

Six Mile Creek Dam Safety Upgrade Project

Site Environmental Management Plan

Document No: LMDIP-10000-GNL-ENV-MPL-00002

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Abbreviations

Abbreviation	Meaning
AHD	Australian height datum
AMS	Activity Method Statement
CAR	Corrective Action Register
CCM	Contractor Commercial Manager
CEMP	Construction Environmental Management Plan
CGER	Coordinator-General's Evaluation Report 2019
CGCR	Coordinator-General's change report – Construction 2025
CM	Contractor Construction Manager
CSM	Contractor Commercial Manager
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DWATSIPM	Department of Women, Aboriginal and Torres Strait Islander Partnerships and Multiculturalism
DETSI	Department of Environment, Tourism, Science and Innovation
DNRMMRRD	Department of Natural Resources and Mines, Manufacturing, and Regional and Rural Development
DPI	Department of Primary Industry
EMS	Environmental Management System
Eng	Engineer
EP Act	<i>Environmental Protection Act 1994</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ESM	Contractor Environment and Sustainability Manager
FSL	Full supply level
HSEQ	Health, Safety, Environment and Quality
HSM	Health and Safety Manager
IAR	Impact Assessment Report
NATA	National Association of Testing Authorities
OH & S	Occupational Health and Safety
SEMP	Site Environmental Management Plan
SDS	Safety Data Sheet
TRA	Task Risk Assessment
WoNS	Weeds of National Significance
WRA	Workplace Risk Assessment
WSC	Worker Start Cards

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1. Introduction

1.1. Background

The Lake Macdonald Dam is one of several dams across Southeast Queensland to be upgraded as part of Seqwater's Dam Improvement Program. Seqwater is responsible for the ongoing safety of the Dam and with a growing population downstream, there are more people at risk in the extremely unlikely event of a dam failure.

The Lake Macdonald Dam Improvement Project (the Project) will be the first major upgrade of the dam since it was built in 1965, and the walls were raised in 1980. The upgrade is a critical project in Seqwater's Dam Improvement Program and must result in a dam structure compliant with the legislative requirements of the *Water Supply (Safety and Reliability) Act 2018* and the *Queensland Dam Safety Guidelines*.

While the upgrade will demolish the existing dam, delivering a new dam in its place, critical to its success will be the effective management of creek inflows, sensitive aquatic fauna and the interfacing local community. This important upgrade and spillway and embankment reconstruction will not only provide essential earthquake and flood protection but improve water supply certainty for the entire Sunshine Coast regional network.

The Coordinator-General approved the Project Impact Assessment Report (IAR), and recommended the Project progress, subject to conditions and recommendations included in the Coordinator-General's Evaluation Report (CGER) released 20 May 2019. Since then the project has undergone significant changes to the approved Project including:

- an increase in construction duration from 2.5 to 5 years
- design changes to the temporary coffer dam
- maintenance of the lake at 42% of the Full Supply Level (FSL), as opposed to the 5% previously proposed

These changes required the project to submit a change report to the OCG for review and approval. Therefore this Site Environmental Management Plan (SEMP) has been prepared to address the relevant imposed conditions outlined in the Coordinator-General's change report – Construction (CGCR) 2025.

The changes relate only to the construction phase of the Project with no change to the proposed operation of the dam once commissioned.

The key Project elements are unchanged and remain:

- staged and temporary lowering of the dam's water level
- construction of a temporary sheet pile coffer dam
- decommissioning and demolition of the existing spillway and embankments
- construction of a temporary concrete batching plant
- construction of the replacement spillway in the current dam footprint with new structure built to modern safety standards with the same capacity and area
- reconstruction of the right and left embankments

1.2. Scope

The Project involves removing and replacing the Six Mile Creek Dam spillway and embankments to improve the safety and performance of the dam and meet current Queensland dam safety regulations.

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The new dam will have the same storage volume and full supply level as the existing dam. The Project includes delivery of the following scope items:

- Staged Reservoir Lowering of the Lake Macdonald storage (to min level of 93m AHD) and manage the level of the reservoir during the construction of the Dam Upgrade works
- Fish salvage and relocation operations to minimise harm to aquatic fauna during the lake lowering and throughout the construction works
- Temporary works to manage the storage level and catchment inflows during construction
- Demolition of the existing spillway structure and a section of the right embankment
- Construction of a low-level sheet pile cofferdam and hardstand working platform to protect the site
- Construction of concrete cells for the foundations of the new spillway using contiguous reinforced concrete secant piles through the weak alluvial material on the site into the underlying sandstone rock
- Excavation of the material within the concrete cells down to hard rock before filling the concrete cells with mass concrete to form the foundation of the new labyrinth spillway structure and the side walls supporting the side embankments
- Construction of a new spillway
- Construction of new embankments (dam walls) on either side of the new concrete spillway to form the new dam and incorporating engineered filter zones to manage seepage through the embankments, including ground improvement works, and a low strength concrete cut off adjacent to the new concrete structures to increase foundation strength and manage seepage through the foundation under the new embankments
- Provision of new outlet works structures to enable environmental releases and emergency dewatering of the dam
- Construction of a new saddle dam to the east of the Noosa Water Treatment Plant along the alignment of Collwood Road to prevent extreme floods breaking out of the storage basin.
- A temporary concrete batching plant is proposed on-site to deliver the anticipated 38,000 cubic metres of mass concrete required for construction of the spillway foundation. The batching plant will be de-commissioned and removed following completion of spillway concrete works.

Once construction of the new spillway and embankments is complete, the site work area and recreational facilities will be reinstated. It is anticipated that Lake Macdonald will return to its FSL within the first 12 months after construction, subject to rainfall.

The new dam will have the same storage volume and FSL as the existing dam (FSL to RL 95.32 m AHD), and operations of the upgraded dam will be similar to those for the existing dam.

This management plan sets out the roles and responsibilities, mitigation measures, and stakeholder engagement processes to manage the activities described above. The Project works footprint is provided in Figure 1.

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1.3. Proposed Timing and Duration

Project works, commencing with lake drawdown, are anticipated to commence in March 2025 with demobilisation and site reinstatement anticipated to complete in Q2 2029 (weather permitting). The proposed Project activity schedule is shown in Table 1.

Table 1: Proposed Project program

Activity	2024	2025	2026	2027	2028	2029
Contract award and early works						
Lake drawdown						
Establish concrete batch plant						
Coffer dam construction						
Decommissioning of spillway						
Construction of new spillway						
Remove cofferdam						
Commissioning						
Demobilisation and reinstatement						

The works will be undertaken with the Project approved construction hours outlined in Table 2.

Table 2: Project hours of construction

Work Period	Time
Standard hours	Monday – Friday 6:30 am to 6:30 pm Saturday 6:30 am to 4:00 pm
Non-Standard hours – day/evening	Monday – Friday 6:30 pm to 10:00 pm Saturday 4:00 pm to 10:00 pm Sunday All day
Non-standard hours – night-time	Monday – Sunday 10:00 pm to 6:30 am

The proposed working hours required for each work element is summarised in Table 3.

Table 3: Summary of work activities and proposed construction periods

Activity	Proposed Period		
	Day	Evening	Night
Clearing and grubbing	Yes	No	No
Site gravel road construction	Yes	No	No
Cofferdam vibration sheet piling	Yes	No	No
Cofferdam rock fill	Yes	Yes	No
Reservoir lowering	Yes	Yes	Yes
Dam crest demolition & excavation	Yes	Yes	Yes
Spillway demolition & excavation	Yes	Yes	Yes
Concrete batching & pouring activities	Yes	No	Yes
Other dam construction activities	Yes	No	No

1.4. Objectives

This Site Environmental Management Plan (SEMP) specifies the requirements that Seqwater on the Lake Macdonald Dam Improvement Project (the Project) will use to enhance its environmental performance and comply with environmental requirements, in particular with the Coordinator General's Report (CGCR) and *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval.

This SEMF has been prepared to:

- Meet the requirements of the Coordinator General's Evaluation Report (CGCR), specifically Imposed condition Schedule 1 – Condition 1
- Be generally in accordance with the draft EMP provided in Appendix B of the IAR
- Provide a framework for the delivery of the Project in accordance with good environmental practice. As such the project's Principal Contractor must produce a Construction Environmental Management Plan (CEMP) in accordance with this SEMF.

The specific objectives of this SEMF are to:

- Minimise and manage environmental impacts associated with the Project
- Ensure compliance with environmental legal requirements and obligations
- Provide ongoing environmental performance review and compliance monitoring

The intended outcomes of this SEMF include:

- Enhancement of environmental performance on the Project for Seqwater, the environment, and the community
- Fulfilment of the Project's compliance obligations
- Achievement of the Project's environmental objectives

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1.4.1. Performance Measures

High level performance measures relevant to the implementation of this SEMP are detailed in Table 4.

