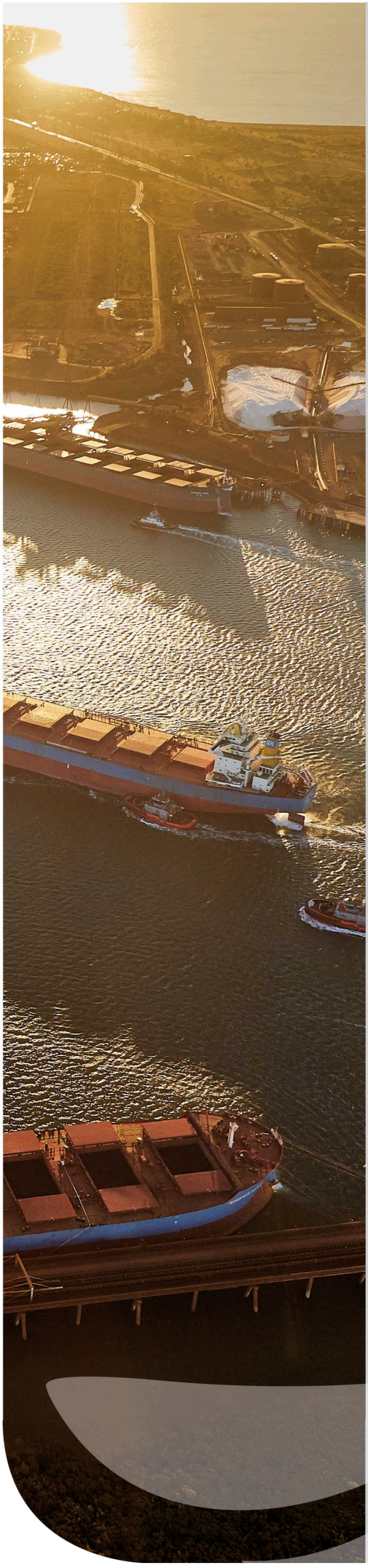

PILBARA PORTS AUTHORITY

GUIDELINES FOR PREPARING A CONSTRUCTION ENVIRONMENTAL PLAN

A334170

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1. INTRODUCTION

The purpose of this document is to clearly communicate Pilbara Ports Authority's (**PPA**) requirements for preparing a Construction Environmental Management Plan (**CEMP**).

A CEMP is a type of environmental management plan associated with a construction and/or demolition project. A CEMP should be a practical plan that communicates in a concise and clear way the key environment and heritage risks of the project and the proposed management to avoid or control these risks to a level that is as low as reasonably practicable.

An approved CEMP is a minimum requirement for any development to occur on PPA lands, seabed and waters. The term 'development' is used as per the definition provided in the PPA Port Development Guidelines available on PPA's website (https://www.pilbaraports.com.au).

A proponent is generally required to submit a CEMP at the Construction Application stage of the Development Approval process (i.e. well in advance of the development commencing). PPA's Environment and Heritage team will review all CEMP's, provide feedback and approve (if appropriate). It is important to note that development is not permitted to commence without a PPA approved CEMP in place.

2. CRITEREA FOR AN APPROVED CEMP

A CEMP will need to meet the following minimum criteria in order to be approved by PPA:

- **Site-Specific**: The CEMP demonstrates that the proponent understands the full range of environment and heritage risks associated with the development and has site specific controls to manage them. To ensure the CEMP addresses the management of site-specific issues, PPA encourages proponents to engage with those conducting the proposed works in the development of the CEMP (e.g. contractors and sub-contractors).
- **Clearly Communicated:** The risks and proposed site-specific management plans are clearly and concisely communicated and PPA agree on the management approach. Details on how the information in the CEMP will be communicated must be included within the CEMP.
- **Understood by 'Front Line':** The CEMP is prepared so that it can be easily read and understood by both technical and non-technical audiences. Most importantly, it must be able to be utilised by the front-line staff that are responsible for implementing the plan.

