



Environmental Management Plan OMBSC

The background of the page is a vibrant, traditional Aboriginal artwork. It features a complex pattern of colorful dots in shades of blue, green, orange, and white, forming various shapes and designs. A prominent orange line winds through the composition, connecting several circular motifs that resemble stylized flowers or sunbursts. The overall style is characteristic of Indigenous Australian dot painting.

Acknowledgement of Country

CDC NSW acknowledges the Traditional Custodians throughout Australia, and their continuing connection to land, waters and community. We pay our respects to all First Nations people, their culture and to Elders past and present.

Artwork: Luke Penrith, *Connecting to Country and People*, 2022

Environmental Management Plan

Version history

Revision history

Revision	Issue date	Author	Changes
V5	25 February 2025	Sandra Reid	Plan updated for 2025

Document approval

	Name	Title	Date
Approved by	Jodie Mallia	General Manager Outer Metro	29 April 2025
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Definitions

CDC's Environmental Management System Framework aligns to ISO 14001 established terms and definitions which are consistently applied throughout the system, including this Plan.

Term	Definition
A/C	Air Conditioning
BCP	Business Continuity Plan
BOAS	Bus Operator Accreditation Scheme
CDC	CDC NSW
CDG	ComfortDelGro
CEO	Chief Executive Officer
EAR	Environmental Aspects Register
EERS	Emission and Energy Reporting System
EMP	Environmental Management Plan
EMS	Environmental Management System
EPA	Environment Protection Authority
GHG	Greenhouse Gas

Term	Definition
GM	General Manager
GM HSEQ	General Manager Health, Safety, Environment and Quality
OMBSC	Outer Metropolitan Bus Service Contract (Region 2, Region 4, Region 8 and Region 11)
HSEQ	Health, Safety, Environment and Quality
IMS	Integrated Management System
ISO	International Organisation for Standardisation
KPI	Key Performance Indicator
LED	Light-emitting diode
NGER	National Greenhouse and Energy Reporting
OCC	Operations and Customer Centre
OHS	Occupational Health and Safety
OTSI	Office Of Transport Safety Investigations
P&E	Plant & Equipment
PESTLE	Analysis of Political, Economic, Social, Technological, Legal and Environmental factors
POEO	Protection of the Environment Operations Act
PRIME	Principal Resource and Information Management System
RACI	Responsible, Accountable, Consulted, Informed
RMS	Roads and Maritime Services
SAS	Service Assurance System
SOP	Standard Operating Procedures
SWOT	Strengths, Weaknesses, Opportunities and Threats analysis
TfNSW	Transport for New South Wales
TMC	Traffic Management Centre
UNSDG	United Nations Sustainable Development Goals
WHS	Work Health and Safety

Compliance table

Schedule 5 Clause	Description	Page in this Plan
7.4	Environmental Plan	
(a)	CDC will develop, implement, maintain, and comply with our Environmental Plan from the Planned Service Commencement Date.	This Plan
(b)	CDC will annually review the Environmental Plan and make such amendments as may be required to ensure ongoing compliance with Law and this Contract.	Page 10
(c)	CDC will prepare and submit to TfNSW a draft of the Environmental Plan covering the relevant forthcoming Contract Year which must:	This Plan
(i)	be generally consistent with or address the environmental system requirements set out in ISO 14001 'Environmental Management System – Specification with guidance for use'; and	Page 9
(ii)	have regard to the need to preserve the Environment and the need to mitigate any adverse effects on the Environment and must ensure all material and consumables used in the performance of the Services are environmentally friendly and kept and disposed of in an environmentally safe and lawful manner	This Plan
(d)	The Operator must publish its Environmental Plan on its website and make it available to passengers, upon request, free of charge	Page 37
(e)	CDC will report on its compliance with its Environmental Plan to TfNSW quarterly in Quarterly Environmental Management Plan Reports in accordance with paragraph 8.6 of this Schedule	Page 11
(f)	If requested by TfNSW, the Operator must demonstrate that it has appropriate environmental management systems in place	Page 10
8.6	<p>Quarterly Environmental Management Plan Report</p> <p>(a) The Operator must provide a report on its compliance with the then current Environmental Plan to TfNSW in accordance with paragraph 4 of this Schedule that details compliance with its Environmental commitments in the Environmental Plan.</p>	Page 11

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1 Introduction

As one of NSW's largest bus transport providers, CDC NSW (CDC) understands our responsibility to provide services in an environmentally responsible and sustainable way. As such, our approach to environmental management is a key part of our overarching sustainability strategy and is consistent with the priorities of Transport for NSW (TfNSW).

We have developed this Environmental Management Plan (EMP) for OMBSC Regions 2, 4, 8 and 11 to deliver practical and achievable environmental outcomes consistent with our ISO 14001 certified Environmental Management System (EMS). We review the EMP to improve the delivery of services and operations across OMBSC, including the strategies, commitments, and actions that we implement to minimise environmental impacts; and maintain compliance with our contractual and legislative requirements, as well as the EMS.

This Plan is developed, implemented, and reviewed to ensure compliance with these requirements from the Service Commencement Date and for the duration of the Contract Term. To do this, we maintain the environmental initiatives across our businesses which support sustainability both within our operations and visibly to our customers and the broader community. This includes publishing the Sustainability Charter on our website and making it available to passengers, upon request, free of charge.

1.1 Scope, purpose, vision

1.1.1 Scope

To ensure CDC remains aware of the context in which we operate, relevant to the scope of the EMP, the Leadership Team performs:

- A PESTLE to analyse political, economic, social, technological, legal, and environmental factors.
- A SWOT to analyse strengths, weaknesses, opportunities, and threats.

These annual reviews ensure CDC plans for the environmental impacts affecting OMBSC and that the EMP and other plans/systems remain current and appropriate for the operating context.

The scope of our EMP is determined by:

- The external and internal issues are determined by the PESTLE and SWOT.
- Compliance regulations.
- The organisational structure.
- The bus services provided.
- Our authority to exercise control and influence.

The EMP ensures that:

- The commitments given at the planning and assessment stage are carried through into our operational delivery.
- Responsibility and accountability are assigned.
- Adequate resources are provided.
- Controls are effective.
- The EMS is appropriately implemented.

1.1.2 Purpose

The purpose of the EMP is to:

- Continually monitor environmental risks and opportunities and our impact.
- Remain alert to emerging risks and changing approaches for their management.
- Maintain a governance regime that ensures delivery of the EMP's intended outcomes.
- Operate in a way that minimises our impact on the environment.
- Make efficient use of physical and financial resources.
- Conserve resources and raw materials.
- Deliver value added products and services.
- Deliver energy efficiencies.
- Reduce both waste and waste disposal costs.
- Use recycled material where possible.
- Ensure alignment with ComfortDelGro's (CDG) global sustainability goal of *"Enabling an Energy Efficient Transport System"*.

1.1.3 Vision

Our vision is to continue to improve our operations, setting new environmental standards and ensuring everyone at CDC plays their role. This is achieved by building an organisation-wide culture that imbues sustainability and environmental care into every aspect of our business and every decision that is made.

CDC embraces continuous improvement which, undertaken responsibly and efficiently, helps create a sustainable future for communities, businesses, and the environment.

We recognise that our business operations consume resources and have a significant impact on the environment. As such, we review, refine, and adhere to the EMP, regulatory frameworks, and CDC's policies/procedures to minimise our impact on the environment.

The EMP guides our team and describes how we deliver this vision including:

- Establishing clear senior leadership commitment to environmental management.
- Minimising harm to the environment.
- Embedding CDC's successful environmental practices and investment history to the environmental demands and requirements of OMBSC.
- Aligning our local programs to recognise CDG's global sustainability goal of *"Enabling an Energy Efficient Transport System"*.
- Delivering our six key strategic themes at a local level (*see the Environmental section*).
- Document the commitments and undertakings that we implement and are held accountable for via reporting and audit programs, as agreed with TfNSW.
- Regularly monitoring environmental risks.
- Remaining alert to emerging risks and changing approaches for their management.
- Setting ambitious objectives and achieving them.
- Making efficient use of our physical and financial resources.

1.2 Interaction with other plans

This Plan is part of CDC’s Integrated Management System (IMS) as shown in [Figure 1](#). The IMS includes a suite of aligned plans, strategies, and policies to achieve the vision and objectives outlined in the TfNSW Future Transport Strategy (2022).



Figure 1: CDC’s suite of plans fits within our Integrated Management System.

The IMS provides guidance on all aspects of CDC’s operations required to deliver consistent, accessible, and high-quality services that minimise environmental impacts where possible. Our Plan has been developed to support our commitments and obligations and to comply with the requirements of ISO 9001 Quality Management, ISO 14001 Environmental Management, ISO 31000 Risk Management, ISO 45001 Safety Management, ISO 55001 Asset Management and with the Bus Operator Accreditation Scheme (BOAS).

1.3 Legislative requirements and related documents

The EMP is compliant with the legislative requirements in [Table 1](#). The EMP is also aligned with other related documents also noted in [Table 1](#).

Table 1: Legislative requirements and related documents.

Legislative requirements	Related documents	CDC Application
National Environmental Protection Council (NSW) 1995	TfNSW environmental goals as laid out in the TfNSW Future Transport Strategy	ComfortDelGro Australia's National Environment and Sustainability Policy with our commitment to the Environment in line with National and TfNSW goals and targets. Environment Plan and Business Plans.
Environmental Law, including but not limited to the Protection of the Environment Operations Act 1997 (NSW) and associated changes covered by Environment Legislation Amendment Bill 2021 and Protection of the Environment Operations (Clean Air) Regulation 2021 of particular note are: <ul style="list-style-type: none"> Section 120 - Pollution of Waters Section 148 - Duty to notify pollution incidents 	United Nations Sustainable Development Goals (UNSDGs) and the three pillars of sustainable development; Economic, Social and Environmental	ComfortDelGro Australia's National Environment and Sustainability Policy with our commitment to the Environment in line with National and TfNSW goals and targets. Environment Plan and Business Plans.
Waste Avoidance and Resource Recovery Act 2001	ISO 26000 Guidance on Social Responsibility	Depots operated under OMBSC adhere to environmental conscious practices. Specifically, these depots are equipped with Wash Bay area fitted with a water and oil separator and recycling system contributing to water conservation efforts. Further details outlined in Table 5 .
Contaminated Land Management Act 1997 (NSW)	ISO 14001: Environmental Management Systems ISO 18504: Soil quality – Sustainable remediation	Regular testing of the integrity of our underground storage tanks (UST) and wells, and above ground tanks (AST). Regular ground water sampling.

Legislative requirements	Related documents	CDC Application
		Monitoring and reporting of diesel spills.
National Greenhouse and Energy and Reporting (NGER) Act 2007	TfNSW Standard reporting processes and documents.	Monthly and quarterly reporting to TfNSW.
Work Health and Safety Act 2011 SafeWork NSW Code of Practice - Managing risks of hazardous chemicals in the workplace (December 2022)	SafeWork NSW CoP - How to manage and control asbestos in the workplace (Dec 2022)	<p>Five yearly reviews and inspections of depots with identified presence of asbestos.</p> <p>Remedial works are undertaken as needed at our depots.</p> <p>Maintenance of an asbestos register for each identified site.</p> <p>Further details on Table 5</p>
	SafeWork NSW Code of Practice - Labelling of workplace hazardous chemicals (December 2022)	<p>Ensuring all our hazardous substances are appropriately labelled and containers replaced as required.</p> <p>Spot checks and inspections are completed periodically to monitor.</p>
	SafeWork NSW CoP - Managing risks of hazardous chemicals in the workplace (Dec 2022)	<p>Hazardous substances are categorised, and relevant chemicals are isolated and stored appropriately. Extraction fans were installed as deemed necessary.</p> <p>Training is provided to workers on the correct use, storage, and disposal of these substances.</p> <p>Hazardous Substances register has been developed at a National level of ComfortDelGro Australia, with current registers also maintained at the local level.</p>

1.4 Governance

The Chief Executive Officer (CEO) of CDC has allocated appropriate resources, including a General Manager Health, Safety, Environment and Quality (GM HSEQ) who is the custodian of the EMS.

CDC's governance structure ensures clear roles and accountabilities for all elements of the EMP including day-to-day implementation and high-level regulatory and contractual compliance. Effective outcomes and governance are achieved through clear articulation of roles and responsibilities,

monitoring, and internal and external reporting. This includes meeting TfNSW’s reporting requirements.

The governance structure ensures our team maintains high standards; meets legislative requirements; and provides strong, responsive oversight of service delivery and operational effectiveness. This structure:

- Is certified under all our ISO accreditations – assuring TfNSW that the highest standards of HSEQ and asset management are ingrained throughout our business and all functions.
- Is maintained through a clear and regimented internal audit and review framework.
- Ensures appropriate, data-informed, and relevant understanding of performance, clear determination of what improvement is required, and strong oversight of change management in line with all legal, compliance and contract requirements.

The GM Outer Metro and Leadership Team are accountable for the effectiveness of the EMS. They ensure the EMP is established, and the objectives and requirements are clearly communicated. They take responsibility for ensuring necessary resources are available, relevant processes are implemented, and continual improvement is promoted while supporting other management activities to achieve our environmental objectives.

