HINDMARSH

Environmental Management & Sustainability Plan (EMP)

Hammondcare Stage 2

REVISION A

Content Page

Hindmarsh would like to acknowledge the Traditional Custodians of the Land on which we live and work and pay our respects to their Elders past and present.

1. Document Control – Revision History

1.1. Revision Status

Approved revisions to this document may be independently issued.

Period of Review: (project milestone)	Nominate date of review:	Review to be managed by:	Date completed:	Action Required
Plan Development	18/02/2026	Jack Isemonger	NA	NA
For Construction/ Demolition	23/02/2026	Jack Isemonger	23/02/2026	NA
Structural completion				
Internal Fit out 1st Review				
Internal fit out 2nd review				

In addition to the above milestone reviews, reviews shall be prompted through Compass > SQE Planning Documents whereby documents are reviewed and confirmed without change and re-loaded to Compass, or reviewed, amended and uploaded accordingly so that the document reflects the project needs.

1.2. Revision Status

Where revision is required the Revision Status table below shall be updated.

Date Issued	Revision	Details	Section	Page
23/02/2026	A	For Construction Issue	All	All
	B			
	C			

1.3. Project Specifics

Company Name:	Hammondcare
ABN	48 000 026 219
Project:	Hammond Stage 2
Project No:	2068
Address:	97-115 River Road, Greenwich
Client:	Hammondcare
Contract:	Design and Construction

Scope of Work / Project Description:	Demolish facility, construct 2 new seniors living towers and primary healthcare tower
Anticipated Start and Duration:	02/03/2026 143 weeks
Subcontractors	TBC

1.4. Approval for Implementation

This revision of the *Environmental Management and Sustainability Plan (EMP)* has been reviewed by the Project Manager, it complies with environmental aspects of Compass, contractual obligations and statutory requirements and is authorised for use. Draft versions of this document, although approved, are issued for comment / feedback and should not be considered as finalised until a revision number / letter is assigned.

1.5. EMP Induction

Every Project Hindmarsh employee receives induction training into the purpose and use of this EMP. Each acknowledges that they fully understand this EMP's requirements and their roles \ responsibilities associated with it. This acknowledgement is recorded via *Acknowledgement Register*.

Key elements of this EMP may be extracted for inclusion in the project specific site induction training which is given to all employees, subcontractors and site workers prior to commencing works on site.

2. Purpose and Scope of EMP

Hindmarsh operates a fully integrated Business Management System, known as Compass which incorporates our Safety, Quality and Environment business systems.

This EMP describes the environmental strategy, methods, controls, and requirements to be implemented during the execution of the project. The purpose of this EMP is to:

- Ensure company environmental objectives and targets are achieved;
- Identify the environmental issues (impacts and aspects) for this project;
- Establish, communicate and implement controls to reduce any adverse impacts on the environment which may arise from project's activities, products and services;
- Identify controls which will be implemented to mitigate high risk environmental impacts, which may eventuate during construction;
- Ensure Hindmarsh, its suppliers and subcontractors comply with all relevant environmental legislation, any applicable licenses, approvals, permits and regulatory requirements;
- Ensure works are managed to reduce adverse impacts on the environment;
- Action any outcomes from environmental incidents or accidents, project audits or other identified non-conformances and to continually improve the Environmental Management System elements within Compass; and
- Establish project-specific objectives and targets (where appropriate), and identify strategies and evidence in support of their achievements.

This EMP is intended to stand alone as the master document for the management of all site environmental activities. It should, however, be read in conjunction with other management plans, referenced appendices and documents, including;

- *Construction Management Plan (CMP)*
- *Emergency Management Plan (EMP)*
- *Safety Management Plan (SMP)*
- *Temporary Traffic Management Plan (TTMP)*
- *Quality Management Plan (QMP)*
- Dewatering Management Plan (DWP)

2.1. Sustainability

Responsible Environmental Management extends far beyond that of simple mitigation measures. Sustainability embraces environmental, social and economic accountability. Hindmarsh seeks, with its project partners, to reduce those negative impacts and maximise benefits related to all three areas across the entire project life cycle. Fundamentally, our environmental strategy and EMP requires every project to consider:

- A reduced resource consumption including improving water and energy efficiency
- Use of technology to monitor fuel use
- Sustainable methods such as pre-fabrication and modular construction
- Improvements in logistics supply chain to reduce mileage, emissions and carbon footprint
- Reuse of resources
- Use and support of recyclable resources
- Elimination of toxic substance / material use
- Use of renewable and responsibly sourced building products
- Focus on quality outcomes to prevent re-work
- Whole of life carbon assessments and targets

2.2. Environmental Management System

Hindmarsh operates an Environmental Management System as per the requirements of AS14001:2004 The system has been independently certified as meeting the requirements of both. Please refer to the *Compass Manual* for further information regarding the Hindmarsh Management System. Documents, procedures, and forms supporting this EMP have been referenced accordingly throughout this plan. Compass documents detailed within this plan are identifiable by title and are formatted in *italics and underlined.*

2.2.1. Customised Compass Templates

During the life of the project a number of Compass templates will be customised, and in some cases continually revised to address project specific requirements: for example, Risk Profile templates. To ensure these documents / records are appropriately controlled this project will utilise, either or both, Aconex and or the Site Server Electronic Filing System.

2.3 Client / Project Specific Documents

The following project specific environmental \ sustainability related documents have been referred to in the preparation of this EMP:

Reference Document	Doc Reference
Remediation Action Plan (RAP)	JK Env E32507BRrpt6 Rev1
Dewatering Management Plan (DMP)	JK Geo 32507PD5rpt2 Rev1
Acid Sulfate Soil Assessment	JK Env E32507BRrpt3 Rev2
Salinity Investigation	JK Env E32507BRpt4 Rev1
Noise & Vibration Impact Assessment	Acoustic Logic NVIA Rev4
Geotechnical Investigation Reports	JK Geo 32507R3rpt
Social Impact Assessment (SIA)	Ethos Urban SIA V4
Environmental Impact Statement (EIS)	SSD 13619238 EIS
Hazardous Building Materials Survey	HAZARD_V HazMat Survey V1

3. Strategy, Policy, Objectives and Targets

3.1. Strategy

This EMP is implemented in support of the Hindmarsh *SQE Strategic Framework*. This strategy is to be communicated and made available to all workers at all times.

