

Red Bus

CDC

NSW



# Environmental Management Plan

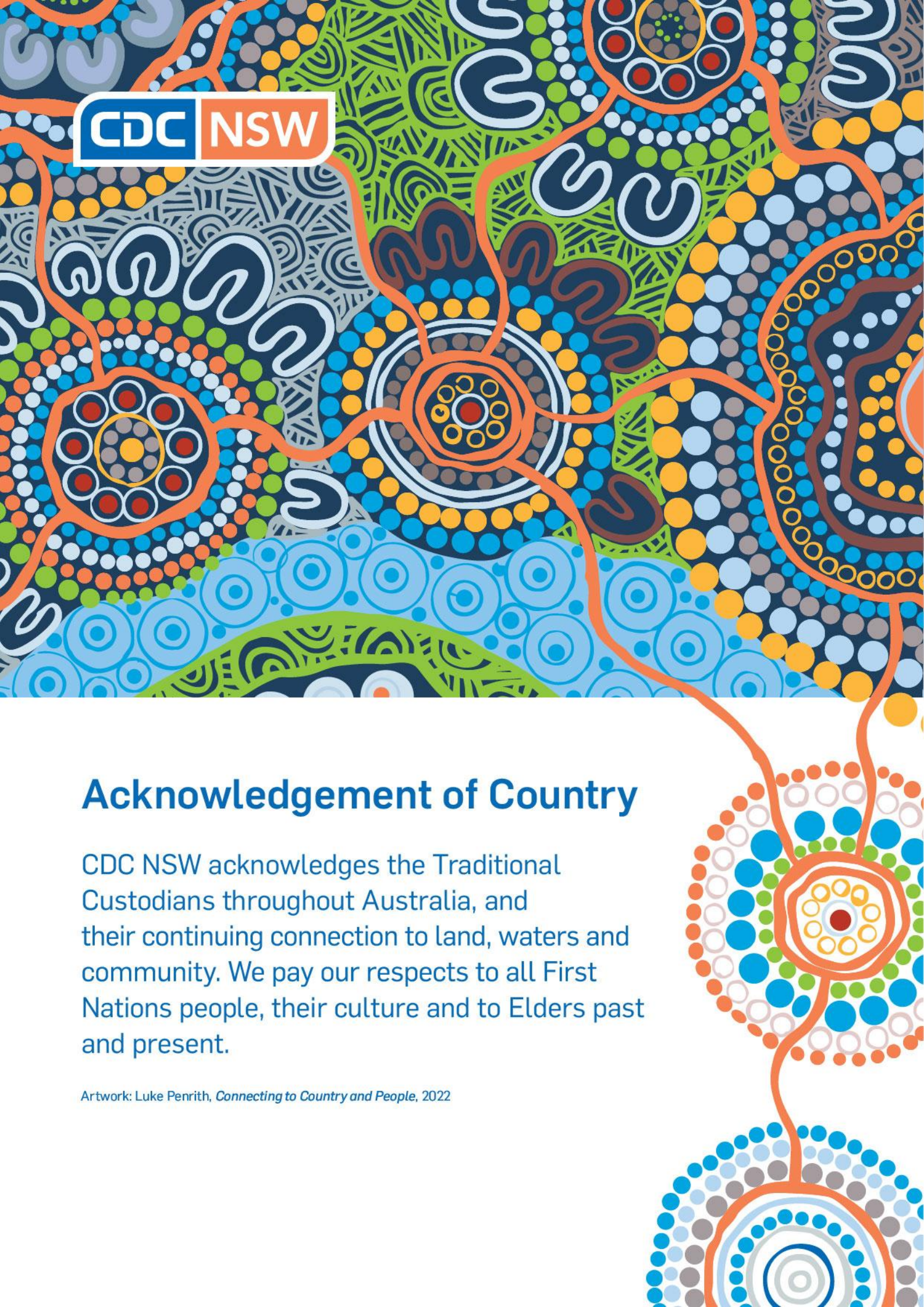
2025



## 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

Version	Name	Title	Changes
V2	John Paul Avila	HSEQ Advisor	Plan updated for 2025

Document approval

Review/ Approval	Name	Title	Date
Reviewed by	Sajana Elsa Koshy	Contracts Manager, CDC NSW	23 April 2025
Approved by	John Papagianis	GM HSEQ	05 May 2025
Approved by	Jodie Mallia	General Manager Outer Metro	29 April 2025
Approved by	Evina Govender	General Manager Shared Services	1 May 2025

## Definitions

Red Bus 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
<b>A/C</b>	Air Conditioning
<b>BCP</b>	Business Continuity Plan
<b>BOAS</b>	Bus Operator Accreditation Scheme
<b>CDC</b>	CDC NSW
<b>CDG</b>	ComfortDelGro
<b>CEO</b>	Chief Executive Officer
<b>EAR</b>	Environmental Aspects Register
<b>EERS</b>	Emission and Energy Reporting System
<b>EMP</b>	Environmental Management Plan
<b>EMS</b>	Environmental Management System

Term	Definition
<b>EPA</b>	Environment Protection Authority
<b>GHG</b>	Greenhouse Gas
<b>GM</b>	General Manager
<b>GM HSEQ</b>	General Manager Health, Safety, Environment and Quality
<b>OMBSC7</b>	Outer Metropolitan Bus Service Contract Region 7
<b>HSEQ</b>	Health, Safety, Environment and Quality
<b>IMS</b>	Integrated Management System
<b>ISO</b>	International Organisation for Standardisation
<b>KPI</b>	Key Performance Indicator
<b>LED</b>	Light-emitting diode
<b>NGER</b>	National Greenhouse and Energy Reporting
<b>OCC</b>	Operations and Customer Centre
<b>OHS</b>	Occupational Health and Safety
<b>OTSI</b>	Office Of Transport Safety Investigations
<b>P&amp;E</b>	Plant & Equipment
<b>PESTLE</b>	Analysis of Political, Economic, Social, Technological, Legal and Environmental factors
<b>POEO</b>	Protection of the Environment Operations Act
<b>PRIME</b>	Principal Resource and Information Management System
<b>RACI</b>	Responsible, Accountable, Consulted, Informed
<b>Red Bus CDC</b>	Red Bus CDC NSW
<b>RMS</b>	Roads and Maritime Services
<b>SAS</b>	Service Assurance System
<b>SOP</b>	Standard Operating Procedures
<b>SWOT</b>	Strengths, Weaknesses, Opportunities and Threats analysis
<b>TfNSW</b>	Transport for New South Wales
<b>TMC</b>	Traffic Management Centre

Term	Definition
<b>UNSDG</b>	United Nations Sustainable Development Goals
<b>WHS</b>	Work Health and Safety
<b>ZEB</b>	Zero Emission Bus

## Compliance Table

Schedule 5 Clause	Description	Page in Plan
<b>7.4</b>	<b>Environmental Plan</b>	
(a)	Red Bus CDC will develop, implement, maintain, and comply with this Environmental Plan from the Planned Service Commencement Date.	Page 1
(b)	Red Bus 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 19 and
(c)	Red Bus 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 1 and 3
(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 1
(e)	Red Bus 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 16
(f)	If requested by TfNSW, the Operator must demonstrate that it has appropriate environmental management systems in place	Page 6.
<b>8.6</b>	<b>Quarterly Environmental Management Plan Report</b>	Page 6 and 19.

Schedule 5 Clause	Description	Page in Plan
	(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.	

