NEOSMELT™

# Project NeoSmelt
# Construction Environmental Management Plan

## BlueScope Future Technologies Pty Ltd

**68929 | 173,956 (Rev 0)**

**30 April 2026**

BHP | BlueScope | MITSUI IRON ORE DEVELOPMENT | RioTinto | Woodside Energy

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# Abbreviations

| Term | Definition |
|---|---|
| ASS | Acid sulfate soils |
| CEMP | Construction Environmental Management Plan |
| DRI | Direct Reduced Iron |
| DRI-ESF | Direct Reduced Iron- Electric Smelting Furnace |
| DWER | Department of Water and Environmental Regulation |
| ECBZ | Eco-Cultural Buffer Zone |
| EP Act | *Environmental Protection Act* 1986 |
| EPA | Environmental Protection Authority |
| EPBC Act | *Environment Protection Biodiversity Conservation Act* 1999 |
| ERD | Environmental Review Document |
| ESA | Environmentally sensitive area |
| ESF | Electric Smelting Furnace |
| GHG | Greenhouse Gas |
| GKBAC | Gnaala Karla Booja Aboriginal Corporation |
| JV | Joint venture |
| mAHD | Metres above Australian Height Datum |
| mg/L | Milligrams per litre |
| MNES | Matters of National Environmental Significance |
| MP | Management Plan |
| MS | Ministerial Statement |
| PEC | Priority Ecological Community |
| RIZ | Rockingham Industrial Zone |
| SEA | Strategic Environment Assessment |
| TEC | Threatened Ecological Community |
| WA | Western Australia |
| WTC | Western Trade Coast |

# 1. Introduction

## 1.1 Background

BlueScope Future Technologies Pty Ltd (the Proponent), in joint venture (JV) partnership with BHP, Rio Tinto, Mitsui Iron Ore Development and Woodside (NeoSmelt), is working to transition towards a more sustainable steelmaking process. NeoSmelt has selected Direct Reduced Iron (DRI) technology coupled with an Electric Smelting Furnace (ESF), referred to as the DRI-ESF process that has the capacity to produce up to 49,380 tonnes of granulated iron per annum. The initiative will enable the utilisation of typically medium grade Pilbara iron ores (usually confined to more emission-intensive steelmaking methodology) and significantly reduce greenhouse gas (GHG) when compared to the incumbent Blast Furnace – Basic Oxygen Furnace (BF-BOF) process. The NeoSmelt Project (the Proposal), is a pilot-scale project to provide critical insights into low-emissions steel production and its potential to decarbonise steelmaking at a commercial scale.

The Proposal is to construct and operate a pilot DRI-ESF plant approximately 35 kilometres (km) south of Perth in the City of Rockingham (Figure 1-1). It comprises a Development Envelope of approximately 30.5 hectares (ha) located in the Western Trade Coast (WTC), within the Rockingham Industrial Zone (RIZ) Strategic Environment Assessment area (SEA). The Development Envelope is vacant industrial land to be leased from DevelopmentWA, the Western Australian (WA) Government's central land and development agency.

In 2004, areas of the RIZ with significant environmental features were referred by Landcorp (now Development WA) to the Environmental Protection Authority (EPA) as a SEA under Section 38 of the *Environmental Protection Act 1986* (EP Act). The EPA assessed the referral as a strategic proposal, and the RIZ SEA was approved by the Minister for the Environment (the Minister) in May 2011, via Ministerial Statement (MS) 863. Since the original publication of MS 863, five derived proposals for subdivision have been assessed by the EPA and approved by the Minister. Derived Proposal 5 was declared by the EPA on 3 April 2024, which encompasses the Development Envelope, and is valid for a five-year period following the declaration.

Due to the presence of MNES within the RIZ, the proposed RIZ SEA development was also referred to the then Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC), now Department of Climate Change, Energy, the Environment, and Water (DCCEEW), under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) in 2010. The RIZ was assessed as a 'Controlled Action' (EPBC 2010/5337) and approved in November 2011 with conditions. DevelopmentWA is the holder of the EPBC approval, and the Proposal will be required to be compliant with any relevant EPBC 2010/5337 conditions.

All development in the RIZ SEA must be undertaken in accordance with EPBC 2010/5377 and MS 863, including the approved Water Management Strategy, Construction Environmental Management Plan (CEMP) and Environmental Management Plan (EMP). This includes measures to retain native vegetation where possible.

## 1.2 Purpose

The Proposal has been referred to the EPA for project specific potential environmental impacts and is expected to receive a not-assessed decision. The Proponent has undertaken a self-assessment that concluded the Proposal is unlikely to have significant impacts on Matters of National Environmental Significance and, as such, a further referral under the EPBC Act is not required.

A CEMP has been prepared and approved for the RIZ SEA under MS 863. This CEMP has, therefore, been prepared to support the current assessment under the EP Act, supplementing the existing RIZ SEA CEMP, and consolidate all relevant commitments specific to the Proposal.

Management actions contained within this CEMP have been developed according to the SMART principle, in that they are:

- Specific;
- Measurable;
- Attainable;
- Relevant; and
- Timebound.

This CEMP incorporates the following environmental elements during the clearing and construction phases of the Proposal to ensure potential impacts to environmental values are appropriately managed using the mitigation hierarchy of avoid, minimise and rehabilitate. Specifically:

- Measures to avoid and mitigate impacts to conservation significant vegetation communities, and fauna including:
    - Hygiene requirements to prevent the introduction and/or spread of dieback (*Phytophthora sp*.);
    - Clearing and access control measures, such as demarcation of clearing and vegetation retention boundaries;
    - Erosion and sediment control;
    - Topsoil management;
    - Dust control;
    - Waste and fire management;
    - Pre-clearing fauna inspections;
- Performance indicators that measure the effectiveness of avoidance and mitigation measures;
- Contingency measures that will be undertaken if performance targets are not met;
- Monitoring and reporting; and
- Roles and responsibilities of personnel associated with implementing mitigation measures.

## 1.3 Scope

This CEMP will come into effect prior to the commencement of clearing, to allow for the installation of fencing and signage, and will be implemented throughout the construction phase. Project-specific construction activities include:

- Installation of boundary fence;
- Site clean-up;
- Vegetation topsoil clearing, storage and reuse with exception of the Eco-cultural Buffer Zone;
- Earthworks by excavation, importation of fill, movement of soil to fill depressions and low-lying areas;
- Site establishment, including preparation of laydown areas and other temporary facilities such as amenities and offices;
- Earthworks and establishment of foundations for buildings and other infrastructure;
- Construction of process equipment and utilities; and
- Provision of car parks.

### 1.3.1 Proposal construction schedule

The indicative construction schedule for the Proposal is provided in Table 1-1.

**Table 1-1: Indicative construction schedule**

| Construction stage | Activities | Estimated duration | Planned start |
|---|---|---|---|
| Site works commence | | Milestone | Q3 2027 |
| Clearing and site establishment | • Site requirements for commencement of broader works (Tuart trees fencing, fauna trapping, site TMP, laydown establishment)<br>• Vegetation removal within prescribed area<br>• Topsoil stockpiling | 5-months | Q3 2027 |
| Civils + Concrete (early works) | • Establishment of site facilities<br>• Underground service installation<br>• Concrete works | 12 Months | Q4 2027 |
| Plant construction | • Structural, Mechanical Equipment & Piping Package<br>• Electrical and Instrumentation Package | 20 Months | Q1 2028 |
| Plant commissioning | • ESF Commissioning<br>• DRP Commissioning | 12 months | Q1 2029 |
| 1st Hot Metal | | Milestone | Q4 2029 |
| Transition to Operations | | Milestone | Q1 2030 |

### 1.3.2 Construction work hours

Where practicable, construction work will be carried out during the hours set out in Table 1-2.

**Table 1-2: Hours of work**

| Activity | Day | Time |
|---|---|---|
| Construction | Monday – Friday | 07:00 – 18:00 |
| | Saturday | 08:00 – 13:00 |
| Commissioning | Monday-Sunday | 24 hours |

## 1.4 Health, safety, environment and community policy

The BlueScope Health, Safety, Environment and Community Policy (BSL-MS-P-01) establishes the principles and actions expected of all employees to fulfil BlueScope's commitment to people and the environment and is integral to business. The policy is supported by the BlueScope Steel Health, Safety and Environmental Standards and forms the foundation of BlueScope's Environmental Management System (EMS). The policy applies to all personnel working on BlueScope sites, including NeoSmelt.

It has been ratified by the BlueScope Steel Limited executive officers, and copies are on display in all Project and site offices. Copies are also freely available on request. This CEMP supports these targets and incorporates detail around the high-level action framework.

The Proposal will be undertaken in accordance with the BlueScope Steel HSEC Policy. Fundamental standards are defined by BlueScope Steel Limited policies; should any NeoSmelt policy be considered by the NeoSmelt Project Management Team to be of a higher standard than the equivalent BlueScope Steel Limited policy, the NeoSmelt Project policy will take precedence.

382600 382800 383000 383200 383400 383600 383800 384000 384200 384400 384600

6431400 6431200 6431000 6430800 6430600 6430400 6430200 6430000

KWINANA BEACH RD
ROCKINGHAM BEACH RD
CLAYMORE ST
OCEAN ST
OFFICE RD
JOHN BLACKBURN DR
PATTERSON RD
CHARLES ST
L9008
L109
WARD RD
ALLOY AV
ALUMINA RD
L503
ZIRCONIA DR

**Legend**

- Development Envelope
- Cadastral boundary (LGATE-002)
- Indicative Disturbance Footprint
- Eco-cultural Buffer Zone (ECBZ)
- Highway
- Minor road

JBS&G

| | |
|---|---|
| Job No: 6892903 | |
| Client: BlueScope Future Industries Pty Ltd | |
| Version: A | Date: 30-Apr-2026 |
| Drawn By: droberts | |
| Checked By: JBailes | |

Scale 1:6,000 at A3

0 100 200
metres

Coord. Sys. GDA2020 MGA Zone 50

**Project NeoSmelt, East Rockingham WA 6168**

**PROPOSAL LOCATION**

**FIGURE 1-1**

File Name: C:\Users\droberts\JBS&G Australia\DCS - Internal - V2\Projects\Bluescope\68929 Neosmelt\GIS\02_MapProjects\6892903_ProjectNeosmelt_s38_R02.aprx
Image Reference: www.nearmap.com© - Imagery Date: 21. January 2025.
Layout: 6892903_A3L_01_03_The Proposal

# 2. Community and stakeholder engagement

## 2.1 Stakeholders

The following broad categories of stakeholder relevant to the Proposal have been identified:

- Government:
  - WA State Government (Premier and Cabinet; departments like DEED, EPA);
  - Commonwealth Government (Ministers and agencies like ARENA, Industry, Science and Resources; Climate Change; Energy; Industry and Innovation);
  - Local government (City of Rockingham, City of Kwinana);
  - Regulators: Environmental regulators (EPA, DWER), safety and planning authorities.
- JV Partners: BlueScope, BHP, Rio Tinto, Mitsui Iron Ore Development and Woodside;
- Industry participants:
  - Foreign steelmakers and other industry participants who may be potential technology adopters (key target areas include Japan, South Korea, China and India);
  - Other industry in the WTC;
- Community: Residents (especially in Kwinana and Rockingham areas), Traditional Owners, community groups, local business owners, Kwinana Industry Council, unions and workforce; and
- Media and public: News outlets (print, TV, digital, trade press) and members of the public interested in industrial decarbonisation or local developments.

