:

- Single deck, rapid transit service between Cudgegong Road and Chatswood;
- Rolling stock – modern, single deck, rapid transit carriages;
- Eight new stations as presented in the reference scheme;
- Station precinct development with integration into the road and bus network;
- Two elevated stations (at Rouse Hill and Kellyville) and an at grade station at Cudgegong Road;
- Train stabling and maintenance facilities at Tallawong Road;
- 23 km of new track and rail infrastructure between Epping and Cudgegong Road, (unchanged from reference scheme);
- Rail track and systems (power, ventilation, communication, signalling, etc);
- Approximately 4 km of elevated rail track (The Skytrain) and 4 km of at grade track between Bella Vista and Cudgegong Road;
- Excavations for the Cherrybrook, Castle Hill, Hills Centre, Norwest and Bella Vista Stations;
- Approximately 15.5 km of twin running tunnels (approximately 6.1 metres in internal diameter) between Epping Station and Bella Vista Station. The running tunnels will be constructed primarily by tunnel boring machine;
- Cross passages between the running tunnels;
- Mined caverns, niches and openings for rail crossovers and equipment;
- Permanent concrete lining of all tunnels, caverns, cross passages and underground openings which must allow for all future track bed and rail services fixings; and
- Systems and stations on the existing 13 km Epping to Chatswood Rail Link upgraded and converted to create an integrated service from Cudgegong Road to Chatswood.

1.2 Statutory context

The North West Rail Link is subject to environmental assessment under the Environmental Planning and Assessment Act 1979 (EP&A Act). It is classified as Critical State Significant Infrastructure. Under amendments to the EP&A Act, the Concept Plan for the project, which was approved in 2008, is taken to be a Staged Infrastructure Approval under Part 5.1 of the Act.

Before work can commence on the project, detailed environmental assessments have been carried out and approved by the Minister for Planning and Infrastructure. These Planning Approvals for the project are described below:

1.2.1 Major Civil Construction Works Planning Approval

The first Environmental Impact Statement (EIS 1) assessed impacts for Major Civil Construction Works. This covered activities including tunnelling and viaduct construction. It was approved by the Minister for Planning and Infrastructure on 25 September 2012.

The Planning Approval (Infrastructure Approval SSI-5100) and related environmental assessment documents are located at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5100

The Staging Report which describes how TfNSW and its Contractors will comply with this approval is located at:

<http://nwrail.transport.nsw.gov.au/>

This Approval was modified in April 2013 to incorporate changes to the Showground Station and adjacent precinct. The Modification and related environmental assessment documents are located at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5645

1.2.2 Stations, Rail Infrastructure and Systems Planning Approval

The second Environmental Impact Statement (EIS 2) assessed Stations, Rail Infrastructure and Systems. This covered construction and operation of the railway itself, including stations and stations precincts, rail systems and infrastructure. It was approved by the Minister for Planning and Infrastructure 8 May 2013.

The Planning Approval (Infrastructure Approval SSI-5414) and related environmental assessment documents are located at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5414

This Staging Report identifies how TfSNW and its Contractors will comply with the conditions Infrastructure Approval SSI-5414.

An application has been made to modify the Infrastructure approval SSI-5414, associated with altering the approved viaduct structure with a cable stayed bridge over Windsor Road, Rouse Hill. The Department for Planning and Infrastructure is collating the submissions received during the exhibition period.

The environmental assessment documents supporting the modification application is located at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6389

1.2.3 Rapid Transit Rail Facility Planning Approval

With the announcement of Sydney Rail Futures and the future Rapid Transit Network, a Rapid Transit Rail Facility (RTRF) is required. The RTRF provides for a train stabling and maintenance facility, a section of track for testing, administration staff and training facilities including an Operations Control Centre. An EIS has been prepared for the construction and operation of the RTRF and approval was granted by the Minister for Planning and Infrastructure on 15 January 2014.

The Planning Approval (Infrastructure Approval SSI-5931) and related environmental assessment documents are located at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=5931

1.3 Purpose of this compliance tracking program

This document describes the Compliance Tracking Program (CTP) which has been implemented to meet obligations under the MCoA. It states how communication and reporting on the compliance status of the NWRL will be undertaken and defines the frequency and type of surveillance activities.

This Compliance Tracking Program addresses the MCoA requirements as identified in Table 1.

