BGIS

ENVIRONMENTAL MANAGEMENT PLAN

Melbourne Market Authority

16 August 2024

MMA-HSEQ-PLAN-03 Version 1.1

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Document Control

Table 1 Amendment details

Document No.	Document Name	Version	Revision date	Section revised & change reference
EMP-MMA-G-001	MMA Environmental Management Plan	1.0	1/03/2024	Initial version
MMA-HSEQ-PLAN-03	MMA Environmental Management Plan	1.1	16/08/2024	Document renumbered and entire document updated to reflect contract requirements

Traceability Matrix

Table 2 Management plan requirements

Reference	Requirement	Section
5.10	The Service Provider:	
a)	must comply with all Statutory Requirements for the protection of the environment;	1.5
b)	ensure protection of the environment have been met;	8.2, 8.3
c)	must in performing the Services deal with and dispose of hazardous materials in accordance with all requirements of law;	7.5
d)	must not pollute, contaminate or otherwise damage the environment;	7.5
e)	maintain all regular air, noise and water quality measurement systems	8.1
f)	co-ordinate for periodic, one off or incident related monitoring	8.1
g)	is responsible for and must at its own cost make good any pollution, contamination or damage to the environment to the extent caused by: i) the performance of the Services, whether or not it has complied with the requirements of the Contract for the protection of the environment; or ii) a failure to perform the Services in accordance with the Contract;	8.5
h)	immediately notify the Authorised Representative and any relevant Contract Manager of: i) any non-compliance with the requirements of this clause 5.10; ii) a breach of any Statutory Requirement relating to the environment or any other incident which could have an adverse effect on the environment of any person at the Melbourne Market; iii) the receipt of any notice, order or communication received from any relevant Authority in connection with environment at the Melbourne Market; iv) its recommendation for fully addressing (both retroactively and proactively) the issue under subparagraph (i), (ii) or (iii);	6.2.1
i)	take all such steps as the Authorised Representative or relevant Contract Manager may require addressing any issue notified under paragraph (f) or otherwise identified by the Authorised Representative or the relevant Contract Manager.	8.5

j)	ensure that all Subcontractors comply with the requirements of this clause 5.10 and prepare site environment plans to the reasonable satisfaction of the Service Provider;	4.3
k)	provide all necessary data and information necessary for MMA to meet its environmental reporting obligations;	8.4
l)	maintain systems sufficient to measure, monitor and report energy consumption;	8
m)	collect and collate data and records relative to energy consumption;	8.4
n)	co-ordinate consulting advice to provide analysis on consumption trends and make recommendations to MMA on appropriate measures to improve energy efficiency;	8.6
o)	introduce and monitor energy saving initiatives;	8.6, 8.1
p)	maintain systems sufficient to measure, monitor and report water consumption and waste water output, including for the first flush filtration system, roof collection and the wetlands;	8.1
q)	collect and collate data and records relative to water consumption and water waste;	8.1
r)	co-ordinate consulting advice to provide analysis on consumption trends and make recommendations to MMA on appropriate measures to improve water efficiency;	8.6
s)	introduce and monitor water reduction initiatives;	8.6, 8.1
t)	advise MMA on waste reduction strategies to meet mandated requirements;	8.6
u)	analyse local recycling service providers and advise MMA on initiatives, service changes and prices;	8.6
v)	collect, collate, analyse and report data on waste quantities and rebates;	8.4
w)	develop, and if required by MMA, implement waste reduction strategies and plans as directed;	8.6
x)	manage the capture of waste data, including types of waste, volumes of waste and waste channels;	8.1, 8.4
y)	identify, analyse and recommend any improvement strategies to either reduce the volume of waste or divert it away from landfill;	8.6
z)	ensure waste transfer station is managed and performance of Subcontractors is monitored	8 (8.2)
aa)	take all necessary actions to ensure compliance with Environmental Management Plan and waste management plan	8.3
bb)	ensure waste is appropriately recycled where possible, whether this is to charitable organisations, the zoo or cardboard recycling	7.5.2
cc)	develop and implement initiatives to reduce waste and improve levels of recycling, which may include commercial use of waste transfer station and recycling facilities;	8.6
dd)	provide support to MMA in the implementation of environmental sustainability initiatives;	4.1, 8.6
ee)	identify opportunities for MMA to expand its environmental sustainability initiatives;	8.6
ff)	work with MMA and Tenants to develop knowledge and awareness of environmental initiatives;	7.2.1
gg)	assist MMA in developing its environmental management communications strategy;	7.2.1
hh)	consultation with regulatory and local governmental authorities as required;	7.2

ii)	appoint (and provide written notice to the Authorised Representative and relevant Contract Manager no later than 30 days before the end of the Transition In Period) a schedule of environment representatives setting out the representatives with full responsibility for ensuring compliance with this clause 5.10 at the Melbourne Market; and	n/a
jj)	for the purposes of ensuring compliance with the requirements of clause 5.10: i) subject to clause 4.1.2c), on a continuous basis throughout the Contract Term, update and improve the Environmental Management Plan in accordance with the requirements of clause 5.1.1 and clause 30 Service Delivery Documents, including with a view to fully taking into account and addressing all matters notified under paragraph (f);	4.4
	ii) ensure that the Environment Management Plan complies with the requirements of ISO 14001 Environmental Management standards; and	8.3
	iii) implement the Environmental Management Plan as amended from time to time under subparagraph i).	7

1. Summary

1.1 Overview

Melbourne Market Authority (MMA) is a Statutory Body of the State of Victoria. A wholesale fruit, vegetable and cut flower trading centre, one of six central fresh produce markets in Australia, MMA operates from a purpose-built facility on a 67-hectare site at Epping. It provides the critical link between growers, wholesalers, retailers, and the fresh produce supply chain.

BGIS has entered into a Facilities Management Services Contract (Contract No: FSM202309) to provide Operational Services to MMA. Operational Services are Services performed to maintain the general operation of the Melbourne Markets so as to mitigate business disruption through the planned and proactive provision of Services to all Assets located at the Melbourne Market.

BGIS is committed to sustainable environmental management and, as such, has developed this Environmental Management Plan (EMP) to facilitate best practice and compliant environmental management with respect to its operations on the MMA.

In performing the Services, BGIS must ensure:

- no industrial waste or hazardous substance is abandoned or dumped by the BGIS or any of its Associates on the Melbourne Market or handled in a manner which is likely to cause hazard to persons, the Melbourne Market, or the environment or a breach of any Legislative Requirement relating to the environment;
- no unreasonable odour, vibration or noise is released or emanates from the Melbourne Market; and
- it complies (and its suppliers and vendors comply) with all Legislative Requirements relating to the environment.

This EMP provides an overview of the structured approach BGIS takes to implementing and managing environmental issues.

The MMA EMP is part of a suite of documents that describe the policies, procedures, work practices, liaison procedures and other operational matters in respect of the delivery of the MMA contracted Services. The EMP should be read in conjunction with other documents within this suite of documents, shown in Figure 1.

This plan should also be read in conjunction with:

- Enterprise Risk Management Policy and Framework
- Training Needs Analysis
- Account Network Drive Folder Structure
- Policy – Group Environmental
- Vendor Management
- Integrated Management Plan
- Management Planning and Review
- Document Control Management
- Internal and External Audits
- Document Record Management
- Non-conformance and Corrective Actions Procedure

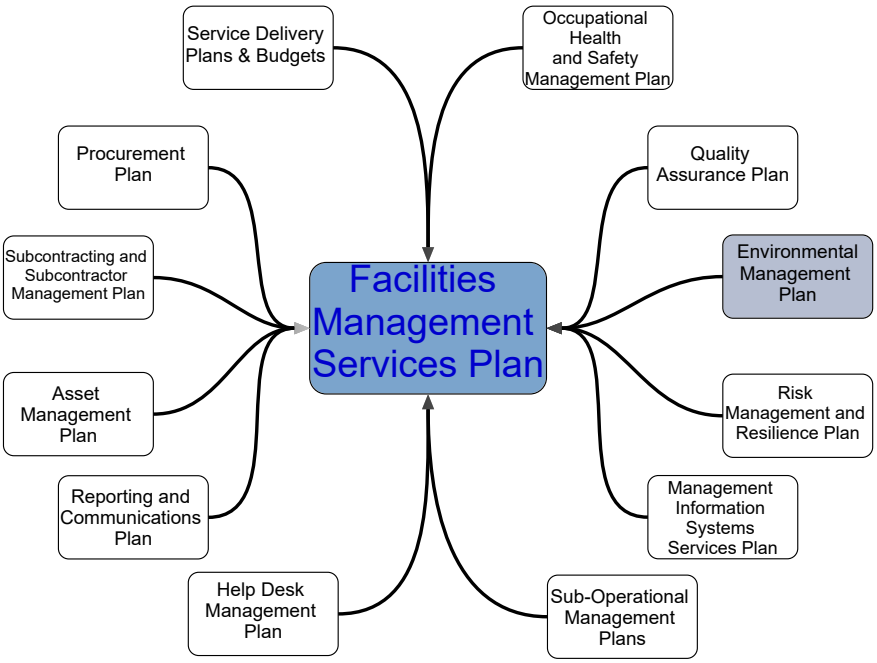

Figure 1 Service delivery documents

At a corporate level, BGIS has an integrated management framework that is applied throughout the business and on all corporate activities and accounts as well as projects. This EMP falls under and within the corporate Environmental Management System (EMS) framework. This document conforms to overarching BGIS Integrated Management System, which is certified to ISO 14001:2015 (Environmental Management Systems).

This document consists of:

- An overview of the Environmental Management System (EMS)
- The organisational structure for environmental management
- Applicable compliance obligations/ legislative requirements/ codes of practice
- Environmental risk management processes
- Environmental incident management processes
- Plans and processes to implement, monitor, measure and evaluate environmental performances.

1.2 Scope

This EMP covers the environmental requirements of the works provided under the MMA Facilities Management Services Contract on site at the Melbourne Market Authority, 55 Produce Drive, Epping. Particulars of the contract Scope of Works are detailed in the Facilities Management Services Plan.

The purpose of this Environment Plan is to describe how the requirements of the AS/NZS ISO14001:2015 Environment Management System Standard are met by the MMA contract team in the delivery of services. The objectives of the Plan are to:

- Support the BGIS Environmental Policy
- Outline core environmental processes such as environmental objectives and plans
- Descried the process of managing significant environmental impacts
- Describe policies, objectives and planning

- Assign responsibilities for implementing the EMP; and
- Define methods of monitoring performance and measuring continual improvement.

1.2.1 Exclusions

No exclusions have been identified.

1.3 Context of the Organisation

1.3.1 Internal and External Issues

BGIS conducts all business activities within five (5) core values:

1. Unwavering integrity
2. Memorable customer experience
3. Engage people
4. Living sustainably
5. Passion for innovation.

Due to their effect or potential effect on BGIS' ability to consistently provide services embodied within these core values that meet our customers and applicable statutory and regulatory requirements, BGIS have determined that the identified items within the risk and opportunities register are the internal and external influences deemed relevant to the MMA.

1.3.2 Interested Parties

Interested parties are identified and documented in *BGIS ANZ Risk Register* along with existing and additional control measures.

At Account level, all interested parties and its associated potential risks/issues to processes must be conducted during the transition of the new account and documented in the *OHS, Environmental or Quality Assurance Plan* or *Facilities Management Services Plan*.

In accordance with *Document Control Management* the Account Manager is responsible to review the *OHS, Environmental and Quality Assurance Plan* and *Facilities Management Services Plan* at least once a year and more frequent if it is deemed to be as required.

Due to their effect or potential effect on BGIS' ability to consistently provide services that meet our customers and applicable statutory and regulatory requirements, BGIS have determined the following are interested parties deemed relevant to the MMA contract.

