



Preliminary Construction Environmental Management Plan

Yathroo Wind Farm

FINAL

July 2025

NEOEN

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Yathroo Wind Farm

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Prepared by
Umwelt (Australia) Pty Limited

On behalf of
Neoen (Australia) Pty Ltd

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Acknowledgement of Country

Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky.

We pay our respects to Elders past and present.

The below image is from the artwork *Yapung Maryiyang* (Pathway Forward) by Saretta Fielding.



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Abbreviations

Abbreviations	Definition
ACHIS	Aboriginal Cultural Heritage Information System
ABS	Australian Bureau of Statistics
BESS	Battery Energy Storage System
CEMP	Construction Environmental Management Plan
Contractor CEMP	Contractor Construction Environmental Management Plan
DPLH	Department of Planning Lands and Heritage
DPIRD	Department of Primary Industries and Regional Development
DWER	Department of Water and Environmental Regulation
EPC	Engineering, Procurement and Construction
EPA	Environmental Protection Authority
EP Act	Environmental Protection Act 1986
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
GDEs	Groundwater Dependant Ecosystems
HS&E	Health, Safety and Environment
IPAC	Invasive Plants and Animals Committee
MSDS	Material Safety Data Sheet
Neoen	Neoen Australia Pty Ltd
Operational EMP	Operational Environmental Management Plan
OSOM	Oversize Overmass
VTs	Vegetation Types
WA	Western Australia
WA BAM Act	Biosecurity and Agriculture Management Act (2007)
WoNS	Weeds of National Significance

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1.0 Introduction

1.1 Project Background

Neoen Australia Pty Ltd (Neoen) is proposing the development of the Yathroo Wind Farm (the Project) approximately 170 km north of Perth, Western Australia (WA), within the Shire of Dandaragan. The Project will involve the construction and operation of up to 65 wind turbines, a Battery Energy Storage System (BESS), substation and ancillary infrastructure.

1.2 Purpose

The purpose of this Preliminary Construction Environmental Management Plan (CEMP) is to ensure Project execution and construction:

- establish systems to minimise environmental risks to as low as reasonably practicable
- set management actions and monitoring requirements to meet Project specific environmental performance objectives
- comply with legislative requirements, relevant guidelines, and Project approvals
- guide the main Contractor on what they need to address in their works specific CEMP.

This Preliminary CEMP will support Project approvals and be used as a foundation for the detailed CEMP which will be developed later as the Project progresses to the detailed design phase.

1.3 Scope

The scope of this CEMP primarily applies to the design and construction of the Project. Where commissioning and operational risks are known they will be addressed, however a review of this CEMP will be undertaken at the transition of construction to operations to ensure operational risks are identified and suitable mitigation measures developed.

This CEMP will be used to support approvals, guide design, provide evidence that environmental impacts are being considered and will be appropriately managed, and guide contractors on what they need to address in their specific CEMPs.

The CEMP seeks to:

- Describe the existing environment of the Project Area. The Project Area is approximately 15,617 ha in size and encompasses the area in which the flora and fauna surveys were undertaken, as well as the location of infrastructure to be constructed as part of the Project.
- Provide an overview of Neoen's Environmental Management Framework.
- Account for the environmental impacts that may occur through implementation of the Project.
- Provide guidance on the management measures to be implemented to minimise adverse environmental impacts.

- Ensure works are undertaken in a manner that meets relevant environmental legislation and obligations in approvals documents, including conditions and commitments.
- Provide guidance on the audits and inspections to be undertaken.
- Outline the environmental monitoring and reporting requirements.
- Provide guidance to the main contractor in the preparation of their CEMP, and the site operator in the preparation of their Operational EMP. The primary contractors will be required to develop their own Construction and Operational EMPs specific to their activities and in accordance with the requirements of this CEMP.

2.0 Project Overview

2.1 Project Description

Neoen is proposing the development of the Yathroo Wind Farm in the Wheatbelt region of Western Australia. The Project will have up to 65 wind turbines, a BESS and ancillary Project infrastructure. It will comprise of the following key infrastructure and facilities:

- turbines
- turbine foundations
- hardstands
- electrical connections, substation and grid connection
- underground cabling
- BESS
- operational and maintenance facility
- construction compound, concrete batching plant and laydown areas
- borrow pits/quarries
- permanent meteorological masts
- communication towers
- external site access
- internal access roads
- firewater tanks
- utilities.

2.2 Project Location

The Project is located approximately 170 km north of Perth, in the Wheatbelt Central Coast subregion. The Project infrastructure will be located entirely within the Shire of Dandaragan and will be located across numerous freehold properties that are primarily cleared of native vegetation and used for agriculture.

An existing 132 / 330 kV double circuit transmission line intersects the western boundary of the Project area which will provide network access.

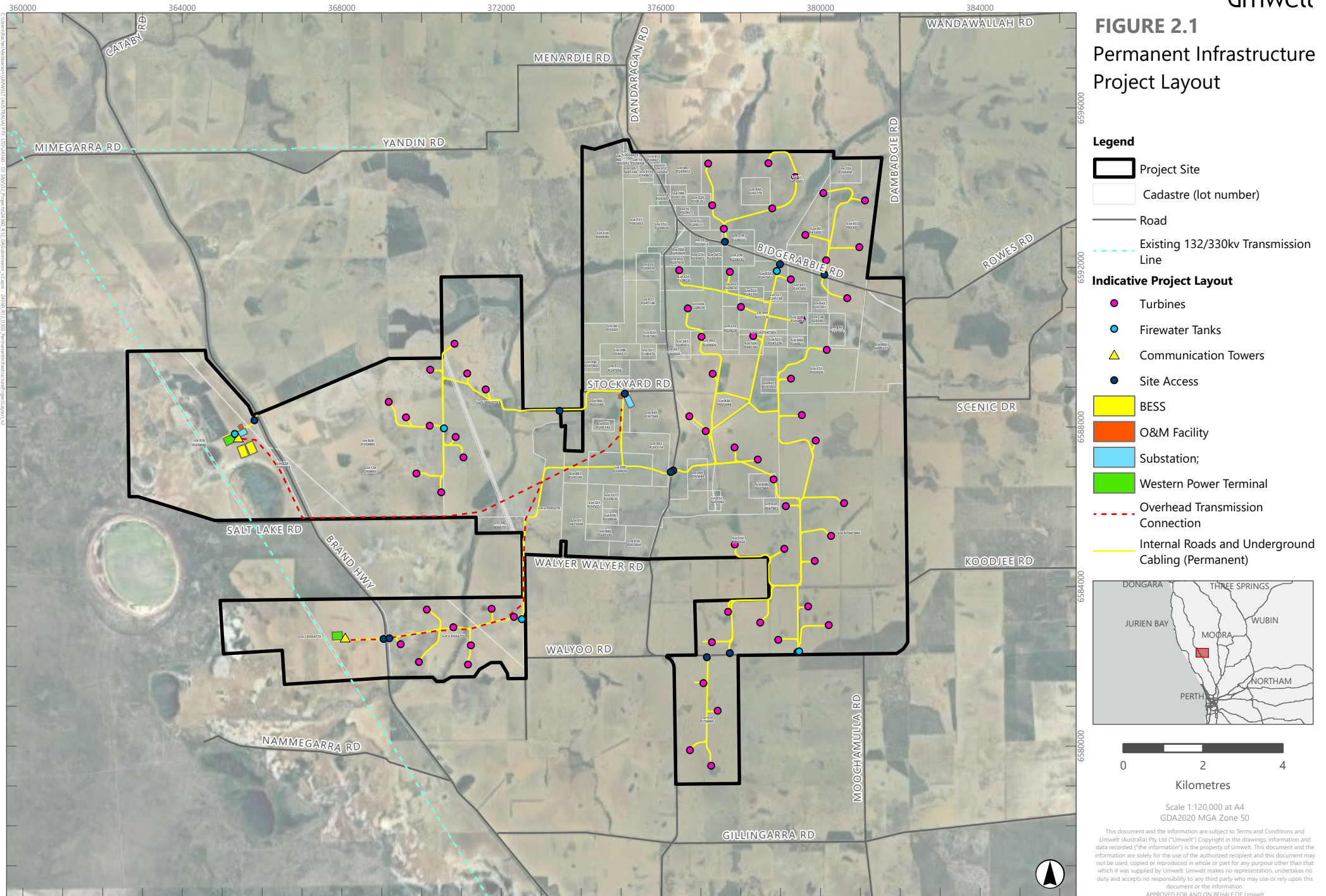
The Project is located within the Intensive Land Use Zone, as defined by the Department of Primary Industries and Regional Development (DPIRD) (DPIRD, 2016). Namming Nature Reserve, and Enemanga Nature Reserves are located southwest and directly west of the Project.

For the purposes of this CEMP, the Project Area refers to the boundaries of all involved land parcels where consent has been granted for development of the Project and wherein all Project infrastructure will be contained. The Project Area is 15,617 ha.

The Indicative Project Footprint refers to the maximum area of land that will be cleared for installation of all Project infrastructure within the Project Area. It is based on the largest possible layout and has been used to calculate the maximum area of native vegetation clearing (15 ha of remnant native vegetation, 5 ha of isolated remnant trees and 8 ha of planted native vegetation). The Indicative Project Footprint is approximately 565 ha.

The Project Area, Indicative Project Footprint and location is shown in **Figure 2.1**.

FIGURE 2.1
Permanent Infrastructure
Project Layout



2.3 Project Staging and Construction

This CEMP has been prepared primarily to address environmental risks at the design, planning, and construction phases, however where environmental risks are known for the commissioning, operations, or decommissioning phases, these will also be addressed.