Governance is one of the most important factors for ensuring effective environmental and sustainable actions and outcomes. This system employs a practice governance approach (see [Figure 2](#)) with regular meetings attended by the relevant key stakeholders. The structure provides an escalation path for key decision making, dissemination of information and proactive risk management.

Our governance framework has four general aims or objectives – to be effective, equitable, responsive, and robust.



Figure 2: CDC governance approach.

1.4.1 Governance with TfNSW

As shown in [Table 2](#), our governance structure ensures the GM HSEQ and/or CEO and other relevant staff attend the Quarterly Executive Forum and any other meetings as required, from the Service Commencement Date.

We also attend ad-hoc meetings with TfNSW as required, such as specific root cause analysis reviews under performance improvement initiatives, project status meetings, operational meetings, and informal discussions.

Table 2: Meetings and environmental agenda items.

Meeting	Frequency	CDC Attendees	Agenda
Commercial Forum	Monthly	Contracts Manager GM Outer Metro GM Shared Services	Review and discuss environmental activities as they relate to the financial performance of the contract including: <ul style="list-style-type: none"> • Changes to key personnel • Benchmarking results • Budget planning • Contract amendments • KPI results • Audit activities
Service Delivery Forum	Monthly	GM Outer Metro Operational Managers GM Shared Services Contracts Manager	On-going delivery of services required under the contract including: <ul style="list-style-type: none"> • New and outstanding root cause analyses identifying appropriate preventative action. • Post incident review reports • New and existing escalations and plans to resolve. • Recommended improvements to operational processes. • Progress improvement/cure plans • Customer feedback report.
Executive Forum	Quarterly	CEO CDC NSW GM Outer Metro GM Shared Services Contracts Manager	<ul style="list-style-type: none"> • Identify environmental opportunities. • Share achievements and completed activities. • Report progress against EMP commitments • Environmental updates.
Other scheduled meetings	As required	As required	Where governance/other meetings require environmental inputs, CDC ensures attendance by personnel with an appropriate level of expertise and seniority.

1.5 Key roles and responsibilities

Our HSEQ Team is made up of suitably qualified and experienced managers and supervisors working with a dedicated EMS and this EMP. They are complemented by the Asset Management Team, People & Culture Team, and GM Outer Metro.

Consistent with CDC’s commitment to effective environmental management, including our *We Care* framework, and sustainability objectives, all staff have environmental management responsibilities incorporated into their position descriptions. All responsibilities are clearly communicated.

[Table 3](#) provides a RACI Matrix for the EMP, depicting the key tasks and the roles key personnel play in ensuring it is successfully delivered:

- **Responsible** – A manager or team member who is directly responsible for successfully completing a contract task.
- **Accountable** – The person with final authority over the successful completion of the specific task or deliverable
- **Consulted** – Someone with unique expertise and/or insights that is consulted by the team.
- **Informed** – A stakeholder or General Manager who is not directly involved in activities but is kept informed.

Table 3: RACI Matrix – Environmental Management Plan

Responsible	Accountable	Consulted	Informed
R	A	C	I

Task	Role	GM Outer Metro	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Development of CDC's Environmental Management Plan and delivery against targets set		C	A	R	C	R	C		
Monitoring and reporting progress against Environmental Management goals and targets		C	A	R	C	C	C	I	I
Leading, managing, and building CDC's sustainability programs, activities, and initiatives		C	R		C	R	R	R	A
Building our capability and capacity to meaningfully engage and work with communities, partners, and stakeholders		C		R					A
Ensure that all staff receive environmental training that is appropriate to their roles including environmental awareness training		A	C	C	C	R	R	R	
Undertaking onsite environmental audits using an external accredited auditor		C	A	R					

Task	Role	GM Outer Metro	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Investigation of all environmental incidents and risks to actions are taken to rectify		C	A	R	I				
Reporting any significant environmental incidents to appropriate authorities		C	A	R	I				
Ensuring that all facilities are maintained and function in line with the Environment Policy and this Environmental Management Plan including responsible disposal of assets		C	C	I	A				
MOR 6 – Safety performance indicators (Environmental incidents) – reported in the daily/monthly operating report		C	A	R	C				
MOR 7 – Depot Safety and Environmental Inspections		C	A	R	C				
Establish an effective and compliant environmental monitoring program		C	A	R	R				
Develop an enterprise-wide Environmental Management System in accordance with the requirements of ISO14001:2015		C	A	R	C				

Task	Role	GM Outer Metro	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Systematically monitor and reseal any cracks consistent with risk levels within agreed timeframes		C	A	C	C				
Continue to review environmentally friendly bus washing chemicals, appropriate bunding is in place, oil water separator systems are installed with ongoing maintenance plans and water wastage is minimised.		C	A	R	C				
Continue to systematically review remaining onsite sewage systems including septic tanks and assess risk with local government water authority of installed systems in this region and ensure local council inspection and maintenance program is implemented based on risk level		C	C	C	A				
Continue to implement existing procedures to manage environmental impacts and review regularly for any potential gaps or improvements in environmental management of storage, use and disposal of solvents		C	A	R	C				
Continue to review existing arrangements for oil, tyre, and dry waste recycling at all sites in the region identifying any room for improvement and bring these sites in		C	A	R	C				

Task	Role	GM Outer Metro	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
line with overall environmental plan requirements.									
CDC will continue to simplify the Environmental Management System and improve governance. The EMS guides all aspects of environmental management within our operations.		A	R	C	C				
Replace all traditional lighting with LED lighting having an energy efficiency greater than 130 lumens/watt where practicable.		C	C	C	A				
Install solar renewable energy panels where practicable		C	C	C	A				
Upgrade depot surrounds including gardens and grounds to encourage native fauna through the selection of native flora where practicable.		C	C	C	A				
Reduce reticulated water use by establishing a rainwater capture and harvesting system.		C	C	C	A				
CDC will continue to conduct regular waste audits that involves the collection and measurement of various waste types and recycled waste.		C	A	R	C				

Task	Role	GM Outer Metro	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Continue to collate and input energy consumption data into the Australia Government's Emission and Energy Reporting System (EERS) under the National Greenhouse and Energy Reporting (NGER) Act 2007		C	A	C	R				
Reduce, reuse, and recycle program and actions including waste, stormwater, soil, groundwater, energy use and emission objectives		R	C	C	A				
Monitor and maintain controls of Environmental Aspects Register		C	A	R	C			I	I
Review Environmental Aspects Register annually or as required		C	A	R	C			C	C
Stakeholder communications relating to environmental actions and activity		C	C	R	C				A
Maintain and make available Sustainability Transport Charter on the CDC website		C	A	R	C			C	C

1.6 Environmental targets

The *Delivery section* of this EMP details the actions and approach we employ to achieve our environmental management targets including to:

- Deliver value for money by improving the efficiency and yield of fleet and depot assets and prudently balancing financial, environmental, and social sustainability.
- Continually reduce, reuse, and recycle at all levels thereby reducing the carbon footprint of the OMBSC operations on the environment.
- Support zero emissions and roll-out across fleet service vehicles, where possible, as agreed in partnership with TfNSW.

More specifically, the environmental targets outlined in Table 4 provide a measure to determine the effectiveness of the EMS.

Table 4: Environmental targets.

Focus Area	Ongoing Monitoring & Measurement	Annual Targets	Status	Role responsible
Maintain integrity of above ground storage tanks (AST)	<ul style="list-style-type: none"> • Weekly fuel dips or metre reads and reconciliation, monthly. 	<ul style="list-style-type: none"> • Reconcile fuel usage every month, at each depot. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> • Fuel line integrity testing, annually. 	<ul style="list-style-type: none"> • Conduct one fuel line integrity test, at each depot. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> • Fuel tank integrity testing, every 5 years. 	<ul style="list-style-type: none"> • Conduct fuel tank integrity inspection in accordance with inspection and test plan, at each depot. 	Ongoing	General Manager Assets
Maintain integrity of underground storage tanks (UST)	<ul style="list-style-type: none"> • Daily fuel dips or metre reads and reconciliation, monthly. 	<ul style="list-style-type: none"> • Reconcile fuel usage every month, at each depot. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> • Fuel line integrity testing, annually. 	<ul style="list-style-type: none"> • Conduct one fuel tank integrity test, at each depot. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> • Tank integrity testing, annually. 	<ul style="list-style-type: none"> • Conduct one fuel line integrity test, at each depot. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> • Underground fuel storage tank conduct ground water monitoring from ground water monitoring well, six monthly. 	<ul style="list-style-type: none"> • Conduct two ground water samples, at OMBSC008 Katoomba depot only. 	Ongoing	General Manager Assets

Focus Area	Ongoing Monitoring & Measurement	Annual Targets	Status	Role responsible
Improve quality of water discharged to trade waste.	<ul style="list-style-type: none"> Undertake water sampling and analysis, as per trade waste agreement. 	<ul style="list-style-type: none"> Undertake water sampling, at each depot, as per trade waste agreement. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> Maintain trade waste agreements, at identified depots. 	<ul style="list-style-type: none"> Maintain currency. 	Ongoing	General Manager Assets
Improve quality of recycled water.	<ul style="list-style-type: none"> Monitor recycled bus wash water for legionella, quarterly. 	<ul style="list-style-type: none"> Undertake four water samples, at each depot. 	Ongoing	General Manager Assets
Reduce metered water consumption.	<ul style="list-style-type: none"> Capture, harvest, and recycle rainwater. 	<ul style="list-style-type: none"> Utilise rainwater tanks and seek opportunities to install additional tanks. 	Ongoing	GM Procurement - National
Management of material storage to improve site safety and prevent spills into sensitive areas.	<ul style="list-style-type: none"> Inspect depot to verify material is appropriately stored and emergency response equipment is available, quarterly. 	<ul style="list-style-type: none"> Undertake four safety and environment workplace inspections, at each depot. 	Ongoing	HSEQ Advisor
Reduce electric energy consumption for non-ZEB consumption.	<ul style="list-style-type: none"> install LED lights, solar lights, motion sensors and/or timers. 	<ul style="list-style-type: none"> Assess lighting requirements at time of replacement and/or for new installs. 	Ongoing	Sustainability Procurement Manager
Reduce all forms of waste through recycling.	<ul style="list-style-type: none"> Monitor volume of waste disposed and/or recycled. 	<ul style="list-style-type: none"> Utilise existing arrangement and monitor changes in waste streams. 	Ongoing	GM Procurement - National
Responsible fossil fuel energy consumption.	<ul style="list-style-type: none"> Monitor diesel consumption, monthly. 	<ul style="list-style-type: none"> Undertake twelve measurements of litres of diesel/100km consumed. 	Ongoing	General Manager Assets
Reduce impact on air quality.	<ul style="list-style-type: none"> Maintain robust maintenance 	<ul style="list-style-type: none"> Vehicles serviced as per service 	Ongoing	General Manager Assets

Focus Area	Ongoing Monitoring & Measurement	Annual Targets	Status	Role responsible
	program for vehicles.	plan, at each depot		
	<ul style="list-style-type: none"> Clean fleet accreditation is maintained, yearly 	<ul style="list-style-type: none"> Clean fleet accreditation certificate is attained and current. 	Ongoing	General Manager Assets
Accredited Environmental Management System.	<ul style="list-style-type: none"> Maintain a robust environmental management system. 	<ul style="list-style-type: none"> ISO14001 certification remains current. 	Ongoing	HSEQ Specialist
Management of known asbestos	<ul style="list-style-type: none"> Maintain and review asbestos register and management plan, 5 yearly. 	<ul style="list-style-type: none"> Review register and management plan in accordance with review dates, at each depot. 	Ongoing	HSEQ Specialist

A key element in assuring the effectiveness of our approach to environmental management is the commitment and public accountability of our most senior leadership. Consistent with this, CDG publishes an Annual Sustainability Report to:

- Outline achievements from the preceding year
- Detail our commitments to driving sustained performance improvement.

The CDG Environmental Sustainability Plan includes consistent allocation of funding, inclusion of environmental performance in staff position descriptions, and internal and external performance reporting.

Our Leadership Team drives organisation-wide continuous improvement in environmental management performance.

This EMP identifies the key environmental issues associated with our activities and provides strategies for managing them effectively.

1.7 Monitoring and reporting

1.7.1 Monitoring

CDC is committed to continuously improving our environmental performance, ensuring it evolves in line with the changing legislative landscape; the environmental demands of OMBSC; and the requirements of the customer, the community and TfNSW.

The Shared Services Team is responsible for monitoring all key performance indicators (KPI) and metrics supported by data scientists and analysts. This team measures performance against agreed KPIs, analyses outliers and reports findings directly to the GM HSEQ and/or GM Outer Metro to support data-led decisions.

CDC sees a clear link between measuring environmental performance and the development of an environmentally aware culture.

At CDC, objectives and targets are shared, aligning all levels of the organisation. Performance targets provide goals for all staff and have a significant impact on guiding focus and establishing desired behaviours. Empowered with information, staff make decisions and confidently drive performance.