Table 1 Selected Minister’s Conditions of Approval

MCoA ref.	Text of Condition	Report ref.
D5	The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The Program shall be submitted to the Director General for approval prior to the commencement of construction and operate for a minimum of one year following commencement of operation. The Program shall include, but not necessarily be limited to:	This report
	(a)provisions for the notification of the Director General prior to the commencement of construction of the SSI (including prior to each stage, where works are being staged);	S2.1
	(b) provisions for periodic review of the compliance status of the SSI against the requirements of this approval;	S3.2
	(c) provisions for periodic reporting of compliance status to the Director General, including a Pre-Construction Compliance Report, during construction reporting, and a Post-Construction Compliance Report;	S3.3.1
	(d) a program for independent environmental auditing in accordance with ISO 19011:2003 - Guidelines for Quality and / or Environmental Management Systems Auditing;	S3.3
	(e) mechanisms for recording environmental incidents during construction and actions taken in response to those incidents;	S3.4
	(f) provisions for reporting environmental incidents to the Director General and relevant public authorities during construction;	S3.4
	(g) procedures for rectifying any non-compliance identified during environmental auditing, review of compliance or incident management;	S3.4.1
	(h) provisions for ensuring all employees, Contractors and sub-Contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.	S3.5

2 Construction stages

The NWRL project is a Staged Infrastructure Approval under Part 5.1, subsequent to the recent amendments to the *EP&A Act* on 1 October 2011. Staged development allows the project to maintain milestones, in particular those planning milestones which feed into the tender process.

The first stage of development which has been split into three distinct construction packages with each one being managed by a lead Contractor:

- Stage 1(a) - Early Works Managing Contract (EWMC);
- Stage 1(b) - Tunnel and Station Civils works (TSC); and
- Stage 1(c) - Surface and Viaduct Civils works (SVC).

The second stage of development has been split into two construction packages with each one being managed by a lead Contractor:

- Sub-stage 2a: Surface and Viaduct Civil (SVC); and
- Sub-stage 2b: Operations Trains and Systems (OTS).

The Early Works package (Stage 1a) precedes both the Tunnel and Station Civils (Stage 1b) and the Surface and Viaduct Civils (Stage 1c). Stage 1b and 1c will largely occur concurrently. As a result of this staging of works, each MCoA has been assessed by TfNSW to identify compliance requirements for each package. Stages 2a and 2b will also largely occur concurrently with the commencement of 2a scheduled shortly before 2b.

While TfNSW will retain overall control of the CTP, the Contractors will have responsibilities under their Project Deed to provide input into the program.