A CEMP template in Microsoft Word format is available on PPA's website, for use by proponents if required. Note that PPA will not reject a proponent's CEMP for the reason that it is not in the exact format and/or structure of the PPA's template. PPA may accept other management plan formats in place of a CEMP (e.g. Health, Safety and Environment Plan, Work Method Statement etc.) if it meets the intent and minimum information requirements of this Guideline.

PPA's Environment and Heritage team is available to assist proponents to develop a CEMP by helping to identify the site-specific key environment and heritage risks relevant to the work site(s) and offer applicable management measures for the planned activities within those sites. PPA encourages early engagement to ensure adequate time for assessment of the CEMP and advice to be provided, preventing the submission of unnecessary (or over-complex) information.

Unnecessarily lengthy, complex and/or non- site-specific documents are unlikely to be approved, nor are generic CEMP's that have no relevance to the specific work being proposed.

3. SIZE AND COMPLEXITY OF A CEMP

The size and complexity of a CEMP will be relative to the size and complexity of the proposed construction project and the potential impacts. For example, the installation of a portable office in a developed area would likely require a shorter management plan (<10 pages), while larger scale projects with more complex scopes and greater environmental risks would require a more detailed management plan (>10 pages).

4. KEY COMPONENTS OF A CEMP

A typical CEMP should consist of the following sections:

- A project description
- Roles, responsibilities and contact details of personnel involved in the project
- A description of how training, awareness and competencies will be delivered and assessed
- An assessment of environment and heritage risks and impacts
- Risk management plans to address all identified environment and heritage risks.

The information contained below offers guidance for developing each of these sections to the satisfaction of PPA.

4.1 Project Description

The project description should present a clear description of the proposed scope and project location, disturbance footprint of the development (including any laydown areas or office areas), timing of works and work methods, and be supported by a site plan. The following points can be used as a general guide for developing the project description:

Overview of the Project: Include a brief background to the project, including a description of why the construction is being undertaken.

Scope of Construction Works: Describe the full range of construction works and activities proposed (e.g. clearing of X hectares of land, placement of engineered rock fill, filter rock, geotextile fabric and armour rock; installation of piles; mucking out, drilling, pinning and grouting of piles etc.).

Construction (Disturbance) Footprint: Include a full description of the existing land and/or marine areas that will be disturbed by the construction works and those immediately adjacent.

Timing of Works: Provide a description of both the total duration of the works and the time of year they are planned to occur. The latter would include consideration of the expected climate during this time (e.g. anticipated rainfall and/or cyclone events, wind direction and speeds).

Work Methods: Provide a summary of proposed construction methods intended for the construction project. This will allow PPA to assess against the identified environment and heritage risks and ensure adequate controls are included in the risk management plans.

Site Plan: The project site plan should clearly show the full extent of the proposed works area of the construction project. This would typically include a map detailing the full construction boundary (including locations of laydown areas and temporary offices and facilities) and disturbance footprint marked clearly over a current aerial photograph and include the locations of all construction activities (e.g. constructions sites, laydown areas etc.). It would also include site-specific information including the location of waterways or vegetation to be protected, national heritage listed areas, or the location of sediment and erosion traps. PPA can provide a current aerial photo of the works area on request. An example site plan is included in Attachment A.

4.2 Roles, Responsibilities and Contact Details

This section should nominate the people both responsible for, and involved with the implementation of the CEMP including, but not limited to:

- Project Manager;
- Site Supervisor / Manager;
- Environment Officer;
- HSE Representative;
- Project Engineer; and
- Contractors and sub-contractors.

4.3 Training, Awareness and Competency

The CEMP should outline how environmental training and awareness will be delivered and how competency will be assessed throughout the project, to ensure the CEMP is communicated to the project team and all contractors and sub-contractors. Examples of delivery methods include, but are not limited to:

- Site environmental inductions, with assessment;
- Project kick-off meetings;
- Daily pre-start meetings;
- Tool-box meetings;

- Incident bulletins; and
- Environmental bulletins

4.4 Environment and Heritage Risk Management

The environment and heritage risk management section of a CEMP should present a summary of the key environment and heritage risks and potential impacts relevant to the proposed construction project. The proponent should identify these through a project risk assessment or (for smaller projects) by developing a job hazard analysis for specific task(s).