Table 3: Interested Parties

Description	Internal	External	Needs and Expectations
Customer (MMA)	☒	☒	BGIS prides itself on providing a **Memorable Customer Experience** and works to provide services to our clients based upon their individual needs. Gathering the client requirements and delivering upon client expectations is outlined in detail in client contracts and Statements of Work. BGIS **Engage People** to ensure each and every employee is provided with the support they

Description	Internal	External	Needs and Expectations
			require to not only meet client requirements but also develop professionally.
Directors	☒	☐	BGIS Directors provide **Unwavering Integrity** and leadership to ensure success of the business and maintain a profit margin. Directors work towards expansion of the business and create sustainable longevity of operations.
Environmental State, Territory and Commonwealth Regulators	☐	☒	BGIS work closely with regulators to ensure it mitigates incidents and complies with legislative requirements. Regulators expect BGIS to understand and comply with legislation, including incident notification, HRCW licencing requirements and cooperation with Inspectors. Trade licences. We must communicate notifiable incidents.
Industry Partners	☐	☒	BGIS participates in many industry events to both obtain and contribute to the evolution of our industry. BGIS also participates in FMA functions and conferences and other such industry events to ensure sharing of knowledge. **Living Sustainably** remains at the forefront of our business and is an input into how we deliver our services and any impacts to our Integrated Management Systems. BGIS has embraced and implemented the Hargraves Catalyst Program to provide a framework in which to allow all workers to demonstrate a **Passion for Innovation**. BGIS has partnered with Trimble to explore future developments which can be cascaded to clients therefore providing an increased service.
Insurers	☐	☒	BGIS works closely with insurers to ensure minimisation of risk, assurance of profit and reduction in premium overheads.
Shareholders	☒	☒	BGIS conducts all its operations with **Unwavering Integrity** to ensure profit, increase in dividend and security.
Local Councils	☐	☒	BGIS conducts all its operations with **Unwavering Integrity** to ensure local regulations are not impacted and compliance with bylaws
General Public	☐	☒	Whilst not applicable to MMA, BGIS operations staff should be mindful that a number of the facilities that BGIS manage on behalf of our clients have general public areas. BGIS strive to consistently demonstrate a **Passion for Innovation** in providing environments conducive to managing the facilities with the general public safety in mind.

Description	Internal	External	Needs and Expectations
Vendors	☐	☒	BGIS collaborate closely with vendors to ensure minimisation of risk, assurance of service retention, maximization of asset life expectancy and return on investment for clients, **Living Sustainably** and development of a **Passion for Innovation**.
Internal BGIS affiliates e.g. BGIS Canada, North America	☒	☐	BGIS collaborates closely with internal BGIS affiliates to ensure minimisation of risk, consistency in application and leveraging technologies through **Passion for Innovation**.
Health & Safety	☒	☐	The adoption of management plans is a strategic decision for BGIS that can help to improve its overall performance and provide a sound basis for sustainable development initiatives. The potential benefits to BGIS of implementing management plans is based on ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 are: • The ability to consistently provide products and services that meet client and applicable statutory and regulatory requirements; • Facilitating opportunities to enhance client satisfaction; • Addressing risks and opportunities associated with its context and objectives; • The ability to demonstrate conformity to specified requirements.
Quality	☒	☐	
Transitions	☒	☐	
Customer Solutions	☒	☐	
Technical	☒	☐	
Environment and Sustainability	☒	☐	
Procurement	☒	☐	
Project Management	☒	☐	
Real Estate	☒	☐	
Management Information Services	☒	☐	
Finance	☒	☐	
Legal	☒	☐	
Client Solutions, incorporating: • Bids • Marketing	☒	☐	
People and Culture, incorporating: • Human Resources • Learning and Development • Recruitment	☒	☐	
Corporate Services, incorporating: • IT Helpdesk • Accounts Payable	☒	☐	
Innovation	☒	☐	

Description	Internal	External	Needs and Expectations
Corporate Growth (incl. Risk and Compliance)	☒	☐	
Workplace Solutions	☒	☐	

1.3.3 Analysis

When planning the MMA contract shall consider the issues referred in section 7.5 and determine the risks and opportunities that need to be addressed to:

- Give assurance that the intended result(s) can be achieved;
- Enhance desirable effects;
- Prevent, or reduce, undesired effects; and
- Achieve improvement.

1.4 Definitions

Table 4: Definitions

Term/ Acronym	Definition
AS/NZS	Australian and/or New Zealand Standard
Avetta	A BGIS system utilised for the management of subcontractor and vendor company level accreditations
Continual Improvement	Process of enhancing the environmental management system to achieve improvements in overall environmental performance in line with organisations environmental policy
DEC	Department of Environmental and Conservation
EMP	Environmental Management Plan. A site or project specific plan developed to ensure that appropriate developed to ensure appropriate environmental management practices are followed during the construction and/or operation of a project (this document)
EMS	Environmental Management System. BGIS corporate system that integrates policy, procedures and processes for training personnel, monitoring, summarising, and reporting specialised environmental performance information to internal and external stakeholders.
Environment	Under the MMA contract, Environment means: • the physical factors of the surroundings of human beings including the land, waters, atmosphere, climate, sound, odours and tastes; • the biological factors of animals and plants; and • the social factor of aesthetics.
Environmental Aspect	Element of an organisation's activities, products or services that can interact with the environment
Environmental Impact	Any chance to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services

Term/ Acronym	Definition
Environmental Management Policy (Environmental Policy)	Statement by the organisation of its intentions and principles in relation to its environmental performance which provides a framework for action and for the setting of its environmental objectives and targets
Environmental Management System (EMS)	The part of an organisation's overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy
Environmental Management System Audit	Systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation's environmental management system confirms to the environmental management system audit criteria set by the organisation and for the communication of the results of this process to management
EWMS	Environmental Work Method Statement
HSEQ	Health Safety Environment Quality
MMA	Melbourne Market Authority
SDS	Safety Data Sheet

1.5 Legal and Other References

A regular update on environmental legislation changes sent by Worksafe via email will be regularly reviewed by the corporate Sustainability Manager to ensure compliance obligations are met. Changes to the register will be made and email communications will be sent to the MMA Contract Manager.

Review of environmental legislation changes will be documented under SUS-T-016 Review of Environmental Legislation Changes.

Table 5: Environmental Legislative Regulation and Guidelines

Environmental Legislation Regulations	
Acts	
Contaminated Land Management Act 1979 Environmentally Hazardous Chemicals Act 1985 Environmental Planning and Assessment Act 1979 Heritage Act 1977 Land and Environmental Court Act 1979 Local Government Act 1993 National Parks and Wildlife Act 1974	Ozone Protection Act 1989 Pesticides Act 1999 Protection of the Environmental Operations Act 1997 Soil Conservation Act 1938 Waste Avoidance and Resource Recovery Act 2001 Water Act 1912
Regulations	
Contaminated Land Management Regulation 2013 Environmentally Hazardous Chemicals Regulation 2008 Environmental Planning and Assessment Regulation 2000 Heritage Regulation 2012 – various amendments and Regulations Land and Environmental Court Regulation 2005 Local Government (General) Regulation 2005	Protection of the Environmental Operations (Clean Air) Regulation 2010 Protection of the Environmental Operations (General) Regulation 2009 Protection of the Environmental Operations (Noise Control) Regulation 2008 Protection of the Environmental Operations (Waste) Regulation 2005

Environmental Legislation Regulations	
National Parks and Wildlife Regulation 2009 Pesticides Regulation 2009	
Commonwealth (National) Environmental Legislation	
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 Environmental Protection and Biodiversity Conservation Act 1999 National Environmental Protection Council Act 1994 National Greenhouse and Energy Reporting Act 2007	Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 Product Stewardship Act 2011 Water Efficiency Labelling and Standards Act 2005
Commonwealth National Environmental Protection Measures	
National Environmental Protection (National Pollutant Inventory) Measures 1998 National Environmental Protection (Ambient Air Quality) Measure 1998 National Environmental Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013)	National Environmental Protection (Diesel Vehicle Emissions) Measure 2001 National Environmental Protection (Used Packaging Materials) Measure 2011 National Environmental Protection (Air Toxics) Measure 2011
Guidelines	
Air Quality Guidance Notes for Construction Sites Assessing Significance for Historical Archaeological Sites and Relics Assessing Vibration – Technical Guidelines (2006) – DEC (EPA) AS1055 Australian and New Zealand Guidelines for Fresh and Marine Water Quality (2000) Technical Guidelines to Minimise Blasting Overpressure and Ground Vibration	Environmental Management Systems Guidelines for the Construction Industry Interim Construction Noise Guideline Know Your Responsibilities – Managing Waste From Construction Sites Managing Urban Stormwater – Soils and Construction National Australian Built Environmental Rating System (NABERS Energy) Waste Classification Guidelines Part 1: Classifying Waste (DECCW:2009)

2. Environmental Management System Framework

2.1 Approach to Environmental Management

Environmental management at BGIS is based upon the ongoing development and implementation of Environmental Management System (EMS) certified to ISO 14001:2015.

BGIS is continuously seeking to improve environmental culture and standards by utilising life cycle thinking perspective across its business and the broader industry. BGIS works with its clients to integrate environmental management controls at the earliest opportunity.

Our aim is to eliminate critical risks which may have long-term consequences as well as other potential risks that might occur and to determine opportunities throughout lifecycle of products procured, activities or services.

BGIS' approach to environmental management is underpinned by a mature and disciplined environmental culture that is embraced by its people and driven by what its leaders do and say. BGIS encourages its people to learn from each other's experiences and share best practice.

3. Environmental Management Plan

3.1 MMA Environmental Management Plan

An Environmental Management Plan (EMP) has been developed using the Template *Environmental Management Plan* and shall be utilised by the MMA contract.

The EMP shall define the environmental management practices to be used during the contract.

Market areas encompassed within the EMP under BGIS include:

Area	Description
Administration, Gatehouse and Customer Service/Operations areas	Administration Building Gatehouse 1 and 2
Trading Floor Complex	Fruit and Vegetable Trading Floor Fruit and Vegetable Buyers walk Flower Market
Recycling Transfer Station	Recycling (waste) management components
Roads, car parks and landscaping	All roadways and car parks throughout the site
Warehousing 5, 6 & 7	Warehousing managed by the MMA
Equipment and Forklift Services (EFS) storage facilities 1-3	Management of triple interceptor for oil/hydrocarbon waste discharge
Cafes	Management of grease trap for oil/grease waste discharge
Sedimentation/Frog pond	Excessive rainwater catchment pond
Future development areas	Pad 10
LPG station North	LPG refuelling station
Water treatment plant	Rainwater recycling plant
Central plant	Ammonia/glycol refrigeration plant

Market areas and works excluded from this EMP scope are managed by a third-party entity under arrangement with the MMA:

- Warehousing 1 to 4, 8 & 9
- Diesel station
- LPG station South, and
- MMA Project Works undertaken by MMA and their contractors.

3.2 Environmental Sustainability Design Rating

The Administration Building has been designed to achieve the 5 Star Green Star Office v3 created by the Green Building Council of Australia.

The Fruit and Vegetable Market and National Flower Centre were designed to meet the 4 Star Green Star Industrial PILOT ratings.

Extensive consultation, observation and international benchmarking have delivered a market that is modern and efficient. The design of the market also included the following environmental design elements:

- Waste Transfer Station recycling provisions for:
  - Organic Waste
  - Polystyrene
  - Cardboard
  - Plastics, and
  - Wood.

- Rainwater Harvesting - Rainwater is collected from the roof area of both the market buildings and treated/filtered for use on-site for toilet flushing, irrigation and wash down hoses, reducing the demand for potable water

- Stormwater runoff is treated on-site in the constructed passive wetlands - The Melbourne Markets site produces a quality of water that can be used for irrigation off-site

- A mixture of native habit and fauna corridors

- Both market buildings are naturally ventilated with outside air drawn from low-level openings (louvres / normally open roller doors) and warm stale air expelled via a high-level roof opening, and

- Domestic hot water for the amenities areas is provided by solar hot water systems.

3.3 Statutory and Legislative Requirements

The EMP has been developed to comply with the relevant statutory and legislative requirements. The following documents were referenced in the development of this EMP:

Delivery of the services shall comply with all other relevant Victorian legislation and regulations, including the following.

Required Legislation (as applicable):
- Environment Protection Act 2017 (Vic)
- Environment Protection Regulations 2021 (Vic)
- Environment Reference Standard
- Climate Change Act 2017 (Vic)
- Planning and Environment Act 1987 (Vic)
- Wildlife Act 1975 (Vic)
- Water Act 1989 (Vic)
- National Environment Protection Council (Victoria) Act 1995 (Vic)

Relevant guidelines / policies (as applicable and as amended from time to time):
- Coronavirus (COVID-19): Disposing of PPE at home and in the workplace, EPA Victoria, Publication 1898, August 2020
- Industry guidance: Supporting you to comply with the general environmental duty, EPA Victoria, Publication 1741.1, October 2020

- Reasonably practicable, EPA Victoria, Publication 1856, September 2020
- Summary of waste framework, EPA Victoria, Publication 1756.2, May 2021
- Guide to classifying industrial waste, EPA Victoria, Publication 1968.1, August 2021
- Waste and recycling – guide to preventing harm to people and the environment, EPA Victoria, Publication 1825.1, July 2021
- Waste classification and assessment protocol, EPA Victoria, Publication 1827.2, March 2021
- Waste disposal categories - characteristics and thresholds, Publication 1828.2, March 2021
- Waste code transition to Environment Protection Regulations 2021, EPA Victoria, Publication 1967.2, June 2021
- Waste codes, EPA Victoria, Publication IWRG822.4, June 2021
- How to establish lawful place, Publication 1946.1, June 2021
- Managing industrial waste – your duties as a waste producer, EPA Victoria, Publication 1990.1, July 2021
- Fire prevention: combustible recyclable an waste materials, EPA Victoria, Publication 1759.1, July 2021
- Notifiable contamination guideline – Duty to notify of contaminated land, EPA Victoria, Publication 2008.1, July 2021
- Contaminated land policy, EPA Victoria, Publication 1915, February 2021
- Assessing and controlling contaminated land risks: A guide to meeting the duty to manage for those in management or control of land, EPA Victoria, Publication 1977, June 2021
- Noise limit and assessment protocol or the control of noise from commercial, industrial and trade premises and entertainment venues, EPA Victoria, Publication 1826, May 2021
- Guideline for assessing and minimising air pollution, EPA Victoria, Publication 1961, Feb 2022
- Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues, EPA Victoria, Publication 1826, May 2021
- Responding to harm caused by pollution, EPA Victoria, Publication 1991, June 2021
- Compliance and enforcement policy, EPA Victoria, Publication 1798.2, June 2021
- Responding to harm caused by pollution, Publication 1991, June 2021
- City of Whittlesea Planning Scheme, November 2021 and relevant planning approvals (including any planning permits relating to the Market areas).

