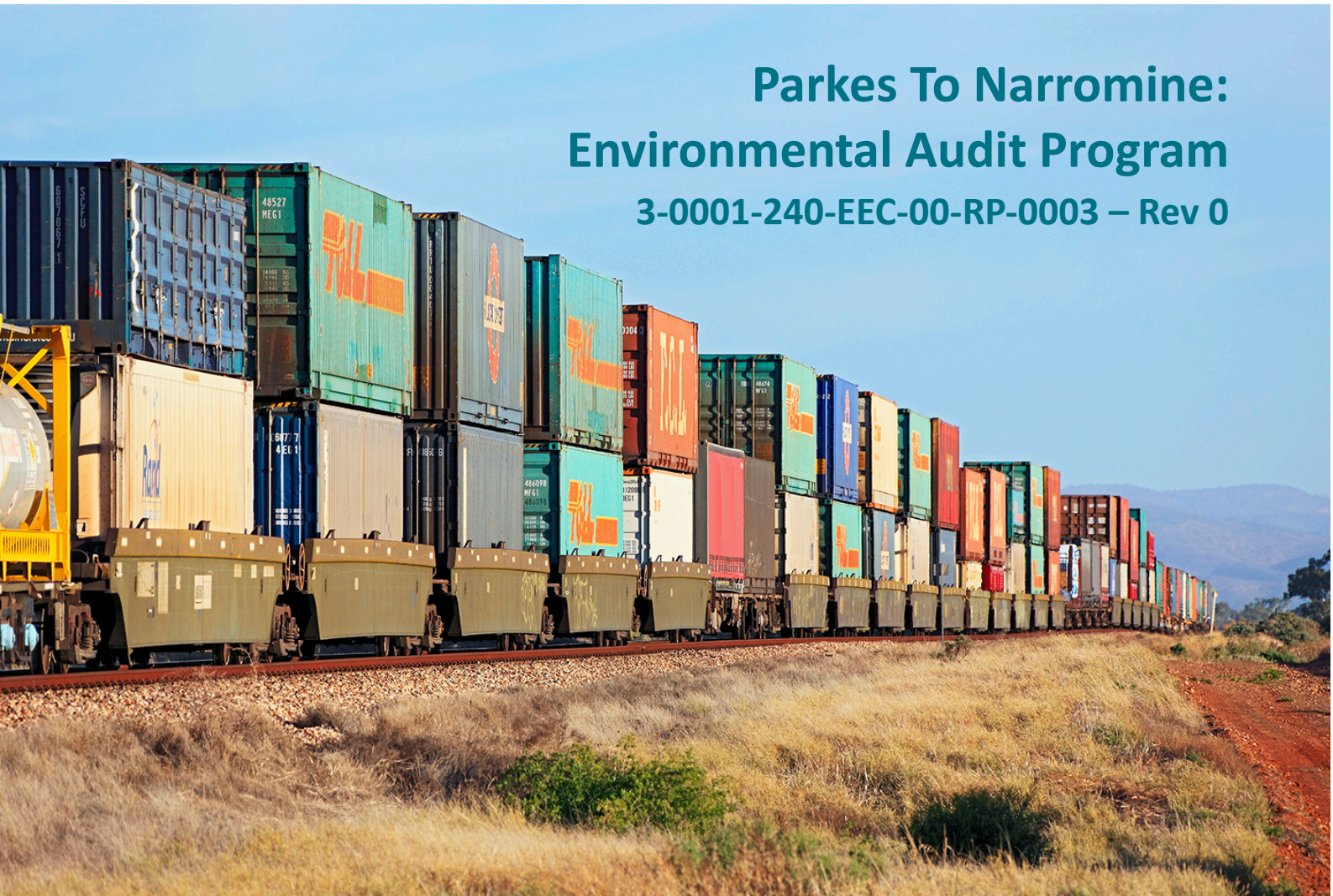


ARTC *InlandRail*

The Australian Government's priority freight rail project

Parkes To Narromine: Environmental Audit Program

3-0001-240-EEC-00-RP-0003 – Rev 0





Disclaimer: *This document is designed to provide general information on the framework for annual independent environmental auditing that will be implemented by ARTC for the project.*

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1. BACKGROUND

Australian Rail and Track Corporation (ARTC) submitted a State Significant Infrastructure (SSI) application to construct and operate the Parkes to Narromine (P2N) Inland Rail Project (the project) under Part 5, Division 5.2 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The project was approved by the Minister for Planning in 2018 (SSI_7475).

The project has also been subject to approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The P2N project was declared by the Commonwealth Minister for Sustainability, Environment, Water, Populations and Communities to be a controlled action under the EPBC Act on 11 October 2016.