PPA encourages proponents to engage with the PPA Environment and Heritage team early during this project risk assessment process. Preferably, this will be in the form of a face-to-face meeting on the proposed construction site. This process will help to ensure the CEMP includes all site-specific risks and is as concise as possible

A summary table identifying all activities and potential environmental impacts should be included in this section, with reference to the relevant risk management plan within the CEMP.

- Below are several examples of environmental risks that may be associated with a construction project:
- Introduced marine pests
- Noise (including underwater noise)
- Dust
- Erosion
- Pollution of lands or waters from oil and other noxious substances
- Litter and waste
- Impact on native fauna
- Unauthorised clearing of native vegetation
- Spread of weeds

Some key themes that should be considered when assessing environmental risks of a construction project on PPA lands or waters include, but are not limited to:

4.4.1 Ambient Air Quality

Ambient air quality refers to odour, dust and other particulate emissions, such as emissions from vessels and vehicles. Sources may include:

- Dust from land clearing, excavation works or material stockpiling;
- Dust from abrasive blasting;
- Dust from vehicles using unsealed roads; and
- Emissions from the use of heavy machinery and/or construction vessels.

The project's proximity to residential areas and/or prescribed premises will influence the level of control required, as emissions may impact on environmental health and in some circumstances, are regulated by the Department of Water and Environmental Regulation (DWER). PPA encourages proponents to contact the Environment and Heritage team to determine what level of control may be required for a planned project. Some minimum dust management strategies may include:

- Use of water and/or other dust suppression;
- Full encapsulation of all abrasive blasting operations;
- Planning of works known to generate dust around favourable weather; and

Stopping works if excessive emissions are leaving the worksite.

Note that PPA has a permit system in place for all abrasive blasting activities. The permit application procedure can be found on PPA's website (www.pilbaraports.com.au).

4.4.2 Cultural Heritage

PPA's Environment and Heritage team is the first point of contact for any queries relating to cultural heritage matters within PPA lands. Proponents are strongly encouraged to discuss cultural heritage matters with PPA in the early phases of a project, such that any issues can be effectively managed in a timely manner.

PPA lands contain a large number and diversity of cultural heritage values. These can include petroglyphs (rock art), shell middens, artefact scatters, stone arrangements, historic and maritime archaeological sites. Such sites are mostly encountered in the undeveloped or natural portions of PPA's lands.

There are, however, some cultural heritage sites that have been retained in or immediately adjacent to developed areas. Proponents should take care to ensure they understand where these sites are located and outline this (where relevant) in the CEMP. PPA can provide proponents with a map or aerial photograph showing known cultural heritage sites, as they appear in the databases of PPA and regulatory authorities. It is expected that the proponent would also identify appropriate measures to avoid and protect these areas in the CEMP.

It should be noted that PPA's Environment and Heritage team restricts access to all undeveloped areas of PPA land in the Port of Dampier (i.e. any natural areas). Should access be required to any of these areas or if proponents are unsure of the boundary, you are required to seek approval

from PPA's Environment and Heritage team. Please note that the team may ask that you (and your team) be escorted whilst in these areas.

PPA does not permit the use of paint or other permanent marking techniques to mark natural rock surfaces in undeveloped areas. This practice is not considered appropriate in the cultural heritage context of the Pilbara region.

Where direct impact to a cultural heritage site is required as part of a project, PPA will request a proponent to develop a project specific Cultural Heritage Management Plan. Impacts to heritage sites will need to be undertaken in consultation with PPA and other relevant stakeholders, such as Traditional Owners, with the appropriate approvals from regulatory authorities.

PPA's Cultural Heritage Management Plan is available on PPA's website (www.pilbaraports.com.au) and must be considered in the development of any project specific Cultural Heritage Management Plan.