Project construction will include the following activities:

- site mobilisation
- site preparation including vegetation clearing and topsoil stripping where required
- earthworks and landscaping
- installation of fencing where required
- installation of main and remote firewater tanks
- construction of internal access roads and car parks
- civil works, such as the installation of slabs for infrastructure, cables, water supply, and drainage
- installation of wind turbines
- installation of the BESS compound facility, switchyard, transformers, and substation
- installation of overhead powerlines and associated towers/poles
- installation of buildings, such as control building, offices, maintenance shed, and storage warehouse.

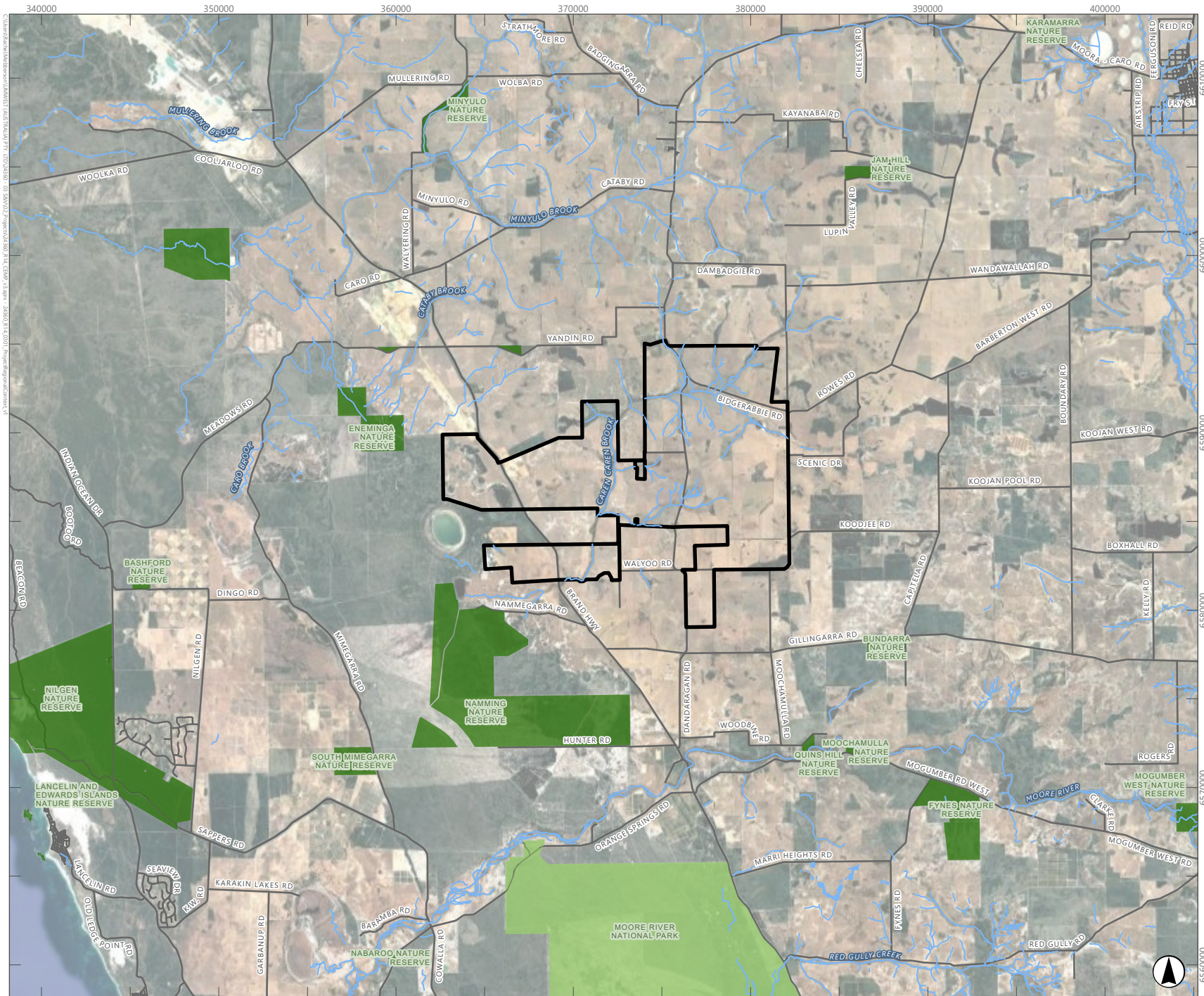
3.0 Existing Environment

3.1 Land Use

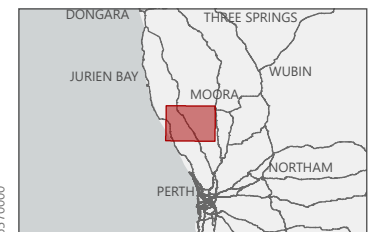
Land use in the Project area consists of land cleared for agriculture and livestock grazing, with interspersed patches of remnant and regrowth woodland that is generally associated with hills and slopes. Key environmental and social receptors in proximity to the Project Area include (**Figure 3.1**):

- Namming Nature Reserve located approximately 1.75 km southwest of the Project.
- Enemunga Nature Reserve located 2 km west of the Project.
- Moore River National Park located approximately 10 km south of the Project.
- Badgingarra National Park located approximately 29 km northwest of the Project.
- A number of existing and proposed wind farms such as:
 - the existing Yandin (Dandaragan) Wind Farm, which is located northwest and shares a boundary with the Project
 - the existing West Hills Wind Farm, which is located to the west of the Project
 - the proposed Karakin Wind Farm, which is located to the southwest of the Project
 - the proposed Waddi Wind Farm, located to the northwest of the Project.
- Part of the Cataby Mineral Sands Mine located within the northwest of the Project Area.
- Cooljarloo Mine situated in the northwest of the Project Area.
- Three significant streams intersecting the Project Area:
 - Caren Caren Brook.
 - Yathroo Brook.
 - The other waterway is unnamed.
- Two registered Aboriginal cultural heritage sites, located within the western-most part of the Project Area.
- The State heritage listed Yathroo Homestead located within the Project Area close to the Northern boundary.
- The small settlement of Dandaragan, located approximately 10 km north of the Project with a population of 292 people (Australian Bureau of Statistics (ABS), 2021).
- The township of Cataby, located around 15 km to the northwest of the Project, with a population of 103 people (ABS, 2021a).

FIGURE 3.1
Project Regional Context



- Legend**
- Study Area
 - Road
 - Watercourse
 - Nature Reserve
 - National Park
 - State Forest



0 5 10
Kilometres

Scale 1:300,000 at A4
GDA2020 MGA Zone 50

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3.2 Flora and Vegetation

Flora and vegetation surveys to support Project design and approvals were undertaken across a Survey Area of 15,835 ha. These surveys recorded a total of 248 discrete flora taxa within the Survey Area. Introduced flora comprised 18.1% of the total number of flora taxa recorded (45 species in total) which is representative of the high levels of human impact evident throughout the Survey Area.

Although most introduced taxa identified within the Survey Area were common pasture weeds, one species (*Zanthedeschia aethiopica*) is listed as Weeds of National Significance (WoNS) (Invasive Plants and Animals Committee (IPAC), 2017) and Declared Pests under the *Biosecurity and Agriculture Management Act (2007)* (WA BAM Act).

A total of five significant flora taxa were recorded within the Survey Area during the 2024 field survey, including one Threatened taxon listed under the BC and EPBC Acts (*Grevillea curviloba*):

- *grevillea curviloba* (found to be planted outside of its natural range)
- *calytix ecalycata* subsp. *brevis*
- *eucalyptus macrocarpa* subsp. *elachantha*
- *haemodorum loratum*
- *poranthera moorokatta*.

A total of eight Vegetation Types (VTs) were identified in the Survey Area and accounted for approximately 5% of the Survey Area. The remaining 95% of the Survey Area has been mapped as highly modified areas with approximately 90% of the Survey Area comprising of cleared agricultural land.

3.3 Fauna

Fauna surveys to support Project design and approvals were undertaken across a Survey Area of 17,213 ha. A total of 12 broad fauna habitat types were identified in the Survey Area, with 'Cleared' being the most dominant habitat type.

Nine listed bird species under the EPBC Act and/or BC Act were recorded during the BBUS and fauna surveys. These comprised of the Carnaby's black-cockatoo (EN), the Blue-billed duck (P4), Peregrine Falcon (OS) and six migratory shorebirds. No non-bird listed terrestrial vertebrate fauna were recorded during the field surveys,

Black-cockatoo foraging habitat and potential breeding habitat is present within the Project Site in addition to wetlands that provide temporary habitat to migratory shorebirds.

3.4 Surface Water

There are three significant streams intersecting the Project Area. Caren Caren Brook intersects the southwestern boundary of the Project Area. An unnamed significant stream intersects a small portion of the Project Area, and it connects to Yathroo Brook, which intersects the northern boundary of the Project Area.

Guraga Lake, which is listed on the Directory of Important Wetlands (DBCA-045) (DBCA, 2018), is located approximately 1.4 km west of the Project Area. This is noted as one of the more important wetlands for waterbirds in the southwest of WA, as it “supports diverse and abundant bird life and is an important drought refuge area for waterbirds” (Department of Environmental Conservation, 2008). There are no Ramsar sites located within the Project Area.

3.5 Groundwater

The entire Project Area is located within the Gingin Proclaimed Groundwater Area under the RIWI Act. There are numerous potential terrestrial and aquatic Groundwater Dependant Ecosystems (GDEs) occur within the Project Area, with a majority of them associated with the native vegetation within the Project Area. Although there are numerous potential GDEs, they cover a relatively small part of the Project Area.

