

UrbanGrowth NSW Environmental Management System Overview

This document provides an overview of UrbanGrowth NSW’s Environmental Management System (EMS). It is designed to provide our staff and the people we work with an understanding of their EMS roles and responsibilities.

Why do we have an Environmental Management System?

UrbanGrowth NSW is committed to responsible environmental management and has an EMS to continually improve our environmental performance. Our EMS has been accredited in line with international standard AS/NZS ISO 14001 since 2000.

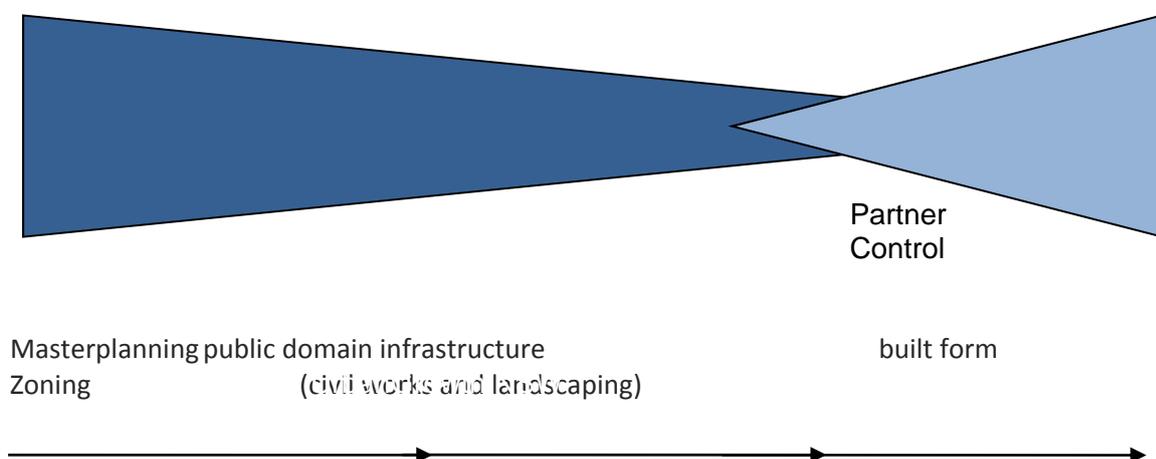
The scope of UrbanGrowth NSW’s EMS covers the development of land throughout Sydney, the Illawarra and Hunter regions and includes the activities of land acquisition, masterplanning, design engineering, marketing and sales. Our registration also covers the systems and processes for the delivery of development projects, including joint venture arrangements with the public and private sectors.

UrbanGrowth NSW’s activities

The activities covered by our EMS relate to UrbanGrowth NSW’s business operations and its role as a land developer. As UrbanGrowth NSW does not typically undertake our own construction or building works, these activities are not included in our EMS. However, but UrbanGrowth NSW does have EMS responsibilities in relation to *how* to we engage and manage the works of others.

Typically we have direct control for masterplanning and rezoning and we deliver public domain infrastructure either directly, or under partnering arrangements with other developers.

Below is a diagram illustrating UrbanGrowth NSW’s typical influence and responsibility in the development of land.



UrbanGrowth NSW's EMS:

The intention of our EMS is to:

1. ensure we have processes to reduce our negative impact on the environment
2. improve our positive influence on the environment and
3. Influence the impacts of those we work with, in particular the Contractors we engage to deliver the public domain.

As with any EMS, a first step involves identifying our 'environmental aspects and impacts'. Environmental aspects are an organisation's activities, products or services that interact with the environment and an impact is the resulting change (for further definition see Table 2 Useful Terms). For example, an aspect related to our maintenance of sites awaiting development is bush-fire hazard control, which causes destruction of native flora and fauna, and the impact is the depletion of biodiversity.

UrbanGrowth NSW's EMS responsibilities are reported publicly in our Sustainability Report. This includes monitoring of Environmental Management Plans (EMPs) prepared by Contractors and the impacts from our office and business activities such as energy, water, paper use and waste.

EMS roles and responsibilities

As a developer, UrbanGrowth NSW's major impact on the environment is the preparation of sites for land development. This includes engaging Contractors to build roads, install infrastructure services and conduct landscaping works. To ensure these services are engaged in a way consistent with our environmental ethic, we require all our sites to have an EMP prepared by the Contractor and we stipulate that activities are managed according to this EMP. In addition we require independent audits to be carried out where works are occurring. We engage Contractors who, as part of their business, also aim to continually improve their environmental management standards.

UrbanGrowth NSW typically sells land or develops it using partnering arrangements with others. We also enter partnering arrangements with builders in the delivery of the built form. These builders are responsible for the management of their construction related environmental aspects and impacts.