Figure 1 - Stage 1 North West Rail Link Works

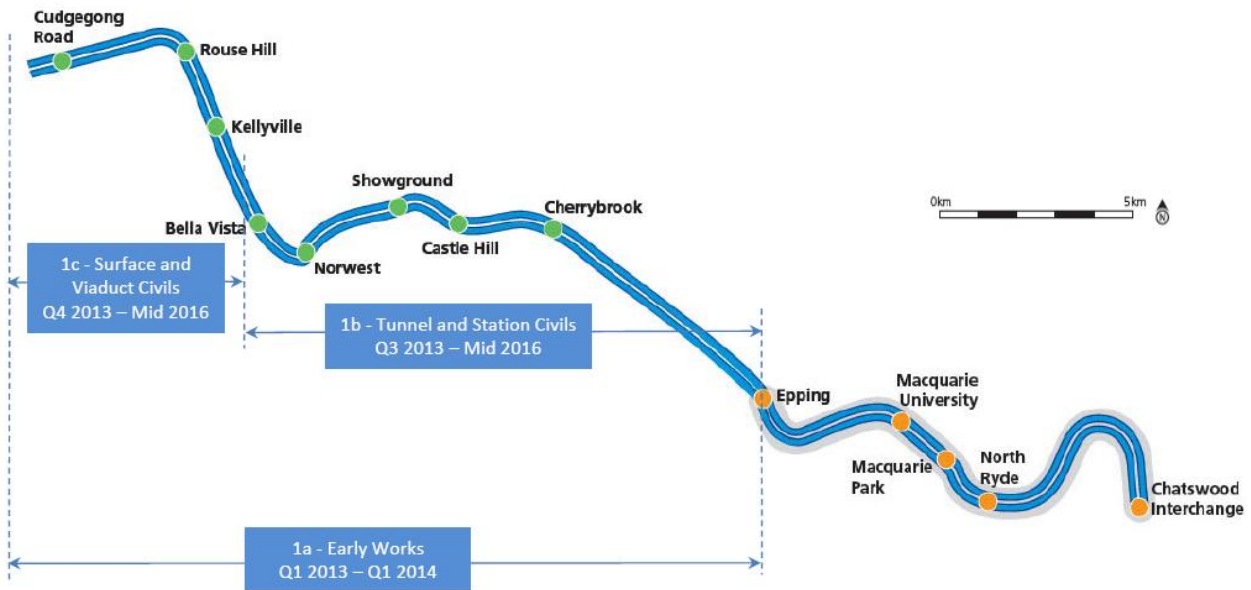
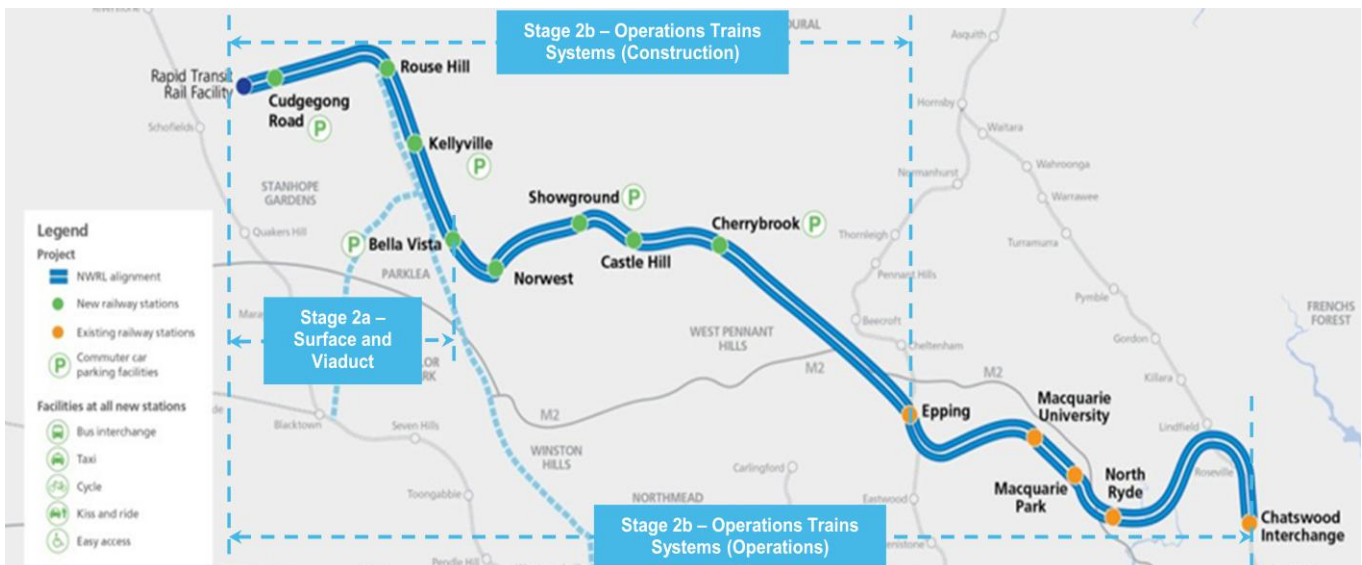


Figure 2 - Stage 2 North West Rail Link Works



2.1 Notification of staged works

Each Environmental Impact Statement (EIS) represents the detailed environmental impact assessment for Stage 1 and 2 for the project.

Project staging is described in the NWRL Staging Report produced to meet condition B9 of the MCoA. This report details how the MCoA are distributed across each of the major contract packages and determines the extent to which each package needs to demonstrate compliance for each.

TfNSW will notify the Director General in writing at least one month prior to the commencement of each stage.

3 Environmental management

The EIS contains the Construction Environmental Management Framework (CEMF). The CEMF represents TfNSW’s minimum requirements for environmental management and specifies a standard framework that each Contractor must establish and document in their CEMP. Some of these requirements specifically relate to the CTP, including:

- Compliance management and reporting;
- Training, awareness and competence;
- Environmental monitoring, inspections and auditing;
- Emergency and incident response; and
- Environmental non-conformances.

Compliance with the CEMF is a contractual requirement for all NWRL Contractors.

3.1 Environmental Compliance Framework

The NWRL is subject to a number of environmental compliance requirements relating to the:

- **NSW Protection of the Environment Operations Act (POEO Act)** – where the NWRL Environmental Protection Licence (EPL) Strategy has identified a number of EPLs that are required during the delivery and operation phases of the project. These EPLs will be held by Contractors for relevant aspects of their work, including for operations;
- **NSW EP&A Act** – where the NWRL planning approvals strategy has identified the need for two Infrastructure Approvals (IAs), refer Section 1.2 of this report; and
- **Commonwealth Environment Protection and Biodiversity Conservation Act (Cwth EPBC)** – where the project is a “controlled action” as a result of impacts to listed threatened species.

Compliance with the approvals associated with the above instruments is the shared responsibility of TfNSW and the Contractors as illustrated in Figure 3.