To ensure that our agreed strategic objectives and obligations are met and that anticipated benefits and outcomes are realised, CDC has adopted and embedded a comprehensive performance monitoring framework.

An annual review of the EMP is undertaken and provided to TfNSW 40 Business Days before the commencement of each contract year. This ensures the EMP is:

- Consistent with or addresses the system requirements set out in ISO 14001
- Cognisant of the need to preserve the environment and mitigate any adverse effects from operations.
- Cognisant of the need to ensure all material and consumables used in the performance of the services are environmentally friendly and kept and disposed of safely and lawfully.

1.7.1.1 Performance data

Data inputs are collected by leading technologies used by our team and managed through the Principal Resource and Information Management System (PRIME) and IMS. Outputs, including metrics and performance results, are available to users for analysis, continual improvement, and real-time decision-making. They are collated for analysis at pre-determined frequencies and on request.

While robust, the reporting framework remains responsive. Data can be extracted at various points on demand. Responsibility for reviewing, analysing, reporting, and presenting metrics is allocated and known.

CDC acknowledges the lead and lag indicators prescribed within the TfNSW daily/monthly operational report (contained in Schedule 5) and implements systems to monitor and report on these as required.

1.7.1.2 Performance indicators and impact on culture

Lead indicators set clear expectations for CDC and our staff. Communication of objectives and targets at all levels of the organisation and visibility of the metrics promote information sharing and reporting while also offering transparency and increasing the level of active participation towards the target.

Environmental/sustainability indicators assist in creating an understanding of what systems, processes and programs are working well and/or are not working. They also provide an early indication of the need to take immediate action. Reflecting this, work teams remain flexible and responsive to lead indicator data and are empowered and encouraged to share innovative ideas and solutions.

Our strong sense of teamwork is solidified through the recognition and celebration of our efforts and success. CDC celebrates the attainment of targets and acknowledges the effort, commitment, and participation of all those who contributed through several mechanisms.

1.7.1.3 Monitoring KPIs with TfNSW

CDC reviews performance against KPIs to ensure our actions are realised and cost reductions achieved. CDC commits to the following specific KPIs relevant to the implementation of the EMP:

- MOR 6 – Safety performance indicators (e.g. environmental incidents) – notifiable environmental incidents (e.g. Environment Protection Authority (EPA))
- MOR 7 – Depot Safety and Environmental Inspections.
- Those outlined in Table 4: Environmental targets.

1.7.1.4 Internal monitoring – environmental monitoring program

CDC has an established, effective, and compliant environmental monitoring program which is implemented in OMBSC in accordance with Table 5.

Table 5: Descriptions of monitoring compliance for environmental impacts.

Monitoring element	Description
Trade wastewater	An independent and suitably qualified party completes annual (minimum) sampling (or more frequently as specified). Results are provided to the relevant water authority or local council.
Groundwater quality	CDC conducts six-monthly sampling from monitoring wells. Samples are analysed to confirm no residual contamination from fuel tanks or associated systems.
Waste management	Waste masses are recorded by category and reported to the Leadership Team with the goal of making annual incremental reductions.
Greenhouse gas emissions from operation	Greenhouse Gas (GHG) emissions from bus operations are recorded and opportunities are explored to reduce these emissions consistent with KPIs agreed with our global head office.
General monitoring	General monitoring includes: <ul style="list-style-type: none"> • Quarterly workplace inspections • Ad hoc observations • Incident reports

1.7.1.5 Internal and External Audit Program

CDC acknowledges our obligation to participate in programmed external audits to maintain the currency of held certifications and implements a layered and robust program of internal audits.

CDC’s audit programs, as they relate to environmental management, align with the requirements of ISO 14001, BOAS and Clean Fleet Accreditation of NSW Roads and Maritime Services (RMS). Audits present an opportunity to challenge our current processes, practices, and benchmarks as we maintain a continuous improvement mindset. They also help identify opportunities and hazards and assess risk.

The environmental audits verify the appropriate use of the EMS, ensuring documentation complies with legislative, accreditation and contract requirements.

Risk audits identify any flaws in our critical control framework, focusing on critical activities.

The HSEQ Team maintains oversight of the internal monitoring and audit program. The program consists of internal (compliance) audits, critical risk review audits and workplace inspections. The program is developed annually, and the program and roles of personnel are communicated to staff.

Certified professionals are engaged to conduct external audits to ensure that CDC is held accountable to standards/criteria or a nominated certification or accreditation framework. Detailed and independent assessment helps identify any otherwise unknown issues and corrective actions.

Audits are monitored, with identified gaps reported on and included in the risk register. Audit results are traceable and documented/communicated to management and relevant teams. Any non-conformities are systemically addressed.

Objectives

The key objectives of CDC's audit program are to evaluate whether:

- The EMS is effective at eliminating or reducing environmental impacts/risks and complies with legislation, certification, and contractual requirements.
- Our critical control framework is effective, and each control layer is robust, known, understood, and performing as intended.

Outcomes and review

Audits are conducted with the aim of providing an objective and impartial outcome. Outcomes are documented and communicated to relevant stakeholders using existing consultative and/or communication arrangements.

Records of the audit and subsequent communication are maintained as appropriate.

To ensure management level review, and adherence to audit schedules and programs, including the overall results, concerns, and any trends, are reviewed by the Leadership Team at the monthly Safety Steering Committee Meeting.

1.7.2 Reporting

To ensure we are accountable for meeting the objectives set out in the EMP, CDC reports to TfNSW on our compliance in our Quarterly Environmental Management Plan Report. This Report details:

- The activities completed against the environmental action plan(s)
- Notifiable environmental incidents in accordance with legislative requirements
- Depot environmental inspections
- Relevant elements of the annual audit
- Our performance mapped to both the goals on the TfNSW Sustainability Plan and the relevant UNSDGs
- Global reporting KPIs as they relate to renewable, and non-renewable energy consumption, GHG emissions, water use (withdrawal), and importantly waste management performance.

TfNSW will receive this report within 10 Business Days of the start of each Contract Quarter of the Service Term.

In the event of an incident and depending on the severity CDC will report to TfNSW in accordance with the Contract clause 11. Incident Management. For *Major* and *Significant incidents* as described in the Contract, CDC will follow the First Five Minute Protocols followed by the Interim Status Update Timeframe.

Written notification will be provided within the Bus Incident Management Database (BIMs) within 72-hours.

Minor incidents will be reported to TfNSW through the Daily Operations Report.

1.8 Continuous improvement

CDC's continuous improvement framework (Figure 3) works in conjunction with the risk management framework to identify opportunities for improvement including the effective and seamless implementation of initiatives to achieve outcomes.

Site-specific risk assessment/control measures ensure all environmental impacts are identified and managed. Assessments include potential environmental risks/impacts at each depot, including structures and activities taking place.

1.8.1 Non-conformance and corrective actions

CDC identifies non-conformance through a wide range of channels. These include on-road accident and incident investigations, near-miss reporting, hazard identification, customer complaints, internal and external audits, workplace inspection regimes, consultation meetings, management reviews and general observations.

Non-conformances are assessed based on risk and categorised into three levels:

- Minor
- Major
- Extreme

The maximum time frames for implementation are pre-determined for the agreed corrective or preventative action. Non-conformities are also identified through:

- Data collection and analysis
- Reports from customers, staff, stakeholders, interested parties or TfNSW
- Formal and informal observations

Any non-conformity is placed in the improvement register and managed through the risk-based change management framework (see *Change section*). This section outlines:

- Reviews of non-conformities
- Causes of non-conformities
- The likelihood of similar non-conformities
- The potential impact of the non-conformity

1.8.2 Continuous improvement framework

CDC drives continuous improvement in all operational areas by implementing the continuous improvement framework shown in Figure 3.

CDC’s commitment to continually improving our systems, processes and performance is managed through an iterative Plan, Do, Check, Act methodology. This methodology supports the principles and practices of continuous improvement, aligns with the requirements of ISO14001 and has been customised to meet the needs of CDC’s operations.

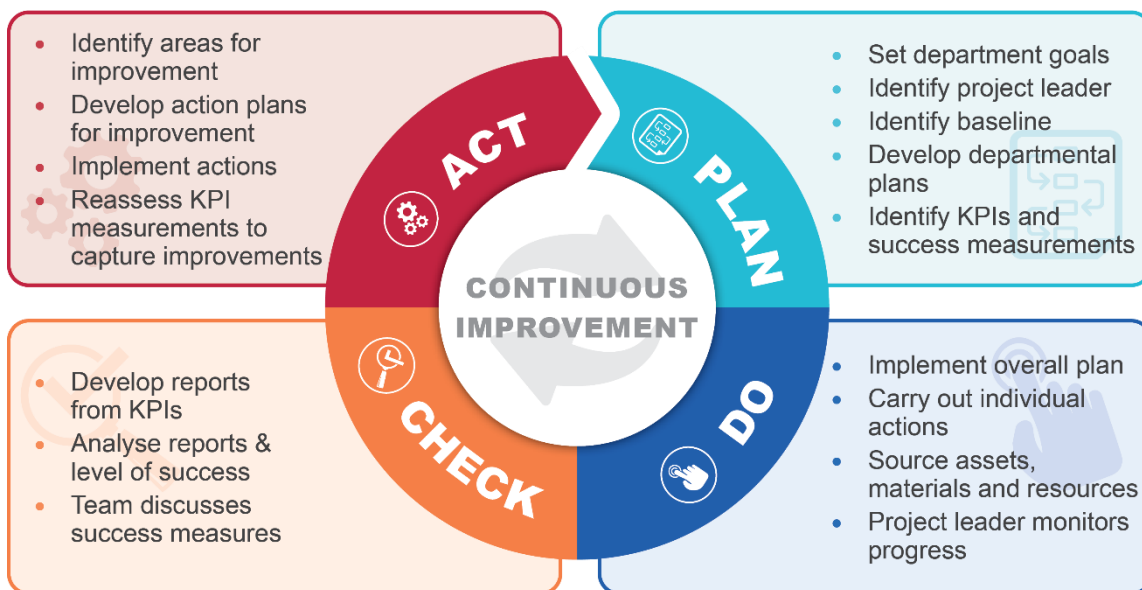


Figure 3: CDC’s continuous improvement framework.

1.8.3 Change management

CDC understands the importance of correctly managing and embedding change. We have developed a robust approach to change management that aligns with and supports our continuous improvement framework and our overall approach to minimising risk and improving services.

Figure 4 provides an overview of our structured approach, highlighting the ongoing consultation with key stakeholders and the use of data systems to monitor and analyse actions throughout the entire process.

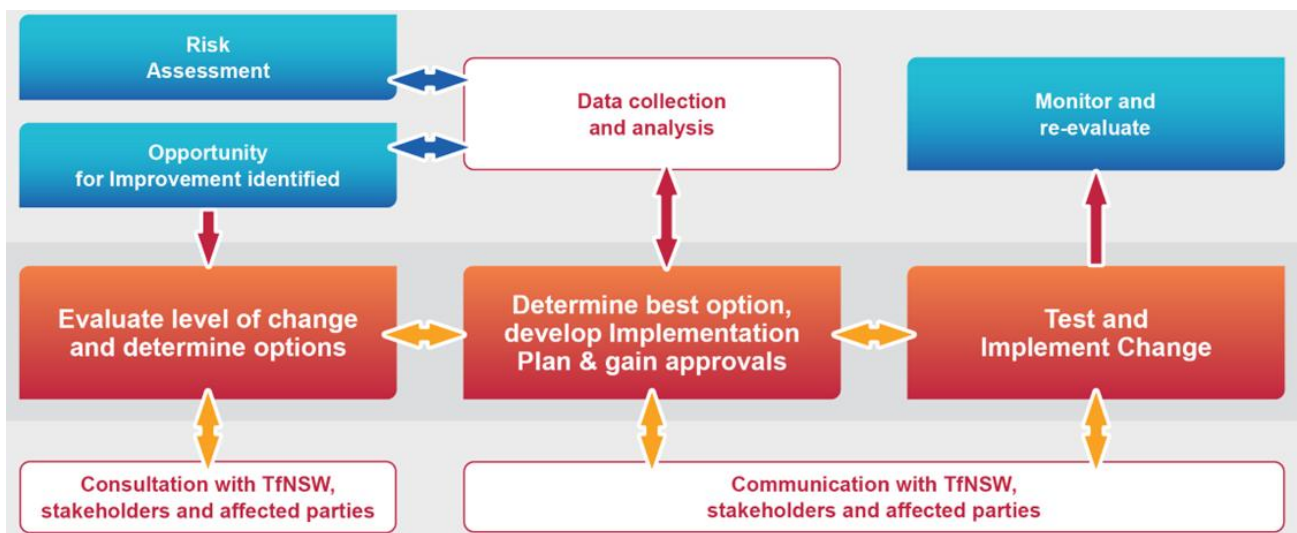


Figure 4: Change management process.