Areas of the Project site West of the Brand Highway are located within Special Control Area 1 – Bassendean Sands (SCA1). The purpose of SCA1 is to preserve and enhance the ecological values of the Bassendean Sands and interrelated wetlands, and to ensure protection of the Shire’s public drinking water sources.

3.6 Soils

Soil landscape mapping of WA has been compiled from the results of various surveys across WA by DPIRD and maps 32 separate soil-landscape units across the Survey Area (DPIRD, 2025). The most commonly occurring soil-landscape units are the Dandaragan 3 Subsystem (27.0%), the Dandaragan 2 yellow Phase (16.1%), and the Rows 3 pale Phase (10.2%).

3.7 Heritage

A desktop review for Aboriginal cultural heritage and historical heritage places within or in proximity to the Project Area was undertaken in 2024 by Umwelt.

The desktop assessment using the Aboriginal Cultural Heritage Information System (ACHIS) identified that there are two registered Aboriginal cultural heritage sites (Artefacts/ Scatter) within the Project Area. Six previous surveys undertaken by others have identified Aboriginal cultural heritage sites within and in proximity to the Project Area. These sites included artefact scatters/ isolated artefacts, scar trees, ethnographic sites including mythological, ceremony and songline sites, water sources and historic sites, and were generally located within vicinity to waterways. Given that some areas of the Project Site are undisturbed (waterways and some sections of remnant vegetation), there is a high potential for discovery of the above site types within and adjacent to waterways and remnant vegetation. Neoen will continue to engage under its Yued Heritage Protection agreement for relevant activity engagement as mutually agreed upon between Neoen and the Yued Aboriginal Council.

There is one registered historical heritage site within the Project Area boundary - Yathroo Homestead and Outbuildings. There are two registered historical heritage sites outside the boundary, but within proximity to the Project Area. Desktop review of the Project Area including aerial assessment identified a number of potential historical heritage sites. These sites are predominantly farmhouse structures, which have the potential to be associated with historical sites and features including stock

routes, sheds, huts, cattle yards and surface artefact scatters. Further there is potential for dump sites associated with discard from domestic, agricultural, and / or pastoral activities, former homesteads, houses and other ancillary buildings, and early road alignment markers and abandoned or discarded farming equipment.

A Chance Finds Procedure and Aboriginal heritage site induction will be developed for the Project in partnership with the Yued Aboriginal Council and Traditional Owners and Neoen will continue to engage Traditional Owners throughout the Project lifecycle.

4.0 Preliminary Construction Methodology

The chosen Engineering, Procurement and Construction (EPC) contractor will be responsible for the detailed construction methodology for the Project. The following sections describe a typical construction methodology for a wind farm Project.

4.1 Project Delivery Timeframes

The construction period for the Project will be agreed between the EPC contractor and Neoen and will be subject to change depending on weather conditions, availability of materials, and construction speeds. The construction timeframe is estimated to be 33 months. Subject to Project approvals, construction is expected to commence in 2026 and conclude in 2029. Commissioning of the Project is scheduled to start in 2029.

During the construction phase, works will typically occur for six days each week (Monday to Saturday), and up to 12 hours per day (06:30 to 18:30). During certain construction activities, such as foundation pours and turbine lifts, works may be required to run longer than 12 hours for safety and quality purposes. It may also be necessary for construction activities to take place on a Sunday or during the nighttime. In such instances, appropriate mitigation and management measures will be incorporated into the Contractor CEMP. These assumptions will be revisited and modified as necessary at a later stage.

Some early works will be required between approval of the Project and commencement of construction. This will include:

- Detailed site investigations for the purposes of micro-siting the turbines.
- Site establishment (temporary site facilities, lay down areas, equipment and materials).
- Road improvement works.

For the construction of the Project, the following activities are expected to occur:

- Site establishment (temporary site facilities, lay down areas, equipment and materials).
- Earthworks for access roads and wind turbine hardstands.
- Excavation for the foundations.
- Construction of wind turbine foundations (bolt cage, reinforcement and concrete).
- Construction of BESS, substation and ancillary infrastructure.
- Installation of electrical and communications cabling and equipment (including overhead feeders from cable marshalling points to the substation).
- Installation of wind turbine transformers, in parallel with electrical reticulation works.
- Installation of towers for the wind turbines, and delivery of the wind turbine components to the Project site.

- Erection of wind turbines, using high-level mobile cranes.
- Installation of overhead powerline and associated towers/poles.
- Commissioning of wind turbines, followed by reliability testing.

The activities listed above will predominately occur in the order listed, however some of these activities may be carried out concurrently to minimise the overall length of the construction programme.

4.2 Equipment and Machinery

The major equipment and machinery that is likely to be used for each component of construction of the Project includes:

- For site mobilisation: track loader, grader, backhoe, trucks, small crane and generators.
- For access roads and hardstands: track loaders, excavators, graders, trucks (with trailer), water carts and rollers.
- For wind turbines: excavators, rock breaker, concrete trucks, trucks (with trailer and vacuum), larger crawlers cranes, medium crawler cranes, small crawler cranes and generators.
- For electrical reticulation works: trencher, backhoe, excavator, grader, tractor and small terrain crane.

Other equipment and machinery may be required, depending on the construction techniques nominated in the detailed design phase.

It is expected that one of each turbine component type will be delivered in a single day during the haulage operation (i.e. one blade, one tower section, nacelle, cooling tower, and turbine hub). Each individual component will be carried on a single oversize overmass (OSOM) vehicle.

4.3 Construction Workforce

The Project is expected to generate multiple employment opportunities. However, it is estimated that the maximum (peak) workforce will comprise of up to 450 staff, throughout the 33 months construction period, with 15 permanent staff to be employed during operations.

It is expected that some of the workforce will commute from the wider local areas such as Moora, Dandaragan and Cataby, and will not require additional accommodation. Neoen is working with the Shire of Dandaragan on the accommodation options including temporary and permanent accommodation, The Project is not expected to construct permanent or temporary accommodation within the Project boundary.

4.4 Construction Water Supply

The provision of water is essential for the construction of the Project. The construction activities likely to require water are:

- bulk earthworks and material conditioning
- stripping
- dust suppression
- concrete batching.

High level estimates of the water volumes that would be required over the construction period are in the range of 500 – 700 megalitres.

Water for construction is likely to be sourced from an existing onsite bore.

5.0 Environmental Management Framework

5.1 Environmental Policy

Neoen have a Health, Safety and Environment (HS&E) Policy (**Appendix A**) in place to provide a healthy and safe working environment for its employees, guarantee the integrity of the company's assets and protect the environment. Through this policy, Neoen is committed to:

- Meeting or exceeding all applicable Health, Safety & Environmental laws or regulations.
- Pursuing the objective of no harm to people, the company's assets and no damage to the environment or the local communities.
- Minimising adverse impacts to the environment and the ecosystem, optimising the social impact to the communities in the surrounding of Neoen's facilities, and preserving the local cultural heritage.
- Taking actions to prevent pollution and promoting the sustainability of the natural resources that are used.
- Managing the HS&E matters as any other critical business activity in the company, with a continuous performance improvement mindset.
- Providing guidance, support and training to Neoen personnel and contractors in order to create and maintain a best-in-class HS&E culture.

5.2 Environmental Risk Register

An Environmental Risk Register will be developed for the Project. Contractors will be required to develop their own environmental risk register specific to their scope using the Project Environmental Risk Register as a guide.

5.3 Approvals and Permits

Table 5.1 provides a list of environmental licences, approvals or permits that may be required for the Project.

Table 5.1 will operate as a live register and be updated as and when required.

Table 5.1 Regulatory Approvals Obtained for the Project

Legislative Framework	Reference/Instrument No.	Duration	Conditions or Commitments
Primary Project Approval			
Development Approval			
EP Act Referral			
EPBC Act Referral			
Site Access and Roads			
Main Roads WA approval to work within a Road Reserve			
Watercorp approval to work within the prescribed distance of Watercorp assets			
Aboriginal Heritage			
Vegetation			
Native Vegetation Clearing Permit			
Hydrology			
Bed & Banks Permit			
26D licence to install groundwater well			
5C licence to abstract groundwater			
5C licence to abstract surface water			

5.4 Environmental Objectives and Targets

Environmental objectives and targets have been developed for the Project. These are included in each of the environmental management tables presented in **Section 6.0**.

5.5 Audits and Inspections

Environmental inspections will be regularly conducted on site against the requirements of the CEMP. Inspections will include daily site environmental inspections by Supervisors and weekly site environmental inspections by the Senior Environmental Advisor (or delegate).

Audits will also be undertaken on a regular basis to ensure the Project is being constructed and operated in accordance with legal and CEMP requirements. The following audits will be undertaken as a minimum throughout the Project:

- Mobilisation audits (to be undertaken within one month of Contractor mobilisation) to ensure the Contractors site has been established and work is being undertaken in accordance with this CEMP and other legal requirements.
- Quarterly audits of the Contractors site, works and systems to ensure compliance with this CEMP and legal requirements.
- Annual legal compliance audits (where required).
- Demobilisation audits of Contractors site and systems.

An audit and inspection schedule will be developed by the Senior Environmental Advisor prior to construction commencing. This will be reviewed and updated on a quarterly basis in response to new legal requirements and findings of previous audits.

Contractors will be required to develop their own audit and inspection schedule which will need to be reviewed and approved by Neoen prior to mobilising to site.

5.6 Incident Response

5.6.1 Incident Management

An environmental incident is an event with the potential to result in damage to the environment, a cultural heritage value/site, a non-compliance against a regulatory requirement or disruption to the community leading to a community concern.

In the event of an incident, management actions will be implemented immediately where safe to do so. Examples of management actions include:

- cleaning up a hydrocarbon spill
- stopping work and barricading off an area where a potential heritage site has been identified
- ceasing works where clearing has gone outside a clearing boundary.