Figure 3 identifies the stages of delivery and the respective Contractors that have responsibility for compliance alongside TfNSW. The Stage 2 Infrastructure Approval will have a strong design and operational focus and accordingly the Operations, Trains and Systems (OTS) Contractor will be primarily responsible for compliance.

Figure 3 - NWRL Environmental Compliance Framework

Environment and Planning Legislation and Approvals			POEO Act	NSW EP&A Act Approvals					Cwth Approval	Other Cwth and State Legislative Requirements (under review)
			Environmental Licence	EIS1	EIS2	RTRF	ECRL conv	PRL	EPBC	
Compliance tracking responsibility	Stage 1	TfNSW		✓	✓	✓	✓	✓	✓	✓
		EWMC	✓	✓	✓					✓
		TSC	✓	✓						✓
		SVC	✓	✓	✓					✓
	Stage 2	OTS (del)	✓		✓	✓	✓	✓		✓
		OTS (ops)	✓		✓	✓	✓	✓		✓
		ECRL Con	?							

NWRL EPL Strategy
Transaction management - allocation of obligations

3.2 Periodic review of Compliance

A variety of activities are undertaken to ensure that compliance is managed effectively. Commitments to undertake regular monitoring of compliance are drawn from the NWRL project Environmental Management System (inclusive of the Construction Environmental Management Framework) and the Contractor’s Construction Environmental Management Plans (CEMP). These activities are summarised in Table 2.

Table 2 Compliance monitoring activities

Activity	Responsibility
Daily	
Ongoing site surveillance	Contractor(s) and TfNSW
Weekly	
Environmental Representative inspection	Independent ER
Environmental Manger’s site inspections	Contractor(s) and TfNSW
Review of environmental actions and controls	Contractor(s)
Monthly	
Environmental compliance status update	Contractor(s) to TfNSW TfNSW to Project Executive
Quarterly	
Risk assessment review	Contractor(s)
Compliance Tracking Register review	TfNSW and Independent ER
Six Monthly	
Internal EMS auditing & Independent Environmental Auditing	Contractor(s) 3 rd party auditor
Annual	

Activity	Responsibility
TfNSW Management review	TfNSW
Audit of Contractor's EMS	TfNSW

3.3 Auditing and Reporting

3.3.1 Auditing

Two levels of environmental auditing occur during the construction of the NWRL. The first level consists of an internal audit program by each Contractor. These audits include:

- Compliance with approval, permit and licence conditions;
- Compliance with the Contractor's, CEMP, sub-plans and procedures;
- Community consultation and complaint response procedures;
- Environmental training records; and
- Environmental monitoring and inspection results.

The second level is undertaken by TfNSW through the Compliance Working Group (CWG). The CWG coordinates the independent environmental audit required by condition D5(d). While planned independent audits are generally 6 monthly, the CWG meet monthly to review the status of risks, non-conformance, incidents, and determine appropriateness of scope and frequency of the planned audit schedule.

3.3.2 Management Review

In addition to these audit programs each Contractor is required to undertake management reviews of their EMS at six monthly intervals in accordance with section 4.6 of AS/NZS ISO 14001:2004. During these reviews the results of audits, incidents and non-conformances are taken into account and used to determine where improvements to their management system are required.

TfNSW also undertake management reviews of the NWRL EMS annually to ensure its continual suitability, adequateness and effectiveness.

3.3.3 Environmental Representative

The Environmental Representative (ER) for the NWRL will meet condition E44(a-g) of the MCoA which includes the responsibility to ensure environmental auditing is undertaken in accordance with the Proponent's Environmental Management System (E44(d)). Inspections by the ER are the primary means by which advice and information on the environmental performance or impacts of the NWRL Project are communicated to the Proponent. The specific requirements of condition E44 are listed below:

- a) be the principal point of advice in relation to the environmental performance of the SSI;
- b) monitor the implementation of environmental management plans and monitoring programs required under this approval and advise the Proponent upon the achievement of these plans/ programs;
- c) have responsibility for considering and advising the Proponent on matters specified in the conditions of this approval, and other licences and approvals related to the environmental performance and impacts of the SSI;
- d) ensure that environmental auditing is undertaken in accordance with the Proponent's Environmental Management System(s);

- e) be given the authority to approve/ reject minor amendments to the Construction Environment Management Plan. What constitutes a “minor” amendment shall be clearly explained in the Construction Environment Management Plan (condition E46);
- f) be given the authority and independence to advise on reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts; and
- g) be consulted in responding to the community concerning the environmental performance of the SSI where the resolution of points of conflict between the Proponent and the community is required.