Table 4: Hight level performance measures

Performance Measure	Measurable Target(s)
Compliance with all permits and approvals	All required approvals are obtained prior to Project works commencing
	All required EMPs are developed and approved prior to Project works commencing
Maintain water quality within and downstream of the construction footprint	No unplanned releases or discharges of contaminants to water
	No discharge of construction affected water to the Noosa Water treatment Plan Supernatant Lagoon
	A best practice Erosion and Sediment Control Plan (ESCP) shall be developed prior to the removal of vegetation and disturbance of soil
Minimise Project impacts on flora and fauna	No exceedance of vegetation clearing and disturbance limits
	Vegetation clearing does not significantly impact EPBC Act listed threatened species and threatened ecological communities
	Finalise and implement the Lake Macdonald Water Lowering Flora & Fauna (Dewatering) Management Plan
Minimise impacts caused by construction lighting	No community complaints regarding light nuisance
	No observable light impacts on nocturnal processes of light sensitive of fauna habitat
Minimise impacts associated with Project noise and vibration	No complaints or community concerns regarding noise and/or vibration
	Compliance with construction hours provided in Table 2
Prevent adverse environmental impacts from hazardous substances and dangerous goods	No environmental incidents resulting from mismanagement of hazardous substances and/or dangerous goods
	Containment and effective clean-up of all spills involving materials that may cause environmental harm, and measures taken to prevent the incident from recurring
Avoid or minimise adverse impacts to Aboriginal and non-Aboriginal cultural heritage	Compliance with the cultural heritage duties of care
	All unexpected finds recorded, reported, and managed
	No complaints from community and/or stakeholders

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Performance Measure	Measurable Target(s)
	No Project activities occur in exclusion areas
Effectively control pests, weeds, and disease	No spread of existing pests, diseases, declared/listed weeds or Weeds of National Significance (WoNS)
	No introduction of new populations/species of pests, diseases and declared/listed weeds
Minimise waste generated by Project activities	All waste is disposed of lawfully, with documentation for trackable waste
	Implementation of waste management hierarchy onsite (reduce, re-use, recycle, disposal)
	No disposal of recyclable and/or reusable material to landfill
Minimise emissions from the Project	No exceedance of airborne dust concentrations at sensitive receptors
Minimise risk of contamination from onsite chemical and hazardous materials	Compliance with all requirements of the Hazardous Substances Management Plan, including immediate reporting and clean-up of spill events
Maintain community and stakeholder support for the Project to facilitate construction activities	No verified complaints received are regarding a lack of engagement or consultation with the community and stakeholders
	No verified community complaints received about construction activities
	All community and stakeholder complaints are recorded and responded to within the required timeframes
Maintain accurate data for Project reporting and auditing	All required data is collected and stored in line with requirement

1.5. Structure of the SEMP and Supporting Management Plans

In accordance with Imposed Appendix A, Schedule 1, Condition 1 as per CG Change Report May 2025 this SEMP has been developed to guide the implementation of the following Construction Environmental Sub-plans:

- Stormwater Management Plan (LMDIP-05829-GNL-ENV-MPL-00002)
- Flora & Fauna (Terrestrial) Management Plan (LMDIP-05829-GNL-ENV-MPL-00003)
- Lighting Management Plan (LMDIP-05829-GNL-ENV-MPL-00004)
- Noise and Vibration Management Plan (LMDIP-05829-GNL-ENV-MPL-00005)
- Dust and Air Quality Management Plan (LMDIP-05829-GNL-ENV-MPL-00006)
- Community and Stakeholder Engagement Plan (LMDIP-05829-GNL-CMS-MPL-00001)
- Flora & Fauna (Dewatering) Management Plan (LMDIP-05327-GNL-ENV-MPL-00003)
- Traffic Management Plan (LMDIP-05806-ROD-TRR-MPL-00001)
- Weed and Pest Management Plan (LMDIP-05829-GNL-ENV-MPL-00009)

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- Waste and Resource Use Management Plan (LMDIP-05829-GNL-ENV-MPL-00008)
- Hazardous Substances Management Plan (LMDIP-05829-GNL-ENV-MPL-00007)
- Cultural Heritage Management Plan (LMDIP-05829-GNL-CHE-MPL-0001)

These Construction Environmental Sub-Plans are provided in the appendices. The general structure of each sub-plan has been described in Table 5.

It should be noted that the Flora & Fauna Management Plan covers all flora and fauna impacts and mitigation measures across the terrestrial aspects of the project whereas the Flora & Fauna (Dewatering) Management Plan covers all aquatic flora & fauna aspects associated with lake lowering activities.

Table 5: General sub-plan structure

Section Title	Content Description
Scope	Details the scope of the specific sub-plan and any stakeholders that were consulted during the development
Specific Performance Measures	Details the performance measures and targets that will be measured to verify the performance of the Project as related to the scope of the sub-plan
Roles and Responsibilities	Details the roles and responsibilities specific to the implementation of the sub-plan
Receiving Environment	Details the receiving environmental as related to the scope of the sub-plan
Legislative and Other Compliance Obligations	Details the legislation and CGCR addressable items as related to the scope of the sub-plan
Potential Impacts	Details the potential Project impacts as related to the scope of the sub-plan
Management Measures	Specific actions that will be implemented to minimise potential for environmental harm as related to the scope of the sub-plan
Corrective Actions	Actions to be taken in the event of a non-conformance, complaint or incident as related to the scope of the sub-plan
Reporting	Outlines the reporting that will be undertaken as related to the scope of the sub-plan
Training Awareness	Summary of training that will be supplied to personnel as related to the scope of the sub-plan
Review	Minimum review timeframes for the sub-plan

1.6. Location

The Project site is located at Lake Macdonald on the Sunshine Coast hinterland, approximately four kilometres (km) north-east of Cooroy and 15 km west of Noosa Heads. The Project site is located wholly within the Noosa local government area (refer to Figure 2)

Lake Macdonald is approximately 55 km upstream of the junction between Six Mile Creek and the Mary River, and has a catchment area of approximately 49 square kilometres (km²).

The Project site can be directly accessed via either the western access roads (Lake Macdonald Drive and the Seqwater Access Road crossing Six Mile Creek to the western entrance Noosa Water Treatment Plant) or the eastern access road route via (Cooroy-Noosa Road, Sivyers Road, Gumboil Road and Collwood Road) (Figure 3) to the eastern entrance to the Noosa Water Treatment Plant. There are no formed roads connecting the eastern and western boundaries of Lake Macdonald.

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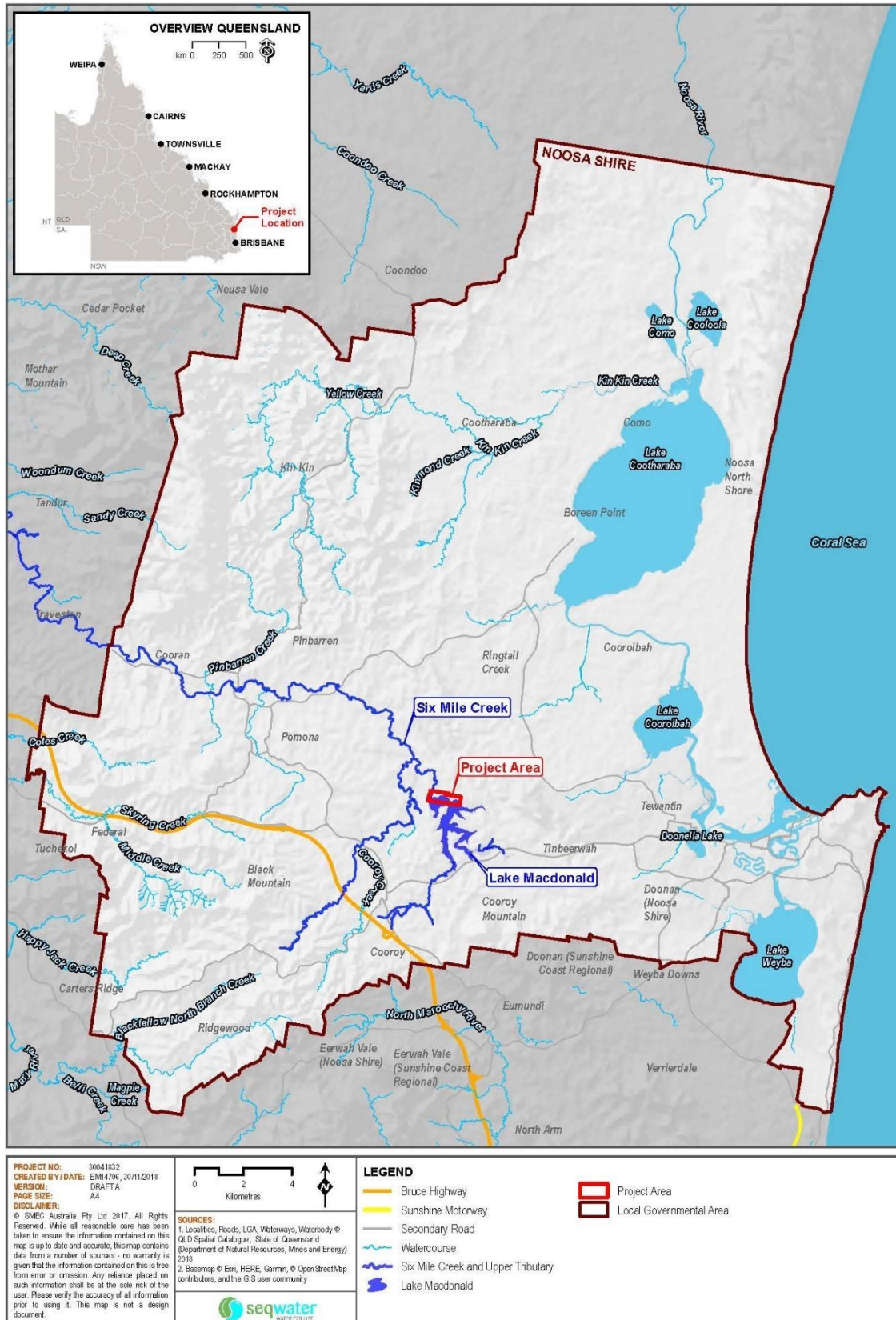