Once appropriate management actions have been implemented, the incident will be reported as outlined in **Section 5.6.2**.

5.6.2 Incident Reporting

All site personnel and contractors are responsible for reporting environmental incidents to the Senior Environmental Advisor.

The Senior Environmental Advisor must be verbally notified about the incident within four hours of the event. A written account of the event must be provided to the Senior Environmental Advisor within 24 hours of the event.

For all incidents, the Senior Environmental Advisor will verbally inform the Construction Manager, Safety Manager and Project Manager as soon as practicable. For significant environmental incidents (e.g., unauthorised clearing of a tree, hydrocarbon spill in excess of 20 L), or where required legally, the Senior Environmental Advisor will notify the relevant regulatory authorities.

Project personnel and contractors must not notify any regulatory agencies of incidents without prior approval from Neoen.

5.6.3 Incident Investigation

All incidents must be investigated, and a report detailing the incident event must be submitted in writing to the Senior Environmental Advisor, and must include the following details:

- incident event
- timeline of events that led to the incident
- causes or contributing factors to the incident
- controls that would have prevented the incident from occurring
- corrective and preventative actions to avoid recurrence.

5.7 Emergency Response

A Project emergency management plan will be developed to address management responses to potential environmental emergencies, as well as health and safety emergencies. The plan will include but not be limited to:

- potential environmental emergencies
- actions and associated procedures required to mitigate the environmental impact from emergencies
- emergency response training and competencies
- appropriate emergency response equipment
- communication procedures
- notification / emergency contact details.

Contractors are to assess potential environmental emergencies applicable to their scope of works and ensure plans, procedures, training and equipment are developed to mitigate the risks in accordance with the requirements of this CEMP.

5.8 Organisational Roles and Responsibilities

Key roles and environmental responsibilities for the Project are presented in **Table 5.2** below. Note that these roles may be adjusted based on the specific management structure of the construction contractors and site operators.

Table 5.2 Roles and Responsibilities

Role	Key Responsibilities
Project Director – Contractor	• Provide leadership to the Project Manager and the broader Project team in relation to environmental management on site. • Managing environmental risks to avoid environmental harm and reputational damage. • Liaise with stakeholders and Project managers to report on Project status in relation to environmental management.
Project Manager – Contractor	• Provide leadership regarding environmental management on site. • Ensure sufficient personnel, equipment and other resources to achieve Project environmental objectives and targets. • Review and approve the CEMP and key Project environmental documents.
Construction Manager – Contractor	• Oversee and direct construction Projects from conception to completion. • Work with the Senior Environmental Advisor and provide leadership regarding environmental management on site. • Ensure resources are available on site to implement the CEMP, and complete required reporting.
Senior Environmental Advisor – Contractor	• Assist the Construction Manager to ensure the CEMP requirements are met in all construction activities. • Acquire Project approvals, permits and licences as required. • Undertake audits/inspections according to the audit schedule to ensure compliance with the CEMP, legal requirements and/or Project-specific objectives and/or targets. • Provide environmental inductions / training to all contractors or employees. • Ensure required environmental monitoring is undertaken according to monitoring schedule. • Investigate and report environmental incidents as required (if any).
Construction Supervisors – Contractor	• Ensure construction works are carried out in accordance with this CEMP and relevant environmental procedures. • Assist Construction Manager and Senior Environmental Advisor to implement this CEMP on site. • Ensure all employees and contractors have appropriate training and adequate understanding of the environmental requirements associated with their work activities.
Sub-Contractors	• Appoint suitably qualified and experienced contractors to carry out construction / environmental works within their scope of work. • Maintain sufficient resources to manage site environmental issues.

Role	Key Responsibilities
	Report information as required by the Construction / Senior Environmental Advisor and Neoen.
All Personnel	- Conduct works in compliance with this CEMP. - Follow directions given by the Construction Manager and/or Senior Environmental Advisor with regard to onsite environmental management.

5.9 Environmental Training and Awareness

Environmental inductions, trainings and meetings will be delivered throughout the Project to ensure the relevant aspects of this CEMP are communicated to the Project team including contractors and sub-contractors, and to ensure all parties understand their environmental management obligations. The following will be undertaken during the Project:

- **Project Environmental Induction:** All personnel involved in the Project will be required to attend a Project environmental induction prior to undertaking any works on site. The induction will include environmental and land access.
- **Project Heritage Induction:** All personnel involved in the Project will be required to attend a Project heritage induction prior to undertaking any works on site. The induction will be discussed and aligned with the Yued Aboriginal Council.
- **Land Clearing Training:** All personnel involved in the clearing of native vegetation will be required to attend a training package that lists all mitigation measures to be implemented prior to and during clearing activities. The training package will also include information of reporting of land clearing activities.
- **Daily Pre-Start Meetings:** These will be undertaken on a daily basis on site prior to commencing the daily activities. They will include an environmental component whereby any activities planned for the day that have potential environmental impacts will be discussed and management measures agreed upon.
- **Monthly Environmental Toolbox Talks:** These will be undertaken on site once a month and will be facilitated by the site supervisor or nominated representative. Topics will vary each month and will be relevant to the Project. Examples include, waste management, awareness of heritage sites, weed prevention.
- **Contractor Kick-off Meetings:** The agenda for Contractor kick-off meetings will include an environmental component. Items to be discussed, include, but are not limited to:
 - key environmental factors applicable to the Project
 - contents of the CEMP
 - contractor CEMP requirements
 - environmental management expectations
 - monitoring and reporting requirements
 - audits and inspections.

5.10 Contractor Management

Following Contract award, the main Contractor(s) will be required to:

- Have appropriately qualified personnel in place to manage the environmental impacts relevant to their scope.
- Have a Project-specific CEMP approved by Neoen prior to mobilisation to site specifically for their scope of works. Contractor CEMPs are to conform with the requirements of this CEMP and any legal requirements that apply to the Project.
- Attend pre-mobilisation meeting(s) and facilitate a Risk Assessment Workshop addressing environmental risks associated with their scope.
- Ensure any design components of their scope, consider CEMP and relevant legal requirements.
- Co-operate and participate as required with Project audits and inspections. Contractors are also to develop and implement their own audit schedule to the satisfaction of Neoen.

5.11 CEMP Review

A review of the implementation and effectiveness of this CEMP will be undertaken annually should construction extend for more than 12 months, and at the transition of construction to operations. This will include a review of:

- This CEMP and supporting documents / registers.
- Applicable environmental policies.
- Performance against objectives and targets.
- Compliance with legal requirements.
- Environmental incidents.
- Corrective actions.
- Recommendation for improvement.
- The management review will be facilitated by the Senior Environmental Advisor and conducted through a meeting or workshop and will include the following personnel at a minimum:
 - Senior Environmental Advisor.
 - Project Manager.
 - Construction Manager.
 - Project environmental personnel.
 - Meeting minutes will be taken and any corrective actions arising during the review will be captured in a corresponding register. Any updates to the CEMP will be communicated to relevant stakeholders.

6.0 Environmental Management Tables

This section of the CEMP comprises of a number of environmental management tables for the environmental factors relevant to the Project. Each table lists the management controls to be implemented during the Project, from the design stage through to rehabilitation. These tables will guide the Contractors on the environmental management measures they will need to align with in their CEMPs. The management measures will be reviewed and updated throughout the life of the Project to account for such items as scope changes, approval conditions, construction and operational impacts.

Environmental tables have been developed for the following:

- Surface Water Management (**Section 6.1**).
- Vegetation Clearing and Ground Disturbance (**Section 6.2**).
- Flora and Fauna Management (**Section 6.3**).
- Weed and Pest Management (**Section 6.4**).
- Aboriginal Heritage Management (**Section 6.5**).
- Air Quality and Dust Management (**Section 6.6**).
- Noise and Vibration Management (**Section 6.7**).
- Waste Management (**Section 6.8**).
- Hydrocarbon and Chemical Management (**Section 6.9**).
- Fire Management (**Section 6.10**).
- Demobilisation and Rehabilitation (**Section 6.11**).

Each environmental table details the objectives, targets, management actions and monitoring requirements for each environmental factor. Management actions may be updated when additional background information becomes available or further actions are necessary for a particular environmental factor.

6.1 Surface Water Management

Table 6.1 Surface Water Management

Surface Water Management			
Reference Documents	• RIWI Act. • Shire of Dandaragan Local Planning Scheme No. 7. • Stormwater Management Manual for Western Australia(Department of Water and Environmental Regulation (DWER), 2025). • Department of Water and Environmental Regulation’s Decision Process for Stormwater Management in WA (DWER, 2017).		
Objectives	• Maintain hydrological regime of surface water bodies. • Maintain existing water quality of surface water bodies.		
Targets	• No direct impacts to riparian vegetation outside of approved clearing areas. • No discharge of pollutants or other materials into surrounding wetlands, waterways or their tributaries (see Section 3.4).		
Management Actions			
Phase	Required Action	Responsibility	Timing
Design	Major Project infrastructure will be located outside of 1% AEP flood areas.	Contractor	Design and planning
Design	Surface water management will be designed to separate clean stormwater from areas with potential sources of pollutants.	Contractor	Design and planning
Design	The number of new creek crossings will be minimised as far as practicable, and existing creek crossings used where possible.	Contractor	Design and planning
Design	Post-development flood modelling will be undertaken as part of the design process to verify that appropriate design features and mitigations will achieve the surface water management objectives.	Contractor	Design and planning
Design and Construction	Surface water and drainage management infrastructure will be designed and constructed with reference to the Stormwater Management Manual for Western Australia(DWER, 2017).	Contractor	Ongoing
Construction	Sediment laden surface water will be diverted to sedimentation ponds. Typical erosion and sediment control measures such as silt fences, diversion bunds, rock check dams and construction entry/exit pads will divert rainfall runoff into the sediment basin to enable the settlement of suspended solids.	Contractor	Construction
Construction	A bed and banks permit will be obtained for creek crossings and any other works proposed within the bed and banks of creeks. Works will be undertaken in accordance with commitments and conditions of the bed and banks permits issued.	Contractor	Ongoing

