Greater Sydney Bus Contract 9
ENVIRONMENTAL MANAGEMENT PLAN – YEAR 2

Version control

Date	Version Number	Author	Comments
10/1/22	1.0	Uwe Krueger	Initial draft
22/4/22	2.0	Uwe Krueger	Updated to include feedback from TfNSW
7/3/2023	3.0	Uwe Krueger	Updated as per Schedule 5, contractual requirements
26/4/2023	4.0	Uwe Krueger	Updated to incorporate TfNSW comments
11/8/2023	5.0	Uwe Krueger	Updated to incorporate TfNSW comments and comments from MD

Approval Box

Action	Responsible Person
Reviewed by	Managing Director

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Compliance matrix

Clause	Contract requirements (Schedule 5 of the Contract)	Reference in this document
A12(a)	The Operator must develop, implement, maintain and comply with its Environmental Plan from the Planned Service Commencement Date and for the duration of the Service Term	Section 8.1
A12(b)	The Operator must annually review the Environmental Plan and make such amendments as may be required to ensure ongoing compliance with Law and this Contract.	Section 8.1
A12(c)	The Operator must prepare and submit to TfNSW a draft of the Environmental Plan in accordance with paragraph 4 of this Schedule covering the relevant forthcoming Contract Year which must	Section 8.1
A12(c)(i)	be generally consistent with or address the environmental system requirements set out in ISO 14001 'Environmental Management System – Specification with guidance for use	This Plan, Section 2.4.1
A12(c)(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	Attachment 1, Section 6
A12(d)	The Operator must publish its Environmental Plan on its website and make it available to passengers, upon request, free of charge	Section 8.1
A12(e)	The Operator must report on its compliance with its Environmental Plan to TfNSW quarterly in Quarterly Environmental Plan Reports in accordance with paragraph 8.6 of this Schedule	Section 8.1
A12(f)	If requested by TfNSW, the Operator must demonstrate that it has appropriate environmental management systems in place	Section 2.4

Definitions

Term/acronym	Definition
CNG	Compressed Natural Gas
Contract	Contract for the Provision of Bus Transport Services
Depot	Inclusive of Waverly, Port Botany and Randwick
STA	State Transport Authority
EEV	Enhanced Environmentally-friendly Vehicle
EMS	Environmental Management System
EPA	NSW Environment Protection Agency
ERP	Emergency Response Plans
EV	Electric Vehicle
HSEQ	Health, Safety, Environment and Quality
HSSEQ	Health, Safety, Security, Environment and Quality
HVAC	Heating, Ventilation and Air Conditioning
ISCA	Infrastructure Sustainability Council of Australia
LED	Light Emitting Diode
OCC	Operations Control Centre
NSW	New South Wales
RMS	Roads and Maritime Services
SDS	Safety Data Sheet
LT	Leadership Team
TJHB	Transdev John Holland Buses (NSW)
TfNSW	Transport for NSW
TDA	Transdev Australasia Pty Ltd
UPSS	Underground Petroleum Storage Systems
ZEB	Zero Emission Bus

1. Introduction

1.1. Contract overview

Public bus services create vital links across Sydney, providing connections between residential areas, transport and employment hubs, recreation facilities and essential community services. Greater Sydney Bus Contract 9 (GSCBC9 or Region 9) is one of 14 bus contracts operating in the Greater Sydney Region. Transport for NSW's (TfNSW) objectives for Region 9 form part of a wider vision to lift the standard of transport across Sydney by identifying and implementing new, creative and better ways of delivering public transport–making it faster, safer and easier for people to travel to their desired destination.

Region 9 Services not only link people with places; they also support TfNSW's goals of reducing traffic congestion and carbon emissions, as set out in Future Transport 2056, and the NSW Government's target of achieving net zero emissions by 2050. The transition to a Zero Emission Bus (ZEB) fleet will play a critical role in achieving these goals and creating the cleaner, greener and healthier future that the NSW Government envisions for the people of NSW. In recognition of the importance of this transition, the Minister for Transport and Roads has challenged TfNSW to replace the state's existing fleet of 8,000 buses with zero emission technology by 2030. Transdev John Holland Buses NSW (TJHB) is committed to leveraging our global zero emission expertise to support TfNSW and the NSW Government to achieve their vision.

1.1.1. Contract objectives

The NSW Government's objectives for Region 9 are to:

- Deliver transport journeys and related customer services that are safe and reliable for passengers, staff and the public.

- Provide a coherent and consistent customer experience that will promote greater patronage and modal shift.

- Support strategic, whole of network planning to improve the end-to-end transport journey customer experience, service delivery and integration of public transport services in Sydney.

- Enable a smooth and seamless transition from the current contract to the new contract.

- Maintain flexibility in the contract arrangements to address future growth and changes.

- Deliver value for money by improving the efficiency and yield of fleet and depot assets and prudently balancing financial, environmental, and social sustainability.

1.1.2. Network overview

The Region 9 coverage map is shown in Figure 1. Region 9 Services operate predominantly in the CBD and Eastern Suburbs areas. Its routes enable people to get to jobs, education, health, and leisure activities by serving:

- Key commercial and retail areas such as the Sydney CBD, Bondi Junction, Newtown, Mascot, Darlinghurst, Pagewood, and Sydney Airport

- A number of secondary and tertiary education facilities including University of NSW, University of Sydney, and University of Technology Sydney

- Major health precincts such as St Vincent's Hospital, Royal Prince Alfred Hospital, Sydney Children's Hospital, Prince of Wales Hospital and East Sydney Private Hospital

- A wide range of residential areas from harbour side communities to public housing estates

- Key tourism and sporting destinations including Sydney Opera House, the Rocks, Sydney Harbour foreshore, Moore Park, Centennial Park, Randwick Racecourse, Sydney Football Stadium, Sydney Cricket Ground, and the eastern suburbs beaches

Figure 1: Region 9 coverage map

- Region 9 currently carries over five million customers every month. Network 2020 will substantially change how services are delivered to these customers and play a key role in the integrated transport network for the Sydney metropolitan area. Region 9 includes connections to the entire Sydney Trains network, the complete Sydney Ferries network at Circular Quay, L1, L2 and L3 of the Sydney Light Rail, together with adjoining bus networks

- The regional transport network will continue to evolve in the coming years, through the introduction of initiatives including Sydney Metro CBD & Southwest, the WestConnex motorway, Sydney Gateway, and the proposed Western Harbour Tunnel and Beaches Link project. When combined with the service delivery and technology initiatives being identified and progressed through Future Transport, such as On Demand transport and automated vehicle trials, Region 9 is a dynamic operating environment that demands exceptional operational acumen

- Contract Depots are located at Randwick, Waverley, and Port Botany.

1.1.3. Services

As the Operator for Region 9, TJHB delivers a range of Services as defined under the Contract including:

- Route Services, i.e. timetabled services

- Dedicated School Services

- Headway Services

- Special Services, including Emergency Bussing (unplanned replacement of other transport modes), Event Services, Planned Rail and Metro Replacement, and Eastern Beaches Summer Supplementation.

To achieve the above services, TJHB maintains fleet and fixed assets as required under the contract.

Note: This does not include environmental planning and assessment in the context of the Environmental Planning and Assessment

1.2. Purpose of this Plan

This Environmental Plan (EMP) outlines the approach and initiatives that TJHB will implement on the Region 9 network to minimise harm to the environment and make sustainable and efficient use of physical and financial resources. This Plan articulates the ways in which we will work in partnership with TfNSW to achieve our shared environmental objectives.

This Plan – which is guided by Transdev Group's manifesto, shown in Figure 2 – describes our environmental vision and management system for the Region 9 network. It is based on three main levers:

- Strict compliance with state and federal environmental laws

- Efficient control of the impact that we have on the environment and the communities we serve through the implementation of an ISO 14001 accredited Environmental Management System (EMS) and Transdev's Growing Responsibly Framework (discussed in Section 1.2.1)

- The active management of any State, Sydney Water or local government environmental permits or consents.

Figure 2: Transdev Group manifesto

1.2.1. Environmental management driven by corporate social responsibility

TJHB's focus as a business is driven by the impact, we have on the environment around us. This is detailed in our approach to Corporate Social Responsibility (CSR). For Region 9, TJHB will embed our approach to CSR into every aspect of our operations and broader business. By using TDA's Growing Responsibly Framework, illustrated in Figure 3, we will adopt a comprehensive approach to social and environmental issues to achieve our environmental sustainability objectives for the Contract.
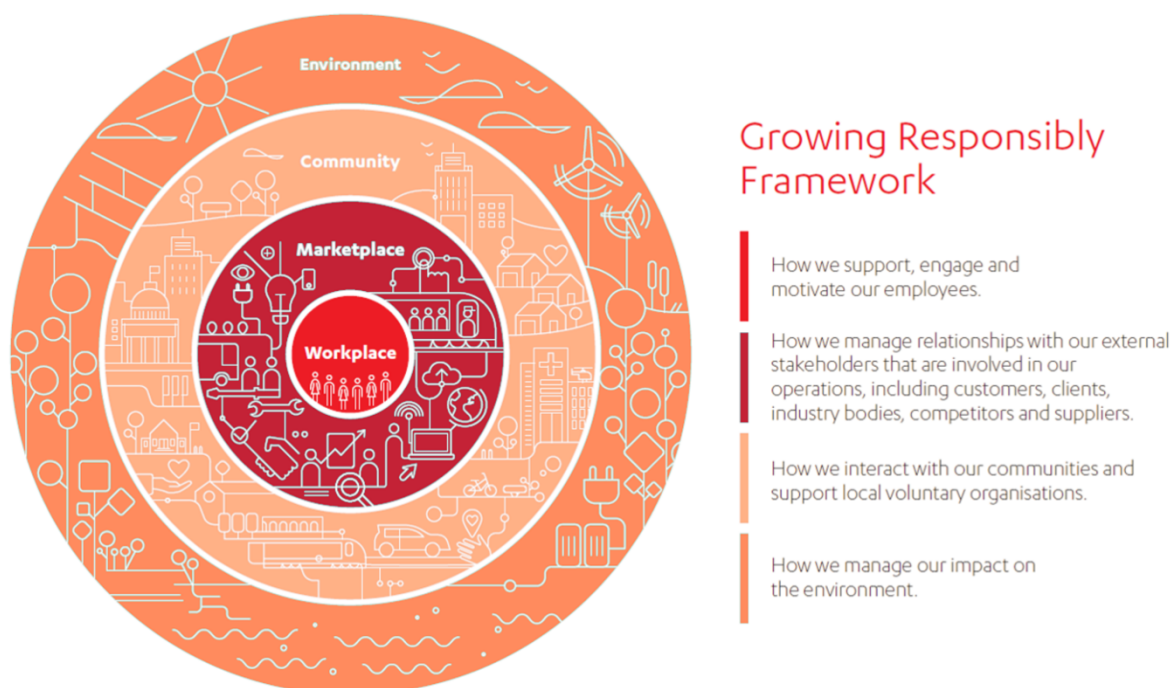
Figure 3: TDA's Growing Responsibly Framework

The Growing Responsibly Framework is underpinned by TDA's CSR strategy, Growing Responsibly. The strategy sets out the things we will do to achieve Transdev Group's vision of becoming the public transport leader in social and environmental performance in Australasia and globally. Growing Responsibly aligns with ISO 26000 and aims to:

- Raise awareness and developing a culture of social and environmental performance

- Assess and improve our operations from a sustainability perspective

- Encourage collaboration with other departments, our clients, and stakeholders to integrate sustainable principles.

1.3.   Plan objectives

The objectives of this Plan are guided by Transdev Group's manifesto and overarching vision for environmental management. The objectives of this Plan are to:

- Support the achievement of TfNSW's environmental objectives (detailed in Section 1.3.1)

- Outline and control the environmental impacts, aspects and opportunities that are likely to arise from the Contract

- Establish TJHB's services and processes with due regard for the environment

- Ensure delivery of key performance areas, as outlined in the Contract

- Demonstrate TJHB's ability to apply our experience, skills, and capabilities to achieve ISO 14001 accreditation for our Region 9 operations.

- Map the planning to achieve and maintain ISO 14001 accreditation

- Establish the framework to gain, actively manage and retain the required environmental authorisations, permits and consents.