UrbanGrowth NSW has a number of projects with Project Delivery Agreements (PDA) partners. In these projects UrbanGrowth NSW does not have a contractual relationship with our partners' Contractors and so their environmental management is not UrbanGrowth NSW's responsibility. The PDA with UrbanGrowth NSW's partners addresses environmental risk management and it is the responsibility of our PDA partners to manage this risk accordingly, including with its Contractors.

Our EMS procedures comprise:

1. UrbanGrowth NSW Environmental Management System Overview
2. EMS Checklist for Development Staff (for internal development staff)

3. Managing UrbanGrowth NSW's Environmental Aspects and Impacts (for Business Support, Projects Coordinator and Sustainability)
4. EMS Certification Audits and Internal Audits (for Sustainability and Policy)
5. UrbanGrowth NSW's Environmental Communication
6. Managing UrbanGrowth NSW's Environmental Legal and Other Requirements
7. Managing Nonconformities, Corrective Actions and Evaluation

The 'EMS Checklist for Development Staff' (Procedure 2) outlines the EMS responsibilities for Development Managers and includes a checklist that can be included on project files.

'Managing UrbanGrowth NSW's Environmental Aspects and Impacts' (Procedure 3) is relevant to the assets we directly manage, including our three offices and any sites that are not yet being developed.

'EMS Certification Audits and Internal Audits' (Procedure 4) outlines the process for the Sustainability Manager to coordinate internal health check audits and the external audits which are a requirement of our EMS certification.

The 'Environmental communication' procedure (Procedure 5) explains the methods used for communicating information relating to environmental requirements, performance and the management system, both internally and externally.

Managing UrbanGrowth NSW's Environmental Legal and Other Requirements' (Procedure 6) procedure explains the steps involved with ensuring that UrbanGrowth NSW complies with legal and other requirements applicable to the environmental aspects and impacts of its operations.

Our 'Managing Nonconformities, Corrective Actions and Evaluation' procedure (Procedure 7) explains the types of Environmental nonconformities that UrbanGrowth NSW can experience and the management response, as well as any related corrective and/ or preventive actions.

The table below lists the EMS roles and responsibilities across UrbanGrowth NSW and the relevant EMS procedures.

Table 1 EMS Roles and Responsibilities

Role	Responsibility	Relevant EMS Procedures
Sustainability Manager	<p>Defined EMS Representative. Ensures UrbanGrowth NSW’s EMS is working appropriately and effectively. Primary EMS contact for our registered certifier.</p> <ul style="list-style-type: none"> Organise internal and external audits and be responsible for the control, maintenance and currency of all EMS documentation, including on the intranet and website. Organise regular training, communication and monitoring of staff, in particular development staff, to improve understanding of EMS responsibilities, and undertake induction training for all new staff. Take responsibility for the management and control of all EMS system records, site audit records and sustainability records. 	<ul style="list-style-type: none"> UrbanGrowth NSW Environmental Management System Overview (Procedure 1) EMS Checklist for Development Staff (Procedure 2) Managing UrbanGrowth NSW’s Environmental Aspects and Impacts (Procedure 3) EMS Certification Audits and Internal Audits (Procedure 4) UrbanGrowth NSW’s Environmental Communication (Procedure 5) Managing UrbanGrowth NSW’s Legal and Other Requirements (Procedure 6) Managing Nonconformities, Corrective Actions and Evaluation (Procedure 7)
Development Managers	<p>Each Development Manager is responsible for the control and maintenance of project-related documentation for their projects including the site-specific Environmental Management Plans (EMPs) and independent third party audits from Contractors. These records must be kept on project files (either electronic or hard copy).</p> <ul style="list-style-type: none"> Ensure all EMS Contractual responsibilities are being met, in particular those Contractors engaged for civil and landscaping works >\$100K. 	<ul style="list-style-type: none"> UrbanGrowth NSW Environmental Management System Overview (Procedure 1) EMS Checklist for Development Staff (Procedure 2) Managing UrbanGrowth NSW’s Environmental Aspects and Impacts (Procedure 3) Managing Nonconformities, Corrective Actions