4.4.3 Dangerous Goods and Hazardous Substances

The storage, handling and use of dangerous goods and hazardous substances should be done in accordance with relevant legislation (e.g. *Dangerous Goods Safety Act, 2004*) and associated regulations, Australian Standards and Codes of Practice.

When working with any volume of hydrocarbon, chemical or other environmentally hazardous materials, consideration should be given to ensure that:

- There is adequate bunding on site, both during storage and use
- Where fixed bunding is not practical, and self-bunding is not available, sufficient mobile bunds and/or drip trays to be made available on site
- Bunding is sufficient for the volumes being stored and used, and for the location of use (i.e. landside or marine)
- Adequate spill response equipment is available and sufficient personnel are trained and competent in its use
- All personnel are made aware of site-specific emergency contact details in the event of a landside and/or marine spill.

Note that landside operations under the direct control of PPA have additional spill response capabilities that may be utilised by proponents. PPA encourages proponents to discuss with PPA Landside Operations and/or Marine Operations if construction projects have the potential to require these resources.

All spills should be reported to PPA immediately, to ensure timely external reporting (where applicable). Where a spill results in material entering the harbour, proponents will also be required to submit a POLREP to the Department of Transport.

4.4.4 Unexpected Finds

Excavation, earthmoving, blasting and quarrying have the potential to unearth additional risks not previously anticipated such as contamination or items of cultural significance which need to be assessed and managed appropriately. To this effect, an Unexpected Finds process (or parallel procedure) should be incorporated into an approved CEMP to ensure any unexpected environment or heritage risks are appropriately managed. The process should also include immediate notification of PPA's Project Manager where Unexpected Finds are encountered.

4.4.5 Fauna

All construction projects should be managed to minimise impacts to native fauna and prevent the spread of introduced species. Proponents should consider controls aimed at preserving habitat, minimising interactions with wildlife, maintaining good housekeeping to discourage wildlife from entering the work site and ensuring personnel are aware of wildlife carer and veterinarian contact details, should the need arise.

Biosecurity in Western Australia is managed under the *Biosecurity Act 2015,* and *Biosecurity Regulation 2016* which provides for the control of certain terrestrial and marine organisms. PPA has obligations under this legislation to monitor for, and report, declared pests to the regulator.

Proponents should consider controls relevant to their projects, which ensure there is a low risk of introducing terrestrial and/or marine pests onto PPA lands or into waters, such as:

- Site inductions and other awareness training;
- Vehicle inspections prior to mobilisation to site;
- Applying and inspecting approved antifouling paint;
- Dry-docking and cleaning high risk vessels;
- Engaging an approved vessel inspector for high risk vessels; and
- Management of ballast water (if any) in accordance with the Australian Department of Agriculture and Water Resources ballast water requirements.

All non-trading vessels and associated immersible equipment should undertake a marine pest risk assessment. Information can be found on PPA's website (www.pilbaraports.com.au), including mandatory requirements for non-trading vessels seeking to operate at the Port of

Ashburton (refer to the Port of Ashburton *Vessel Biofouling Risk Assessment and Management Procedure*[1]). A key consideration of this process is to ensure all construction vessels have been approved by PPA **prior** to entering PPA waters. PPA recommends starting the process well before departing for your destination port, as the process involves consultation with the Western Australian Department of Primary Industries and Regional Development (DPIRD) and requires sufficient review time.

DPIRD's website (www.dpird.wa.gov.au) also contains resources available relating to introduced marine pests, including a list of nationally listed species and species of concern to the protection of Western Australia, which may be spread via biofouling or ballast water exchange.

All native fauna injuries or deaths (terrestrial and marine) should be reported to PPA immediately, to ensure timely external reporting (where applicable).

4.4.6 Flora and Vegetation

In Western Australia, all native vegetation is protected under the *Environment Protection Act 1986.* A native vegetation clearing permit from the Department of Water and Environmental Regulation is required to trim, disturb or remove vegetation in any way shape or form.

PPA holds several native vegetation clearing permits that cover a wide area and range of activities on PPA lands.

