Absolute
CIVIL CONTRACTING

INTEGRATED MANAGEMENT SYSTEM

Environmental Management Plan

Environmental protection requirements for all Absolute Civil Contracting operations and construction projects

Document number	ACC-IMS-EMP-001
Revision	1 — Issued for use
Effective date	29/10/2026
Next scheduled review	29/10/2027
Document owner	Peter Nikolovski, Director
Aligned to	ISO 14001:2026; Protection of the Environment Operations Act 1997 (NSW); Transport for NSW G36 Environmental Protection and G38 Soil and Water Management; Managing Urban Stormwater: Soils and Construction (the "Blue Book")

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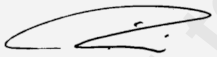
Document control

Approval

Role	Name	Position	Signature	Date
Prepared by	Peter Nikolovski	Director		29/10/2026
Reviewed by	Peter Nikolovski	Director (IMS Representative)		29/10/2026
Approved by	Peter Nikolovski	Director		29/10/2026

Revision history

Rev	Date	Description of change	Approved
0	01/04/2026	First issue for use across all Absolute Civil Contracting operations and projects.	Peter Nikolovski
1	29/10/2026	Full review. Aligned with ISO 14001:2026: wider environmental conditions, life-cycle perspective on aspects, externally provided processes and planning of changes. Forms F13 and F14 issued.	Peter Nikolovski

Distribution and control

The controlled copy of this document is the electronic version held in the ACC IMS document register. Printed copies are uncontrolled and are valid only on the day of printing. Personnel must confirm they are using the current revision before relying on this document.

Copy	Holder	Format
Master (controlled)	Peter Nikolovski, Director	Electronic — IMS document register
Project copies	Project Manager / Site Supervisor for each project	Electronic, or printed copy marked "Uncontrolled"
Client copies	Issued on request or where required by contract	PDF transmitted under document transmittal

Related documents

Document number	Title
ACC-IMS-MAN-001	Integrated Management System Manual
ACC-IMS-QMP-001	Quality Management Plan
ACC-IMS-WHS-001	Work Health and Safety Management Plan

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1. Purpose and scope

This Environmental Management Plan (EMP) sets out how Absolute Civil Contracting (ACC) prevents pollution, protects the natural and cultural environment, and complies with environmental laws, approvals and contract requirements. It implements the environmental requirements of the IMS Manual (ACC-IMS-MAN-001) and ISO 14001, and is structured to satisfy contracts let under TfNSW Specifications G36 and G38 and equivalent council and utility requirements.

This EMP applies to all ACC projects, sites, compounds, stockpiles and access routes, and to all workers and subcontractors. Where a contract requires a Construction Environmental Management Plan (CEMP) or sub-plans, they are prepared from this EMP and the project's planning approval conditions, and submitted for client review before work starts.

1.1 Environmental objectives

- Zero pollution incidents and zero regulatory penalty notices or prosecutions.
- Erosion and sediment controls installed before ground disturbance, inspected weekly and within 24 hours of rainfall of 10 mm or more.
- Turbid water discharged only when it meets the discharge criteria in section 6.3.
- No unapproved clearing of vegetation and no harm to threatened species or Aboriginal heritage.
- At least 80% by mass of construction and demolition waste reused or recycled.
- All community complaints acknowledged within 1 working day.

2. Legal and other requirements

Instrument	Key obligations for ACC
Protection of the Environment Operations Act 1997 (NSW)	Do not pollute waters (s 120); control air and noise; manage waste lawfully; notify pollution incidents that cause or threaten material harm immediately (Part 5.7); comply with any Environment Protection Licence (EPL)
Protection of the Environment Operations (General) Regulation 2022 and (Waste) Regulation 2014 (NSW)	Pollution Incident Response Management Plans for EPL holders; waste classification, tracking and transport; resource recovery orders and exemptions
Environmental Planning and Assessment Act 1979 (NSW)	Comply with development consent, review of environmental factors (REF) and approval conditions
Biodiversity Conservation Act 2016 (NSW)	Do not harm threatened species, populations or ecological communities, or damage their habitat, without authorisation
Biosecurity Act 2015 (NSW)	General biosecurity duty — prevent, eliminate or minimise biosecurity risks, including the spread of weeds, pathogens and pests
National Parks and Wildlife Act 1974 (NSW)	Do not harm Aboriginal objects or places; protected native animals
Heritage Act 1977 (NSW)	Protect heritage items and relics; report unexpected finds of relics
Contaminated Land Management Act 1997 (NSW)	Duty to report land contamination to the EPA where required
Fisheries Management Act 1994 (NSW)	Permits for dredging, reclamation and works obstructing fish passage; protection of marine vegetation