Role	Responsibility	Relevant EMS Procedures
Development Managers cont.....	<ul style="list-style-type: none"> Ensure all civil works and landscaping Contractors have organised independent audits of their EMP implementation and that these are forwarded to UrbanGrowth NSW. <p>If and when Project Managers or Superintendents are engaged, the development manager must be satisfied with their on-site environmental competencies. The Development Manager must be satisfied with the appropriateness of an EMP and the site’s environmental issues.</p> <ul style="list-style-type: none"> Review audit reports for any ‘areas of concern’ and ‘non-conformance’. In instances where areas of concern or non-conformances have been noted, communicate these with the Sustainability Manager to seek further advice and understand what rectifying actions are needed. 	<ul style="list-style-type: none"> and Evaluation (Procedure 7)
Business Support Manager	<p>The Business Support Manager is responsible for ensuring the electricity, fuel, water and paper use data are captured for our sustainability reporting.</p> <ul style="list-style-type: none"> Identify, assess and ensure effective control over environmental aspects and impacts relating to office based activities. Ensure compliance with the NSW Office of Environment and Heritage requirements for Waste Reduction and Purchasing Policy in our offices and purchasing decisions. 	<ul style="list-style-type: none"> Managing UrbanGrowth NSW’s Environmental Aspects and Impacts (Procedure 3)
Manager Legal	<p>Ensure all contracts reflect the EMS obligations.</p>	<ul style="list-style-type: none"> UrbanGrowth NSW Environmental Management System Overview (Procedure 1) EMS Checklist for Development Staff (Procedure 2) Managing UrbanGrowth NSW’s Environmental

Role	Responsibility	Relevant EMS Procedures
		<ul style="list-style-type: none"> Aspects and Impacts (Procedure 3) • EMS Certification Audits and Internal Audits (Procedure 4) • UrbanGrowth NSW’s Environmental Communication (Procedure 5) • Managing UrbanGrowth NSW’s Legal and Other Requirements (Procedure 6) • Managing Nonconformities, Corrective Actions and Evaluation (Procedure 7)
Property Coordinator	<ul style="list-style-type: none"> • Identify, assess and ensure effective control over environmental aspects and impacts relating to pre-development sites. 	<ul style="list-style-type: none"> • Managing UrbanGrowth NSW’s Environmental Aspects and Impacts (Procedure 3)
Business Development Director	<ul style="list-style-type: none"> • Forward the hand-over report, which includes Due-Diligence and site-specific information to the project team. 	<ul style="list-style-type: none"> • UrbanGrowth NSW Environmental Management System Overview (Procedure 1) • Managing UrbanGrowth NSW’s Environmental Aspects and Impacts (Procedure 3)
Contracts Manager	Contractual conditions reflect the EMS obligations.	<ul style="list-style-type: none"> • UrbanGrowth NSW Environmental Management System Overview (Procedure 1) • EMS Checklist for Development Staff (Procedure 2)

Role	Responsibility	Relevant EMS Procedures
		<ul style="list-style-type: none"> • Managing UrbanGrowth NSW’s Environmental Aspects and Impacts (Procedure 3) • EMS Certification Audits and Internal Audits (Procedure 4) •
Contractors (Superintendents and Project Managers)	Provide to UrbanGrowth NSW: <ul style="list-style-type: none"> • a site specific EMP • reports from independent third party audits • WRAPP reports 	<ul style="list-style-type: none"> • UrbanGrowth NSW Environmental Management System Overview (Procedure 1) • WRAPP report card
Marketing Manager	Process and handle all environmental incidences promptly.	<ul style="list-style-type: none"> • UrbanGrowth NSW Environmental Management System Overview (Procedure 1) • UrbanGrowth NSW’s Environmental Communication (Procedure 5)

Table 2 Useful Terms

Term	Definition
Aspects and Impacts	Element of an organisation’s activities, products or services that can interact with the environment. This includes emissions to air, releases to water, releases to land, use of raw materials and natural resources, use of energy, energy emitted, waste by-products and physical attributes.

Term	Definition
	Impacts are changes to the environment, adverse or beneficial, resulting from the aspects above.
Areas of concern	Arising from an audit, areas that should be addressed for improvement to avoid further escalation.
Contractor/Superintendent/Project Manager	Non-UrbanGrowth NSW personnel who may have primary responsibilities for the site’s environmental management, depending on the project.
EMS	Environmental Management System – part of an organisation’s management system used to develop and implement its environmental policy.
EMP	Environmental Management Plan
External Audit	A condition of our EMS certification. External audits are conducted annually by our certified body, and a certification audit is conducted every three years.
Internal Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organisation are fulfilled
Non-conformance	Arising from an audit where the auditor identifies an action that is highly significant, with potential environmental ramifications, and must be addressed immediately.
Third Party Independent Audit	Audits conducted by independent, third party assessors to monitor our Contractors’ site responsibilities.
PDA	Project Delivery Agreement
Surveillance Audit	Conducted by an independent assessor in addition to the external audits by our certifier (SAI Global).
WMP	Waste Management Plan