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# 1 Introduction

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

Red Bus CDC has developed this Environmental Management Plan (EMP) for Outer Metropolitan Bus Service Contract Region 7 (OMBSC7) to deliver practical and achievable environmental outcomes consistent with CDC's Environmental Management System (EMS) which is certified to ISO 14001. Red Bus CDC reviews the EMP to improve the delivery of services and operations across OMBSC7, including the strategies, commitments, and actions that the team implements to minimise environmental impacts; and maintain compliance with 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, Red Bus CDC maintains environmental initiatives across the business which support sustainability within operations and visibly to customers and the broader community. This includes publishing the Sustainability Charter on the Red Bus CDC website and making it available to passengers, upon request, free of charge.

## 1.1 Scope, purpose, vision

### 1.1.1 Scope

To ensure Red Bus CDC remains aware of the operational context, relevant to the scope of the EMP, the Leadership Team performs:

- Analysis of Political, Economic, Social, Technological, Legal and Environmental (PESTLE) factors
- Analysis of Strengths, Weaknesses, Opportunities and Threats (SWOT)

These annual reviews ensure Red Bus CDC plans for the environmental impacts affecting OMBSC7 and that the EMP and other plans/systems remain current and appropriate for the operating context.

The scope of the Red Bus CDC EMP is determined by:

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

The EMP ensures that:

- The commitments given at the planning and assessment stage are carried into 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 their 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 the 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 operations, setting new environmental standards and ensuring all team members play their role. This is achieved by building an organisation-wide culture that imbues sustainability and environmental care into every aspect of the business and every decision that is made.

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

Red Bus CDC recognises that operations consume resources and have a significant impact on the environment. As such, the team reviews, refines and adheres to the EMP, regulatory frameworks, and Red Bus CDC's policies/procedures to minimise the impact on the environment.

The EMP guides the team and describes how the vision is delivered including:

- Establishing clear senior leadership commitment to environmental management
- Embedding Red Bus CDC's successful environmental practices and investment history to the environmental demands and requirements of OMSBC7
- Aligning local programs to recognise CDG's global sustainability goal of *"Enabling an Energy Efficient Transport System"*
- Delivering Red Bus CDC's six key strategic themes at a local level (see the *Environmental sustainability strategies section*)
- Documenting the commitments and undertakings Red Bus CDC implements and is 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 Red Bus 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).

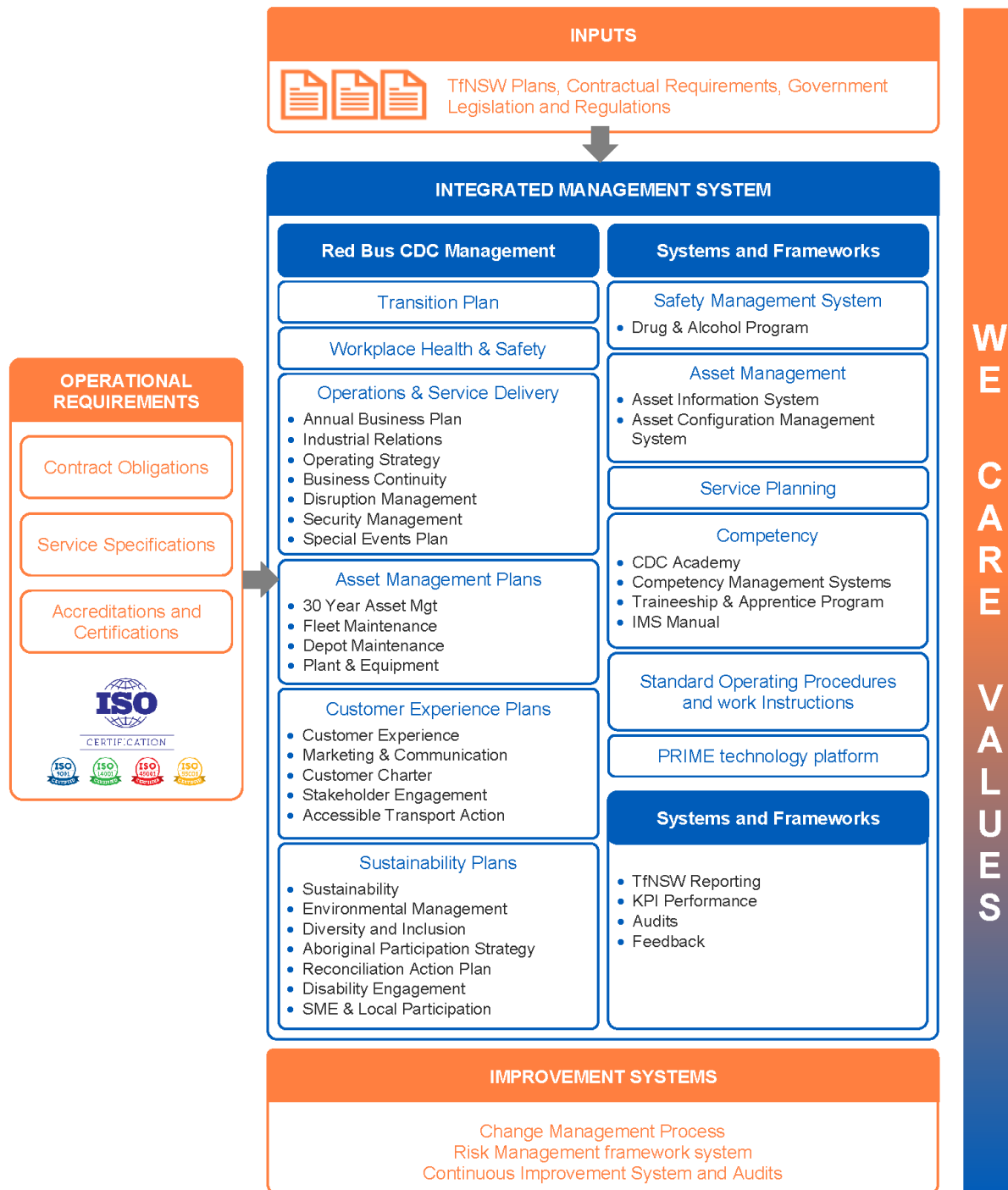


Figure 1: The Integrated Management System aligns management plans and systems across all business functions for clear understanding, consistent approaches, and timely action.

The IMS provides guidance on all aspects of Red Bus CDC’s operations required to deliver consistent, accessible, and high-quality services that minimise environmental impacts where possible. In addition, the Plan has been developed to comply with the principles of ISO 9001 Quality, ISO 14001 Environmental Management, ISO 31000 Risk Management, ISO 45001 Occupational Health and Safety (OHS), 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 The EMP is also aligned with other related documents also noted in Table 1.

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 note are:  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	Bus wash water is treated as part of the recycling process through an oil water separator system. The system is diligently pressure cleaned. The system is designed to automatically discharge recycled overflow to sewer waste on an as needs basis. A fitted metre tracks quantity.

Legislative requirements	Related documents	CDC Application
		Local Council record a metre read and undertake water testing bi-monthly. No action required during the reporting period
Contaminated Land Management Act 1997 (NSW)	ISO 14001: Environmental Management Systems ISO 18504: Soil quality – Sustainable remediation	Regular testing of the integrity of our above ground tanks (AST). Regular ground water sampling. 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 CoP - How to manage and control asbestos in the workplace (Dec 2022)	Five yearly reviews and inspections of depots with identified presence of asbestos. Remedial works are undertaken as needed at our depots. Maintenance of an asbestos register for each identified site.
	SafeWork NSW Code of Practice - Labelling of workplace hazardous chemicals (December 2022)	Ensuring all our hazardous substances are appropriately labelled and containers replaced as required. Spot checks and inspections are completed periodically to monitor.
	SafeWork NSW CoP - Managing risks of hazardous chemicals in the workplace (Dec 2022)	Hazardous substances are categorised, and relevant chemicals are isolated and stored appropriately. Extraction fans were installed as deemed necessary. Training is provided to workers on the correct use,

Legislative requirements	Related documents	CDC Application
		storage, and disposal of these substances.  Hazardous Substances register has been developed at a National level of ComfortDelGro Australia, with current registers also maintained at the local level.

