18.1 Introduction

The Draft Statement of Commitments has been prepared in accordance with section 75F (6) of the EP&A Act. The inclusion of appropriate environmental management measures into the detailed design and construction of the project would minimise potential adverse impacts on the environment. The proposed adoption of the relevant measures identified in the Draft Statement of Commitments into a Construction Environmental Management Plan (CEMP) and Operation Environmental Management Plan (OEMP) would be an important component of the proposal and reiterate the commitment of SEFE and its contractors to the mitigation of environmental impacts identified in this assessment.

The Draft Statement of Commitments describes the environmental management to be undertaken during the construction and operation of the 5.5 MW Biomass Power Plant.

18.2 Environmental Management

Construction Environmental Management Plan

Environmental management during the construction phase of the proposed Power Plant would be undertaken in compliance with the requirements of a Construction Environmental Management Plan (CEMP). The CEMP is an administrative tool outlining environmental management practises, safeguard measures to be implemented, timing of their implementation, and management and monitoring of the process and procedures.

The key objectives of the CEMP would include:

- ensuring that works are carried out in accordance with appropriate environmental statutory requirements, the conditions of approval for the project, relevant guidelines and existing environmental management systems and procedures at the SEFE facility;
- ensuring that works are carried out in accordance with the goals and requirements presented in the Environmental Assessment;
- ensuring that works are carried out in such a way as to minimise the likelihood of environmental degradation occurring;
- ensuring that works are carried out in such a way as to manage the impact of the works on neighbouring land uses;
- ensuring that all employees engaged in the works comply with the terms and conditions of the CEMP;
- providing clear procedures for management of environmental impact including corrective actions; and
- identifying management responsibilities and reporting requirements to demonstrate compliance with the CEMP.

The CEMP would serve as a working document to be used during the implementation of the proposal.

Chapter 18 Draft Statement of Commitments

Generally the Construction EMP will include:

- establishment of environmental goals and objectives;
- conditions of project approval;
- lists of actions, timing and responsibilities;
- identification of areas of responsibility for environmental management of the project;
- statutory requirements – licences and approvals required;
- a structured reporting system detailing all relevant matters on a regular basis;
- procedures and forms for documentation and reporting of issues;
- training of personnel in environmental awareness;
- guidelines for emergencies, contact names and corrective actions for non-conformance and notifications to appropriate authorities and affected parties;
- auditing implementation of the CEMP;
- review procedures and protocols for modification of the CEMP;
- complaint handling procedure;
- site management and control procedures; and
- monitoring procedures.

Specifically, the CEMP would provide management actions in relation to:

- erosion and sediment control;
- surface water management;
- waste generation and disposal;
- flora and fauna management;
- aquatic ecology management;
- Aboriginal cultural heritage;
- the control of atmospheric emissions;
- the control of construction traffic movements; and
- the control of noise emissions.

Operational Environmental Management Plan

An Operational EMP (OEMP) would be prepared for the proposed Power Plant, which would address the key ongoing monitoring requirements. The OEMP for the operational phase would include:

- details of proposed maintenance and monitoring programs;
- responsibility for maintenance and monitoring;
- reporting requirements;
- permits, approvals and consents issued under the approval process;
- the appropriate standards and protocols for the necessary controls, monitoring and remediation measures;
- auditing procedures;
- response plans for contingency events;
- properly established operating procedures;
- environmental training and education;
- monitoring system, review of plans and progress toward achieving objectives and goals;
- non-compliance handling procedures;
- environmental quality controls; and
- plant closure and rehabilitation plan.

18.3 Environmental Safeguards

A number of environmental safeguards and mitigations measures to prevent or minimise environmental impacts that may be generated by the construction and operation of the biomass Power Plant are proposed. These measures would be incorporated in both EMPs and implemented throughout the life of the project.

Table 18-1 summarises these safeguard measures, sets out priorities for implementation (construction and operation), and lists the responsibility for ensuring that these safeguard procedures are undertaken.

Chapter 18 Draft Statement of Commitments

Table 18-1 Summary of Mitigation Measures and Commitments

Item	Mitigation Measures / Commitments	Implementation	Responsibility
Marine Water Quality			
A1	Additional near-field modelling will be undertaken to further optimise the design of the diffuser during the detailed design phase of the project.	Design / preconstruction	SEFE
A2	Once the diffuser becomes operational, a model validation exercise will be undertaken with the objective of validating the findings of the near-field model predictions for dilution with distance from the diffuser.	Operation	SEFE
Marine Ecology			
B1	During detailed design, the inlet and outlet design will be optimised taking into account mixing characteristics and ecological considerations.	Design / preconstruction	SEFE / design engineers
B2	A management plan would be prepared to mitigate any potential encounters with marine mammals.	Preconstruction	Construction contractor
B3	A spill management plan would be prepared.	Preconstruction	Construction contractor
B4	Works on the seawater cooling facility along the jetty would be avoided during the southern migratory cetacean period.	Construction	SEFE
B5	Divers would be inducted and made aware of the ecology of the site, the importance of working in a manner to limit habitat disturbance and disturbance to weedy seadragons and on avoiding contact with marine mammals.	Construction	Construction contractor
B6	Only the minimal amount of attached flora and fauna on the jetty will be removed during the installation of the inlet and outlet pipes.	Construction	Construction contractor
B7	Concrete footings for the inlet and outlet pipe would be placed in an area with limited habitat potential. Any visible benthic invertebrates would be relocated to nearby habitat prior to the placement of the footing.	Construction	Construction contractor
B8	All works will be undertaken to limit sediment disturbance.	Construction	Construction contractor
B9	Construction workers would be inducted on the importance of maintaining the area clean and devoid of marine debris.	Construction	SEFE
B10	Discussions will be held with DECCW and DPI (Fisheries) on the need for a marine monitoring program.	Preconstruction / Operation	SEFE
B11	Discussions will be held with DECCW and DPI (Fisheries) on the need to monitor copper concentrations in the area surrounding the outlet.	Operation	SEFE