Term	Definition
WRAPP	Waste Reduction and Purchasing Policy

ISO 14001 Standard reference	EMS documentation and/or processes
4.1 General Requirements	UrbanGrowth NSW Environmental Management System Overview (Procedure 1)
4.2 Environmental Policy	Sustainability Strategy
4.3.1 Environmental aspects	Managing UrbanGrowth NSW's Environmental Aspects and Impacts (Procedure 3)
4.3.2 Legal and other requirements	Managing UrbanGrowth NSW's Legal and Other Requirements (Procedure 6) EMS Checklist for Development Staff (Procedure 2) Managing UrbanGrowth NSW's Environmental Aspects and Impacts (Procedure 3)
4.3.3 Objectives, targets and programs	Annual Sustainability Report
4.4.1 Resources, roles, responsibility and authority	UrbanGrowth NSW Environmental Management System Overview (Procedure 1)
4.4.2 Competence, training and awareness	Sustainability Induction Staff training records
4.4.3 Communication	UrbanGrowth NSW's Environmental Communication (Procedure 5) UrbanGrowth NSW Environmental Management System Overview (Procedure 1) UrbanGrowth NSW's complaints number on the website
4.4.4 Documentation	UrbanGrowth NSW Environmental Management System Overview (Procedure 1)
4.4.5 Control of documents	UrbanGrowth NSW Environmental Management System Overview (Procedure 1)
4.4.6 Operational control	Managing UrbanGrowth NSW's Environmental Aspects and Impacts (Procedure 3) Critical Incident and Emergency Response Plan
4.4.7 Emergency preparedness and response	Critical Incident and Emergency Response Plan

ISO 14001 Standard reference	EMS documentation and/or processes
	Incident reports
4.5.1 Monitoring and measurement	<p>Annual Sustainability Report</p> <p>UrbanGrowth NSW Environmental Management System Overview (Procedure 1)</p> <p>Managing UrbanGrowth NSW's Environmental Aspects and Impacts (Procedure 3)</p> <p>Managing UrbanGrowth NSW's Legal and Other Requirements (Procedure 6)</p>
4.5.2 Evaluation of compliance	<p>Managing UrbanGrowth NSW's Legal and Other Requirements (Procedure 6)</p> <p>Annual Sustainability Report and review by the Audit and Risk Committee and biannual Management Review</p>
4.5.3 Non-conformance, corrective and preventive action	<p>Managing Nonconformities, Corrective Actions and Evaluation (Procedure 7)</p> <p>EMS Checklist for Development Staff (Procedure 2)</p> <p>Managing UrbanGrowth NSW's Environmental Aspects and Impacts (Procedure 3)</p> <p>EMS Certification Audits and Internal Audits (Procedure 4)</p> <p>Annual Sustainability Report</p> <p>Review by the Audit and Risk Committee</p>
4.5.4 Records	UrbanGrowth NSW Recordkeeping Policy
4.5.5 Internal Audits	EMS Certification Audits and Internal Audits (Procedure 4)
4.6 Management Review	<p>Biannual review by the Executive and covers all components of section 4.6 in the standard.</p> <p>Complaints are addressed through the Compliments and Complaints register.</p> <p>The environmental performance, including the extent to which objectives and targets have been met is managed through our publicly available</p>

ISO 14001 Standard reference	EMS documentation and/or processes
	annual sustainability reporting. Environmental legal changes are communicated on the intranet, at staff briefings and by either the Manager Legal or the Environmental Sustainability Manager.

Document Control

UrbanGrowth NSW's EMS documentation for both internal and external documents is controlled through the use of the *Objective* file management system, available to all staff. *Objective* has archiving, search and revision control facilities (including issue date, document status and authorisation).

The seven EMS procedures can be accessed by all UrbanGrowth NSW staff through the intranet. EMS documents are reviewed annually or earlier where changes are identified as needing to be made for reason such as changes to legal and other requirements. Obsolete documents are archived in *Objective*.

UrbanGrowth NSW's website (<http://www.urbangrowthnsw.com.au>) is used to provide documents for external service providers and the community in general. The EMS documents on the website are clearly named and revision dated.

The main EMS documents of external origin are the environmental management plans (EMPs) for projects and the regular independent audits of our contractors, which is a contractual condition for them. These documents are kept as project files in *Objective*.

The Sustainability Manager is responsible for the control, maintenance and currency of all EMS documentation on the intranet and the UrbanGrowth NSW website. All EMS documentation must be authorised by the Operations Manager.

Monitoring and Measurement Activities

UrbanGrowth NSW's commitment to publicly disclosing its environmental and social impact is done through our annual Sustainability Report. We collect information on environmental, social, governance and financial data points across our corporate operations and projects. This includes our significant environmental impacts under the themes of urban water cycle, energy and greenhouse gas emissions, biodiversity and riparian corridors. Our corporate monitoring includes information on our energy, water, fuel and paper use. To ensure the impact of our development projects reflects our significant environmental impacts the comprehensive range of indicators were developed in consultation with our stakeholders. The sustainability reports can be accessed via our website (<http://www.urbangrowthnsw.com.au/>)