Figure 2: Project location

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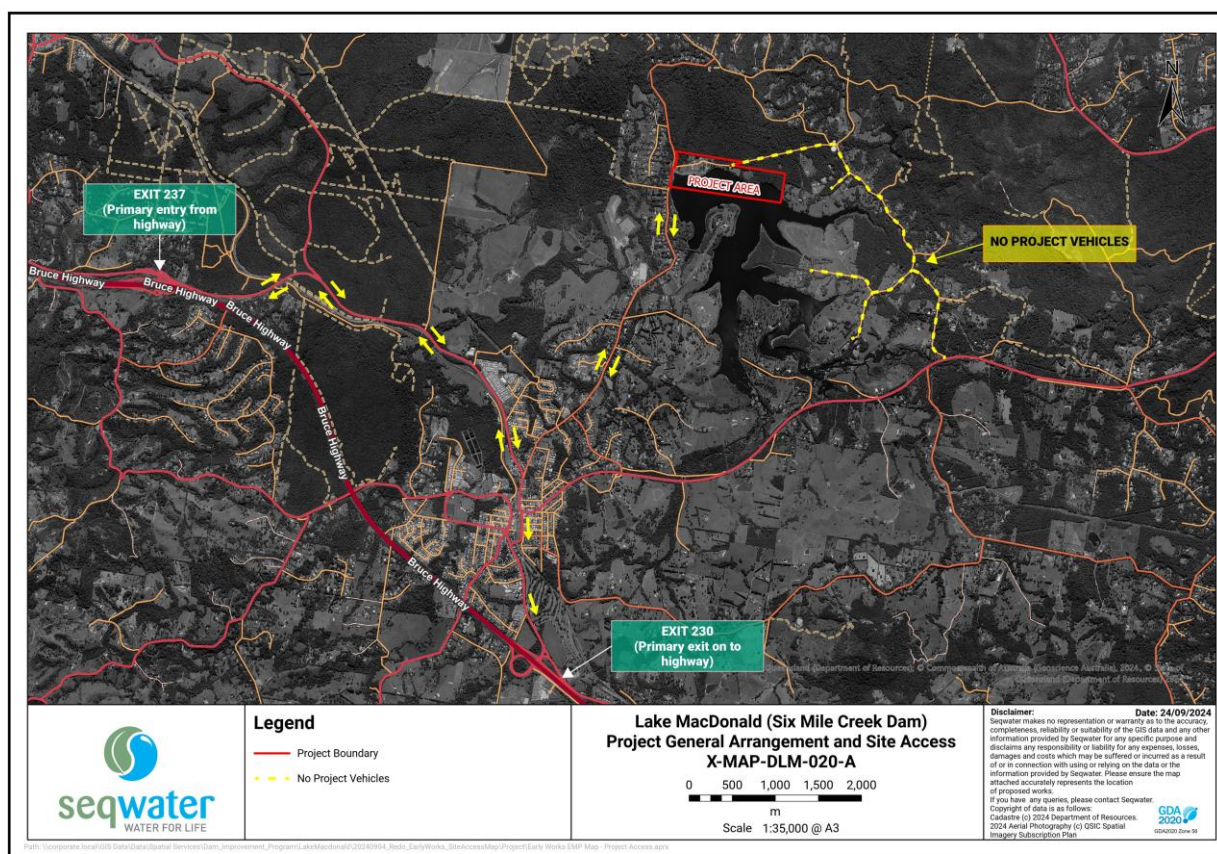


Figure 3: Project site access

2. Legislation and Regulatory Requirements

To ensure identified environmental impacts associated with the Project's construction and operation are minimised or avoided, this SEMP may refer to relevant environmental legislation, controls, standards, and guidelines. The SEMP also requires that works for the Project meet the community's environmental expectations, wherever possible.

Table 6 lists all Federal and State legislation relevant to this SEMP.

Table 6: Legislation relevant to the Project

Legislation	Relevance	Administering Authority
COMMONWEALTH		
<i>Environment Protection & Biodiversity Conservation Act 1999</i>	As a controlled action, the Project is subject to assessment and approval under this Act	Department of Climate Change, Energy, the Environment and Water (DCCEEW)
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Project management of Aboriginal cultural heritage	DCCEEW
STATE LEGISLATION		
<i>Aboriginal Cultural Heritage Act 2003</i>	Management of Aboriginal cultural heritage	Department of Women, Aboriginal and Torres Strait Islander

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Legislation	Relevance	Administering Authority
		Partnerships and Multiculturalism (DWATSIPM)
<i>State Development and Public Works Organisation Act 1971</i>	The administering legislation for a coordinated project. Legislation prescribing the primary approval coordinated project pathway undertaken for the Project. Project was assessed by the Coordinator General under an Impact Assessment Report	Department of State Development, Infrastructure and Planning
<i>Environmental Protection Act 1994 (EP Act) & Environmental Protection Regulation 2008</i>	Prescribes the environmental planning framework for approvals under the EP Act. Also defines the general environmental duties that are applicable to all persons in the State	Department of Environment, Tourism, Science and Innovation (DETSI)
<i>Waste Resource and Recycling Act 2011</i>	Promoting of waste avoidance and reduction, resource recovery and efficiency, and minimisation of the overall impact of waste generation and disposal	DETSI
<i>Environmental Protection Act 1994 (EP Act)</i>	Seqwater has an obligation to uphold their general environmental duty, duty to notify, and duty to restore the environment under the EP Act to prevent environmental harm, nuisance and contamination occurring from project activities	DETSI
<i>Environmental Protection (Noise) Policy 2019</i>	Management and protection of the acoustic environment to enhance and safeguard values	DETSI
<i>Environmental Protection (Air) Policy 2019</i>	Provides a framework to protect and enhance air environmental values	DETSI
<i>Environmental Protection (Water) Policy 2019</i>	Providing guidance and framework for making consistent, equitable, and informed decisions about waters	DETSI
<i>Fisheries Act 1994</i>	Management of fisheries' resources and habitats	Department of Primary Industries (DPI)
<i>Biosecurity Act 2014</i>	Management of weeds and pests	DPI
<i>Native Title (Queensland) Act 1993</i>	Management of native title	Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development (DNRMMRRD)
<i>Nature Conservation Act 1992</i>	Management and protection of plants and animals and management of Protected Areas	DETSI
<i>Nature Conservation Regulation 1994</i>	As above	DETSI
<i>Vegetation Management Act 1999</i>	Management of vegetation clearing	DNRMMRRD
<i>Water Act 2000 (Qld)</i>	Management of water usage, protection and treatment	DNRMMRRD
<i>Work Health and Safety Act 2011</i>	Management of workplace health and safety and hazardous chemicals	Office of Industrial Relations

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2.1. Permits and Approvals

Permits and approvals required for the Project, and the responsible entity for obtaining them, are provided in Table 7. Further details of permits and approvals required are contained in Appendix B.

Table 7: Project approvals and responsibilities

Approval / Permit	Responsibility
Coordinated Project - CGCR 2025	Seqwater
EPBC Act – Controlled Action Approval	Seqwater
Aboriginal Cultural Heritage Management Agreement	Seqwater
Environmental Authority – ERA 16 2(a) (Extractive and screening activities)	Principal Contractor
Waterway Barrier Works – Dam wall and spillway	Seqwater
Waterway Barrier Works – Gympie Weir Bio passage	Seqwater
Clearing Permit – Protected Plants	Principal Contractor
Permit to tamper with animal breeding places - least concern animals (low risk) – Species Management Program (SMP)	Principal Contractor
SMP - Permit to tamper with animal breeding places - EVNT animals (high risk) - Aquatic	Principal Contractor
SMP - Permit to tamper with animal breeding places - EVNT animals (high risk) - terrestrial	Principal Contractor
Road Corridor Permit Temporary road closure Permit to occupy	Principal Contractor
Dangerous Goods, Excess Dimensions, Excess Mass Permit	Principal Contractor
Dam Safety Regulator	Seqwater
Operational Works - Vegetation Clearing in Resource Area	Principal Contractor

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2.2. CGCR Addressable Items

Details of the CGCR addressable items applicable to this SEMP have been detailed in Table 8.