Policies and procedures are in place at BlueScope and will apply to the project to ensure compliance to the needs and expectations of interested parties is achieved through a range of activities including the effective management of legal obligations, reporting of environmental requirements and performance, stakeholder engagement, including communication with regulatory authorities where applicable, and employee/contractor engagement activities.

## 2.2 Stakeholder engagement

NeoSmelt has adopted a targeted, transparent and collaborative approach in all stakeholder interactions, as follows:

- Targeted: A strategic outreach program to consult with key stakeholders on a regular basis;
- Transparent: Communicate in an open and honest manner about the Proposal's goals, progress, and challenges (to build credibility) becoming a trusted source of information;
- Collaborative: The JV partners will collectively work together and where possible integrate stakeholder feedback, adjusting plans where practicable to address community and government input.

The stakeholder engagement strategy prepared for the Proposal outlines the following objectives;

1. Obtain regulatory approvals and social licence: Ensure the Proposal meets all regulatory requirements and is welcomed by the community.
2. Secure government funding and favourable policy settings (support enhancing commercial interests): Leverage and grow government investment and favourable policy backing.

3. Increase industry profile (to support proliferation objectives): Attend key industry events to raise the profile of the Proposal and cultivate interest from steel industry participants.
4. Maintain positive reputation and stakeholder trust: Keep stakeholders informed, supportive, with a positive sentiment toward the Proposal.

To ensure the objectives of the stakeholder engagement strategy are met, NeoSmelt has developed a suite of Stakeholder Engagement and Communications Plans that outline how it will build trust, manage social impacts and generate meaningful local benefits:

- Government Engagement Plan focused on JV Partner-level government engagement to support project funding requirements;
- A Community and Approvals Engagement Plan focused on Proposal-level stakeholder engagement; and
- A Media and Communications Plan focused on media engagement and public communications.

## 2.3 Complaints handling

BlueScope has an established complaints handling procedure, Contact Procedure for Complaints and Enquiries, that is applicable to the Proposal. The procedure addresses external complaints and enquiries as well as internal complaints, enquiries or self-reports, and defines the key contacts and actions to be taken following a complaint or enquiry.

Any complaints or enquiries that relate to the Proposal will be recorded in accordance with the established procedure (BlueScope HSEC Management System – MARS).

# 3. Environment management framework

## 3.1 Existing management system

BlueScope's Manufacturing Management System Manual (MM.BZ-MS-M-01-01) describes the organisation's established EMS that meets the requirements of and is certified to *ISO 14001:2015 Environmental management systems — Requirements with guidance for use.*

The EMS utilises BlueScope's Safety, Environment and Quality system (SEQ System), which is aligned with the 14 BlueScope Health, Safety and Environment (HSE) Standards and provides information related to managing risks, monitoring legal compliance, and maintaining the systems and documentation associated with health, safety, environment, and quality.

The SEQ System fits into the hierarchy of BlueScope's HSE documents as depicted in Plate 1. This CEMP fits into the Sub-Business Policies, Procedures and Guidelines section of the hierarchy.


**Plate 1: BlueScope's HSE Document Hierarchy**

## 3.2 Environmental Management Documents

BlueScope's existing environmental management procedures and systems apply to the Proposal activities. These include but are not limited to the procedures and systems listed in Table 3-1.

**Table 3-1: BlueScope Environmental Management Procedures and Systems**

| Document/system | Reference | Purpose |
|---|---|---|
| BlueScope's HSEC Policy | BSL-MS-P-01 | Identifies BlueScope's commitment to Health, Safety, Environment, and Community |
| ASP Manufacturing Management Systems Manual | MM.BZ-MS-M-01-01 | Describes at the highest level, those systems and processes used by BlueScope Australian Steel Products Manufacturing Businesses to effectively manage its operations |
| BlueScope's Safety, Environment, and Quality system | SEQ System | A management system for Safety, Environment and Quality that provides access to the SEQ procedures, tools and other resources. |
| HSE Risk Management | BSL-HSE-SD-03-01 | Sets the requirements and mechanisms for implementing the BlueScope Risk Management Standard within a Health, Safety and Environmental (HSE) context. |
| HSE Incident Management | BSL-HSE-SD-12-01 | Sets the requirements for incident management across BlueScope in order to meet the expectations of the BlueScope Health, Safety & Environment (HSE) Management System |
| Eco-Cultural buffer Zone Management Plan | Eco-Cultural buffer Zone Management Plan | Details management of the NeoSmelt Eco-Cultural buffer Zone |
| NeoSmelt Legal Obligations Register | NeoSmelt Legal Obligations Register | Outlines each of the Environment and Community legal obligations and commitments to be managed by the project. |

| Document/system | Reference | Purpose |
|---|---|---|
| Unexpected Finds Procedure | MA-ENV-03-11 | Provides guidance for the management of any unexpected finds including contamination and heritage items on BlueScope Steel licenced sites |
| Spill Response Guidelines | MA-ENV-11-02 | Outlines the necessary steps to be taken by Plant Departments to prepare for or respond to spills reported within their area. |
| Pollution Incident Response Management Plan for NSW Licenced Premises | MA-ENV-11-04 | Details the procedure for the notification of pollution incidents that result in or have the potential to cause harm to the environment in BlueScope licenced sites |
| Contact Procedure for Complaints and Enquiries | SP-ENV-07-03 | Define actions to be followed by the Environment Department personnel, External Affairs personnel in relation to handling complaints and enquiries |
| SAP Learning Centre | SAP Learning Centre | A repository of training and support materials to assist in the use of the BlueScope SAP systems and processes |
| Job Safety/ Environment Analyses | F.BZ-SEQ-S-03-02.02 | A tool used to identify task related hazards and controls based on the sequential job steps or unplanned changes to the job |
| Safe System of Work | BZ-OHS-S-03-01 | Processes that may include procedures, risk assessments, permits, inductions and training, that collectively form a system for undertaking work in a safe manner |
| Safe Work Method Statement | F.BZ-SEQ-S-09-10.21 | A tool used to identify task related hazards and controls based on the sequential job steps or unplanned changes to the job |

Specific Environment Management Documents relevant to the construction and commissioning phases of the Proposal are include the ECBZ MP, which is a commitment under the Proposal, and the RIZ CEMP, which was conditioned under MS 863, and will be considered throughout the construction phase of the Proposal.

# 4. Existing environment

## 4.1 Topography, geology and soils

The Proposal is located on the coastal fringe of the Swan Coastal Plain, within the Quindalup Dune system, comprising relic foredunes of calcareous sands. The topography of the Proposal area is relatively flat with a variation in elevation from 3.5 m to 4.5 m Australian Height Datum (mAHD; Worley 2025).

Three geological units underlie the Proposal:

1. The Superficial Formation:
    a. Safety Bay Sand – white, unlithified, calcareous fine- to medium-grained quartz sand and shell fragments originating from stable and mobile aeolian dunes (Davidson, 1995).
    b. Becher Sand/Becher Clay – grey, fine-grained, quartz and skeletal sand with lenses of silty calcareous clay rich in shell fragments and seagrass peat and mud layers.

c. Tamala Limestone – creamy, white to yellow aeolian calcarenite, varying from limestone to calcareous sand (fine to medium grained shell fragments), with minor siltstone and marl with various proportions of predominantly medium-grained quartz and sand (Davidson, 1995; Commander, 2003).

2. Rockingham Sand defined by brown to pale grey, silty and slightly feldspathic, medium to coarse-grained subangular quartz sand of shallow marine origin, occupying a deep eroded channel incised into the underlying Wanneroo member of the Leederville Formation.

3. The Leederville Formation comprising of:

   a. Wanneroo Member – interbedded sandstones, siltstones and shales; the siltstones are typically dark grey, micaceous and the sandstone interbeds are weakly consolidated pale grey and fine- to very-coarse-grained.

   b. Pinjar Member – grey and olive-green discontinuous interbedded sandstones, siltstones and shales of both marine and non-marine origin.

Acid sulfate soil (ASS) risk mapping for the Swan Coastal Plain (DWER, 2017) shows the Development Envelope as having no risk of ASS being present, which is consistent with assessments undertaken by Worley Consultants (2025).

## 4.2 Hydrology

The nearest surface water feature to the Proposal area is the non-perennial Lake Cooloongup, 3.5 km south of the Development Envelope. There are no surface water features within or that drain into the Development Envelope, which is relatively flat with sandy soils and shallow groundwater, conditions that favour infiltration rather than stormwater runoff.

The nearest mapped wetlands to the Development Envelope are unmade Conservation and Resource Enhance category wetlands, located approximately 0.6 km south and 1.5 km southeast of the Development Envelope, respectively. However, these features are hydrologically upgradient of the Development Envelope.

The Proposal is located in the Cockburn Groundwater Area and the Wellard Groundwater and Cockburn confined subareas. Groundwater flows towards Cockburn Sound, west of the Proposal. Groundwater in the area is alkaline with pH ranging from 8.30 to 8.77, and predominately fresh with salinity mapped as 500-1,000 mg per litre (mg/L).

Groundwater monitoring identified groundwater levels are relatively shallow (less than 3 m) (Worley 2025). A nearby DWER bore (DR1A CSGS) recorded maximum groundwater levels over the last 20 years range between 1.55 mAHD and 2.25 mAHD, decreasing towards the coast.

A search of the DWER Water Register (DWER, 2019a) identified there are no groundwater licences intersecting the Development Envelope.

Due to the industrial nature of the RIZ and history of industrial-related pollution of groundwater throughout the area, groundwater abstracted under licences in the immediate vicinity of the Proposal is used for non-potable purposes such as industrial process water.

The nearest public drinking water source area is the Jandakot Underground Water Pollution Control Area, located around 10 km east of the Development Envelope.