The achievement of these objectives will be underpinned by the implementation of an EMS aligned with ISO 14001. Emphasising this commitment and maintaining our industry-leading standard, TJHB is using the Transdev Australasia EMS. TJHB's Accreditation audit is scheduled for 25-26/9/2023.

1.3.1.   Alignment with TfNSW

As shown in Figure 4, we have mapped these objectives against the objectives articulated in the TfNSW Statement of Commitment to Environment to demonstrate the alignment of our approach.

Transdev's Objectives	TfNSW Objectives
We provide safe, efficient and innovative public transport while maintaining a clean environment by: Preventing pollution (air, soil, water) Minimising waste generation Preserving our natural resources. **Minimise Impact**	• Energy and resource management: We are efficient in our energy use, reduce our greenhouse gas emissions and use less water • Pollution control: We keep air, noise and water pollution to a minimum • Climate change resilience: We build and operate to withstand the effects of climate change • Minimise impacts: We minimise transport impacts on biodiversity and heritage • Liveable communities: We aim to sensitively integrate transport infrastructure and movement with the way people live and work on the land • Corporate sustainability: We are resource efficient in all our day to day functions.
We improve environmental practices with the goal of meeting or exceeding all environmental regulatory requirements. **Plan**	TfNSW aims to achieve good transport outcomes that support the projected growth of the NSW economy
We promote the highest level of environmental excellence and sustainable development through dedicated internal and external communications. **Improve**	TfNSW strive for continuous improvement in their approach to environmental management.

Figure 4: Alignment of environmental and sustainability objectives

1.4. Interface with other Plans

As shown in Table 1, this EMP interfaces directly with a number of other Plans. Table 1 identifies the Plans from which the EMP receives input and where the outputs from this Plan are used to guide our approach in other areas of the business.

Table 1: Cross-reference table for this plan

Environmental Management Plan (initial plan)	Input from	Output to
Customer Experience Plan	●	
Data Management Strategy	●	
Workforce and Industrial Relations Plan	●	●
Operational Management	●	●
Service Planning	●	●
Disruption Management Strategy	●	●
Asset Management Plan	●	●
Safety Management System	●	●
Stakeholder Engagement Plan	●	●
Transition Plan	●	●
Innovations Plan (including Zero Emission Bus Strategy)	●	●
Sustainability Plan	●	●
ZEB Proposal/Plan	●	●

2.   Background and context

2.1.   Needs and expectations of stakeholders

TfNSW's RFP and contract requirements for environmental management are summarised in the Compliance Matrix above. Compliance obligations in relation to the needs of other stakeholders have been outlined in Section 4.2.

Figure 6 Identifies the nature of stakeholders in relation to Region 9 and Figure 6: Needs and expectations of interested parties.

Figure 5 Stakeholders

Key Destinations

Tourist Destinations: Sydney Opera House, Royal Botanic Garden Sydney, Art Gallery of New South Wales, Sydney Cricket Ground and Sydney Football Stadium, The Entertainment Quarter, Centennial Parklands, Coogee Pavilion, Royal Randwick Racecourse, Australian Golf Club, New Sou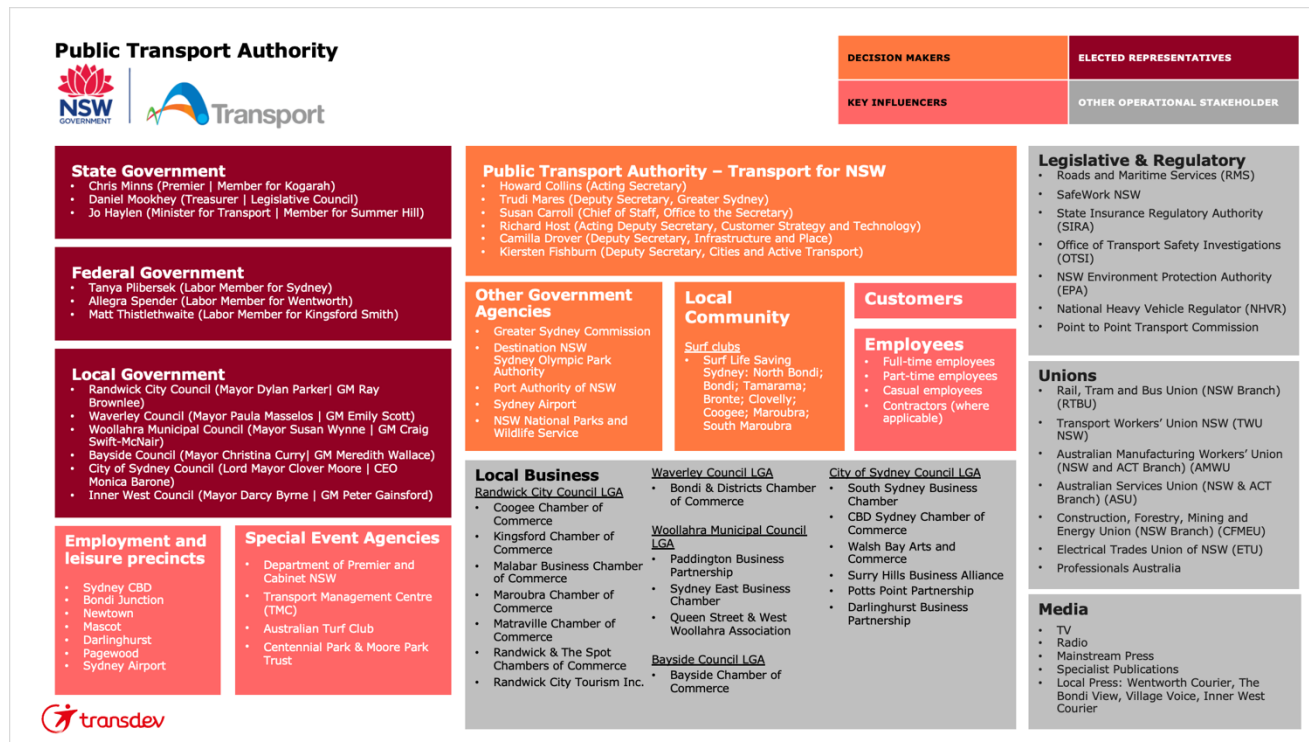th Wales Golf Club, Port Botany, NSW National Parks (Hornby Lighthouse – Sydney Harbour National Park, Malabar Headland National Park, Kamay Botany Bay National Park), City of Sydney Council (The Rocks, Sydney Harbour foreshore, Moore Park, Sydney Park, Sydney Town Hall, the Domain, Observatory Hill Park, Paddington Reservoir Gardens), Woollahra Municipal Council (Woollahra Oval, Nielsen Park, Rushcutters Bay Park), Waverley Council (Coastal Walk, Waverley Cemeteries, Campbell Parade artworks, Bondi Pavilion), Randwick City Council (Heffron Park, La Perouse Museum)

Beach Destinations: Woollahra Municipal Council (Double Bay, Seven Shillings, Rose Bay, Milk, Shark, Parsley Bay, Kutti, Gibsons, Wharf, Camp Cove, Lady Bay), Waverley Council (Bondi, Tamarama, Bronte), Randwick City Council (Clovelly, Coogee, Maroubra, Malabar, Little Bay, Congwong, Little Congwong, Frenchmans, Yarra Bay)

Key Contractors and Suppliers

Accredited Heavy Vehicle Training, Air Brake, Ampol, Autoplex, BSMS Security, BusTech Group, COS, Mercedes-Benz Buses & Coaches, MN Spraybooths & Industrial Spraying, Multispares, New Start, O'Brien Glass, Peter J Ramsay & Associates, Poseidon Technologies, Pride Inclusion Program – ACON, Retriever Towing, Scania Australia, Super Start Batteries, Tribal Warrior, Tyres 4U, Valvoline, Volgren, Volvo, Wales Bus Repairs, Western Sydney Repair Centre, Workskil, WSP Australia Pty Limited, Yara Australia

ZEB Specific: ABB Australia, Direx Solutions, Engie, Remondis, Ultegra, Volgren, REA Global

Recruitment Groups: Career Trackers, Explore Careers, Asylum Seekers Centre, Fitted for Work

Accessibility Groups

Accessibility Transport Advisory Committee (ATAC), Hueman Equity Consulting

NGOs: Guide Dogs NSW/ACT, Vision Australia, Blind Citizens Australia, The Deaf Society, Black Dog Institute, My Choice Matters – Surry Hills, Holdsworth Community – Woollahra, Inala – Miroma Watson's Bay

Employment Groups: AimBig, Flourish Australia, Social Traders, APM Disability Services (Bondi Junction, Eastgardens, Botany, Surry Hills), Disability Services Australia – Mascot Business Services, Break Thru People Solutions

Council Groups: Access Advisory Committee (Randwick City Council), Waverley Access Committee, (Waverley Council), Inclusion (Disability) Advisory Panel (City of Sydney Council), Access Advisory Committee (Inner West Council)

Emergency Services

TfNSW Authorised Officers, RMS Traffic Control, NSW Police Force, Fire and Rescue NSW, NSW Ambulance, NSW State Emergency Service

Project Partners

Lynxx, Liftango, Hastus, Orion

Other Transport Users

Cycling Groups: Cycling NSW, Bicycle NSW, BIKESydney, BIKEast
Pedestrians: Pedestrian Council of Australia
Motorists: NRMA

Education Institutions

Primary: Woollahra Public School, Our Lady of the Rosary Catholic Primary School Kensington, Bellevue Hill Public School, St Charles' Catholic Primary School Waverley, Gardeners Road Public School

Secondary: Sydney Boys High School, Sydney Girls High School, Moriah College, Randwick Boys High School, Randwick Girls High School, Rose Bay Secondary College, Matraville Sports High School

Tertiary: University of New South Wales, University of Sydney, University of Technology Sydney, TAFE NSW (Randwick, Eora, Ultimo Campuses), National Institute of Dramatic Arts (NIDA), University of Notre Dame Australia, Torrens University Australia, Kenvale College, Macleay College

Other Transport Operators

Transdev Sydney, Transdev Sydney Ferries, NRMA, Sydney Metro, Sydney Trains, NSW TrainLink, Transit Systems, Transdev NSW, State Transit Authority (subject to change), NSW Taxi Council, Roads and Maritime Services (RMS)

Community Transport: City of Sydney Council (City of Sydney Community Transport and Access Sydney Community Transport), Randwick Waverley Community Transport, Holdsworth Community Transport, Connect: Inner West Community Transport Group, South Eastern Community Connect (SECC)

Car/Ride Sharing: Flexicar, GoGet, Car Next Door, Uber ANZ

Traditional Owners/Aboriginal Groups

Traditional Owners: Gadigal and Bidjigal People (Randwick City Council, Waverley Council), Gadigal and Birrabirragal People (Woollahra Municipal Council), Gweagal, Bidjigal and Gadigal Clans (Bayside Council), Gadigal of the Eora Nation (City of Sydney Council), Cadigal and Wangal People (Inner West Council)

Aboriginal Groups: Aboriginal Employment Strategy (AES), AFL SportsReady, Clontarf Foundation, NSW Indigenous Chamber of Commerce (NSWICC) La Perouse Local Aboriginal Land Council (LPLALC), Metropolitan Local Aboriginal Land Council, NSW Aboriginal Education Consultative Group, Ampol Reconciliation Advisory Group, Supply Nation, Reconciliation Australia

Council Groups: Eastern Region Local Government Aboriginal and Torres Strait Islander Forum (ERLGATSIF), Aboriginal Advisory Committee (Randwick City Council), Aboriginal and Torres Strait Islander Sub-Committee (Bayside Council), Aboriginal and Torres Strait Islander Advisory Panel (City of Sydney Council), Aboriginal and Torres Strait Islander Advisory Committee and Reference Group (Inner West Council)

Employment and Leisure Precincts

Sydney CBD, Westfield Bondi Junction Shopping Centre, Newtown Culture Precinct, Green Square and Mascot Station Precinct, Camperdown-Ultimo Health and Education Precinct, Darlinghurst Business Area, Westfield Eastgardens, Randwick Health and Education Precinct, Sydney Airport, Double Bay Shopping Precinct, Moore Park Sport and Entertainment Precinct, Port Botany Amenities and Employment Precinct