If a proposed development was to require clearing of native vegetation, the proponent may be able to work under an existing permit, where one exists, however, the proponent would be required to seek prior written approval from the PPA Environment and Heritage team in order to do so. The project CEMP would need to include a reference to the permit, and a description of how the proponent will comply with permit conditions.

PPA's Environment and Heritage team can provide a marked up aerial photograph that shows the bounds of these permits as it relates to the proposed construction project.

Any incident of clearing outside of a permit should be reported to PPA immediately, to ensure timely external reporting (where applicable).

[1] Available at: https://www.pilbaraports.com.au/ports/port-of-ashburton/environment-and-community/statutory-environmental-approvals-and-permits

4.4.7 General Housekeeping

A key source of roadside litter in the Pilbara is loose items on vehicle loads that have not been properly secured or stowed.

Roadside litter can be washed or blown into the marine environment during storms and cyclone events. Apart from the obvious environmental impacts these items can have in coastal marine areas, plastics and other debris can present a serious hazard to vessels operating in the Port.

Roadside litter also presents a poor image and safety hazard to visitors and workers in the area. PPA and its stakeholders have a vested interest in ensuring roads present a clean, safe image to their customers and the local community.

All CEMP's should consider to some extent the management of vehicle loads in their general waste management processes. Pre-start vehicle checklists, site inductions, toolbox talks and regular secure load inspections of vehicles would all help to tackle the behaviors that are driving this issue.

4.4.8 Soils and Sediments

Management of land extends to consideration of controls when working within known contaminated sites, for preventing new contamination and for managing sediment movement and erosion.

In Western Australia, contaminated sites are managed under the *Contaminated Sites Act 2003*. The legislation provides several levels of contamination to be recorded for 'sites'.

While most of PPA's land areas are generally free of soil contamination issues, some land parcels are currently classified under the *Contaminated Sites Act 2003*.

This listing means PPA carefully assesses and manages all excavation and movement of soils sourced from its lands. PPA may require the proponent to conduct prior sampling and analysis of any soils to be excavated and moved from or within the proponent's lease or development area. This is part of PPA's due diligence process as landholder and ensures PPA's compliance with contaminated sites legislation.

PPA has an excavation permitting system in place, which details specific controls which much be implemented when working within PPA's listed sites and the *Contaminated Sites Act 2003*. The permit and associated procedure can be found on PPA's website (www.pilbaraports.com.au).

Material excavated from PPA lands classified as *'Potentially Contaminated'* or *'Contaminated'* under the *Contaminated Sites Act 2003,* is required to

dispose of at a waste facility appropriately licensed to take it. Prior to this occurring, it is PPA's expectation is that the proponent shall:

- Obtain an excavation permit from PPA. When applying for a permit, the proponent should include a map or plan clearly illustrating the location from which the soil will be excavated from and depth(s) of excavation;
- Implement the soil sampling and analysis plan detailed within the permit (these methods meet the requirements of the *Guidelines for Landfill Waste Classification and Waste Definitions 1996 (as amended 2018)*; and
- Issue a copy of the analytical results, an accompanying summary report and photos to PPA's Environment and Heritage team for review, as per the conditions of the excavation permit.

If you are unsure if your works exist within a site that is currently classified, please contact the PPA Environment and Heritage team, who can provide you with a map.

To ensure the effects of erosion and sedimentation on the environment are minimized, proponents should consider controls which allow for minimal soil disturbance and run-off from site. Some controls may include, but are not limited to:

- Ensuring all works are conducted within the approved work zone;
- Restricting vehicles to designated roads/tracks;
- Ensuring stormwater run-off drains into site, and when this is not possible, ensuring run-off is directed via the longest flow path possible to ensure maximum sediment retention;
- Utilisation of sediment controls, such as rock dams, sediment basins, sediment fences and silt rocks; and
- Regular inspection and maintenance of sediment controls.

4.4.9 Noise Emissions

Environmental noise refers to noise pollution from domestic, commercial and/or general industry (including construction) and is regulated under the *Environmental Protection (Noise) Regulations 1997*. Environmental noise is concerned with the impacts of a site on the surrounding areas and includes vibration of any frequency.