## 4.3 Flora and vegetation

The Proposal sits within an industrial and urban setting, with significant historical disturbance to vegetation. Throughout the Development Envelope there is a network of unauthorised tracks and illegal domestic waste dumping sites.

Within the Development Envelope, JBS&G (2025) confirmed the presence of 98 Tuart trees with a diameter at breast height (DBH) greater than 150 mm (Figure 4-1). The Tuart trees within the Development Envelope are in Moderate condition, with almost 80% in slightly stressed condition (75-90% foliage present). The patch of Tuart trees is considered part of the Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain Threatened Ecological Community (TEC) in accordance with the condition categories and thresholds in the Approved Conservation Advice (JBS&G, 2025; Figure 4-2). The Tuart TEC is in Moderate condition (TSSC, 2019) and covers 4.94 ha (including the 30 m canopy buffer and the additional 30 m patch buffer), forming a narrow strip running north to south adjacent to Patterson Road. This area is proposed for retention as an Eco-Cultural Buffer Zone (ECBZ) that covers approximately 6 ha.

A further site inspection undertaken by JBS&G in 2026, identified Tuart trees on the Water Corporation effluent pipeline corridor lot (Lot 503) and alongside Claymore Street where the potential connection to KWRP will run (Figure 4-1). The trees along Lot 503 are inferred to be part of the Tuart TEC, while the trees on Claymore Street are more isolated and potentially not representative of the TEC. Notwithstanding this, utility connections in these areas will be installed in already cleared areas (existing track and road) avoiding any direct impacts to the trees.

No threatened flora species listed under the EPBC Act or gazetted as Threatened pursuant to the *Biodiversity Conservation Act 2016* (BC Act) were opportunistically observed within the Development Envelope during the JBS&G (2025) ecological inspection.

Four significant weeds were identified in Development Envelope during an ecological inspection conducted in October 2025 (JBS&G, 2025):

- Bridal Creeper (*Asparagus asparagoides*) - listed as a Declared Pest;
- Narrow Leaf Cotton Bush (*Gomphocarpus fruticosus*): listed as a Declared Pest;
- Century Plant (*Agave americana*) – listed as a Permitted Organism; and
- Brazilian Pepper Tree (*Schinus terebinthifolia*) – listed as a Permitted Organism.

## 4.4 Fauna

The established Tuart trees and associated vegetation within the Development Envelope may provide foraging and breeding sites for threatened Carnaby's Cockatoo (*Calyptorhynchus latirostris*) and the Forest Red-tailed Black Cockatoo (*Calyptorynchus banksii naso)* (Commonwealth of Australia, 2019). Harewood (2025) identified 82 trees with a DBH greater than 30 cm as potential breeding trees within the Development Envelope; however, no suitable hollows were observed (Figure 4-3). Notwithstanding, the Tuart trees, which provide the highest value habitat within the Development Envelope, will be retained within the ECBZ.

Additional Tuart trees identified outside of the ECBZ that may be potential breeding trees for black cockatoos will also be retained within the Development Envelope (Figure 4-3). Potential indirect impacts to these trees will be managed by the measures outlined within this CEMP (refer to Section 6).

The native vegetation within the Development Envelope may also have some value to Quenda (*Isodon fusciventer* – P4), which have been previously recorded. Peregrine Falcon (*Falco peregrinus*) is known to occur in the broader area (Harewood, 2025).

## 4.5 Heritage

### 4.5.1 Aboriginal heritage

An archaeological and ethnographic heritage survey was undertaken on 15 October 2025 by seven Noongar Consultants and two Aboriginal Land Services (ALS) Heritage Consultants, with the assistance of four NeoSmelt representatives. The survey identified the following:

- No registered sites are located within the Development Envelope;
- No lodged heritage places are located within the Development Envelope;
- No historic heritage places are located within the Development Envelope;
- No previously unreported heritage places were identified; and
- No isolated artefacts were identified.

While no culturally significant sites or artefacts were identified, Gnaala Karla Booja (GKB) recognise the value in retaining mature Tuart trees and grass trees within the ECBZ, as well as future opportunities the Proposal may present, as identified through the Social Value Plan.

### 4.5.2 European heritage

A desktop review of heritage registers via the InHerit database was conducted for any registered sites within 500 m of the Development Envelope. One location was identified approximately 500 m southwest of the Development Envelope – the Kwinana Grain Terminal, Granary Museum & Jetty (ID: 18482).

## 4.6 Community

Several community receptors have been identified in proximity to the Proposal which have been considered in the assessment of potential environmental impacts related to the proposal, particularly in regard to air quality (i.e., noise, fumes and dust), including:

- Cee & See Caravan Park, North Rockingham to the southwest of the Proposal (represents the nearest residential area);
- Residential locations in North Rockingham, Calista and Hillman located within Kwinana EPP Area C to the south-southwest, east and south-southeast of the Proposal, respectively; and
- Community receptor locations (recreational and commercial premises [bottle shop, café and caretaker residence]) in Wells Park (Kwinana EPP Area A).
- Potential impacts to neighbouring premises in the WTC (Kwinana EPP Area A) will be considered in future iteration of the Air Quality Modelling Assessment, which will inform the application for works approval to be submitted to DWER.

## 4.7 Key sensitive receptors

The proposal has the potential to impact the surrounding community and environment; therefore, the CEMP is intended to provide management measures that minimise and avoid impacts to key sensitive receptors as identified in Table 4-1.

**Table 4-1: key sensitive receptors**

| Key sensitive receptors | Values | Potential impacts |
|---|---|---|
| Hydrology | While no surface water features are within the Development Envelope, groundwater levels are shallow (less than 3 m). | • alteration of groundwater recharge and surface water regimes due to creation of impervious surfaces;<br>• impacts to groundwater quality from spills or leaks of hydrocarbons and hazardous materials;<br>• Transport of groundwater contaminants via groundwater flows;<br>• Alteration to hydrological regimes via dewatering;<br>• Alteration to water quality as a result of waste discharge and/or stormwater runoff. |
| Flora and vegetation and fauna | • Tuart Woodland Threatened Ecological Community<br>• Fauna habitat for conservation significant species, including:<br>  ○ Black Cockatoos, and<br>  ○ Quenda | • Loss of native vegetation/ fauna habitat<br>  ○ Clearing of native vegetation/ fauna habitat that is designated for retention<br>  ○ Altered fire regimes increasing fire risk<br>• Degradation of native vegetation/ fauna habitat:<br>  ○ Spread and/or introduction of weeds<br>  ○ Generation and deposition of dust<br>  ○ Contamination from stormwater runoff or hazardous chemical spills |
| Heritage | While no heritage sites or artefacts have been identified within the Development Envelope, GKB have identified the importance of native vegetation protection. In particular:<br>  ○ seed collection;<br>  ○ retention of mature Tuart trees, and<br>  ○ retention or relocation of grass trees.<br>GKB will also have the opportunity for monitors to be present on site during clearing works. | Disturbance of archaeologic and ethnographic values. |
| Community | • Cee & See Caravan Park<br>• Residential locations in North Rockingham, Calista and Hillman;<br>• recreational and commercial premises [bottle shop, café and caretaker residence]) in Wells Park, and<br>• neighbouring premises in the Western Trade Coast | The Proposal has the potential to impact human health and amenity via emissions to air causing a reduction in ambient air quality |


**Legend**

- Development Envelope
- Cadastral boundary (LGATE-002)
- Eco-cultural Buffer Zone (ECBZ)
- Highway
- Minor road

Tuart tree condition

- healthy (90% foliage present)
- slightly stressed (75-90% foliage present)
- very stressed (< 50% foliage present)
- stressed (50-75% foliage present)
- dead medium (foliage absent, bark and fine twigs still present)
- Unknown

JBS&G

| | |
|---|---|
| Job No: 6892903 | |
| Client: BlueScope Future Industries Pty Ltd | |
| Version: A | Date: 29-Apr-2026 |
| Drawn By: droberts | |
| Checked By: JBailes | |

Scale 1:6,000 at A3

0 50 100
metres

Coord. Sys. GDA2020 MGA Zone 50

**Project NeoSmelt, East Rockingham WA 6168**

**TUART TREE CONDITION**

**FIGURE 4-1**

File Name: C:\Users\droberts\JBS&G Australia\DCS - Internal - V2\Projects\Bluescope\68929 Neosmelt\GIS\02_MapProjects\6892903_ProjectNeosmelt_s38_R02.aprx
Image Reference: www.nearmap.com© - Imagery Date: 21. January 2025.
Layout: 6892903_A3L_07_01_Tuart tree condition


**Legend**

- Development Envelope
- Cadastral boundary (LGATE-002)
- Eco-cultural Buffer Zone (ECBZ)

Tuart Threatened Ecological Community

- TEC buffer
- Tuart TEC patch buffer
- Highway
- Minor road

JBS&G

| | |
|---|---|
| Job No: 6892903 | |
| Client: BlueScope Future Industries Pty Ltd | |
| Version: A | Date: 29-Apr-2026 |
| Drawn By: droberts | |
| Checked By: JBailes | |