Other Government Agencies

Greater Sydney Commission, Destination NSW, Sydney Olympic Park Authority, Health Infrastructure NSW, NSW Department of Planning, Industry and Environment, NSW National Parks and Wildlife Service, Department of Defence

Local Community

Major Property Developers: Sydney Airport, NSW Ports, Longhurst Group (Edgecliff Centre), Meriton (Bondi Junction Interchange)
Surf Clubs: Surf Life Saving Sydney (North Bondi, Bondi, Tamarama, Bronte, Clovelly, Coogee, Maroubra, South Maroubra)
Senior Groups: National Seniors Australia – Sydney East branch

DECISION MAKERS	ELECTED REPRESENTATIVES	KEY INFLUENCERS	KEY STAKEHOLDER FOR SERVICE CHANGE LIAISON	OTHER OPERATIONAL STAKEHOLDERS

Figure 6: Needs and expectations of interested parties

2.2. Reference documents

In developing our approach for Region 9, we have drawn on and reviewed the resources provided by TfNSW through the Data Room and other key NSW Government publications, as shown in Figure 7.
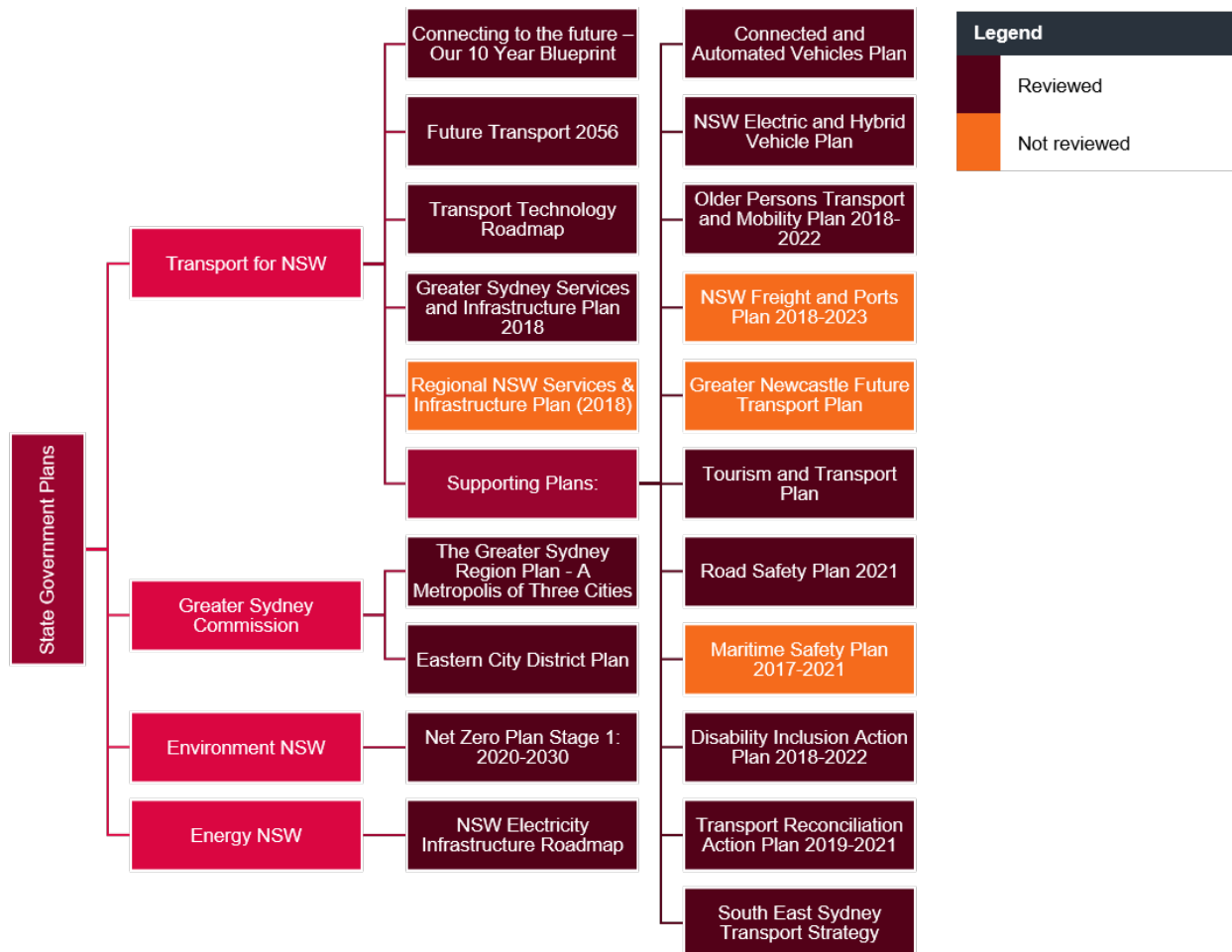

Figure 7: NSW State Government Plans

In line with the *National Environment Protection Council Act 1994*, we have also carefully considered the following National Environment Protection Measures in our response:

- Ambient air quality
- Air toxins
- Grid electricity
- Diesel and Compressed Natural Gas (CNG) vehicle emissions
- Movement of controlled waste between states and territories
- National pollutant inventory
- Used packaging materials
- Assessment of site contamination
- Climate change adaption.

2.3. Leadership and commitment

TJHB commits to integrating sound environmental management practices into our activities, and to establishing superior environmental standards across our business. The following policy guides our activities in the areas of environment and sustainability:

- Environmental Policy (Attachment 1)
- Climate Change Policy (Attachment 2).

2.4.   Environmental planning and management

Through this Plan and our EMS, we will implement, maintain, and improve robust environmental management practices which ensure we:

- Conduct business activities in an environmentally sound and responsible manner

- Identify, monitor, and manage environmental risks

- Minimise the environmental impact of the network's operation and maintenance, as well as enhance beneficial social and economic impact on local communities – while simultaneously providing exceptional customer service

- Facilitate compliance with legislative requirements and national and international standards, including ISO 14001

- Assess and monitor environmental impacts, or potential impacts, arising from our operations – and continuously improve our environmental management.

The EMS establishes the overarching principles as well as the environmental standards and procedures required to manage the environmental integrity of the Region 9 network. We will fulfil these requirements through the approach shown in Figure 8.
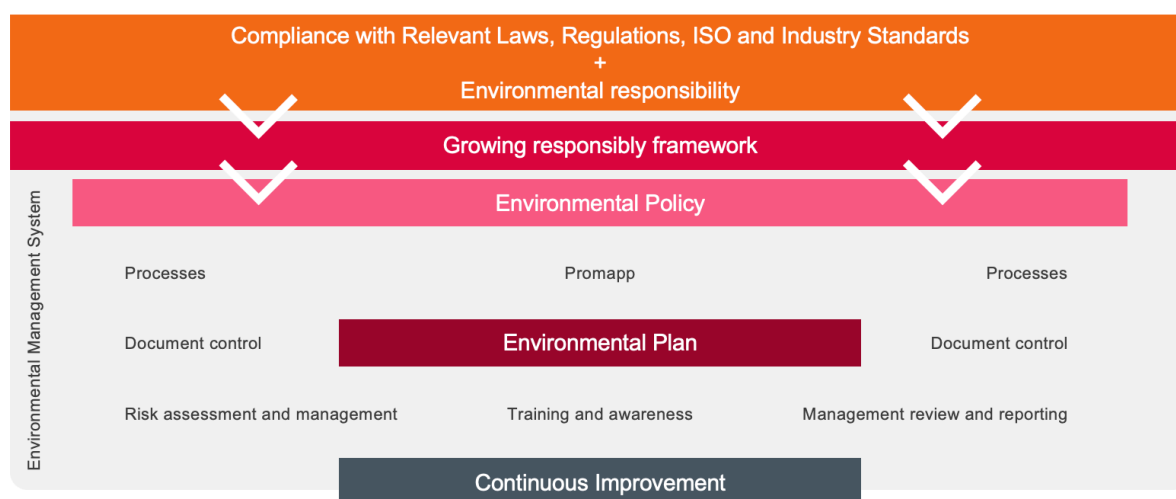
Figure 8: Our environmental management approach

2.4.1.   ISO 14001:2015 accreditation

TJHB will gain ISO 14001:2015 certification for our Region 9 operations within 18 months of the Service Commencement Date. Figure 9 depicts the high-level steps that will be undertaken to achieve certification.
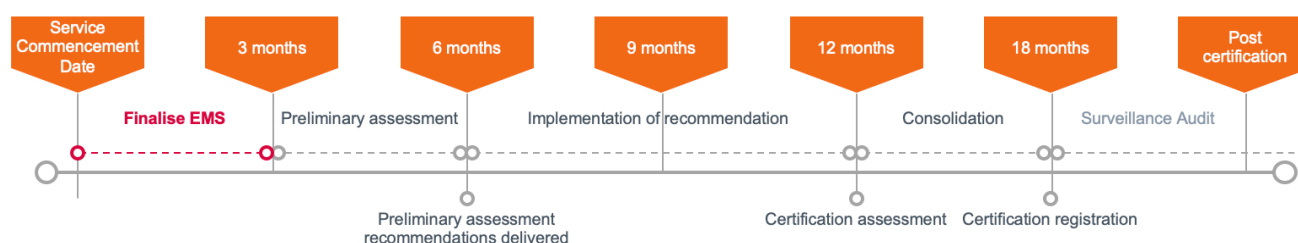
Figure 9: Timeline for gaining ISO 14001:2015 certification

A summary of how this Plan aligns with the ISO 14001 requirements is included as Attachment 3.

2.4.2.   Clean fleet accreditation by Roads and Maritime Services

TJHB will maintain the existing Roads and Maritime Services (RMS) Clean Fleet accreditation for Region 9 to support the Region 9 fleet's emission standards beyond May 2021. At the writing of this plan, TJHB has submitted their Clean Fleet application, which was subsequently accepted.

2.5.   Roles, responsibilities, and authorities

All TJHB employees and subcontractors have an obligation to maintain responsible environmental work practices. It is a condition of employment that all personnel comply with our environmental procedures and applicable legal requirements when carrying out their duties.

2.6.   Organisational structure

This section describes the organisational structure for environmental management and how reporting lines will work. Figure 10 shows the organisational structure.
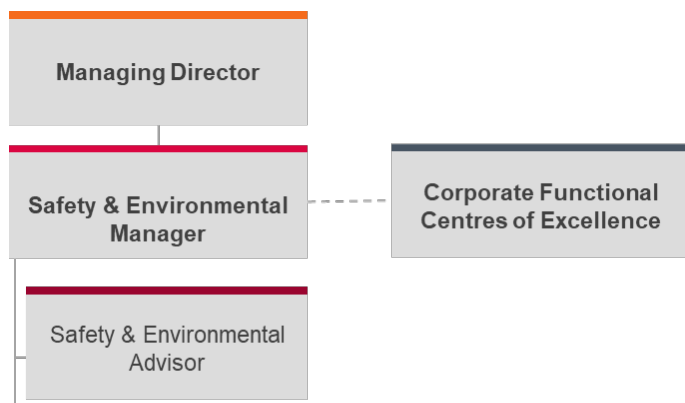
Figure 10: Organisation structure for the Region 9 Environmental Team

The organisational structure outlines the functional area of accountabilities, roles and assigned personnel. The Managing Director has appointed the Safety and Environmental Manager as the management representative to develop and maintain our EMS, with the cooperation of all managers – ensuring all associated policies, plans, and procedures are adequate and reasonably practicable. Environmental responsibilities will be incorporated into all position descriptions.

Table 2 outlines environmental roles and responsibilities for Region 9. All of our employees and subcontractors will be encouraged to advance environmentally positive practices and empowered to constructively intervene if they witness harmful acts.

Table 2: Roles and responsibilities

Roles	Responsibilities
Managing Director	• Oversees effective implementation of this Plan • Ensures there are sufficient resources allocated to deliver the objectives and initiatives outlined in this Plan • Verifies that services and processes are planned, transitioned, and delivered with due regard for environmental considerations • Champions environmental and sustainability leadership.
Safety & Environmental Manager	• Develops the environmental improvement strategy and plans for the business • Models environmental and sustainability behaviours • Builds organisational environmental capability – by providing training, coaching, and mentoring to personnel in the use of environmental processes and practices • Monitors and reports on environmental objectives, opportunities, and initiatives • Ensures environmental impacts and aspects are monitored and the controls are adhered to • Works in partnership with stakeholders to deliver programs to address identified areas of improvement • Verifies emergency response arrangements are in place • Identifies environmental risk and opportunity.