Proponents are encouraged to refer to the noise regulations to determine if their works will occur close to any noise sensitive premises, and to review the assigned noise levels relative to the premises likely to receive noise.

Underwater noise emissions from piling or other marine construction activities may impact marine fauna (i.e. whales, dolphins, dugongs and turtles) and should be monitored accordingly.

To ensure noise emissions do not exceed assigned levels or adversely impact marine fauna, proponents should consider controls aimed at reducing the amount of noise-emitting equipment onsite, and effective monitoring of exclusions zones. Some controls may include, but are not limited to:

- Comply with PPA Noise Management Plans (where applicable);
- Restricting piling works to approved days (check with PPA to confirm approved days);
- Conduct visual observations of exclusion zones to ensure no marine fauna are present during marine construction activities;
- Regularly maintain and conduct pre-starts for all equipment;
- Utilise noise-dampening equipment (where practical);
- Record all noise complaints, and report to PPA;
- Undertake construction activities in accordance with all statutory approvals (either held by proponent or PPA, where applicable); and
- Undertake construction activities in accordance with *AS2436-1981 Guide to Noise Control on Construction, Maintenance and Demolition Sites.*

4.4.10 Waste

Waste management extends to both waste generation and strategies for managing various waste streams. Proponents should consider the types of wastes that will be generated during a project and implement controls to ensure waste streams are effectively managed. Some consideration should be given to:

- Provision of adequate waste bins on site (i.e. volume, quantity etc.);
- Recycling of general waste streams (e.g. paper, plastic, metals etc.);
- Reducing waste generation potential (e.g. substitute common throw away items with reusable alternatives);
- Securing vehicle loads to prevent roadside litter;
- Validation of abrasive blasting waste composition (including coating removed);
- Disposal requirements for controlled wastes (see *Environmental Protection (Controlled Waste) Regulations 2004*);
- Sampling methods where validation of waste composition is required (e.g. when working on lands listed as contaminated); and
- Collection of all waste tracking records as audit evidence.

PPA's abrasive blasting permit and excavation permit processes offer additional guidance on blasting and/or excavating within PPA lands. Both are available on the website (www.pilbaraports.com.au).

4.4.11 Water Quality

Any works on or near the marine environment have the potential to degrade the quality of PPA waters and the surrounding coastal marine environment. These activities may include, but are not limited to:

- Dredging, piling, drilling, surface levelling and/or any other in-water activity that could increase turbidity;
- Abrasive blasting over water (e.g. on or under berths) where the risk of spills to harbour are present;
- Use of generators, storage and handling of hydrocarbons and other hazardous substances (e.g. paint) on or near water (e.g. berths, barges, etc.); and
- Landside or marine-side works which create wastewaters.

Proponents should consider control measures aimed at reducing the likelihood of spilling materials into the harbour and reducing turbid plumes. Some controls may include, but are not limited to:

- Marine sediment sampling prior to seafloor disturbance activities;
- Plume modelling prior to commencing the project;
- *In situ* turbidity monitoring (against pre-approved/conditioned trigger values);
- Management of waters running off site to capture sediments and minimise sediment and chemical laden water from entering the marine environment;
- Operate within relevant statutory approvals (where applicable);
- Operate in accordance with relevant dredge management plans (where applicable);
- Operate during daylight hours only; and
- Utilise mobile bunding where appropriate.

4.5 Risk Management Plans

For each environment and heritage risk area identified, a risk management plan detailing how the risks will be managed should be prepared to clearly demonstrate how a proponent intends on managing identified risk.

The preferred format for risk management plans is in table form, however proponents may wish to present these management plans in a format that is more familiar to their contractors and sub-contractors (e.g. a Job Hazard Analysis).

PPA will accept any format, as long as the following minimum criteria are sufficiently covered, relative to the scope of the proposed works:

- Objective(s)
- Management Strategy
- Controls
- Responsible person undertaking the controls
- Timing for completing controls
- Performance indicators
- Reporting and/or monitoring requirement(s)
- Corrective actions

An example of a risk management plan is included in Appendix B.