Scale 1:6,000 at A3

0 50 100
metres

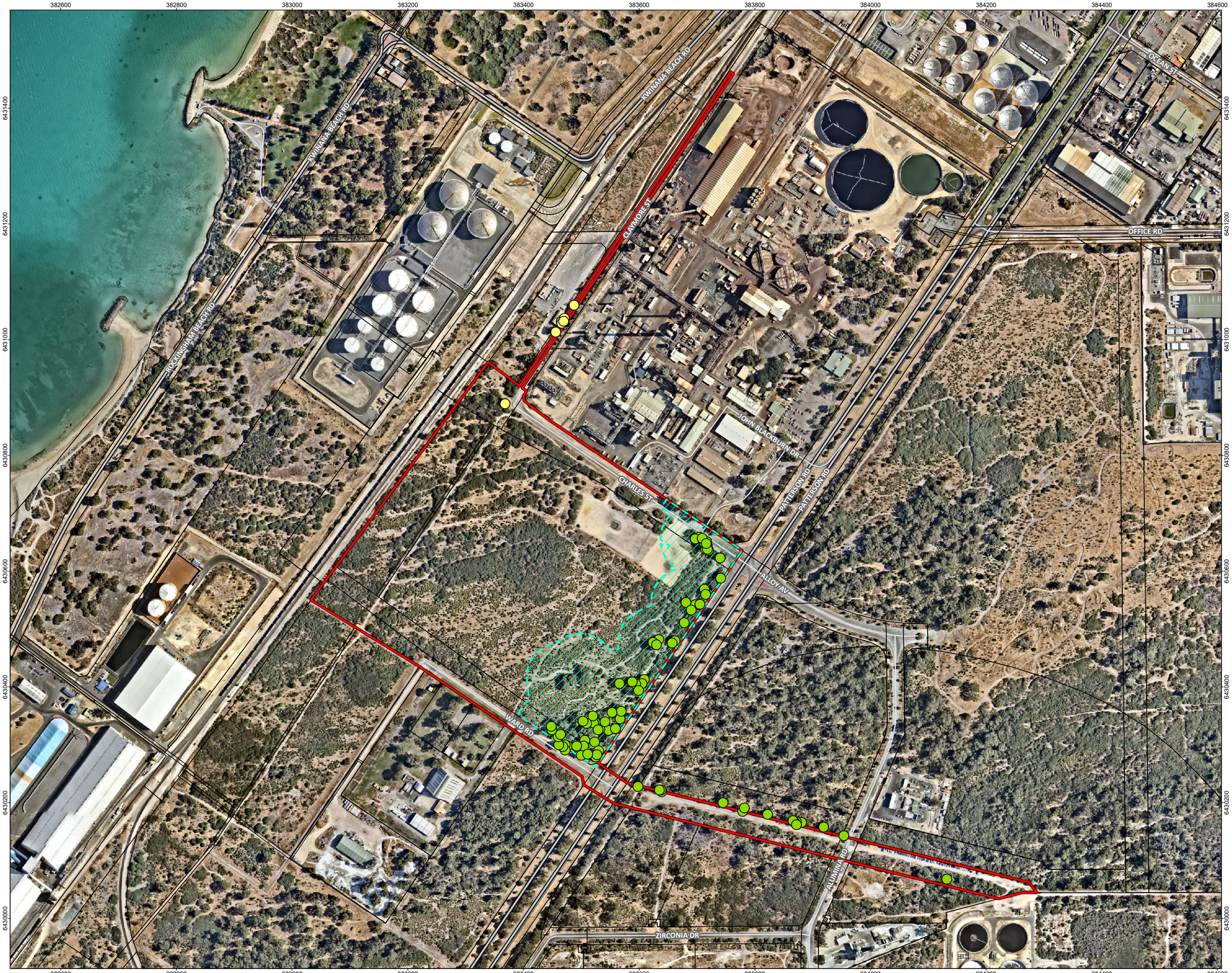
Coord. Sys. GDA2020 MGA Zone 50

**Project NeoSmelt, East Rockingham WA 6168**

**THREATENED ECOLOGICAL COMMUNITIES**

**FIGURE 4-2**

File Name: C:\Users\droberts\JBS&G Australia\DCS - Internal - V2\Projects\Bluescope\68929 Neosmelt\GIS\02_MapProjects\6892903_ProjectNeosmelt_s38_R02.aprx
Image Reference: www.nearmap.com© - Imagery Date: 21. January 2025.
Layout: 6892903_A3L_07_02_TEC




**Legend**

- Development Envelope
- Eco-cultural Buffer Zone (ECBZ)
- Cadastral boundary (LGATE-002)
- Highway
- Minor road
- Habitat Tree (DBH >30cm) [Harewood 2025]
- Habitat Tree (DBH >30cm) [JBS&G 2026]

JBS&G

| | |
|---|---|
| Job No: 6892903 | |
| Client: BlueScope Future Industries Pty Ltd | |
| Version: A | Date: 29-Apr-2026 |
| Drawn By: droberts | |
| Checked By: JBailes | |

Scale 1:6,000 at A3

0 50 100
metres

Coord. Sys. GDA2020 MGA Zone 50

**Project NeoSmelt, East Rockingham WA 6168**

**BLACK COCKATOO HABITAT TREES (DBH >30CM)**

**FIGURE 4-3**

File Name: C:\Users\droberts\JBS&G Australia\DCS - Internal - V2\Projects\Bluescope\68929 Neosmelt\GIS\02_MapProjects\6892903_ProjectNeosmelt_s38_R02.aprx
Image Reference: www.nearmap.com© - Imagery Date: 21. January 2025.
Layout: 6892903_A3L_08_01_BC habitat trees

# 5. Environmental factors

Based on the assessment of the potential environmental impacts associated with the Proposal, the environmental factors considered relevant to the Proposal are:

- Air quality;
- Greenhouse gas emissions;
- Flora and vegetation;
- Terrestrial Fauna; and
- Social surroundings;

In addition, some environmental factors have been identified that may be relevant to the MNES trigger of 'nationally threatened animal and plant species and ecological communities', including:

- Black cockatoo habitat, and
- *Tuart Woodlands and Forest of the Swan Coastal Plain Threatened Ecological Community* (Tuart TEC) – which was uplisted in 2019 and recorded within the Development Envelope.

A risk assessment of the Proposal construction activities that may impact the above environmental factors and matters is presented in Section 5.1.

## 5.1 Risk assessment

A qualitative risk assessment was conducted in accordance with the *Environmental Management Plan Guidelines* (DCCEEW, 2024) to assess the risks of the Proposal. Each environmental risk identified has been provided a likelihood and consequence rating using the criteria in Table 5-1 and Table 5-2. These ratings are then combined using Table 5-3 to generate a risk rating of Low, Medium, High or Severe.

**Table 5-1: Likelihood of occurrence**

| Qualitative measures for likelihood (how likely is it that this event/issue will occur) | |
|---|---|
| Highly likely | Is expected to occur in most circumstances. |
| Likely | Will probably occur during the life of the project. |
| Possible | Might occur during the life of the project. |
| Unlikely | Could occur but considered unlikely or doubtful. |
| Rare | May occur in exceptional circumstances. |

**Table 5-2: Consequence**

| Qualitative measures for consequence (what will be the consequence/result if this issue does occur rating) | |
|---|---|
| Minor | Minor incident of environmental damage that can be reversed. |
| Moderate | Isolated but substantial instances of environmental damage that could be reversed with intensive efforts. |
| High | Substantial instances of environmental damage that could be reversed with intensive efforts. |
| Major | Major loss of environmental amenity and real danger of continuing. |
| Critical | Severe widespread loss of environmental amenity and irrecoverable environmental damage. |

**Table 5-3: Risk rating**

| Likelihood | Consequence | | | | |
|---|---|---|---|---|---|
| | Minor | Moderate | High | Major | Critical |
| Highly likely | Medium | High | High | Severe | Severe |
| Likely | Low | Medium | High | High | Severe |
| Possible | Low | Medium | Medium | High | Severe |
| Unlikely | Low | Low | Medium | High | High |
| Rare | Low | Low | Low | Medium | High |

**Table 5-4: Environmental risk assessment**

| Element | Potential impacts | Inherent risk rating | | | Management measures | Residual risk rating | | |
|---|---|---|---|---|---|---|---|---|
| | | Likelihood | Consequence | Risk | | Likelihood | Consequence | Risk |
| Flora and vegetation | Poor management and/or supervision during construction activities may lead to the loss and/or degradation of remnant native vegetation outside of clearing boundaries | Possible | High | **Medium** | See Section 6.1.2 | Possible | Moderate | **Low** |
| | Uncontrolled access into the ECBZ may result in vandalism or damage to native vegetation | Possible | Moderate | **Medium** | See Section 6.1.2 | Rare | Moderate | **Low** |
| Fauna and habitat | Poor management and/or supervision during construction activities may lead to the loss of habitat for threatened fauna and migratory species | Possible | High | **Medium** | See Section 6.2.2 | Unlikely | Moderate | **Low** |
| | Vehicle interactions resulting in injury or death | Possible | Moderate | **Medium** | See Section 6.2.2 | Unlikely | Moderate | **Low** |
| Heritage | Damage to or destruction of culturally important materials/site | Unlikely | High | **Medium** | See Section 6.3.2 | Unlikely | Moderate | **Low** |
| Weeds and *Phytophthora* dieback | Introduction and/or spread of weed species and pathogens leading to reduced flora species and system diversity | Possible | Moderate | **Medium** | See Section 6.4.2 | Possible | Minor | **Low** |
| Dust | Dust generated for construction activities has the potential to impact on local flora and fauna and impact air quality | Highly likely | Minor | **Medium** | See Section 6.5.2 | Likely | Minor | **Low** |
| Noise and vibration | Temporary behavioural changes in fauna due to noise and vibration from construction activities | Likely | Minor | **Low** | See Section 6.6.2 | Possible | Minor | **Low** |
| | Noise generated outside of hours without prior approval | Unlikely | Minor | **Low** | See Section 6.6.2 | Unlikely | Minor | **Low** |

| Element | Potential impacts | Inherent risk rating | | | Management measures | Residual risk rating | | |
|---|---|---|---|---|---|---|---|---|
| | | Likelihood | Consequence | Risk | | Likelihood | Consequence | Risk |
| Fire | Site activities have the potential to cause bush fires in adjacent and retained vegetation, leading to damage or death of local flora, fauna, and/or communities | Possible | High | **Medium** | See Section 6.7.2 | Unlikely | High | **Medium** |
| Waste | Uncontrolled release of waste may result in pollution to groundwater, harm to native fauna, and could release contaminants into areas accessed by the public. | Unlikely | Moderate | **Low** | See Section 6.8.2 | Unlikely | Moderate | **Low** |
| | Improper waste storage may attract pests and feral animals resulting to harm to native fauna. | Possible | Moderate | **Low** | See Section 6.8.2 | Possible | Minor | **Low** |

# 6. Construction Environmental Management Plan

This CEMP includes management actions specific to the construction phase of the Proposal, relevant to the following elements:

- Vegetation and flora;
- Fauna and habitat;
- Weed and dieback management;
- Dust management;
- Noise and vibration management;
- Fire management; and
- Waste management.

In addition to this CEMP, an Eco-cultural Buffer Zone Management Plan (ECBZ MP) has been developed to ensure protection of the retained vegetation throughout implementation of the Proposal.

A separate CEMP exists to support the wider RIZ SEA (MS 863) and will be implemented accordingly, with the measures included in this CEMP intended to be 'site specific' to support the Proposal.

## 6.1 Vegetation and flora

Construction activities associated with development of the Proposal may result in the following potential impacts to vegetation and flora:

- Clearing of vegetation proposed for retention within the Development Envelope;
- Unauthorised access into retained vegetation areas (ECBZ);
- Introduction of *Phytophthora dieback* into the Development Envelope;
- Introduction/spread of weeds into retained areas of vegetation (ECBZ);
- Deposition of dust onto retained vegetation; and
- Stockpiling of mulch, fill or topsoil.

Management of weeds and dieback are addressed and Section 6.4, and management of dust is addressed in Section 6.5.

### 6.1.1 Objectives targets and performance indicators

Objectives, targets and performance indicators for the management of vegetation and flora are detailed within Table 6-1.