Roles	Responsibilities
Safety & Environmental Advisor	• Ensures environmental objectives, opportunities and initiatives are implemented • Monitors environmental impacts and aspects, and ensures controls are adhered to • Works with and monitors the environmental management and controls of subcontractors • Implements, communicates, and monitors the initiatives, processes and processes defined in this Plan • Implements controls to minimise risks and enhances opportunities • Conducts internal environmental auditing and coordinates external environmental auditing.
Head of Assets	• Ensures that the facilities are operated and managed in a way that minimises harm to the environment and makes efficient use of resources • Verifies that the facilities are maintained in accordance with environmental related contractual and legislative requirements • Monitors KPI performance benchmarks and strives to reach performance targets • Owns environmental accountabilities • Supports the Asset Team to deliver environmental standards.
Head of Service Delivery	• Ensures that the services are operated and managed in a way that minimises harm to the environment and makes efficient use of resources • Owns environmental accountabilities • Supports the Service Delivery Team to deliver environmental standards.
Line managers	• Plan and assess tasks, always looking for the best environmental options • Monitor team activities to ensure that environmental standards are maintained, and improvement opportunities are identified and acted on • Constructively intervene in any harmful act/s • Ensure all hazards, near misses and incidents are reported and feedback is provided to the originator on the subsequent action • Recognise positive environmental standards and actions.
All employees	• Engage in the environmental programs implemented by TJHB • Ensure their behaviour or omissions do not cause environmental harm • Report hazards, near misses and incidents in a timely manner • Share knowledge and opportunities with their teams and with TJHB as a whole.
Subcontractors	• Plan and assess tasks, always looking for the best environmental options • Adhere to TJHB's environmental requirements • Report hazards, near misses and incidents in a timely manner

Roles	Responsibilities
	• Work in partnership with TJHB to identify and deliver environmental opportunities.

3. Risks and opportunities

3.1. Climate change adaption and climate risk declaration

The NSW Government released its Climate Change Policy Framework in 2016 with the aim of maximising the economic, social and environmental wellbeing of NSW in the context of a changing climate, and current and emerging international and national policy settings and actions to address climate change.

The City of Sydney declared a climate emergency in June 2019, stating that climate change poses a serious risk to the people of Sydney.

The consequences of climate change are being felt in Australia already. These include:

• The average surface air temperature has increased by 0.9°C since 1910, leading to more very hot days and fewer very cold days. The decade from 2008 to 2017 was the hottest on record, while 2017 was the hottest year in NSW

• Bushfire season has lengthened, and the type of extreme weather that commonly creates conditions for bushfires has increased

• The sea level has risen at a rate of 3.2mm a year for the past 20 years.

Climate change will increasingly affect the environment and society in every part of the state. Business, government, and communities can plan appropriately to manage the effects of new climate conditions with the help of the NSW Government.

Potential climate change hazards and proposed adaption measures are outlined in Table 3.

Table 3: Potential climate change hazards and proposed adaptation measures

Hazard	Affected	Description	Proposed adaptation measures
Temperature and the incidence heatwave	Bus passengers	Increase in the incidence of extreme heat (>35°C) can put additional pressure on air conditioning and affect passenger thermal comfort. Passengers waiting at bus stops would be exposed to higher temperatures.	• Conduct regular air conditioning maintenance, particularly before and during hot weather conditions.
Temperature and the incidence of heatwave	Operations and maintenance staff	The incidence of extreme heat can cause an unsafe work environment, worker discomfort, and lost work time.	• Undertake maintenance activities early in the morning or late afternoon, or cancel such activities during extreme heat (>40°C) • Uphold TJHB's workplace health and safety standards • Undertake regular educational campaigns and ensure personal protective equipment is refreshed periodically
	Electrical supply	Extreme heat can put stress on the electrical supply, which could result in widespread blackouts and affect network capacity	• Ensure that spare diesel bus fleet can cover loss of ZEB charging capability

Hazard	Affected	Description	Proposed adaptation measures
Severity of seasonal drought	Natural environment	Vegetation at Depots may be impacted by drought over the life of the asset	• Plant native vegetation which is heat and drought tolerant for erosion control • Implement measures to protect, conserve and restore the natural environment
	Natural environment	Increasing temperatures caused by climate change may result in an increased spread of pests and weeds, which could damage the local ecosystem and vegetation	• Undertake periodic maintenance and clearing of weeds • Monitor complaints as they relate to vegetation management
Severe rainfall resulting in flood	Bus Depots	Depot associated infrastructure and access inundated due to higher and more frequent floods resulting from climate change. Operations are disrupted as a result	• Emergency procedures are implemented and all employees are aware of their responsibilities • Emergency Management Plan and processes.
Rainfall intensity and frequency	Bus Depots	The current drainage may not be adequate to cope with increased storm/rainfall intensity, which may cause localised flooding	• Undertake periodic maintenance to inspect for drainage damage after incidence of extreme rainfall
Storm events and intensification of winds	Bus Depots and public roads	Intensity and frequency of high winds may damage buildings. Falling structures and trees/branches may cause debris and damage to power lines	• Ensure appropriate setbacks for vegetation and clear debris, as appropriate within the depot boundaries as required • Emergency Management Plan and Business Continuity Plan

3.2.   Environmental risk management

TJHB manages the environmental impacts of our operations and maintenance activities through a process of environmental hazard identification, risk assessment and operational controls. Activities, products, and services that may cause significant environmental risk are identified through:

• Risk workshops with relevant stakeholders and interested parties

• Completion of a hazard report form

• Notification to the safety and environment team

• Review of the Aspects and Impacts Register

We undertake risk management for the Contract in line with our risk management policy and standard. The key risks relevant to this Plan are summarised in Table 4. We have developed an environmental risk register (aspects and impacts), including:

• Identifying any additional risks

• Agreeing on consequences and likelihood ratings

• Controls

• Mitigating and addressing any identified control gaps so far as is reasonably practical.

Table 4: Key risk management controls

No.	Risk description	Management controls
1	Remediation of contamination	• Management of contamination caused or disturbed by Operator Activities • Containment and/or remediation of existing contamination not caused or disturbed by Operator.
2	Air pollution from the operation of buses combusting diesel fuel and CNG	• Minimising emissions by maintaining the fleet to OEM requirements • Maintaining Clean Fleet accreditation to assure third party oversight of emission control systems • Replacing bus fleet with emission reducing technology, e.g. Zero Emission Buses (ZEBs).
3	Accidental oil, fuel or chemical spill – soil and water resources polluted as a result of our activities or previous contractor activities	• Baseline environmental assessments of all three depots • Storing oils, fuels, chemicals, and hazardous materials in designated facilities/areas in accordance with the design intent of these areas – including any segregation requirements • Maintaining all oil, fuel, chemical or hazardous material storage facilities/areas to ensure they are in good condition and operating effectively – including any placarding, emergency response directions, spill containment and spill response infrastructure and equipment • Maintaining oil and fuel dispensing equipment to ensure spill prevention measures like breakaway connections in fuel bowsers are in a serviceable condition • Maintaining a register and Safety Data Sheet (SDS) for all oils, chemicals and hazardous substances stored or used in a location easily accessible to TJHB employees and Emergency Services during an emergency • Regularly inspecting storage areas/facilities to ensure they are in good condition and that materials are appropriately stored to prevent spills, leaks, fires, or other environmental incidents • Reporting all serious incidents of environmental harm in accordance with TJHB-02-PRO-0063 - Respond to a Reportable Incident • Immediately containing and cleaning up any spills or discharges of oils, chemicals, or hazardous waste, and reporting them according to the Incident Response Procedure. Any contaminated materials generated through a spill incident – including spill response equipment or materials, but excepting soil – will be considered hazardous wastes, and handled, stored, transported, and disposed of according to TJHB-02-PRO-0069 - Control a Containment (Spill) (TJHB) • Investigating any pollution incidents or near misses to identify the cause and the corrective action – including reviewing procedures, upgrading facilities or equipment and/or raising awareness of personnel, as required.
4	Employee or subcontractor exposure to asbestos or soil contamination	• Asbestos registers • Access permit and permit to work system, process and approval in place prior to any work carried out in areas or equipment where asbestos has been identified • Training for all employees and subcontractors who perform work in or around asbestos and contaminated soil as required • Prior to any work carried out in areas or equipment where asbestos has been identified to undergo awareness training • Signage: Asbestos warning.
6	Accidental oil, fuel, or chemical spill as a result of our activities – minimised spread	• Baseline environmental assessments of all three depots • Reporting any new notifiable activities to be undertaken during operations that are not included under existing approvals, permits or licences • Undertaking regular inspections of areas and facilities for storage and handling of oils, chemicals and hazardous materials to identify if contamination has occurred

No.	Risk description	Management controls
		• Managing any contamination observed on land, or occurring through operations, according to the Incident Response Procedure • Appropriately storing chemicals and materials to reduce likelihood of accidental spill • Providing spill kits to address accidental oil/lubricant spill including on-road response vehicles • Providing fire protection equipment to address ancillary risk of fire due to spill.
7	Environmental incident following natural disaster Hazardous liquid or solid substance spilled onto land or water following fire or flooding	• Actively checking for any hazardous substance spills resulting from the incident, as required by TJHB-02-PRO-0069 - Control a Containment (Spill) (TJHB) • Establishing and maintaining maintenance practices to ensure vehicles meet minimum vehicle operating standards – lowering likelihood of hazardous substances escaping • Operations Control Centre (OCC) to notify Emergency Services if hazardous substance spill occurs following a natural disaster • Providing fire protection equipment to address ancillary risk of fire due to spill.

8	Bush fire, flooding, or other natural disaster
	Equipment or vehicle fire:
	• Component or equipment failure leads to explosion or fire on the vehicle
	• Inadequate storage of flammable or high-pressure substances within the depot leads to fire or explosion
		• Emergency and Crisis Management Plan
		• Network response systems: shutting down network and inspecting for damage to infrastructure or vehicles once safe to do so
		• Employee training regarding incident response, including:
		  • Driver to report and take vehicle out of service if there is a functional irregularity
		  • Procedures for in-service vehicle faults
		• Maintenance: Periodic maintenance checks of electrical equipment and batteries
		• Emergency and Crisis Management Plan as well as the Business Continuity plan
		• Liaising with Emergency Services
		• Periodic maintenance
		• Compliance to design standard for Depot storage and containment of dangerous substances
		• Warning signs/decals on cabinets
		• Provision of fire extinguishers within easy access.

9	• Vehicle wash contamination • Sump water condition and system leaking • Odour or hazardous liquids or gases developing due to poor operations and maintenance practices	• Depot specific environmental baseline assessments were performed within the first three months of the Service Commencement • As part of the asset condition review, the condition of wash plant and further developing maintenance plans for assets depending on asset condition review report discussion with TfNSW • Enhancing maintenance following the Service Commencement Date to ensure the vehicle wash is functioning and not presenting an environmental risk • Periodic checking of the wash plant to ensure there is no environmental contamination.
10	Major fuel and CNG tank leakage	• Preventative maintenance through the Depot Maintenance Plan • Implementing inspection and testing regime for fuelling facilities.

Whilst the above represent key risks, TJHB has a set of risk registers covering safety, operations, environment as well as a corporate risk register. The environmental risk register (aspects and impacts) allocates a risk owner for every risk to ensure that all actions are tracked. The risk owner will hold responsibility for ensuring management controls are implemented and operating effectively

as part of business-as-usual activities. The Safety and Environment Manager manages the overall risk management system and registers and ensures that, where appropriate, environmental risks are escalated to the Senior Leadership Team.

The TDA Enterprise Risk Management Standard TDA-02.STD.0004 is being followed. As TJHB's is aligned with the TDA Risk Management Standard, TJHB will be adopting the standard.

3.3.   Opportunities

While the identification of risk across all aspects of the Contract is a priority, procurement of the Bus Services provides a range of opportunities to positively position the Region 9 network and promote community and environmental benefits. Table 5 sets out our key environmental initiatives and expected benefits/opportunities.