## 1.4 Governance

The General Manager OMBSC (GM) of Red Bus CDC has allocated appropriate resources, including a General Manager Health, Safety, Environment and Quality (GM HSEQ) who is the custodian of the EMS.

Red Bus 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 the team maintains high standards; meets legislative requirements; and provides strong, responsive oversight of service delivery and operational effectiveness. This structure:

- CDC's management system is certified under ISO14001, ISO9001, ISO45001 and ISO55001 assuring TfNSW that the highest standards of HSEQ and asset management are ingrained throughout the 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 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, continual improvement is promoted while supporting other management activities to achieve environmental objectives.

Governance is one of the most important factors for ensuring effective environmental and sustainable actions and outcomes. This system employs a practiced 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: Red Bus CDC governance approach.

### 1.4.1 Governance with TfNSW

As shown in Table 2, our governance structure ensures the GM HSEQ and/or GM 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	Red Bus 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: Changes to key personnel. Benchmarking results. Budget planning. Contract amendments. 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: Key performance indicator (KPI) results. New and outstanding root cause analyses identifying appropriate preventative action/s. Post incident review reports. New and existing escalations and plans to resolve.

Meeting	Frequency	Red Bus CDC Attendees	Agenda
			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	Identify environmental opportunities. Share achievements and completed activities. Report progress against EMP commitments. Provide Environmental updates.
Other scheduled meetings	As required	As required	Where governance/other meetings require environmental inputs, Red Bus 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 Red Bus 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 Plan, 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 Manager who is not directly involved in activities but is kept informed.

Table 3: RACI Matrix – EMP.

Responsible	Accountable	Consulted	Informed
R	A	C	I

Task	Role	GM	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Development of Red Bus CDC’s EMP 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		I	I
Leading, managing and building Red Bus CDC’s sustainability programs, activities, and initiatives		C	A	R	R		C	C	
Building Red Bus CDC capability and capacity to meaningfully engage and work with communities, partners, and stakeholders		C		R		I	I		A
Ensure that all staff receive environmental training that is appropriate to their roles including environmental awareness training		C	C	R	R		I	A	
Undertaking onsite environmental audits using an external certified auditor		C	A	R		C			

Task	Role	GM	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 ensure actions are taken to rectify		C	A	R	I	C			
Reporting any significant environmental incidents to appropriate authorities		C	A	R	I	C			
Ensuring that all facilities are maintained and function in a way that is consistent with the Environment Policy and this EMP, including responsible disposal of assets		A	C	I	R	R	I		
MOR 6 – Safety performance indicators (Environmental Incidents) – reported in the daily/monthly operating report		C	A	R	C	C	C		
MOR 7 – Depot Safety and Environmental Inspections		C	A	R	C	C	C		
Establish of an effective and compliant environmental monitoring program		C	A	R	R	C			
Development of an enterprise-wide EMS in accordance with the requirements of ISO14001:2015		C	R	R	C	C	C		
Systematically monitoring and reseal any cracks consistent with risk levels within agreed timeframes		C	A	C	C	R	C		

Task	Role	GM	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Continue to review environmentally friendly bus washing chemicals, ensuring appropriate bunding is in place, oil water separator systems installed with ongoing maintenance plans and water wastage is minimised.		C	A	R	C	C	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	C	C		
Continue to implement existing procedures to manage environmental impacts including reviewing regularly for any potential gaps or improvements in environmental management of storage, use and disposal of solvents.		C	A	R	C	C	C		
Continue to review existing arrangements for oil, tyre, and dry waste recycling to identify improvements and bring the site in line with overall environmental plan requirements.		C	A	R	C	C	C		
Continuing to simplify the EMS and improve governance. The EMS guides all aspects of environmental management across operations.		A	R	C	C	C			

Task	Role	GM	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Continue to maintain depot surrounds including gardens and grounds to encourage native fauna through the selection of native flora.		C	C	C	A	R	C		
Reduce reticulated water use by establishing a rainwater capture and harvesting system.		C	C	C	A	R	C		
Continue to conduct regular waste audits that involve the collection and measurement of various waste types and recycled waste.		C	A	R	C	C	C		
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		I	A	C	R	C	C		
Reduce, reuse, and recycle program and actions including waste, stormwater, soil, groundwater, energy use and emission objectives		I	C	C	A	R	C		
Monitor and maintain the controls as part of the Environmental Aspects Register		C	A	R	C	C	C	I	I
Review Environmental Aspects Register annually (minimum) or as required		C	A	R	C	C	C	C	C
Undertake stakeholder communications relating to environmental actions and activities		C	C	R	C	C			A

Task	Role	GM	GM HSEQ	HSEQ Advisor	GM Asset Mgt	Facilities Manager	Workshop Supervisor	GM People & Culture	GM Shared Services
Maintain and make available the Sustainability Transport Charter on the Red Bus CDC website		C	A	R	C	I	I	C	C

## 1.6 Environmental targets

The *Delivery section* of this EMP details the actions and approach employed by Red Bus CDC to achieve environmental management targets including:

- Delivering value for money by improving the efficiency and yield of fleet and depot assets and prudently balancing financial, environmental, and social sustainability
- Continually reducing, reusing, and recycling at all levels thereby reducing the carbon footprint of OMSBC7 operations on the environment.

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 Aboveground Storage Tanks (AST)	Weekly fuel dips and reconciliation, monthly.	Reconcile fuel usage every month, at each depot.	Ongoing	General Manager Assets
	Fuel line integrity testing, annually.	Undertake one fuel line integrity test, at each depot.	Ongoing	General Manager Assets
	Fuel tank integrity testing, five yearly.	Conduct fuel tank integrity inspection in accordance with inspection and test plan, at each depot.	Ongoing	General Manager Assets
Improve quality of water discharged to trade waste.	Undertake water sampling and analysis, as per agreement.	Undertake water samples, at each depot, as per agreement.	Ongoing	General Manager Assets
	Maintain trade waste agreements, at identified depots.	Maintain currency.	Ongoing	General Manager Assets
Improve quality of recycled water.	Monitor water for legionella, quarterly.	Undertake four water samples, at each depot.	Ongoing	General Manager Assets
Reduce metered water consumption.	Capture, harvest and recycle rainwater.	Conduct a review, retrofitting metres to rainwater tanks.	Ongoing	Sustainability Procurement Manager

Focus Area	Ongoing Monitoring & Measurement	Annual Targets	Status	Role responsible
		Monitor recycled water usage if a metre is installed.	Ongoing	GM Procurement - National
Management of material storage to improve site safety and prevent spills into sensitive areas.	Inspect depot to verify material is appropriately stored and emergency response equipment is available, quarterly	Undertake four safety and environment workplace inspections, at each depot.	Ongoing	HSEQ Advisor
Reduce electric energy consumption for non-ZEB consumption.	Solar panels fitted to reduce reliance on power generated from fossil fuel	Maintain solar panels and monitor performance.	Ongoing	GM Procurement - National
Reduce all forms of waste through recycling.	Monitor volume of waste disposed and/or recycled.	Utilise existing arrangement and monitor changes in waste streams.	Ongoing	GM Procurement - National
Responsible fossil fuel energy consumption.	Monitor diesel consumption, monthly.	Undertake twelve measurements of litres of diesel/100km consumed.	Ongoing	General Manager Assets
Reduce impact on air quality.	Maintain robust maintenance program for vehicles.	Vehicles serviced as per service plan, at each depot	Ongoing	General Manager Assets
	Clean fleet accreditation is maintained, yearly	Clean fleet accreditation certificate is attained and current.	Ongoing	General Manager Assets
Accredited Environmental Management System.	Maintain a robust environmental management system.	ISO14001 certification remains current.	Ongoing	HSEQ Advisor
Management of known asbestos.	Maintain site conditions.	There is no known asbestos or asbestos containing materials.	Ongoing	HSEQ Advisor

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

- Outline achievements from the preceding year
- Detail 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.