1.9 Document control

The EMP has been prepared in alignment with ISO 9001 and ISO 14001. To maintain this standard, CDC continuously improves, adapts, and amends the EMP to ensure it reflects:

- The OMBSC operational environment including services, risks, and community profile/customers.
- Legislative/regulatory changes
- OMBSC contractual requirements
- Best practice sustainability and environmental management principles
- Lessons learned

A minimum annual review of the EMP is undertaken in consultation with TfNSW and relevant stakeholders. The EMP is also reviewed and updated:

- If an event occurs that identifies the EMP is deficient
- If a new risk has been added or changes have been made to a relevant risk assessment/operational context
- If there is a change to relevant legislation, laws, or regulation
- Following a relevant change to the contract
- Following a relevant change in CDC policy
- Following the recommendations of any relevant audit

2 Delivery

This section outlines CDC’s delivery strategies to ensure we meet our contractual and legislative requirements while promoting robust sustainability and environmental management outcomes including reducing the impact of our operations.

The section is organised in the following key areas:

- EMS framework
- Strategies and policies
- Risk management approach
- Training
- Communication and stakeholder engagement
- Environmental emergency preparedness.

More detail is provided on each below.

2.1 EMS framework

CDC’s EMS framework, depicted in Figure 5, forms part of our IMS and manages all elements of the EMP.

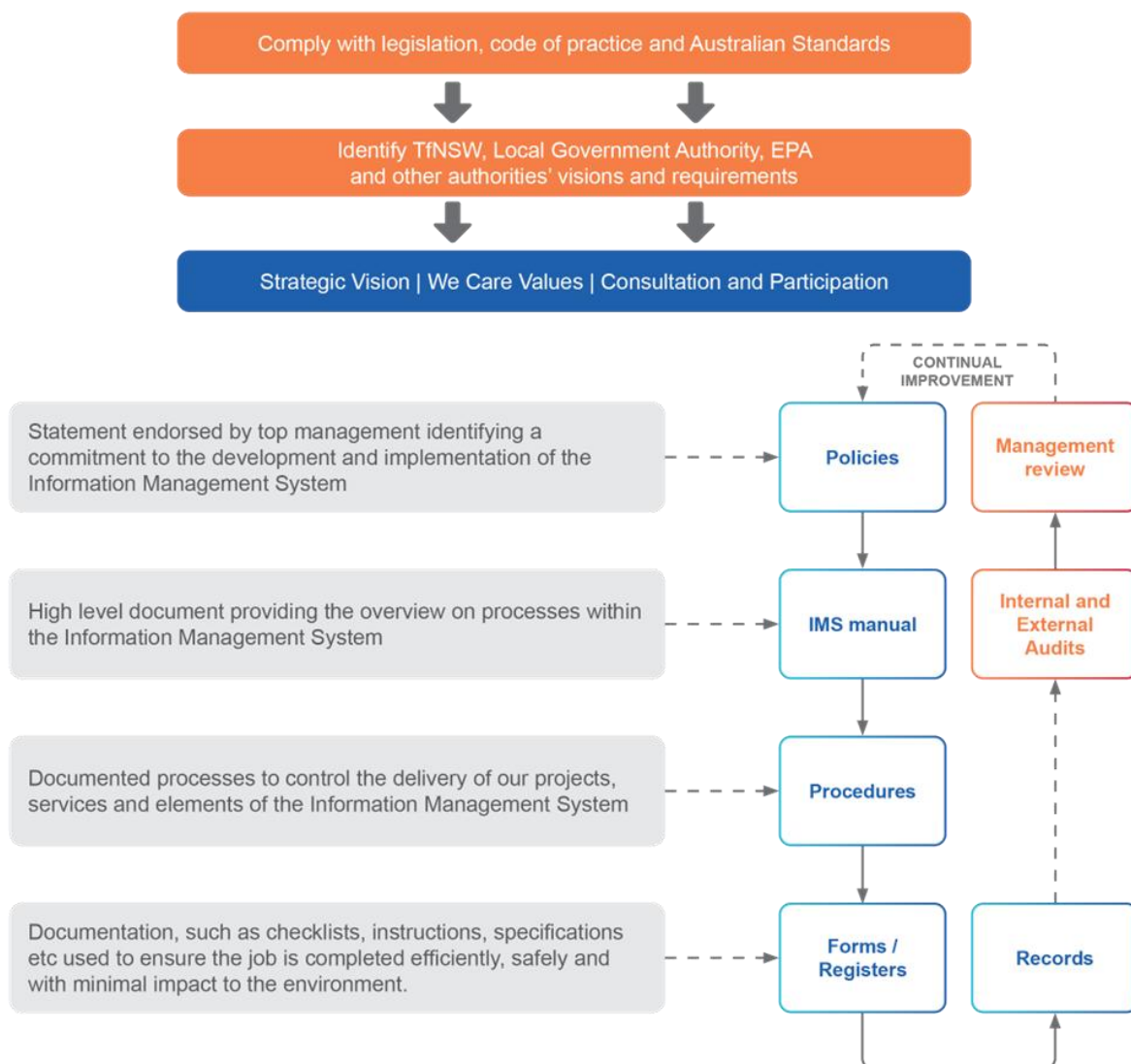


Figure 5: EMS framework.

Key features of the EMS include that it:

- Is designed to improve environmental outcomes.
- Exceeds our statutory obligations pursuant to environmental law, including but not limited to the Protection of the Environment Operations (POEO) Act 1997 (NSW).
- Meets the requirements of the applicable elements contained within TfNSW’s RMS SMS Handbook.
- Is aligned to TfNSW Sustainability Goals and UNSDGs, ISO 26000 Guidance on Social Responsibility and ISO 20400 Sustainable Procurement.
- Certified and aligned to ISO certification standards and schemes, as shown in **Error! Reference source not found.6.**

Table 6: CDC maintains the following certifications and accreditations to support our environmental performance.

Accreditations
ISO 14001: 2015 Environmental Management System
ISO 55001: 2014 Asset Management System
ISO 45001: 2018 OHS Management System
ISO 9001: 2015 Quality Management System
Bus Operator Accreditation Scheme (RMS)
Advanced Fatigue Management Accreditation National Heavy Vehicle Regulator
Clean Fleet Accreditation (RMS)

2.2 CDC strategies and policies

Working with TfNSW, CDC executes strategies to reduce our environmental footprint including adopting new technologies. This includes consistency with *The CDC Way* and *We Care* framework.

CDC’s strategic approach and policies are driven by our clear objectives, shared with TfNSW, of achieving a transport system that is economically and environmentally sustainable, affordable for customers and supports emissions reductions. Our Environmental Sustainability Policy outlines how we achieve our objectives and establishes goals and performance indicators, which direct our behaviour.

2.2.1 The CDC Way

The CDC Way, outlined in Figure 6, recognises the importance of aligning our people, tools, technology, and processes to provide exceptional customer experiences for all customers while minimising our impact on the environment.

It underpins our approach and depicts how these three core components integrate seamlessly to deliver best-in-class services for our customers.

Through training, onboarding, and establishing a strong culture of excellence in our people; ensuring a zero-harm mindset towards safety and the environment; managing our assets; and testing our buses and systems, we deliver outstanding outcomes that reduce GHG emissions and waste while protecting the natural environment.

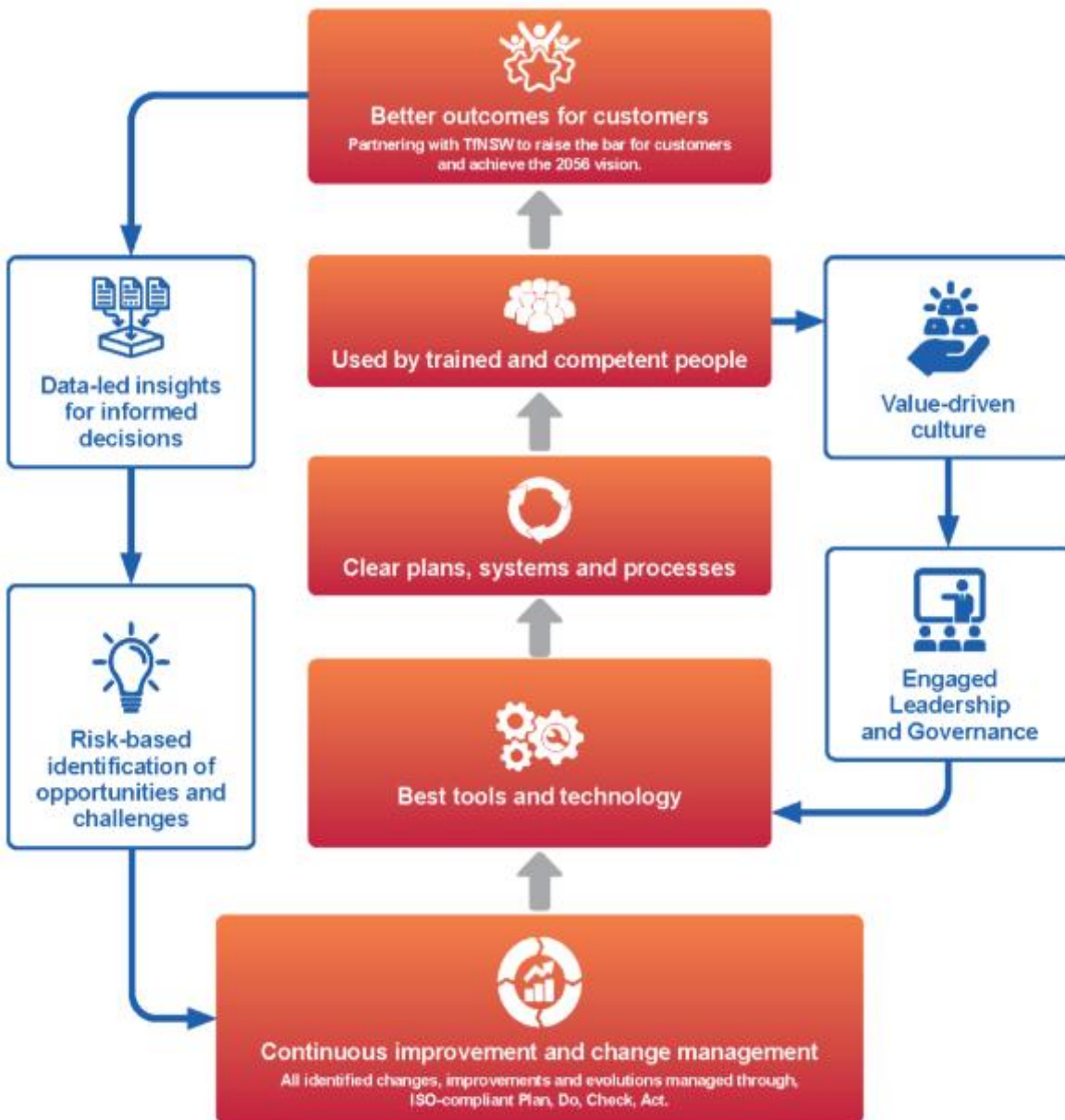


Figure 6: *The CDC Way*.

2.2.2 We Care framework

Our *We Care* framework (shown in

Figure 7) is integral to ensuring high levels of satisfaction amongst customers as well as driving environmental management outcomes and performance.



WeCare

CDC prides itself on creating strong partnerships and aims to be an Employer of Choice, striving to deliver best-in-class service to our customers. We are committed to improving transport solutions and helping protect the environment by embracing sustainable practices for the benefit of local communities. Our corporate value "We Care" is at the heart of everything that we do, and we strive to be the Australia's most trusted transport provider.

We Care VALUES

-  Integrity
-  Authentic
-  Inclusive
-  Positive
-  Purposeful

We Care for our customers



Our customers are always the front and centre of what we do. We are committed to providing transportation services that are safe, reliable, and efficient. We recognise the existing and future needs of our customers and the communities we serve every day.

We Care for our partners, suppliers, and stakeholders



We practise win-win partnerships with our partners, suppliers and stakeholders. We recognise the importance of long term, mutually sustainable relationships. As a trusted business partner, we commit to providing high standards of service delivery. With our suppliers, we commit to dealing fairly and ethically.

We Care for our people



Our people are our greatest asset. The health, safety and well-being of our people is our top priority. We are committed to providing a positive work culture and promoting a safe working environment. We foster diversity and inclusion, dignity, and respect. Our success is achieved through our team of passionate employees with a spirit of teamwork and collaboration, committed to excellent service delivery.

We Care for our communities and the environment



We respect the people in our communities and promote care for the environment by embracing sustainable practices across our businesses. We foster an environment of trust by engaging the communities we serve and supporting initiatives that provide a broader benefit to society. We are committed to minimising the environmental impact of our operations and promoting sustainable transportation outcomes.

We Care for our shareholders



We are committed to generating value for our shareholders. We recognise that sustainable long-term value for our shareholders is built through continually recognising and acting on opportunities that have a positive financial impact supported by our internal and external

stakeholders. This is achieved by making life better for our customers and communities, investing in our employees and in strong partnerships with our partners, suppliers, and stakeholders. We also commit to transparency and effective engagement with our shareholders.

CDC NSW

Figure 7: CDC's We Care framework ensures we provide exceptional service to customers while protecting the environment and communities in which we work.