Table 5: 's key environmental initiatives and expected benefits

Initiative	Description	Benefits/opportunity
Introduction of ZEBs	The replacement of aging diesel and CNG buses with ZEBs charged with renewable energy will have a dramatic effect on GHG emissions reduction and local air pollution.	• Supports TfNSW to reduce GHG emissions to more than the required 35% by 2030 • Dramatically increases air quality in the operational area • Reduces noise • Demonstrates TfNSW's environmental leadership in leading by example by replacing Sydney's bus fleet with electric vehicles.
Solar energy generation	Installation of solar panels and potentially batteries in Depots.	• Generation of electrical energy from solar power will reduce the GHG emissions from the use of grid electricity, and will also reduce electricity costs • Batteries charged by solar electricity will further reduce electricity costs.
Journey Maker Awards	Annual awards that celebrate employees who epitomise Transdev's credo and values.	• Recognises employees who contribute positively to 's cultural development • Promotes the right behaviour and celebrates success.
Journey Maker Scorecard	The Journey Maker Scorecard, which is driven from the Transdev Engineering Centre of Analysis (TECA) system is used to improve operational safety and sustainable performance outcomes. The scorecard measures: Telematics data, e.g. speeding and idling Eco driving, e.g. coasting and harsh braking.	• Encourages safer driving on the network and in the Depot • Reduces accidents and injuries • Allows Drivers to better understand their performance • Lowers absenteeism due to accidents • Reduces insurance premiums.
Employee app	An Employee app allows employees to complete safety reporting forms online – enabling our people to become more mobile, access the EMS more readily, and report hazards and incidents in a timely manner.	• Facilitates immediate dissemination of critical environmental and safety information • Provides employees with a more convenient way to give feedback on identified issues.
Camms.Risk incident, audit and risk management system	Camms.Risk is an integrated cloud-based platform for managing all aspects of Health, Safety, Environment and Quality (HSEQ) risks and incidents.	• Allows to align risk management with our business strategy and embed our 'Think Risk' culture across everything we do • Enables environmental performance and improvement plans to be data driven with clear accountabilities.

Initiative	Description	Benefits/opportunity
Chemwatch Gold FFX	Chemwatch is the web-based system will use for Region 9 to manage hazardous substances.	• Provides easy access to SDS • Can be updated when an SDS is updated or about to expire • Allows chemicals to be reviewed before purchase • Provides access to chemical risk assessments • Creates hazardous substances and dangerous goods compatibility reports, labels and manifests.
Rapid Induct	TJHB's visitor and subcontractor web-based management and control platform.	• Supports TJHB to efficiently maintain compliance with environmental requirements • Allows subcontractors and their employees to complete online inductions to ensure they can work safely on TJHB sites.
Promapp document control tool	TJHB will use Promapp to document all key process for Region 9 to ensure these processes can be consistently delivery. This is particularly important where the step is related to the delivery of a critical risk control measure.	• Creates and centralises an online knowledge repository • Facilitates building, improving and sharing process knowledge • Turns complex process maps, Visio charts and procedural documents into clean, simple process maps • Provides simple communication and governance to help teams absorb the constant changes to their roles • Enables a meaningful line of communication directly with process owners to support collaboration from idea inception to implementation.
Uniform Recycling	TJHB have identified a QLD-based supplier that has the ability to recycle uniforms	• Removing uniforms from landfill • Converting uniforms in cellulose and polyester chips for reuse in other products

Note: Some of the initiatives might require environmental approval. The Safety and Environment Team will manage the identification and management of any approval requirements.

4. Compliance obligations

4.1. Environmental law

TJHB understands and will meet the requirements of the EPA NSW laws, including:

- *Protection of the Environment Operations Act 1997* (the EPA Act)
- Protection of the Environment Operations (General) Regulation 2009
- Environmental protection policies made under the EPA Act
- EPA, 2009 Contaminated Sites: Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997
- EPA, 2007 Contaminated Sites: Guidelines for the Assessment and Management of Groundwater Contamination
- Any restrictions or conditions that a granted licence, permit or consent is subject to, for example Trade Waste Permits by Sydney Water to discharge wastewater into the sewer system.

Note: legislative compliance obligations are captured in the Legal and other Requirements register (TJHB-22-FRM-0244)

4.2. Compliance

We comply with the environmental responsibilities set out in the applicable legislation and regulations. We identify, monitor, and disseminate changes to legislation that impact our operations and network. The Safety and Environmental Manager is responsible for keeping up to date with any changes in legislative and regulatory requirements, determining their consequential impact on the business, and communicating any changes across the business.

Legal and other requirements are identified in TJHB-22-FRM-0244 - Legal and Other Requirements Register. The Safety and Environment team will receive a weekly newsletter from Workplace Safety Australia and Workplace Enviro Australia. The Safety and Environmental Manager will review relevant changes in the newsletter and assess the impact to the business. If there are any changes identified, the manager will update the Monthly Business Review Report and update the registers accordingly. We will review the registers as required and assess legal compliance during this review.

TJHB uses the following services to monitor and manage legislative requirements:

- Workplace Enviro Australia Enviro Matters Environmental News Alert
- SAI Global (Australian/New Zealand Standards, ISO Standards).

TJHB has established and maintains a Legal and Other Requirements Register to keep track of the latest legislation and regulations relevant to our EMS procedures. This will be in line with the guidelines set out in ISO 14001. This register is consist of a list of regulations which affect our operations directly.

5. Support

5.1. Environmental leadership

Environmental issues at quarterly HSEQ Leadership Team meetings. Emerging environmental issues will also be raised at weekly leadership meetings, as required.

5.2. Competency and awareness

5.2.1. Environmental awareness

Delivery of sound environmental management is a key component of operations and maintenance activities. We will achieve this by upskilling our employees to become aware of environmental and sustainability issues and to develop an understanding of each employee's accountabilities in this area. During Year 1 of the Contract, we focussed on some basic environmental awareness, such as waste disposal and spills, identifying that we need to increase awareness levels regarding environmental management via posters and articles to raise environmental awareness commencing with uniform recycling in year two. In year one, Remondis has performed a waste audit, and TJHB plans to convert the pending recommendations.

5.2.2. Inductions

All new bus operators undergo extensive training that covers relevant environmental aspects such as:

- Environmental Policy
- Environmental incident management, risks and actions required to minimise the risks to the environment
- Noise management
- Incident reporting

TJHB will implement additional formal training and inductions based on training needs analyses

5.2.3. Specialist environmental management training

In Year One, TJHB revised the diesel and CNG fueller training that will be rolled out in Year Two.

Where required, TJHB will provide specialised training to new employees who:

- Deal with hazardous substances
- Operate new or major plant

5.2.4. Subcontractors

Subcontractors engaged by TJHB go through the induction process. With the introduction of Rapid Mobil, Subcontractor being transitioned to the electronic platform that also contains an online contractor induction package. All subcontractors will be responsible for adhering to our policies as a condition of their contract. We will regularly audit the activities of our subcontractors as part of implementing the EMS. Audits will be conducted in line with the Audit Procedure. Further details regarding subcontractor management are provided in Section 6.8.

5.3. IT systems

Table 6 lists the IT systems that we will use to support the achievement of our environmental objectives.

Table 6: IT systems that will support environmental sustainability

Systems	Function
Camms.Risk	Camms.Risk is an integrated cloud-based platform for managing all aspects of HSEQ incidents including: - Incident reporting - Incident management and classification

Systems	Function
Promapp procedure mapping and document control tool	We will use Promapp to document all key processes steps within the business, ensuring their consistent delivery – particularly where the step is related to the delivery of a critical risk control measure. It is currently used in both of our New Zealand rail franchises and is being introduced across all Transdev Australasia businesses as the main document control tool. It is a business process management software that: • Creates and centralises an online knowledge repository • Facilitates building, improving and sharing process knowledge • Turns complex process maps, Visio charts and procedural documents into clean, simple process maps • Provides simple communication and governance to help teams absorb the constant changes to their roles • Enables a meaningful line of communication directly with process owners to support collaboration from idea inception to implementation. Operational management will be supported by robust process plans to be used in Promapp. This will ensure consistency when managing the network, dealing with network issues, and handing serious incidents.
Rapid Induct	Rapid Induct is our subcontractor management and control platform. It is a web-based platform that supports us to efficiently maintain compliance with environmental requirements and allows subcontractors and their employees to complete online inductions to ensure they can work safely on our sites. Modules include: • Prequalification – inclusive of environmental and sustainability elements • Inductions • Insurance – certificate of currency.
Chemwatch Gold FFX	We use Chemwatch Gold FFX to manage hazardous substances. This web-based system allows us to: • Access SDS and make updates when an SDS is updated or about to expire • Review chemicals before purchase • Access chemical risk assessments • Create hazardous substances and dangerous goods compatibility reports, labels and manifests.
Fileserver	A file server is used to store documents and records. The initial plan to use SharePoint as the web-based platform to use for the storage and control of all documents was abandoned as Microsoft as a library limit of 5000 files after which reords disappear.]
TECA telematics Note: to be implemented in end of Q2 or beginning of Q3 2023	TECA delivers the data that drives our Driver performance management tool – the Journey Maker Scorecard. The TECA telematics system captures acceleration, braking, fuel use and speed for each trip, enabling us to support our Drivers by identifying opportunities for safer and more efficient driving.
Facilities management tool INFOR EAM	Transdev's facilities management tool: • Lists Depot related fixed assets • Allows preventative asset management plans to be set up for each group and individual asset item • Tracks reactive works for each group and individual asset item • Contains contractual and legislative compliance requirements. Infor is a task and workflow system used to ensure that all scheduled maintenance tasks are carried out maintenance and other requirements.

5.4. Communications

5.4.1. Internal communications

TJHB encourage our employees to be environmentally aware, report environmental hazards the same as safety hazards, and openly discuss environmental issues and environmental aspects associated with the operation and maintenance of the Region 9 network.

For Year Two, TJHB plans to roll out communications around

- Uniform recycling
- Waste management
- LED upgrade project

Depending on the content and context, TJHB will communicate with employees through the Employee app, newsletters, notice boards and town hall meetings.

5.4.2. Public communications and stakeholder engagement

TJHB engages with Region 9 stakeholders and the local community, as effective engagement leads to better business and better outcomes for all. The environment is one of the focus areas for stakeholder engagement. Our Stakeholder Engagement Plan outlines our understanding, approach and planned initiatives for stakeholder engagement and communication during the operation of the Contract.

We aim to support TfNSW to achieve the vision set out in TfNSW's Net Zero Plan Stage 1: 2020-2030.

In Year One, TJHB undertook a survey and established that TJHB is eligible for the NSW Government grant to replace old lights with modern LED lights to achieve energy savings. The implementation is planned for Year Two.

5.4.2.1. Complaints

Environmental complaints received directly through the TfNSW Information Line or the EPA will be recorded in the Customer Relationship Management system, and referred to the Safety and Environmental Manager, along with any other relevant managers. Complaints will be recorded in Salesforce and in addition with CAMMS Risk where the incident is investigated operationally in line with the complaints and incident management process.

6. Strategies for operational control

Our activities interact with the environment on many fronts. In Region 9, our major interaction with the environment is in the form of vehicle use and maintenance activities. Secondary to this, is our use of office equipment and office buildings for the day-to-day servicing and administration of the business. Our environmental impacts include, but are not limited to:

- Air pollution through vehicle emissions
- Contamination
- Fuel use
- Electricity
- Noise pollution, primarily caused by vehicles moving through suburban areas
- Vibration
- Water and energy use
- Waste production/resource management such as oils, lubricants, coolant, contaminated water, paint fumes, paint dust when sanding Vehicles, as well as solid waste such as tyres, packaging and paper
- Erosion and sedimentation
- Flora and fauna.

TJHB has undertaken a waste audit via its waste contractor in year one and plans to review and implement relevant actions.

TJHB monitors the waste report received from their waste contractor to identify items to be diverted from landfill.

6.1.   Discharges to air and air pollution

In line with TDA's commitment as a sustainable mobility company, we see our GHG emissions and air pollution as the biggest environmental impact that we strive to reduce. Transdev Group has set targets for countries to reduce GHG emission intensities and reduce tail pipe air pollution by increasing the share of low emission/alternative fuel vehicles and optimising energy consumption.