3.4 Objectives of the Environmental Management Plan (EMP)

The objectives of this EMP include:

- Demonstrating that BGIS has identified the major potential environmental impacts associated with the works.
- Defining the measures that BGIS will implement in order to adequately address the environmental impacts identified.
- Assisting subcontractors to understand the planned environmental management measures and to provide them a document that can be audited against during the contract.

3.5 Regulation of Noise

- Noise is a form of pollution, and it includes vibration. As far as reasonably practicable, if the businesses' activities involves noise there is a positive duty to reduce the risks of harm posed by noise . Under the Environment Protection Regulations 2021 (Regulations) (Part 5.3, Division 3) noise from commercial, industrial and trade premises is "unreasonable" if it exceeds the noise limits. noise limits are determined using the Noise limit and assessment protocol for the control of noise from commercial, industrial and trade premises and entertainment venues (publication 1826) (Noise Protocol) to determine "unreasonable noise" which is then enforced under the Regulations.

- "Aggravated noise" is a serious offence and significant penalties apply. Noise from commercial, industrial and trade premises is aggravated noise if it exceeds the noise limit by a certain amount.

For commercial, industrial and trade premises the Regulations outline:

- how the noise level at noise sensitive areas is determined
- the levels at which noise is considered to be aggravated
- new noise sensitive areas where noise limits apply to childcare centres, kindergartens, primary and secondary schools, during their normal operating hours
- obligations for regional Victoria that were previously in guidance
- that noise from equipment used in an emergency is not assessed under the Regulations but may still be unreasonable under the EP Act. Testing of emergency equipment must continue to meet limits set in the Noise Protocol.

3.6 Waste Regulations

The Regulations contain detail on how the waste duties in the new EP Act are to be met by duty holders. They add to the new EP Act and convert these duties into actions to follow.

The aims of the waste Regulations are to:

- manage risks to human health and the environment
- support and encourage waste resource recovery and reuse.

The three steps for a duty holder to manage industrial waste under the EP Act and the Regulations are:

1. **Classification:** properly identify and classify it so that it is clear what duties apply to the waste and how to manage it.

2. **Transportation:** ensure any industrial waste is transported to a place authorised to receive it and provide sufficient information about the waste to the transporter. Priority waste has further containment and isolation requirements. Reportable priority waste has a transaction control, where each time the waste changes hands, EPA must be informed through the electronic waste tracker.

3. **Lawful place:** ensure that industrial waste only goes somewhere with lawful authority to receive it, through a permission, Declaration of Use, Determination, exemption or is otherwise authorised under Regulation 63 of the Regulations.

3.7 Waste types and duties

- There are three different waste types (refer Figure 2):
    - **Industrial waste** – waste arising from commercial, industrial, trade activities or from laboratories; or that has been prescribed as industrial waste. This includes municipal waste once it is received at a premises for any waste and resource recovery activity
    - **Priority waste** - any waste that is prescribed to be priority waste for the purposes of:
        - eliminating or reducing risks of harm to human health or the environment
        - ensuring the waste is managed in accordance with the duties (applicable to priority waste)
            - facilitating waste reduction, resource recovery and resource efficiency
- **Reportable priority waste** - a subset of priority waste that carries the highest levels of controls. It poses the greatest level of risk to human health and the environment.

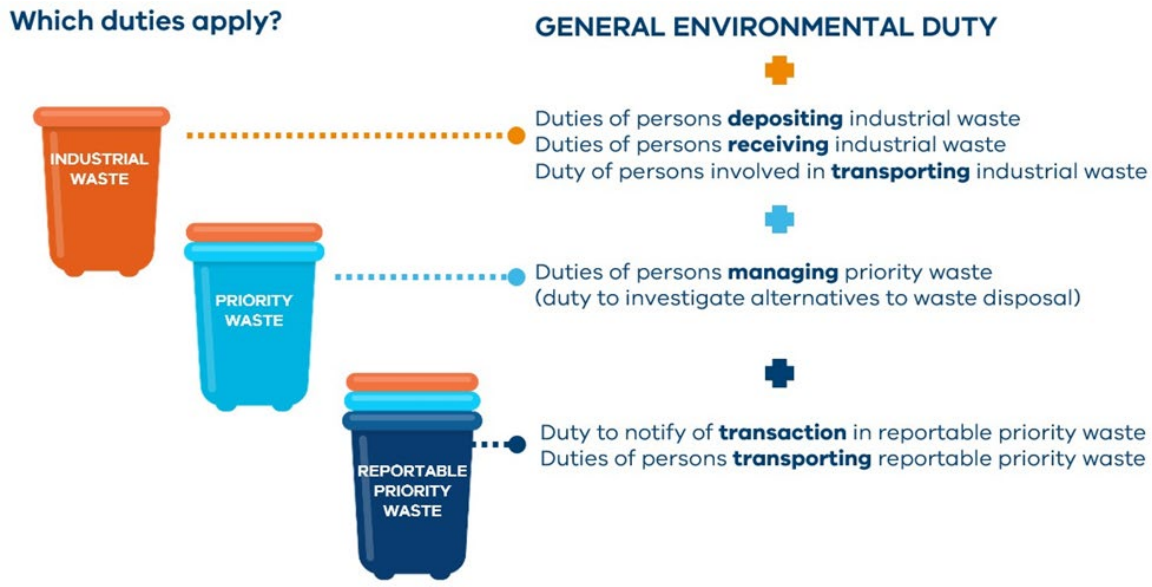

Figure 2: Which duties apply to different waste types

- Each waste type has duties and controls that apply to that type of waste. The duties and controls associated with these waste types accumulate. For example,

    Industrial Waste:
    - Duty of persons depositing industrial waste
        - Must send industrial waste to a lawful place and not illegally dump it.

- Duties of persons receiving industrial waste
  - Must only receive industrial waste if the place or premises is authorised to receive it.
- Duties of persons transporting industrial waste
  - Must take all reasonable steps to ensure that industrial waste is transported and received at a place or premises that is authorised to receive it. This includes:
    - Identifying and classifying the waste.
    - Providing sufficient information about the waste to the next person in the supply chain.
    - Verifying that the place or premises is authorised to receive the waste.

Priority waste:

- Duties of persons managing priority waste
- Must:
  - Classify the waste.
  - Contain the waste, to prevent escape or contamination.
  - Isolate the waste, to ensure resource recovery remains practicable.
  - Provide information regarding the waste to the next person in the supply chain so that they can meet their duties.
- Duty to investigate alternatives to waste disposal
  - Must take all reasonable steps to identify and assess alternatives to waste disposal.

Reportable Priority waste:

- Duty to notify of transaction in reportable priority waste
  - Must inform the EPA every time a reportable priority waste is exchanged, through EPA's electronic waste tracker.

3.8 Classifying Industrial Waste

All industrial waste needs to be classified to determine what waste type it is and how to manage it. This enables duty holders to meet their obligations with their waste duties in addition to their obligations under the GED to minimise the risk of harm to the environment and human health.

Classifying industrial waste involves:

1. Determining the relevant waste code or codes.
2. Determining if it is industrial waste, priority waste or reportable priority waste, and which waste duties apply.
3. For priority waste consigned for disposal to landfill or for soil that is priority waste, determining which priority waste category or disposal category applies.

The new waste classification framework pre-classifies most industrial wastes in Schedule 5 of the Regulations, specifying both the applicable waste code and the type of waste. This means that for most industrial waste, the waste code and type of waste can readily be determined using Schedule 5 of the Regulations.

Some wastes can be hazardous in certain circumstances, but not in others. For example, drilling muds may be hazardous when contaminated with hydraulic fluids. They are non-hazardous if the mud is not contaminated. There is a mirror code for these wastes.
A mirror code has two variations: hazardous or non-hazardous. A hazardous variant of a mirror code has additional controls and requirements to the non-hazardous variant.

3.9 Priority Waste Category

Priority waste is any waste, including municipal and industrial waste prescribed by the Regulations as priority waste. The purpose of designating waste as priority waste is to reduce the risk of harm, to manage the waste and maximise resource recovery and efficiency.

A person who manages or controls priority waste has a duty to manage the priority waste, including to classify the waste and to take all reasonable steps to ensure that priority waste is prevented from escaping, priority waste is isolated to ensure resource recovery remains practicable, and a person who collects the priority waste has been informed of the risks arising from the waste.

A person who has management or control of priority waste has a duty to take all reasonable steps to investigate alternatives to waste disposal for the waste. This includes:

- Considering the guidelines from the EPA in relation to alternatives.
- Considering other relevant guidelines or publications.
- Considering the state of technology.
- Consulting experts.

The relevant priority waste category must be identified for priority waste consigned for disposal to landfill or for soil that is priority waste. These are set out in Schedule 6 of the Regulations.

The priority waste categories are:

- Category A waste - prohibited from disposal to landfill.
- Category B waste.
- Category C waste
- Category D waste - for least hazardous soil only
- Soil containing asbestos only
- Packaged waste asbestos

Priority waste categories are generally determined based on the hazard level and potential for mismanagement, with higher waste levies applying to higher hazard priority waste. The exception is asbestos waste for which a lower waste levy rate applies because, although it is high hazard, there is no safe alternative to landfill disposal.

The priority waste categories are often referred to as the disposal category but, where the waste is soil, these categories apply to all offsite management options, not just disposal to landfill. This extends to onsite management options for soil sourced onsite from contaminated land.

Refer to Summary of waste framework, EPA Victoria, Publication 1756.2, May 2021 for further information.
Where BGIS and the subcontractors undertaking the Services on site have a duty to classify industrial waste in the market to meet waste duties under Part 6.4 (Duties relating to industrial waste) and 6.5 (Duties and controls relating to priority waste) of the Environment Protection Act 2017. Industrial waste generated in the Market is classified according to Schedule 5 of Regulations . If priority wastes are generated, they must be and are removed, transported, and disposed by EPA licensed subcontractor (refer to section 5.2).

Penalties for environmental offences

- The maximum penalty for body corporates ranges is approximately $3.2m for an aggravated breach of the GED. Individuals who commit aggravated offences can get a jail term of up to five years.

4. Environmental Planning

4.1 MMA Environmental Policy

The MMA's Environmental Policy provides an overarching policy underpinning their environmental management practices and articulate the framework for the effective delivery of those practices. The Environmental Policy has been developed to demonstrate MMAs commitment to responsible environmental management as well as increasing the awareness of the environmental impacts associated with the use of the Melbourne Market Land.

Key elements of the policy are communicated to BGIS site personnel and subcontractors in their respective site induction training programs.

The MMA's Environmental Policy is located on the MMA website.

4.2 Management Commitment

The MMA through its Board and Executive Team is committed to delivering a cleaner, greener Melbourne Market and to implementing environmental management procedures and practices that minimise the cost of operating the Melbourne Market and therefore the cost to Market Users conducting business at the Melbourne Market.

BGIS supports this commitment through the identification and implementation of environmental initiatives as well as demonstrating environmental stewardship through sustainable practices. These Services-related environmental initiatives are developed, shared and reviewed separately with MMA biannually via an Environmental Management Committee Meeting (or similar forum) for monitoring, review and tracking. It is proposed that Environmental Initiatives are agreed, communicated and tracked as an agenda item in the MMA Advisory Committee Meeting. BGIS will manage the Environmental Initiatives list.

4.3 Environmental Management Plan Objectives

Through the development of the Environmental Policy, MMA has identified the following environmental objectives:

- improve the environmental performance of the Melbourne Market operations and activities conducted on Market Land
- reducing the consumption of energy and water
- reducing waste and utilise recycling systems and processes, and
- reusing materials that have not reached the end of life
- reducing noise emission and emission to air, water, flora and fauna.