Construction	Excess material generated from construction activities will be temporarily stockpiled in a location where it will not be impacted by any flood waters.	Contractor	Ongoing
Construction	Dewatering will be minimised and any discharge managed so that it does not adversely impacts the water quality of nearby surface water bodies.	Contractor	Construction
Construction	There will be no physical damage or alteration to riparian zone vegetation outside of approved clearing areas.	Contractor	Construction
Construction and operations	There will be no abstraction of surface water or groundwater unless approvals required under the RIWI Act are in place. No groundwater will be abstracted from the Special Control Area 1 – Bassendean Sands (SCA1), as identified in the Shire of Dandaragan Local Planning Scheme No. 7.	Contractor / Neoen	Ongoing
Construction and operations	No introduction of weeds or pests into riparian zone during construction of the Project or as part of ongoing operations of the Project.	Contractor	Ongoing
Operations	Stormwater management infrastructure will be maintained to ensure there is no restrictions to flow, in particular prior to any forecast heavy rainfall events.	Contractor / Neoen	Ongoing
Operations	Stormwater retention basins will be maintained to ensure there is sufficient capacity available to mitigate risk of contaminants flowing to adjacent watercourses.	Contractor / Neoen	Ongoing
Operations	In the event of a fire at the BESS, the firewater generated will be captured in a lined pond, and tested to ensure it is not contaminated prior to release	Contractor / Neoen	Ongoing
Operations	Wastewater treatment plant effluent will be treated and discharged in accordance with any issued permits.	Contractor / Neoen	Ongoing

Monitoring and Inspection Requirements

Activity	Required Action	Responsibility	Frequency
Inspection	Surface water management features will be inspected and maintained to ensure effective ongoing stormwater management.	Contractor / Neoen	- Monthly. - One day prior to forecast heavy rainfall events. - Within one week following heavy rainfall events.

6.2 Vegetation Clearing and Ground Disturbance

Table 6.2 Vegetation Clearing and Ground Disturbance

Vegetation Clearing and Ground Disturbance Management				
Reference Documents	• <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) (EPBC Act). • <i>Environmental Protection Act (1986)</i>. • <i>Biodiversity Conservation Act 2016</i> (WA) (BC Act). • Referral Guidelines for 3 Threatened Black-Cockatoo Species: Carnaby's Cockatoo, Baudin's Cockatoo & Forest Red-tailed Black-Cockatoo (Department of Agriculture, Water and the Environment, 2022).			
Objectives	• Remnant native vegetation clearing does not exceed 15 ha or that specified in environmental approvals. • Planted native vegetation clearing does not exceed 8 ha or that specified in environmental approvals. • Isolated remnant tree clearing does not exceed 5 ha or that specified in environmental approvals. • Minimise the total area of clearing and/or land disturbance and avoid unnecessary clearing. • Minimise the bisecting of existing patches of native vegetation.			
Targets	• No incidents of clearing outside of approved clearing footprints. • No clearing of Rank 1 and Rank 2 Black-Cockatoo habitat trees. • No conservation listed flora or fauna are impacted by land clearing. • All topsoil removed is stockpiled and kept available for use during rehabilitation.			
Management Actions				
Phase	Required Action	Responsibility	Timing	
Pre-clearing	Personnel involved in native vegetation clearing activities will be required to undertake internal Project specific land clearing training which will outline regulatory requirements and management actions or controls to be implemented.	Contractor	Prior to mobilisation	
Pre-clearing	Design will ensure that clearing of native vegetation is minimised as far as practicable and where native vegetation is required to be cleared it is within the approved areas as nominated by environmental referrals and approvals.	Contractor	Ongoing	
Pre-clearing	Approved native vegetation clearing area boundaries will be demarcated prior to clearing.	Contractor	Prior to clearing activities	

Pre-clearing	Known Rank 1 and Rank 2 black cockatoo nesting trees within 50 m of clearing boundaries will be clearly tagged as “No-go zone” prior to clearing.	Contractor	Prior to clearing activities
Pre-clearing	Micro-siting of infrastructure will be undertaken to further minimise native vegetation clearing where possible.	Contractor	Prior to clearing activities
Pre-clearing	The number of creek crossings will be minimised as part of detailed design, and where crossings are necessary, existing crossings will be utilised where practicable to reduce the clearing of riparian vegetation.	Contractor	Prior to clearing activities
Clearing	Areas planned for native vegetation clearing will be inspected for native fauna immediately prior to undertaking land clearing by a suitably qualified fauna spotter. Where conservation listed fauna are encountered, these will be reported to the Senior Environmental Advisor immediately.	Contractor	Ongoing
Clearing	The maximum area of native vegetation permitted to be cleared will not exceed 15 ha of remnant native vegetation, 8 ha of planted native vegetation, 5 ha of isolated remnant trees, or that specified in environmental approvals.	Contractor	Ongoing
Clearing	There will be no clearing of PEC/TEC vegetation, unless approval has been granted by the relevant agencies.	Contractor	Ongoing
Clearing	No ground disturbance works will be undertaken within 50m of mapped wetland boundaries within the SCA1.	Contractor	Ongoing
Clearing	No native vegetation directly associated with the wetlands West of Brand Highway will be cleared.	Contractor	Ongoing
Clearing	All ground disturbance and vegetation clearing will be undertaken in accordance with the Project’s land disturbance procedure.	Contractor	Ongoing
Clearing	Fauna spotters will be present during all native vegetation clearing and clearing of trees to ensure that no trees being removed are housing listed species, chicks, or eggs, and that no conservation significant fauna species are present.	Contractor	Ongoing
Clearing	No Rank 1 (trees with activity at hollow observed) and Rank 2 (trees with hollows of suitable size with chew marks visible) are permitted to be removed.	Contractor	Ongoing
Clearing	Where trees are authorised to be cleared, they will be felled away from areas of retained native vegetation as safe and practicable. Where trees unavoidably fall into retained areas, they will be left in-situ.	Contractor	Ongoing
Clearing	Vegetation clearing will be undertaken progressively and in stages so that only a small subset of the Project footprint is impacted at any one time.	Contractor	Ongoing

Clearing	Where habitat features such as existing hollow logs cannot be retained in-situ during land clearing, they will be relocated to adjacent areas of suitable habitat if safe and practicable.	Contractor	Ongoing
Clearing	All controls contained in Table 6.4 regarding the management of weeds and plant pathogens will be adhered to at all times by the relevant personnel.	Contractor	Ongoing
Clearing	Topsoil stockpiles will include signage that identifies the source of the stockpile, the date it was stockpiled and the volume of the stockpile.	Contractor	Ongoing
Construction	Topsoil stockpiles will be protected with cleared scrub, vegetation or otherwise treated as required to minimise wind erosion.	Contractor	Ongoing
Post-Clearing	Following the completion of each clearing event, the location and extent of area cleared will be recorded via GPS / survey and reported within a centralised dataset.	Contractor	Monthly
Monitoring and Inspection Requirements			
Activity	Required Action	Responsibility	Frequency
Inspection	Active clearing fronts will be inspected to verify that they are and remain within approved boundaries.	Contractor	Daily
Inspection	Topsoil stockpiles will be inspected for evidence of erosion.	Contractor	Monthly
Monitoring	Total area cleared and the location of clearing completed will be recorded within a centralised dataset and reviewed on a regular basis to ensure there is no exceedance of the permitted area to be cleared.	Contractor	Monthly
Inspection	Areas planned for clearing will be inspected for native fauna prior to undertaking land clearing.	Contractor	As required

6.3 Flora and Fauna Management

Table 6.3 Flora and Fauna Management

Flora and Fauna Management	
Reference Documents	• EPBC Act. • EP Act. • BC Act. • Referral Guidelines for 3 Threatened Black-Cockatoo Species: Carnaby's Cockatoo, Baudin's Cockatoo & Forest Red-tailed Black-Cockatoo(Department of Agriculture, Water and the Environment, 2022).
Objectives	• No direct impacts to listed vertebrate fauna or listed flora taxa.

	• Ensure the total area of listed species habitat clearing does not exceed that specified in environmental approvals. • Minimise indirect impacts to native fauna.
Targets	• No incidents of unauthorised clearing (particularly conservation listed fauna habitats identified for retention). • No clearing of Rank 1 and Rank 2 black cockatoo nesting trees. • No incidents of trapped or injured native fauna as a result of Project activities. • Retain microhabitats such as fallen logs in-situ wherever possible. • Undertake land clearing in a manner that allows fauna to migrate into adjacent areas and retains landscape connectivity.