The Red Bus CDC Leadership Team drives organisation-wide continuous improvement in environmental management performance.

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

## 1.7 Monitoring and reporting

### 1.7.1 Monitoring

Red Bus CDC is committed to continuously improving environmental performance, ensuring it evolves in line with the changing legislative landscape; the environmental demands of OMBSC7; and the requirements of the customer, the community and TfNSW.

The Shared Services Team is responsible for monitoring all 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.

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

At Red Bus 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 strategic objectives and obligations are met, and that anticipated benefits and outcomes are realised, Red Bus 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 prior to 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 in a safe and lawful manner.

#### 1.7.1.1 Performance data

Data inputs are collected by leading technologies used by the team and managed through Principal Resource and Information Management System (PRIME) and the 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.

Red Bus CDC acknowledges the lead and lag indicators prescribed within the TfNSW daily/monthly operational report/s 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 Red Bus CDC and staff. Communication of objectives and targets at all levels of the organisation, as well as visibility of the metrics, promotes information sharing and reporting. This also provides transparency and increases 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.

Red Bus CDC's strong sense of team is solidified through the recognition and celebration of individual and collective efforts and success. Red Bus CDC celebrates attainment of targets and acknowledges the effort, commitment, and participation of all those who contributed. This is done through several mechanisms.

### 1.7.1.3 Monitoring KPIs with TfNSW

Red Bus CDC reviews performance against KPIs to ensure actions are realised and cost reductions achieved. Red Bus 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

Red Bus CDC has an established, effective, and compliant environmental monitoring program which is implemented on OMBSC7 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 available to the relevant water authority or local council on request.

Monitoring element	Description
Groundwater quality	A trade wastewater agreement is in place with the appropriate local council for OMBSC007. The agreement remained current during the reporting period.  Local Council record a metre read and undertake water testing bi-monthly. No action required
Waste management	Waste masses are recorded by category and reported to the Leadership Team with the goal of making annual incremental reductions.
Greenhouse gas (GHG) emission from operation	GHG emissions from bus operations are recorded. Opportunities to reduce emissions (consistent with KPIs agreed with CDG/global head office) are explored.
General monitoring	General monitoring includes:  Monthly workplace inspections  Ad hoc observations  Incident reports.

### 1.7.1.5 Internal and External Audit Program

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

Red Bus 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 current processes, practices and benchmarks while maintaining a continuous improvement mindset. They also help identify opportunities and hazards and assess risk.

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

Risk audits identify any flaws in the 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. The program and roles of personnel are communicated to staff.

Certified professionals are engaged to conduct external audits to ensure that Red Bus CDC is held accountable to standards/criterion 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 and included in the corrective actions register. Audit results are traceable and documented/communicated to management and relevant teams. Any non-conformities are systemically addressed.

#### Objectives

The key objectives of Red Bus 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

- The critical control framework is effective and that 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, adherence to audit schedules and programs, including the overall results, concerns, and any trends, are reviewed by the Leadership Team at the monthly Safety, Environment and Quality Steering Committee Meeting.

## 1.7.2 Reporting

To ensure accountability for meeting the objectives set out in the EMP, Red Bus CDC reports to TfNSW on compliance in the Quarterly EMP Report. This report details:

- 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
- 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 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, Red Bus CDC will manage the incident and notify relevant emergency services, Transport Management Centre (TMC), regulators and other government agencies, and the nominated contact for the TfNSW Contracts Team in accordance with the TfNSW's Serious Incident Guide (First Five-Minute Protocols).

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

Red Bus 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 the Bateau Bay depot, including structures and activities taking place.

## 1.8.1 Non-Conformance and Corrective Actions

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

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

Red Bus CDC's commitment to continually improving 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 Red Bus CDC's operations.

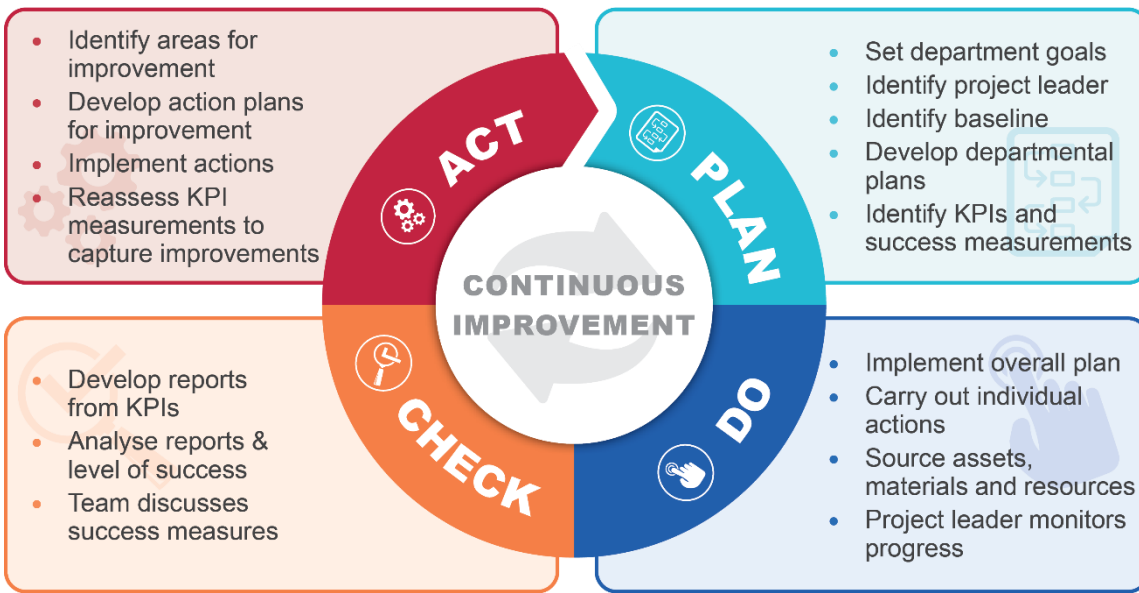


Figure 3: Red Bus CDC's continuous improvement framework.

### 1.8.3 Change Management

Red Bus CDC understands the importance of correctly managing and embedding change. The team has developed a robust approach to change management which aligns with and supports the continuous improvement framework and overall approach to minimising risk and improving services.

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

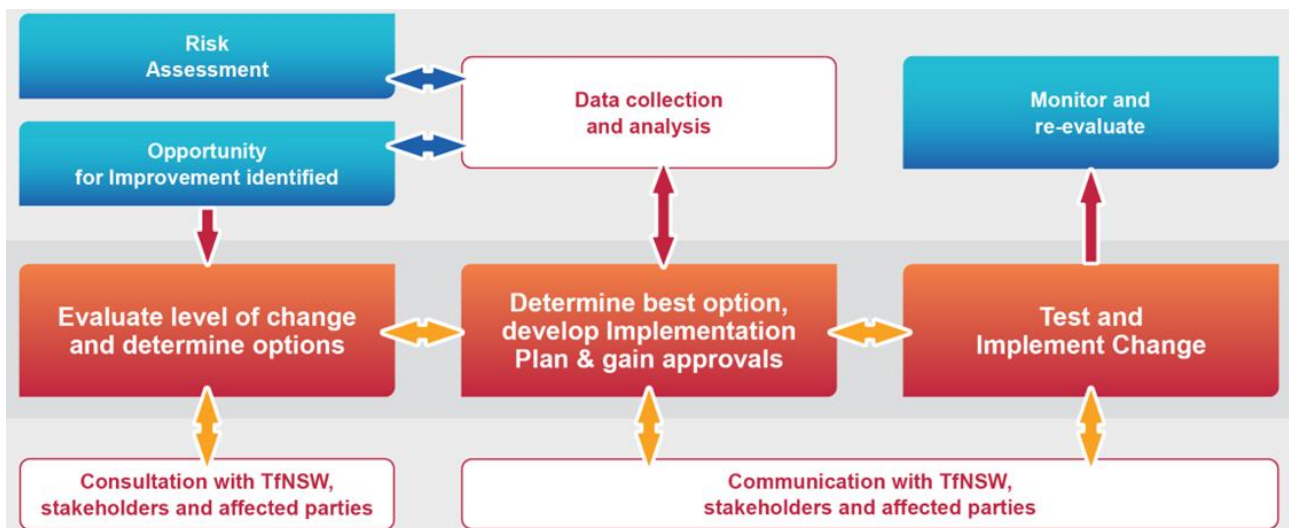


Figure 4: Change management process.