Construction of the project is expected to commence in September 2018 for a period of 18 months to March 2020. Rail operations are expected to commence from mid 2020, with full Inland Rail operational connectivity expected by 2024.

As the proponent of the project, ARTC is required to prepare and implement an Environmental Audit Program (EAP) to meet the independent environmental auditing requirements of the project approval.

2. PURPOSE

The EAP has been developed in accordance with project approval conditions. The purpose of the EAP is to document the framework for independent environmental auditing of the project. The purpose of independent environmental auditing is to ensure compliance of the project against the project approval and monitor, assess, review and improve the environmental performance of the project for construction and the first two years of operation.

Table 1 Relationship to P2N Planning Conditions

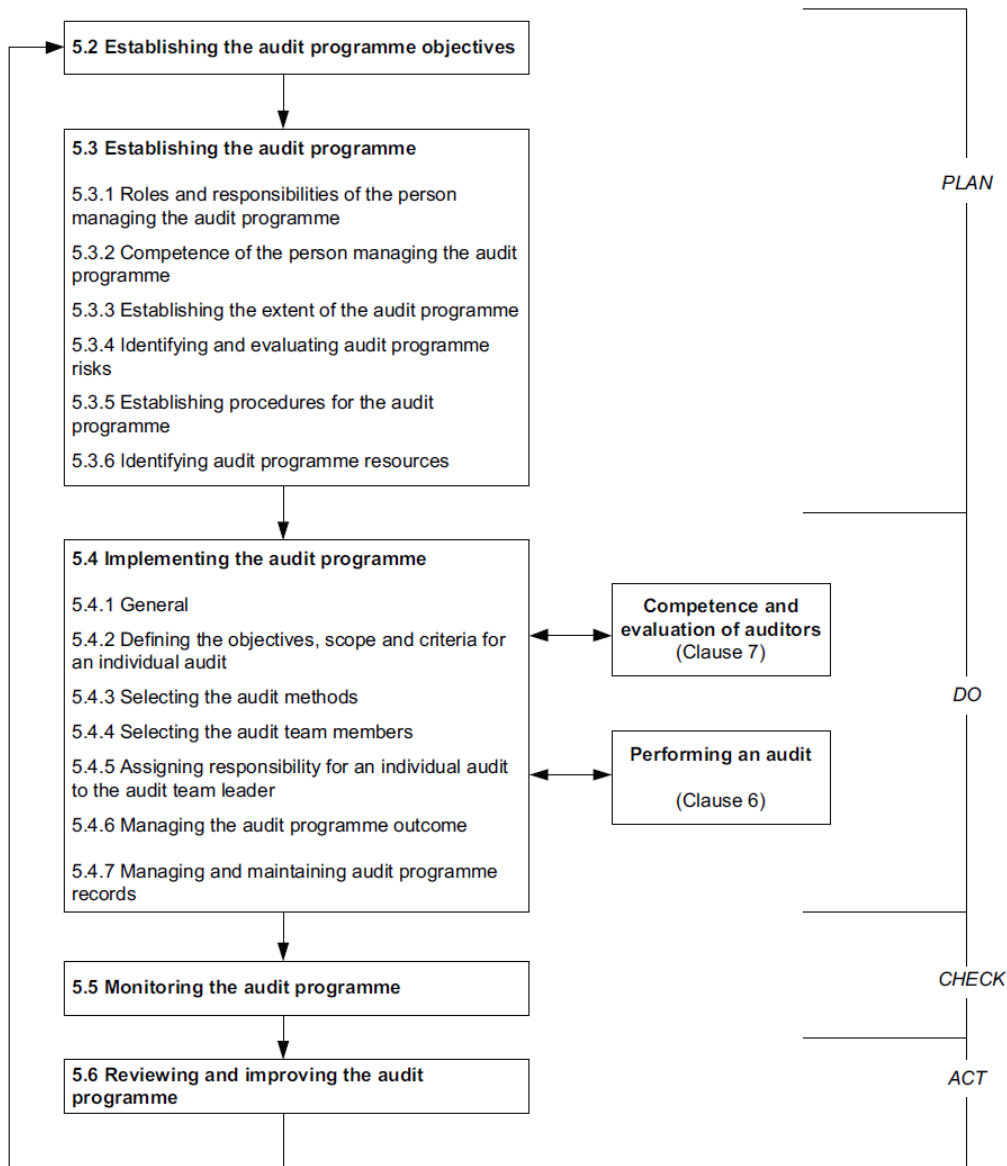
Condition Number	Condition	Section that addresses this condition
A32	An Environmental Audit Program for annual independent environmental auditing against the terms of this approval must be prepared in accordance with AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems and submitted to the Secretary for information no later than one (1) month before the commencement of construction.	This document
A33	The Environmental Audit Program, as submitted to the Secretary, must be implemented and complied with for the duration of construction and for the first two years of operation.	Section 4.2
A34	All independent environmental audits of the CSSI must be conducted by a suitably qualified, experienced and independent team of experts in auditing and be documented in an Environmental Audit Report which: <ul style="list-style-type: none"> (a) assesses the environmental performance of the CSSI, and its effects on the surrounding environment; (b) assesses whether the project is complying with the terms of this approval; and (c) recommends measures or actions to improve the environmental performance of the CSSI. 	Section 4