**Table 6-1: Objectives, targets and performance indicators - vegetation and flora**

| Objective | Target | Performance Indicator |
|---|---|---|
| To minimise and manage disturbance to native flora and vegetation | All clearing and construction activities undertaken within the approved Disturbance Footprint | No unauthorised clearing of vegetation |
| | | No unauthorised access into the ECBZ |

### 6.1.2 Management actions

Management actions for vegetation and flora are detailed below in Table 6-2, with reference to existing conditions/ commitments as per MS 863 provided.

**Table 6-2: Management actions - flora and vegetation**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 condition/ commitment reference |
|---|---|---|---|---|---|
| CEMP 1. | Site induction | Induct all personnel and contractors to the environmental requirements of the site. | Prior to personnel and contractors commencing works on site | Construction Contractor | RIZ CEMP – M6 |
| CEMP 2. | | Within the induction material, include information detailing the importance of the retained vegetation within the ECBZ and the boundaries which will be in place. | Prior to clearing | Construction Contractor | RIZ CEMP – M6 |
| CEMP 3. | Clearing of vegetation | Provide GPS coordinates of areas approved to be cleared and retained to the contractor to ensure no unapproved clearing is undertaken. | Prior to clearing | Project Manager/ Construction Contractor | N/A |
| CEMP 4. | | Clearly demarcate clearing areas and trees proposed to be retained on-site with temporary fencing or flagging tape and within appropriate plans for contractor/personnel reference. | Prior to clearing | Construction contractor | RIZ CEMP - M3, & M4 & M5 |
| CEMP 5. | | Identify that areas of works are clearly demarcated at a pre-start meeting. This meeting will include a site walkover and will be documented. | Prior to clearing | Project Manager/ Construction Contractor | N/A |
| CEMP 6. | | All vegetation cleared will be recorded within the vegetation clearing register. | Following each clearing event | Construction Contractor | N/A |
| CEMP 7. | | Cleared areas to remain stabilised with water, hydro-mulch or other materials as required. | Following each clearing event | Construction Contractor | RIZ CEMP M15 |
| CEMP 8. | Retention of vegetation | Native vegetation will be retained where practicable throughout the Development Envelope. | Throughout clearing program | Construction Contractor | RIZ CEMP M1 |
| CEMP 9. | | Grass trees (balga) are to be salvaged and reused in landscaping or distributed to local groups and organisations, in consultation with GKBAC, as per advice from Aboriginal Land Services (2025). | Prior to clearing | Construction Contractor | RIZ CEMP M10 & M11 |

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 condition/ commitment reference |
|---|---|---|---|---|---|
| CEMP 10. | | Tuart trees (Tuart TEC) will be retained within the designated Eco-cultural Protection Zone (ECBZ). | Prior to works commencing | Construction Contractor | RIZ CEMP M2 |
| CEMP 11. | | Seed collection of native species to be used by NIASA accredited nursery or provided to community planting programs or donated to traditional owners, in consultation with GKBAC, as per advice from Aboriginal Land Services (2025). | Prior to clearing. | Construction Contractor | RIZ CEMP M8 & M9 |
| CEMP 12. | Site access | Fencing will be installed to clearly mark, and restrict access to, retained vegetation. | Prior to clearing. | Construction Contractor | RIZ CEMP M3 |
| CEMP 13. | | Install temporary signage where appropriate to restrict unauthorised access to retention areas. | Prior to clearing | Construction Contractor | N/A |
| CEMP 14. | | No machinery, equipment or laydown areas to be located within areas of native vegetation to be retained. | During construction | Construction Contractor | N/A |
| CEMP 15. | Stockpiling | No stockpiling (i.e., topsoil, mulch, etc) within areas proposed for vegetation retention. | During construction | Construction Contractor | RIZ CEMP M17 |
| CEMP 16. | | Low weed burden or trees (and logs) are to be kept separate to weedy understorey stockpiles for mulching for use in landscaping works, where practicable. Excess mulch or logs are to be provided to local authorities and/or traditional owners. | During clearing/ construction | Construction Contractor | RIZ CEMP M12 & M13 & M14 |
| CEMP 17. | | No materials generated by clearing are to be burnt. | During and following clearing works | Construction Contractor | RIZ CEMP M16 |
| CEMP 18. | | Topsoils are to be kept away from retained vegetation and constructed drainage swales and appropriately disposed of in accordance with EP Regulations 1987. | During clearing/ construction | Construction Contractor | RIZ CEMP M25 & M26 & M27 |
| CEMP 19. | Environmental incident reporting | Report all environmental incidents related to vegetation clearing in accordance with Section 7.2.2. | During construction | Construction Contractor | N/A |

### 6.1.3 Contingency actions

Contingency actions will be initiated if monitoring indicates that target and performance indicators are not being met. Table 6-3 outlines triggers relating to relevant parameters and the subsequent contingency actions to be implemented.

**Table 6-3: Contingency actions - vegetation and flora**

| Trigger | Contingency actions |
|---|---|
| Vegetation clearing or unauthorised access by machinery/ personnel within designated retention areas | • Investigate cause<br>• Re-instate appropriate boundary fencing and signage<br>• Undertake revegetation of area cleared<br>• Review effectiveness of the management action and identify opportunities for improvement<br>• Communicate outcomes of the incident and the boundaries of retained vegetation at a contractor toolbox meeting<br>• Monitor the success of remediation measures. |
| Stockpiles in unauthorised location | • Investigate cause, including photographing the location and potential impact of the stockpile to the retained vegetation<br>• Move stockpiles to appropriate location<br>• Review the effectiveness of the management action and identify opportunities for improvement<br>• Communicate outcomes of the incident and the required distances for stockpile locations at a toolbox meeting<br>• Monitor the success of remediation measures. |

## 6.2 Fauna and habitat

Construction of the development may result in the following impacts to fauna and habitat:

- Displacement of fauna through clearing and construction activities
- Disruption of breeding activities of significant fauna
- Injury, illness or death of fauna during clearing and construction activities
- Clearing/encroachment of fauna habitat proposed for retention within/adjacent to the site

### 6.2.1 Objectives, targets, and performance indicators

Objectives, targets and performance indicators for the management of fauna and habitat are detailed in Table 6-4 .

**Table 6-4: Objectives, targets and performance indicators - fauna and habitat**

| Objective | Target | Performance indicator |
|---|---|---|
| To minimise and manage impacts to fauna and habitat | No clearing or disturbance of habitat outside pre-defined boundaries throughout the duration of construction of the site.<br>Boundaries will be discernibly marked by fencing, flagging or similar to differentiate remnant vegetation and vegetation to be cleared. | All activities are undertaken within the approved disturbance footprint. |
| | Directional clearing into areas of retained vegetation to ensure fauna can escape. | |

### 6.2.2 Management actions

Management actions for fauna and habitat are detailed in Table 6-5, with reference to existing conditions/ commitments as per MS 863 provided.

**Table 6-5: Management actions - fauna and habitat**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 condition/ commitment reference |
|---|---|---|---|---|---|
| CEMP 20. | Site induction | Include information in the induction material detailing the importance of protected fauna, retained habitat and significant trees, the respective boundaries that will be in place and relevant reporting criteria for fauna interactions. | Prior to personnel and contractors commencing works on site | Construction Contractor / Project Manager | RIZ CEMP M62 & M63 |
| CEMP 21. | Clearance of habitat | Suitably qualified and licenced zoologists will undertake a fauna trapping program on site (targeting quenda, nesting birds, reptiles/ amphibians), relocating fauna to nearby bushland as soon as practicable, or humanely euthanising pests, in accordance with a licence (domestic pets identified on site, if any, will be delivered to the City of Rockingham Animal Management Facility) | Prior to clearing (no more than 7 days prior to clearing for 5 nights, or until no more captures) | Project Manager | RIZ CEMP M43 & M44 & M45 & M48 & M49 & M52 & M54 & M58 & M59 & M60 & M61 |
| CEMP 22. | | A pre-fauna trapping inspection to be undertaken to identify suitable trap locations and evidence of fauna (i.e., kangaroos or active bird nests) on site. | Prior to fauna trapping program and prior to clearing. | Project Manager | RIZ CEMP M46 |
| CEMP 23. | | Fauna traps will be located away from ant nests and protection for trapped animals from ants/ other insects will be undertaken utilising approved insecticide around the entrance | During fauna trapping, prior to clearing | Project Manager | RIZ CEMP M55 |
| CEMP 24. | | Should clearing be undertaken between November to January, clutches of reptile eggs (if identified during pre-clearing site inspections) will be carefully removed and provided to an appropriate native reptile carer. | Prior to clearing | Project Manager | RIZ CEMP M56 |

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 condition/ commitment reference |
|---|---|---|---|---|---|
| CEMP 25. | | Reptile trapping lines consisting of pitfall and funnel traps will be set up along flywire drift fences and deployed prior to vegetation clearing between September – April, to be checked no more than three (3) hours after sunrise, dusk and if the maximum temperature exceeds 30 degrees Celsius between midday and 2pm. | Prior to clearing | Project Manager | RIZ CEMP M53 |
| CEMP 26. | | Clearing works will be suspended should fauna be identified, including if black cockatoos be observed foraging on site, until the cockatoos have left the site or for fauna capture and relocation, where possible. | During clearing | Project Manager | RIZ CEMP M47 & M67 & M69 |
| CEMP 27. | | If kangaroos are recorded on site during the pre-inspection they are to be translocated or euthanised following sedation, in consultation with the City of Rockingham. | Prior to clearing | Project Manager | RIZ CEMP M50 |
| CEMP 28. | | If clearing is to be undertaken during September to November, the site will be checked for Rainbow Bee-eater burrows and if found, a 20 m buffer will be placed around the burrow and earthworks will be suspended in the buffer until breeding is complete, juveniles have fledged and the burrow is declared empty. | Prior to clearing | Project Manager | RIZ CEMP M51 |
| CEMP 29. | | Clearing to be undertaken in a slow and progressive manner from one direction to the other to allow fauna to move to adjacent native vegetation. Trees to be cleared will be first 'bumped' with machinery before being felled. | Prior to clearing | Construction Contractor | RIZ CEMP M66 |

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 condition/ commitment reference |
|---|---|---|---|---|---|
| CEMP 30. | | Ensure a suitably qualified zoologist is present during clearing works to handle any remaining fauna (if identified), or injured, abandoned or otherwise visibly distressed fauna. | During clearing | Construction Contractor | RIZ CEMP M57 & M65 & M68 |
| CEMP 31. | | If any injured, abandoned or otherwise visibly distressed fauna are observed when a wildlife handler is not available, contact the Parks and Wildlife hotline (08 9474 9055). | During clearing | Construction Contractor | RIZ CEMP M64 |
| CEMP 32. | | All excavations being left overnight must have adequate egress for fauna that may become trapped. | During clearing | Construction Contractor | N/A |
| CEMP 33. | | Felled trees to be inspected for suitability to be used as artificial nest hollows for black cockatoos and provided (free of charge) for such use. DBCA to be informed if hollows are provided to community groups. | During clearing | Construction Contractor | RIZ CEMP M70 & M71 & M72 |
| CEMP 34. | | All vehicles and machinery are not to exceed speeds of 40 km/hr throughout the site, to minimise risks of fauna strike. | During construction | Construction contractor | N/A |
| CEMP 35. | Fauna interactions | Feeding of fauna is not permitted. | During construction | All personnel | N/A |
| CEMP 36. | | A fauna interactions register is to be maintained to capture observations and interactions with fauna. | During construction | Construction contractor | RIZ CEMP M63 |
| CEMP 37. | | No domestic animals will be permitted to be brought into the site by construction personnel. | During construction | All personnel | N/A |
| CEMP 38. | | Waste will be managed as per Section 6.8, as not to attract fauna to the site. | During construction | All personnel | N/A |

### 6.2.3 Contingency actions

Contingency actions will be initiated if monitoring indicates that target and performance indicators are not being met. Table 6-6 outlines triggers relating to relevant parameter and the subsequent contingency actions to be implemented.