## 1.9 Document Control

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

- OMBSC7 operational environment including services, risks, and community profile/customers.
- Legislative/regulatory changes
- OMBSC7 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 Red Bus CDC policy
- Following the recommendations of any relevant audit

# 2 Delivery

This section outlines Red Bus CDC’s delivery strategies to ensure contractual and legislative requirements are met while promoting robust sustainability and environmental management outcomes including reducing the impact of 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

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

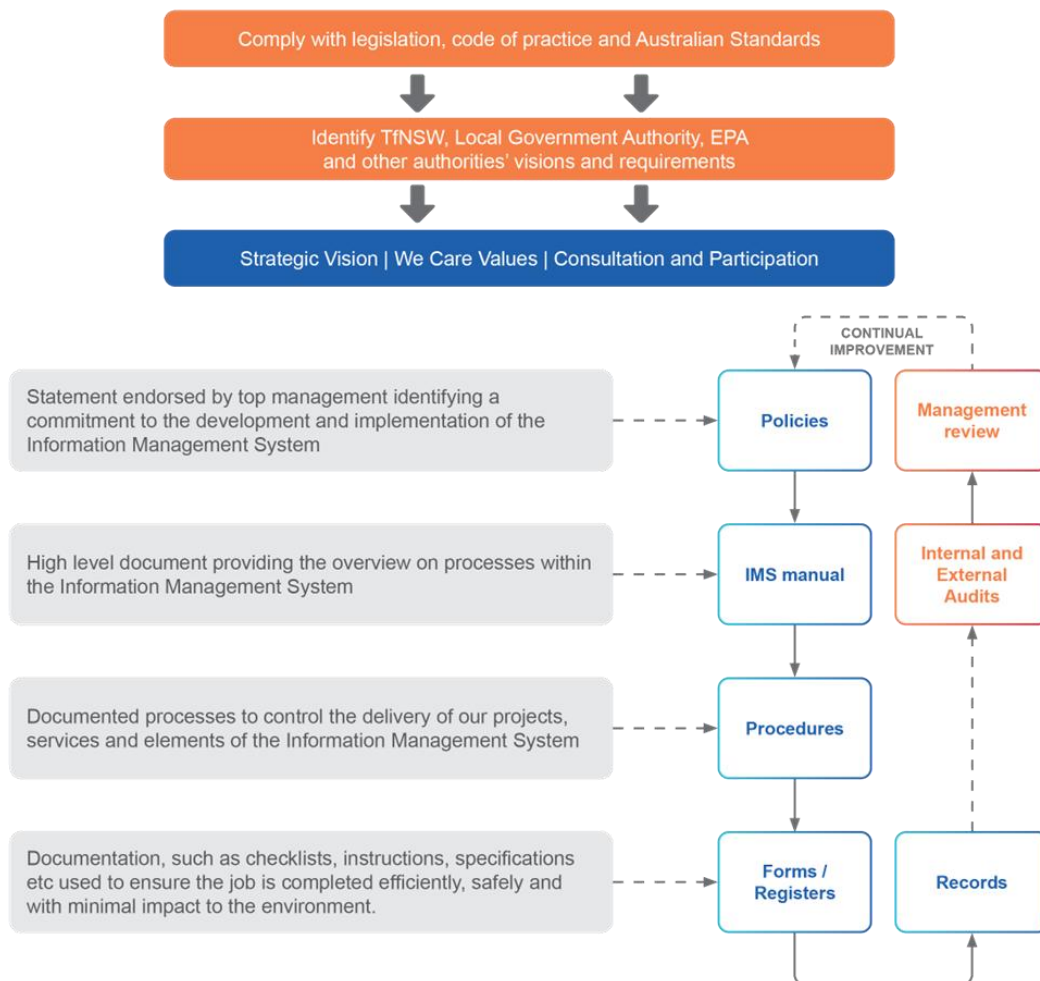


Figure 5: EMS framework.

Key features of the EMS include that it:

- Is designed to improve environmental outcomes.
- Meets 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.
- Is certified and aligned to ISO 14001, as shown in Table 6.

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

Red Bus CDC Certifications and accreditations
BOAS (RMS)
Clean Fleet Accreditation (RMS)

CDC Certifications and accreditations
ISO 14001: 2015 Environmental Management System
ISO 55001: 2014 Asset Management System
ISO 45001: 2018 Safety Management System
ISO 9001: 2015 Quality Management System

## 2.2 Red Bus CDC NSW strategies and policies

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

Red Bus CDC's strategic approach and policies are driven by clear objectives, shared with TfNSW. This includes achieving a transport system that is economically and environmentally sustainable, affordable for customers and supports emissions reductions.

The Red Bus CDC Environmental Sustainability Policy outlines how these objectives are achieved and establishes goals and performance indicators which direct behaviour.

### 2.2.1 The CDC Way

*The CDC Way*, outlined in Figure 6, recognises the importance of aligning people, tools, technology, and processes to provide exceptional customer experiences and meet contractual commitments.

It underpins the Red Bus CDC approach and depicts how these three core components integrate seamlessly to deliver best-in-class services for customers as well as meeting other contractual commitments such as robust environmental management and sustainable operations that minimise impacts.

Through training, on-boarding, and establishing a strong culture, Red Bus CDC ensures the promotion of environmentally aware decision making across the team and as part of all OMSBC7 operations.