Management Actions

Phase	Required Action	Responsibility	Timing
Pre-clearing	All site personnel will undertake an environmental and heritage induction which will provide training on the relevant fauna and flora species which may be impacted during construction and how to meet their responsibility to minimise the risk.	Contractor	Mobilisation
Pre-clearing	An inspection of all potential black cockatoos breeding trees will be undertaken within the clearing footprint.	Contractor	Within 24 hours of clearing
Pre-clearing	No Rank 1 (trees with activity at hollow observed) and Rank 2 (trees with hollows of suitable size with chew marks visible) black cockatoo breeding trees will be removed, and these trees will have a no-go zone established around their perimeter if located within 50m of a clearing boundary.	Contractor	Ongoing
Pre-clearing	Where it is discovered that a Rank 3 tree has been used or is in active use for nesting by black-cockatoos, a no-go zone will be established around the tree and the tree will not be cleared until the chick has naturally fledged and the breeding pair vacated.	Contractor	Ongoing
Pre-clearing	Habitat trees within the clearing footprint that can be safely retained will be marked with flagging tape and avoided.	Contractor	Ongoing
Pre-clearing	Preclearance searches of habitat will be undertaken prior to clearing by a qualified fauna spotter, with habitat features/trees clearly identified and searched for fauna.	Contractor	Ongoing
Pre-clearing	Where listed species are found during pre-clearance surveys, a no-go zone will be established and the area avoided until the individuals have naturally dispersed.	Contractor	Ongoing
Clearing	Clearing of trees will be as per the mitigation measures outlined in Table 6.2 .	Contractor	Prior to clearing
Construction	On-site fencing will be installed in a way that allows the free movement of listed species across the site (i.e., no barbed wire and sufficient spacing etc.) with the exception of fencing surrounding the BESS compound.	Contractor	Ongoing

Construction	Signposted speed limits will be implemented and adhered to at all times. Any fauna strikes will be immediately reported to the Senior Environmental Advisor.	Contractor	Ongoing
Construction	Clearing will be undertaken in a slow, progressive manner towards adjacent native vegetation to allow fauna to move into adjacent native vegetation ahead of the clearing activity.	Contractor	Ongoing
Construction	Construction and operation personnel will be educated on the potential presence for fauna, in particular black cockatoos and other listed species identified as having the potential to occur in the area.	Contractor	Ongoing
Construction	Where native fauna is encountered, all site personnel and contractors shall keep sufficient distance to not disturb them and will not cause harm or attempt to trap them. Where injured fauna is encountered, the Wildcare Helpline (08 9474 9055) will be immediately contacted, and the Work Area Supervisor notified.	Contractor	Ongoing
Construction	Where any listed fauna species are encountered during construction, any activities in proximity (<10 m) to their location will cease until they are no longer present. Handling of such fauna is not permitted unless a Section 40 approval has been granted from the Department of Biodiversity, Conservation and Attractions.	Contractor	Ongoing
Construction	All open water sources (e.g. sediment basins) will be designed to limit access from fauna and pests while allowing safe egress for trapped native fauna. Where trapped fauna is encountered, the Wildcare Helpline (08 9474 9055) will be contacted in the instance that the fauna cannot be confidently and safely rescued.	Contractor	Ongoing
Construction	Any excavations or trenching that is left open overnight will have ramping installed to allow egress for trapped fauna or will otherwise be secured so that fauna cannot become trapped.	Contractor	Ongoing
Construction	On-site waste will be managed in accordance with Table 6.8 to minimise attraction of fauna and ensure safe storage and disposal.	Contractor	Ongoing
Construction	Where livestock are encountered onsite during construction, the landowner will be immediately contacted to safely remove the animal/s.	Contractor	Ongoing
Monitoring and Inspection Requirements			
Activity	Required Action	Responsibility	Frequency
Inspection	Any open trenches will be inspected at the start and end of each working day.	Contractor	Daily as required
Inspection	Areas planned for clearing will be inspected for native fauna prior to undertaking land clearing.	Contractor	As required

6.4 Weed and Pest Management

Table 6.4 Weed and Pest Management

Weed and Pest Management				
Reference Documents	• <i>Biosecurity and Agriculture Management Act 2007</i> (WA) (BAM Act). • <i>Biosecurity and Agriculture Management Regulations 2013</i> (WA). • <i>Phytophthora Dieback Management Manual</i> (DBCA, 2020). • Relevant Declared Pest Information Sheets:			
Objectives	• No introduction of new Weeds of National Significance and no spread of existing Weeds of National Significance as a result of Project activities. • No plant pathogens or diseases such as dieback (<i>Phytophthora cinnamomi</i>) will be spread into or become established within the Project site as a result of Project activities.			
Targets	• All ground disturbing plant and equipment are subject to a weed and seed inspection upon arrival to site and are certified as weed free upon entry to site. • No introductions of new weed species. • No spread of existing weed species on site. • No introduction of dieback on site.			
Management Actions				
Phase	Required Action	Responsibility	Timing	
Pre-clearing	The Project site induction and land clearing training will highlight the importance of weed and pest management.	Contractor	Ongoing	
Pre-clearing construction & operations	A Weed Management Procedure will be developed and implemented during construction, operations, and closure activities.	Contractor	Ongoing	
Construction	All ground disturbing plant and equipment will enter site clean and free of weeds or dieback.	Contractor	Ongoing	
Construction	Upon arrival to site, ground disturbing plant and equipment will be subject to a weed and seed inspection prior to entry. A certificate will be issued if the plant / equipment is deemed to be weed and seed free and a copy will be kept with the plant / equipment at all times.	Contractor	Ongoing	
Construction	Where plant and equipment does not pass the weed and seed inspection, the plant / equipment shall be further cleaned at a dedicated wash down area and re-inspected.	Contractor	Ongoing	

Construction	Weed infested areas that are identified will be avoided where practicable.	Contractor	Ongoing
Construction	Prior to leaving weed infested areas, the plant and equipment will be brushed down.	Contractor	Ongoing
Construction	Any fill brought to site will be accompanied with a clean fill certificate. Where practicable, the fill should be from a quarry (i.e. not reused from another site) that has a Dieback Management Plan in place.	Contractor	Ongoing
Construction	Waste will be appropriately stored and managed to prevent pest fauna from accessing putrescible waste. Refer Table 6.8 for additional waste management measures.	Contractor	Ongoing

Monitoring and Inspection Requirements

Activity	Required Action	Responsibility	Frequency
Monitoring	Undertake weed monitoring and inspections as per the Project Weed Management Procedure.	Contractor	Ongoing

6.5 Aboriginal Heritage Management

Table 6.5 Aboriginal Heritage Management

Aboriginal Heritage Management	
Reference Documents	• <i>Aboriginal Heritage Act 1972 (WA).</i> • <i>Aboriginal Heritage Regulations 1974 (WA).</i> • <i>Aboriginal Heritage Due Diligence Guidelines 2013 (WA).</i>
Objectives	• No unauthorised impacts or disturbance of known Aboriginal Heritage Sites. • All areas mapped as high ACH potential within the proposed disturbance footprint have been heritage surveyed in advance.
Targets	• No direct impacts to known Aboriginal Cultural or Historical Heritage Sites. • Any potential Aboriginal cultural heritage material finds are managed in accordance with the Archaeological Chance Finds Procedure. • Traditional Owner Representatives will be consulted with throughout all phases of Project design and development. • All personnel involved in the Project will be required to attend a Project induction that includes an Aboriginal heritage component.

Management Actions

Phase	Required Action	Responsibility	Timing
All	All personnel involved in the Project will attend a Project environmental and heritage induction prior to undertaking any works on site. The induction will ensure all personnel involved in the Project understand their legal obligations, the significance of Aboriginal cultural heritage, and the procedure to follow in the event of an unforeseen discovery of archaeological material. The induction will also serve to ensure Project personnel understand and are empowered to proceed with work in a culturally respectful manner.	Contractor	Ongoing
Design	Project design will minimise disturbance of areas mapped as having a greater ACH potential.	Contractor / Neoen	Ongoing
Pre-clearing	An Aboriginal cultural heritage survey is to be undertaken in consultation with the Yued Traditional Owner group prior to Project ground disturbance.	Contractor / Neoen	Ongoing
Construction	Traditional Owners will be consulted throughout all phases of Project design and development to provide information on Project developments and to actively seek input from Traditional Owners. This should include providing updates to Traditional Owners of any major design changes as soon as practicable.	Contractor / Neoen	Ongoing
Construction	Where works are proposed within 100 m of a registered Aboriginal heritage site, the boundaries of the site will be illustrated on site drawings and clearly communicated to personnel.	Contractor	Ongoing
Construction	Any cultural heritage material encountered will be managed in accordance with the Project's Chance Finds Procedure.	Contractor	Ongoing

Monitoring and Inspection Requirements

Activity	Required Action	Responsibility	Frequency
Survey	Representatives from the Yued Traditional Owner Group will be involved in the heritage surveys.	Contractor / Neoen	As required

6.6 Air Quality and Dust Management

Table 6.6 Air Quality and Dust Management

Air Quality and Dust Management				
Reference Documents	- Environmental Factor Guideline – Air Quality (EPA, 2020). - Draft Guideline: Dust Emissions (DWER, 2021). - A Guideline for Managing the Impacts of Dust and Associated Contaminants from Land Development Sites, Contaminated Sites Remediation, and Other Related Activities(DWER, 2023).			
Objectives	Maintain air quality and minimise emissions.			
Targets	- No complaints raised by stakeholders regarding dust emissions or air quality as a result of Project activities. - No impacts to the water quality of local water bodies as a result of dust emissions and sedimentation. - Minimise medium- and long-term storage of soil and establish stockpiles in areas that are comparatively protected and in accordance with best practice principles for dust management.			
Management Actions				
Phase	Required Action	Responsibility	Timing	
Design	Plant and equipment will be equipped with engineering controls where practicable to prevent dust emissions.	Contractor	Prior to completion of design	
Construction	Project inductions will highlight the importance of minimising dust emissions.	Contractor	Ongoing	
Construction	Clearing of land will be staged to minimise the area of exposed soil.	Contractor	Ongoing	
Construction	Land clearing will not be undertaken in high wind conditions unless dust mitigation measures such as water tanks are being used.	Contractor	Ongoing	
Construction & operations	Where dust is being generated, dust suppression will be applied to the source areas.	Contractor	Ongoing	
Construction	Vehicle movements will be restricted to established roads and tracks, and speed limits will be adhered to.	Contractor	Ongoing	
Construction	Dust suppression and control equipment will be regularly maintained to avoid malfunctions.	Contractor	Ongoing	
Construction	Vehicles, mobile plant, stationary plant and power generation equipment will be regularly serviced and maintained to minimise particulate emissions.	Contractor	Ongoing	