**Table 6-6: Contingency actions - fauna and habitat**

| Trigger | Contingency actions |
|---|---|
| Clearing and construction activities result in injury or mortality to native conservation significant fauna | • The incident is to be immediately reported to the site supervisor.<br>• Any injured fauna shall be left alone and observed until a suitably qualified person can attend to the animal.<br>• Once the animal has been attended to, investigate the cause of the incident.<br>• Implement appropriate measures to ensure the incident does not re-occur (e.g., lower site speed limits, undertake fauna relocation works, recommunicate environmental values to personnel).<br>• Review effectiveness of the management action.<br>• Communicate outcomes of the incident to personnel at a toolbox meeting.<br>• Record incident and outcome in the incident and complaints register in MARS. |
| Habitat clearing within designated retention areas | • Investigate cause.<br>• Re-instate appropriate boundary fencing and signage.<br>• Undertake revegetation of habitat cleared.<br>• Review effectiveness of the management action and identify opportunities for improvement.<br>• Communicate outcomes of the incident and the boundaries of retained habitat at a contractor toolbox meeting.<br>• Monitor the success of remediation measures. |

## 6.3 Heritage

No known cultural heritage sites are present within the Development Envelope. Should any heritage sites/ materials be identified, site personnel should stop all works and refer to the unexpected finds procedure for appropriate steps, including notifying relevant government agencies. Additionally, Aboriginal Land Services (2025) provided site specific recommendations for managing construction with respect to cultural values and ongoing collaboration with Gnaala Karla Booja Aboriginal Corporation (GKBAC). Recommendations relevant to this CEMP include:

- Recommendation 1 – Engage GKB-nominated Traditional Owners as cultural monitors during ground disturbance work (refer to CEMP 41);
- Recommendation 2 – Ensure all employees and contractors working within the project area are made aware of the purpose of cultural monitors (refer to CEMP 39);
- Recommendation 3 – Ensure all site personnel, including cultural monitors are aware of the Unexpected Finds Procedure (refer to CEMP 39);
- Recommendation 4 – Salvage *boorack*/ balga trees that may be impacted by construction activities (refer to CEMP 9);
- Recommendation 5 – Provide opportunities for seed collection to be completed in consultation with GKBAC (refer to CEMP 11), and
- Recommendation 6 – Exclude remnant vegetation on the eastern portion of the Development Envelope from clearing (refer to CEMP 10).

### 6.3.1 Objectives, targets and performance indicators

Objectives, targets and performance indicators for the management of heritage aspects are detailed in Table 6-7.

**Table 6-7: Objectives, targets and performance indicators - heritage**

| Objective | Target | Performance indicator |
|---|---|---|
| To avoid or minimise impacts to all cultural values | No clearing or disturbance heritage places/ materials, if identified on site | No recorded disturbance to identified Aboriginal heritage sites or materials. |

### 6.3.2 Management actions

Management actions relevant to the avoidance and protection of heritage sites and materials is detailed in Table 6-8, with reference to existing conditions/ commitments as per MS 863 provided.

**Table 6-8: Management actions - Heritage**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 condition / commitment reference |
|---|---|---|---|---|---|
| CEMP 39. | Site induction | Induct all personnel and contractors to the cultural heritage values of the site, including:<br>○ Purpose of cultural monitors (CEMP 41)<br>○ information regarding identification of materials that may constitute an archaeological site<br>○ requirements of the *Aboriginal Heritage Act 1972* regarding such sites.<br>○ Unexpected Finds Procedure. | Prior to personnel and contractors commencing works on site | Construction Contractor / Project Manager | RIZ CEMP M75 |
| CEMP 40. | Signage | Acknowledgement of the historical and cultural associations of the site for Nyungars through interpretive signage, as per advice from Aboriginal Land Services (2025). | Prior to ground disturbing activities. | Project Manager | n/a |
| CEMP 41. | Monitors | Engage Noongar Consultants to monitor ground disturbing works (removal of vegetation and earthworks that would impact on topsoil), as per advice from Aboriginal Land Services (2025). | During ground disturbing activities | Project Manager | n/a |
| CEMP 42. | Avoidance/ protection of heritage values | Avoid or minimise impacts to all heritage places – clearly demarcating heritage places if present on site and avoid impacts to any identified sites. | During ground disturbing activities | Project Manager/ Construction Contractor | RIZ CEMP M73 |
| CEMP 43. | | Should unexpected finds be identified, refer to 'Unexpected Finds Procedure' to ensure the protection and appropriate management of heritage material. Including:<br>• Stop all construction works<br>• Clearly demarcation location of site/ materials<br>• Notify DPLH. | During ground disturbing activities | Construction contractor | RIZ CEMP M76 |
| CEMP 44. | | Established native trees will be considered for retention where possible – particularly Tuarts which are to be retained within the ECBZ. | During ground disturbing activities | Construction contractor | RIZ CEMP M74 |

| | | | | | |
|---|---|---|---|---|---|
| CEMP 45. | Reporting | Document any finds in BlueScope HSEC Management System – MARS | During ground disturbing activities | Construction contractor | N/A |

### 6.3.3 Contingency actions

Contingency actions will be initiated if monitoring indicates that target and performance indicators are not being met. Table 6-9 outlines triggers relating to each relevant parameter and the subsequent contingency actions to be implemented.

**Table 6-9: Contingency actions – heritage**

| Trigger | Contingency actions |
|---|---|
| Materials pertaining to cultural heritage are identified on site. | • Stop all works within the vicinity of the finds<br>• Refer to the unexpected finds procedure<br>• Clearly demarcate the location of finds and notify DPLH. |

## 6.4 Weed and dieback management

Construction activities may introduce soil pathogens into the Development Envelope and decrease the condition of retained vegetation through:

- Introducing soil pathogens to the site and adjacent vegetation; and
- Introducing and/or spreading weeds within the site and adjacent vegetation.

### 6.4.1 Objectives, targets and performance indicators

Objectives, targets and performance indicators for weed and dieback management are detailed in Table 6-10.

**Table 6-10: Objectives, targets and performance indicators - weeds and dieback**

| Objective | Target | Performance indicator |
|---|---|---|
| Prevent the introduction and spread of weeds and dieback to/ within the site | All vehicles and machinery are free of soil/plant material prior to entering the site | Inspection checklist includes recording of all vehicles and machinery being 'clean on entry' prior to entering the site |

### 6.4.2 Management actions

Management actions for weed and dieback control are detailed in Table 6-11. Weed management specific to areas of retained vegetation (i.e., within the ECBZ) are detailed within the ECBZ Management Plan, which includes measures such as monitoring and management, ensuring the ECBZ is free of weed species that are Declared Pests under the BAM Act.

**Table 6-11: Management actions - weed and dieback**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 condition / commitment reference |
|---|---|---|---|---|---|
| CEMP 46. | Induction | Include information pertaining to weed and dieback management in the induction, including:<br>The requirement for vehicles and machinery to be 'clean on entry'; and<br>Access restrictions relating to retained vegetation. | Prior to personnel and contractors commencing works on site | Construction Contractor / Project Manager | N/A |
| CEMP 47. | Vehicle operation | Inspect and ensure that all vehicles and machinery are free of soil and plant material. | Prior to arrival on site | All personnel | |
| CEMP 48. | | Maintain accurate records of all vehicles/machinery being inspected and 'clean on entry'. | Upon arrival on site | Construction Contractor | |
| CEMP 49. | | Require operators to leave site and clean vehicles/machinery which are determined to not meet hygiene standards. | Upon arrival on site | Construction Contractor | |
| CEMP 50. | Access | Restrict all vehicle access to areas of retained vegetation, excluding for landscaping/ rehabilitation works. | During construction | Construction Contractor | |
| CEMP 51. | Stockpiles (topsoil, mulch and fill) | Locate topsoil, mulch and fill stockpiles more than 50 m from retained vegetation. | During construction | Construction Contractor | |

### 6.4.3 Contingency actions

Contingency actions will be initiated if monitoring indicates that the target and performance indicators are not being met. Table 6-12 outlines triggers relating to each relevant parameter and the subsequent contingency actions to be implemented.

**Table 6-12: Contingency actions - weed and dieback**

| Trigger | Contingency actions |
|---|---|
| Vehicles not clean on entry | • Investigate cause<br>• Ensure importance of maintaining hygiene is communicated to all personnel |
| Evidence of weed density increase, attributed to construction activities. | • Clean-down affected machinery/ vehicles at designated clean/ wash down station or return to construction contractor depot<br>• Implement weed control within areas of retained vegetation exhibiting increased weed density. |

## 6.5 Dust management

Construction activities have the potential to release high amounts of dust particles into the local environment. Strong winds can increase the local dust levels. Excessive dust levels can have adverse effects on human health and vegetation, and create an uncomfortable and potentially unsafe working environment.

The key dust generating activities associated with development of the site are likely to include:

- Vehicular movement on unsealed roads;
- Earthworks and excavations;
- Transfer of soil to stockpile; and
- Wind erosion of stockpiled materials.

Specific construction commencement dates cannot yet be confirmed as they are dependent on a variety of factors including, but not limited to:

- Project scheduling.
- Contractor availability; and
- State environmental and planning approvals.