Item	Mitigation Measures / Commitments	Implementation	Responsibility
Terrestrial Ecology			
C1	Areas identified for clearing should be clearly marked prior to construction using highly visible flagging tape or spray paint to prevent unnecessary clearing.	Preconstruction	Construction contractor
C2	Maintain low vehicle speeds to reduce fauna fatalities.	Construction / operation	SEFE / Construction contractor
C3	Limit vehicular and personnel entry into retained vegetation through exclusion fencing, locating access roads and paths to avoid habitat and use of signage.	Construction / operation	SEFE / Construction contractor
C4	Employ down-lights and motion sensor lighting to reduce light spill and the associated secondary impact on nocturnal fauna potentially using adjoining vegetation.	Operation	SEFE
C5	Implement sediment and erosion control measures to manage disturbance to the site.	Construction	Construction contractor
C6	Implement weed control measures.	Construction / operation	SEFE
C7	Replant cleared areas with indigenous native vegetation and spread layers of clean mulch to limit the potential for colonisation by weeds.	Construction / operation	SEFE
Air Quality			
D1	A Construction Environmental Management Plan will be prepared to addresses air monitoring and management.	Preconstruction / construction	Construction contractor
D2	In dry, windy conditions, water sprays would be used to dampen down soils prior to excavation and handling. Exposed surfaces and stockpiles would also be watered, sprayed or covered where required.	Construction	Construction contractor
D3	Vehicles would only be loaded to less than the height of the side and tailboards and loads of fill would be covered during transport. Any soil adhering to the undercarriage and wheels of trucks would be removed prior to departure from the site.	Construction	Construction contractor
D4	Any long-term stockpiles would be stabilised using fast-seeding grass or synthetic cover spray.	Construction	Construction contractor
D5	All major access roads are sealed and vehicle speeds on unsealed site areas would be controlled to minimise dust.	Construction	Construction contractor
D6	The operation of the facility would not occur during maintenance on the ESP.	Operation	SEFE

Chapter 18 Draft Statement of Commitments

Item	Mitigation Measures / Commitments	Implementation	Responsibility
D7	Control of emissions during 'start-up' will be via an Air Quality Management Plan for the facility.	Operation	SEFE
Noise			
E1	Predicted noise levels would be verified during commissioning. In the unlikely event of any significant discrepancies from this assessment, additional attenuation measures such as enclosures, silencers and noise barriers would be considered.	Operation	SEFE
Hazard and Risk			
F1	Manage the Power Plant consistent with current bush fire management practices employed on the site.	Preconstruction / construction / operation	SEFE
F2	Ensure that the Power Plant is included in the sites emergency response procedures.	Preconstruction / construction / operation	SEFE
F3	Maintain existing APZs along all boundaries consistent with *Standards for Asset Protection Zones* (RFS 2007).	Preconstruction / construction / operation	SEFE
F4	Maintain the current water supply to the site and ensure water supply tank(s) contain Storz fittings compatible with RFS hoses.	Preconstruction / construction / operation	SEFE
F5	Where practicable, provide landscaping that includes the following features: • tree canopy separation by at least 2m; • discontinuous shrub layer (clumps or islands of shrubs where possible; not rows); • vertical separation between canopy and shrub layer; • tree canopies not overhanging structures; • no landscaping trees within 2m of any building; • use of non-combustible mulch; and • use of 'fire retardant' species of local provenance.	Preconstruction / construction / operation	SEFE
F6	Sediment, dust and run-off would be managed during construction.	Construction	Construction contractor
F7	Ash disposed of on-site will go direct to landfill and will not be stockpiled.	Operation	SEFE
Traffic and Transport			
G1	Princes Highway and Edrom Road would be inspected for overhead branches / powerlines and squeeze points prior to a construction traffic management plan being developed.	Preconstruction	SEFE
G2	A construction traffic management plan will be prepared.	Construction	Construction contractor

Item	Mitigation Measures / Commitments	Implementation	Responsibility
G3	Consultation with the local council and / or the RTA will be held on the transport of over-mass and over- dimensional loads. Appropriate permits will be obtained.	Preconstruction	SEFE
Heritage			
H1	If Aboriginal objects or historic relics are uncovered work would cease in the vicinity of the find/s and advice sought from DECCW on a suitable course of action.	Construction	Construction contractor / SEFE
Visual and Landscape			
I1	Materials used in the construction of the Power Plant would be generally dark in tone and where possible non reflective.	Construction	Construction contractor
I2	Lighting would avoid direct line of sight to distant view locations.	Operation	SEFE
I3	The top of the stack would not have lighting.	Operation	SEFE
I4	Large floodlights will only be used for emergency lighting.	Operation	SEFE
I5	Security lighting would not spill onto neighbouring areas. This would be achieved through the use of down lights and motion sensor lighting.	Operation	SEFE
Landuse			
J1	SEFE will obtain approval from DECCW to apply ash.	Preconstruction	SEFE
J2	Soil samples will be collected and analysed three years after the initial application to confirm application rates and to determine whether additional applications of ash can be made to treated sites.	Operation	SEFE
J3	There would be at least 6 years between treatments, unless soil testing shows that shorter return periods are possible, without adversely affecting the site.	Operation	SEFE
J4	Spreading operations will be kept at least 100 m from any nearby dwelling and at least 15 m from all other property boundaries.	Operation	SEFE
J5	Ash will be incorporated into the upper level of the A1 Horizon by light scarification.	Operation	SEFE