3.2. Policy

The Hindmarsh *Environmental and Sustainability Policy* are to be communicated and made available to all workers at all times. At time of site induction workers are briefed on the Policy and its intent.

3.3. Company Objectives and Targets

Current company environmental and sustainability objectives and targets are detailed within the *SQE Strategic Framework*.

The following are project specific objectives and targets:

Objective:	Target:	Monitored by:	Reported via:	Frequency of Report:
Prevent and minimise adverse impacts on the environment	Zero environmental incidents reported to the regulator	Project Manager	Monthly Report	Monthly

Recognise and protect special environmental characteristics	100% of contractors site inducted into this EMP	SQE Supervisor	Monthly Report	Monthly
Maintenance of compliance to ECC	Obtain and maintain compliance with ECC	Project Manager	Monthly Report	Monthly
Recycle waste	90% of waste recycled	Site Engineer	Status Report – Project Objectives and Targets.	Monthly
Environment Inspections	1 x Monthly Environment inspections	SQE Supervisor	Monthly Report	Monthly
Environmental Complaints	Zero Environmental Complaints	Project Manager	Monthly Report	Monthly
Environmental Incidents	Zero environmental incidents reported to the regulator	Project Manager	Monthly Report	Monthly

4. Compliance

4.1. Legislative Requirements

The *Legal Register* is a list of relevant legislative and regulatory requirements applicable to general Hindmarsh construction operations. The project team has reviewed this document and has identified relevant legislative and regulatory requirements applicable to project specific operations. The project specific *Legal Register* is available upon request and has been completed as per the *Legal Requirements* procedure.

Legislative and or regulatory information may also be included in relevant *Environmental Impact Guides (EIGs)* and in the site-specific induction training provided to all employees and site workers prior to their commencement of works on site.

4.2. Monitoring of Legislative Requirements

Monitoring of Acts, Regulations, Codes of Practice and Australian standards will be managed by a subscription service called LAWLEX - http://www.lawlex.com.au. Where relative legislative change is to occur the National SQE Manager informs State SQE Manager who are then required to review changes and forward recommendations (this may be Document Change Request, email, hardcopy or other) to the SQE Systems Manager for Hindmarsh Management System (Compass) coordination.

For more detailed information please refer to *Legal Requirements* procedure.

4.3. Access to Documents

Hindmarsh employees, suppliers and subcontractors have access to legislation and regulatory documents via the internet. Where a project receives a request for an applicable legislative /

regulatory document which is not available via the internet, then the request is to be forwarded to one of the following who will arrange for a copy of the required document to be made available to the requestor.

- National SQE Manager
- SQE Administration Manager

Hindmarsh subscribes to "Building and Construction" related Australian Standards. Refer to the *Australian Standards Online Select Access* document for further information regarding access instructions and credentials required for login.

4.4. Responsibility and Authority

It is the responsibility of Hindmarsh project staff to ensure that the *Environmental Management and Sustainability Plan (EMP)* is complied with, and objectives and targets are met. To facilitate effective environmental management, specific responsibilities for implementing and supporting this EMP have been assigned.

Please refer to the *Roles and Responsibility Matrix*, for the project specific allocations.

5. Risk Management

Project risk management is completed as directed within the *Risk Management* procedure in Compass.

The *Project Risk Assessment* takes into account identified hazards (aspects) and impacts which are relevant to the project. The Project team has reviewed all available information (i.e., risk assessments, consultant reports, advice, papers, scope of works etc) to ensure the Project Risk Assessment accommodates all known issues.

Hindmarsh ensures environmental aspects and impacts are continually reviewed, risks assessed and that monitoring requirements remain relevant and current as demonstrated in the below flowchart.