To achieve this, individual Region 9 sites will have:

- Detailed plans for the gradual replacement of the diesel bus fleet with ZEBs
- Maintenance plans and pre-start bus inspections to ensure emission exhaust systems operate to OEM standards
- Driver training and assessment programs to ensure energy-efficient and sustainable driving.

Other discharges to air resulting from operations and maintenance activities on the Region 9 network include, but are not limited to:

- Odour from maintenance activities, including painting and use of chemicals such as thinners or hardeners
- Odour from storage tanks
- HVAC filter cleaning.

6.2.   Soil pollution

Region 9 Depots have historically used Underground Petroleum Storage Systems (UPSS). Recently, the environmental soil pollution risk has been recognised by STA and the underground storage diesel tanks, associated underground fuel lines and underground waste oil tanks have been remediated.

The latest soil and water pollution assessments by qualified environmental consultants are detailed in Table 7.

Table 7: Soil and water pollution assessments

Site name	UPSS status and remediation	Soil contamination status	Groundwater Contamination status	Contamination controls	Documented detailed controls
Port Botany Depot	UPS tank ST removal and replaced with aboveground, self-bunded 80kL tank	Multiple soil contamination studies done since 1998. LNAPL contamination with natural degradation.	LNAPL plume beneath removed UPSS and chassis wash bay	Ongoing groundwater monitoring Active skimmer programs in place	WSP Groundwater Monitoring Event Report 2020 and earlier
Randwick Depot	Decommissioning by in-situ abandonment (foam filling) of 4 x 50kL UST, replaced with 80kL aboveground tank	Previous soil contamination studies done indicate low to nil hydrocarbon contamination	Samples of monitoring wells below threshold criteria 2012	No remediation work for soil and groundwater contamination necessary around abandoned tanks - May 2016 by ADE Group	Not applicable
Waverley Bus Depot	3x 90 kL UPS tanks in-situ	Extensive soil investigations done. Suitable for	Extensive groundwater investigations done.	Groundwater monitoring program considered prior	Minimal environmental risk due to

Site name	UPSS status and remediation	Soil contamination status	Groundwater Contamination status	Contamination controls	Documented detailed controls
	abandonment in 2015	ongoing industrial land use	Suitable for ongoing industrial land use	to handover to forward liabilities	capping with hardstand

Further assessments have been conducted during the Transition Phase to evaluate the potential risk from historically contaminated fill placement on the capped hardstands to be aware of and set controls in case of future slab penetrating works. Process to control contamination are stored on Promapp

6.3. Water, stormwater, and wastewater management

Water is a key resource in NSW. The 2017 Metropolitan Water Plan sets out the way in which the NSW Government will help NSW residents to manage, conserve and sustain water resources. TJHB commits to working in alignment with the objectives of the Plan. relevant processes are available onn Promapp

We operate and maintain the installed Region 9 water infrastructure assets including:

- The Depot surface water drainage system
- Recycle and reuse water systems at Depots and maintenance facilities
- Wastewater systems at Driver's amenities and maintenance facilities, including bus wash water treatment and discharge.

The protection of stormwater drainage systems is done via penstock valves with respective procedures.

On the Region 9 network, potable water is supplied to the administration offices, Depots and maintenance facilities. Water is used for vehicle washing and cleaning.

Following the Service Commencement Date, TJHB has commenced migrating the water data into ENVIZI which collects the data automatically from invoices. Due to a transition and migration issue , that migration was delayed and therefore the audit of water usage across all depots, which will form the basis of our final water management solutions and initiatives as outlined in Table 7 is moving into Year Two. Once we have annual data for all three depots, we will use the results to identify opportunities to identify opportunities for water conversation.

6.4. Energy management

We commenced a project to visualise the energy consumption via the ENVIZI dashboard to identify opportunities to improve energy management.

We have undertaken an energy efficiency audit during year one to identify opportunities to replace lights with energy saving LED lights. Year two will see the implementation of the LED conversion.

Other potential energy-efficient measures include:

- Employee 'switch-off' campaigns
- Vehicle energy reduction projects such as the replacement of Euro 3 diesel buses with Euro 6 specified buses.

6.5.   Waste management

Transdev's EMS describes procedures to manage and dispose of hazardous and other waste from vehicles, operation areas, maintenance areas, head office, and cleaning ticketing and administrative offices. Our approach will be in accordance with TfNSW and EPA requirements – and those set out in:

- *Protection of the Environment Operations Act 1997*
- *Waste Avoidance and Resource Recovery Act 2001*
- Protection of the Environment Operations (Waste) Regulation 2014.

As a part of this process, we will adopt the EPA's waste hierarchy, illustrated in Figure 11.

Figure 11: Waste and recycling management hierarchy

Further, we will audit the compliance of our waste collection subcontractors to ensure that waste is lawfully transported and disposed at the most suitable waste and recycling facilities in accordance with the EPA Online Waste Tracking Scheme. Our waste collection subcontractors provides us with a monthly report that we will use to reconcile waste usage. Regular waste audits by the waste contractor will provide waste stream generation source data, quantities and potential waste reduction, recycling and diversion from landfill opportunities.

TJHB assess our waste generation, with a view to divert all landfill waste to waste processing facilities for recycling by 2025. This will be aligned with our Zero Waste to Landfill Strategy in collaboration with waste subcontractor, Remondis.

The procedure Manage Hazardous Waste Disposal (TJHB-02-PRO-0058) is stored on Promapp.

6.6.   Hazardous substances and dangerous goods

Operation and maintenance of the Region 9 network involves the use of a range of hazardous substances which may have potential adverse effects on the environment or our employees. The management of hazardous substances is covered in the National Code of Practice for the Storage and Handling of Dangerous Goods 2005.

The management and control of any hazardous substances used for the operation and maintenance of Region 9 will meet the requirements and controls set out in this document, and will include:

- Hazardous substances register
- Handling procedures
- Transportation
- Contaminated waste disposal and tracking
- Storage, separation and segregation
- Containment
- Signage
- SDS
- Purchasing and procurement
- Hazardous atmosphere zones
- Incident reporting

- Training
- Emergency management
- Auditing.

Hazardous materials and dangerous goods that are used, or generated by Region 9 vehicles and Depots include:

- Air conditioning gas
- Asbestos (all forms)
- Cleaning chemicals
- Clinical and related wastes (not otherwise specified)
- Contaminated soils
- Copper compounds
- Degreasing agents
- Fuel and oil
- Grease interceptor trap effluent
- Sewage
- Sludges or slurries
- Residues from industrial waste treatment or disposal operations
- Mercury and associated compounds
- Waste oils unfit for their original intended use
- Waste oil and water mixtures (or emulsions), and hydrocarbon and water mixtures (or emulsions)
- Waste substances and articles containing or contaminated with polychlorinated biphenyls (PCBs)
- Waste oil containers
- Oily rags
- Used batteries
- Paint, thinner, hardeners and other flammable chemicals
- Human waste.

The procedure Handling, Use & Storage of Hazardous Chemicals is available on Promappp.

6.6.1.   Chemwatch GOLD FFX

We use the Chemwatch platform to manage hazardous substances. Chemwatch is a web-based database system that provides easy access to SDS and running capability reports. We use the system to effectively manage hazardous and dangerous goods in the Depots. The system:

- Provides easy access to SDS
- Can be updated when an SDS is updated or about to expire
- Allows chemicals to be reviewed before purchase
- Provides access to chemical risk assessments
- Creates hazardous substances and dangerous goods compatibility reports, labels and manifests.

6.7. Noise and vibration pollution

Occupational noise pollution may result from Region 9 operation and maintenance activities. TJHB will take an approach that emphasises reducing noise levels by:

- Promoting recognition and understanding of the effects of exposure to noise
- Adopting a systematic approach to the management of exposure to excessive noise
- Monitoring noise and vibration levels in particular when complaints have been received

As required, we implement general noise control solutions and carry out engineering noise control measures on machines considering the following options:

- Eliminating or replacing the machine or its operation by a quieter operation with equal or better efficiency
- Replacing the noisy machinery by installing newer equipment designed for operating at lower noise levels.
- Ensuring cover panels and inspection hatches on machines are stiff and well damped
- Designing cooling fins to reduce the need for forced airflow and, hence, steep fan noise
  - Correcting the specific noise source by minor design changes. For example:
  - Avoiding metal-to-metal contact through use of plastic bumpers
  - Replacing noisy drives with quieter types
  - Using improved gears
- Providing a high standard of plant and equipment maintenance to facilitate compliance with the National Standard for Occupational Noise (NOHSC:1007(2000)) and reduce noise levels to as low as practicable. This may include:
  - Following the OEM's maintenance requirement to reduce noise caused by badly worn bearings and gears, poor lubrication, loose parts, slapping belts, unbalanced rotating parts and steam or air leaks
  - Booking up buses and repairing plant and equipment causing excessive noise
  - Correcting the specific machine elements causing the noise by a local source approach, rather than by consideration of the entire machine as a noise source. For example, the addition of noise barriers, noise enclosures, vibration isolation mountings, lagging to dampen vibrating surfaces, mufflers or silencers for air and gas flows, or reducing air velocity of free jets. These may be considered as a solution for the individual noise-producing elements of the total operation
  - Separating noisy elements which need not be an integral part of the basic machine. For example, move pumps, fans and air compressors that service the basic machine
  - Isolating vibrating machine parts to reduce noise from vibrating panels or guards.

Should TJHB receive noise complaints, we will investigate the complaint and action any legitimate complaint as part of our complaints management process

The Manage Noise Pollution (TJHB) procedure is kept on Promapp.

6.8.　　Key subcontractors

To effectively deliver the Contract, TJHB subcontracts some services on a back-to-back basis. For example, the waste management subcontractor that will collect, transport, process and dispose of solid, liquid and (non)hazardous waste has been specifically selected to work with us to maximise recycling opportunities and ensure the legal disposal of all waste.

Subcontractors and their personnel must comply with all reasonable directions given by TJHB in respect of work practices or use of equipment to eliminate or mitigate any condition contrary to published environmental standards.

Where appropriate, they will be required to:

- Comply with environmental sustainability requirements as per their contract with TJHB
- Comply with the requirements of all relevant environmental sustainability legislation and this Plan
- Produce a safety plan, environmental plan and/or safe work method statements before any work is started
- Comply with all TJHB environmental sustainability requirements
- Ensure that all plant, equipment, and appliances conform to statutory requirements
- Promptly investigate and report on all incidents involving their workforce to the relevant TJHB representative within the hour and take immediate action to mitigate the incident
- Be appropriately licenced by environmental and other regulators to lawfully provide services.

An overview of our procurement process is shown in Figure 12.

Figure 12: Procurement process

Procurement is a shared service provided by Transdev Australasia and Transdev Australasia identifies, assess and control environmental risks at all stages of the procurement process by:

- Developing detailed performance specifications for the goods and services to be procured, and undertaking a risk assessment to identify key risks and required controls if necessary
- Incorporating safety performance specifications, relevant standards, and codes of practice, as well as environmental obligations and reporting, in contractual documents
- Requiring subcontractors and suppliers to provide environmental plans which set out how they will meet the performance specifications
- Considering environmental performance systems and records of subcontractors and suppliers during selection processes
- Managing the performance of subcontractors and suppliers to ensure they comply with the provisions of their environmental plans – including varying the contract to adapt to changing hazard management strategies where necessary
- Monitoring, inspecting, auditing, and reporting contract safety performance to ensure goods and services continue to comply with safety requirements.

Where relevant, we will include subcontractors and suppliers in environmental consultation and communications processes. We will hold regular contract management meetings – including reviewing ongoing safety and environmental compliance, performance, and risks related to the ongoing lifecycle of the procured goods and services.

6.9. Emergency preparedness and response

The following sections provide a high-level overview of how TJHB manages environmental incidents. Emergency management and crisis response procedures are described in detail in the Emergency Management Plan as well as the Business Continuity Plan, both stored on Promapp.

6.9.1. Environmental incidents

Incidents that may have an environmental impact include:

- Involvement in a dangerous goods emergency, such as a collision with another vehicle
- Discharge of hazardous substances into the environment, such as to ground, water or into air
- Entry of a pollutant into a drainage system, watercourse or other environmentally sensitive system
- Accidental spillage including diesel fuel spillage
- A legal breach or non-compliance
- Non-compliance with the Environmental Policy or this Plan
- Receiving an environmental complaint from a third party.