4.6 Incident Reporting

All environmental incidents as a result of the activity/s specific to this CEMP and its associated works must be managed in accordance with PPA's Incident Management Procedure. This includes submission of an online report via PPA's online incident reporting system within 24 hours of the incident occurring.

The following incidents must be immediately reported to the designed PPA project manager / contact (without delay):

- Release / spill of contaminants (e.g. fuels / chemicals / sewage) to land;
- Release / spill of contaminants (e.g. fuels / chemicals / sewage) of any amount to the marine environment – note this must immediately be reported to PPA Vessel Traffic Services (VTS) for the relevant Port;
- Release / spill of contaminants (regardless of volume) that leave the construction / work site (e.g. enter a stormwater drain);
- Any environmental complaints received as a result of activities associated with construction;
- Non-compliance with this CEMP, or any other development or environmental approval obtained in relation to activities associated with construction; and
- Unexpected finds.

5. IMPLEMENTATION OF A CEMP

Once a CEMP is approved by PPA, it should be fully implemented by the proponent and integrated into construction site management, as per the standard environmental conditions in PPA's commercial agreements.

PPA's Environment and Heritage team will conduct regular site inspections of the construction works to verify compliance with the approved CEMP. The intent of these inspections to ensure the proposed controls are being effectively implemented and that learnings arising during the construction program are fed back into the review of the CEMP (where required) and transferred to subsequent projects.