3.3.4 Reporting compliance to the Director-General

To support the two audit programs, this CTP records the status of each MCoA and updates this information on a regular basis. Compliance reports are prepared for the Director General in accordance with D5(c) and where appropriate these reports may be incorporated into notification of commencement on each stage of construction (B9). During construction, the CTP is used to report to the Director General on a six monthly basis. In all cases, compliance reporting is submitted by the NWRL Project Director or delegate.

Table 3 Schedule of compliance reporting

Submission Type	Description	Timing
Approval	Initial submission to the Director General for approval	December 2012
Stage 1(a) – Early Works	Notification to the Director General that this stage is commencing	December 2012
Pre-Construction Compliance Report	Description of compliance status of the project prior to the commencement of construction.	April 2013
During Construction Compliance Report	Ongoing six monthly compliance reports.	November 2013
Post Construction Compliance Reporting	Description of compliance status of the project after the completion of construction.	TBA
Stage 1(b) - Tunnel and Station Civils	Notification to the Director General that this stage is commencing	November 2013
Stage 1(c) – Surface and Viaduct Civils	Notification to the Director General that this stage is commencing	May 2014
Incident	Detailed report of major incidents, and subsequent investigations. Minor incidents may also be provided as either summary information or in detailed format depending on the requirement of the Director General.	Ongoing

3.4 Incident Management

Emergency and incident response procedures are produced by each Contractor as well as TfNSW and include:

- Categories for environmental emergencies and incidents;
- Forms for recording of environmental incident details and response;
- Notification protocols for each category of environmental emergency or incident, including notification of TfNSW and notification to owners / occupiers in the vicinity of the incident;

- Procedures for the immediate notification of each relevant authority when the incident results in material harm to the environment;
- The NWRL Project Director will notify the Director General within 48 hours of becoming aware of an off-site incident that significantly affects the people or the biophysical environment. This notification will be followed by a full written report within 7 days of the date on which the incident occurred;
- Identification of personnel who have the authority to take immediate action to shut down any activity, or to affect any environmental control measure (including as directed by an authorised officer of the EPA); and
- On-site rectification actions.

NWRL has an integrated approach to Incident Management that is detailed in the shared procedure Incident Investigation.

NWRL Contractors are required to develop and implement a Pollution Incident Response Management Plan, in accordance with the requirements of the POEO Act.

3.4.1 Rectification of non-compliance

NWRL Contractors will document and detail any non-conformances arising out of the above monitoring, inspections and audits in accordance with the NWRL Non-Conformance Management Procedure.

Contractors are required to develop and implement corrective actions to rectify any non-conformance and preventative actions in order to prevent the re-occurrence of the non-conformance. Contractors maintain a register non-conformances, corrective actions and preventative actions.

3.4.2 Complaint Management

Complaints are handled through the NWRL Complaints Management System which forms part of the North West Rail Link (NWRL) Communications Management System. The System for managing complaints was approved by DP&I on 19 March 2013 and includes procedures includes processes for:

- Responding to complaints;
- Recording complaints;
- Escalation;
- Mediation; and
- Reporting.

3.5 Competency and training

Training is an ongoing activity applied at all levels of the NWRL project team as well as the NWRL Contractors. Training needs are identified and managed through Element 5 Governance, Performance, Assurance and Business Systems by the shared NWRL Training and Competency Management Plan. This plan details the methods of identifying and supporting environmental training needs.

Identifying the roles which hold environmental responsibilities, or roles where interactions with the environment are possible, is the starting point for establishing competent management of environmental risk.

TfNSW and NWRL Contractors will be responsible for determining the training needs of their personnel. As a minimum this will include site induction, regular toolbox talks and topic specific environmental training.

The site induction will be provided to all site personnel and will include, as a minimum:

- Training purpose, objectives and key issues;
- Contractor's environmental policy and key performance indicators;

- Due diligence, duty of care and responsibilities;
- Relevant conditions of any environmental licence and the relevant conditions of approval;
- Site specific issues and controls including those described in the environmental procedures;
- Reporting procedure for environmental hazards and incidents; and
- Communication protocols.

Toolbox talks will be held on a regular basis in order to provide a project or site wide update, including any key or recurring environmental issues.

Topic specific environmental training, e.g. erosion and sediment control training will be undertaken for relevant site personnel as determined by the Contractors.

3.6 Legislative and regulatory requirements

In addition to compliance with the Conditions of Approval TfNSW will continue to identify the Commonwealth and NSW legislation that is relevant to the delivery of the NWRL. In particular where there are changes to legislation and regulations a review of the NWRL IMS documentation and procedures is co-ordinated by the IMS custodian and recommendations to update any affected management plans is made. This process is further described in the NWRL Changes to Planning and Environmental legislations, regulations and aspects procedure.