To support achieving these objects, BGIS is accountable to the MMA for:

- identifying management initiatives and conducting regular reviews of the EMP for MMA's approval
- providing relevant data information as required under the EMP and/or regulatory requirements necessary for MMA to meet its environmental reporting obligations
- implementing and continually reviewing (in consultation with the MMA Executive Team) a site-specific Environmental Management Plan, and
- identifying and implementing initiatives that meet this policy including preventing pollution, reduce resource consumption and encourage waste segregation with a goal of zero waste to landfill.

4.4 Environmental Aspects and Impacts

The potential environmental risks associated with the site operational activities are identified and assessed using the Environmental Aspects and Potential Impacts Analysis. These environmental hazards are assessed using the MMA's Risk Matrix to determine the risk of their impacts on the environment.

BGIS's Environmental Risk Register is maintained by BGIS's Risk and Compliance Manager and reviewed at least half-yearly, incorporating:

- Environmental Aspects and Potential Impacts risk register
- Risk Matrix
- Statutory Requirements
- Measurement and Monitoring Equipment Log.

4.5 Environmental Performance Review

Operational level environmental monitoring required under the EMP, namely air, noise and water quality measurement systems, are completed in accordance with planned maintenance, one-off or incident-related monitoring, and all relevant reporting provided to

MMA in accordance with the monthly reporting procedure. Monthly reporting is reviewed by the Contract Management Group and quarterly reporting (as required) is provided to the Relationship Management Group.
The MMA will systematically review the proposed corrective and preventative actions arising from environmental incidents and complaints, so the effectiveness of these actions is monitored. As part of this review, the MMA will consider the effectiveness of the emergency response to any incident and seek to address any issues determined or raised.

With consideration of the environmental performance from the previous period, the following environmental objectives and quantifiable targets have been developed by BGIS for the approval of the MMA. The following environmental targets consider objectives set out in the MMA's Environmental Policy aligned with this EMP's objectives:

• **MMA Environmental Policy Objective**	• **Environmental Target**	**Key Performance Indicators**
1: Reduce recyclable materials generated by Market Users going to landfill	**1:** Encourage waste segregation with a goal of zero recyclable waste to landfill	**1:** A measurement of recycling rate (85% KPI target)
2: Reduce resource consumption	**2:** Monitor resource usage to identify consumption trends	**2:** Energy and water consumption is monitored on site and identify consumption trends for MMA
3: Prevent illegal breaches	**3:** BGIS meets all its legislative and regulatory requirements for the Services at the Melbourne Market Site	**3:** 100% of BGIS's environmental reporting requirements are met Non-conformances relating to environmental issues are closed out within agreed timeframes.
4: Reuse materials that have not reached end of life	**4:** Reassess the various waste streams and review Waste Management Plan	**4:** The Waste Management Plan to be developed by the PTS
5: Improve the environmental performance of the Melbourne Market operations and activities conducted on the Market Land	**5:** Reassess the market operations and activities and recommend continuous improvement initiatives	**5:** Environment Management Plan delivered and reviewed as required

5. Leadership and Commitment

Account Manager Authorisation	Signature & Date
Mark Grundy	

5.1 Roles and Responsibilities

Environmental management during MMA activities is the responsibility of each and every member of the relevant BGIS team. Management and supervisory personnel lead environmental management by example, through provision of suitable resources to implement and monitor environmental measures, identify and correct any non-conforming conditions or behaviours and actively promote environmental awareness and individual environmental responsibility. All BGIS personnel are required to support implementation of environmental sustainability initiatives.

Each MMA contract team member is also responsible for reviewing all environmental documentation associated with the services they deliver. This includes maintaining familiarity with this EMP and may also cover the:

- MMA Environmental Policy
- BGIS Group Environmental Policy.

Figure 2 identifies the BGIS personnel responsible for the implementation of the EMS. The organisation chart will be updated as a change occurs.

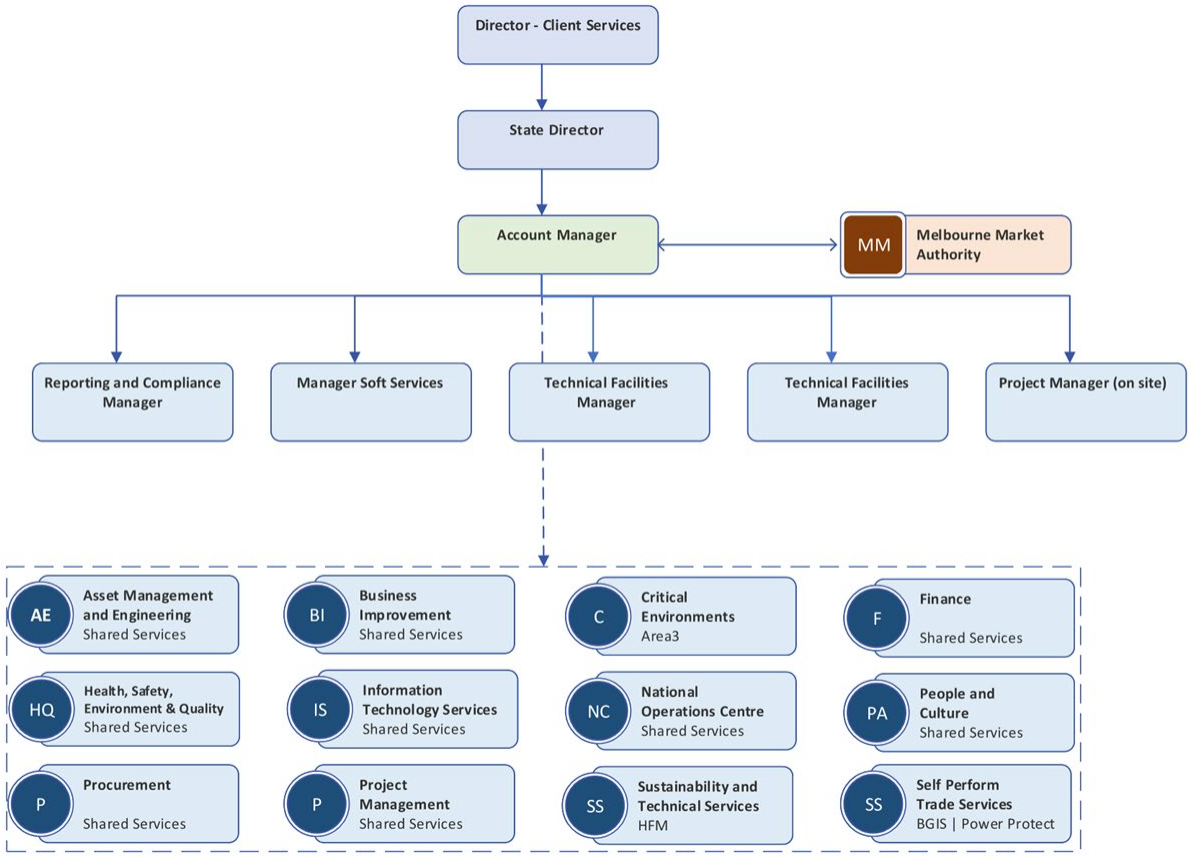

Figure 2: BGIS MMA Contract Organisational Chart

5.1.1 Responsibility for the Implementation of the EMP

BGIS and their subcontractors will be responsible for implementing the EMP.

Table 6: Environmental roles and responsibilities

Responsibility	Position
Overall contract OHS Responsibility and Accountability	Account Manager
Corporate OHS Support	HSEQ Team
Employee and vendor inductions, training and competency verification	Account Manager
Vendor site audits and onsite performance review	HSEQ Business Partnership Manager Account Manager
Performance review, including objectives and targets, and trend analysis	Account Manager

Table 7 identifies appropriate levels of resources, individual responsibility, and accountability for managing environmental matters across all roles within the organisation.

Table 7: Environmental Roles and Responsibilities Matrix

Roles and Responsibility	Executive Team	Sustainability Manager	State Directors/ Area Mgrs	HSEQ Manager	Account Manager	Project Manager	Facilities Manager	Facilities Team	Projects Team
Provide **resources** including personnel, time and finances to ensure compliance with environmental legislation and the EMP	✓	✓	✓		✓	✓			
Ensure operations identifies, **monitors and complies with current legislation** for environmental management	✓	✓	✓		✓	✓			
Ensure the **Management System**, risk assessment and procedures reflect the requirements of current environmental legislation, guidelines and standards		✓			✓				
Identify by way of subscription, all **environmental legislation**, standards, codes of practices and guidelines pertinent to corporate BGIS and MMA					✓				
Promote a positive workplace **environmental culture**	✓	✓	✓	✓	✓	✓	✓	✓	✓
Engage in **risk training** to identify, assess and determine appropriate controls for all potential risk and opportunity where required		✓		✓	✓	✓	✓	✓	✓
Establish realistic project specific measurable **targets.** Monitor and report					✓	✓	✓		
Have a working **knowledge** of the BGIS Environmental Management System	✓	✓	✓	✓	✓	✓	✓	✓	✓
Complete contract/project specific **environmental documents** utilising templates					✓	✓	✓		
Establish the environmental requirements for project **site establishment and planning** requirements					✓	✓	✓		
Establish a schedule of **environmental legislation**, communicate and monitor for change		✓			✓				
Establish records filing system and maintain **environmental records**		✓			✓	✓			
Establish and maintain **environmental registers including legislation, training and quantifiable targets** for corporate BGIS/ MMA					✓	✓			
Establish and organise the environmental component of the **induction program**		✓		✓	✓		✓		
Identify and assess **competency** of employees incl. any unforeseen workforce requirements. Undertake training needs analysis and facilitate any **training** requirements		✓			✓	✓	✓		

Roles and Responsibility	Executive Team	Sustainability Manager	State Directors/ Area Mgrs	HSEQ Manager	Account Manager	Project Manager	Facilities Manager	Facilities Team	Projects Team
Determine and assess requirements for **environmental monitoring** (i.e. noise, air and dust) and implement. Review results to determine compliance		✓		✓	✓	✓			
Assess subcontractor's ability to comply with the contract environmental requirements					✓	✓	✓		✓
Provide relevant **environmental documents** templates, EMPS, EWMS relevant parts of the site specific EMP		✓		✓					
Obtain **environmental documentation** from each vendor prior to commencing. Register and review adequacy and request changes prior to accessing the site					✓	✓	✓	✓	✓
Monitor subcontractor activities and report on performance against EWMS and EMP					✓	✓	✓	✓	✓
Conduct **inductions** for all persons attending site and maintain records					✓	✓	✓	✓	✓
Complete an **environmental aspects, impacts and risk assessment** for the MMA contract and update as required to reflect current site conditions					✓	✓	✓	✓	✓
Identify and maintain a register of all onsite **hazardous materials and dangerous goods**					✓	✓	✓	✓	✓
Obtain safety data sheets no greater than 5 years old and provide adequate hazardous substances and dangerous goods **storage facilities** onsite					✓	✓	✓	✓	✓
Conduct **environmental inspections** distribute for action, obtain sign-offs and close out					✓	✓	✓	✓	✓
Attend accounts/projects to **monitor and discuss environmental issues** with project management, supervisors and workers		✓	✓	✓	✓				
Monitor, resolve and prevent significant **environmental issues** and share lessons learnt	✓	✓	✓		✓				
Schedule and conduct environmental **audits** of vendors. Distribute report and monitor status					✓				
Conduct environmental **consultation and communication** on environmental matters where required	✓	✓	✓	✓	✓	✓	✓	✓	✓
Implement **emergency response procedures as outlined in the site Emergency Response Plan**						✓	✓		

Roles and Responsibility	Executive Team	Sustainability Manager	State Directors/ Area Mgrs	HSEQ Manager	Account Manager	Project Manager	Facilities Manager	Facilities Team	Projects Team
Record, report and investigate environmental **incidents**. Monitor corrective actions and distribute any lessons learnt		✓			✓	✓	✓		
Report and distribute **non-conformances** and implement corrective and preventative actions. Review effectiveness of corrective actions					✓	✓	✓		
Implement **environmental sub-plans** and procedures					✓	✓	✓	✓	✓
Prepare **monthly report** on the status of the environmental management system						✓	✓		
Review **environmental performance** including adequacy of resources	✓	✓	✓	✓	✓	✓	✓		
Obtain feedback for both internal/external training conducted and evaluate the effectiveness of the **training programs**		✓			✓				
Review environmental objectives and targets annually and provide clear direction of the Environmental management system for the next 12 months.		✓	✓	✓	✓				
Acquire and disseminate **environmental and related information** including alerts and lessons learnt		✓			✓				
Review procedures and forms resulting from any changes in legislation, regulation, standards, codes of practices and incidents					✓				
Attend **collaborative post project review meeting** to assess environmental performance, identify and document lessons learnt					✓	✓	✓	✓	