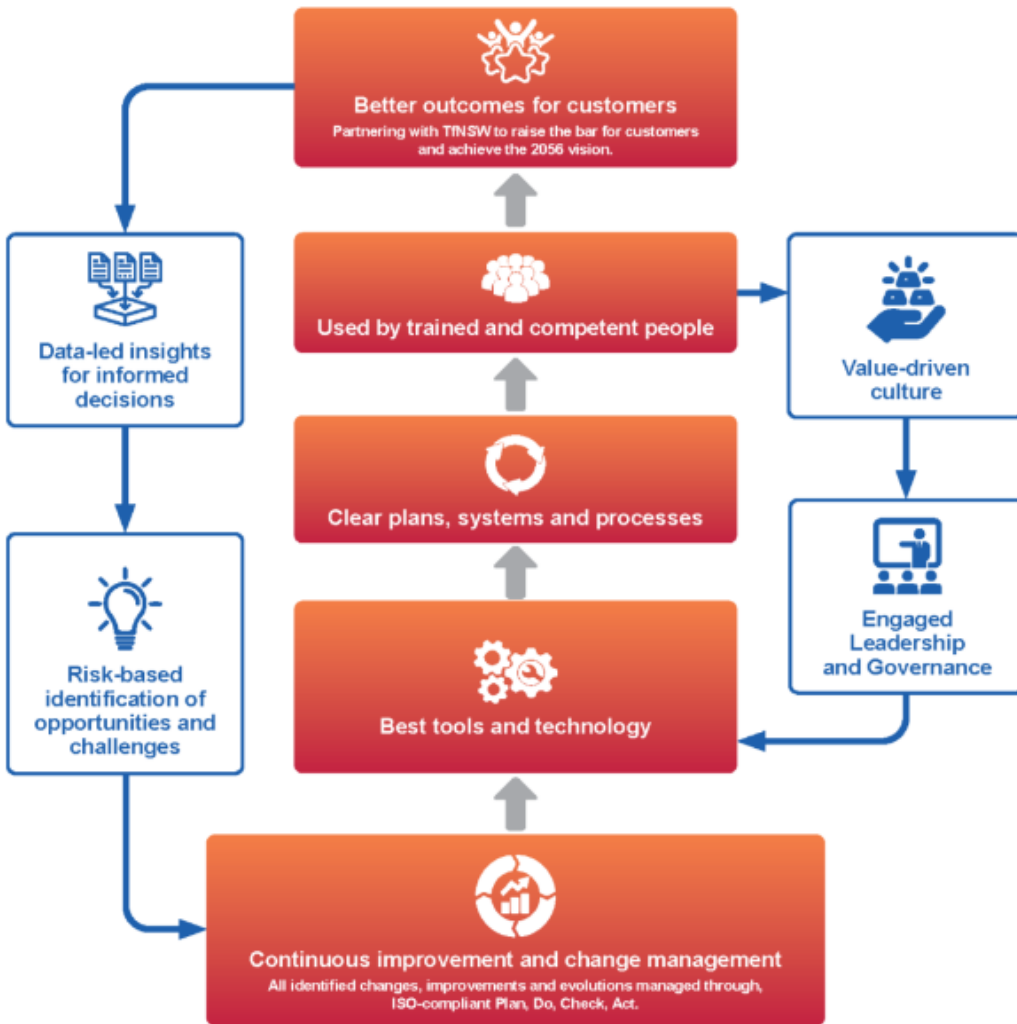


Figure 6: *The CDC Way.*

### 2.2.2 *We Care Values* framework

Red Bus CDC’s *We Care Values* framework (shown in Figure 7) is integral to ensuring high levels of customer satisfaction as well as other outcomes such as those relating to environmental management.

## We Care

**We Care** puts internal and external customers – and their surrounds – at the heart of everything that we do. To achieve this, we integrate customer-driven values across all areas of our business – as we strive to be Australia’s most trusted transport provider.



**We Care for our customers**

Our customers are front and centre of everything we do. We listen and support them to ensure their safety and comfort on every exceptional journey.



**We Care for our people**

Our dedicated people are our greatest asset. Their health, safety and well-being are our top priority. We foster respect, diversity and inclusion.



**We Care for our partners, suppliers, and stakeholders**

We are a trusted business partner. We deal fairly and ethically to build win:win partnerships with TfNSW and our stakeholders



**We Care for our communities**

We respect everyone we serve by promoting inclusiveness, building trust and supporting community initiatives



**We Care for our environment**

We invest in efficient technologies and leverage our global experience to implement sustainable practices



**We Care for our assets**

We are the trusted custodians of State assets. We care for them as if they were our own. We are meticulous in our stewardship of public buses and depots

### We Care Values



**Integrity**



**Authentic**



**Inclusive**



**Positive**



**Purposeful**

Figure 7: The *We Care Values* support the promotion of robust environmental management practices.

## 2.2.3 Environmental Sustainability Policy

Our Environment and Sustainability Policy confirms Red Bus CDC's commitment to minimising the environmental footprint; driving continuous improvement in environmental management and sustainability standards; and ensuring that team efforts reflect the expectations of customers, other road users and the communities we serve.

This commitment is endorsed by ComfortDelGro Australia Chief Executive Officer and Red Bus CDC’s CEO and is made publicly available.

In honouring this commitment, Red Bus CDC:

- Work proactively to prevent pollution incidents, reduce our environmental emissions, and optimise the energy efficiency of all our transport modes.
- 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 assets are well maintained and operate efficiently.
- Working closely with suppliers to drive environmentally responsible procurement.

## Environmental sustainability strategies

Red Bus 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

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

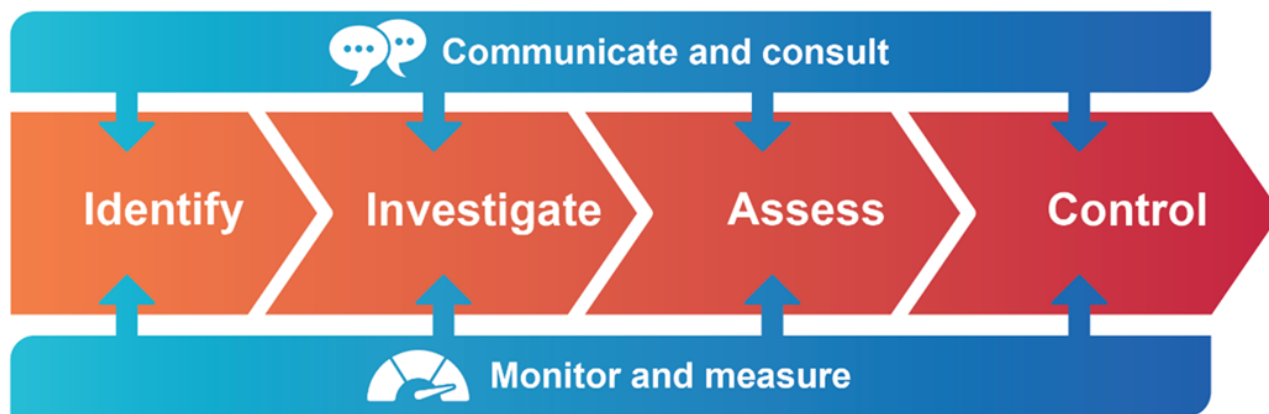


Figure 8: Risk management framework.

### 2.3.1 Service assurance

Red Bus 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 Red Bus CDC's Service Assurance System (SAS). Red Bus 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 review, 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 (see Table 74).

### 2.3.2 Risks in day-to-day operations

A Risk and Opportunities Assessment was conducted for OMBSC7 which details the principal environmental risks and opportunities in the region. This includes the controls and mitigations that have been established to manage these risks. These risks have been integrated into the overall HSEQ Risk Register for consistent implementation.

### 2.3.3 Region-specific risk control measures

Red Bus CDC implements an Environmental Aspects Register for OMSBC7, including structures and activities to ensure all environmental risks are understood and managed. The team conducts an environmental audit, reviews all depot locations and activities, and develops specific actions as detailed in the *below section*.

Table 7: Environmental Aspects Register for OMSBC7.