Condition Number	Condition	Section that addresses this condition
A35	The Proponent must submit a copy of the Environmental Audit Report to the Secretary with a response to any recommendations contained in the audit report within six (6) weeks of completing the audit.	Section 4, Section 5
B11	<p>A website providing information in relation to the CSSI must be established before commencement of works and maintained for the duration of works, and for a minimum of 12 months following the completion of construction of the CSSI or other timeframe as agreed with the Secretary. The following up-to-date information (excluding confidential, private and commercial information) must be published prior to the works commencing and maintained on the website or dedicated pages:</p> <ul style="list-style-type: none"> (a) information on the current implementation status of the CSSI and monthly updates on proposed works to be undertaken in the upcoming month; (b) a copy of the documents listed in Condition A1 of this approval, and any documentation relating to any modifications made to the CSSI or the terms of this approval; (c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval; and (d) a copy of the EPL, EPBC approval, any licences and approvals under the Water Management Act 2000, and any approvals to close level crossings. <p>Where a condition(s) of this approval requires a document(s) to be prepared prior to a work or construction or operational activity being undertaken, a current copy of the relevant document(s) must also be published on the website before the work / activity is undertaken.</p>	This document

Environmental auditing will be undertaken by an independent environment auditor in accordance with ISO 19011:2014 – Guidelines for Auditing Management Systems and the Environmental Audit Program. The EAP will be submitted to the DPE Secretary and will be implemented and complied with for the duration of project construction and for the first two years of operation.

Figure 1 outlines the process for implementation of the EAP.

Figure 1 Process flow for the management of P2N EAP (from AS/NZS ISO 19011:2014)



3. OBJECTIVES

The objectives of the EAP are to:

1. Assess the environmental performance of the P2N project and its effects on the surrounding environment **(environmental performance objective)**
2. Recommend measures or actions to improve environmental performance **(environmental performance objective)**
3. Assess compliance of the P2N project against the Infrastructure Approval SSI 7475 **(compliance objective)**

Objectives 1) and 2) are considered environmental performance objectives and Objective 3) is a compliance objective. The EAP will focus on environmental performance objectives 1) and 2), while other compliance processes established by the MCoA as shown in Table 2 Section 3.1 will be used to demonstrate compliance with Objective 3.

3.1. Minister’s Conditions of Approval Auditing and Compliance Objectives

Other project approval conditions also provide auditing and compliance verification, including the appointment and function of the Environmental Representative (Conditions A15-A21), Compliance Tracking Program (A22-A24), Construction Compliance Reporting (A25-A29) and Pre-Operation Compliance Report (A30-A31). The outputs from these administrative requirements will be utilised by independent auditing under this EAP to avoid replication and focus the scope of the audits to environmental performance improvement. The relationship between the EAP Objectives and compliance reporting processes are shown in Table 2. Independent auditing activities are detailed in Table 3.

Table 2 Audit Objectives and relationship with compliance processes prescribed by the MCoA

Condition	Description	Relevant Audit Objective (number)
A19	<p>For the duration of the works until the completion of construction, the approved ER must:</p> <ul style="list-style-type: none"> a) receive and respond to communication from the Secretary in relation to the environmental performance of the CSSI; b) consider and inform the Secretary on matters specified in the terms of this approval; c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; d) review documents identified in Conditions in Conditions C1, C4 and C12 and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: e) make a written statement to this effect before submission of such documents to the Secretary (if those documents are required to be approved by the Secretary); or f) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Secretary / Department for information or are not required to be submitted to the Secretary/Department); g) regularly monitor the implementation of the documents listed in Conditions C1, C4 and C12 to ensure implementation is being carried out in accordance with the document and the terms of this approval; h) as may be requested by the Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A32 of this approval; i) as may be requested by the Secretary, assist the Department in the resolution of community complaints; j) assess the impacts of minor ancillary facilities comprising lunch sheds, office sheds, material lay down sites, areas used to assemble culverts and turnouts, and portable toilet facilities as required by Condition C21 of this approval; 	Compliance (3) and Environmental Performance (1,2)