5.2 Melbourne Market Stakeholder Responsibilities

Stakeholder	• Responsibilities	Guides/References
All	• General Environmental Duty (**GED**) - minimise risks of harm to human health and the environment (from pollution or waste) so far as reasonably practicable when undertaking activities • Immediately report all environmental risks and hazards to a Market Relations Officer (MRO), BGISs Help Desk, Customer Service Office or Operations Centre. These concerns will be raised as a case in Salesforce.	General Environmental Duty (**GED**) Compliance and enforcement policy Industry guidance: Supporting you to comply with the general environmental duty, EPA Victoria, Publication 1741.1, October 2020

	• Any corrective/preventative actions identified shall be raised as a work request and managed through Salesforce. • Comply with all BGIS documented procedures, and • Ensure all works associated with the services are delivered in accordance with the compliance obligations and documented procedures. • **Note**: It doesn't matter whether an adverse impact to people and/or the environment has or has not occurred. The GED is breached whenever there is a risk of harm not being proportionally managed.	Reasonably practicable, EPA Victoria, Publication 1856, September 2020 Responding to harm caused by pollution, EPA Victoria, Publication 1991, June 2021
All persons engaging in an activity that causes a pollution incident	• If an activity causes a pollution incident, the person/s have the duty to notify EPA as soon as reasonably practicable after becoming aware of a pollution incident if it causes or threatens "material harm" where: • There is an adverse effect on human health or the environment • There is an adverse effect of an area of high conservation value or of special significance • The clean-up or management of the pollution or cost of restoration would cost $10,000 or more • The person/s also have the duty to take action to respond to harm caused by the incident by: • Paying for the clean-up of pollution • Restore an area to its original state, so far as is reasonably practicable.	Reporting a notifiable incident
BGIS Facilities/ Services Team / Market Operations Team	• Take all reasonable steps to identify and classify industrial waste • Take all reasonable steps to make sure that the waste will be transported to and received at a lawful place. For example, by engaging a reputable contractor to transport and dispose waste and seeking evidence from them that the waste is being transported to a place authorised to receive it. • Maintain site risk management registers and risk control plans including environmental risks in accordance with BGIS RMP;	Reporting a notifiable incident to EPA 1991: Responding to harm caused by pollution 1990.1: Managing industrial waste- Your duties as a waste producer

	• Ensure relevant BGIS team members are aware of and implement the risk control plans; • Monitor, review and report on risk registers and risk control plans; • Monitor and audit that all BGIS personnel and subcontractors are qualified/certified to undertake their task; • Monitor and audit works associated with the services are delivered in accordance with the compliance obligations and requirements documented in the BGIS procedures, and • Ensure all **'high'** and **'extreme'** level risks are reported immediately to BGIS's Contract Manager. • Ensure Market Operations Team upon notification of emergency spill respond immediately for spill containment management • Ensure Cleaning contractor upon notification of emergency spill respond immediately for spill clean-up rectification • Use waste tracker to track the delivery status of waste every time it changes hands	
Any PTS Subcontractor undertaking activities onsite i.e. builder Equipment and Forklift Services (EFS) storage facilities 1-3	• Maintain a high quality of housekeeping and ensure materials used are not left where they can be washed or blown away to become litter • Take all reasonable steps to make sure that the waste will be transported to and received at a lawful place. For example, by engaging a reputable contractor with appropriate authority to transport and dispose waste and seeking evidence from them that the waste is being transported to a place authorised to receive it. • If priority waste are generated, the duties below must be observed: • Duties of persons depositing industrial waste – send industrial waste to a place authorised to receive it • Duties of persons receiving industrial waste – receive industrial waste only if the place is authorised to receive it • Duties of persons transporting industrial waste – take reasonable steps to ensure waste is transported and received at a	EPA portal 1990.1: Managing industrial waste- Your duties as a waste producer

	place authorised to receive it (including identifying and classifying the waste, providing sufficient information to the next person in the supply chain, verifying the place is authorised to receive the waste) • Duties of persons managing priority waste – ensure the waste is classified, contained, isolated, provide information to the next person in the supply chain to help them meet their duties • Duties to investigate alternatives to waste disposal – take all reasonable steps to identify and assess alternatives to waste disposal for priority waste • Duties to notify of transaction for reportable priority waste – inform the EPA each time a reportable priority waste changes hands using the EPA's electronic waste tracker • Duties of persons transporting reportable priority waste – ensure reportable priority waste is not transported or caused or allowed to be transported other than in accordance with a permission	
PTS Subcontractor (General/Industrial Waste Removal)	• Ensure waste stations are managed as per agreement Meet duties relating to industrial waste: • Take all reasonable steps to identify and classify industrial waste • Provide sufficient information about your waste to the transporter. The transport contractor must contain your waste safely during transport. Some wastes have specific containment, isolation, vehicle permission and tracking requirements. • Verify that your industrial waste is transported to a lawful place	Industrial waste Guide to classifying industrial waste Lawful place
PTS Subcontractor (Priority Waste Removal)	• Routine emptying and cleaning of grease trap and triple interceptor using EPA accredited vacuum tankers/trucks • Ensure collected priority wastes are transported to a place authorised to receive it • Take all reasonable steps to identify and assess alternatives to waste disposal for priority waste • Ensure you have the relevant permission when transporting reportable priority waste.	Priority waste categories EPA portal Requirement to use Waste Tracker Producers, accredited consigners, transporters, drivers and receivers of reportable priority waste must use Waste Tracker to complete transactions. Changes to permissions (licences, permits and registrations) for most waste transporters and waste resource recovery

	• Notify EPA of transactions of transport and receipt of reportable priority wastes at a place	

5.3 Objectives, Targets and Programs

Environmental objectives and targets will be monitored, reviewed and assessed by the Account Manager and reported in the monthly report.

Actions will include:

- Setting targets
- Setting actions and time frames
- Reviewing all legal requirements
- Continual improvements; and
- Training.

Table 8 Environmental Objectives, Targets, Measure & Responsible Person

Objective	Target	Measure	Responsible Person
KPI 32 Waste streams	All projects and buildings works – reduction to landfill etc in accordance with MMA policies		Account Manager
Maximising opportunity to control risk by design, planning and re-planning	Completion of Environmental Awareness and Risk Management on-line training modules.	Environmental aspects and impacts register established for accounts and projects.	Account Manager
Focusing priority on control of critical risks	Continuously monitor and improve Environmental performance through a program of inspections.	Site inspections conducted on a monthly basis by the account projects team.	Account Manager
Growing a mature culture: innovative, reporting, learning and collaborative	No Environmental regulatory infringements or major pollution incidents.	Number of Environmental regulatory infringements and major pollution incidents.	Account Manager
Reduce the impact that the built environment contributes to climate change	Highlight strategies implemented to promote sustainability	Environmental Initiatives and improvements recorded in the *Account Innovation Register*.	Account Manager

5.4 Supplier/Vendor Roles and Responsibilities

BGIS encourages our suppliers (including vendors) to consider environmental issues when undertaking works anywhere within BGIS sites.

BGIS uses sustainable procurement practices while conducting business. Sustainable procurement can be defined as '…*a process whereby organisations meet their needs for*

goods, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organisation, but also to society and the economy, whilst minimising damage to the environment.'

Suppliers and vendors must ensure they comply with appropriate statutory requirements and have their own Environmental Management Plan (EMP), which reflects the environmental requirements of FSM202309, the Facilities Management Services Contract between MMA and BGIS. In addition, they must comply with the instructions given by BGIS representatives in the performance of work in which they are engaged.

Suppliers or vendors will be responsible for:

- reporting incidents, near misses and issues of non-compliance with EMP procedures to their supervisor or BGIS account representatives
- ensuring all work activities comply with environmental legislative requirements.

Suppliers and vendors are also required to identify any aspect or impact noted as well as any sustainability initiatives and report these to the to the contract management team.

Details on supplier and vendor selection and management processes are contained within the Procurement Plan and the Subcontracting and Subcontractor Management Plan.

5.5 Management Plan Review

The Account Manager shall ensure reviews of the Environmental Management Plan and all other Management Plans are completed at planned intervals, including an annual audit not later than 90 days before the start of each year, or when significant business changes are implemented. Any comments or feedback received from MMA's Authorised Representative will be taken into consideration during the process.

BGIS will continually improve the effectiveness of the EMP through the annual review and the use of audit results, inspection reports, corrective and preventative actions, and meetings.

Management Plan reviews aim to ensure continuing suitability, effectiveness and alignment with the strategic direction of the MMA contract whilst seeking opportunities to enhance and improve service delivery performance.

6. Induction, Training and Competency

6.1 Induction

BGIS has developed induction programs to ensure all workers and vendor personnel all are aware of their environmental and sustainability obligations.

All personnel directly or indirectly working on the MMA contract, including vendors, are required to complete the induction prior to starting work and will be provided with identification to show they have been inducted.

The induction includes the following environmental and sustainability aspects:

- Key issues relating to the contract and existing environmental such as ecological and heritage conservation areas
- Relevant environmental requirements, relevant conditions of planning approvals and environmental licences, and the obligations of all staff in relation to compliance with approvals and licences
- Environmental policy
- Site specific issues such as but not limited to:
  - Waste management and minimisation
  - Washing, refuelling and maintenance of vehicles, plant and equipment
  - Efficient use of plant, equipment and materials
  - Minimising potential environmental impacts including noise, air and water quality
  - Site-specific erosion and sedimentation controls, and use of spill kits to contain spills
  - Environmental emergency plans, and incident reporting procedures for environmental harm/incidents
  - Mandatory building disclosure
  - NABERS compliance obligation.

Records of all inductions will be maintained in Avetta.

6.2 Training and Competencies

BGIS is committed to achieving and maintaining high standards in training and development.

BGIS will implement systems in accordance with *BGIS Training Needs Analysis* to ensure workers have the required skills and training to competently perform required tasks.

BGIS will maintain a training program that identifies:

- The training required to meet statutory and legislative obligations
- The training required for each role or position to meet the required competencies
- A schedule of required refresher training.

Training programs will remain current and be reviewed at least annually or:

- When new or unforeseen workplace requirements are identified
- Following significant changes to the division's business operation
- Following a significant incident
- Following changes in legislation
- Following feedback from employees.

BGIS will review the training programs to ensure that the training has been effective.

Environmental training for BGIS Employees will be recorded on the contract BGIS EmployeeGUARD platform.

Copies of qualifications, licenses and competencies will be kept in the BGIS EmployeeGUARD platform.

Competencies relevant to the role of all BGIS vendors must be supplied at the time of induction and documented in Avetta. Internal BGIS planning for HSEQ competencies is also captured in the business online Learning Management System.

Vendor licences and competencies shall be sourced and verified per the Vendor Management Procedure and contract specific Subcontracting and Subcontractor Management Plan.

7. Incident and Emergency Management

7.1 Emergency Management

Emergency situations are to be managed through Procedure *Emergency Preparedness and Response*:

- An Emergency Management Plan details a single set of emergency contacts and procedures, consistent with MMA activities that can be scaled as appropriate for any incident or emergency.
- A Site Evacuation Diagram identifies the locations of emergency assembly points, fire exits, first aid kits and associated equipment, directional flow of pedestrian traffic and firefighting equipment
- A Business Continuity Plan provides guidance, details, responsibilities and lines of communication for effective emergency management.

Relevant details of the Emergency Management Plan will be provided to all personnel during the site induction, and information posted on notice boards.

Training requirement for emergency response should be identified during the environmental management plan annual review at least or during the regular management meeting. Once the training requirements are identified, these will be documented on the *Risk Register* as control measures and to be actioned and deciding on the actioned date.

7.2 Incidents and Reporting

For BGIS and the purpose of incident reporting, an environmental incident is defined as ‘an unplanned/ uncontrolled event that results in or has the potential to result in injury or harm to the health of people, damage or loss to property or the environment’. This may include, but not be limited to, events such as:

- Offsite emissions
- An environmental spill or contamination
- An unauthorised ground disturbance
- Recorded fauna death
- Near miss occurrences where the likelihood of environmental harm could have resulted or if the event was to occur again environmental harm is likely.

BGIS maintains a uniform system for the management and investigation of incidents which is outlined in Procedure *Incident Management*.

Incidents are reported and recorded in the BGIS incident management system via the SharePoint Incident Reporting Portal. They should also be reported to MMA so they can log an incident in their Salesforce system.

All incidents and near misses will be investigated by competent personnel and conducted in line with the requirements set out in the internal investigation procedures. Incident investigations will identify the root causes of the incident so appropriate remedial and preventative control measures can be identified and implemented.