Construction	Topsoil stockpiles will be constructed in an alignment that minimises the area of the stockpile face exposed to the prevailing wind.	Contractor	Ongoing
Construction	Topsoil stockpiles will be treated as required to minimise wind erosion.	Contractor	Ongoing
Monitoring and Inspection Requirements			
Activity	Required Action	Responsibility	Frequency
Inspection	Dust generation levels will be visually inspected and monitored at unsealed areas and at vegetation adjacent to the Project site.	Contractor	Weekly

6.7 Noise and Vibration Management

Table 6.7 Noise and Vibration Management

Noise and Vibration Management				
Reference Documents	• <i>Environmental Protection (Noise) Regulations 1997 (WA)</i>. • Draft Guideline: Assessment of environmental noise emissions (DWER, 2022). • Noise Regulations Fact Sheet – Regulation 13: Construction sites (DWER, 2021). • AS 2436:2010 – Guide to noise and vibration control on construction, demolition and maintenance sites.			
Objectives	• To protect the health and comfort of personnel from noise impacts due to the Project operations. • To avoid or minimise as much as practicable any noise emissions to nearby landowners and sensitive receptors from construction activities.			
Targets	• Noise levels at existing non-involved residential receptors do not exceed trigger levels listed in the <i>Environmental Protection (Noise) Regulations 1997 (WA)</i>. • No complaints received of excessive noise and vibration as a result of Project activities.			
Management Actions				
Phase	Required Action	Responsibility	Timing	
Design	Project design and layout will be developed to ensure operational compliance with the applicable <i>Environmental Protection (Noise) Regulations 1997 (WA)</i> noise limits at existing non-involved sensitive receptors.	Contractor	Ongoing	
Construction	Construction work will be undertaken between 6:30 am and 6:30 pm on any day which is not a Sunday or public holiday, and in accordance with the control of environmental noise practices in Section 4 of	Contractor	Ongoing	

AS 2436:2010 – *Guide to noise and vibration control on construction, demolition and maintenance sites.*

Construction	For construction work outside the above hours, such as weekday evenings, Sunday and public holidays, written notice of the proposed construction work shall be provided to the occupiers of all premises at which noise levels are likely to be above the assigned levels. Notice shall be provided at least 24 hours before commencing the construction works.	Contractor	Ongoing
Construction	The construction equipment used will be the quietest reasonably available.	Contractor	Ongoing
Construction & operations	Vehicles, mobile plant, stationary plant and power generation equipment will be regularly serviced and maintained to minimise noise and vibration levels.	Contractor	Ongoing
Construction & operations	The installation of noise enclosures / screens will be considered for fixed plant and equipment that generate high levels of noise.	Contractor	Ongoing
Construction & operations	Mufflers will be fitted to plant and equipment that have an internal combustion engine.	Contractor	Ongoing
Construction & operations	Noise and vibration complaints will be immediately investigated. Details of the complaint and the management measures implemented will be recorded in the Project's complaints register.	Contractor	Ongoing
Operations	There will be no exceedance of the applicable <i>Environmental Protection (Noise) Regulations 1997 (WA)</i> noise limits at existing non-involved sensitive receptors.	Contractor	Ongoing

Monitoring and Inspection Requirements

Activity	Required Action	Responsibility	Frequency
Monitoring	Noise monitoring will be undertaken in accordance an Operational Noise Management Plan if one is deemed required.	Contractor	As required

6.8 Waste Management

Table 6.8 Waste Management

Waste Management				
Reference Documents	• EP Act. • <i>Environmental Protection (Controlled Waste) Regulations 2004</i> (WA). • <i>Environmental Protection (Rural Landfill) Regulations 2002</i> (WA).			
Objectives	• Waste is managed in a sustainable manner and all materials introduced or produced on-site are disposed of correctly.			
Targets	• Ensure compliance with the site’s waste management procedure at all times. • No incidents of incorrect sorting, storage, or disposal of waste. • No complaints from nearby landowners or authorities on the management or disposal of waste by the Project.			
Management Actions				
Phase	Required Action	Responsibility	Timing	
Design	Infrastructure design will consider specific material needs to avoid over-estimating requirements and excessive waste generation.	Contractor	Prior to construction	
Pre-construction	A suitable and licenced waste disposal facility will be identified and incorporated into the Waste Management Plan / Procedure.	Contractor	Prior to construction	
Approvals	Approvals and Licences (i.e., Works Approval, licence to install apparatus and permit from the Local Government Authority) shall be obtained for wastewater treatment plant discharge.	Neoen	Prior to construction	
Approvals and construction	Any portable temporary toilet facility shall be installed and maintained in accordance with the <i>Health (Temporary Sanitary Conveniences) Regulations 1997</i> , including servicing at least once every two weeks. Portable temporary toilets shall be emptied by an appropriately licensed Controlled Waste contractor.	Contractor	Construction	
Design and construction	Any treated wastewater discharge to the environment (including treated sewerage) shall be fitted with a cumulative volume meter to record the volume of discharge to the environment.	Contractor / Neoen	Construction	
Design and construction	Any portable temporary toilet facility and onsite wastewater treatment plant shall be protected with earthen or similar bunds to reduce the environmental risk of any spills or leaks and protect the system from stormwater.	Contractor	Construction	

	Tanks shall have automatic alerts in the event of faults or high tank levels.		
Construction & operations	A Waste Management Plan / Procedure will be developed specifying wastes that can be disposed to landfill and all waste will be managed in accordance with this procedure.	Contractor	Ongoing
Construction & operations	Sufficient quantities of skips and bins will be available at all work areas.	Contractor	Ongoing
Construction & operations	Any skips and bins with food waste will have a closable lid in place to prevent fauna from accessing the waste.	Contractor	Ongoing
Construction & operations	Skips and bins will be colour coded and clearly labelled to facilitate the segregation of waste types.	Contractor	Ongoing
Construction & operations	Recyclable materials, including cardboard, plastics, aluminium cans, glass, batteries, timber pallets and scrap metal, shall be recycled wherever possible.	Contractor	Ongoing
Construction & operations	All wastes will be disposed / recycled at suitably licensed facilities.	Contractor	Ongoing
Construction & operations	Waste oil containers, oily wastes and similar (i.e. rags, filters, etc.) will be segregated from other wastes, appropriately labelled and stored in bunded areas prior to collection for disposal.	Contractor	Ongoing
Construction & operations	Controlled wastes such as hydrocarbons, oils, fuels, grease and oily wastewater will be transported and managed in accordance with the <i>Environmental Protection (Controlled Waste) Regulations 2004</i> (WA).	Contractor	Ongoing
Construction & operations	Waste receipts will be recorded for all waste disposed of.	Contractor	Ongoing
Construction & operations	Use a hierarchical approach to waste management from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal), and priority waste management strategies to avoid waste generation.	Contractor	Ongoing
Monitoring and Inspection Requirements			
Activity	Required Action	Responsibility	Frequency
Inspection	Waste storage areas will be inspected weekly to ensure they are being managed in accordance with the Project's Waste Management Plan / Procedure.	Contractor	Weekly
Inspection	Temporary toilet facilities shall be inspected and serviced at least once every two weeks.	Contractor	Fortnightly
Inspection	The Project wastewater treatment plant(s) shall be inspected regularly to ensure it is operating in accordance with the licence or permit conditions (pending approval).	Contractor	Weekly

6.9 Hydrocarbon and Chemical Management

Table 6.9 Hydrocarbon and Chemical Management

Hydrocarbon and Chemical Management			
Reference Documents	• <i>Dangerous Goods Safety Act 2005</i> (WA). • Environmental Protection Act 1986 - Home Page (WA). • <i>Environmental Protection (Controlled Waste) Regulations 2004</i> (WA). • Water Quality Protection Note 65: Toxic and hazardous substances storage and use (DWER, 2015). • Water Quality Protection Note 10: Contaminant spills — Emergency Response Plan (DWER, 2020). • Water Quality Protection Note 56: Tanks for fuel and chemical storage near sensitive water resources (DWER, 2018).		
Objectives	• Hydrocarbons and chemicals stored and used in a manner that prevents discharge to the environment.		
Targets	• No hydrocarbon or chemical spills above 20 L during Project activities. • Hydrocarbons and chemicals are stored and handled in bunded areas only.		
Management Actions			
Phase	Required Action	Responsibility	Timing
Construction and operations	Hydrocarbon and chemical storage will be clearly labelled, be above ground and comply with: • Water Quality Protection Note 65: Toxic and hazardous substances storage and use (DWER, 2015). • Water Quality Protection Note 56: Tanks for fuel and chemical storage near sensitive water resources (DWER, 2018). • Australian Standard AS 1940 – The Storage and Handling of Flammable and Combustible Liquids.	Contractor	Ongoing
Construction and operations	Hydrocarbons and chemicals will be stored outside of flood risk areas.	Contractor	Ongoing
Construction and operations	Personnel routinely working in areas containing hydrocarbons and chemicals will undergo spill response training.	Contractor	Ongoing
Construction and operations	Bulk hydrocarbon and chemical storage tanks will be protected by an earthen bund or bollards. They will be located within bunded areas with a capacity of 110% of the storage tank.	Contractor	Ongoing