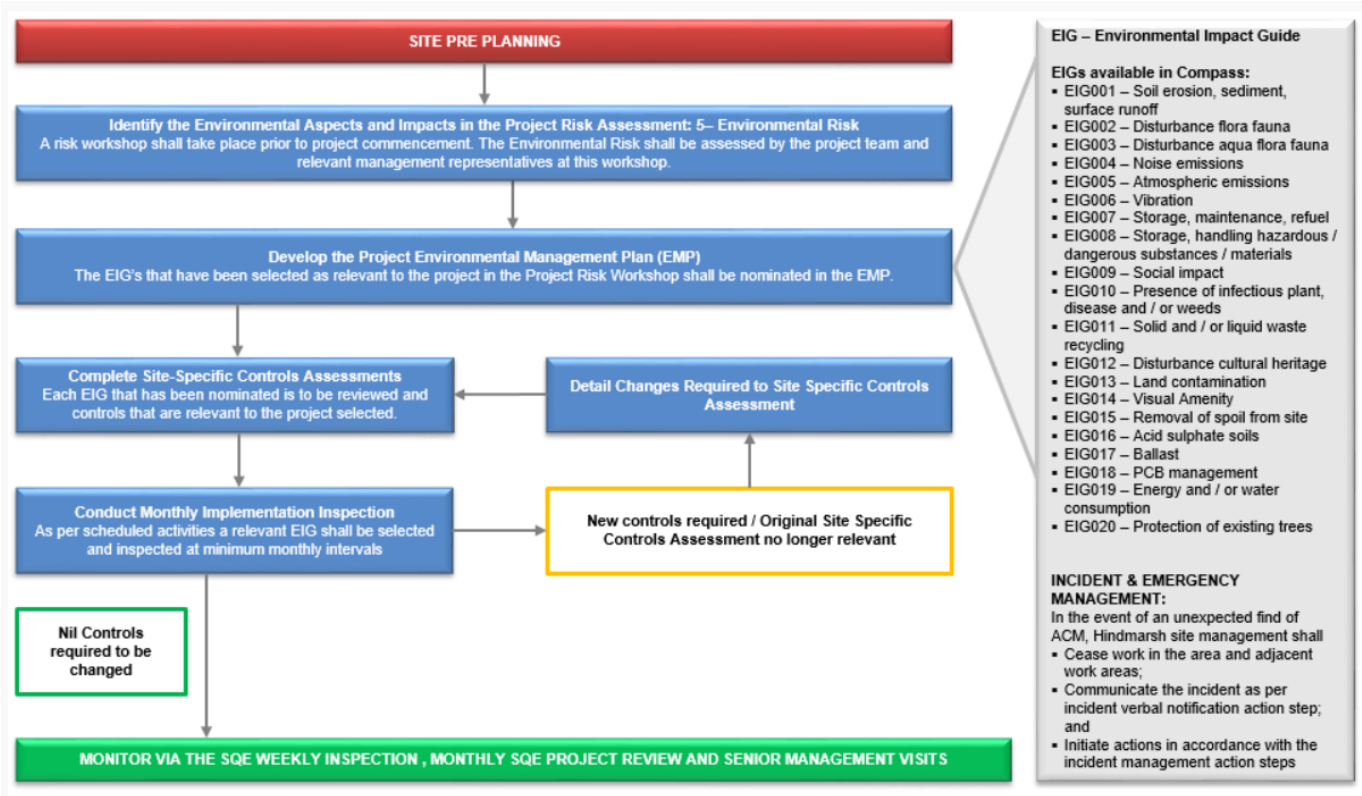
Key environmental aspects and risks are communicated to Hindmarsh employees and subcontractors based on level risk, controls implemented and or as deemed appropriate by project requirements.

The project involves demolition, bulk excavation, and construction works within an established urban environment. The site contains existing buildings, heritage elements, areas of remnant vegetation and tree protection zones, and will require significant ground disturbance including deep excavation and dewatering activities.

Environmental aspects have been identified based on the project scope, site conditions, consultant reports, and statutory approvals. These aspects relate primarily to land disturbance, groundwater interaction, contamination and hazardous materials management, noise, vibration, dust, traffic, and protection of adjacent environmental and community receptors.

Key Environmental aspects and risks applicable to this project include:

1. Ground contamination exposure during demolition, excavation, and remediation works
2. Uncontrolled release of contaminated soils or groundwater during remediation and dewatering activities
3. Disturbance and removal of known asbestos and other hazardous building materials
   Stormwater and groundwater pollution due to ineffective erosion, sediment, or discharge controls
4. Erosion and sediment migration offsite during bulk earthworks
5. Damage to protected vegetation or bushland
6. Excessive noise, vibration, or dust impacts
7. Pollution from spills, waste handling, or traffic incidents



5.1. Environmental Impact Guides – EIG's

Hindmarsh has developed a number of standard *Environmental Impact Guides (EIGs)*, these are documented procedures targeting high risk and \ or common environmental aspects and impacts which arise from general construction activities. EIGs provide the project team with general guidance regarding the management of each respective environmental impact, describes the processes involved, the permits or licenses required, the control measures to be implemented, the monitoring and reporting requirements and any emergency response measures to be implemented. Where an EIG has been selected in the *Project Risk Assessment* a Site-Specific Controls Assessment shall be conducted on the EIG to ensure it addresses project specific circumstances and requirements. These shall then be implemented on the project.

EIG's relevant to this project include:

EIG001- Soil Erosion, Sediment, Surface Run Off
EIG002- Disturbance Flora Fauna
~~*EIG003- Disturbance Aqua Flora Fauna*~~
EIG004- Noise Emissions
EIG005- Atmospheric Emissions
EIG006- Vibration
EIG007- Storage, Maintenance, Refuel
EIG008- Storage, Handling or Hazardous / Dangerous Substances / Materials
EIG009- Social Impact
~~*EIG010- Presence of Infectious Plant, Disease or Weeds*~~
~~*EIG011- Solid and / or Liquid Waste, Recycling*~~
EIG012- Heritage / Culture Management / Disturbance
EIG013- Land Contamination
EIG014- Visual Amenity
EIF015- Removal of Spoil from site
~~*EIG016- Acid Sulphate Soils*~~
~~*EIG017- Ballast*~~
EIG018- PCB Management
EIG019- Energy and or Water Consumption
EIG020- Protection of Existing Trees

6. Hazard Reporting

Hindmarsh employees, subcontractors, those working on site, as well as those visiting have a duty to report any hazard observed on site. If a hazard is suspected or identified, report the matter with urgency to a Hindmarsh Management representative who shall be responsible for recording this in the OnSite CAR Module.

Hazard information may be communicated via site induction, safe work method statement review, and \ or safety meetings (e.g. Pre Start and Toolbox) held on site.

Where a Corrective Action has been submitted reporting a hazard, Hindmarsh shall investigate and take necessary corrective action to address the issue raised to remove the hazard and \ or prevent a reoccurrence.

7. Emergency \ Incident Management

Please refer to the Projects *Emergency Management Plan (EMMP)* for information regarding emergency preparedness and response. The project-specific EMMP ensures Hindmarsh controls are in place, and assesses Emergency preparedness elements as required for the project.

The EMMP details when Environmental Emergency Drills will be conducted. This schedule must be completed and included within the EMP. Emergency Drill reports must be completed on the correct template.

7.1. Incident Management

Refer to the *Injury, Illness and Incident Management and Reporting* flow chart for detailed guidance regarding the management and reporting of injuries, illness and incidents.

Incidents occurring to the environment, flora or fauna shall be reported, investigated and corrective actions managed in accordance with the *Incident Management Procedure* and contract requirements. Contract Representative shall be responsible for ensuring incidents involving employees, contractors and visitors are reported, investigated and corrective actions assigned and completed to the relevant authorities.