Corrective actions resulting from incident investigations will be prioritised and carried out in accordance with defined priorities. The corrective action will be evaluated for its effectiveness and whether the initially identified deficiency has been corrected and prevented from recurring (see section 8.5 for further details).

7.2.1 Reporting

BGIS must immediately notify the MMA immediately notify the Authorised Representative and any relevant Contract Manager of:

- any non-compliance of the environmental management requirements of the contract
- a breach of any Statutory Requirement relating to the environment or any other incident that could have an adverse effect on the environment of any person at the Melbourne Market
- the receipt of any notice, order or communication received from any relevant Authority in connection with environment at the Melbourne Market.

Where required incidents will be reported to EPA.

If required by any Environmental Law to give any notice of an accident occurring during the performance, BGIS must provide MMA's Authorised Representative with an Interim Report within one (1) business day and a full report within 15 business days of any such accident.

Any full report provided must include, but not be limited to:

- results of investigations into its cause
- any recommendations or strategies for future prevention; and
- assessment of the accident, damage to the Environment or Incident against the incident management plan.

8. Implementation

8.1 Overview

An overview of the implementation approach BGIS will take to put into practice this Environmental Management System is seen in Figure 3.

Figure 3: Focused approach to building the EMP including Objectives and Targets

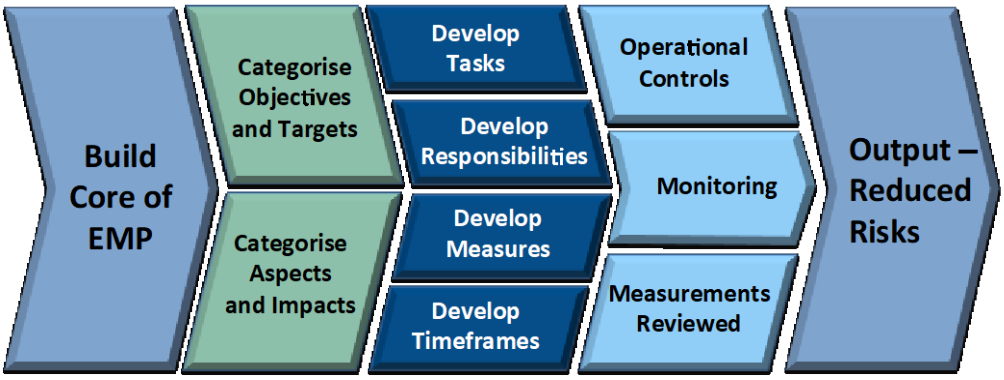

Table 9: Overview of Implementation Approach

Topic	Details
Build Core of EMP	While the entire EMP meets the requirements relative to a typical EMP and match ISO 14001:2015 requirements, which are central or core to the EMP, specific details are tailored to MMA requirements.
Categorise Objectives and Targets	One of the first steps BGIS has taken is to identify the Objectives and Targets. This will be periodically reviewed with interested parties to obtain feedback and input.
Categorise Aspects and Impacts	The Aspects and Impacts, identified in section 7.5, establish the environmental focus for the contract service delivery team (BGIS, subcontractors and vendors).
• **Develop Tasks and Responsibilities** • **Develop Measures and Timeframes**	Individuals and teams will develop tasks to complete their work activities. These are evaluated as they relate to responsibilities relative to the environment and the EMP. Measurements and timeframes are established.
• **Operational Controls** • **Monitoring** • **Measurements Reviewed**	Once operational controls are established monitoring will occur over the course of the contract. Should incidents occur, analysis will take place on the cause and corrective actions. Measurements are routinely reviewed to ensure appropriate Objectives, Targets, Aspects and Impacts are in place.
Output – Reduced Risks	The implementation of this EMP will result in reduced environmental risks for BGIS and MMA. Periodic reviews of the risks ensure the focus remains on elimination, mitigation and management measures.

8.2 Communication

In order to achieve a robust interface process during the work activities, including the environmental processes, BGIS will ensure meaningful and effective communication processes are established and maintained.

Communication on EMP matters will occur through the mechanisms outlined in Table 10.

Table 10: Communications

Event	Frequency Requirement	Participants	Record/Evidence
BGIS on-line induction	On engagement of workers, suppliers or vendors, prior to commencement of any work	All personnel	Contractor Learning Management System Compliance reports
Site specific induction	Prior to any work commencing	All personnel carrying out work activities on site	Record of induction
OHS/E Management Review	Bi-monthly	Contract/ projects/ department team	Minutes of meeting
Toolbox meetings	During the introduction of a new process or when discussing environmental issues/ topics	Contract/ projects team	Toolbox meeting record
Vendor meetings	Monthly or as required	Contract/ projects team	Minutes of meeting
MMA Client meetings	Monthly or as required	MMA and Account Manager	Minutes of meeting
Site inspection actions	Weekly	Contract/ projects team and vendors	Site inspection record
Environmental Incident Alerts	BGIS Account Manager notified within 1 hour of incident reported	BGIS Call Centre Account Manager	Email
	As required – immediate notification	Account Manager MMA Authorised Representative and any relevant Contract Manager	Email - Environmental Interim Report (within 1 Business Day) and a full report (within 15 Business Days)
External enquiries and Complaints	As required	As required	Register
External communication	Annually	Executive Team	Annual reports communicated via the BGIS website
External consultation with regulatory and local governmental authorities	As required	MMA Authorised representative Account Manager Other resources as appropriate for the issue	Minutes of meeting
Non-compliance with contract requirements	As required – immediate notification	Account Manager MMA Authorised Representative and any relevant Contract Manager	Email

Event	Frequency Requirement	Participants	Record/Evidence
Receipt of notice, order or communication from any relevant Authority in connection with environment at the Melbourne Market	As required – immediate notification	Account Manager MMA Authorised Representative and any relevant Contract Manager	Email

8.2.1 Internal Communication

The BGIS Contract Manager uses the induction training programs and regular site meetings to provide BGIS personnel and subcontractors with an opportunity to communicate environmental requirements and to raise issues or suggested improvements.

The MMA actively communicates with Market Users regarding environmental initiatives through various mediums and uses the customer feedback and improvement reporting system to provide an opportunity for environmental feedback from Market Users.

8.2.2 External

The Account Manager will communicate with MMA to identify, discuss and proactively manage environment issues, risks and opportunities.

Throughout the contract key personnel will communicate and consult with MMA. Levels of stakeholder engagement may include:

- consulting, collaborating and addressing environmental hazards and/or concerns with all relevant personnel
- engaging in proactive, timely and open communications in a variety of formats to develop knowledge and awareness of environmental initiatives
- establishing forums to disseminate information and obtain feedback.

The Account Manager will work with MMA to develop environmental communication and a communication strategy. This may include communication from BGIS to the Melbourne Market or MMA led communications. The Account Manager may direct specialist resources to undertake this activity on their behalf.

BGIS acknowledges that it is important to maintain two-way communication with residents regarding any potential environmental concerns associated with the activities occurring within the site. In particular, the management of noise complaints will be a key activity due to the potentially noisy activities at the Market site.

The MMA actively communicates with residents, which is detailed in the Environmental Management Communications Strategy. This strategy aims to build trust and cooperative relationships with the local community by resolving any potential issues quickly and effectively.

All complaints received via the BGIS Help Desk are managed in accordance with relevant BGIS procedures.

8.3 Consultation

To ensure effective consultation occurs at all levels throughout the life of the contract, employees, subcontractors and vendors will be consulted with regard to aspects and impacts that have the potential to impact the environment. Consultation on environmental matters will occur through the mechanisms outlined in Table 11. This table provides events and nexus points for typical interfaces.

Table 11 Consultation interface points

Event	Frequency	Participants	Record
On-line environmental awareness training	Prior to commencing work	All personnel	On-line compliance reports
On-line risk management training	Prior to commencing work	All personnel	On-line compliance reports
Toolbox meetings	As required	Contract/ projects team and vendors	Toolbox meeting record
Vendor meetings	Monthly	Contract/ projects team and vendors	Minutes of meeting
Account/ project team meetings	Monthly	Contract/ projects team	Minutes of meeting
MMA Client Meetings	Monthly	Account/ projects team and MMA	Minutes of meeting

8.4 Risk Management

BGIS' risk management approach and methodology are documented within the Risk Management and Resilience Plan. Operating within and under this framework, this EMS defines the methodology to identify and controls to use for the environmental risks associated with the delivery of BGIS services to MMA.

From an environmental perspective, BGIS seeks to minimise risks that could lead to:

- Death or injury to persons
- Interruption to operations
- Security compromises
- Loss or injury to the environment, including the physical factors of the surroundings of human beings including the land, waters, atmosphere, climate, sound, odours and tastes
- Damage to the biological factors of animals and plants
- Adverse publicity and/or impact on the local community
- Litigation arising from any of the above incidents.

BGIS and its subcontractors and vendors will undertake risk management processes in accordance with the Procedure *WHS Risk Management*.

Developing a site-specific risk assessment is an underlying activity required under this EMP. Identification of the risk must be site specific for appropriate management of those environmental risks.

8.5 Environmental Aspects and Impacts

Specific activities required in the delivery of the services pose some level of risk to the environment. These risks may derive from the type of activity and the specific environmental conditions at the MMA site. These risks need to be identified, assessed and controlled relevant to an acceptable level.

Table 12 provides and extract from the Risk Register. It sets out the services provided to MMA and identifies potential risks (impacts) these could pose, considering the specific environmental aspect and sensitivity of the surrounding environment.

The *Risk Register* will be updated during the contract transition period and reviewed as required or annually as a minimum. Formal establishment of key environmental aspects and impacts is accomplished in accordance with the WHS Risk Management.

The assessment matrix is based on BGIS' risk management approach. The matrix provides a pathway to rank environmental aspects and impacts for any area onsite. Any medium to high risks that exist are documented and, where necessary, strategies are implemented to mitigate them.

The Account Manager is responsible for ensuring the Environmental Aspects and Impacts Assessment Register is current and up to date.

The *Risk Register* is updated as risks are identified and reviewed annually as a minimum, or as required.

Table 12 Aspects and Impacts

Activity or Service *(e.g. Cleaning, Waste maintenance)*	**Environmental Aspects** *(e.g. Noise/ dust source, chemicals, waste, resource use)*	**Possible Environmental Impact** *(e.g. Contaminated waterways, noisy/dusty neighbourhood, release of greenhouse gases)*	**Possible Control Measures Required**
Building Engineering Services)	• Use of chemicals (e.g. AFFF)	• Water contamination • Soil contamination	• Provide appropriate bunding around chemical storage tanks • Incorporate alarm systems so as to provide early warning of chemical release. • Ensure SDS are stored with chemicals (as well as with the Contract Administrator and appropriate Services Manager)
Cleaning	• The use of cleaning chemicals	• Air pollution • Build up of indoor air pollutants (such as Volatile Organic Compounds or formaldehyde) • Soil contamination • Water contamination	• Ensure sufficient ventilation during use of chemical cleaners • SDS sheets to be provided to the Soft Services Facilities Manager for each chemical prior to being used on site • Contractors are required to use less toxic and/or biodegradable cleaning products where available • The BGIS team should minimise quantities of cleaning chemicals stored on site and ensure chemicals are stored in the recommended manner that reduces the risk of contamination of soil or water
Carpet maintenance	• Chemical use (e.g. Adhesives and Solvents	• Soil contamination • Water contamination • Air pollution	• SDS sheets to be provided to the Contract Administrator and appropriate Services Manager • Store and dispose of chemicals in a manner that reduces the risk of causing environmental contamination
Carpet replacement	• Off – gassing	• Air pollution	• Use carpeting options (including adhesives) that eliminate or reduce the release of Volatile Organic Compounds
Carpet replacement	• Waste generation (e.g. off-cuts or discarded carpet)	• Waste to landfill	• Choose options that use recycled content in either the rubber backing or the PET polyester-face fibre • Buy carpet with higher recycled content
Energy Use	• Use of electricity, gas or alternative energy sources	• Generation of greenhouse gases	• BGIS to seek methods to minimise energy use • Monitor/ audit energy use to ensure equipment cycles are occurring correctly • Turn lights off in plant rooms, offices etc. when not in use • Install energy efficient/saving equipment • Utilise alternative energy sources (e.g. solar or wind)
Fire Protection (Building	• Potential for pipe/hose burst or leak	• Water contamination • Waste of natural resources	• Ensure SWMS are developed by and reviewed • Implement maintenance program so as to reduce incidence of leaks/ releases due to false alarms.