Table 8: CGCR addressable items relevant to this Management Plan

CGCR Reference	Type	Addressable Items	How addressed in this Management Plan
<i>Coordinator-General Condition</i>			
Appendix A. Imposed Conditions, Schedule 1, Condition 1 (c) Site Environmental Management Plan (SEMP)	Imposed condition	Not less than two months prior to commencement of the Project activities ¹ , the proponent is to submit a detailed site environmental management plan (SEMP) to the Coordinator-General for approval	This SEMP will be submitted to the Coordinator General for approval
	Imposed condition	The proponent cannot commence Project activities until the SEMP has been approved by the Coordinator General	This SEMP will be submitted to the Coordinator General for approval prior to commencing activities
	Imposed condition	(a) The SEMP must include: (i) the following construction EMPs: (A) stormwater management plan (B) flora & fauna (terrestrial) management plan (C) lighting management plan (D) traffic management plan (E) noise and vibration management plan (F) dust and air quality management plan (G) hazardous substances management plan (H) waste and resource use management plan (I) weed and pest management plan (J) cultural heritage management plan	Supporting environmental management plans are included as sub-plans and outlined in Section 1.5

¹ Project activities commence at the drawdown of Lake Macdonald to facilitate construction, and include lake drawdown, establishment of project construction facilities, construction of the temporary cofferdam, demolition of the existing spillway and embankments, construction of the replacement spillway and embankments, demobilisation and lake refill

CGCR Reference	Type	Addressable Items	How addressed in this Management Plan
		(ii) community and stakeholder engagement plan (iii) flora and fauna (dewatering) management plan.	
Appendix A – Imposed Conditions, Schedule 1 – Condition 2 Implementation of site environmental management plan	Imposed condition	The proponent must ensure project activities are conducted generally in accordance with the approved SEMP. Amendments to the approved SEMP (including EMPs) may be undertaken though must be generally consistent with the approved SEMP. Any amendments to the approved SEMP are to be provided to the Coordinator-General for information purposes. The amended SEMP is to be made available on the proponent's project website.	Implementation of this SEMP is described in Section 3
Appendix A – Imposed Conditions, Schedule 2. Monitoring, reporting and auditing, Condition 1 (a) Commencement of activity	Imposed condition	The proponent must notify the Coordinator-General and Noosa Shire Council at least 5 days prior to the commencement of project activities.	Monitoring, Inspection, Auditing, and Reporting requirements for the Project are provided in Section 6
Appendix 2 – Imposed Conditions, Schedule 2 – Monitoring, reporting and auditing, Condition 2 Monitoring and reporting	Imposed condition	The proponent must prepare a report every 3 months that summarises compliance and monitoring results for project activities and complaints.	Monitoring, Inspection, Auditing, and Reporting requirements for the Project are provided in Section 6

2.3. Environmental Policy

As outlined in Seqwater's Environmental Policy shown in Figure 4, Seqwater is committed to continuous improvement of environmental performance. Seqwater will comply with environmental performance requirements set by relevant legislation, monitor environmental performance, and continually improve environmental management practice through their Environmental Management System certified to the International Standard (ISO 14001:2004). This policy applies to all Seqwater employees and contractors and to any person or organisation that acts for or represents Seqwater.

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Policy Statement



Environment and Sustainability

Seqwater is a critical part of the urban water supply chain in South East Queensland, delivering a safe, sustainable and valued bulk water supply for more than 3.6 million South East Queenslanders. We also supply water to around 1,200 irrigators and rural customers, supporting Queensland's agriculture and other industries.

We are always looking forward, planning for South East Queensland's water security future and investing in and operating a vast range of water supply assets.

Our operations extend from Gympie in the north, to the New South Wales border in the south, and in the coming years will expand beyond the base of the Toowoomba ranges with the construction of the Toowoomba to Warwick pipeline.

We are one of the largest land managers in South East Queensland and one of the most geographically diverse water businesses in Australia, with many sites comprising significant natural and cultural heritage values.

On behalf of our communities, we provide important catchment health management, access to diverse recreation opportunities, and provide important flood mitigation services that contribute to the liveability and prosperity of South East Queensland.

We are committed to a positive culture of environmental responsibility and recognition of cultural heritage values.

To demonstrate our commitment, we will:

- prevent (by avoidance, reduction and/or control) pollution and harm to the environment
- apply sustainability principles across all organisational activities to enhance and protect environmental, cultural, economic and social values
- minimise resource consumption and generation of waste
- preserve and, where possible, enhance biological diversity and ecological integrity
- adopt innovative, knowledge driven and risk-based decision making in environmental management and climate change response
- promote and communicate continuous improvement and a positive culture of environmental and cultural heritage responsibility.

We will comply with environmental performance requirements set by relevant legislation, monitor environmental performance and continually improve our environmental and cultural heritage management practice and performance through our Environmental Management System certified to the International Standard ISO 14001.

This Policy aligns to our values of care, respect, courage and integrity which supports everything we do at Seqwater.

This Policy applies to all our employees and contractors and to any person or organisation that acts for or represents us.

Emma Thomas
Chief Executive Officer

Mr Neville Ide
Chairperson

27 March 2025

27 March 2025

Figure 4: Seqwater environmental policy

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3. Responsibilities and Implementation

3.1. Project Roles, Responsibilities and Authorities

To achieve the objectives of this SEMP, an implementation and management structure is required. The management structure for this SEMP is shown in Figure 5.

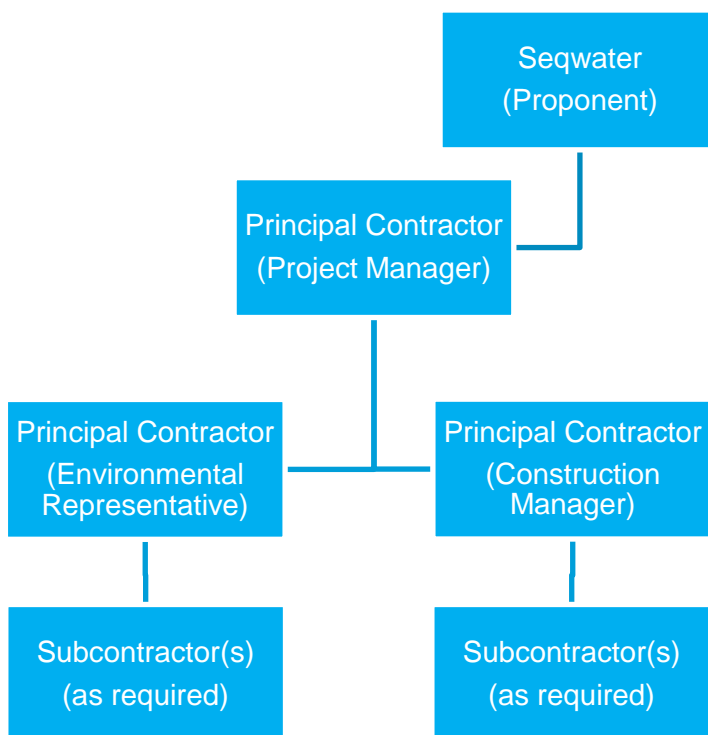


Figure 5: SEQ EMP management structure relationship (reproduced from Figure B3-1 of the draft EMP in the IAR)

The roles and responsibilities for delivery of environmental requirements for the Project are outlined in Table 9.

Table 9: Roles and responsibilities

Role	Responsibilities and Authorities
Seqwater	<ul style="list-style-type: none"> • Manage the construction process as the Project proponent • Provide readily available expertise for the construction Project as required • Receive progress reports on performance by the Principal Contractor for the purpose of acknowledging compliance with contract conditions • Review and approve the CEMP submitted by the Principal Contractor • Ensure that the requirements of the Conditions of Contract (Environmental Management) and approved SEMP included in the contract documentation are implemented • Review any revisions to the SEMP as required • Maintain a current copy of the contract and the SEMP, a record of the completion of planned actions, and monitoring records and reports, supplied by the Principal Contractor • Initiate audits of environmental performance • Regulate the environmental and social performance of the Project • Act to facilitate the expression of community views

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Role	Responsibilities and Authorities
	<ul style="list-style-type: none"> • Administrate the head agreement/contract to ensure contract conditions are met • Liaise with and coordinate relevant agencies, including the Queensland Government and Noosa Shire Council (NSC), to provide timely advice to the Principal Contractor for the smooth and efficient delivery of the Project • Ensure that the Principal Contractor is operating in accordance with this SEMP
Principal Contractor	<ul style="list-style-type: none"> • Implement this SEMP in accordance with their own Environmental Management System (EMS), processes, and procedures through development of a Project CEMP • Ensure all construction works are conducted in accordance with approvals, the contract, relevant legislation, and local laws • Maintain for the duration of the construction phase, open and effective communication with the communities in the vicinity of the Project about the construction program, scale, duration and nature of the proposed work, and details of proposed impact mitigation measures
Contractor Project Manager (PM)	<ul style="list-style-type: none"> • Develop CEMP in accordance with this SEMP and the approved Draft EMP submitted with the IAR • Maintain a master copy of the CEMP, a record of the completion of planned actions, and monitoring records and reports, which are made available during audits • Obtain all necessary statutory approvals and licences that the Principal Contractor is required to obtain and ensure that conditions of licences/approvals/permits are met • Provide copies of the CEMP to the relevant Project staff, with responsibilities clearly defined in the CEMP • Maintain a record of all training undertaken and competencies held by all Project staff, detailing the type and purpose of the training • Ensure that environmental protection measures are implemented in accordance with the CEMP • Coordinate regular monitoring in relation to environmental management issues and ensure that monitoring results are made available to the Proponent • Ensure corrective actions arising from self-assessments and external audits are completed, and in accordance with the CEMP • Notify Seqwater and any relevant agency of all environmental incidents and maintain a record of events relating to the environmental incidents, including any remedial action taken • Ensure there is adequate and accurate identification and reporting of all nonconformances, complaints and any other environmental issues that may arise during construction • Provide relevant and timely information about construction activities that may impact on the relevant stakeholders and as required, consult with individuals that may be directly impacted by construction activities to ensure direct Project impacts are being managed • Undertake regular management reviews of the SEMP, at scheduled intervals and on the identification of a system failure
Contractor Construction Manager (CM)	<ul style="list-style-type: none"> • Ensure all staff are trained/inducted to site (including environmental management responsibilities) and that all training/inductions are recorded in a Training and Induction Register • Ensure appropriate waste facilities are provided on site and that maintenance and waste disposal is conducted by a licenced contractor, where required • All vehicles accessing the site use the designated access routes, entries/exits, and parking locations • All equipment is maintained and 'fit for purpose' before arriving at the site • All environmental incidents and complaints are reported to the Environment Manager and Project Manager