4 Compliance Accountability and Tracking

4.1 Allocation of Conditions

Given the nature of the NWRL project the MCoA's will be required to be met at various times during the delivery of Stage 1 and by different parties. TfNSW has undertaken an analysis of the MCoA's and allocated as:

- **TfNSW:** The MCoA is the prime responsibility of TfNSW with limited requirements placed on the delivery Contractors. An example of this is MCoA C5 relating to Biodiversity is TfNSW's responsibility to identify and implement the appropriate biodiversity offset strategy.
- **Contractor:** The MCoA is the prime responsibility of the delivery Contractor(s). The MCoA could relate to just one Contractor as it relates to their scope, for example MCoA's relating to tunnelling apply to the TSC Contractor only. Many MCoA's are shared as they relate to construction processes and requirements that apply to all delivery Contractors, for example the implementation of management plans
- **Shared:** The MCoA requires compliance activities to be met by TfNSW and the delivery Contractors. The Traffic and Transport Liaison Group is a shared responsibility as while it is chaired by TfNSW, delivery Contractors are required to assist in facilitating and providing information.

In addition to the allocation to respective parties, there remain accountable managers within the TfNSW NWRL project team.

The TfNSW NWRL project team is headed by a Project Director (PD), with support from functional areas, each headed by a Deputy Project Director (DPD). The functional areas include:

- Project Director (PD);
- Civil Works (CW);
- Operations Trains Systems (OTS);
- Rapid Transit Integration (RTI);
- Safety, Environment and Business Systems (SEBS); and
- Stakeholder and Community Liaison (S&CL).

4.2 Environmental Licences and Approvals

TfNSW has established an EPL licensing strategy that requires each major contractor on the NWRL project is required to obtain an Environmental Protection Licence (EPL) in accordance with the Protection of the Environment Operations Act (POEO Act.). Any other licences or approvals which may be sought from time to time are also obtained and complied with by major contractors.

4.3 Compliance Status

Each Condition of Approval has been assessed to determine how it will be complied with over the life of the project. Specific details of this assessment are contained in the NWRL Staging Report. Each condition is initially determined to be **Active** at the project level until each works package to which it applies has provided evidence that it has discharged its obligations as described in the NWRL Staging report. At this point the condition will become **Inactive** (Figure 4).

Within each works package each applicable condition progresses through three distinct phases:

Pending: The condition is determined to apply to the works package, however that works package has not yet commenced construction or non-construction activities.

Ongoing: The condition is determined to apply to the works package and that works package has commenced construction or non-construction activities.

Complete: The condition is determined to apply to the works package and no further evidence is required to demonstrate compliance.

Where TfNSW has retained the obligation to comply with a particular condition, or holds a partial responsibility as defined in the NWRL Staging Report, it will be classified as **Ongoing** and tracked in the same manner as a works package.