Activity or Service *(e.g. Cleaning, Waste maintenance)*	Environmental Aspects *(e.g. Noise/ dust source, chemicals, waste, resource use)*	Possible Environmental Impact *(e.g. Contaminated waterways, noisy/dusty neighbourhood, release of greenhouse gases)*	Possible Control Measures Required
Engineering Services)		• Loss of heritage integrity and value	• Incorporate alarm systems so as to provide early warning of a problem. • Provide bunding and/or drainage system to minimise damage due to accidental water release
Future Project Work	• To be determined from scope of works	• Potentially all environmental impacts dependent upon the scope of works	• To be identified during scope of works
General building maintenance	• Noise generation	• Noise pollution	• Restrict work to agreed times • Instigate permit system to manage activities generating high noise levels • Implement process for logging and responding to noise complaints
General building maintenance	• Waste generation	• Waste to landfill	• Minimise the volume of waste generated through strategic choice of material size and the maximisation of reuse and recycling strategies • Recycle where possible.
Grounds and Gardens Maintenance Services	• Use of chemicals, soil disturbance, waste generation	• Soil contamination/ degradation • Water contamination/ degradation • Noise pollution • Waste to landfill • Air pollution • Encouragement of pest or weed species • Disturbance or death of native plants/ animals	• Manage the landscaped area so as to prevent soil erosion or runoff of material into waterways • Minimise use of chemicals (herbicides and pesticides), where possible utilise non chemical weed and pest control • Prior to commencing work consider possible impacts on native plants and animals and the risk of spreading weeds or plant pathogens. • Utilise green waste on site where feasible or if not dispose of appropriately at a facility that receives and processes green waste • Restrict noisy operations to agreed times and utilise less noisy equipment where possible • Utilise environmentally friendly chemical controls or management techniques • Avoid installing paved areas; to ensure natural water paths are not disrupted and infiltration occurs into the soil
Mechanical Services	• Use of fossil fuels	• Air pollution • Soil contamination • Water contamination/ degradation	• Spill kits on site • Report on disposal of oil after oil change • Regular service schedule to reduce chance of filter build up and ineffective use of systems • Ensure all oil and lubricants are stored in a bunded tray

Activity or Service *(e.g. Cleaning, Waste maintenance)*	Environmental Aspects *(e.g. Noise/ dust source, chemicals, waste, resource use)*	Possible Environmental Impact *(e.g. Contaminated waterways, noisy/dusty neighbourhood, release of greenhouse gases)*	Possible Control Measures Required
Mechanical Services	• Use of chemicals including lubricants, corrosion inhibitors and fungicides	• Air pollution • Soil contamination • Water contamination/ degradation	• Encourage natural ventilation by opening doors • SDS sheets to be provided to the Contract Administrator and appropriate Services Manager • Ensure all oil and lubricants are stored in a bunded tray • Used chemicals to be disposed of in a manner that prevents soil or water contamination
Office Management	• Office waste	• Waste to landfill • Waste of natural resources	• Recycle office waste, cans, bottles, paper and cardboard. • Implement green procurement initiatives • Implement resource saving initiatives ie: print double sided, purchase cups, utensils etc.
Organic Waste	• Generation of food services waste	• Waste to landfill • Discharge to sanitary sewage • Storage of waste organics causing putrescible waste • Odours from decaying waste	• Onsite composting is done (where practical) • If putrescible waste is stored on site, must be stored in vermin protected waste containers and preferably in a cool area to lower the temperature and prevent rapid decay • Order food with reduced amounts of packaging. • Recycle packaging of food supplies to reduce waste to landfill • Specify packaging that is biodegradable
Painting	• Chemical use (e.g. paints and solvents)	• Soil contamination • Water contamination • Air pollution	• Paints and solvents must be stored and disposed of in accordance with the *Liquid storage and handling guidelines* (publication 1698), *Dangerous Goods Act 1985*, Dangerous Goods (Storage and Handling) Regulations 2012, Code of Practice for the Storage and Handling of Dangerous Goods 2013 to reduce the risk of causing environmental contamination • SDS sheets to be provided to the Soft Service Facilities Manager
Painting	• Waste generation (paint and solvents)	• Waste to landfill • Soil contamination • Water contamination	• Minimise cross contamination between lead paint contaminated material and non-contaminated waste. • Store and dispose of paints and solvents in a manner that minimises the risk of causing soil contamination. Do not under any circumstances dispose of waste paint or solvents into soil • Store and dispose of paints and solvents in a manner that minimises the risk of causing water contamination. Do not under any circumstances dispose of waste paint or solvents into drains or waterways.

Activity or Service *(e.g. Cleaning, Waste maintenance)*	Environmental Aspects *(e.g. Noise/ dust source, chemicals, waste, resource use)*	Possible Environmental Impact *(e.g. Contaminated waterways, noisy/dusty neighbourhood, release of greenhouse gases)*	Possible Control Measures Required
Pest Control	• Chemical Use	• Air pollution • Soil contamination • Water contamination	• SDS sheets to be provided to the Soft Services Facilities Manager • Use of appropriately licensed/ accredited subcontractor • Use spot spraying in effected areas
Plumbing	• Management of wastewater including sewage and stormwater	• Water contamination • Soil contamination and soil degradation	• Ensure pumped out wastewater (e.g. septic tanks, contaminated wash water) are disposed of to an appropriate facility and obtain/record tipping dockets • Design stormwater management systems appropriately to prevent soil contamination or soil degradation and water contamination
Plumbing	• Inadequate function of backflow prevention devices	• Water contamination • Soil contamination	• Ensure regularity of service • Maintain certification records
Utility Management (through Building Engineering Maintenance Services) (water, gas, electricity)	• Use of water, gas, electricity	• Waste of natural resources	• BGIS to seek methods to minimise utility use • Monitor/ audit utility use to ensure wastage cycles and system leaks are detected • Switch lights off in plant rooms, offices etc. when not in use • Install energy and water efficient equipment and explore alternative management options • Ensure water leaks/ dripping taps etc. are rectified in a timely manner
Vehicle usage (BGIS and subcontractors)	• Use of chemicals • Use of water	• Water contamination • Waste of natural resources	• Cars to be cleaned at a registered/licensed agency which practices water recycling • Ensure car-pooling and organised travel are implemented
Waste management	• Waste generation	• Waste to landfill • Soil Contamination • Water contamination • Air pollution	• Use means of reducing waste generation such as on site separation of waste to minimise contamination and maximise recycling of waste • Consider options for reuse of waste material • Consider options for recycling of waste material
Waste management	• Hazardous materials • Dangerous goods (DG)	• Waste to landfill • Soil Contamination • Water contamination • Air pollution	• The disposal of wastes DGs (PIW - prescribed industrial wastes) is regulated by the Environment Protection (Industrial Waste Resource) Regulations 2009. These wastes must be disposed of at a place lawfully approved and licensed to accept the waste under the Environment Protection (Scheduled Premises) Regulations 2017. • The transportation of waste DGs must only be done using a vehicle holding a valid permit from EPA to transport PIW. The exceptions to this are: The load is destined for a site that is exempt from the transport permit and tracking system, or The net load being transported is less than 50 kilograms or litres, and there is no fee or reward.

Activity or Service *(e.g. Cleaning, Waste maintenance)*	Environmental Aspects *(e.g. Noise/ dust source, chemicals, waste, resource use)*	Possible Environmental Impact *(e.g. Contaminated waterways, noisy/dusty neighbourhood, release of greenhouse gases)*	Possible Control Measures Required
			• A waste transport certificate is also required to track the movement of PIW form 'cradle to grave'. Waste transport certificates enable information about the PIW waste to be passed on in the waste management chain. This includes the categorisation of the waste and who has had control of the waste.
Waste management (BGIS team)	• The generation of waste material	• Waste to landfill • Water contamination • Soil contamination	• Minimise the volume of waste generated through maximisation of reuse and recycling strategies • Identify stormwater pathways and take steps to prevent entry of waste cleaning chemicals into the water system • Identify potential pathways for soil contamination and take steps to prevent entry of waste cleaning chemicals into soil • Develop training and communication programs targeted at educating third-party service providers and market users about reuse, recycling and waste segregation to support MMA's goal of zero waste to landfill
Water Use	• Use of Water	• Waste of natural resources	• BGIS to seek methods to minimise water use • Utilise WELS rated fittings • Install on site water tanks or recycle water and utilise for irrigation • Install sprinkler systems that recycle test water • Monitor/ audit water use to ensure leaks are detected and rectified

8.5.1 Hazardous Materials/Chemicals and Spill Response

Hazardous materials/chemicals will be controlled so that they do not cause environmental harm through spills, leaks or inappropriate storage, handling and disposal.

Storage and handling chemicals will be undertaken in a manner that does not contaminate soil, watercourses and groundwater. The risk of spillage and leakage can be reduced by careful handling and attention to containment. Identified hazardous materials will be isolated and managed in accordance with legislative and BGIS requirements.

Hazardous waste substances will be transported by a licensed transporter and must be disposed of at a facility licensed to take that waste type. Evidence of appropriate transport and disposal, including quantities, should obtained and kept on file in accordance with local state environmental waste tracking requirements and reporting.

8.6 Incorporating Risk Management into the Environmental Process

Part of the assessment of the aspects and impacts is incorporating a process of risk evaluation for each of the aspects and impacts. The environmental management framework begins with individual steps which are put together as a total approach. The organisational context is first identified, as well as the processes and activities. From this the constraints and opportunities are examined along with the key environmental values. This establishes the objectives and targets, which are highlighted in section 4.2. Risk Management serves as a 'backdrop' to the aspects and impacts identified within the scope of BGIS services. Various groups are part of each of the steps. This process is seen in the following illustration.

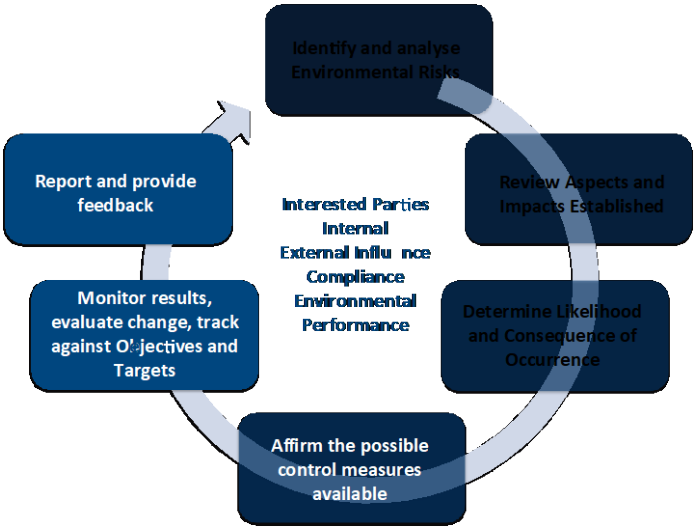

Figure 4 Using the environmental management framework to link risks and results

This process will be implemented through one or more of the following risk management activities as identified in Table 13.

Table 13: Risk Management Activities

Risk Management Activity	Frequency Requirement	Responsibility
Completion of an Environmental Aspects and Impacts Assessment Register to identify aspects and impacts (see Table 12)	Commencement and reviewed annually	BGIS
Completion of Risk Workshops to evaluate, register and incorporate risk (i.e. likelihood and consequence)	Commencement and reviewed annually and as required	BGIS
Including of the Aspects and Impacts into the Environmental Management Plan (EMP) and sub plans	Prior to the commencement and as required	BGIS and additional Service line vendors
Development of Safe Work Method Statement (SWMS) for activities with high-risk potential and often may have an impact on the environment	Per activity conducted	BGIS and selected Service line vendors
Environmental site inspections of sites/ projects	Weekly	BGIS
Implementation of the EMP (and the sub plans which are included)	Throughout the contract term	BGIS, subcontractors and all vendors

The assessment matrix shown in Figure 5 is based on BGIS' risk management approach – *Enterprise Risk Management Policy and Framework*.

Likelihood /Frequency	Impact				
	Negligible (1)	Minor (2)	Moderate (3)	Major (4)	Extreme (5)
Almost Certain (5)	Medium	Medium	High	Extreme	Extreme
Likely (4)	Low	Medium	High	High	Extreme
Possible (3)	Low	Medium	Medium	High	High
Unlikely (2)	Low	Low	Medium	Medium	Medium
Very Unlikely (1)	Low	Low	Low	Low	Medium

Figure 5 Risk matrix for evaluation of environmental risk

Risks are evaluated as to likelihood and consequence. This provides a relative evaluation of the risk level. Control measures are then established with the objective to reduce the impact to as low as possible. To do this a Hierarchy of Control as seen Figure 6 in is followed.