2.2.3 Environment and Sustainability Policy

Our Environment and Sustainability Policy confirms CDC's commitment to minimising our environmental footprint; driving continuous improvement in our environmental management and sustainability standards; and ensuring that our efforts reflect the expectations of our customers, other road users and the communities we serve. This commitment is endorsed by ComfortDelGro Australia's Chief Executive Officer and CDC's NSW CEO and is made publicly available.

In honouring our commitment, CDC:

- Comply with all environmental legislation and regulations.
- Meet and where reasonably practicable, exceed the relevant environmental standards.
- Work in partnership with our stakeholders and other organisations to implement a more sustainable transport policy and help create an integrated transport system.
- Develop environmental objectives and targets and implement programs to achieve them.
- Promote environmental awareness among our employees through "Reduce, Reuse and Recycle" programs.
- Provide information, instruction, training, and supervision to implement and support our people to fulfil their duties and responsibilities.
- Encourage our people to become involved in environmental management and use correct methods to minimise resource consumption and control waste materials.
- Identify materials, processes and products that cause or may cause pollution, and promote measures to avoid, reduce or control where technically and economically viable.
- Gather and track our energy consumption patterns to verify our energy-saving installations and identify opportunities for continuous improvement and preventative maintenance.
- Adopt a systems and life-cycle approach to manage the impacts and aspects associated with the design of our premises, our operations and the procurement of equipment and assets.
- Provide regular reports on our environmental performance to our stakeholders through our Sustainability Reports.
- Assess potential contractors and suppliers for compliance with environmental legislation and standards and encourage successful contracting organizations to adopt environmental performance standards that accord with this policy.

Complementing the Environmental and Sustainability Policy, additional policies support these commitments by:

- Ensuring our assets are well maintained and operate efficiently.
- Working closely with suppliers to drive environmentally responsible procurement.

Environmental Sustainability Strategies

CDC's environmental strategies cover six key strategic themes:

1. Zero emissions strategy
2. Addressing legacy environmental issues
3. Ensuring compliance with the *Reduce, Reuse, Recycle* approach.
4. Managing environmental risks and opportunities
5. Ensuring responsible procurement
6. Creating a culture that considers environmental impacts in every decision and every action.

2.3 Risk management

CDC responsibly manages risk on a day-to-day basis throughout the contract term applying our ISO31000-compliant risk methodology (Figure 8) which forms the basis of ongoing assessment.

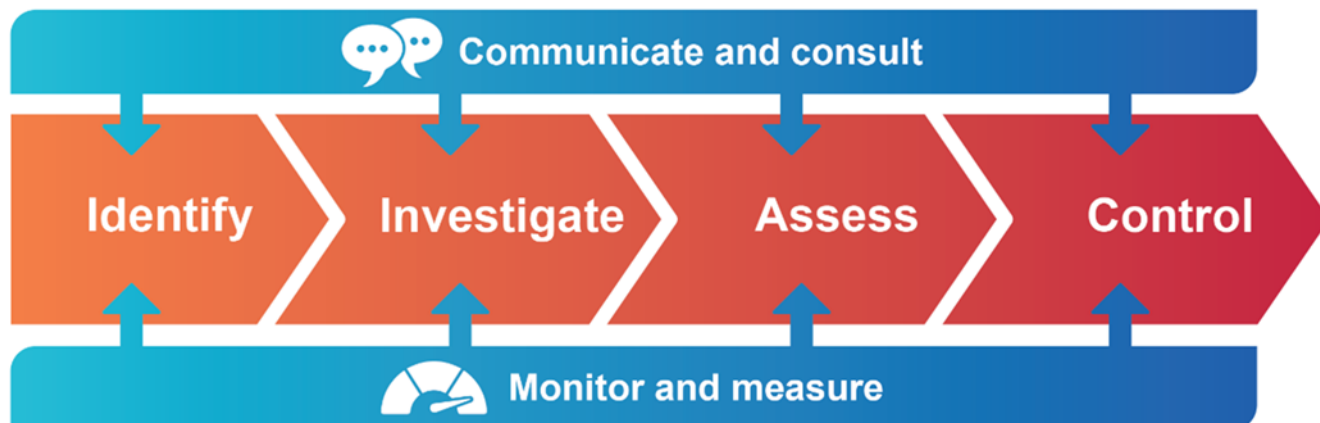


Figure 8: Risk management framework.

2.3.1 Service assurance

CDC's Model Risk Register, maintained and reviewed by the Leadership Team, identifies critical risks, and defines the essential controls and behaviours to manage the risk. Local hazard registers are maintained to capture localised and site-specific risks.

Risk findings and controls are captured and monitored through the CDC's Service Assurance System (SAS). CDC has established several supporting registers:

- Unplanned Event Register – used for all on-road accidents, in-depot incidents, near misses and complaints.
- Improvement Register – aligned to ISO 45001, used to capture results from management reviews, audits, and inspections.
- Hazard Register – used to capture localised hazards reported both on-road and in depot.
- Environmental Aspects Register (EAR) – used to identify the environmental aspects and implement and monitor risk controls

2.3.2 Risks in day-to-day operations

A Risk and Opportunities Assessment was conducted for each OMBSC region which details our principal environmental risks and opportunities in the region. This includes the controls and mitigations that we have established to manage these risks. These risks have been integrated into the overall HSEQ Risk Register for consistent implementation.

Table 7: Risk and opportunity assessment for Outer Metropolitan Regions 2,4, 8 and 11

Category	Risk event	Regions Affected	Uncontrolled Risk (UR)			Proposed mitigation	Residual Risk (RR)		
			Likelihood	Severity	Rating		Likelihood	Severity	Rating
1	Fuel or other hazardous chemical leakage as result of ineffective storage and/or handling.	Regions 2, 4, 8 and 11	2	3	Medium	<p>Mitigations to reduce the likelihood of event occurring:</p> <ul style="list-style-type: none"> Fuel and other chemicals stored and handled in accordance with NSW SafeWork’s Code of Practice – Managing Risks of Hazardous Chemicals in the Workplace and relevant Australian Standards. In accordance with AS 1940: Storage and Handling of Flammable and Combustible Liquid: <ul style="list-style-type: none"> Fuel and other chemicals are stored away from incompatible materials, to reduce the risk of hazardous reactions occurring during storage. Designated storage, cabinet and facilities provided and maintained for all designated hazardous and chemicals. Correct labelling of tanks, storage, and containers, using warning placards and outer warning placards and display of safety signs Maintain fuel tanks and bowser facilities as per the manufacturing requirements to lower the likelihood of localised fuel spills or overflows. Undertake inspections of facilities to ensure chemicals and substances are appropriately stored, in good condition. Spill kits are checked to ensure they are stock up to a reasonable level. Employees trained in application of relevant SOPs relating to handling hazardous, dangerous chemical and spill controls. <p>Mitigations to reduce the impact of an event:</p>	1	3	Low

Category	Risk event	Regions Affected	Uncontrolled Risk (UR)			Proposed mitigation	Residual Risk (RR)		
			Likelihood	Severity	Rating		Likelihood	Severity	Rating
						<ul style="list-style-type: none"> Fuel reconciliations undertaken to ensure no material leakage from tanks. Conduct ground water sampling from groundwater monitoring wells associated with underground fuel storage tanks (applicable Katoomba only). Fire wardens present during operational hours. Wardens are trained in the correct emergency evacuation protocols. These processes are tested bi-annually. Maintain Safety Data Sheet (SDS) registers for all chemicals including fuel, oil stored on site. Registers are accessible for all personnel including contractors and emergency services. Site specific emergency plans developed for all depots and accessible to all staff. Emergency plans tested, to verify appropriate and effective. Employees provided environmental awareness training. 			
2	Fuel or other hazardous material escaping as result of vehicle accident or mechanical failure, resulting in contamination of ground and/or waterways.	Regions 2, 4, 8 and 11	3	3	High	<p>Mitigations to reduce the likelihood of event occurring:</p> <ul style="list-style-type: none"> Maintain buses at a minimum as per the manufacturer requirements to reduce the likelihood of mechanical failure leading to oils or fuels leakages. <p>Mitigations to reduce the impact of an event.</p> <ul style="list-style-type: none"> Ensure appropriate coordination of emergency responses: <ul style="list-style-type: none"> OCC contacted via our private digital radio network to co-ordinate the response. OCC will immediately advice emergency services and TfNSW. 	2	3	Medium

Category	Risk event	Regions Affected	Uncontrolled Risk (UR)			Proposed mitigation	Residual Risk (RR)		
			Likelihood	Severity	Rating		Likelihood	Severity	Rating
						<ul style="list-style-type: none"> ○ OCC will dispatch qualified mechanic to control the potential leakage to drainage. ○ OCC will advise relevant internal stakeholders e.g. HSEQ Specialist and Operations Manager. ● Staff provided training in SOPs for spill control response for on-road events and incidents. ● Staff provided training on responding to emergencies. ● Fire extinguisher available in bus. 			
3	Untreated wastewater discharged into drainage system.	Regions 2, 4, 8 and 11	3	3	Medium	<p>Mitigations to reduce the likelihood of event occurring:</p> <ul style="list-style-type: none"> ● Oil separators installed in all bus wash areas to prevent contaminated wastewater entering waterways. ● Introduce biodegradable and water-based detergents and cleaning products, where practicable. <p>Mitigations to reduce the impact of an event:</p> <ul style="list-style-type: none"> ● Trade waste agreements with local councils are established and maintained. ● Undertake water sampling of recycled water. 	2	3	Low
4	Mishandling of hazardous waste results in adverse environmental impact.	Regions 2, 4, 8 and 11	2	3	Medium	<p>Mitigations to reduce the likelihood of event occurring:</p> <ul style="list-style-type: none"> ● Safety and environment workplace inspections are conducted to check ignition sources remain segregated from hazardous waste. ● Staff trained in application of SOPs relating to handling hazardous, dangerous chemical and spill controls. ● Chemical containers emptied before disposal. ● Only qualified and licenced contractors engaged to collect waste. 	1	3	Low

Category	Risk event	Regions Affected	Uncontrolled Risk (UR)			Proposed mitigation	Residual Risk (RR)		
			Likelihood	Severity	Rating		Likelihood	Severity	Rating
						<ul style="list-style-type: none"> • Appropriate waste bins provided and regularly emptied. Mitigations to reduce the impact of an event: <ul style="list-style-type: none"> • Employees provided environmental awareness training. • Training provided training in SOPs for spill control response for on-road events and incidents. • Staff provided training on responding to emergencies. • Spill containment and firefighting equipment available and inspected for use. • Reduce hazardous waste by following the principle of waste hierarchy identified in the Waste Avoidance and Resource Recovery Act 2001. 			
5	Noise generated from depot operations and maintenance is excessive and results in community resentment.	Regions 2, 4, 8 and 11	3	2	Low	Mitigations to reduce the likelihood of event occurring: <ul style="list-style-type: none"> • Procure plant which meets noise limit guidelines. Mitigations to reduce the impact of an event: <ul style="list-style-type: none"> • Avoid sounding the horn while reversing (only in identified depots at certain times of the day) • Only conduct noisy workshop works during business hours and in accordance with council zoning requirements. • Buses, plant, and equipment maintained at a minimum as per the manufacturer requirements. • Noise assessments undertaken on introduction of any new heavy plant or mechanical infrastructure. 	2	2	Low
6	Operations consume more fossil fuel inputs than required.	Regions 2, 4, 8 and 11	2	2	Low	Mitigations to reduce the likelihood of event occurring: <ul style="list-style-type: none"> • Monitor fuel usage. 	1	2	Low

Category	Risk event	Regions Affected	Uncontrolled Risk (UR)			Proposed mitigation	Residual Risk (RR)		
			Likelihood	Severity	Rating		Likelihood	Severity	Rating
						<ul style="list-style-type: none"> Fit motion sensors or timers to turn off lights that are not in use, where practicable. Remove aged lighting and replace with LED lights. Prioritise procurement of plant and equipment that has higher energy efficiency ratings. Procure zero emission buses as approved by TfNSW and in accordance with contract requirements. Install renewable energy solutions where feasible such as solar panels. <p>Mitigations to reduce the impact of an event.</p> <ul style="list-style-type: none"> Use in bus technology systems to monitor bus idling and actively manages drivers. Buses are maintained as per the manufacturer requirements or better to maximise engine efficiency. Procure or hire electric equipment such as forklifts where possible to reduce dependence on fuel. 			
7	Onsite sewage systems are not monitored or managed resulting in contamination of ground and/or waterways or health and safety hazard for staff, contractors, or visitors.	Regions 2, 4 and 11	2	2	Low	<p>Mitigations to reduce the likelihood of event occurring:</p> <ul style="list-style-type: none"> Assess and where possible plan for decommissioning of existing septic tanks and connection to town sewage system. Maintain trade waste agreements and monitor water quality. <p>Mitigations to reduce the impact of an event:</p> <ul style="list-style-type: none"> Remain informed of any changes to local government water authority requirements. Participate in council inspection program and any action recommendations. 	1	2	Low

Category	Risk event	Regions Affected	Uncontrolled Risk (UR)			Proposed mitigation	Residual Risk (RR)		
			Likelihood	Severity	Rating		Likelihood	Severity	Rating
8	Landfill contamination resulting from incorrect disposal of batteries, scrap metal, paints, oil, or tyres.	Regions 2, 4, 8 and 11	3	2	Low	<p>Mitigations to reduce the likelihood of event occurring:</p> <ul style="list-style-type: none"> Adequate and appropriate waste and recycling collection bins available. Hazardous, liquid waste (coolant, oils, water, and fuels), waste batteries and waste tyres are collected by licensed waste transporters for appropriate disposal. Engage only qualified contractors to collect waste. <p>Mitigations to reduce the impact of an event:</p> <ul style="list-style-type: none"> Reduce hazardous waste by following the principle of waste hierarchy identified in the Waste Avoidance and Resource Recovery Act 2001. 	2	2	Low
9	Environmental contamination from disturbed asbestos containing materials.	Regions 2, 4, 8 and 11	3	3	Medium	<p>Mitigations to reduce the likelihood of event occurring:</p> <ul style="list-style-type: none"> Asbestos Containing Materials (ACM) register and management plan maintained for all identified depots. Asbestos labelled where appropriate. Condition inspections of asbestos onsite. Site works, provision made for planned and safe asbestos removal. <p>Mitigations to reduce the impact of an event:</p> <ul style="list-style-type: none"> Contractors advised of location of asbestos prior to commencing works on site. Depot staff notify HSEQ Specialist and Operations Manager if asbestos is disturbance. Licensed asbestos removal contractors engaged to remove asbestos at depot sites. 	2	3	Medium

2.3.3 Environmental Action Plan

CDC implements an Environmental Action Plan for OMBSC Regions 2, 4, 8 and 11, including structures and activities to ensure all environmental risks are understood and managed. We conduct an environmental audit, review all depot locations and activities, and develop specific actions as detailed in the *Outcomes: Jul 2024 – Jun 2025*

Table 10 below outlines the Outcomes of the initiatives that CDC have planned for 2024.