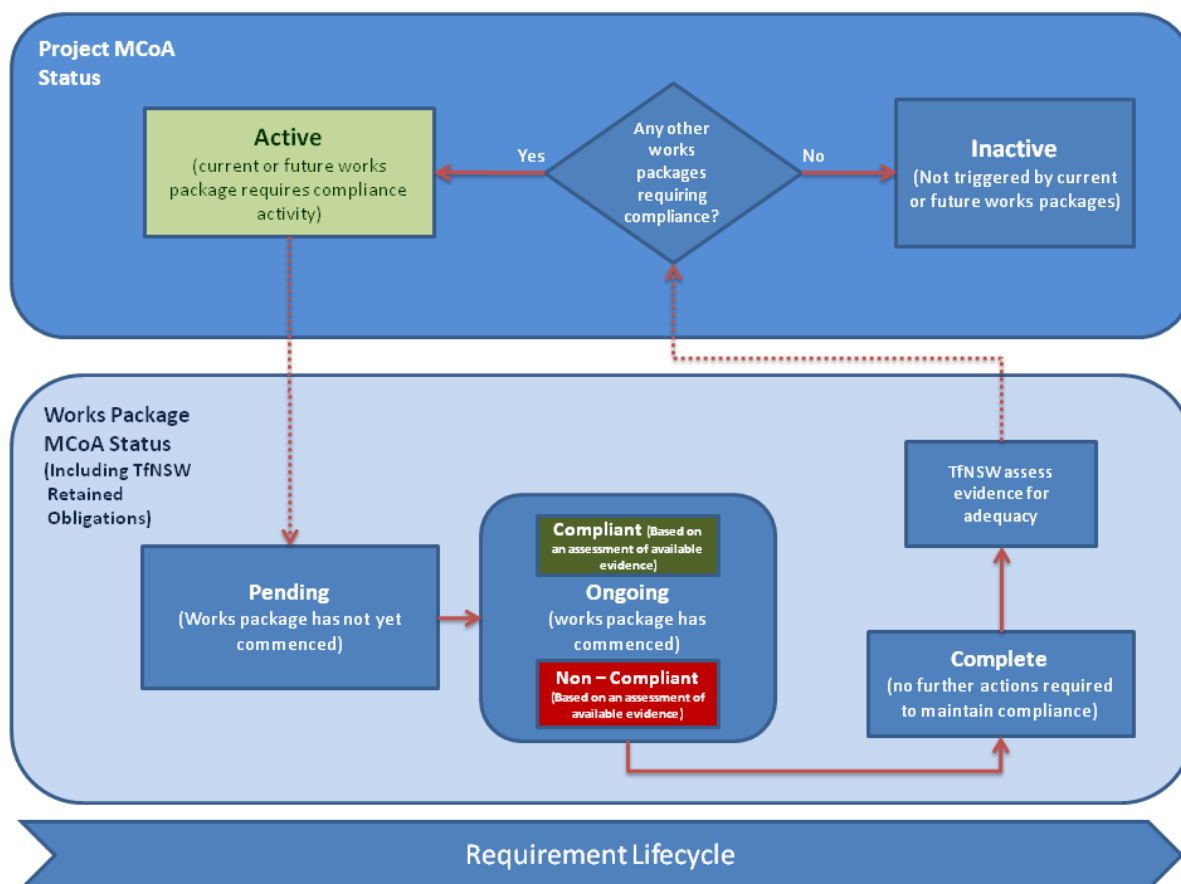
Compliance is assessed for Conditions of Approval with an **Ongoing** status and can be determined to be either **Compliant** or **Non-compliant**. These assessments occur in line with the activities outlined in Table 2.

For the purposes of the NWRL Compliance Tracking Program Compliant and Non-Compliant are defined as:

Compliant: A temporary status assigned to a Condition of Approval which indicates a check of evidence has occurred and confirmed it is adequate to demonstrate the requirements of a condition is being met on the day it was checked.

Non-Compliant: A temporary status assigned to a Condition of Approval which indicates a check of evidence has occurred and confirmed it is inadequate to demonstrate the requirements of a condition is being met on the day it was checked.

Figure 4 - MCoA Lifecycle



5 RACI Chart

Task	R	A	C	I
Correspondence and Reporting to DP&I	Manager Environment	Deputy Projector Director (Safety, Environment and Business Systems)	Principal Manager of Environment and Sustainability and Planning	Contract Delivery Management Representative Contractors Environment Manager
Compliance Management	Manager Environment	Principal Manager of Environment and Sustainability and Planning	Environmental Representative Manager Stakeholder Liaison Contract Delivery Management Representative Contractors Environment Manager	NWRL Project Executive
Emergency and Incident Response	Contractors Environment Manager	NWRL Project Executive	Principal Manager of Environment and Sustainability and Planning Manager Environment	All Staff
Non-conformance Management	Manager Environment	TBA	TBA	TBA
Ongoing site surveillance	Contractors Environment Manager	Contractors Project Director	Contractors Site Staff	Environmental Representative upon request
Environmental Representative inspection	Environmental Representative	Principal Manager of Environment and Sustainability and Planning	Contractors Environment Manager	Principal Manager of Environment and Sustainability and Planning Manager Environment
Review of environmental actions and controls	Contractors Environment Manager	Principal Manager of Environment and Sustainability and Planning	Contractors Site Staff	Principal Manager of Environment and Sustainability and Planning Manager Environment
Environmental compliance status update	Manager Environment	Principal Manager of Environment and Sustainability and Planning	Environmental Representative Contractors Environment Manager	NWRL Project Executive
Risk assessment review	Manager Environment	Principal Manager of Environment and Sustainability and Planning	Risk Manager	NWRL Project Executive
Compliance Tracking Register review	Manager Environment	Principal Manager of Environment and Sustainability and Planning	Environmental Representative Contractors Environment Manager Contract Delivery Management Representative	NWRL Project Executive
Internal EMS auditing	Contractors Environment Manager	Principal Manager of Environment and Sustainability and Planning	Contractors Site Staff	Principal Manager of Environment and Sustainability and Planning Manager Environment Environmental Representative
Independent Environmental Auditing	Manager Safety and Business Systems	Principal Manager of Environment and Sustainability and Planning	Independent Environmental Auditor	NWRL Project Executive Principal Manager of Environment and Sustainability and Planning Manager Environment Contract Delivery Management Representative Environmental Representative