6. KEY PILBARA PORTS AUTHORITY CONTACT DETAILS

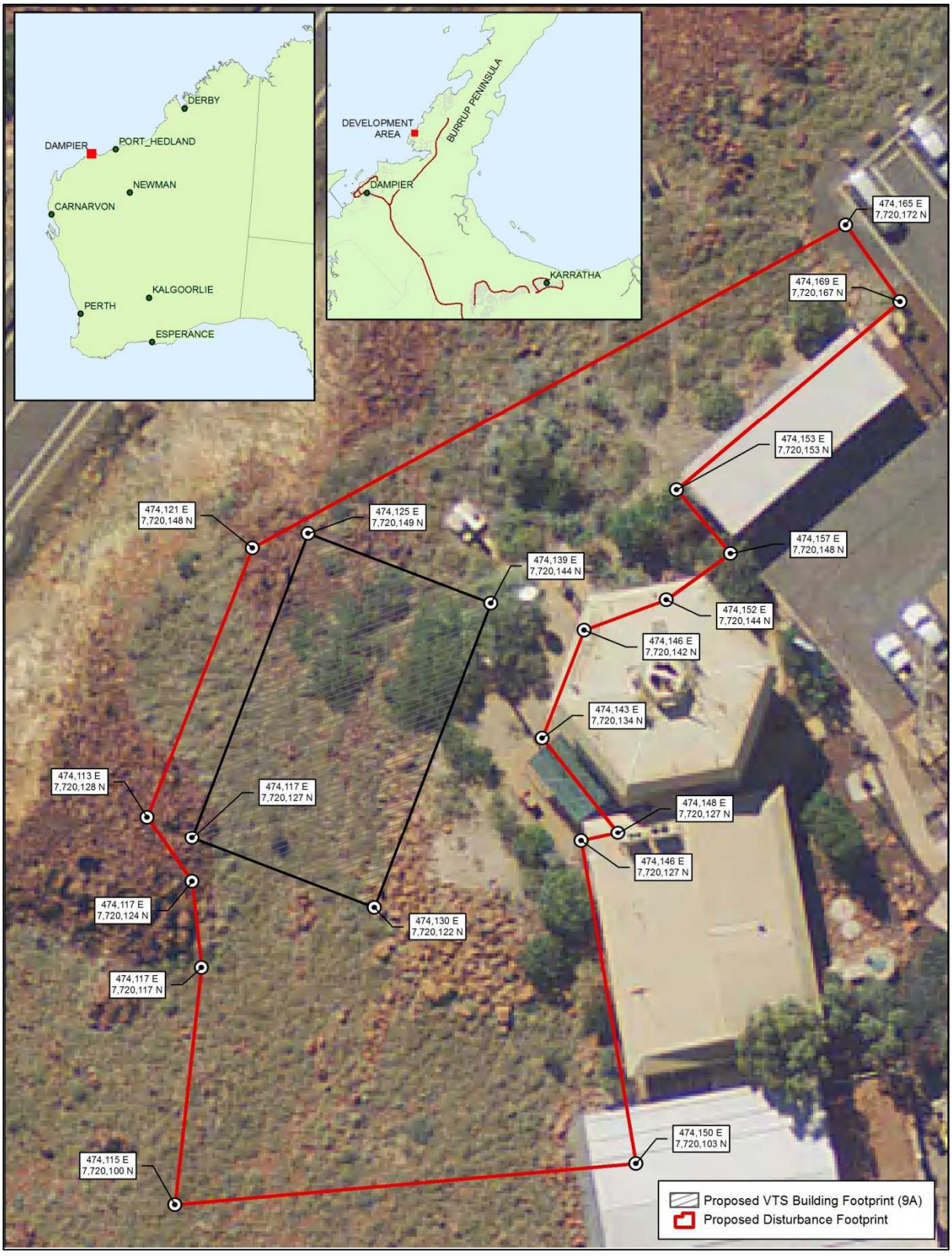
PORT	DEPARTMENT	CONTACT DETAILS
Ashburton / Dampier	Environment and Heritage	Ph: 9159 6555 (PPA Switch) Environment.WestPilbara@pilbaraports.com.au
	Landside Operations	Ph: 0427 770 859 (Duty Wharf Manager) WharfManagers@pilbaraports.com.au
	Dampier Vessel Traffic Services	VHF 11 (Port vessel working channel) VHF 16 (Port vessel emergency channel) (08) 9159 6556 (landline telephone) 0428 888 800 (24 hour emergency mobile telephone). Dampier.VTS@pilbaraports.com.au
Port Hedland	Environment and Heritage	Ph: 9173 9064 Environment.PortHedland@pilbaraports.com.au
	Landside Operations - East	Ph: 9173 9077 Landside.OperationsEast@pilbaraports.com.au
	Landside Operations - West	Ph: 9173 8901 Landside.West@pilbaraports.com.au
	Marine Operations – Vessel Traffic Services	Ph: 9173 9030 UHF Channel 12 and 16 Tower.Control@pilbaraports.com.au
	Marine Operations – General	Ph: 9173 9015 Shipping.PortHedland@pilbaraports.com.au

7. PROCESS OWNER

The Director Environment is responsible for this document.

Date approved:	7 August 2020	Review date:	7 August 2022
Version:	5	Approved by:	Director Environment and Heritage

APPENDIX A – EXAMPLE SITE PLAN



APPENDIX B – EXAMPLE RISK MANAGEMENT PLAN

DUST MANAGEMENT			
Objective(s)	To ensure the impacts of dust on adjacent areas and the community are minimised.		
Management Strategy	Dust issues managed principally by emission controls at source, and administrative controls during works.		
		Responsibility	**Timing**
Control(s)	Area to be disturbed minimised. Clearance lots to be approved by Project Manager. Where dust is identified as an issue, dust control measures will be implemented. These will primarily be the use of water carts, but may include surface treatments. Vehicle movements controlled (Traffic Management Plan) and kept to established tracks and haul roads. Dust awareness issues in environmental induction process		
Performance Indicator(s)	No complaints from adjacent commercial premises and/or community.		
Monitoring	Daily inspection of works sites to occur, including: visual check for dust crossing the site boundaries visual check of high potential dust areas, such as haul roads, stockpiles and operational areas.		
Reporting	Any complaints or incidents to be reported to PPA project manager.		
Corrective Action(s)	Investigate cause of excessive dust Implement controls immediately (e.g. water carts) Implement corrective measures prior to the recommencement of site works Implement administrative controls if required, such as rescheduling of dust generating activities to more favourable weather conditions.		