Condition	Description	Relevant Audit Objective (number)
	<ul style="list-style-type: none"> k) prepare and submit to the Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading “Environmental Representative Monthly Reports.” The Environmental Representative Monthly Report must be submitted within seven (7) calendar days following the end of each month for the duration of the ER’s engagement for the CSSI; and l) consider any minor amendments to be made to the CEMP, CEMP Sub-plans and monitoring programs that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the CEMP, CEMP Sub-plans and monitoring programs approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; 	
A22	A Compliance Tracking Program to monitor compliance with the terms of this approval must be prepared, taking into consideration any staging of the CSSI that is proposed in a Staging Report submitted in accordance with Condition A10 and Condition A11 of this approval	Compliance (3)
A23	The Compliance Tracking Program must be endorsed by the ER and then submitted to the Secretary for information at least one (1) month prior to the commencement of works	Compliance (3)
A25	A Pre-Construction Compliance Report must be prepared and submitted to the Secretary for information no later than one (1) month before the commencement of construction (or each stage of construction identified in the Staging Report).	Compliance (3)
A28	<p>Construction Compliance Reports must be prepared and submitted to the Secretary for information every six (6) months from the date of the commencement of construction, for the duration of construction. The Construction Compliance Reports must include:</p> <ul style="list-style-type: none"> a) a summary of the project activities that occurred during the reporting period; b) a results summary and analysis of environmental monitoring; c) the number of any complaints received, including a summary of main areas of complaint, action taken, response given and proposed strategies for reducing the recurrence of such complaints; d) details of any review of, and minor amendments made to, the CEMP as a result of construction carried out during the reporting period; e) a register of any consistency assessments undertaken and their status; f) results of any independent environmental audits carried out in accordance with Conditions A32 to A35 and details of any actions taken in response to the recommendations of an audit; 	Compliance (3)

Condition	Description	Relevant Audit Objective (number)
	<ul style="list-style-type: none"> g) a summary of all incidents notified in accordance with Condition A36 and Condition A39 of this approval; and h) a compliance status summary for the reporting period including details of any non-compliances with the terms of this approval. 	
A30	<p>A Pre-Operation Compliance Report must be prepared and submitted to the Secretary for information no later than one (1) month before the commencement of operation. The Pre-Operation Compliance Report must include:</p> <ul style="list-style-type: none"> a) details of how the terms of this approval that must be addressed before the commencement of operation have been complied with; and b) the commencement date for operation. 	Compliance (3)
A32	<p>An Environmental Audit Program for annual independent environmental auditing against the terms of this approval must be prepared in accordance with AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems and submitted to the Secretary for information no later than one (1) month before the commencement of construction.</p>	Compliance (3)
A33	<p>The Environmental Audit Program, as submitted to the Secretary, must be implemented and complied with for the duration of construction and for the first two years of operation.</p>	Compliance (3)
A34	<p>All independent environmental audits of the CSSI must be conducted by a suitably qualified, experienced and independent team of experts in auditing and be documented in an Environmental Audit Report which:</p> <ul style="list-style-type: none"> (a) assesses the environmental performance of the CSSI, and its effects on the surrounding environment; (b) assesses whether the project is complying with the terms of this approval; and (c) recommends measures or actions to improve the environmental performance of the CSSI. 	Compliance (3) and Environmental Performance (1,2)
A35	<p>The Proponent must submit a copy of the Environmental Audit Report to the Secretary with a response to any recommendations contained in the audit report within six (6) weeks of completing the audit.</p>	Compliance (3)
C2	<p>The CEMP must provide:</p> <ul style="list-style-type: none"> (a) a description of activities to be undertaken during construction (including the indicative scheduling of construction, and details on the layout and activities to be undertaken at each major construction ancillary facility); (b) details of environmental policies, guidelines and principles to be followed in the construction of the CSSI; (c) a schedule for compliance auditing; 	Environmental Performance (1,2)