### 6.5.1 Objectives, targets and performance indicators

Objectives, targets and performance indicators for dust generation are detailed within Table 6-13.

**Table 6-13: Objectives, targets and performance indicators - dust management**

| Objective | Target | Performance indicator |
|---|---|---|
| Mitigate dust generation on site to minimise impacts to the local environment, in accordance with A guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities (DEC 2011) | Minimise ambient dust emissions as a result of construction activities | No public dust complaints |
| | | No decline in retained vegetation condition as a result of dust emissions associated with construction activities |

### 6.5.2 Management actions

Management actions for the minimisation of dust are detailed in Table 6-14, with reference to existing conditions/ commitments as per MS 863 provided.

**Table 6-14: Management actions - dust**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 conditions/ commitments reference |
|---|---|---|---|---|---|
| CEMP 52. | Inductions/meetings | Include weather conditions (from the Bureau of Meteorology) in daily prestart meetings. | During construction | Construction Contractor / Project Manager | N/A |
| CEMP 53. | Vehicle operations | Maintain road surfaces in a good condition and suitable grades. | During construction | Construction Contractor | |
| CEMP 54. | | Vehicles must only be parked in allocated areas. | During construction | Construction Contractor | |
| CEMP 55. | | Vehicle speeds on site must be restricted to <10 km/hr to reduce dust emissions. | During construction | Construction Contractor | |
| CEMP 56. | | All vehicles entering and leaving site must have covered loads. | During construction | Construction Contractor | |
| CEMP 57. | Construction activities | Avoid dust generating activities during unfavourable weather conditions (e.g. high wind speed) and unfavourable wind directions, where practicable. | During construction | Construction Contractor | |
| CEMP 58. | | During the use of water carts ensure that the overspray is adjusted to limit the influence on fringe vegetation and offsite runoff | During construction | Construction Contractor | |
| CEMP 59. | | Implement dust suppression (e.g. water spray/ wet down of unsealed tracks and/ or stockpiles if high levels of dust are observed or considered likely. | During construction | Construction Contractor | |
| CEMP 60. | | Cleared areas will be stabilised to prevent wind-blown dust generating on site and dust suppression methods must be used on unsealed roads, access tracks, cleared areas, and locations of high dust and impact risk | During clearing/ construction | Construction Contractor | RIZ CEMP M15 |

### 6.5.3 Contingency actions

Contingency actions will be initiated if monitoring indicates that target and performance indicators are not being met. Table 6-15 outlines triggers relating to each relevant parameter and the subsequent contingency measures to be implemented.

**Table 6-15: Contingency actions - dust**

| Trigger | Contingency actions |
|---|---|
| Visible dust movement outside of the site or impacting areas of retained vegetation after implementing dust control measures. | • Stop works<br>• Investigate the cause of dust movement (sever weather conditions or faulty dust suppression equipment)<br>• If weather conditions are the cause of ineffective dust suppression, do not recommence works until weather is favourable<br>• If dust suppression equipment is faulty, fix equipment<br>• Only recommence works once dust suppression equipment is functional. |
| Investigate the cause of dust movement (sever weather conditions or faulty dust suppression equipment) | • Assess when dust complaint was received, the weather conditions at the time and construction activities on site<br>• Review the effectiveness of the management actions and identify opportunities for improvement.<br>• Communicate outcomes of the incident at a toolbox meeting.<br>• Assess whether there is a requirement for onsite instrumental dust monitoring. |

## 6.6 Noise and vibration management

Noise and vibration associated with construction of the development may result in the following potential impacts to the local environment:

- Nuisance to fauna and the masking of predator movements; and
- Noise levels at a time and magnitude that may cause nuisance to members of the public.

### 6.6.1 Objectives, targets and performance indicators

Objectives, targets and performance indicators for the management of noise and vibrations are detailed in Table 6-16.

**Table 6-16: Objectives, targets and performance indicators - noise and vibration**

| Objective | Target | Performance indicator |
|---|---|---|
| To minimise noise and vibration emissions consistent with the provisions of the Environmental Protection (Noise) Regulations 1997. | Minimise noise and vibration emissions as a result of construction activities. | No noise and vibration related complaints for public |

### 6.6.2 Management actions

Management actions for noise and vibration during construction activities are detailed in Table 6-17. A noise management plan will also be developed to ensure ongoing management of noise related impacts associated with implementation of the Proposal.

**Table 6-17: Management actions - noise and vibration**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 Condition/ commitments reference |
|---|---|---|---|---|---|
| CEMP 61. | Construction activities | Undertake construction activities between the hours of 7 am and 7 pm Monday to Saturday, excluding public holidays. | During construction | Construction Contractor | N/A |
| CEMP 62. | | All plant and equipment must be appropriately fitted, maintained or substituted with noise reduction devices to comply with the noise limits (use of exhaust mufflers/ noise dampers for noise suppression). | During construction | Construction Contractor | |
| CEMP 63. | | Regular checks and maintenance must be undertaken to ensure all equipment and vehicles are in good working order. | During construction | Construction Contractor | |

### 6.6.3 Contingency actions

Contingency actions will be initiated if monitoring indicates that target and performance indicators are not being met. Table 6-18 outlines triggers relating to each relevant parameter and the subsequent contingency measures to be implemented.

**Table 6-18: Contingency actions - noise and vibration**

| Trigger | Contingency actions |
|---|---|
| Excessive noise and vibration noted during visual monitoring or receipt of a reasonable residents' complaint | • Record complaint within the Incidents and complaints register<br>• Assess when noise/ vibration compliant was received and the construction activities on site at the time<br>• Review the effectiveness of the management actions and identify opportunities for improvement<br>• Communicate outcomes of the incident at a toolbox meeting<br>• Assess whether the is a requirement for onsite noise/ vibration monitoring. |

## 6.7 Fire management

Construction works may increase the risk of fire through:

- The operation of equipment and machinery;
- Handling and storage of flammable liquids;
- Inappropriate storage of waste materials including cigarette butts; and
- The presence of vegetation stockpiles which can act as fuel sources.

### 6.7.1 Objectives, targets and performance indicators

Objectives, targets and performance indicators for fire mitigation are detailed within Table 6-19.

**Table 6-19: Objectives, targets and performance indicators - fire mitigation**

| Objective | Target | Performance indicator |
|---|---|---|
| To prevent fires from occurring as a result of construction activities | No fires on site during the construction phase of the Proposal | Number of environmental incidents arising from fire |

### 6.7.2 Management actions

Management actions for fire prevention are detailed in Table 6-20. In addition, a Bushfire Management Plan will be prepared for the Proposal, as required by MS 863.

**Table 6-20: Management actions – fire prevention**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 Conditions/ Commitments reference |
|---|---|---|---|---|---|
| CEMP 64. | Inductions/ meetings | The daily fire danger ratings will be obtained from the Bureau of Meteorology and communicated to personnel during the daily pre-start meeting.<br>Personnel will also be informed of vehicle access restrictions, such as speed limits and boundaries. | Prior to commencing work on site | Construction Contractor / Project Manager | n/a |
| CEMP 65. | | Potential fire risks and associated management actions will be included in each induction to site personnel and contractors. | Prior to commencing work on site. | Construction Contractor | |
| CEMP 66. | Storage and handling of flammable materials | Store all flammable materials as specified by the manufacturer's instructions. | At all times | Construction Contractor | |
| CEMP 67. | | Locate flammable materials at a designated hazardous materials storage location. | At all times | Construction Contractor | |
| CEMP 68. | | Handling of chemicals/fuels shall take place off-site, or at a designated hazardous materials storage and handling location. | At all times | Construction Contractor | |
| CEMP 69. | Hot work (welding, grinding, flame cutting) | Conduct all hot work in areas clear of flammable materials (including vegetation). | At all times | All personnel | |
| CEMP 70. | Vehicle movements | Restrict or prohibit vehicle movements during times of increased fire risk/ total bans, by way of fenced, flagged or similar boundaries to restrict or prohibit access to remnant vegetation. Also, speed limits of 40km/h will be positioned throughout the site. | Construction | Construction Contractor | |
| CEMP 71. | | All vehicles must be fitted with fire extinguishers. | Construction | Construction Contractor | |
| CEMP 72. | | Maintain all machinery and vehicles in good condition to minimise risk of fires. | Construction | All personnel | |
| CEMP 73. | | Plant and vehicles operating over or through uncleared vegetation must be fitted with appropriate exhaust systems positioned or covered so that the vegetation cannot come into contact with the exhaust system. | Construction | Construction Contractor | |
| CEMP 74. | Smoking | Smoking must only take place in designated smoking areas, with butts disposed of appropriately. | Construction | All personnel | |

### 6.7.3 Contingency actions

Contingency measures for fire prevention are detailed in Table 6-21.

**Table 6-21: Contingency measures - fire prevention**

| Trigger | Contingency actions |
|---|---|
| Fire incident | • Investigate cause<br>• Consult with local fire authorities in relation to improvements in fire prevention measures<br>• If fire impacts retained vegetation, implement remedial actions such as post fire weed control or planting<br>• Monitor success of any revegetation works, if relevant<br>• Communicate to all personnel through toolbox meetings. |

## 6.8 Waste management

Waste will require management during construction activities to prevent attracting animals (pets, feral and native) and generating waste that may impact vegetation to be retained, within and adjacent to the site. Potential waste streams include:

- Domestic waste – putrescible, plastics, glass, aluminium;
- Construction waste – wood, metal, plastic, inert waste (concrete, bricks);
- Controlled waste – hydrocarbons, packaged waste;
- Sewage waste.

### 6.8.1 Objectives, targets and performance indicators

Objectives, targets and performance indicators for waste management are detailed within Table 6-22.

**Table 6-22: Objectives, targets and performance indicators - waste management**

| Objective | Target | Performance indicator |
|---|---|---|
| To ensure that the management and disposal of waste throughout construction of the site does not negatively impact the health, welfare and amenity of people and fauna, or cause environmental harm. | • All waste is appropriately contained within designated vessels/ areas during construction activities<br>• All waste is removed from site and disposed of appropriately during and following construction activities<br>• No occurrence of waste moving off-site without record<br>• Maintain records of controlled waste removed from site<br>• No impacts to human or fauna health as a result of inappropriate waste disposal. | Zero incidents raised as a result of inadequate waste management. |

### 6.8.2 Management actions

Management actions for waste are detailed below in Table 6-23. In addition to these measures a Waste Management Plan will be prepared for the Proposal, as required under MS 863.