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Role	Responsibilities and Authorities
	<ul style="list-style-type: none"> • Implementation of specialist advice regarding aquatic fauna passage and operation and design solutions for safe aquatic fauna passage
Contractor Commercial Manager (CCM)	<ul style="list-style-type: none"> • Ensure environmental requirements are considered in procurement processes • Facilitate procurement for items and subcontract packages required for conformance with this plan • Ensure environmental requirements are included in subcontracts, this is to include but not be limited to the requirements of this SEMP and relevant permits and approvals applicable to the works • Ensure environmental performance is considered in sub-contract progress reviews
Contractor Environment and Sustainability Manager (ESM)	<ul style="list-style-type: none"> • Day to day responsibility and authority for ensuring that the Environment EMS (as applied on the Project) conforms to the requirements of the EMS and ISO14001 • Day to day responsibility and authority for reporting on the performance of the EMS (as applied on the Project) to the Project Manager • This role is to be carried out by personnel with suitable environmental qualifications and experience • Ensure implementation and compliance with this SEMP, statutory approvals, legislation, codes of practice, and/or industry standards • Ensure any required exclusion zones are installed, complied with and maintained • Ensure all procedures and processes identified in the EMP are implemented • Participate in toolbox talks as required to ensure staff are aware of key concerns and environmental management procedures • Conduct daily/weekly inspections of work activities, including completion of a weekly Inspection Checklist and ensure adherence to the environmental management measures required by this SEMP • Review, revise, and audit this SEMP • Facilitate monthly third party compliance audits including subcontractors • Liaise with stakeholders, including regulatory agencies • Maintain all documentation required by the SEMP • Investigate any environmental incident or complaint, complete incident reports and implement appropriate corrective actions with the Project Manager • Notifications to DETSI on environmental incidents or non-compliances where appropriate • Verify qualifications and competency of persons undertaking specialist environmental works • Coordinate specialists and technical consultants for project-specific scopes including but not limited to: <ul style="list-style-type: none"> - providing aquatic fauna passage advice and operation and design solutions - fish salvage and relocation operations - fauna spotter catching - environmental monitoring and auditing - erosion and sediment control & water quality treatment
Engineers (Eng)	<ul style="list-style-type: none"> • Ensure environmental controls are established prior to commencement of construction activities • Participate in the preparation of Risk Management documentation • Immediately report any non-conformances, near misses or environmental incidents to the ESM • Ensure and verify that corrective actions are undertaken when required for non-conforming work

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Role	Responsibilities and Authorities
Health and Safety Manager (HSM)	<ul style="list-style-type: none"> Monitoring Project activities for compliance with Occupation, Health, Safety and Rehabilitation (OHS&R) legislative requirements Ensuring control measures outlined in the Workplace Risk Assessment (WRA), Activity Method Statement (AMS), Task Risk Assessment (TRA) and Worker Start Cards (WSC) are implemented throughout the life of the Project Preparing inspection reports and communicating OHS&R performance to the Contractors Project Manager Establishing and ongoing implementation of the incident and emergency procedures Inducting all personnel, subcontractors, and visitors about their safety obligations whilst onsite Ensuring that relevant licences, inductions, hazard assessments, and safety equipment as specified in the Project documentation are in place before any work activity be carried out onsite Carrying out safety inspections, enforcing safe work practices, monitoring activities, and recording observations so that OHS&R objectives and effectiveness can be assessed and modified as required
Community & Stakeholder Manager (CSM)	<ul style="list-style-type: none"> Monitoring Project activities for compliance with Principal Contractor and client community relations requirements Ensuring that the Community and Stakeholder Engagement Plan is correctly implemented Work with the environment, safety, and construction teams to implement strategies to minimise construction impacts on the local community Ensure community members are appropriately notified of Project work Manage the Project enquiries and responses Register and report community complaints and ensure adherence to the complaint's procedure
Supervisors (Sup)	<ul style="list-style-type: none"> Ensure that the CEMP and associated sub-plan requirements are communicated to all personnel and are being fully implemented on site Be aware of all approval/contractual conditions relating to the work Perform surveillance and monitoring of environmental controls to ensure that they are established and maintained with requirements Ensure rectifications of environmental controls are carried out as required Immediately report any non-conformances, near misses or environmental incidents to the ESM
Subcontractors	<ul style="list-style-type: none"> Implement requirements of All Project Personnel below Comply with reasonable directions given by Principal Contractor regarding environmental matters Implement any measures as required by legislation, permits and approvals as apply to the subcontracted scope of work Comply with the requirements of the CEMP and sub-plans as relevant to the subcontracted works

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Role	Responsibilities and Authorities
All Project personnel (including Subcontractors)	<ul style="list-style-type: none"> • Comply with reasonable directions given by the ESM regarding environmental matters • Comply with the requirements of this Management Plan as relevant to the subcontracted works • Environmental incidents, non-conformances and near misses are to be reported to the Supervisor <p>General Environmental Duty</p> <ul style="list-style-type: none"> • Under Section 319 of the EP Act, everyone has a general environmental duty to not undertake an activity that causes or is likely to cause environmental harm unless all reasonable and practicable measures are taken to avoid that harm • All staff and sub-contractors will attend a site-specific environmental induction and awareness training to ensure that all personnel are aware of their responsibilities in this regard <p>Duty to Notify</p> <ul style="list-style-type: none"> • The EP Act also imposes a 'duty to notify' (Section 320A - 320G) upon any person who becomes aware that their activities, or the activities of somebody working with them, has caused or threatens to cause material or serious environmental harm that is unlawful under the EP Act. All persons to follow the incident reporting processes outlined in Section 6 of this SEMP • Environmental incidents are to be reported to the ESM <p>Material Environmental Harm</p> <ul style="list-style-type: none"> • Under Section 320 of the EP Act, any person who becomes aware of an incident causing or threatening to cause material environmental harm must notify the ESM within 24 hours. Material environmental harm is environmental harm that: <ul style="list-style-type: none"> — Is not trivial or negligible in nature, extent or context — Causes actual or potential loss or damage to property of an amount exceeding the threshold prescribed by regulation but less than the maximum amount — Results in costs of more than the threshold amount but less than maximum amount being incurred in taking appropriate action to prevent or minimise harm and rehabilitate or restore the environment • All staff and sub-contractors will attend a site-specific environmental induction and awareness training to ensure that all personnel are aware of their responsibilities in this regard <p>Serious Environmental Harm</p> <ul style="list-style-type: none"> • Section 319 of the EP Act imposes a duty to notify the ESM of serious environmental harm within 24 hours. Serious environmental is harm that: <ul style="list-style-type: none"> — Is irreversible, of a high impact or widespread — Impacts an area of high conservation value or special significance — Results in actual or potential loss or damage to property of an amount exceeding the threshold prescribed by regulation — Results in costs of more than the threshold amount being incurred in taking appropriate action to prevent or minimise harm and rehabilitate or restore the environment • All staff and sub-contractors will attend a site-specific environmental induction and awareness training to ensure that all personnel are aware of their responsibilities in this regard

3.2. Appropriately Qualified Persons

Management of the SEMP will be undertaken by qualified staff with the appropriate training and experience. All staff must be trained in incident reporting and environmental awareness through the induction/onboarding

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process. All environmental activities are to be carried out by appropriately qualified personnel which will be verified by the ESM.

The ESM will consult with appropriately qualified personnel (aquatic fauna specialists) in the development of management options and actions (including design options) to address risks from the proposed works.

3.2.1. Competence & Training

All employees and subcontractors working on site will be provided with environmental training to achieve a level of awareness and competence appropriate to their assigned activities. Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.

Staff involved in environmental monitoring will be trained and competent in the activities to be undertaken (including sample collection, handling, storage, and transport) and in the operation, calibration, and maintenance of any equipment to be used.

Staff involved in update of the project CEMP sub-plans will be appropriately qualified and experienced in design and/or development of those sub-plans.

Records of staff training will be maintained by the site environmental representative and will be auditable and available for inspection on request.

3.2.2. Induction & Awareness Training

Before site personnel under the Project's control begin work, they must be inducted and are aware of:

- The requirements of the CEMP, sub-plans and Site Rules
- The Environment Policy (Figure 4)
- The significant environmental aspects and values in the vicinity of the Project site and related actual or potential environmental impacts associated with their work
- Identify activities with a high risk of environmental impact
- Responsibilities and accountabilities of site personnel
- Their contribution to the effectiveness of the environmental management system, including the benefits of enhanced environmental performance
- The implications of not conforming with the environmental management system requirements, including not fulfilling the organisation's compliance obligations
- Expectations for visitor site access requirements and associated workplace health and safety behaviours

Note: the Sub-Management Plans for the CEMP also prescribe aspect-specific training and induction requirements.