On-Road incidents are recorded by the OCC into the OCC-log, TfNSW'a BIMS system and TJHB incident recording system.

Off-road incidents are recorded in the TJHB incident recording system. TJHB-02-PRO-0063 - Respond to a Reportable Incident describes the process for reporting incidents to authorities such as the EPA and also TfNSW reflecting the contractual requirements.

6.9.2. Emergency Management and Crisis Response Framework

Should an environmental incident occur, or where an environmental complaint is made and is deemed significant, we will follow the Emergency and Crisis Management Plan and the Business Continuity Plan, stored on Promapp. Depending on the actual or potential severity of the environmental incident, the EPA and/or TfNSW may be notified, see above.
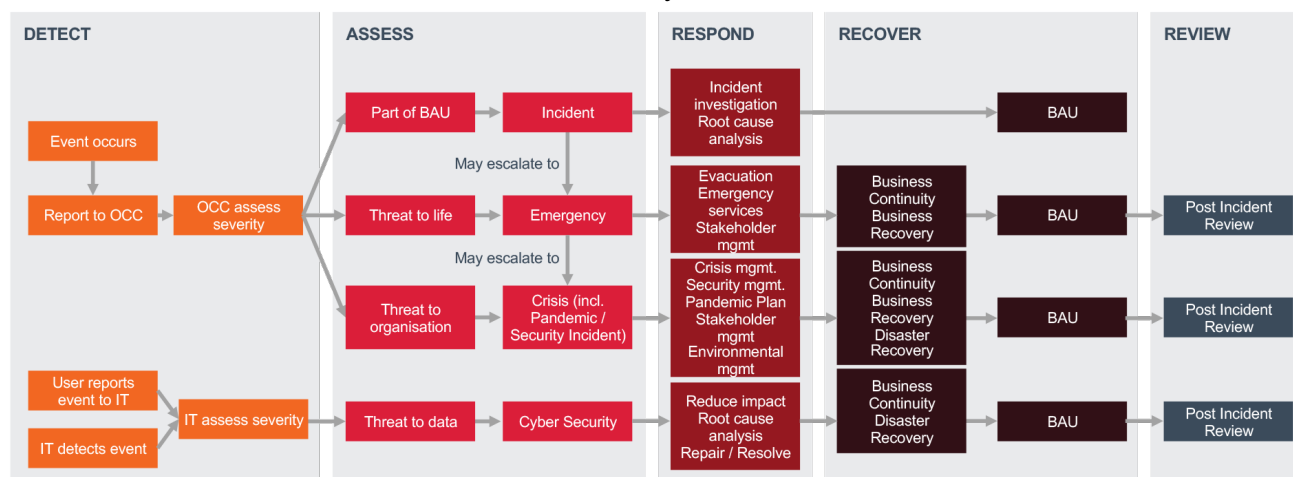

Figure 13: Emergency management response process

Emergency response includes actions such as protecting stormwater drains from contamination with firewater or hazardous liquid spillages through closure of penstock valves and spill kits, see TJHB-02-PRO-0069 - Control a Containment (Spill) for more details.

7. Performance evaluation

7.1. Key Performance Indicators

The way in which we monitor and report on our KPIs will enable a full, detailed, and transparent assessment of our performance. TJHB will report on our compliance with this Plan to TfNSW quarterly, in Quarterly Environmental Plan Reports. We will closely monitor the Contract KPIs to assess the impact of these on this Plan.

The Transdev Group target, set by the Executive Committee, requires each subsidiary business to deliver at least a 30% reduction in their carbon footprint, by 2030 – a minimum of 3% per year. Monthly reports tracking internally-set environmental targets will be compiled and submitted to the TDA Executive Team. The reports will include each of the categories included in Table 8.

Table 8: Transdev internal environmental performance KPIs

Category	KPIs
Greenhouse gas emissions	• Total tonnes of CO_2 emitted • Tonnes of CO_2 reduced through emissions management and sustainability initiatives
Air pollution	• Total kg pollutants emitted: CO, NO_x, PM, HC
Energy efficiency	• Kilowatt hours (KWh) reduced through energy efficiency activities • Gigajoule (GJ) gas used
Water consumption and efficiency	• Mega Litres (ML) of water used
Waste generation and recycling	• Tonnes of waste going to landfill • Tonnes of waste material being recycled
Fuel	• ML of fuel used
Water pollution	• Number of surface and groundwater pollution incidents

7.2. Monitoring

Monitoring key characteristics of our operations and maintenance activities is required to measure conformance with this Plan. This monitoring forms a key component of the continual improvement process. We will use the ENVIZI powered environmental dashboard on the Region 9 network and will provide TfNSW with access to the ENVIZI portal if requested.

Overall improvement in environmental performance will be measured by reviewing the progress of:

- Implementation of the objectives, targets and associated actions
- Compliance with operational control procedures (including work instructions)
- Effective implementation of environmental management procedures.

7.2.1. Environmental monitoring

Environmental monitoring involves the collection, collation and storage of all relevant environmental information, and the reporting of environmental initiatives – including the systems and methodology involved.

During Year One, we developed together with Transdev Australasia a system that transfers environmental data such as fuel consumption etc., into an online system (ENVIZI), allowing us to report and monitor. In Year Two, TJHB will continue the monitoring, and it is developing environmental targets based on year one performance together with Transdev Australasia. TJHB has trade Waste agreements with Sydney Water for all three depots in place and monitors it via the information provided by Sydney Water as well as regular monitoring of the trade waste.

In all cases, we will review and statistically analyse the results of monitoring.

Table 9 outlines the types of environmental monitoring we will undertake.

Table 9: Summary of environmental monitoring

Type of monitoring	Description
Risk	During Year One, TJHB developed an environmental risk register (aspects and impacts) which will be reviewed at least annually.
Depots	All sites continue with their monthly environmental inspections.
Incidents	Environmental incidents are recorded in CAMMSRisk and investigated in accordance with the TJHB investigation process. Results of the investigation as well as records are kept in CAMMSrisk. Customer complaints are recorded in the complaints database.
Targets and objectives	Together with Trandev Australasia, TJHB is developing reduction targets based on the year one performance.
Operational monitoring	All plant and equipment will be inspected for functionality in accordance with relevant plant and equipment inspection, maintenance and calibration schedules, manufacturer's manuals, and other relevant standards and procedures.
Compliance with legal and other requirements	TJHB has a legal register that will be reviewed on a regular basis in accordance with its document and records management requirements

Environmental issues identified by monitoring will be addressed via the Environmental Risk Register:

• Detailing environmental risks, issues or non-compliances

• Preparing and agreeing on actions to address or rectify the risk, issue or non-compliance

• Implementing and monitoring the actions to ensure effectiveness

This Plan might be modified depending on the issue or non-compliance being identified.

7.2.2. Energy monitoring

The methods of energy monitoring are described in Table 10.

Table 10: Energy monitoring method

Energy use	Unit	Source of data	Minimum collection frequency
Electricity buildings	kWh	Utility electricity meter	Quarterly
Fuel use – maintenance vehicles	kL	Fuel bills	Monthly
Renewable energy – on site	kWh, tCO2e offset	Sub-meter	Monthly
Renewable energy – main grid	kWh, tCO2e offset	Utility electricity bills	Quarterly
Office and maintenance personnel	FTE	People and Culture Team	Monthly

The following is an example top-level report/dashboard showing the energy consumption.
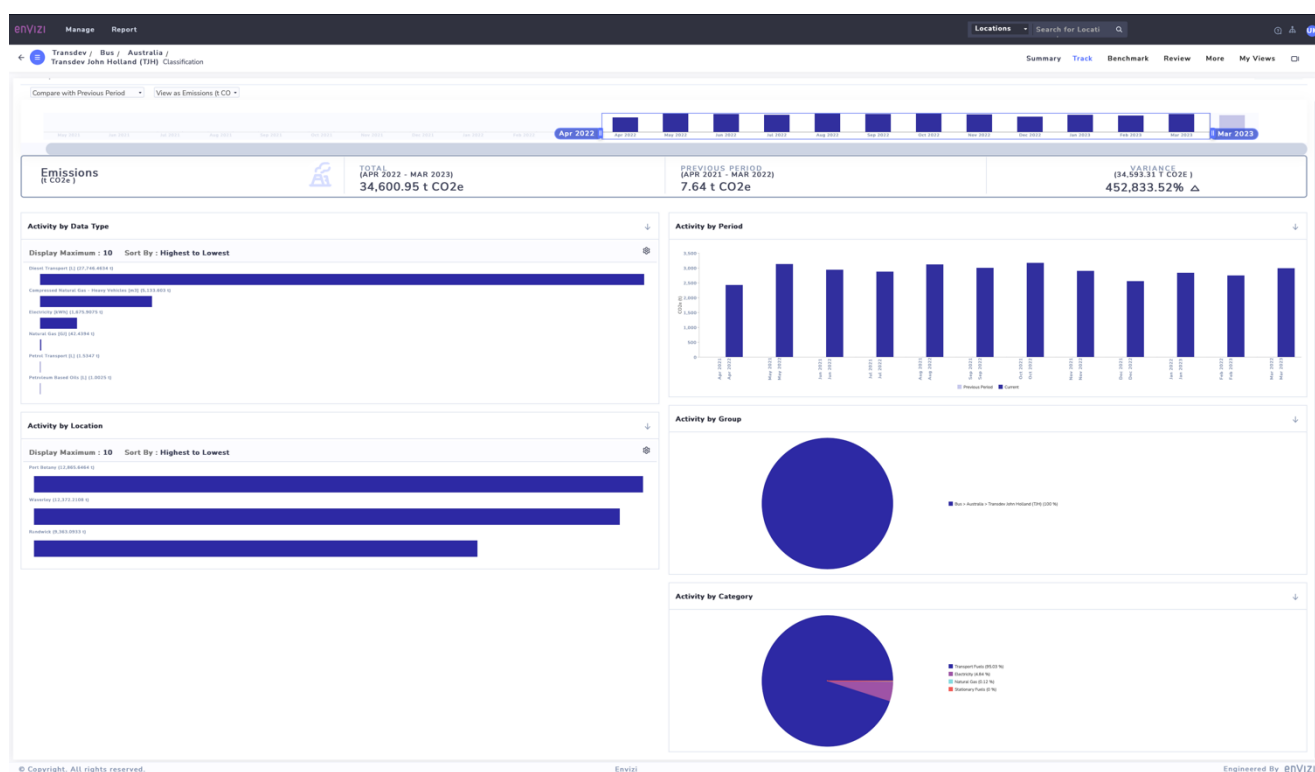
Figure 14 ENVIZI Report

Inspections and checks

7.2.3.   Preventative site and work practice inspections

The environmental controls outlined in Table 11 will be inspected on a periodic basis. A location specific inspection will also be allocated for each of the three Region 9 Depots. These assessments of environmental risk will aid managers in conducting effective site and work practice inspections.

The site work practice inspections evaluate the effectiveness of the defined engineering, administrative and behavioural risk controls. These checks are integrated with the site health and safety inspections conducted jointly by employee representatives and management. This approach will achieve a shared understanding and ownership of the issues identified and the actions required to address those issues.

The manager of the area being inspected will be responsible for developing an action plan for each finding.

Table 11: Environmental site inspections

Frequency	Location	Checklist/Form/Template	Who
Weekly	Main Yard, Fuel Bowser Bus Wash Steam Spray Waste oil and Coolant tanks Penstock and Butterfly Valves Workshop	Weekly Environmental checklist TJHB-02-FRM-0238	Leading Hand
Weekly	Maintenance Response Vehicle	Emergency Equipment Checklist TJHB-02-frm-0103 includes spill kit and absorbent material	Depot Leading Hand

Frequency	Location	Checklist/Form/Template	Who
Monthly	Workshop at depots	Plant Inspection & Repair Report TJHB-02FRM-0100 air compressors grease, coolant and oil systems Brake riveting machine and air bag press Drill press Folding machines & guillotines Hydraulic press Saws & grinders Brake caliper, hub remover, engine trolley & transmission lifter Pit jacks Pressure cleaner Forklift and chargers Lighting	Depot Leading Hand
Monthly	Water / Oil Separator Chassis Wash	Third party Pollution Control Checklist	Specialist Contractor

7.2.4.   Event-based checks

Event-based checks will be conducted by the Safety and Environmental team following significant events, including:

• Any suspected environmental incident or the receipt of an environmental complaint

• High rainfall of sufficient quantity to potentially cause flooding

• High winds of sufficient strength to cause damage to buildings, plants or equipment

• Major emergencies, e.g. collision or bushfire.