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Instrument	Key obligations for ACC
Water Management Act 2000 (NSW)	Approvals for controlled activities on waterfront land and for water take, including dewatering where required
Environment Protection and Biodiversity Conservation Act 1999 (Cth)	Protection of matters of national environmental significance
Managing Urban Stormwater: Soils and Construction, Volume 1 (Landcom 2004) and Volume 2 series	Design, installation and maintenance of erosion and sediment controls
TfNSW G36, G38, G40 and associated guidelines	Contract environmental protection, soil and water, and clearing requirements on TfNSW projects

Project-specific approvals, licences and conditions are listed in the project compliance register, with the person responsible and evidence of compliance.

3. Responsibilities

Role	Environmental responsibilities
Director	Approves this EMP and project CEMPs; provides resources; notifies regulators of pollution incidents; reviews environmental performance; may stop any work
Project Manager	Prepares the CEMP, sub-plans and ESCPs; obtains permits and approvals; maintains the compliance register; ensures environmental controls are installed before work; manages complaints; investigates incidents; may stop work
Site Supervisor	Installs and maintains environmental controls; conducts environmental inspections; tests water before discharge; manages spills; briefs workers at pre-starts; reports incidents immediately; may stop work
Workers and subcontractors	Follow environmental controls and instructions; stay within approved work areas; report spills, unexpected finds and damage to controls immediately; stop work if environmental harm is occurring

4. Environmental aspects and impacts

Environmental aspects of ACC work are identified at tender and project start-up and assessed using the IMS risk matrix. ACC takes a life-cycle perspective: it considers the environmental effects of the materials it buys (for example, specifying recycled aggregates and lower-carbon concrete where the specification allows), how the work is built, and how the finished asset will be maintained and eventually removed. ACC also considers how environmental conditions — climate change, flooding, drought, pollution and biodiversity loss — can affect its work and its controls. Aspects of externally provided processes, products and services (subcontractors, plant hire, material suppliers and waste contractors) are controlled through the procurement requirements in the IMS Manual. The significant aspects for typical ACC civil works are:

Activity	Aspect	Potential impact	Risk before controls
Earthworks, stripping and stockpiling	Erosion and sediment runoff	Turbid water in drains and waterways; smothering of aquatic habitat	**High**

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Activity	Aspect	Potential impact	Risk before controls
Dewatering of excavations	Discharge of turbid or contaminated water	Water pollution	**High**
Plant refuelling and maintenance	Fuel, oil and chemical spills	Soil and water contamination	**High**
Concrete work	Concrete washout and slurry	High-pH water pollution	**High**
Clearing and works near vegetation	Removal of or damage to vegetation and habitat	Loss of biodiversity; harm to fauna; spread of weeds	**Medium**
Excavation	Disturbance of Aboriginal objects or heritage relics	Irreversible loss of cultural heritage	**Medium**
Excavation of fill or old sites	Disturbance of contaminated land or acid sulfate soils	Soil and water contamination; health risk	**Medium**
Haulage and earthworks	Dust generation	Nuisance to neighbours; health effects	**Medium**
Plant operation, rock breaking, compaction	Noise and vibration	Community nuisance; damage to structures	**Medium**
All activities	Waste generation	Landfill use; illegal dumping; pollution	**Medium**
Works in or near waterways	Instream disturbance; obstruction of fish passage	Water quality and aquatic habitat impacts	**High**

5. Erosion and sediment control

5.1 Principles

Erosion and sediment control follows the Blue Book and, on TfNSW projects, Specification G38:

- minimise the area of disturbance and the time it is exposed;
- divert clean water around disturbed areas;
- install sediment controls before ground disturbance starts in each catchment;
- stabilise disturbed areas progressively, and within 10 working days of completing works in an area unless the contract specifies a shorter period;
- maintain controls so that they function at their design capacity at all times.