Procedures and processes referenced within the above mentioned document address the following:

- Detailed definitions (SQE Definitions)
- Actions to be taken in the event of an injury, illness or incident (*Injury, Illness and Incident Response*)
- Additional reporting responsibilities and obligations associated with higher level injuries \ incidents (*Incident Actions External Notifications)*
- Incident Reporting responsibilities and expectations (*Incident Reporting Flowchart*)
- Site and or National investigation requirements
- Corrective and Preventive Action
- Analysis of data \ findings (including Objectives \ Targets status)

A *Crisis Management and Recovery Plan* supports the injury, illness and incident management process.

In the event of a Dangerous Incident, ensure site preservation and that the site where the notifiable incident has occurred is not disturbed until an inspector arrives at the site other than for the reasons set out in the WHS Legislation.

7.2. Incident Notification Guidelines

Notification Authority	Contact Method	Timing	Responsible party
Worksafe ACT	Via phone 13 22 81	Immediately on becoming aware that a notifiable incident has occurred arising out of works.	State SQE Manager
	Written – Via online Notification of Incident form	Within 48 hours	State SQE Manager
Comcare (Notifiable Incidents)	Via phone 1300 366 976	Immediately on becoming aware that a notifiable	State SQE Manager

		incident has occurred arising out of works.	
	Written – Via AE527 provided to Contract Administrator	Via Sentinel within 48 hours	Contract Administrator
OFCS	Via phone 1800 652 500	Immediately on becoming aware that a notifiable incident has occurred arising out of works.	National SQE Manager
	Written - submitted and managed through FSC Online.	Fatalities - within 48 hours All other types – within 2 weeks	National SQE Manager
Environment Protection Authority	EPA NSW	Immediately on becoming aware of an activity that could cause harm to human health or the environment through emissions to air, land and water.	National SQE Manager
Client	TSA Riley on behalf of Hammondcare	*Immediately on becoming aware that a notifiable incident has occurred arising out of works.*	Project Manager

The Serious *SQE Incident Alert* may be used to communicate lessons learned for continual improvement opportunities. A *Serious SQE Incident Alert* may be issued within Hindmarsh to communicate lessons learned and actions required arising from:

- Notifiable Incidents;
- Dangerous Incidents / Occurrences; or
- Critical Incidents where the *Crisis Management and Recovery Plan* has been enacted.

An SQE Alert may also be issued for relevant regulatory/industry alerts, or where directed via National SQE meetings to address relevant issues of recurring incidents
Record Keeping requirements for incidents shall adhere to legislative and client requirements in Sentinel and Onsite Hindmarsh System.

8. Communication \ Consultation

With many interested parties involved in the project it is critical that communication and consultation occurs efficiently and effectively between all.

With regards to environmental issues consultation and communication generally occurs when the following matters arise:

- An employer or employees identifies a hazards

- assessing any aspect \ impact (risk)
- deciding on measures to control risks
- implementing controls
- reviewing the effectiveness of controls
- reviewing and developing policies
- investigating incidents \ complaints
- changing work practices and procedures
- introducing new substances to the workplace
- changes to current health and safety Acts, Regulations, Australian Standards, Codes of Practice and other relevant environmental requirements

8.1. Consultation Requirements

In discussion with site workers (Hindmarsh employees and Subcontractors), the following arrangements have been made with regards to communication and consultation regarding environmental matters:

- Environmental Clearance Certificate
- Notice of Disruption Process
- Inclusion of environmental issues in site meetings
- Daily Prestart Meetings
- Toolbox Meetings
- Site Induction
- Weekly Subcontractor / Supervisor meetings
- Hazard Identification / Reporting and Communication
- SWMS Submission and Review
- Hazardous Substance Risk Assessment

8.2. Key Stakeholder Consultation

Hindmarsh seeks to ensure stakeholders, the local Community and authorities are satisfied by the manner in which construction activities and tasks are managed.

To facilitate this Hindmarsh will:

Stakeholder consultation for the Greenwich Health Campus project has been undertaken as part of the planning, approval, and delivery phases of the development and is ongoing.

Consultation and engagement activities are guided by the approved Community Consultation Summary (Appendix S) and Community Communication Strategy – Construction to Operational Phase (Appendix J), which establish the framework for stakeholder identification, communication mechanisms, notification processes, and complaints management.

Key stakeholders relevant to the project include, but are not limited to:

• HammondCare
• Lane Cove Council
• NSW Government agencies and service authorities
• Adjacent and nearby residents
• Greenwich Public School

• Local community and resident groups
• Utility providers and emergency services

For Stage 2 works, stakeholder consultation will continue in accordance with the established communication framework, with notifications and engagement tailored to construction activities, programme, and site conditions as required. Engagement methods include letterbox notifications, project updates, a dedicated project email address and phone line, and ongoing management of enquiries and complaints.

Records of consultation activities, notifications, and complaints will be maintained in accordance with project procedures.