Table 10: Summary of Outcomes 2024.

Focus Area	Initiative	Status	Role responsible
Management of asbestos containing materials.	<ul style="list-style-type: none"> Systematically monitor condition of asbestos at identified depots. 	<p>Ongoing quarterly environmental and workplace inspections completed as planned. Nil findings related to the management of asbestos.</p> <p>Warning Signage installed in Singleton depot as planned, March 2024.</p>	HSEQ Specialist
	<ul style="list-style-type: none"> Maintain currency of asbestos register and Hazardous Substances/Asbestos management plan, review every 5 years. 	<p>Asbestos Register and Hazardous Material Management Plans reviewed OMBSC002</p> <ul style="list-style-type: none"> Singleton – continue to manage as per recommendations. Thornton – nil asbestos identified. <p>Planning commenced, review asbestos register and management plan at Emu Plains, due July 2025.</p>	HSEQ Specialist

Focus Area	Initiative	Status	Role responsible
		No actions required for OMBSC004 or OMBSC011.	
Mitigate potential contamination from underground fuel tank, Katoomba.	<ul style="list-style-type: none"> All infrastructure upgrade projects will include a review of the asbestos register and, if appropriate, removal of known asbestos. 	Thornton depot, minor works and internal fit, end March 2024. Nil asbestos identified during works.	Facilities Manager
	<ul style="list-style-type: none"> Continue to conduct daily fuel dips to monitor usage and assist in identifying potential seepage. 	Completed daily, ongoing.	General Manager Assets
	<ul style="list-style-type: none"> Undertake six monthly ground water sampling from ground water monitoring wells to identify any potential contamination. 	Inspection completed: <ul style="list-style-type: none"> 27 February 2024 16 September 2024 	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct fuel line integrity testing annually 	Inspection completed: <ul style="list-style-type: none"> 8 April 2024 	General Manager Assets
Mitigate potential contamination from above ground fuel tanks	<ul style="list-style-type: none"> Continue to conduct fuel line integrity testing annually 	Inspection completed: <p>OMBSC008</p> <ul style="list-style-type: none"> Valley Heights, April 2024 Emu Plains, not completed as tank due for replacement Q1 2025. <p>OMBSC002</p>	General Manager Assets

Focus Area	Initiative	Status	Role responsible
		<ul style="list-style-type: none"> • Thornton, not completed as tank due for replacement Q1 2025. • Singleton, June 2024 OMBSC004 <ul style="list-style-type: none"> • Toronto, June 2024 • Edgeworth, June 2024 • Morisset, June 2024 • Halloran, June 2024 	
	<ul style="list-style-type: none"> • Continue to conduct non-destructive storage tank integrity testing every 5 years annually in accordance with inspection and test plan to identify any potential asset failure. 	Inspection completed: OMBSC008 <ul style="list-style-type: none"> • Valley Heights, April 2024 • Emu Plains, not completed as tank due for replacement Q1 2025. OMBSC002 <ul style="list-style-type: none"> • Thornton, not completed as tank due for replacement Q1 2025. • Singleton, June 2024 OMBSC004 <ul style="list-style-type: none"> • Toronto, June 2024 • Edgeworth, June 2024 • Morisset, June 2024 	General Manager Assets

Focus Area	Initiative	Status	Role responsible
		OMBSC011 • Halloran, June 2024	
Optimise existing bus washing processes to improve water quality.	<ul style="list-style-type: none"> Continue to conduct water quality testing to monitor quality of water discharged as per trade wastewater agreements. 	Ongoing testing completed as planned. During routine testing undertaken in Q1 2024, high levels of COD (Chemical Oxygen Demand) were detected in water/sludge removed from underground waste pits, at Morisset and Toronto depots. New process introduced at all depots. Waste sludge removed, separated from water. Disposed by licenced contractor as waste oil. No further issued reported.	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct water testing for legionella to monitor quality of water reused for bus washing, quarterly. 	Ongoing testing completed as planned. During routine testing undertaken in Q2 2024, a positive legionella count was identified at Toronto. Remedial action was taken as recommended by contractor. Secondary follow up testing provided	General Manager Assets

Focus Area	Initiative	Status	Role responsible
	<ul style="list-style-type: none"> Review and evaluate existing water recycling and bus washing processes in OMBSC004: <ul style="list-style-type: none"> - Hand washing of buses, Morisset - Ride on pony wash, Edgeworth 	<p>a negative result. No further action required.</p> <p>No further issued reported.</p> <p>Acquisition of new assets in OMBSC004:</p> <ul style="list-style-type: none"> • Morisset, walk behind tethered pony. • Edgeworth, existing ride on pony replaced 	Facilities Manager
Reduce water consumption through rainwater harvesting and recycling.	<ul style="list-style-type: none"> Monitor recycled water usage at each depot, where a rainwater tank and metre is installed. 	<p>Metres installed on rainwater harvesting tanks:</p> <ul style="list-style-type: none"> • Morisset OMBSC004 • Halloran OMBSC011 • Singleton OMBSC002 • Katoomba OMBSC008 <p>Usage is not being monitored.</p>	Sustainability Procurement Manager
Reduce electric power consumption	<ul style="list-style-type: none"> Install solar panels in all Region 2 and 4 depots. 	Solar panels not installed. Program on hold in both OMBSC002 and OMBSC004	Sustainability Procurement Manager
Storage, use and disposal of paints and solvents.	<ul style="list-style-type: none"> Continue to implement existing procedures to manage environmental impacts and review regularly for any potential gaps or improvements in environmental management of storage, use and disposal of solvents. 	<p>Waste disposed via nominated licenced provider.</p> <p>Ongoing quarterly environmental and</p>	HSEQ Specialist

Focus Area	Initiative	Status	Role responsible
	<ul style="list-style-type: none"> Conduct regular housekeeping inspections. 	<p>workplace inspections completed as planned.</p> <p>Ongoing quarterly environmental and workplace inspections completed as planned. Identified actions completed.</p>	<p>Facilities Manager</p>
<p>Ensure compliance with <i>Reduce, Reuse and Recycle</i> approach.</p>	<ul style="list-style-type: none"> Continue to separate waste and recycle appropriate materials 	<p>Appropriate waste and recycling bins in place. Licenced contractors engaged, where required.</p>	<p>Sustainability Procurement Manager</p>
	<ul style="list-style-type: none"> Monitor and measurement of various waste types and recycled waste. 	<p>Monitor and measurement of various waste types, not yet introduced.</p>	<p>Sustainability Procurement Manager</p>
	<ul style="list-style-type: none"> Continue to introduce native plant species in gardens around depots to minimise water consumption. 	<p>Implemented where appropriate.</p>	<p>Facilities Manager</p>
<p>Monitoring and reporting energy consumption.</p>	<ul style="list-style-type: none"> Collate and input energy consumption data into the Australia Government’s Emission and Energy Reporting System (EERS) under the National Greenhouse and Energy Reporting (NGER) Act 2007. 	<p>Reports completed and submitted as per timeframes.</p>	<p>General Manager Assets</p>
	<ul style="list-style-type: none"> Lighting upgrades to include timers and solar lighting where practicable. 	<p>Lighting upgrade completed in OMBSC004 Edgeworth depot. Combination of LED and solar lighting installed in bus parking areas, bus wash and fuel bay. Timers installed for all LED lights.</p>	<p>Facilities Manager</p>

Focus Area	Initiative	Status	Role responsible
Management and protection of local fauna	<ul style="list-style-type: none"> Nontoxic and zero harm approach to managing native and introduced species of birds 	Installation of netting (physical barrier) to protect infrastructure: <ul style="list-style-type: none"> Thornton OMBSC002, bird netting installed within roof of bus wash and bus under carriage wash bays. Edgeworth OMBSC004, bird netting installed in roof of maintenance workshop. 	Facilities Manager
Reduce impact on air quality.	<ul style="list-style-type: none"> Clean fleet accreditation is maintained, yearly 	Clean fleet accreditation certificate reissued 2024-2025, nil major non-conformances	General Manager Assets
Accredited Environmental Management System.	<ul style="list-style-type: none"> Maintain a robust environmental management system. 	ISO14001 certification audited, May 2024 and reissued, nil major non-conformances	GM HSEQ

Key Initiatives *section*.

Table 8: Environmental Action Plan

Issue	Region	Control	Ongoing Monitoring & Measurement	Responsible person	Status
Damage to sealed. Parking areas may provide opportunities for contaminants to enter the ground or watercourse.	Regions 2, 4, 8 and 11	CDC will systematically monitor and reseal material damage.	<p>Monitoring</p> <ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report 	General Manager OMSBC Facilities Manager	Ongoing
Optimisation of existing bus washing processes to further reduce environmental impacts.	Regions 2, 4, 8 and 11	<p>CDC will conduct a review of existing water recycling and bus washing processes to confirm oil water separators in place and no water contamination opportunities exist.</p> <p>This will include a review to ensure that environmentally friendly bus washing chemicals are being used (where appropriate), effective bunding is in place, oil water separator systems are installed with ongoing maintenance plans, water wastage is minimised.</p> <p>Review opportunities for improvement to site infrastructure through rainwater harvesting.</p> <p>A plan for rectification and upgrading at required sites will be developed as required.</p>	<p>Monitoring</p> <ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. • Management system audits <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report • Management system audit report 	General Manager OMSBC Facilities Manager General Manager HSEQ	Ongoing
Review of onsite sewage systems to	Regions 4 and 11	CDC will complete a systematic review of remaining onsite sewage systems including septic tanks and assess risk with local	Monitoring	General Manager OMSBC	Ongoing

Issue	Region	Control	Ongoing Monitoring & Measurement	Responsible person	Status
ensure effective management.		<p>government water authority of installed systems in this region and ensure local council inspection program is implemented based on risk level for systematic maintenance.</p> <p>CDC will also assess and where possible plan for decommissioning of existing septic tanks and connection to town sewage system and implement trade waste agreement with regular testing and results monitored.</p>	<ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report 	Facilities Manager	
Oil, tyre, and dry waste recycling program review.	Regions 2, 4, 8 and 11	<p>CDC will review existing arrangements for oil, oil filters, tyre, and dry waste recycling at all sites in the region identifying any room for improvement and bring these sites in line with overall environmental plan requirements.</p> <p>CDC has agreements in place with accredited contractors for these sites.</p>	<p>Monitoring</p> <ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report 	<p>General Manager OMSBC</p> <p>Sustainability Procurement Manager</p>	Ongoing
Asbestos containing material may exist within various buildings across the regions.	Regions 2, 4, 8 and 11	<p>CDC will develop and maintain an Asbestos Management Plan and register in accordance with Safe Work Australia How to Manage and Control Asbestos in the Workplace Code of Practice 2019. The AMP will be reviewed by an independent third party every 5 years.</p> <p>Site upgrades will include a review if asbestos removal is required and/or appropriate.</p>	<p>Monitoring</p> <ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report. 	<p>General Manager OMSBC</p> <p>Facilities Manager</p> <p>General Manager HSEQ</p>	Ongoing