5.2 Erosion and Sediment Control Plans

A progressive ESCP is prepared by a competent person for each stage of work before disturbance. It shows site catchments and drainage, clean and dirty water diversions, sediment fences, check dams, sediment basins (where required), stabilised site access, stockpile locations, inlet protection and stabilisation methods. ESCPs are updated as the work progresses and are kept on site.

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5.3 Standard controls

Control	Requirement
Stabilised site access	Rumble grid or crushed rock pad at each exit point; sediment tracked onto public roads removed by the end of each day, by sweeping not washing
Sediment fences	Installed on the contour with fabric toed in at least 150 mm; maintained when sediment reaches one third of the fence height
Stockpiles	Located at least 5 m from hazard areas, drains and the top of batters, and at least 40 m from waterways where practicable; sediment fence on the downslope side; covered or stabilised if in place for more than 10 working days
Drainage inlet protection	Installed on all stormwater inlets that may receive runoff from the works
Check dams and diversion drains	Spaced and sized to Blue Book requirements; maintained after each rain event
Sediment basins	Designed to Blue Book criteria where catchment disturbance exceeds the threshold for a basin; flocculated and tested before discharge; maintained to retain design capacity

5.4 Inspections

The Site Supervisor inspects all erosion and sediment controls at least weekly, before forecast rain where practicable, and within 24 hours after rainfall of 10 mm or more in 24 hours. Defects are repaired as soon as practicable and no later than the end of the next working day.

6. Water quality and dewatering

6.1 General controls

- No material, sediment, concrete, chemicals, fuel or wastewater may enter drains, gutters or waterways.
- Concrete washout is done only in a designated, lined washout area; cured residue is disposed of as waste.
- Saw-cutting slurry is captured by vacuum or bunding and disposed of lawfully.
- Plant is not washed within 40 m of a waterway or where washwater can enter drains.

6.2 Works in or near waterways

Works in or within 40 m of a waterway are planned to obtain any required approvals under the Water Management Act 2000 and the Fisheries Management Act 1994 before work starts, to maintain fish passage, to isolate the work area from flowing water, and to stabilise banks promptly.

6.3 Dewatering and discharge criteria

Water from excavations, sediment basins and work areas is only discharged after it has been tested and meets the following criteria, unless the EPL, approval or contract specifies different limits:

Parameter	Discharge criterion	Test method
Total suspended solids (TSS)	Less than 50 mg/L (or the equivalent turbidity value established by site-specific correlation)	Turbidity meter correlated to laboratory TSS

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Parameter	Discharge criterion	Test method
pH	6.5 to 8.5	Calibrated pH meter
Oil and grease	No visible oil or grease	Visual inspection
Other	No visible litter or floating material	Visual inspection

Each discharge is authorised by the Site Supervisor and recorded in the water discharge register with the date, location, volume, test results and receiving point. Water that does not meet the criteria is treated (for example, flocculated or pH-adjusted) and re-tested, reused on site for dust suppression where suitable, or removed by a licensed liquid waste contractor.

7. Air quality and dust

- Water carts or sprays are used on haul roads, stockpiles and work areas when dust is visible leaving the work area.
- Loaded trucks are covered when leaving site.
- Speed limits on unsealed haul roads are set at 20 km/h or less.
- Work generating dust is modified or stopped during high winds when dust cannot be controlled.
- Disturbed areas are stabilised progressively.
- Plant is maintained to prevent excessive exhaust emissions, and idling is minimised.
- No burning of waste or vegetation is permitted on site.