8.3. Communication Summary

Communication with internal and external stakeholders regarding environmental issues will be in accordance with the following table:

Notifications

Subject	Action	Recipient	Frequency
Environmental incident	Project Manager	CLIENT	As per client requirements
Pollution \ Environmental non compliance	Project Manager	CLIENT	As per client requirements
Public complaints	Project Manager	State Manager Construction \ CLIENT	48 hours and as per client requirements
Complaint response	Project Manager	State Manager Construction \ CLIENT	48 hours and as per client requirements
Extended working hours	Project Manager	CLIENT	and as per client requirements
Discovery of threatened fauna	Project Manager	State Manager Construction	48 hours
Discovery of archaeological material incl heritage items	Project Manager	State Manager Construction \ CLIENT	48 hours and as per client requirements
Discovery of skeletal material	Project Manager	State Manager Construction \ CLIENT	24 hours and as per client requirements
Consultation Package 1	Project Manager	Key Stakeholders	As Required \ as per programme
Consultation Package 2	Project Manager	Key Stakeholders	As Required \ as per programme

High Noise \ Night Works (note these events are not planned to occur)	Project Manager	ALL	2 Days prior to works commencing

General

Subject	Action	Recipient	Frequency
EMP	Project Manager	Internal	Quarterly
Environmental CAR	Team	Project Manager	As required
Audit	National SQE Manager	Project Manager	Notify 5 days prior
Environmental performance	National SQE Manager	State Manager Construction	As scheduled via Internal Audit

Meetings

Type	Chair	Attendees	Frequency
Key Stakeholder Meeting	Project Manager	CLIENT	As required
Principal Control Group (PCG)	Project Manager	CLIENT	Monthly
Toolbox Meetings	Site Manager	As Required	Weekly
Subcontractor Supervisor Meetings	Site Manager	As Required	Weekly
Daily Prestart Meetings	Subcontractor Reps	As Required	As Required

9. Control and Monitoring

9.1. Inspections

EIG effectiveness is monitored throughout the life of the project. Where an EIG has been selected in the project risk assessment and nominated Environmental Management Plan, Site-Specific Controls shall be added to the EIG to ensure it addresses project specific circumstances and requirements.

Monitoring of controls specified in the relevant EIGs shall be conducted via:

- Monthly *Environmental Impact Guide* Inspection
- Weekly SQE Inspection
- Monthly SQE Project Review
- Senior Managers Visits (SMV) Review

Hindmarsh may outsource auditing and inspections to external consultants where specific expertise is required.

Where monitoring has identified issues, this will result in a corrective action. CARs shall be documented and managed through OnSite > SQE > CARs with appropriate actions implemented to address the CAR in a timely manner and to prevent repeat incidents.

Where CARs are not addressed appropriately, in a timely manner or there is a subsequent recurrence of the nonconformance the CAR shall be elevated to SQE Manager for consultation and resolution.

Should potential improvement to Compass policies and procedures be proposed as a result of a CAR, these shall be communicated to the National SQE Manager to evaluate and manage.

9.2. Monitoring and Measurement

Monitoring requirements for the project will be identified within the project specific *Project Risk Assessment*. All Hindmarsh owned measuring equipment must be registered on the *Equipment Calibration Register* and all associated calibration records maintained. Hindmarsh may outsource environmental monitoring to external consultants as required. Calibration records for non Hindmarsh owned equipment will be requested.

The following should be noted regarding possible noise \ vibration \ dust monitoring regimes:

- Monitoring may be undertaken in response to complaints where this is considered an appropriate response
- Monitoring that is to occur will be undertaken by personnel suitable qualified and experienced in undertaking acoustic measurements
- Monitoring may occur for plant and equipment which is perceived as 'excessively noisy' to determine the need for rectification or replacement

Where monitoring has been identified, data collected may be analysed and may result in corrective and or preventive action. If night works are required and approved by the EPA, noise levels may be monitored at the start of the activity, and at a location equivalent to the most affected noise sensitive land user to confirm adherence with EPA requirements.

9.3. Inspection and Corrective action

At minimum 1 x EIG shall be inspected per month. Site teams shall select an EIG that is in use and is deemed as critical at that time due to on site activities occurring. If during the inspection it is found that controls that were not initially assessed as relevant to the project are assessed as necessary, a new Site-Specific Controls Assessment shall be completed. Where an inspected item Fails, a Hazard or CAR appropriate to level of risk shall be entered into Project Hub.

The Scheduled *SQE Activities Matrix* shall be used to confirm the above activity has been completed.

Monitoring of controls specified in the relevant EIGs shall be conducted via the Weekly SQE Inspection, Monthly SQE Project Review and Senior Managers Visits (SMV) Review

Any environmental non conformances will be rectified via the Corrective Action process. Where nonconformity creates a hazard this will result in either:

- A hazard record being made on onsite,
- a *CAR* raised on Onsite
- the completion of an *Incident Report*.

Where a Corrective Action Required form is issued and it is not addressed in a timely manner or there is a subsequent re-occurrence of the non conformance the *Corrective Action and Escalation Process* will commence.

During project delivery Hindmarsh anticipates and encourages continual improvement in all areas of business. Continual improvement opportunities may arise from inspections, testing, auditing, incidents and or observations. Hindmarsh promotes and support the issue of corrective actions, as required, to support continual improvement requirements.

9.4. Auditing

Hindmarsh actively monitors performance and seeks potential improvement opportunities by completing internal audits. Internal audits shall be conducted by auditors (i.e., State SQE Managers) who are qualified auditors with training and qualifications obtained by a registered training organisation.

The audit scopes shall address Compass requirements, including Procedures and Management Plans, and EIGs. The *Internal SQE Audit* will be used at scheduled internal audits and rolling cross border audits. Audits shall be conducted in accordance with the Senior Management Inspection and Audit Schedule. This shall be reviewed at the Monthly National SQE Committee Meeting to consider project relevance and coordination of the monthly Cross Border Audit.

Where audits have identified issues, this will result in a corrective action. CARs shall be documented and managed through OnSite > SQE > CARs with appropriate actions implemented to address the CAR in a timely manner and to prevent repeat occurrence.

Any environmental non conformances will be rectified via the Corrective Action process. Where nonconformity creates a hazard this will result in either:

- A hazard record being made on onsite,
- a CAR raised on Onsite
- the completion of an Accident Incident Report.

Where a Corrective Action Required form is issued and it is not addressed in a timely manner or there is a subsequent re-occurrence of the non conformance the *Corrective Action and Escalation Process* will commence.

During project delivery Hindmarsh anticipates and encourages continual improvement in all areas of business. Continual improvement opportunities may arise from inspections, testing, auditing, incidents and or observations. Hindmarsh promotes and support the issue of corrective actions, as required, to support continual improvement requirements.