Construction and operations	Spill control management measures, which include spill clean-up procedures and spill kits will be available across work areas and in particular areas of frequent storage and handling or within 100 m of a watercourse.	Contractor	Ongoing
Construction and operations	Spills will be recorded and cleaned up as soon as practicable to mitigate ongoing pollution. Where a spill occurs within 100 m of a surface water body, the Senior Environmental Advisor will be notified.	Contractor	Ongoing
Construction and operations	Gensets will be bunded and will be subject to regular inspection and maintenance schedule.	Contractor	Ongoing
Construction and operations	Any hazardous materials brought to site will be accompanied by the relevant Material Safety Data Sheet (MSDS).	Contractor	Ongoing
Construction and operations	Refuelling pads (where proposed) will be bunded and stormwater captured for treatment in an oil / water separator.	Contractor	Ongoing
Construction and operations	All hydrocarbon and chemical wastes shall be managed in accordance with the <i>Environmental Protection (Controlled Waste) Regulations 2004 (WA)</i> .	Contractor	Ongoing
Monitoring and Inspection Requirements			
Activity	Required Action	Responsibility	Frequency
Inspection	Bulk hydrocarbon and chemical storage tanks will be inspected for leaks, spills and integrity issues.	Contractor	Weekly

6.10 Fire Management

Table 6.10 Fire Management

Fire Management	
Reference Documents	- Guidelines for Planning in Bushfire Prone Areas V1.4 (Department of Planning Lands and Heritage (DPLH), 2021). - Project Bushfire Management Plan.
Objectives	- Minimise any risk of bushfire ignition during construction and operations of the Project. - Minimise the risk of an externally ignited bushfire from interacting or impacting the Project.
Targets	- No bushfire incidents caused by Project activities. - Bushfire events that originate outside of the Project are managed in accordance with the Project's Emergency Evacuation Procedure.

Management Actions			
Phase	Required Action	Responsibility	Timing
Construction	Signage indicating the location of hydrants or suction points will be erected as soon as they are installed and will be clearly visible on entry to the site.	Contractor	Following installation of firefighting equipment.
Construction	Hot / hazardous works will not be undertaken during a Total Fire Ban or on a day with a Fire Danger Rating of 'Extreme' or 'Catastrophic', unless an approved permit is in place and suitable controls are in place.	Contractor	Ongoing
Construction	Where any flammable / combustible material is brought onsite temporarily (construction or maintenance), the object must be positioned at a distance which is >4 times its own height from other structures and electrical infrastructure.	Contractor	Prior occupancy
Construction & operations	Works will be undertaken in accordance with the Projects Bushfire management Plan.	Contractor	Ongoing
Construction & operations	Asset Protection Zones as nominated within the Project Bushfire Management Plan will be implemented and maintained throughout the Project.	Contractor	Ongoing
Construction & operations	Smoking will be confined to designate smoking areas where butts and ashes can be safely extinguished and disposed of.	Contractor	Ongoing
Construction & operations	Personnel will be aware of the fire danger for each day on site.	Contractor	Ongoing
Construction & operations	Fire extinguishers will be in place at high risk facilities and in site plant and vehicles.	Contractor	Ongoing
Construction & operations	Site personnel shall be trained in the use of fire extinguishers.	Contractor	Ongoing
Construction & operations	The under carriage and radiators of site plant and vehicles shall be free from vegetation.	Contractor	Ongoing
Construction & operations	There will be no burning of any material permitted on site.	Contractor	Ongoing
Construction & operations	Where hot works (e.g. welding) are required, the immediate surrounding area will be cleared of combustible material and a fire extinguisher will be located within 10 m.	Contractor	Ongoing

Construction & operations	In the event of a fire that cannot be extinguished, personnel shall notify the emergency contact numbers and evacuate to pre-arranged assembly points.	Contractor	Ongoing
Operations	The bushfire specific content of the operation's site emergency plan will be reviewed annually, and any relevant information updated or communicated to personnel to ensure all bushfire related preparation procedures are carried out.	Contractor / Neoen	Ongoing
Operations	All full-time operational personnel will undergo bushfire awareness training and at least one full-time operational personnel will have specific knowledge of the site procedures in response to bushfire. This staff member will either be regularly on-site during operations or otherwise readily contactable.	Contractor / Neoen	Ongoing
Monitoring and Inspection Requirements			
Activity	Required Action	Responsibility	Frequency
Inspection	All fire fighting equipment and infrastructure shall be inspected accordance with Australian Standards (AS1851: Maintenance of fire protection systems) to ensure they are full and within their test date. Testing intervals shall be recorded on a label or metal tag attached to the unit.	Contractor	Six monthly
Testing	The emergency response processes shall be tested regularly to review the effectiveness of the planned response and preparedness.	Contractor	Annually

6.11 Demobilisation and Rehabilitation

Table 6.11 Demobilisation and Rehabilitation

Demobilisation and Rehabilitation				
Reference Documents	- Project Decommissioning Plan. - Project Native Vegetation Clearing Permit.			
Objectives	To maximise the final area of rehabilitated or revegetated land.			
Targets	- Ensure landscaping is undertaken in a manner that provides benefits to the local environment by utilising local species and verifying seed provenance. - Utilise landscaping to reduce the overall visibility of the Project and potential for noise emissions to sensitive receptors.			
Management Actions				
Phase	Required Action	Responsibility	Timing	
Demobilisation	All material introduced or produced on-site that is not required for the ongoing operations of the Project will be removed and disposed of appropriately. No materials or equipment will be left on-site and all areas utilised during construction will be returned to their former state.	Contractor	Post-construction	
Demobilisation	Contaminated soil areas will be remediated.	Contractor	Ongoing and at demobilisation	
Rehabilitation	Residual stockpiles will be incorporated into the surrounding landscape and graded wherever practicable at the end of construction.	Contractor	Post-construction	
Decommissioning	All Project infrastructure, plant and equipment will be removed as per the project Decommissioning Plan.	Contractor	End of Project	
Monitoring and Inspection Requirements				
Activity	Required Action	Responsibility	Frequency	
Inspection and monitoring	Rehabilitated areas will be inspected and monitored in accordance with the relevant permits.	Contractor	As required	

7.0 Monitoring and Reporting

7.1 Monitoring

Monitoring will be performed throughout the Project, typically to meet legal and approval requirements. Known monitoring requirements are presented throughout **Section 6.0** and summarised in **Table 7.1** below. **Table 7.1** is a live register and will be updated as required.

Table 7.1 Project Monitoring Requirements

Description of Monitoring	Responsibility	Frequency
Total area cleared and the location of clearing completed will be recorded within a centralised dataset and reviewed on a regular basis to ensure there is no exceedance of the permitted area to be cleared.	Contractor	Monthly
Undertake weed monitoring and inspections as per the Project Weed Management Procedure.	Contractor	Ongoing
Dust generation levels will be visually monitored at unsealed areas and at vegetation adjacent to the Project site.	Contractor	Weekly
Noise monitoring will be undertaken in accordance with the Operational Noise Management Plan.	Contractor	As required by Plan
Rehabilitated areas will be monitored in accordance with the relevant permit.	Contractor	As required

7.2 Reporting

Reporting of progress and activities will be required to ensure compliance with the regulatory commitments and obligations of the Project. Some reporting events will be for the purposes of internal record-keeping should a future audit be required whereas others will provide evidence to regulators of compliance with licence or permit conditions. Reporting that is required as part of the project is detailed in **Table 7.2**.

Table 7.2 Project Reporting Requirements

Report Type	Responsibility for Preparing	Timing / Frequency	Submitted to and Reviewed by:	Submitted Externally to:
Progress reports	Contractor	Weekly	PM	N/A
Native vegetation clearing shapefiles	Contractor	At completion of each round of native vegetation clearing undertaken	Senior Environmental Advisor	N/A
Native vegetation clearing report	Contractor	Annually	Senior Environmental Advisor	N/A

Report Type	Responsibility for Preparing	Timing / Frequency	Submitted to and Reviewed by:	Submitted Externally to:
Waste quantity reports	Contractor	Quarterly	Senior Environmental Advisor	N/A
Non-compliance reports	Contractor	As required	Senior Environmental Advisor	N/A
Corrective action reports	Contractor	As required	Senior Environmental Advisor	N/A
New heritage finds	Contractor	As required	Senior Environmental Advisor	DPLH

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Appendix A

Neoen HSE Policy





Neoen HEALTH, SAFETY & ENVIRONMENTAL (HS&E) POLICY

Neoen is committed to provide a healthy and safe working environment for its employees, guarantee the integrity of the company's assets and protect the environment.

At Neoen, we believe:

- All accidents and damages to the employees, contractors, customers, off-takers, visitors, property, the environment and surrounding communities can be avoided and we will undertake all appropriate measures with the goal of eliminating all of them.
- Health, Safety and Environmental management is a daily individual and team responsibility.
- Each company member must be dedicated to conduct all required activities in order to develop the proper attitudes and practices, with the greatest concern for employees' health & safety , the environment and local communities.
- All of us should actively contribute to HS&E programs during the development, construction and operation of Neoen's assets, and seek to achieve an accident free work environment for Neoen employees, its customers and its contractors.

Accordingly, Neoen is committed to:

- Meeting or exceeding all applicable Health, Safety & Environmental laws or regulations.
- Pursue the objective of no harm to people, the company's assets and no damage to the environment or the local communities.
- Minimize adverse impacts of our activities to the environment and the ecosystem , optimize the social impact to the communities in the surrounding of Neoen's facilities, and preserve the local cultural heritage.
- Taking actions to prevent pollution and promoting the sustainability of the natural resources that we use.
- Manage the HS&E matters as any other critical business activity in the company, with a continuous performance improvement mindset.
- Provide guidance, support and training to our personnel and contractors in order to create and maintain a best in class HS&E culture.

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CEO



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