8. Noise and vibration

8.1 Working hours

Unless the approval or contract states otherwise, construction work is carried out within the standard hours recommended by the NSW EPA construction noise guidance:

Day	Standard construction hours
Monday to Friday	7:00 am to 6:00 pm
Saturday	8:00 am to 1:00 pm
Sunday and public holidays	No work

Work outside these hours requires approval from the relevant authority and the client, an out-of-hours work assessment, and notification to affected residents at least 5 working days beforehand.

8.2 Controls

- Select the quietest suitable plant; fit and maintain mufflers and engine covers.
- Use broadband ("quacker") reversing alarms where permitted.
- Locate noisy plant and stockpiles away from sensitive receivers; use site sheds and stockpiles as barriers.
- Schedule the noisiest work (rock breaking, saw cutting, piling) for the middle of the day and provide respite periods.

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- Assess vibration risk before work near buildings, heritage items and sensitive structures, conduct dilapidation surveys where required, and select methods that keep vibration within safe limits.

9. Flora, fauna and biosecurity

- Clearing is limited to the approved area, which is clearly marked on site with "no-go" fencing or flagging before work starts.
- Trees to be retained are protected with tree protection zones in accordance with AS 4970 Protection of trees on development sites.
- Pre-clearing surveys by a suitably qualified ecologist are completed where required, and hollow-bearing trees are felled under supervision.
- If injured or trapped fauna is found, work stops in the area and a licensed wildlife carer (for example, WIRES or the local wildlife rescue service) is contacted.
- If a threatened species is found that was not identified in the approval, work in the area stops and the Project Manager seeks advice before resuming.
- Plant and equipment arriving on site are clean and free of soil and plant material. Weed-infested areas are identified, and plant leaving them is cleaned to prevent the spread of weeds and pathogens, consistent with the general biosecurity duty.

10. Aboriginal and non-Aboriginal heritage

Known heritage items within or near the work area are identified at project start-up, marked on site plans and protected with no-go zones.

Unexpected heritage find procedure

1. Stop work immediately in the area of the find and do not move or disturb the item.
2. Establish a protective buffer of at least 10 m around the find with barrier fencing.
3. Notify the Site Supervisor, who notifies the Project Manager and Director immediately.
4. ACC notifies the client and the relevant NSW heritage regulator (Aboriginal objects through the Environment Line on 131 555; historical relics as required by the Heritage Act 1977).
5. If suspected human remains are found, stop work, secure the area and notify NSW Police immediately.
6. Work does not resume in the area until written clearance is received from the client and the relevant authority.

11. Contaminated land and acid sulfate soils

- Available site history, contamination reports and acid sulfate soil maps are reviewed before excavation. On the NSW South Coast, low-lying estuarine and floodplain areas are a known acid sulfate soil risk.
- Where acid sulfate soils are present, they are managed under an acid sulfate soil management plan (including neutralisation with agricultural lime, monitoring of pH and controlled stockpiling).
- Unexpected contamination (odours, staining, buried waste, drums, suspected asbestos) is managed by stopping work, isolating the area, notifying the Project Manager, and engaging a qualified contamination consultant. ACC reports contamination to the EPA where the Contaminated Land Management Act 1997 requires it.

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- Excavated material is classified under the NSW EPA Waste Classification Guidelines before it leaves site.

12. Hazardous substances and spill response

- Fuels and chemicals are stored in bunded areas or self-bunded containers with capacity of at least 110% of the largest container, at least 40 m from waterways and drainage lines where practicable.
- Refuelling is done in designated areas using drip trays and spill-proof nozzles, and is never left unattended.
- Spill kits suited to the substances on site are kept at storage areas, refuelling points and in service vehicles. Workers are trained in their use.

Spill response

1. Stop the source if safe to do so.
2. Contain the spill using the spill kit, and protect drains and waterways.
3. Clean up and place contaminated material in labelled containers for lawful disposal.
4. Report to the Site Supervisor immediately, and record in the incident register.
5. If the spill causes or threatens material harm to the environment, the Director notifies the EPA immediately on 131 555 and the other relevant authorities, as required by Part 5.7 of the POEO Act.