10. Reporting

10.1. Weekly Reporting Requirements

- Weekly SQE Inspection

10.2. Monthly Reporting Requirements

- Monthly SQE Project Review
- Monthly EIG

10.3. Client and External Reporting Requirements

- Monthly PCG Report
- EPA/SSDA Auditor via project superintendent TSA Riley

11. Document and Record Management

Environmental project records are controlled and minimum records maintained include the following:

Category	Record	Responsible	Retention Timeframe
General Requirement	Environmental Management Plan (all versions), Including: • Performance Targets and Measurements • Contact and Service Provider Information	Project Manager	Permanent
	Site Diary – Site Manager / Foreman Inspection Records Training Records – Including Qualifications held by individuals All formal correspondence with stakeholders Meeting Minutes Complaint records Audit reports (including internal review reports) Weekly Environmental & Sustainability Check sheets Induction Records	Project Manager Site Manager Project Manager HR Manager Project Manager Project Manager Project Manager Environmental Coordinator	Permanent Permanent Permanent Permanent Permanent Permanent Permanent Permanent

Legislative / Regulatory	Identified Legislative Regulatory Register	Project Manager	Permanent
Approvals, Permits and Licenses	Any Approvals, Permits and Licenses	Project Manager	Permanent
External Review Reports	Not Applicable		
Construction Waste management	Waste tracking dockets Waste disposal receipts	Site Manager Site Manager	Permanent Permanent
Land Contamination	Not Applicable		
Hazardous Substance	Copies of MSDS's	Site Manager	Permanent
Corrective Action Request	Copies of issued corrective action / Action Required Notifications Log of corrective actions	Project Manager Project Manager Project Manager	Permanent Permanent Permanent
Incident reporting	Environmental incident reports Incident Investigation Reports	Project Manager Project Manager	Permanent Permanent
Performance Analysis / Evaluation Reports	Where available	Project Manager	Permanent

12. Subcontractor Management

Each subcontractor is selected on the basis of their ability to meet all specified requirements including Quality, Environment and Health and Safety. The following are examples of environmental documents which may be required from subcontractors:

- Toolbox talks and attendance registers
- Environmental Risk Assessment
- Project Risk Assessments
- Safe Work Method Statements (SWMS)
- Material Safety Data Sheets (MSDS)
- Hazardous Material Registers
- SQE information such as logbook, tests records etc., of all plant and equipment on site
- Competency Certificates and training records

Applicable subcontractors may also be required to submit a site-specific Quality, Environmental and / or Health and Safety Plan as determined by the Contract requirements and / or risks.

All subcontractors are to ensure they make appropriate environmental inclusions in their SWMS and abide by all statutory requirement mentioned in this EMP. All contractors will be required to attend a site induction, which will contain elements of this EMP.

Hindmarsh is to ensure SWMS are reviewed as per *SWMS Review*, and to ensure legislative / regulatory requirements are meet as per *Legal Register*. The *SWMS Engagement* shall be used to monitor that works are undertaken in accordance with SWMS. Contractors will be actively involved and monitored in *Weekly SQE Inspections* and *EIG Inspections*.

13. Project Specific Environmental & Sustainability Particulars

- SSD Compliance Reporting
  - Annual Compliance Report to DPHI
  - Compliance tracking against approval conditions
  - Published on project website if required
- Environmental Incident Notification
  - Immediate notification to DPHI of any material environmental harm
  - Written report within required timeframe (usually 7 days)
- Community Complaints Reporting
  - Maintain complaints register
  - Record response and resolution
  - Provide summary reporting in compliance reports
- Noise and Vibration Monitoring
  - SiteHive monitoring records maintained
  - Exceedances investigated and documented
  - Reporting where required under approval conditions
- Dewatering and Discharge
  - Water quality testing prior to discharge
  - Reporting to Council if discharge approval requires it
  - Records maintained for audit
- Contamination / Remediation
  - Validation reporting under the RAP
  - Site Audit Statement (if required)
  - Waste classification and disposal records
- Heritage
  - Notification to Heritage NSW if unexpected finds occur
  - Archaeological reporting if relics identified
- Tree Protection
  - Arborist inspections and reporting where required
  - Evidence of compliance with AS 4970

13.1. Existing Environmental Conditions of Site

The project site is an established hospital and health campus at 97–115 River Road, Greenwich, NSW. The site contains existing buildings, infrastructure, landscaped areas, and retained heritage elements within an urban residential setting and is located close to Gore Creek Reserve and the associated waterway.
Environmental investigations have identified localised potential land contamination, including hydrocarbon impacted soils and groundwater associated with historical site activities and existing or former infrastructure (see **Appendix A**).
A Remediation Action Plan has been prepared to manage known contamination, remediation works, validation, and the management of unexpected contamination during demolition and excavation (see **Appendix A**).
A Hazardous Building Materials Survey has identified the presence of asbestos containing materials and other hazardous building materials within existing structures across the site (see **Appendix B**). Due to the age and history of the site, there is also a high likelihood of asbestos containing materials being present within fill material in some areas of the site, which will require controlled management during ground disturbance works.
Ground conditions across the site are variable and include fill, residual soils, and bedrock. Groundwater may be encountered during excavation works and may be influenced by historical site conditions and proximity to Gore Creek (see **Appendix G**).
The site is located within a community sensitive area, surrounded by residential development and public land. Construction impacts such as noise, vibration, dust, traffic, erosion, and sediment runoff will require careful management to minimise amenity and environmental impacts (see **Appendix H**, **Appendix I**, **Appendix J**, and **Appendix K**).
Investigations indicate acid sulfate soils are unlikely; however, soils show variable pH and salinity conditions which may affect construction materials and landscaping (see **Appendix C** and **Appendix D**).