TfNSW Management review	Principal Manager of Environment and Sustainability and Planning Manager Environment	Deputy Projector Director (Safety, Environment and Business Systems)	Independent Environmental Auditor Environmental Representative Contract Delivery Management Representative Manager Safety and Business Systems	NWRL Project Executive
Audit of Contractor's EMS	Manager Safety and Business Systems	Principal Manager of Environment and Sustainability and Planning	Principal Manager of Environment and Sustainability and Planning Manager Environment Environmental Representative Contractors Environment Manager	Contractors Project Director NWRL Project Executive
Environmental Representative duties	Environmental Representative	Principal Manager of Environment and Sustainability and Planning	Contractors Environment Manager	Principal Manager of Environment and Sustainability and Planning Manager Environment
Complaint Management	Manager Stakeholder and Community Liaison	DPD Stakeholder and Community Liaison	Environmental Representative Contractors Environment Manager	Principal Manager of Environment and Sustainability and Planning Manager Environment Contract Delivery Management Representative
Training Needs Analysis	Manager Environment	Principal Manager of Environment and Sustainability and Planning	Manager Safety and Business Systems	Identified Recipients of training
Provision of Training	Manager Safety and Business Systems	Principal Manager of Environment and Sustainability and Planning	Principal Manager of Environment and Sustainability and Planning Manager Environment	Identified Recipients of training
Allocation of Conditions of Approval	Manager Environment	Principal Manager of Environment and Sustainability and Planning	NWRL Project Executive Transaction Manager	Contractors Project Director Contractors Environment Manager

6 Training Needs Analysis

Task	Deputy Projector Director (Safety, Environment and Business Systems)	Principal Manager of Environment and Sustainability and Planning	Manager Environment	NWRL Project Executive	Manager Safety and Business Systems	Manager Stakeholder Liaison	Contract Delivery Management Representative	Environmental Representative	Independent Environmental Auditor	All Staff	Transaction Manager
Correspondence and Reporting to DP&I	-	-	Professional Writing for Government	-	-	-	-	-	-	-	-
Compliance Management	-	NWRL Induction DOORS training Incident Investigation	NWRL Induction EP&A Act. Training POEO Act. Training ERSED training Incident Investigation	Executive Briefing: Compliance Management	-	NWRL Induction EP&A Act. Training POEO Act. Training Incident Management	NWRL Induction EP&A Act. Training POEO Act. Training ERSED training Incident Management	NWRL Induction Incident Management	-	-	-
Emergency and Incident Response	-	Incident Management	Incident Management	Executive Briefing: Incident Management	Incident Management	Incident Management	Incident Management	-	-	Incident Management	-
Non-conformance Management	-	Incident Management	Incident Management	-	-	Incident Management	Incident Management	Incident Management	-	Incident Management	-
Ongoing site surveillance	-	-	-	-	-	-	-	-	-	-	-
Environmental Representative inspection	-	Contractor Inductions	Contractor Inductions	-	-	-	Contractor Inductions	-	-	-	-
Review of environmental actions and controls	-	Contractor Inductions	Contractor Inductions	-	-	-	Contractor Inductions	-	-	-	-
Environmental compliance status update	-	EP&A Act. Training	EP&A Act. Training	-	-	-	-	-	-	-	-
Risk assessment review	-	-	Risk Management Training	-	-	-	-	-	-	-	-
Compliance Tracking Register review	-	DOORS training	DOORS training	-	-	-	DOORS training	DOORS training	-	-	-
Internal EMS auditing	-	Contractor Inductions	Contractor Inductions	-	Contractor Inductions	-	Contractor Inductions	Contractor Inductions	-	-	-
Independent Environmental Auditing	-	-	-	-	-	-	-	-	-	-	-
TfNSW Management review	IMS Training Executive Briefing: Management Review	IMS Training	IMS Training	IMS Training Executive Briefing: Management Review	-	IMS Training	IMS Training	-	-	-	-

Audit of Contractor's EMS	Executive Briefing: Audit Program	-	-	Executive Briefing: Audit Program	-	-	-	-	-	-	-
Environmental Representative duties	-	-	-	-	-	-	-	-	-	-	-
Complaint Management	-	-	-	-	-	POEO Act. Training	-	-	-	-	-
Training Needs Analysis	-	-	-	-	-	-	-	-	-	-	-
Provision of Training	-	-	-	-	-	-	-	-	-	-	-
Allocation of Conditions of Approval	-	-	-	-	-	-	-	-	-	-	-

Appendix A Compliance Tracking Register

Note Compliance Tracking Register is appended when issued to ensure accuracy at the time of issue