13. Waste and resource management

ACC applies the waste hierarchy: avoid, reduce, reuse, recycle, recover energy, and dispose only as a last resort.

- Excavated natural material, crushed concrete and asphalt are reused on site where they meet specification and applicable resource recovery orders and exemptions.
- Waste is segregated on site into general, recyclable (metal, timber, concrete, green waste) and hazardous streams.
- All waste leaving site is classified in accordance with the NSW EPA Waste Classification Guidelines, transported by licensed transporters where required, and taken only to facilities lawfully able to receive it.
- Dockets for all waste and recycled material movements are kept in the waste register.
- Asbestos and other hazardous wastes are tracked as required by the POEO (Waste) Regulation.
- Littering and illegal dumping are prohibited. Sites are kept tidy and bins are covered.

14. Community engagement and complaints

- Affected residents and businesses are notified at least 5 working days before work that will disrupt access, generate significant noise, or occur outside standard hours, unless the contract specifies otherwise.
- Site signage displays ACC's contact details for enquiries and complaints.
- Complaints are recorded in the complaints register, acknowledged within 1 working day, investigated, and responded to within 5 working days. Corrective actions are taken where the complaint is substantiated.

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- Where the contract requires, community communication is coordinated through the client.

15. Environmental incidents and emergencies

An environmental incident is any event that causes, or has the potential to cause, harm to the environment or a breach of an approval or licence. All environmental incidents are reported immediately to the Site Supervisor and recorded within 24 hours. The Director decides on notification to the EPA and other authorities, and the client is notified as the contract requires. Pollution incidents causing or threatening material harm are notified immediately, as required by the POEO Act. Incidents are investigated and corrective actions tracked in accordance with the IMS Manual.

Site emergency plans address environmental emergencies including spills, uncontrolled discharges, sediment basin failure, fire and flooding.

16. Inspections, monitoring and audit

Activity	Frequency	Responsible	Record
Environmental site inspection	Weekly	Site Supervisor	Environmental inspection checklist
Erosion and sediment control inspection	Weekly and within 24 hours of 10 mm or more of rain	Site Supervisor	ESC inspection record
Water quality testing	Before every discharge	Site Supervisor	Water discharge register
Noise or vibration monitoring	Where required by approval or in response to complaints	Project Manager	Monitoring report
Waste tracking	Each movement	Site Supervisor	Waste register and dockets
Compliance register review	Monthly	Project Manager	Compliance register
Environmental internal audit	At least once per project longer than three months, and annually for the system	Competent auditor	Audit report

Environmental performance is reported monthly to the Director and reviewed at management review.

17. Training and awareness

All workers receive environmental awareness training at induction covering this EMP, site-specific environmental risks and no-go zones, erosion and sediment control, spill response, unexpected finds, waste segregation, and incident reporting. Toolbox talks reinforce environmental topics, particularly before forecast rain and when work moves into a new area. Site Supervisors and plant operators working on disturbed land receive erosion and sediment control training.

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18. Cross-reference to ISO 14001 and TfNSW G36/G38

Topic	ISO 14001:2026 clause	TfNSW reference	EMP section
Environmental aspects	6.1.2	G36	4
Compliance obligations	6.1.3	G36	2
Roles and responsibilities	5.3	G36	3
Operational control — soil and water	8.1	G38	5, 6
Operational control — air, noise, flora, fauna, heritage, waste	8.1	G36, G40	7 to 13
Emergency preparedness and response	8.2	G36	12, 15
Monitoring and evaluation of compliance	9.1	G36, G38	16
Competence and awareness	7.2, 7.3	G36	17
Nonconformity and corrective action	10.2	G36	15

This EMP is aligned with ISO 14001:2026 (published 15/04/2026). Where ACC seeks certification, the certification body will audit against this edition within the accreditation transition period, which ends in 2029.

Authorisation

This Environmental Management Plan is authorised for use by Absolute Civil Contracting Pty Ltd and applies to all ACC operations, projects, workers and subcontractors.

Signed: _____ Peter Nikolovski, Director Date: 29/10/2026

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