13.2. Dilapidation Report

Public Domain - Completed by Project Solutions PTL LIMITED on 24/02/2026
Internal (Pallister House & Surrounds) – 10/10/2024

13.3. Heritage / Cultural Considerations

The site includes the Pallister Building, a listed heritage item within the Greenwich Health Campus. No demolition, alteration, or intrusive works are proposed within the Pallister Building as part of Stage 2 works. The building will be retained and protected during construction.

A Heritage Impact Assessment has been prepared for the project and identifies the Pallister Building as the primary item of built heritage relevance to the site (see **Appendix L**).

An Aboriginal Cultural Heritage Assessment has been completed for the project and did not identify any Aboriginal objects or places within the Stage 2 construction footprint. No Aboriginal Heritage Impact Permit is required for the approved works (see **Appendix L**).

Measures will be implemented to prevent indirect impacts to the Pallister Building during construction, including controls on access, vibration, and adjacent works. An unexpected finds procedure will apply if previously unidentified heritage or Aboriginal cultural material is encountered (see **Appendix L**).

13.4. Geotechnical Report

Geotechnical investigations for the project were completed by JK Geotechnics, including an Additional Geotechnical Investigation (see Appendix E) and a Geotechnical Data Gap Investigation to address remaining uncertainty (see Appendix F).

The site includes fill, residual soils and Hawkesbury Sandstone, with ground conditions varying due to site levels, past development, and proximity to Gore Creek Reserve. Sandstone is expected to be encountered at varying depths during excavation works (see Appendix E).

Parts of the site include sloping and steep ground, particularly toward Gore Creek. Excavation works may require temporary support, benching, or retention to manage ground stability (see Appendix E).

Groundwater may be encountered during excavation, with levels varying across the site and influenced by rainfall, surface water, and proximity to Gore Creek. Any groundwater interaction or dewatering will be managed in accordance with the Dewatering Management Plan (see Appendix G).

Soils and groundwater may be mild to moderately aggressive to buried concrete and steel, which has been considered in the design (see Appendix E).

The Data Gap Investigation confirms that while ground conditions are generally understood, local variations remain, particularly in areas of deeper excavation. These risks will be managed through staged works, inspections, and ongoing geotechnical input during construction (see Appendix F).

13.5. Contamination / Remediation Report

Environmental investigations have identified areas of known and potential land contamination across the site associated with historical site activities, fill material, and existing or former infrastructure (see **Appendix A**).

Contaminants include petroleum hydrocarbons within soil and groundwater in localised areas. A former underground storage tank previously used for fuel storage has been identified on the site, with associated hydrocarbon impacts to surrounding soils and potentially groundwater (see **Appendix A**).

Due to the age and history of the site, there is a high likelihood of asbestos containing materials being present within fill material, in addition to asbestos identified within existing structures (see **Appendix A** and **Appendix B**).

A Remediation Action Plan has been prepared to manage known contamination, the former fuel underground storage tank, hazardous materials, and remediation works during demolition and excavation activities (see **Appendix A**).

Ground disturbance works will be undertaken in accordance with the Remediation Action Plan and applicable regulatory requirements. Validation of remediated areas will be completed where required (see **Appendix A**).

An unexpected finds procedure will apply if previously unidentified contamination, asbestos, or hazardous materials are encountered during construction (see **Appendix A**).

Additional Reports

Other additional reports include:
• Noise and Vibration Assessment – **Appendix N**
(B_Noise and Vibration Assessment.pdf)

• Arborist Report / Tree Pruning Specification – **Appendix O**
(S_Tree Pruning Specification.pdf)

• Social Impact Assessment – **Appendix P**
(A_Social Impact Assessment_01.09.23.pdf)

13.6. Project Specific Sustainability Initiative

No additional project specific sustainability initiatives apply to this project beyond those addressed within this Environmental Management Plan, the approved planning conditions, and the D&C Contract requirements.
Standard environmental controls, mitigation measures, and compliance obligations will be implemented in accordance with the approved EMP and associated management plans.

13.7. Environmental Management Sub-Plans

The following environmental management sub plans apply to the project and support the implementation of this Environmental Management Plan:

• Emergency Management Plan
• Waste Management Plan
• Green Star Management Plan
• Dewatering Management Plan
• Remediation Action Plan

These sub plans have been prepared separately where required and will be implemented and maintained in accordance with the D&C Contract, approved planning conditions, and relevant statutory requirements.

No additional environmental management sub plans are applicable to this project at this time.

13.8. Site Set up

Site accommodation and worker amenities will be provided in a staged manner to suit the construction sequence and site constraints.

During Stage SP1, a smaller site accommodation setup will be established to support early works, including demolition and bulk excavation. This setup will be sized to suit reduced workforce numbers and limited site access during early stages of the project.

During Stage SP2, a larger site accommodation compound comprising stackable modular buildings will be established in the vicinity of the Pallister Building. This compound will provide offices, meeting rooms, first aid, lunchrooms, and worker amenities appropriate to peak construction activities.

In the later stages of Stage 2 construction, worker amenities will be relocated into the basement of the Health Services Tower, reducing the extent of external temporary structures and improving site efficiency as permanent areas become available.

All site accommodation and amenities will be designed and installed to comply with applicable WHS requirements, NCC provisions for temporary structures, and project environmental controls. Measures will be implemented to manage energy use, water efficiency, waste, noise, and amenity impacts associated with site sheds and amenities.

The location and configuration of site accommodation may be adjusted as the project progresses to suit construction staging, site conditions, and programme requirements.

13.9. Storm Water / Rain Water

Stormwater during construction will include rainfall runoff, surface water, groundwater, and subsoil water generated by demolition, excavation, and dewatering activities. The site generally drains toward **Gore Creek Reserve**, and stormwater and groundwater will be managed to prevent offsite impacts.
Stormwater from disturbed areas will be controlled using erosion and sediment measures to prevent sediment laden runoff leaving the site. Clean water will be diverted away from work areas where practical.
Groundwater encountered during excavation will be managed in accordance with the Dewatering Management Plan (see **Appendix G**). Dewatering water will be collected, treated as required, and managed prior to discharge.
Where required, flocculation treatment and holding tanks will be used onsite to treat and store groundwater prior to controlled discharge, in accordance with approval conditions and discharge criteria outlined in the Dewatering Management Plan (see **Appendix G**).
Discharge of treated water will only occur where approved and in accordance with relevant requirements.
Stormwater and groundwater controls will be monitored and maintained throughout construction.