Routine 'toolbox' discussions will be held to ensure that feedback can be provided on issues of interest or concern and that information arising from Project-specific issues is communicated to all relevant staff. It is anticipated that 'toolbox' discussions will generally be prepared and delivered by Principal Contractor representatives. Induction and 'toolbox' records will be maintained to verify attendance.

The Health and Safety Manager shall be responsible for the conduct of inductions and toolbox discussions, however typically subject matter experts will deliver relevant materials – e.g. Environment Team for environmental matters, Community and Stakeholder Team for communications and engagement and so on.

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3.3. Site Visitors

Any visitors to the site will be given a site-specific Induction and will be escorted around the site by an authorised person. Visitors must remain with an authorised person at all times. The escort will alert the visitors to hazards on site, including workplace health and safety issues and expected behaviours.

4. Documentation, Communication, and Complaints

4.1. Document Authority and Precedence

This plan is owned and managed by the Environment and Sustainability Manager. It remains a live document throughout the delivery of the works and will be updated as required. It has been implemented following the execution of the Project Agreement and this plan itself.

4.2. Documentation and Records

Adequate documentation and records must be maintained to demonstrate compliance with the EWEMP. These records should be available at all times and readily accessible for independent inspection and audit. This includes, but is not limited to:

- Contract documents
- Statutory permits and licences
- Hazard, near miss, incident, and technical reports
- Monitoring data results
- Environmental audits and reviews
- Environmental training records
- Non-conformance reports and details
- Complaints register
- Community consultation reports
- Inspection, calibration, and maintenance records
- Environmental incident investigations and reports
- Corrective action reports

The following documents must be readily accessible to personnel undertaking activities associated with the Project:

- A copy of the CEMP and sub-plans
- Copies of environmental checklists and forms required by the CEMP
- Copies of relevant work instructions and procedures
- Safety Data Sheets (SDS) for any chemicals stored or used on the site
- Copies of permits, approvals, and attached conditions

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4.3. Communication

4.3.1. Internal Communication

Environmental protection should be achieved through clear and concise internal communication. The Project shall:

- internally communicate information relevant to the EMS among the various levels and functions of the Project and the Principal Contractor, including suggested changes to the EMS, as appropriate
- ensure the communication processes enable persons doing work under the Project's control to contribute to continual improvement.

Typical methods of communicating important messaging to the workforce will include:

- Daily pre-start Meetings
- Project Team Meetings
- Health, Safety, Environment and Quality (HSEQ) Team Meetings
- Client Meetings
- Subcontractor Meetings
- HSEQ System Review Meetings
- Toolbox talks as per Section 3.2.2
- Message boards (located at crib rooms / site office)
- Site signage

Meetings shall include appropriate environmental information and shall be minuted and recorded.

Internal communication will also include written instruction, this encompasses drawings, specifications, method statements, risk assessments, contracts and subcontracts.

Communications regarding environmental management will be audited periodically to ensure that the communication structure is effective, and that all actions are performed and recorded.

These audits will also include follow-up of specific or corrective actions raised during previous audits to ensure that actions are complete. The CEMP is to be stored in a prominent location.

Significant communications, including all reports, incident forms, and complaints, will be documented and kept up to date.

Emergency Response, emergency contacts, and Incident notifications are covered in Section 5.

4.3.2. External Communication

To ensure external communication is timely and transparent, only nominated personnel will be involved in consultation with external bodies on environmental issues. Seqwater and the Principal Contractor are responsible for nominating all staff members responsible for external communication. Seqwater may also invite personnel to attend meetings with agencies.

Any environmental incidents and instances of environmental harm that occur during construction will be reported to the DETSI or other relevant regulatory agency as soon as possible (as per Section 320 of the EP Act).

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4.4. Enquiries and Complaints

4.4.1. Contact Details

Community enquiries and complaints can be received via:

- Seqwater's 24-hour community hotline: (07) 5472 1565
- Seqwater's project info line: (07) 3432 7000
- Seqwater's email: projectinfo@Seqwater.com.au
- Seqwater's webpage - <https://www.Seqwater.com.au/contact-us>

The 24-hour community hotline, email address, and webpage are maintained by Seqwater and in some instances will be responded to by the Principal Contractor, who will investigate and respond following the required response timeframes (Table 10). All written Project communications will include the community hotline, email, and web address.

All calls to Seqwater's **project info line** – (07) 3432 7000, will be answered by Seqwater (Monday to Friday 9am to 5pm). Calls to the **community hotline** – (07 5472 1565) will be answered by the Principal Contractor 24 hours a day, seven days a week.

4.4.2. Complaint Management

Responses to complaints will be carefully managed, prompt, and effective, and will form a key part of the environmental reporting mechanism. Responsibility for managing the complaints process will rest with Seqwater, supported by the Principal Contractor. When a complaint is made, the flow charts in Figure 6 will be followed.

The following minimum details will be recorded and included in the investigation of the complaint:

- The time and date of the complaint
- The identity of the complainant and the person recording the complaint
- The specific action or activity causing the complaint
- Whether environmental compliance requirements are being met
- The investigations undertaken and time taken to address the complaint, if necessary
- Immediate communication of the complaint to Seqwater
- Any necessary subsequent remedial action to avoid cause for future complaints, if relevant

The Project team will respond to a complaint within 48 hours of the complaint being received. The initial response to the stakeholder will be an acknowledgement of the complaint, with a team member assigned to close out the complaint. The second response to the stakeholder will be the formal response to the complaint with any associated actions that the Project team will take.

If a complainant remains unsatisfied, the complaint will be escalated to a relevant Project Team Manager. Complaints that the Principal Contractor cannot resolve will be further escalated to Seqwater.

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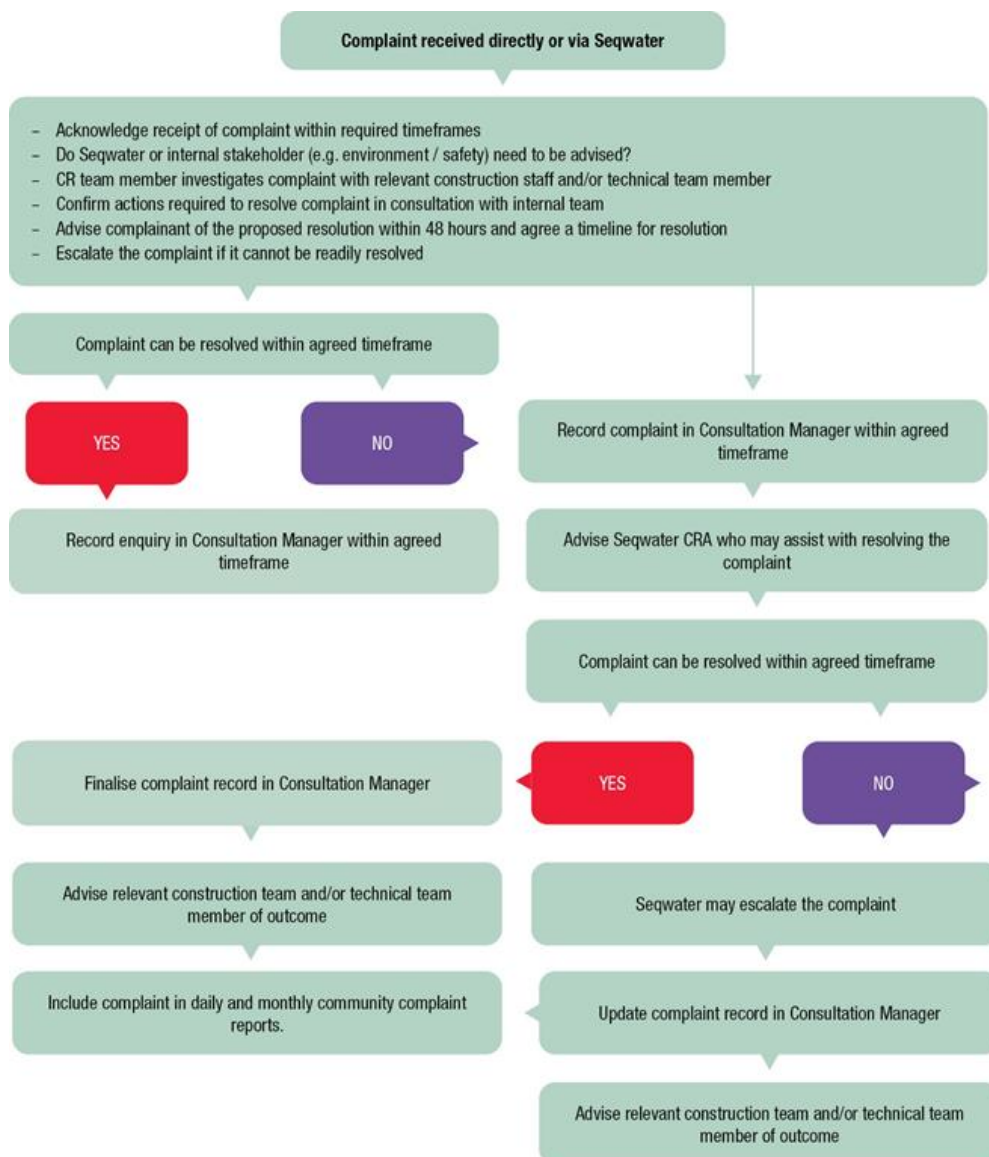


Figure 6: Complaint flow chart

4.4.3. Enquiry Management

Responses to enquiries will be prompt, and effective. Responsibility for managing the enquiries process will rest with Seqwater, supported by the Principal Contractor. When an enquiry is received, the flow charts in Figure 7 will be followed. The timeframes for responding to enquires and complaints are shown in Table 10.