Responsible	Environmental Aspect	Environmental Impact	Likelihood	Consequence	Significance	Risk Controls
Facilities Manager	Surface groundwater	Introduction of contaminated groundwater into stormwater system.	Unlikely	Minor	Low	<ul style="list-style-type: none"> <li>• Dedicated bus wash area which retains and treats contaminated water prior to discharge.</li> <li>• Trade Waste Permit</li> <li>• Monitoring quality of discharged water to sewerage.</li> <li>• Areas prone to chemical spillage protected by bunds.</li> <li>• Drain wardens used in all stormwater drains</li> </ul>
Facilities Manager	Water consumed cleaning buses	Introduction of contaminated water into the sewerage  Use of scarce resources during dry periods.	Unlikely	Minor	Low	<ul style="list-style-type: none"> <li>• Dedicated bus wash area which retains and treats contaminated water prior to discharge.</li> <li>• Trade Waste Permit</li> <li>• Monitoring quality of discharged water to sewerage</li> <li>• Bus wash system treats and recycles water used for washing buses and cleaning undercarriage.</li> </ul>

Responsible	Environmental Aspect	Environmental Impact	Likelihood	Consequence	Significance	Risk Controls
						<ul style="list-style-type: none"> <li>Primarily use harvested water for bus wash (80,000L capacity)</li> </ul>
Facilities Manager	Energy used to deliver vehicle maintenance	Introduction of pollutants into the atmosphere.	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>Use of natural lighting in workshops</li> <li>LED lighting installed in workshops.</li> <li>Only procure plant that requires turning off when not in use.</li> <li>Solar panels installed on all maintenance roof tops.</li> <li>Daylight switches installed for external lighting across the depot (activation dependent on light level not timers)</li> </ul>
Fleet Manager	Energy used in vehicle operation	Introduction of pollutants into the atmosphere.	Almost Certain	Moderate	High	<ul style="list-style-type: none"> <li>Bus fitted with automatic shutdown.</li> <li>Buses deployed strategically by maximising use of low energy consumption vehicles.</li> <li>Clean Fleet Program</li> <li>5-Star Driver Training Program</li> <li>Monitor fuel consumption exceptions by vehicle.</li> </ul>

Responsible	Environmental Aspect	Environmental Impact	Likelihood	Consequence	Significance	Risk Controls
						<ul style="list-style-type: none"> <li>• Technical Maintenance Plans for buses.</li> <li>• Waste batteries are disposed of through licensed contractor</li> </ul>
Facilities Manager	Energy used in administration of bus services	Introduction of pollutants into the atmosphere.	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>• LED lighting installed in administration offices.</li> <li>• Timers installed on air conditioning (A/C) systems to avoid unnecessary operation.</li> <li>• Timers installed on lighting systems within lunchrooms, storerooms, and offices</li> </ul>
Fleet Manager	Lubricants used in vehicle operation	Use of non-renewable resources Disposal of waste lubricants.	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>• Maximise intervals between oil drains.</li> <li>• Dispose of waste oil through a licensed contractor for the correct treatment of waste.</li> <li>• Disposal of oil filters through licensed contractors</li> <li>• Bunded areas</li> <li>• Use of highest specification of oil to reduce emissions.</li> <li>• Contaminated rags disposed of through licensed contractor</li> </ul>

Responsible	Environmental Aspect	Environmental Impact	Likelihood	Consequence	Significance	Risk Controls
Fleet Manager	Coolants used in vehicle operation	Use of non-renewable resources	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>Use of non-glycol coolant (Organic Acid Technology) to reduce impact on aquatic life.</li> </ul>
Facilities Manager	Paints used and stored	Disposal of waste paint	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>Disposal of waste paint through licensed contractor</li> </ul>
Facilities Manager	Diesel storage and delivery	Introduction of contamination into groundwater Introduction of contamination into ground.	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>Use of both bunded and self-bunded aboveground diesel storage tanks</li> <li>Monitoring the integrity of underground fuel lines</li> <li>Calibration of fuel meters</li> </ul>
Facilities Manager	Tyres used in vehicle operation	Disposal of waste tyres	Rare	Moderate	Low	<ul style="list-style-type: none"> <li>Disposal of waste tyres through licensed contractor</li> </ul>

## 2.4 Environmental training

During induction to Red Bus 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 Red Bus CDC places on environmental management

Table 8 summarises Red Bus CDC's environmental training initiatives.

Table 8: Summary of environmental training.

Module	Training regime	Description
All staff modules	Red Bus CDC induction	History, operations, Red Bus CDC values, and corporate introduction.
	Risk management	Hazard identification, risk assessment and control.
	WHS management	WHS legislation introduction, safety policies, drug and alcohol, incident and 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.
<b>Note:</b> Environmental decision making is a key component of all staff training.		
Drivers' modules	Operation	ECO-driving training, understanding telematics and scorecards, fuel saving strategies, emergency response.
Mechanics' modules	Maintenance	Standard Operating Procedures (SOP) on hazardous waste handling, noise management, heritage protection procedure, air pollution prevention procedure, 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, project management e.g. capital improvement projects.

## 2.5 Communication and stakeholder engagement

Red Bus CDC engages with key stakeholders to ensure there is an understanding of what is important to the communities where services operate and how to best meet their needs. The Stakeholder Engagement Plan is tailored to guide the team on how to continuously learn from stakeholders and build strong, mutually beneficial relationships through a clear and transparent roadmap.

The Communications and Marketing Plan outlines the Red Bus CDC vision regarding how to determine, prioritise and communicate with target audiences to help meet and, where possible, exceed customer needs.

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

The Red Bus 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 practice 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 also continues local community stakeholder engagement programs including attendance at monthly local council committee meetings and ongoing communication with local elected representatives.

## 2.6 Environmental emergency preparedness

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

Red Bus 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 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 articulating the responsibilities of the Red Bus CDC Operations and Customer Centre (OCC). 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, while 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.

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

The approach to crisis/emergency/disruption events is shown in 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.

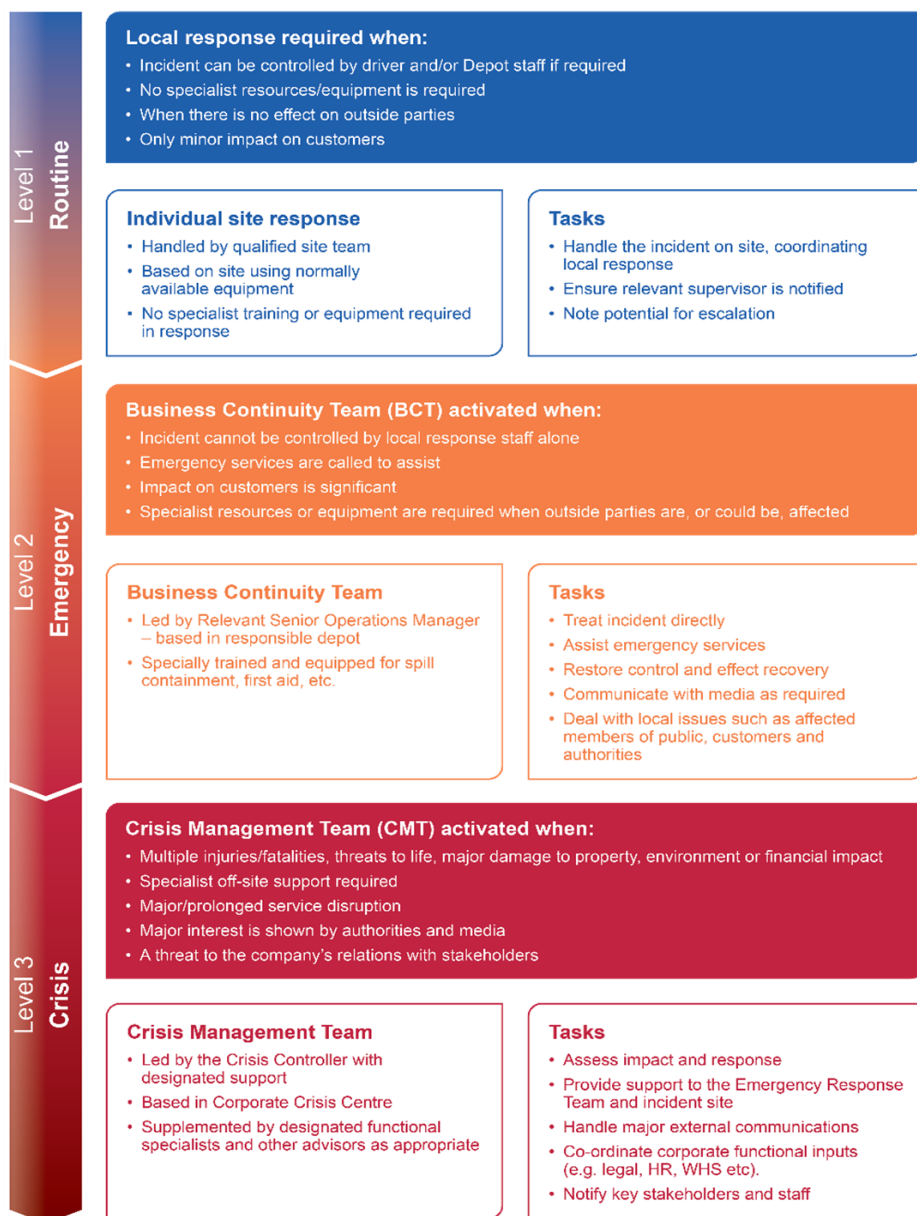


Figure 9: Red Bus CDC’s emergency, disruption, and crisis management approach.