13.10. Land Use and Ecology

The site has been historically used as a health and hospital campus within an established urban area. Existing land uses include hospital buildings, infrastructure, access roads, and landscaped areas.

The site is not located on prime agricultural land, does not contain old growth forest, and is not within 100 metres of a wetland listed as being of high ecological value.

Vegetation and landscaped areas are present within and adjacent to the site, including interfaces with Gore Creek Reserve. Construction activities have the potential to impact vegetation and fauna habitat if not appropriately managed.

Vegetation protection and ecological controls will be implemented to minimise impacts during construction in accordance with approved arborist documentation and environmental management measures (see **Appendix O** and **Appendix P**).

13.11. Waste Management

Waste generated during demolition, excavation, and construction will be managed in accordance with the project Waste Management Plan (see **Appendix Q**).

Certified and appropriately licensed waste management contractors will be engaged to collect, transport, recycle, and dispose of waste streams in accordance with regulatory requirements. Waste contractors will be required to provide documentation confirming lawful disposal or recycling of materials.

Waste streams will be segregated at source where practical to maximise reuse and recycling. Dedicated bins will be provided for general waste, recyclable materials, and hazardous waste, with clear signage to support correct use.

Recycling performance will be monitored through waste contractor reporting and site inspections. Any contamination of waste streams will be addressed through corrective actions and toolbox discussions as required.

Hazardous waste, including asbestos containing materials and contaminated soils, will be managed separately by licensed contractors in accordance with the Remediation Action Plan and Waste Management Plan (see **Appendix A** and **Appendix Q**).

For appendices & supporting documentation – refer to the HammondCare Greenwich Aconex document register

Appendix A
Remediation Action Plan (RAP)
RAP_U_Remediation_Action_Plan_V1.pdf

Appendix B
Hazardous Building Materials Survey
HAZARD_V_Hazardous Building Materials Survey_V1.pdf

Appendix C
Acid Sulfate Soil Assessment
ASSA_X_Acid_Sulfate_Soil_Assessment_V1.pdf

Appendix D
Salinity Investigation
SALINITY_Y_Salinity_Investigation_V1.pdf

Appendix E
Additional Geotechnical Investigation
W_Additional Geotechnical Investigation.pdf

Appendix F
Geotechnical Data Gap Investigation
E32507BRrpt10 DRAFT Greenwich (DGI).pdf

Appendix G
Dewatering Management Plan
Dewatering Plan 32507PD5rpt2 Rev1 DMP Greenwich.pdf

Appendix H
Noise and Vibration Assessment
B_Noise and Vibration Assessment.pdf

Appendix I
Social Impact Assessment
A_Social Impact Assessment_01.09.23.pdf

Appendix J
Community Communications Strategy
Appendix J – 4587_FY25_PCW_Greenwich Community Communications Strategy_v3.pdf

Appendix K
Community Consultation Summary
Appendix S – Community consultation summary.pdf

Appendix L
Aboriginal Cultural Heritage Assessment Report
D_Aboriginal Cultural Heritage Assessment Report.pdf

Appendix M
Stage 1 Construction Environmental Management Plan
C13-(CEMP) HammondCare Greenwich – Construction Environmental Management Plan Rev D.pdf

Appendix N
Tree Pruning Specification / Arborist Report
S_Tree Pruning Specification.pdf

Appendix O
Stormwater Management Report
BB_Stormwater Management Report.pdf

Appendix P
Waste Management Plan
WMP_EE_Waste_Management_Plan_V1.pdf

Environmental and Sustainability Policy

Environment & Sustainability Policy

This policy applies to all Hindmarsh employees and contractors, including (without limitation) employees and contractors Hindmarsh Construction Australia Pty Ltd, HCA Queensland Pty Ltd, Hindmarsh Living Pty Ltd, Hindmarsh Corporate Pty Ltd and any other related entities at the date of this policy or at any other time.

Hindmarsh operates with full appreciation and awareness that environmental protection and sustainability are principle to our ongoing success. Operations are compassionate to the environment, the local community and aim to support the ongoing sustainability of the environment.

Compliance with this policy will be monitored, audited and continually reviewed so as to remain effective and aligned with all of our operations.

Rowan Hindmarsh
Chief Executive Officer

HINDMARSH

Hindmarsh Environmental & Sustainability Pledge

We seek to meet our own environmental needs and the needs and expectations of clients, stakeholders, employees and the community by:

- Setting and continually reviewing measurable environmental objectives and targets. Backed by ongoing monitoring, reporting and analysis supporting continual improvement. Complimented by ongoing feedback at all levels.
- Prevent pollution and unnecessary resource consumption by setting targets and maintaining systems and processes which seek to minimise construction related impacts including noise, vibration, groundwater, air quality, land contamination, amenity and heritage.
- Promote a shared sense of ownership and responsibility for optimal environmental performance from board through to employees and contractors, whilst developing a culture of environmental respect and appreciation.
- Encourage and support environmental awareness through ongoing training and development of competencies particular to specific environmental impacts related to individual activities.
- Comply with all legal requirements including environmental Legislation, Regulations, Codes of Practice, Applicable Australian and other standards specific to Hindmarsh.
- Implement and maintain the Hindmarsh Management System and its Environmental elements to ensure all potential aspects and impacts are identified, evaluated and suitably eliminated or controlled.
- Foster and support continuous improvement at all levels including the identification of key environmental initiatives.

WARNING - Uncontrolled when printed! Refer to COMPASS for the latest version.

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Maintained by: SQE
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