Table 10: Enquiry response timeframes

Enquiry	Response Time
All online enquiries	Initial acknowledgement within 48 hours
General or information enquiries	Up to ten (10) working days
Technical enquiries	Up to ten (10) working days

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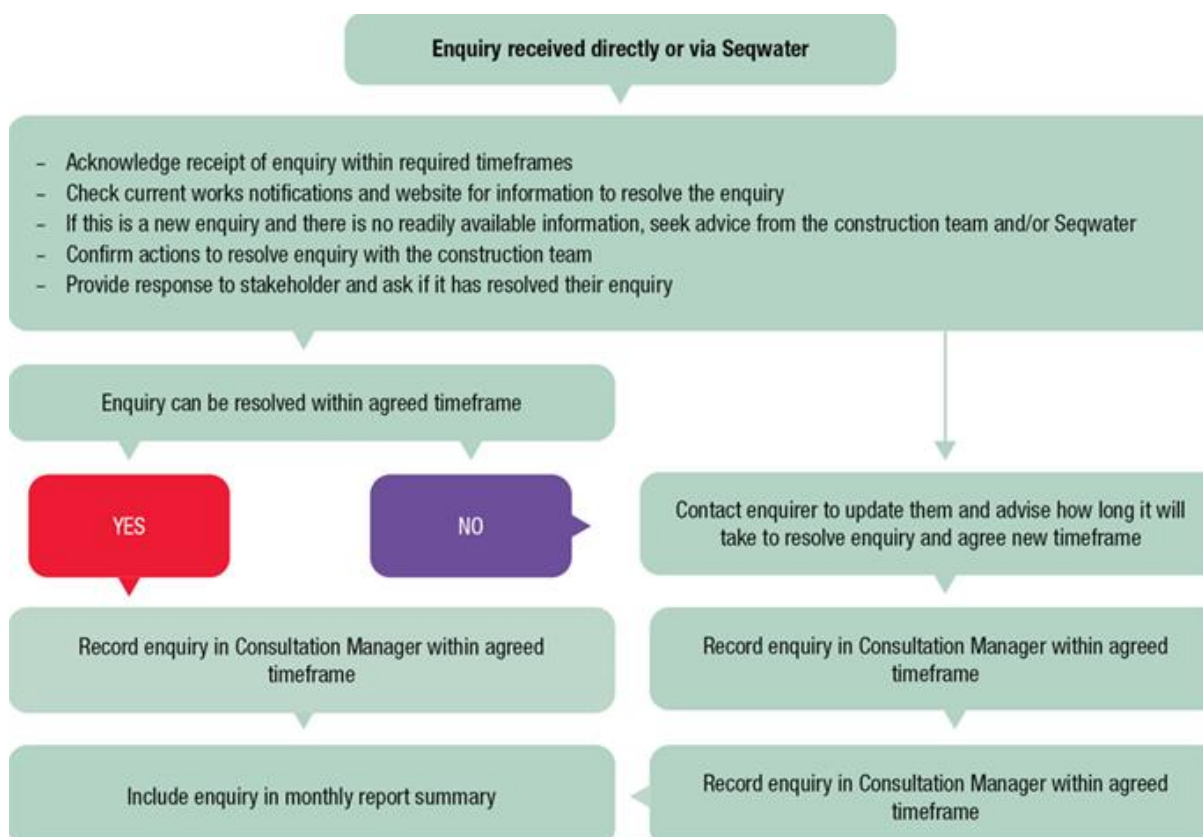


Figure 7: Enquiry flow chart

4.4.4. Reporting and Monitoring

Comprehensive reporting methods will be implemented to ensure accountability, track Project progress, and facilitate ongoing evaluation of engagement activities. All stakeholder interactions will be recorded in Seqwater's customer database, Consultation Manager, with the following information:

- Date and time the of the interaction
- Name and contact details of the stakeholder
- Nature of the engagement
- Responsible team member assigned to the engagement
- Conclusions formed and actions taken to resolve

Weekly, monthly, and quarterly reports, in accordance with Section 6 will document all enquiries and complaints received, and report on their outcomes.

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5. Emergency Management

5.1. Emergency Response

In an emergency call **000**

Call the Seqwater Incident Hotline **(07) 3270 4040** for all incidents and emergencies.

The Emergency Response Plan nominates the following six step response framework when an incident occurs, which results in the release of contaminants or has the potential for environmental harm the following actions will be taken as soon as practicable:

1. Identify and assess event severity
2. Notify
3. Establish command and control
4. Manage the emergency
5. Manage the recovery
6. Improvement Actions

Instances of environmental harm that occur during construction will be reported to the DETSI or other relevant regulatory agency by the ESM as soon as possible (as per Section 320 of the EP Act).

5.2. Emergency Preparedness and Response

The Project has established processes to prepare for and respond to potential emergency situations including:

1. Planning response actions to prevent or mitigate adverse environmental impacts from emergency situations
2. Responding to actual emergency situations
3. Preventing or mitigating the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact
4. Periodically testing the planned response actions, where practicable
5. Periodically reviewing and revising the process and planned response actions, in particular after the occurrence of emergency situations or tests
6. Providing relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under the Project's control.

The Project shall maintain documented information to the extent necessary to have confidence that the process is carried out as planned.

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5.3. Emergency Contacts

All incidents and emergencies should be notified to your immediate Supervisor and the Seqwater Incident Hotline (07) 3270 4040, in the first instance.

The key personnel and emergency services to be contacted in the event of an emergency are shown in Table 11. The list of emergency contacts is to be provided to all personnel during induction training and is also to be placed in all site vehicles and heavy machinery.

Table 11: Seqwater emergency contacts

Position	Contact Number
Seqwater Incident Hotline	07 3270 4040
Water Treatment Plant (WTP) North (includes North Pine WTP)	07 3035 5765
Duty General Manager	07 3035 5763
Duty Manager	07 3035 5760
Duty Communications Advisor	07 3247 3000
Flood Centre	07 3831 0795
WTP South	07 3035 5761
WTP Central	07 3035 5782
Supply Systems	07 3270 4082
Catchments	07 3035 5776
Drinking Water Quality	07 3035 5764
Dam Safety	07 3035 5762
Environment	07 3035 5779
Process Improvement	07 3035 5780
WHS	07 3035 5783

6. Monitoring, Inspections, Auditing, and Reporting

6.1. Monitoring

Site-specific environmental monitoring requirements for each environmental aspect are summarised in each sub-plan. The monitoring of environmental impacts will be carried out in accordance with the requirements for each environmental aspect as provided in the relevant sub-plan. Monitoring procedures will be developed in accordance with standard protocols and the requirements of the DETSI, DPI and other relevant agencies as appropriate.

All equipment used for environmental monitoring will be calibrated and maintained to the standards recommended by the supplier/manufacturer. Calibration and maintenance records will be documented for each piece of monitoring equipment and available for inspection as requested.

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Environmental monitoring samples, if taken, will be sent for analysis to a National Association of Testing Authorities (NATA) registered laboratory, where applicable. All records of laboratory analysis results and quality assurance will be auditable and available for inspection, on request, by regulatory agency officials or their representatives.

6.2. Inspections

6.2.1. Daily Observations

Supervisors will record daily observations in their site diaries. Any environmental-related observations will be provided to the ESM before the end of each working day. Any observations that are still outstanding at the time of the Weekly Environmental Inspection Checklist will be incorporated into the checklist inspection.

6.2.2. Weekly Environmental Inspections

The ESM shall undertake, coordinate, and document Weekly Site Environmental Inspections to:

- Verify management measures prescribed in the sub-plans are present, functional, and adequate
- Observe the Site for actual or potential environmental harm or environmental nuisance
- Identify maintenance requirements for implemented management measures
- Verify preparedness for adverse weather conditions where forecast

The inspections will follow a tailored Environmental Inspection Checklist to cover all environmental management measures described in the CEMP sub-plans and will cover all active working areas across the Project. The inspections will highlight any areas where intervention or action is required to prevent a potential non-compliance. Actions will be recorded in the checklist and assigned due dates and tracked to closure through the Principal Contractors' Corrective Action Register (CAR).

The Weekly Site Inspection records shall be made available to Seqwater within 48 hours of a request.

The Project shall retain documented information as evidence of the compliance evaluation results.

6.3. Auditing

Aspects of the Project with a potential for environmental impact will be subject to periodic environmental audits. The objective of audits is to verify compliance with applicable Commonwealth, State, and Local Government environmental permits, approvals, and regulations issued for the Project.

Audits will seek to verify the suitability of each sub-plan and will be reviewed by Seqwater. All recommendations and actions raised will be addressed. Copies of audit reports and details of corrective actions will be made available for regulatory inspection, on request.