**Table 6-23: Management Actions - waste**

| CEMP reference | Parameter | Management actions | Timing | Responsibility | MS 863 Conditions/ commitments reference |
|---|---|---|---|---|---|
| CEMP 75. | Induction / meetings | Appropriate waste management measures will be included in each induction to site personnel and contractors. | Prior to commencing works onsite | Construction Contractor / Project Manager | N/A |
| CEMP 76. | Domestic waste | Waste skips and bins must have lids and kept closed to contain litter. | Ongoing | Construction Contractor | |
| CEMP 77. | | Littering is prohibited and all areas must be kept free from wind-blown waste generated through storage or transport. | Ongoing | Construction Contractor | |
| CEMP 78. | | Waste must be taken off-site to an authorised waste facility regularly to ensure it does not overflow. | Ongoing | Construction Contractor | |
| CEMP 79. | | Remove all rubbish that has been dumped or has drifted into stands of retained vegetation. | Ongoing | Construction Contractor | |
| CEMP 80. | | All waste must be removed from site following the completion of construction works (for every stage). | Ongoing | Construction Contractor | |
| CEMP 81. | Controlled/ sewage waste | Chemical, hydrocarbon and other hazardous waste material must be appropriately stored onsite, and appropriately transported and disposed off-site. | Ongoing | Construction Contractor | |
| CEMP 82. | | All machinery must contain spill kits. | Ongoing | Construction Contractor | |
| CEMP 83. | | Portable ablution blocks must be stored at least 50 m from retained vegetation. | Ongoing | Construction Contractor | |
| CEMP 84. | | Portable ablutions sewerage must be removed off-site by a licensed carrier. | Ongoing | Construction Contractor | |

### 6.8.3 Contingency actions

Contingency measures for the management of waste are detailed in Table 6-24.

**Table 6-24: Contingency actions - waste management**

| Trigger | Contingency actions |
|---|---|
| Disposal of waste in a manner that harms or is likely to harm the environment | • Investigate cause of incident<br>• Ensure appropriate remediation action is taken<br>• Re-train staff in correct waste management and disposal procedures<br>• Ensure appropriate storage and facilities are available for controlled and general waste. |

# 7. Implementation

## 7.1 Training and awareness

All personnel involved in the construction works (including contractors and sub-contractors) must complete the project induction program, which will advise them of the requirements of this CEMP and other associated management plans, as well as any other specific site requirements, prior to commencing work.

A project-specific environment induction will include key environmental aspects, impacts, risks and controls associated with the Proposal, as well as relevant legislative responsibilities and penalties for failing to meet these responsibilities. A copy of this CEMP will be made available throughout the life of the construction program.

Training needs and competency records are managed through BlueScope's training system, SAP.

Routine toolbox talks will also be conducted on-site, prior to the commencement of work each day, to ensure personnel are aware of project progress, planned works, incidents and other general matters relating to the project, including task outcomes, review of risks specific to the task and ensure necessary safety and environmental controls are understood.

## 7.2 Tracking

Tracking of environmental performance will be undertaken to evaluate performance against the targets and contingency triggers identified in Section 6, as well as to achieve the objectives as listed within Section 6.

NeoSmelt Project has developed a Legal Obligations Compliance Register to record all Environment and Community obligations and commitments associated with the Project to ensure compliance throughout the life of the project.

### 7.2.1 Inspections

The Construction Contractor will undertake regular inspections of the work area to evaluate the effectiveness of environmental controls.

The results of the inspections will be recorded in the BlueScope HSEC Management System MARS. If any maintenance or deficiencies in environmental controls or in the standard of environmental performance are observed, they will be recorded for actioning.

Records will also include details of any maintenance required, the nature of the deficiency, and any actions required and an implementation priority. The completion of the actions will be monitored to ensure they are implemented within the agreed timeframes.

### 7.2.2 Reporting

A range of environmental compliance data shall be maintained by the Project Manager, to be used in annual compliance audits, as required by existing approvals for the site (MS 863).

Reports provided by the contractors may be used as evidence of legal compliance or non-compliance and must be correct and auditable.

Specifically, reporting requirements conditioned under MS 863 require the Project Manager/ Proponent to prepare and implement a Compliance Assessment Plan, approved by the EPA, outlining:

- Compliance reporting frequency;
- Assessment methods (approach and timing);
- Retention of compliance assessments;
- Reporting non-compliance and corrective actions;
- Table of contents of compliance reports; and
- Public availability of compliance records.

Compliance must be assessed in accordance with the Compliance Assessment Plan with records retained and provided on request and any potential non-compliance reported as soon as practicable to the CEO of DWER.

A Compliance Assessment Report must be submitted annually (or as agreed with the EPA), confirming compliance status, detailing any non-compliances and corrective actions, ensuring public availability, and identifying any proposed changes to the plan.

The Project Manager will be responsible for verifying and quality controlling all data reported in relation to site activities. Documentation to be maintained is detailed within Table 7-1.

**Table 7-1: Reporting requirements**

| Aspect | Information required | Format of reporting |
|---|---|---|
| Vegetation and flora | • Date of clearing<br>• Extent and location of all clearing performed<br>• Confirmation clearing was conducted within the designated area. | Vegetation and clearing register (Table A. 1) |
| Fauna management | • Details of incident / interaction with fauna<br>• Fauna pre-clearing inspection and relocation data | • Incident and complaints register in MARS<br>• Fauna relocation report, if required. |
| Heritage | • To be determined in consultation with GKBAC | Incident and complaints register in MARS |
| Dieback and weed hygiene management | • Dieback/ weed hygiene register, including:<br>  ○ Date of vehicle mobilisation to site<br>• Confirmation vehicle is clean and free from a build-up of mud prior to site entry. | Dieback and weed hygiene inspection (Table A. 2) |
| Environmental Incident management | • Date and time of incident<br>• Nature of the incident | • Incident and complaints register in MARS |

| Aspect | Information required | Format of reporting |
|---|---|---|
| | • Actions implemented<br>• Confirmation that the incident / complaint was adequately addressed | |

## 7.3 Roles and responsibilities

### 7.3.1 Project Manager/ Proponent

The primary responsibilities of the Project Manager/ Proponent include:

- Overall compliance with this CEMP and associated approval conditions;
- Act as primary liaison between regulatory agencies (i.e., DWER) and contractors;
- Engage suitably qualified contractors to implement the CEMP as required;
- Review reports provided by the Construction Contractor as required;
- Maintain appropriate records that demonstrate compliance with the CEMP requirements (to support annual audit); and
- Ensure construction contractors are aware of the requirements of the CEMP.

### 7.3.2 Construction Contractor

The primary responsibilities of the Construction Contractor include:

- Comply with the requirements of the CEMP;
- Ensure all site personnel are aware of the requirements of the CEMP and are appropriately inducted;
- Undertake regular inspections to ensure construction workers/ contractors are complying with CEMP measures; and
- Provide relevant records / evidence of compliance with CEMP measures to the Project Manager.

### 7.3.3 Environment Personnel

The primary responsibilities of the Environmental Consultant include:

- Implement and monitor any rehabilitation works that are required to be undertaken as a part of contingency actions
- Provide environmental advice to the Project Manager as requested; and
- Ensure any changes in legislation and guidelines are met by the Project

## 7.4 Incidents and corrective actions

All environmental interactions will be recorded in MARS BlueScope incident management system, along with corrective actions taken to remediate the impact of the incident as appropriate. Contingency actions have been incorporated in this CEMP.

# References

Aboriginal Land Services (ALS), 2025. *Archaeological and Ethnographic Site Identification Heritage Survey of BlueScope's Project NeoSmelt, Patterson Road Rockingham.* Prepared for BlueScope Future Technologies.

Commander, D.P., 2003. *Outline of the hydrogeology of the Perth Region*. Australian Geomechanics 38 (3).

Davidson, W.A., 1995. Hydrogeology and groundwater resources of the Perth Region, Western Australia: Western Australia Geological Survey, Bulletin 142, 257p.

Department of Water and Environmental Regulation (DWER), 2017. *Acid Sulfate Soil Risk Map – Swan Coastal Plain* (DWER-055). GIS dataset.

Environmental Protection Authority (2011) *Report and Recommendations of the EPA (Report 1390) Rockingham Industrial Zone Strategic Environmental Assessment*. Western Australia, April 2011.

Environmental Protection Authority (EPA), 2016a. *Environmental Factor Guideline: Flora and Vegetation.* EPA, Western Australia.

Environmental Protection Authority (EPA), 2016b. *Environmental Factor Guideline: Terrestrial Fauna.* EPA, Western Australia.

Environmental Protection Authority (EPA), 2018. *Statement of Environmental Principles, Factors and Objectives.* EPA, Western Australia.

Environmental Protection Authority (EPA), 2020. *Environmental Factor Guideline: Air Quality*. EPA, Western Australia.

Environmental Protection Authority (EPA), 2023. *Environmental Factor Guideline: Social Surroundings.* EPA, Western Australia

Environmental Protection Authority (EPA), 2023. *Technical Guidance – Environmental impact assessment of Social Surroundings – Aboriginal cultural heritage*. EPA, Western Australia.

Environmental Protection Authority (EPA), 2024. *Instructions: How to prepare Environmental Protection Act 1986 Part IV environmental management plans*. Government of Western Australia.

Harewood, G., 2025. *Fauna Assessment, Miscellaneous Lots, Patterson Road – East Rockingham*, Prepared for BlueScope Future Technologies Pty Ltd, October 2025 V1.

JBS&G, 2025. *Project NeoSmelt – Ecology Site Inspection.* Memo to BlueScope. 27 August 2025

Threatened Species Scientific Committee (TSSC), 2019. Approved Conservation Advice (incorporating listing advice) for the Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain ecological community.

Worley Consulting, 2025. *NeoSmelt DRI-ESP Pilot Plant: Baseline Contamination Assessment*. Prepared for BlueScope Future Technologies.

# Appendix A Management forms

**Table A. 1: Vegetation clearing register**

| Date | Operator | Area cleared (m2) and location (with coordinates) | Within footprint | Comments |
|---|---|---|---|---|
| *30/06/19* | *J. Doe* | *700 $m^2$* | *Yes* | *4 marked trees removed* |
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**Table A. 2: Dieback and weed hygiene inspection**

| **Vehicle Status:** | **Leaving** ☐ | **Entering** ☐ | **Relocating** ☐ |
|---|---|---|---|
| **Name of inspector:** | | | |
| **Date:** | | **Project Area:** | |
| **Equipment/Vehicle Type:** | | **Vehicle # / Registration:** | |
| **Location of last works undertaken by equipment: _____** | | | |

| **Aspects** | **Yes** | **No** | **Comments** |
|---|---|---|---|
| Heavy build-up of dirt? | ☐ | ☐ | |
| Does the vehicle need washing down? | ☐ | ☐ | |