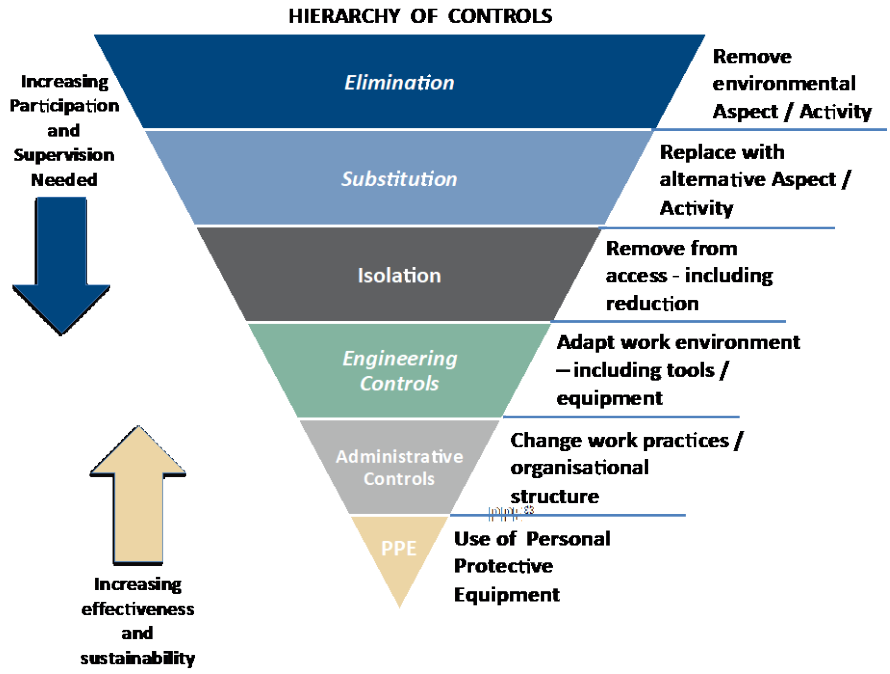

Figure 6 Hierarchy of Control for environmental controls

8.7 Environmental Controls

BGIS also has a number of Environmental Control Plans (ECP) available on the BGIS Document Hub. Examples of these include:

- Environmental Control Plan - Air Quality
- Environmental Control Plan - Dangerous Goods
- Environmental Control Plan - Flora and Fauna
- Environmental Control Plan - Heritage Management
- Environmental Control Plan - Introduction
- Environmental Control Plan - Noise and Vibration
- Environmental Control Plan - Soil Erosion
- Environmental Control Plan - Spill Management
- Environmental Control Plan - Stormwater Management
- Environmental Control Plan - Trenching and Excavation

9. Monitor and Measurement

9.1 Environmental Monitoring

Efficiencies will be sought in all areas. It is imperative to monitor usage (e.g. energy, water, waste, etc.) to ensure all offices and sites are performing to their design parameters and for benchmarking. This also ensures the Facility is being managed effectively and the environment protected.

Monitoring provides feedback on the usage, efficiency of the equipment and operational performance. Data is collected and analysed to:

- Provide baseline use data
- Compare building performance to design parameters
- Compare use performance to other like facilities
- Provide data for potentially sustainable reporting initiatives
- Provide baseline information for future improvement assessments
- Monitor price and potential savings during operational refinements
- Provide modelling data between various times
- Identify treatment opportunities to increase operational efficiency and enhance quality measurements.

The MMA contract team must determine the compliance obligation for control measures to be implemented and document this in *Risk Registers*.

Management system documents incorporate mechanisms to monitor and measure products and services. These can then be used to make historical comparisons and as reference to the actions from the Objectives, Targets and Action Plans Register.

Measurements, where applicable, will be recorded. Examples of monitoring and measuring include:

- Utilities use
- Water usage
- Electricity usage
- Air quality
- Noise levels
- Water quality
- Fuel use from business travel
- Waste management data; and
- Waste recycling data.

Meeting minutes, reporting and management reviews are also means to which the MMA contract's environmental performance can be measured.

9.2 Environmental Site Inspections

To ensure compliance with both contractual and regulatory requirements environmental inspections will be implemented in accordance with Procedure *WHS Risk Management*.

The outcomes and status of inspection activities will be recorded in inspection reports and issued to the persons delegated with responsibility for rectifying the impact. The site team will be responsible for tracking actions resulting from all inspections.

Site inspections are conducted by utilising mobile application technology and the outcomes are entered and the records saved in the mobile application on smartphone or tablets.

9.3 Environmental Auditing

An EMP auditing program, outlined in Table 14, has been established and implemented to assess compliance, identify trends, drive continual improvement and provide assurance that management processes are being effectively implemented and performance objectives are being met.

Audit procedures including the scope, frequency and methodology to be used as well as the responsibilities and requirements for conducting audits and reporting results will be in accordance with Procedure *Internal and External Audits*.

Table 14 EMS Audit Program

Type Of Audit	Audit By	Frequency	Purpose	Record
Internal BGIS audit	Audit Team	Annual	To confirm compliance against the EMP and EMS	Audit Report
Vendor EMS audits	Audit Team	As per schedule	To confirm compliance against the vendors EMP	Audit Report
Vendor prequalification audits (where required)	Procurement Team	As per schedule	To confirm compliance of the vendors EMP against the BGIS EMP requirements	Prequalification Audit Report
External surveillance audits	External accredited organisation	As per schedule	To confirm compliance of the EMS and ISO 14001	Audit Report
External VIC Government audit	External accredited organisation	3 yearly	To confirm compliance of the EMS to VIC Government	Audit Report

Audit results will be recorded and an action plan developed identifying the observations and corrective action required against each of the findings in the audit report. Details of any non-conformance reports will be issued in accordance with Procedure *Non-Conformance and Corrective Actions*.

A follow-up audit will be carried out, as deemed necessary by the auditor, in order to verify and record the implementation and effectiveness of the corrective action taken. Implementation and effectiveness of the corrective actions will be verified and recorded during follow-up.

Audits will be closed out in a timely manner.

9.4 Environmental Performance Reporting

Environmental performance will be reviewed and reported monthly to identify trends. Action plans will be developed to improve environmental performance as required.

Environmental and sustainability data to be collected and collated for the contract includes:

- Energy efficiency (i.e. consumption, data from energy saving initiatives)
- Water management (i.e. water consumption and water waste, including for the first flush filtration system, roof collection and the wetlands, and data from water reduction initiatives)
- Waste disposal (i.e. types of waste, volumes of waste, waste channels, rebates, analysis of local recycling service providers, and data from waste reduction strategies and initiatives)

The Account Manager will report environmental statistics and operational performance, ensuring all necessary data and information for MMA to meet its environmental reporting obligations is provided.

9.5 Corrective Actions

Deficiencies identified during audits, site inspections or observations of day-to-day operations will be generally recorded on the audit report or inspection report/checklist and actioned.

BGIS must also remain responsive to the Authorised Representative or relevant Contract Manager to ensure all reasonable steps are taken to address any environmental issue they identify.

When non-compliance is identified, BGIS will document the issue on the Non-Conformance Report in accordance with Procedure Non-Conformance and Corrective Actions on the on-line NCR system. It will identify the non-conformance and corrective actions. Where appropriate, the recipient and/or BGIS will also develop measures to prevent recurrence of the non-conformance. The report instigator will carry out a follow up review and closeout of the Non-Conformance Report within the specified time frame to verify completion of measures taken to rectify and to prevent recurrence of the Non-Conformance.

9.6 Continual Improvement

BGIS' quality assurance and continuous improvement solution is based on the ISO 9001 Quality Management System Standard. BGIS utilises its environment management system (EMS), supported by its quality management system, to drive corrective actions and ensure continual improvement in the management of environment and sustainability aspects.

The requirement to meet performance standards and internal key performance indicators is met by taking action through monthly reporting and regular informal and formal reviews.

A regular review of relevant laws, regulations and codes of practice is prescribed to ensure our monitoring, measurement and review activities are appropriate and relevant, and identify potential initiatives and innovations to bring to the MMA.

To keep abreast of ongoing improvement and innovation BGIS need to use the latest technology, data and practices. Strategies to be used include processes outlined in MMA-HSEQ-PROC-03, Strategic Planning and Continuous Improvement, such as the platforms to:

- Link and share ideas from all innovation efforts; and
- Encourage our employees and contracting partners to seek better ways to deliver services.

Reviews and processes should be targeted at MMA focus areas of energy efficiency, water efficiency, waste reduction or diversion from landfill and improvement to levels of recycling.

BGIS is contractually obligated to co-ordinate consulting advice to provide analysis on consumption trends and make recommendations to MMA on appropriate measures to improve environmental issues. This is to be managed by the Account Manager.

Industry specialists should be engaged to review existing operating practices and service providers to ensure the most current methods are being used and any costs and charges are delivering best value for money to MMA. Local recycling service providers will be an area of particular attention.

All recommendations (strategies, initiatives and innovations) will be documented and either raised directly with the MMA representative or included in the process improvement section of the monthly report, as determined by the nature of the issue and associated recommendation.

Recommendations approved by MMA must be introduced expeditiously and monitored for anticipated results.

We will follow the continual improvement cycle, sometimes called the PDCA cycle, which stands for Plan-Do-Check-Act. It is an iterative design and management method enables BGIS to ensure its processes are adequately resourced and managed and that opportunities for improvement are determined and acted on. For further information on the continual improvement process please refer to the Quality Assurance Plan.

10. Innovation

BGIS defines innovation as any idea, big or small, which when implemented provides added value and supports the BGIS Corporate Values of Integrity, Customer Satisfaction, Employee Engagement, Sustainability and Innovation.

Innovation may be measured in terms of:

- meeting customer needs
- meeting staff needs
- improving productivity
- saving money
- achieving greater sustainability
- decreasing waste
- improving quality
- improving safety
- increasing morale

Innovation ideas relative to environmental issues are added to *Account Innovation Register*. Innovations that are implemented at account level are shared across the wider business and stored on the BGIS BGIS Document Library.

11. Documented Information

Documented information required by the *Environmental Management Plan* and by ISO 9001:2015 shall be created, updated, controlled and retained in accordance with the Document Control Management, Document Record Management and SharePoint Folder Structure Guide and requirements captured within the *Quality Assurance Plan*.

Documented information retained as evidence of conformity shall be protected from unintended alterations.

APPENDIX 1 REFERENCE DOCUMENTS

MMA reference documents

Reference	Document name	Location
	Market Operating Rules	
Environmental Policy QMS-POL-04	MMA Environmental Policy	MMA Website (https://melbournemarkets.com.au/the-mma/policies-and-procedures/)

BGIS referenced documents

	Reference	Document name	Location
BGIS corporate documents		BGIS ANZ Risk Register	
	MMA-FM-POL-03	BGIS Group Code of Conduct	
		Document Control Management Procedure	
	MMA-FM-POL-02	BGIS Group Environmental Policy	
		Internal and External Audits Procedure	
		Enterprise Risk Management Policy and Framework	
		Integrated Management Plan	
Administration and Contract Management (environmental)		Account Innovation Register	
		Account Network Drive Folder Structure	
		Business Continuity Plan	
	MMA-BGIS-REG-01	Document & Record Register	
		Document Control Management	
	MMA-HSEQ-PROC-21	Document Development, Approval & Review Process	
		Document Management Procedure	
		Document Record Management	
	MMA-FM-PLAN-02	Environmental Management Plan	
		Environmental Aspects and Impacts Assessment Register	
		Internal and External Audits	
		Management Planning and Review	
		Objectives, Targets and Action Plans Register	
		SharePoint Folder Structure Guide	
	MMA-HSEQ-PROC-03	Strategic Planning and Continuous Improvement	
		Training Needs Analysis	

Emergency		Emergency Management Plan	
		Emergency Operation Procedure	
		Emergency Preparedness and Response Procedure	
		Site Evacuation Diagram	
Environmental control plans		Environmental Control Plan - Air Quality	BGIS Document Hub
		Environmental Control Plan - Dangerous Goods	BGIS Document Hub
		Environmental Control Plan - Flora and Fauna	BGIS Document Hub
		Environmental Control Plan - Heritage Management	BGIS Document Hub
		Environmental Control Plan - Introduction	BGIS Document Hub
		Environmental Control Plan - Noise and Vibration	BGIS Document Hub
		Environmental Control Plan - Soil Erosion	BGIS Document Hub
		Environmental Control Plan - Spill Management	BGIS Document Hub
		Environmental Control Plan - Stormwater Management	BGIS Document Hub
		Environmental Control Plan - Trenching and Excavation	BGIS Document Hub
Incident and hazard management		Incident Management Procedure	
		Non-Conformance and Corrective Actions Procedure	
Legal	SUS-T-016	Review of Environmental Legislation Changes	
Quality	MMA-HSEQ-PLAN-04	Quality Assurance Plan	
Risk		Risk Register	
		WHS Risk Management Procedure	
Subcontractors		Vendor Management Procedure	

EWMS and SDS

Reference	Document name	Location

APPENDIX 2 ISO CERTIFICATE OF CERTIFICATION

BGIS

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