Condition	Description	Relevant Audit Objective (number)
	<p>(d) a program for ongoing analysis of the key environmental risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of the CSSI;</p> <p>(e) details of how the activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the EIS and Submissions Report; and</p> <p>(ii) manage the risks identified in the risk analysis undertaken in subsection (d) of this condition;</p> <p>(f) an inspection program detailing the activities to be inspected and frequency of inspections;</p> <p>(g) a protocol for managing and reporting any:</p> <p>(i) incidents; and</p> <p>(ii) non-compliances with this approval and with statutory requirements;</p> <p>(h) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction;</p> <p>(i) a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C4. Where staged construction of the CSSI is proposed, the CEMP must also identify which CEMP Sub-plan in applies to each of the proposed stages of construction;</p> <p>(j) a description of the roles and environmental responsibilities for relevant employees and their relationship with the ER;</p> <p>(k) for training and induction for employees, including contractors and sub-contractors, in relation to environmental and compliance obligations under the terms of this approval; and</p> <p>(l) for periodic review and update of the CEMP and all associated plans and programs.</p>	
D2	<p>An OEMP is not required for the CSSI if the Proponent has an Environmental Management System (EMS) or equivalent as agreed with the Secretary, and can demonstrate, to the written satisfaction of the Secretary, that through the EMS:</p> <p>(a) the performance outcomes, commitments and mitigation measures, made and identified in the EIS and Submissions Report, and terms of this of approval can be achieved;</p> <p>(b) issues identified through ongoing risk analysis can be managed; and</p> <p>(c) procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.</p>	Environmental Performance (1,2)

Other internal compliance auditing of the CEMP during construction (as per approval condition C2) will be the responsibility of the Principal Contractor. Internal auditing may be used as evidence for independent audits as defined in Table 3.

4. IMPLEMENTATION

4.1. Roles and Responsibilities

4.1.1. Audit Environmental Compliance Advisor

The Audit Environmental Compliance Advisor will have responsibility for management and implementation of the EAP for P2N. This includes:

- Refine and confirm the extent of the P2N EAP;
- Identification and mitigation of audit program risks;
- Selection and engagement of auditors;
- Managing the audit outcomes and corrective actions; and
- Maintenance of audit program records, project information security and confidentiality.

4.1.2. Project Environmental Advisor

The Project Environmental Advisor will:

- Refine and confirm the extent of the P2N EAP with the Environmental Compliance Advisor;
- Prepare and collate information for the audit team as required;
- Participate in the individual audits;
- Be responsible for dissemination of EAP reports to the audit team and DPE; and
- Lead the uptake of corrective actions to address non-conformances and opportunities for improvement identified by the individual audit.

4.1.3. Contractor's Environmental Manager

The Contractor's Environmental Manager will:

- Participate in the independent audits;
- Provide information to the audit team as directed by the Project Environmental Advisor; and
- Implement corrective actions as identified by the independent audits.

4.1.4. Environmental Representative

The Environmental Representative will:

- Provide information to the audit team as requested; and
- Monitor and assist the Project Environmental Advisor with the uptake of mitigation and improvement measures.

4.2. Proposed Independent Audit Scope and Timing

A minimum of three annual independent environmental audits will be undertaken based on the proposed P2N construction timeframe of around 18 months. The exact timing of audits will align with project delivery and completion.

Each independent environmental audit will generate an audit report to be provided to DPE within six weeks of completing the audit in accordance with Condition A35.

Table 3 Independent Environmental Audit Schedule and Scope.

Independent Audit	Scope	Timing	Responsibility
During Construction	MCoA Conditions (Construction)	Mid 2019	ARTC Inland Rail and Contractor
Post-Construction; 1st year of Operation	MCoA Conditions (Operational), OEMP/ System operation and implementation	Mid 2020	ARTC Inland Rail
2nd year Operation	MCoA Conditions (Operational), OEMP/ System operation and implementation	Mid 2021	ARTC Inland Rail

4.3. Audit team

The Environmental Compliance Advisor will engage the audit team and will ensure the program is an effective and reliable tool, by providing information on which ARTC, the Inland Rail Programme and P2N project can act improve its performance.

The audit team must be appropriately qualified and experienced in environmental auditing, with experience in undertaking infrastructure construction audits. An independent environmental auditor will be engaged to undertake the independent environmental audits and assess compliance and environmental performance of the project against the project approval and the objectives defined in Section 3.

5. MONITORING AND REVIEWING THE P2N ENVIRONMENTAL AUDIT PROGRAM

The Audit Environmental Compliance Advisor and Project Environmental Advisor will review the independent audit reports and provide feedback to the audit team on:

- Conformity with EAP objectives in Section 3;
- Reviewing root cause of environmental breaches or impacts;
- Reviewing and the effectiveness of corrective or preventative actions with the objective to identifying them as complete;
- Assessing the performance of audit team including implementation of the audit;
- Feedback from ARTC, Contractors and other interested parties.

This information will be provided to the independent audit team for their consideration in the audit report.

The Audit Environmental Compliance Advisor should review the overall implementation of the audit program following the 1st and 2nd individual audit identified in Table 2. Where required, the program will be amended as necessary.