Issue	Region	Control	Ongoing Monitoring & Measurement	Responsible person	Status
			<ul style="list-style-type: none"> • Open actions in Improvement Register. • Asbestos Management Plan and register and report. 		
<p>With residential homes existing close to the depot, excess noise will cause disturbance to neighbours.</p>	<p>Regions 4 and 8</p>	<p>CDC will implement a protocol to limit vehicle idling and sounding horn when reversing, at identified depots.</p>	<p>Monitoring</p> <ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. • Community complaints. <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report 	<p>General Manager OMSBC Facilities Manager</p>	<p>Ongoing</p>
<p>Potential contamination migration from underground fuel tank.</p>	<p>Region 8</p>	<p>CDC will conduct water sampling and line integrity testing to ensure against any potential new contamination, Katoomba depot only.</p>	<p>Monitoring</p> <ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report • Third party test and inspect reports 	<p>General Manager OMSBC Facilities Manager</p>	<p>Ongoing</p>

Issue	Region	Control	Ongoing Monitoring & Measurement	Responsible person	Status
Storage, use and disposal of paints and solvents.	Region 4	<p>CDC will complete a systematic review of product storage, existing activities, and disposal of waste to ensure any potential gaps or improvements are identified, Edgeworth Panel Shop only.</p> <p>This included a review of storage and handling procedures, bunding, containers, maintenance and disposal of all paints, solvents, and chemicals.</p>	<p>Monitoring</p> <ul style="list-style-type: none"> • Key Performance Indicators – Environmental Incidents reported in daily and monthly reports. • Quarterly Depot Safety and Environmental Workplace Inspections. <p>Measurement</p> <ul style="list-style-type: none"> • Quarterly Environmental Management Plan Report 	<p>General Manager OMSBC</p> <p>Procurement Manager Facilities Manager</p>	Ongoing

2.4 Environmental training

During induction to CDC, all staff receive training in the importance of carrying out business in an environmentally responsible way – with specific elements for individual roles captured in the Training Plan. These may include:

- An outline of how specific roles impact environmental outcomes
- Best practice approaches to handling emergency management
- The clear prioritisation that CDC places on environmental management

Table 9 summarises our environmental training initiatives

Table 9: Summary of environmental training.

Module	Training regime	Description
All staff modules	CDC induction	History, operations, CDC values, and corporate introduction.
	Risk management	Hazard identification, risk assessment and control.
	WHS management	WHS Act 2011 introduction, safety policies, drug and alcohol, injury management, use of fire extinguishers, manual handling, pre-departure check, report defect procedures.
	Environmental management	POEO Act 1997 introduction, fuelling, waste management, air pollution reduction, control of contamination, noise management, protection of wildlife, storage and management of oils, chemicals, and waste.
	Depot information	Key personnel, emergency evacuation, site protection, tour of depot and other site-specific information.
Note: Environmental decision-making is a key component of all staff training.		
Drivers' modules	Operation	ECO-driving training, understanding telematics and scorecards, fuel-saving strategies, and emergency response.
Mechanics' modules	Maintenance	Standard Operating Procedures (SOP) on hazardous waste handling, noise management, heritage protection procedure, air pollution prevention procedure, and Clean Fleet.
Management and administration modules	Environmental leadership	Environmental awareness, understanding of the environmental impacts resulting from decisions made, environmental reporting, environmental management system elements, procurement, and project management e.g. capital improvement projects.

2.5 Communication and stakeholder engagement

CDC engages with our stakeholders to ensure we understand what is important to the communities we serve and how to best meet their needs. Our Stakeholder Engagement Plan is tailored to guide us in continuing to learn from our stakeholders and build strong, mutually beneficial relationships with them through a clear and transparent roadmap.

Our Communications and Marketing Plan outlines our vision regarding how we determine, prioritise, and communicate with target audiences to help meet and, where possible, exceed our customer needs.

CDC ensures transparency regarding our environmental strategies publishes our Sustainability Transport Charter on our website and makes it available to customers, upon request, free of charge.

The CDC Leadership Team attends various environmental, transportation and industry-related conferences to build awareness and learn about innovations and initiatives that can be used to promote best practices across the organisation. At a macro-level, this also includes subscriptions and memberships to international standards updates through ISO certification providers that CDC engages.

At a micro-level, the GM Outer Metro also continues local community stakeholder engagement programs including monthly attendance at local council committee meetings and ongoing communication with local elected representatives.

2.6 Environmental Emergency Preparedness

CDC's commitment to the environment and environmental management provides a Business Continuity Plan (BCP) and Disruption Management Plans by depot/site, with measures in place to help ensure all people and assets can be safeguarded in an emergency while minimising the impact on customers. During unplanned disruptions, our aim is to ensure our continued operation, where possible and appropriate, while ensuring the safety of people, assets, products, information, and the environment.

CDC has developed procedures that outline how critical incidents and emergencies are managed. Procedures define responsibility for coordination and management and clear communication arrangements. All procedures are aligned to the requirements of the BOAS bus driver and bus operator guides and the Traffic Management Centre (TMC) Operator Interface Protocols (OIP). This includes the TfNSW First Five-Minute Protocols.

Reporting requirements mandated by government agencies including Environment Protection Authority (EPA), Office of Transport Safety Investigations (OTSI) and RMS, and the engagement (where required) of NSW Police and State Emergency Services are clearly defined. This includes the responsibilities of the HSEQ Team, CDC Operations and Customer Centre (OCC) articulated. For operational events causing disruptions, the TMC provides a single *source of truth* and is the conduit for all information and coordination.

2.6.1 Business Continuity and Depot Disruption Management Plans

The BCP and individual depot Disruption Management Plans ensure a company-wide consistent response to emergencies, crises, and disruptions, including environmental incidents, providing scalable control measures to respond to increases or decreases in risk when a threat to the business changes. The BCP provides clear, actionable direction, ensuring the Plan can be carried out safely and competently. Each depot has an individual Plan for specific disruption management strategies. (Refer to the BCP and attached Depot Disruption Management Plans for more information.)

All processes, protocols, equipment, and responses are tested annually for effectiveness – this includes mock drills to test responses and the capability of staff.

The approach to crisis/emergency/disruption events is shown [Figure 9](#). This procedure categorises incidents into three levels, each with correlating activation requirements. At each level, there are defined responsibilities for the local response, such as evacuation protocols, and individual action, such as bus evacuation and spill containment.

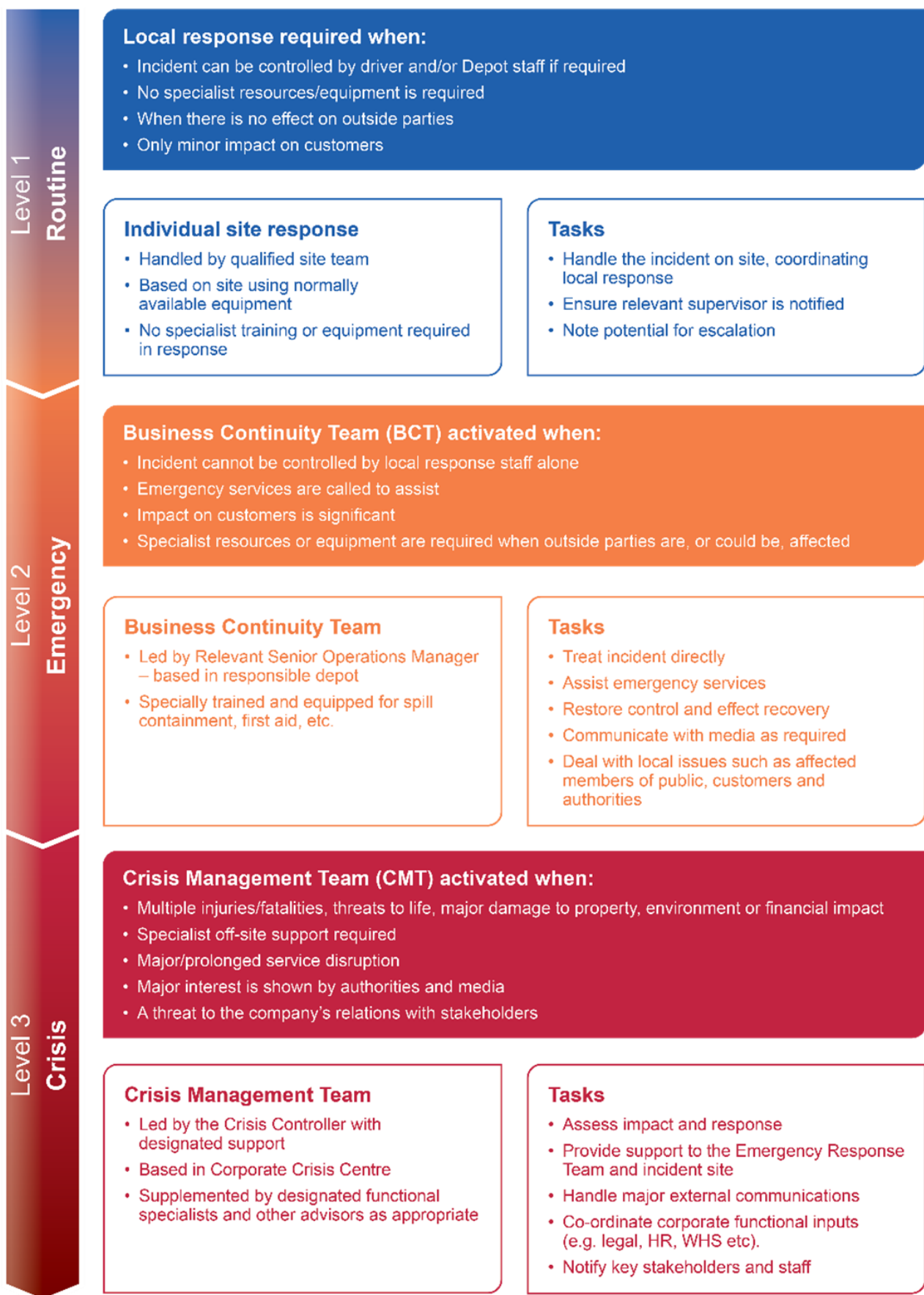


Figure 9: CDC's emergency, disruption, and crisis management approach.

2.6.2 Technology support

Emergency and crisis protocols are supported, wherever possible, by technology. This includes:

- Duress alarms to provide direct communication with the OCC during on-road incidents.
- OCC personnel are regularly trained to response protocols
- All incidents are reported, with all levels two and three incidents critically reviewed. Level three incidents are investigated and reviewed by the HSEQ General Manager.

2.6.3 Incident reporting

CDC undertakes a real-time process for incident reporting, recording and investigation of all environmental incidents.

The OCC answers all incidents reported by drivers. The OCC Operator provides instant feedback to identify potential environmental issues and impacts. Depending on the nature of the incident, the OCC escalates it to the GM Outer Metro, who is responsible for reporting to TfNSW, and/or other authorities. Reporting to EPA is the responsibility of HSEQ Specialist or General Manager HSEQ.

All staff members are required to complete an incident or communication report. This report covers near misses, potential environmental contamination, or other pollution incidents. The respective manager investigates and identifies the cause and contributing factors accordingly.

Actions identified are recorded to ensure all incidents are captured and investigated. The GM HSEQ and the GM Outer Metro are responsible for reviewing the incident and subsequent actions to control further risks.

2.6.4 Crisis management and key personnel

For each level of disruption, key personnel are identified within the region and within CDC depots and offices. Generally, these are led by the GM Outer Metro and consist of a trained Crisis Coordinator, Planning and Administration functions, Operations Support personnel and a dedicated Communications Team.

2.6.5 Post incident Reviews and investigations

A formal review of any incident and its management is undertaken in any instance where the BCP and/or Disruption Management Plan is deployed. The Crisis Management Team develops an incident investigation and report. The purpose of this process is to understand:

- Causation and contributing factors.
- Actions required by CDC to mitigate the impact of the incident or contamination.
- The effectiveness of the plan and its integration in responding to the incident.
- Long-term preventative actions and/or changes to CDC's environmental systems so that the incident will not reoccur.

This is a key process in ensuring our systems and approaches continue to develop and improve. This includes evaluation of the Plan, the response itself, the performance of the team and the need, if any, of further training.

2.6.6 Validation and improvement

Validation of all crises, emergency and disruption plans and processes is built into our continual improvement cycle, ensuring all plans remain current, understood, and relevant. All plans are reviewed annually as part of CDC's annual risk management review program.

3 Outcomes: Jul 2024 – Jun 2025

Table 10 below outlines the Outcomes of the initiatives that CDC have planned for 2024.

Table 10: Summary of Outcomes 2024.