## 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 in response protocols
- All incidents are reported in PRIME, and all level two and three incidents are critically reviewed.

### 2.6.3 Incident reporting

Red Bus 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 Red Bus CDC depots and offices. Generally, these are led by the GM 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 Red Bus 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 Red Bus 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 the continual improvement cycle, ensuring all plans remain current, understood, and relevant. All plans are reviewed annually as part of Red Bus CDC's annual risk management review program.

### 3 Outcomes: Jul 2024 – Jun 2025

Table 9 below outlines the Outcomes of the initiatives that Red Bus CDC had planned for 2024.

Table 9: Summary of Outcomes 2024.

Focus Area	Initiative	Status	Role responsible
Optimise existing bus washing processes to improve water quality.	<ul style="list-style-type: none"> <li>Conduct water quality testing to monitor quality of water discharged as per trade wastewater agreements.</li> </ul>	<p>Bus wash water is treated as part of the recycling process through an oil water separator system. The system is diligently pressure cleaned. The system is designed to automatically discharge recycled overflow to sewer waste on an as needs basis. A fitted metre tracks quantity.</p> <p>Local Council record a metre read and undertake water testing bi-monthly. No action required during the reporting period.</p>	General Manager Asset Management
Storage, use and disposal of paints and solvents across depots.	<ul style="list-style-type: none"> <li>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</li> </ul>	Ensuring safety and compliance, hazardous materials at Red Bus CDC are appropriately stored in secured and/or bunded areas as required by regulations. This proactive	HSEQ Advisor

Focus Area	Initiative	Status	Role responsible
		approach safeguards against potential environmental risks..	
	<ul style="list-style-type: none"> <li>Conduct regular housekeeping inspections</li> </ul>	Housekeeping is maintained daily. Quarterly workplace inspections have commenced. inspection conducted in 2024:  18 <sup>th</sup> September 2024 and 4 <sup>th</sup> December 2024	Facilities Manager
Ensure compliance with <i>Reduce, Reuse and Recycle</i> approach.	<ul style="list-style-type: none"> <li>Separate waste and recycle appropriate materials.</li> </ul>	CDC has strategically consolidated waste service providers under unified contract arrangements. CDC actively manages various waste streams: <ul style="list-style-type: none"> <li>Recycling paper/cardboard: Cleanaway</li> <li>General waste: Cleanaway</li> <li>Waste oil: Australian Waste Oil: Cleanaway</li> <li>Recycling of glass: O'Brien's</li> </ul>	General Manager Asset Management  General Manager Shared Services

Focus Area	Initiative	Status	Role responsible
		<ul style="list-style-type: none"> <li>• Recycling of tyres: Sydney Retreading Services</li> <li>• Recycling of scrap metal: Coastal Scrap Metal</li> <li>• OMSBC007 is serviced by all nominated CDC service providers.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Monitor and measurement of various waste types and recycled waste.</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing efforts focus on enhancing reporting visibility regarding waste categories and masses. The establishment of waste reduction Key Performance Indicators (KPIs) will be explored for 2025, reflecting a commitment to sustainability.</li> </ul>	General Manager Shared Services
	<ul style="list-style-type: none"> <li>• Introduce native plant species in gardens around depots to minimise water consumption</li> </ul>	<ul style="list-style-type: none"> <li>• Nil works undertaken during the reporting period.</li> </ul>	Facilities Manager General Manager Procurement (National)
Monitoring and reporting energy consumption..	<ul style="list-style-type: none"> <li>• Red Bus CDC will 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.</li> </ul>	Periodic reporting undertaken as required..	General Manager Asset Management

Focus Area	Initiative	Status	Role responsible
Accredited Environmental Management System.	<ul style="list-style-type: none"> <li>Maintain a robust environmental management system.</li> </ul>	ISO14001 certification audited, May 2024 and reissued, nil major non-conformances	GM HSEQ

## 4 Key Initiatives: Jul 2025 – Jun 2026

Table 10 outlines Red Bus CDC’s key actions relating to environmental management, consistent with this EMP for OMSBC Region 7.

Table 10: Key environmental Initiatives.

Focus Area	Initiative	Status	Role responsible
Optimise existing bus washing processes to improve water quality.	<ul style="list-style-type: none"> <li>Conduct water quality testing to monitor quality of water discharged as per trade wastewater agreements.</li> </ul>	<p>Bus wash water is treated as part of the recycling process through an oil water separator system. The system is diligently pressure cleaned. The system is designed to automatically discharge recycled overflow to sewer waste on an as needs basis. A fitted metre tracks quantity.</p> <p>Local Council record a metre read and undertake water testing bi-monthly. No action required during the reporting period.</p>	General Manager Asset Management
Storage, use and disposal of paints and solvents across depots	<ul style="list-style-type: none"> <li>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.</li> </ul>	Ensuring safety and compliance, hazardous materials at CDC are appropriately stored in secured and/or bunded areas as required by regulations. This proactive	HSEQ Advisor

Focus Area	Initiative	Status	Role responsible
	<ul style="list-style-type: none"> <li>Conduct regular housekeeping inspections</li> </ul>	<p>approach safeguards against potential environmental risks.</p> <p>Housekeeping is maintained daily. Quarterly workplace inspections have commenced</p>	<p>Facilities Manager</p>
<p>Ensure compliance with <i>Reduce, Reuse and Recycle</i> approach.</p>	<ul style="list-style-type: none"> <li>Separate waste and recycle appropriate materials.</li> </ul>	<p>CDC has strategically consolidated waste service providers under unified contract arrangements. CDC actively manages various waste streams:</p> <ul style="list-style-type: none"> <li>Recycling paper/cardboard: Cleanaway</li> <li>General waste: Cleanaway</li> <li>Waste oil: Australian Waste Oil: Cleanaway</li> <li>Recycling of glass: O'Brien's</li> </ul>	<p>General Manager Asset Management</p> <p>General Manager Shared Services</p>

Focus Area	Initiative	Status	Role responsible
		<ul style="list-style-type: none"> <li>Recycling of tyres: Sydney Retreading Services</li> <li>Recycling of scrap metal: Coastal Scrap Metal</li> </ul> <p>OMSBC007 is serviced by all nominated CDC service providers.</p>	
	<ul style="list-style-type: none"> <li>Monitor and measurement of various waste types and recycled waste.</li> </ul>	<p>Ongoing efforts focus on enhancing reporting visibility regarding waste categories and masses. The establishment of waste reduction Key Performance Indicators (KPIs) will be explored for 2025/2026, reflecting a commitment to sustainability.</p>	<p>General Manager Finance</p>
<p>Monitoring and reporting energy consumption.</p>	<ul style="list-style-type: none"> <li>Red Bus CDC will 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</li> </ul>	<p>Periodic reporting undertaken as required.</p>	<p>General Manager Asset Management</p>
<p>Accredited Environmental Management System.</p>	<ul style="list-style-type: none"> <li>Maintain a robust environmental management system.</li> </ul>	<p>Ongoing accreditation</p>	<p>GM HSEQ</p>