6.3.1. Internal Audits

The Principal Contractor shall conduct internal HSE audits of the Project at planned intervals not exceeding 12 months, to provide confirmation that the Project is compliant with its regulatory approval conditions.

The Principal Contractor will establish, implement, and maintain an internal audit program for the Project, including the frequency, methods, responsibilities, planning requirements, and reporting of internal audits.

When establishing the internal audit programme, consideration will be given to the environmental importance of the processes concerned, changes affecting the Project, and the results of previous audits. Internal audits will be undertaken to validate conformance with the environmental management system. At a minimum the scope of the audit should include:

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- Results of previous audits
- Conformance with the CEMP and each additional sub-plan

Each audit will involve subcontractors, suppliers, and consultants, as appropriate depending on the nature and scope of the audit. As part of each audit the Principal Contractor will:

- Define the audit criteria and scope for each audit
- Select auditors and conduct audits to ensure objectivity and the impartiality of the audit process
- Ensure that the results of the audits are reported to Seqwater
- Retain documented information as evidence of the implementation of the audit program and the audit results

6.3.2. External Audits

In accordance with Appendix A Imposed Conditions, Schedule 2 – Condition 3 Seqwater will conduct annual third-party audits of this CEMP and its sub-plans. These Audits will be undertaken in accordance with *AS/NZS ISO 19011:2014 Guidelines for auditing management systems*, by an appropriately qualified person engaged by Seqwater.

The audits will be conducted within the first three months from the commencement of project activities and then performed yearly thereafter until the Coordinator-General is satisfied all requirements have been completed. Audit reports will be provided to the Coordinator-General within 20 business days of receipt from the Third Party.

The scope of each third party audit will include:

- Conformance with the CEMP and each additional sub-plan
- Compliance with the conditions of approval, including:
 - EPBC Act Approval
 - Environmental Authority for Borrow Pits
 - Development Approval for the Waterway Barrier Works
 - SMPs
- Compliance with other legislative requirements
- Any regulatory action or notice received over the audit period

The audit will involve Seqwater and the Principal Contractor. The audit will include document review, audit interviews and a site visit. The final audit report will be completed within 90 days of the site visit being undertaken.

6.4. Reporting

The Principal Contractor shall prepare a monthly report for Seqwater documenting compliance with this SEMP, the CEMP and its sub-plans. This report shall (as a minimum) include the following:

- A summary of all monitoring data and associated compliance/non-compliance
- An evaluation of compliance with the CEMP and sub-plans
- Any environmental incidents occurring within the reporting period – including an assessment of the impacts (if any) associated with the incidents/non-conformance along with any actions taken to prevent reoccurrence
- A summary of actions taken to address and non-compliances/incidents in the reporting period
- Any updates to the register of approvals, licences, and permits

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- Positive environmental outcomes
- Complaints received
- Corrective actions and contingency
- Resource usage (e.g. energy, water, fuel and emissions, concrete and steel consumption, waste generation etc.)
- Updates on Project environmental performance against agreed objectives criteria listed in this SEMP and its sub-plans
- A summary of any audit finding should any audit be undertaken during the applicable reporting period.

General reporting requirements under this SEMP is summarised in Table 12. Additional reporting requirements for each environmental aspect are detailed in each sub-plan.

Table 12: General reporting for this SEMP

No.	Reporting Required	By Whom	By When	To Whom
1.	Details of field observations shall be reported via the Weekly Environmental Inspection Checklist, and communicated during pre-starts, toolbox and team meetings as appropriate	ESM	Project Delivery	All personnel
2.	All complaints / incidents	All personnel / CSM	Within 1 hour of an incident/complaint	ESM / PM / Seqwater
3.	Notification of environmental harm	ESM	Within 24 hours	Administrating Authority
4.	Results of investigations and corrective actions	CSM / ESM	Within 10 days of the complaint / incident	Complainant / PM / Administrating Authority
5.	Results of monitoring undertaken under the CEMP	ESM	On Request	Seqwater
6.	Monthly report to Seqwater that includes details of lighting related monitoring results, audits, non-conformance, training, and incidents	ESM	Monthly	Seqwater
7.	<p>Quarterly report to the CG as per the requirements of schedule 2, condition 2. Report will include:</p> <ul style="list-style-type: none"> • An evaluation of compliance with the SEMP • Monitoring data required by the Imposed Conditions included in Schedule 1 of the CGER (2019) for the period and an interpretation of the results • Details of any environmental incident during the reporting period, including a description of the incident, resulting effects, corrective actions (including site remediation activities), revised activity practices to prevent a recurrence, responsibility and timing <p>The reports must be provided to the entity nominated as having jurisdiction for the relevant condition and also be made available on the Project website within 20 business days of the end of the three-month period to which the report relates and continue to be available on the project website for the duration of the Project</p>	Seqwater	Quarterly	Coordinator-General

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7. Incident and Corrective Actions

When an incident (including non-compliance, a non-conformance with a management plan, or a verified complaint) occurs, the Principal Contractor is required to react to the incident, as applicable:

- Take action to control and correct it
- Deal with the consequences, including mitigating adverse environmental impacts
- Evaluate the need for action to eliminate the causes of the incident, in order that it does not recur or occur elsewhere, by:
 - Reviewing the event
 - Determining the cause/s of the event
 - Determining if similar events exist, or could potentially occur
- Implement any action needed
- Review the effectiveness of any corrective action taken
- Recommend changes to this SEMP and any sub-plan and communicate this to Seqwater

Corrective actions shall be proportional to the significance of the effects of the incident, including the environmental impact(s). Notifications of incidents to the Project Manager or higher will also include the nominated Seqwater representative.

If the incident has led to actual or potential environmental harm, the following notification steps shall be taken by Seqwater:

- Notify the administrating authority (DETSI) in writing of any:
 - Incident that resulted in actual or potential environmental harm
 - Non-compliance with the conditions
 - Non-compliance with the commitments made in the CEMP and its sub-plans
 - The notification shall be given within 24 hours of the event being identified
- The notification must specify:
 - Any condition which is or may be in breach
 - A short description of the incident and/or non-compliance
 - The location (including co-ordinates), date and time, to the extent that these can be determined, of the incident and/or non-compliance
 - Details of any corrective measures undertaken
- The Project must provide to the DETSI the outcome of the incident investigations as soon as practicable and no later than 10 business days after becoming aware of the incident and/or non-compliance, specifying:
 - The identified causes of the incident
 - Any corrective action or investigation which has already taken or is intended to be taken in the immediate future
 - The potential impacts of the incident and/or non-compliance
 - The method and timing of any remedial action that will be undertaken by the Proponent

The Project shall retain documentation for all incidents and/or non-compliance, with the following information recorded:

- Time, date and details of the incident

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- How the incident occurred
- Action taken to remedy the incident
- Investigation into the incident
- Recommendations from investigation
- Reporting actions taken to notify relevant agencies.

8. Review

This SEMP shall be reviewed within the first 3 months of site mobilisation. Follow up reviews are to be undertaken annually during construction. Periodically, events may occur that necessitate review and or revision to management plans, procedures and processes. Events may include but are not limited to the following:

- Audit findings and recommendations
- Non-conformances
- Trends in monitoring data
- Changes to the regulatory framework
- Changes to standards and guidelines applicable to the work

9. Appendices

As described in Section 1.5 the following appendices make up the Sub-Plans of this SEMP:

- 9.1 Stormwater Management Plan (LMDIP-05829-GNL-ENV-MPL-00002)
- 9.2 Flora & Fauna (Terrestrial) Management Plan (LMDIP-05829-GNL-ENV-MPL-00003)
- 9.3 Lighting Management Plan (LMDIP-05829-GNL-ENV-MPL-00004)
- 9.4 Noise and Vibration Management Plan (LMDIP-05829-GNL-ENV-MPL-00005)
- 9.5 Dust and Air Quality Management Plan (LMDIP-05829-GNL-ENV-MPL-00006)
- 9.6 Community and Stakeholder Engagement Plan (LMDIP-05829-GNL-CMS-MPL-00001)
- 9.7 Flora and Fauna (Dewatering) Management Plan (LMDIP-05327-GNL-ENV-MPL-00003)
- 9.8 Traffic Management Plan (LMDIP-05806-ROD-TRR-MPL-00001)
- 9.9 Cultural Heritage Management Plan (LMDIP-05829-GNL-DHE-MPL-0001)
- 9.10 Hazardous Substances Management Plan (LMDIP-05829-GNL-ENV-MPL-00007)
- 9.11 Waste and Resource Use Management Plan (LMDIP-05829-GNL-ENV-MPL-00008)
- 9.12 Weed and Pest Management Plan (LMDIP-05829-GNL-ENV-MPL-00009)

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9.1. Stormwater Management Plan

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9.1.1. Erosion & Sediment Control Plan

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9.2. Flora & Fauna (Terrestrial) Management Plan

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9.3. Lighting Management Plan

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9.4. Noise and Vibration Management Plan

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9.5. Dust and Air Quality Management Plan

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9.6. Community and Stakeholder Engagement Plan

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9.7. Flora & Fauna (Dewatering) Management Plan

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9.8. Traffic Management Plan

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9.9. Cultural Heritage Management Plan

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9.10. Hazardous Substance Management Plan

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9.11. Waste and Resource Use Management Plan

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9.12. Weed and Pest Management Plan

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