Focus Area	Initiative	Status	Role responsible
Management of asbestos containing materials.	<ul style="list-style-type: none"> Systematically monitor condition of asbestos at identified depots. 	<p>Ongoing quarterly environmental and workplace inspections completed as planned. Nil findings related to the management of asbestos.</p> <p>Warning Signage installed in Singleton depot as planned, March 2024.</p>	HSEQ Specialist
	<ul style="list-style-type: none"> Maintain currency of asbestos register and Hazardous Substances/Asbestos management plan, review every 5 years. 	<p>Asbestos Register and Hazardous Material Management Plans reviewed OMBSC002</p> <ul style="list-style-type: none"> Singleton – continue to manage as per recommendations. Thornton – nil asbestos identified. <p>Planning commenced, review asbestos register and management plan at Emu Plains, due July 2025.</p>	HSEQ Specialist

Focus Area	Initiative	Status	Role responsible
		No actions required for OMBSC004 or OMBSC011.	
	<ul style="list-style-type: none"> All infrastructure upgrade projects will include a review of the asbestos register and, if appropriate, removal of known asbestos. 	Thornton depot, minor works and internal fit, end March 2024. Nil asbestos identified during works.	Facilities Manager
Mitigate potential contamination from underground fuel tank, Katoomba.	<ul style="list-style-type: none"> Continue to conduct daily fuel dips to monitor usage and assist in identifying potential seepage. 	Completed daily, ongoing.	General Manager Assets
	<ul style="list-style-type: none"> Undertake six monthly ground water sampling from ground water monitoring wells to identify any potential contamination. 	Inspection completed: <ul style="list-style-type: none"> 27 February 2024 16 September 2024 	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct fuel line integrity testing annually 	Inspection completed: <ul style="list-style-type: none"> 8 April 2024 	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct non-destructive storage tank integrity testing annually to identify any potential asset failure. 	Inspection completed: <ul style="list-style-type: none"> 8 April 2024 	General Manager Assets
Mitigate potential contamination from above ground fuel tanks	<ul style="list-style-type: none"> Continue to conduct fuel line integrity testing annually 	Inspection completed: OMBSC008 <ul style="list-style-type: none"> Valley Heights, April 2024 Emu Plains, not completed as tank due for replacement Q1 2025. OMBSC002	General Manager Assets

Focus Area	Initiative	Status	Role responsible
		<ul style="list-style-type: none"> • Thornton, not completed as tank due for replacement Q1 2025. • Singleton, June 2024 <p>OMBSC004</p> <ul style="list-style-type: none"> • Toronto, June 2024 • Edgeworth, June 2024 • Morisset, June 2024 • Halloran, June 2024 	
	<ul style="list-style-type: none"> • Continue to conduct non-destructive storage tank integrity testing every 5 years annually in accordance with inspection and test plan to identify any potential asset failure. 	<p>Inspection completed:</p> <p>OMBSC008</p> <ul style="list-style-type: none"> • Valley Heights, April 2024 • Emu Plains, not completed as tank due for replacement Q1 2025. <p>OMBSC002</p> <ul style="list-style-type: none"> • Thornton, not completed as tank due for replacement Q1 2025. • Singleton, June 2024 <p>OMBSC004</p> <ul style="list-style-type: none"> • Toronto, June 2024 • Edgeworth, June 2024 • Morisset, June 2024 	<p>General Manager Assets</p>

Focus Area	Initiative	Status	Role responsible
		OMBSC011 • Halloran, June 2024	
Optimise existing bus washing processes to improve water quality.	<ul style="list-style-type: none"> Continue to conduct water quality testing to monitor quality of water discharged as per trade wastewater agreements. 	Ongoing testing completed as planned. During routine testing undertaken in Q1 2024, high levels of COD (Chemical Oxygen Demand) were detected in water/sludge removed from underground waste pits, at Morisset and Toronto depots. New process introduced at all depots. Waste sludge removed, separated from water. Disposed by licenced contractor as waste oil. No further issued reported.	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct water testing for legionella to monitor quality of water reused for bus washing, quarterly. 	Ongoing testing completed as planned. During routine testing undertaken in Q2 2024, a positive legionella count was identified at Toronto. Remedial action was taken as recommended by contractor. Secondary follow up testing provided	General Manager Assets

Focus Area	Initiative	Status	Role responsible
	<ul style="list-style-type: none"> Review and evaluate existing water recycling and bus washing processes in OMBSC004: <ul style="list-style-type: none"> - Hand washing of buses, Morisset - Ride on pony wash, Edgeworth 	<p>a negative result. No further action required.</p> <p>No further issued reported.</p> <p>Acquisition of new assets in OMBSC004:</p> <ul style="list-style-type: none"> Morisset, walk behind tethered pony. Edgeworth, existing ride on pony replaced 	Facilities Manager
Reduce water consumption through rainwater harvesting and recycling.	<ul style="list-style-type: none"> Monitor recycled water usage at each depot, where a rainwater tank and metre is installed. 	<p>Metres installed on rainwater harvesting tanks:</p> <ul style="list-style-type: none"> Morisset OMBSC004 Halloran OMBSC011 Singleton OMBSC002 Katoomba OMBSC008 <p>Usage is not being monitored.</p>	Sustainability Procurement Manager
Reduce electric power consumption	<ul style="list-style-type: none"> Install solar panels in all Region 2 and 4 depots. 	Solar panels not installed. Program on hold in both OMBSC002 and OMBSC004	Sustainability Procurement Manager
Storage, use and disposal of paints and solvents.	<ul style="list-style-type: none"> Continue to implement existing procedures to manage environmental impacts and review regularly for any potential gaps or improvements in environmental management of storage, use and disposal of solvents. 	<p>Waste disposed via nominated licenced provider.</p> <p>Ongoing quarterly environmental and</p>	HSEQ Specialist

Focus Area	Initiative	Status	Role responsible
	<ul style="list-style-type: none"> Conduct regular housekeeping inspections. 	<p>workplace inspections completed as planned.</p> <p>Ongoing quarterly environmental and workplace inspections completed as planned. Identified actions completed.</p>	<p>Facilities Manager</p>
<p>Ensure compliance with <i>Reduce, Reuse and Recycle</i> approach.</p>	<ul style="list-style-type: none"> Continue to separate waste and recycle appropriate materials 	<p>Appropriate waste and recycling bins in place. Licenced contractors engaged, where required.</p>	<p>Sustainability Procurement Manager</p>
	<ul style="list-style-type: none"> Monitor and measurement of various waste types and recycled waste. 	<p>Monitor and measurement of various waste types, not yet introduced.</p>	<p>Sustainability Procurement Manager</p>
	<ul style="list-style-type: none"> Continue to introduce native plant species in gardens around depots to minimise water consumption. 	<p>Implemented where appropriate.</p>	<p>Facilities Manager</p>
<p>Monitoring and reporting energy consumption.</p>	<ul style="list-style-type: none"> Collate and input energy consumption data into the Australia Government’s Emission and Energy Reporting System (EERS) under the National Greenhouse and Energy Reporting (NGER) Act 2007. 	<p>Reports completed and submitted as per timeframes.</p>	<p>General Manager Assets</p>
	<ul style="list-style-type: none"> Lighting upgrades to include timers and solar lighting where practicable. 	<p>Lighting upgrade completed in OMBSC004 Edgeworth depot. Combination of LED and solar lighting installed in bus parking areas, bus wash and fuel bay. Timers installed for all LED lights.</p>	<p>Facilities Manager</p>

Focus Area	Initiative	Status	Role responsible
Management and protection of local fauna	<ul style="list-style-type: none"> Nontoxic and zero harm approach to managing native and introduced species of birds 	Installation of netting (physical barrier) to protect infrastructure: <ul style="list-style-type: none"> Thornton OMBSC002, bird netting installed within roof of bus wash and bus under carriage wash bays. Edgeworth OMBSC004, bird netting installed in roof of maintenance workshop. 	Facilities Manager
Reduce impact on air quality.	<ul style="list-style-type: none"> Clean fleet accreditation is maintained, yearly 	Clean fleet accreditation certificate reissued 2024-2025, nil major non-conformances	General Manager Assets
Accredited Environmental Management System.	<ul style="list-style-type: none"> Maintain a robust environmental management system. 	ISO14001 certification audited, May 2024 and reissued, nil major non-conformances	GM HSEQ

4 Key Initiatives: Jul 2025 – Jun 2026

Table 11 outlines CDC’s key actions relating to environmental management, consistent with this EMP for OMBSC Regions 2, 4, 8 and 11.

Table 11: Key environmental Initiatives.

Focus Area	Initiative	Status	Role responsible
Management of asbestos containing materials.	<ul style="list-style-type: none"> Systematically monitor condition of asbestos at identified depots. 	Ongoing quarterly environmental and workplace inspections.	HSEQ Specialist
	<ul style="list-style-type: none"> Maintain currency of asbestos register and Hazardous Substances/Asbestos management plan, review every 5 years. 	Asbestos Register and Hazardous Material Management Plans to be reviewed in OMBSC008: <ul style="list-style-type: none"> Emu Plains, July 2025. 	HSEQ Specialist
	<ul style="list-style-type: none"> All infrastructure upgrade projects will include a review of the asbestos register and, if appropriate, removal of known asbestos. <ul style="list-style-type: none"> OMBSC002 Thornton, minor construction work and internal fit within operations building, end May 2025. 	Planned, end May 2025	Facilities Manager
Mitigate potential contamination from underground fuel tank, Katoomba.	<ul style="list-style-type: none"> Continue to conduct daily fuel dips to monitor usage and assist in identifying potential seepage. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> Undertake six monthly ground water sampling from ground water monitoring wells to identify any potential contamination. 	Planned inspection: <ul style="list-style-type: none"> February 2026 September 2025 	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct fuel line integrity testing annually 	Planned inspection, end December 2025	General Manager Assets

Focus Area	Initiative	Status	Role responsible
	<ul style="list-style-type: none"> Continue to conduct non-destructive storage tank integrity testing annually to identify any potential asset failure. 	Planned inspection, end December 2025	General Manager Assets
Mitigate potential contamination from above ground fuel tanks	<ul style="list-style-type: none"> Continue to conduct fuel line integrity testing annually. 	Planned inspection, end December 2025	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct non-destructive storage tank integrity testing every 5 years annually in accordance with inspection and test plan to identify any potential asset failure. 	Planned inspection, end December 2025	General Manager Assets
	<ul style="list-style-type: none"> Removal of existing horizontal single skin ASTs, replace with a self-bunded AST. <ul style="list-style-type: none"> - Thornton OMBSC002 - Emu Plains OMBSC008 	Planned completion: <ul style="list-style-type: none"> • Thornton, end March 2025 • Emu Plains, end May 2025 	Facilities Manager
	<ul style="list-style-type: none"> Installation of electronic level gauges to existing ASTs to improve monitoring of fuel usage. <ul style="list-style-type: none"> - Toronto, dual tanks OMBSC004 - Edgeworth, OMBSC004 	Planned completion, end Q1 2025	Facilities Manager
Optimise existing bus washing processes to improve water quality.	<ul style="list-style-type: none"> Continue to conduct water quality testing to monitor quality of water discharged as per trade wastewater agreements. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> Continue to conduct water testing for legionella to monitor quality of water reused for bus washing, quarterly. 	Ongoing	General Manager Assets
Reduce water consumption	<ul style="list-style-type: none"> Invest in new bus wash infrastructure to reduce water consumption and improve quality of recycled water. <ul style="list-style-type: none"> - Thornton, OMBSC002 	Planned completion, end June 2025	Sustainability Procurement Manager

Focus Area	Initiative	Status	Role responsible
Storage, use and disposal of paints and solvents.	<ul style="list-style-type: none"> Continue to implement existing procedures to manage environmental impacts and review regularly for any potential gaps or improvements in environmental management of storage, use and disposal of solvents. 	Ongoing	HSEQ Specialist
	<ul style="list-style-type: none"> Conduct regular housekeeping inspections. 	Quarterly	Facilities Manager
Ensure compliance with <i>Reduce, Reuse and Recycle</i> approach.	<ul style="list-style-type: none"> Continue to separate waste and recycle appropriate materials 	Ongoing	Sustainability Procurement Manager
	<ul style="list-style-type: none"> Monitor various waste types and recycled waste. 	Ongoing	Sustainability Procurement Manager
	<ul style="list-style-type: none"> Continue to introduce native plant species in gardens around depots to minimise water consumption. 	Ongoing	Facilities Manager
Monitoring and reporting energy consumption.	<ul style="list-style-type: none"> Collate and input energy consumption data into the Australia Government's Emission and Energy Reporting System (EERS) under the National Greenhouse and Energy Reporting (NGER) Act 2007. 	Ongoing	General Manager Assets
	<ul style="list-style-type: none"> Lighting upgrades to include timers, motion sensors and solar lighting where practicable. 	Ongoing	Facilities Manager
Management and protection of local flora and fauna	<ul style="list-style-type: none"> Nontoxic and zero harm approach to managing native and introduced species of birds <ul style="list-style-type: none"> - Katoomba, OMBSC008 	Review and monitor	Facilities Manager
	<ul style="list-style-type: none"> Management of non-native plant species (bamboo and other) from encroaching on growth of local native plant species 	Annually	Facilities Manager

Focus Area	Initiative	Status	Role responsible
	<ul style="list-style-type: none"> - Valley Heights, OMBSC008 		
Reduce impact on air quality.	<ul style="list-style-type: none"> • Clean fleet accreditation is maintained, yearly 	Ongoing accreditation	General Manager Assets
Accredited Environmental Management System.	<ul style="list-style-type: none"> • Maintain a robust environmental management system. 	Ongoing accreditation	GM HSEQ