Detailed procedures relating to post-emergency/incident assessment procedures are described in our Emergency Management Plan.

7.3.   Audits

7.3.1.   External audits

TJHB's ISO 14001:2015 certification audit is scheduled for 25-26/9/23. As the TJHB EMS is part of Transdev Australasia's EMS, the September certification audit is an extension of Transdev Australasia's certification conducted by Bureau Veritas as the certification body. Surveillance audits of TJHB form part of the certification audit program by Bureau Veritas. Transdev Australasia will perform annual internal audits, with the next one planned for August 2023. ISO certification is valid for three years. Accordingly, every three years, a full detailed audit will be conducted to ensure the renewal of all certifications of Transdev Australasia, including TJHB.

The Safety and Environmental team will arrange for these external audits to occur. The scope of these audits will be predominantly decided by the external auditor.

In order to maintain Clean Fleet Accreditation, audits by an RMS certified auditor will be conducted every two years. The Clean Fleet Accreditation application has been submitted in Year One and has been accepted.

The local government agency and/or EPA may conduct announced or unannounced audits to verify that relevant legal obligations are complied with.

7.3.2. Internal audits

TJHB's Safety and Environmental Manager has developed an annual assurance program, which is endorsed by the SLT and TJHB's Board of Directors. These audits assure that we are systematically:

- Implementing and maintaining management systems and associated plans, processes, and procedures
- Demonstrating continuous improvement
- Meeting our obligations under the Contract
- Evaluating legal compliance to issued licences, relevant regulations and code of practices.

The scope and frequency of the internal audit schedule is risk-based. Audits will include:

- Desktop assessments against a defined standard or checklist
- Scheduled audits to review the robustness of the relevant management system and its level of implementation into daily work practices
- Risk-based audits to review particular aspects in response to risk indicators, or on request from the Leadership Team.

Auditors will be independent from the areas they audit and have completed internal auditor or lead auditor training in safety, quality, or environmental management systems. If technical or subject matter expertise is required, TJHB will make this available to the auditor. Audit findings may include opportunities for improvement, minor non-conformances, and/or major non-conformances.

The manager of the area being audited will be responsible for developing an action plan for each finding. This process includes:

- Taking the necessary actions to mitigate any immediate and unacceptable risk arising from a finding
- Conducting root cause analysis for all findings
- Taking corrective actions to address the root cause.

The findings and corrective actions will be entered and monitored by the TJHB database.

The Safety and Environment Manager monitors the audit findings and the ongoing status of action plan completion

Our procedure for internal auditing is stored on Promapp.

7.4. Reviews

7.4.1. Management reviews

The EMS will be subject to the established environmental governance framework for TDA entities operating in Australia and New Zealand. Management reviews will be conducted on a regular basis through the following channels:

- Leadership Team meetings, where all management system documents are reviewed and approved
- An annual management review where target achievement of the Region 9 HSEQ system and to the seven guiding principles of safe@transdev is evaluated.

7.4.2. Regular reviews

Regular review of the management systems also includes the following key elements:

- Results of internal audits and evaluations of compliance with legal requirements and with other requirements our company is obliged to
- Monitoring of performance against consent to discharge
- Review of the Environment Policy, processes, and procedures to ensure they are still consistent with, and relevant to, the overall policies and objectives of the organisation

- Review of the Environmental Impact and Aspects Register, and Legal and Other Requirements Register to ensure that they are current and relevant to new developments

- Status of preventative and corrective actions

- Actions outstanding from previous meetings

- Setting improvement action plans.

8.   Governance, reporting and continuous improvement

8.1.   Document control

The Safety and Environmental Manager updates the Environmental Plan, which will be endorsed by the Managing Director.

8.1.1.   Ongoing development and update

TJHB develops, implements, maintains, and complies with this Environmental Plan from the Service Commencement Date and for the duration of the Service Term. We will continue to improve, adapt, and amend this Plan to ensure it remains relevant and encompasses new relevant risks, changes to governing legislation, and lessons learned during its application.

In line with the Contract, the Plan will be reviewed annually, and amendments made as required to ensure ongoing compliance with the relevant legislation, regulation, and the Contract. It will be reviewed based on advice and feedback from TfNSW and TJHB employees, and in consultation with other stakeholders and agencies so that the intended environmental outcomes are achieved.

We submit updates of the Environmental Plan to TfNSW, which covers the forthcoming Contract Year, taking into consideration the need to preserve the environment and the need to mitigate any adverse effects on the environment, with a focus on ensuring all material and consumables used in the performance of Region 9 are environmentally friendly, and kept and disposed of in an environmentally safe and lawful manner.

This Plan in an abridged, easy to read version will be published on our website and made available to customers, on request, free of charge.

8.1.2.   Documentation and control of records

The EMS documentation will include:

- The Environmental Policy, objectives, and targets (see Attachment 1)

- This Plan

- A description of the scope of the EMS

- A description of the main elements of the EMS and reference to related documents, including the Environmental Plan

- Documents, including environmental records, required by ISO 14001, e.g. site plans detailing underground pipework with tanks, sewers and stormwater drainage, contaminant monitoring records, environmental training records and others

- Documents, including environmental records, determined by TJHB to be necessary to ensure the effective planning, operation and control of processes that relate to the significant environmental aspects of the Contract

- The TDA Procurement Policy

- Any environmental licence, permit or consent applicable to bus operations kept at a specific site.

EMS documentation is controlled under a specific quality process according to ISO 9001 to:

- Ensure that quality policy and quality standards and objectives are maintained

- Approve documents for adequacy prior to the issue

- Review and update as necessary and re-approve documents

- Ensure that changes and the current revision status of documents are identified

- Ensure that relevant versions of applicable documents are available and easily accessible at points of use

- Ensure that documents remain legible and readily identifiable

- Ensure that documents of external origin, necessary for the planning and operation of the EMS, are identified and their distribution controlled

- Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

8.2. Non-conformity, preventive action, and corrective action

Non-conformity, preventive and corrective actions will follow the quality procedures. Preventive and corrective actions will address the potential environmental risks and non-conformities outlined in this Plan and our environmental procedures. All non-conformities and preventive and corrective actions will be registered in the Environment Complaint and Incident Log .

TJHB views the identification of corrective action as an opportunity to continuously improve our day-to-day operations.

8.3. Continuous and long-term improvement

As a fully integrated business, TJHB applies a continuous improvement approach to contract management and performance. Integral to continuous improvement is understanding and addressing the root cause of performance issues. We establish corrective action plans in line with the Plan, Do, Measure, Improve (PDMI) cycle.

Transdev Group has developed a strong knowledge-based organisation that allows every client to benefit from our global expertise. Annually, we will share environmental performance results and initiatives with the Transdev worldwide CSR community to benchmark the Region 9 network through Transdev Group's 'Portfolio of Expertise: Environmental Solutions'. This is a catalogue promoting best practice in environmental management from around the world. We will also learn about new initiatives undertaken on other Transdev networks and consider how these may apply to the operating environment in Region 9.

The annual Transdev Group CSR Collector is an annual debrief of CSR best practice throughout the Group. We will share this with TfNSW. Every new CSR program developed at Group level and published in the CSR Collector will be available to our Region 9 operations, and the Group will support the adaptation of new programs where relevant.

New initiatives proposed by TJHB, that are of interest to the Group, will be supported and shared with the global Transdev community.

A copy of the Climate Change Policy has been provided in Attachment 2.

9. Initiatives to be delivered on Year 2

Specific Plan	Specific section (if contractually required)	Focus area	Initiative	Objective	What success looks like	Start date	End date
Environmental Management	Section 2.4.1 ISO 14001:2015 accreditation	Safety Compliance	Achieve ISO 14001 certification	Improve the impact that the business activities have on the environment	• ISO14001 certificate received	1/01/2023	30/09/2023
Environmental Management	Section 3.4 Opportunities	Contract Compliance	The integration of high voltage electrical infrastructure to support the transition towards alternative fuel bus technologies (ZEBs). Review the ZEB roll out plan in light of the grid enabling phasing of works (Phase 1, Port Botany and Randwick).	Comply to the contract (short and long term)	Physical Outcomes: • The integration of electrical infrastructure and equipment to align with the introduction of electric bus technology and vehicle replacement schedules Operational Outcomes: • To support the TDA & TJHB corporate social responsibilities and strategic environmental policies, and to support TJHB contractual requirements with TfNSW's ambitious objectives for net zero emissions by 2030.	1/01/2023	30/09/2030

Attachment 1: Environmental Policy

Environmental Policy

Purpose and Commitment

Transdev John Holland Buses (TJHB) recognizes that the operation of its business has associated environmental impacts. Responsible management of environmental issues is an essential component of Transdev John Holland Buses (TJHB) business.

TJHB is committed to ensuring that sound environmental management practices are integrated into its operations and that high but achievable environmental standards are established across Transdev John Holland Buses (TJHB) and its Subsidiaries. This policy aligns with the Group's strategic plan and demonstrates our commitment to the provision of necessary resources.

Policy

TJHB is committed to implementing an Environmental Management System that supports it strategic direction to minimise our pollution risk and environmental footprint and comply with relevant State, and Federal environmental and climate change legislation, standards, and guidelines. In particular, TJHB is committed to:

- Develop meaningful objectives and assess the impact, or potential impact on the environment of existing operations against these objectives to drive performance improvement and any changes as contemplated for areas under their control.
- Ensure that site specific environmental audits are scheduled and carried out by competent persons to drive performance improvement and progress can be monitored.
- Maintain adequate hazardous waste materials management and disposal procedure records.
- Establish and regularly review our emergency procedures which incorporate environmental risk mitigation strategies and review these procedures on a regular basis to ensure ongoing effectiveness.
- Report all accidents and incidents which pose potential harm to the environment to the relevant statutory authority.
- Undertake internal investigations of incidents where required, implement recommendations where practicable.
- Ensure that all employees and contractors receive adequate training to perform their tasks in a manner designed to comply with legislative requirements and minimise any negative impact on environment.
- Raise awareness and encourage employees and contractors to adopt a high standard of environmental responsibility in the workplace and off the job.
- Implement this Environmental Policy in consultation with employees and health and safety representatives.

Rachel Spencer
Managing Director
Transdev John Holland

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Attachment 2: Climate Change Policy

Climate Change Policy

Policy Statement

Transdev John Holland Buses (NSW) Pty Ltd (TJHB) acknowledges the scientific consensus on climate change and the wide-ranging effects that climate change will have on our clients, customers, journey makers and the communities we serve across Australia and New Zealand.

As a provider of public transport, TJHB recognises that it has an important part to play in addressing climate change, and that any actions taken in the short term will deliver economic, social and environmental benefits over the medium to long term. Recognising that we must target a reduction in our gross emissions, TJHB is also aware that by increasing the number of people using our services through mode shifting, we can collectively reduce the impact that transport has on our national emissions profile. Mode shift is therefore one of the critical steps in delivering emissions reduction.

TJHB is committed to identifying and proactively managing the risks and to realising the opportunities offered by climate change and for ensuring that TJHB is managed with climate awareness in mind.

Noting that our major shareholder has recently announced a new set of targets which are aligned to the Intergovernmental Panel on Climate Change Paris Climate Agreement (the Paris Agreement), this Policy is a demonstration of TJHB's support for the Paris Agreement and for meeting the targets that this agreement sets.

Responsibility and Accountability

The TJHB Board and the Managing Director must ensure that they are provided with appropriate information to consider the potential impact of climate change on the business, to include both the risks and opportunities.

TJHB is accountable for identifying and addressing the climate change risks and opportunities in its operations and must nominate a role to be responsible for the coordination and management of climate change risk, Green House Gas and associated reduction targets.

Compliance

This policy does not contain all associated documentation necessary for procedural compliance, and it is mandatory for all staff to familiarize themselves with relevant information provided in Promapp.

Purpose and Commitment

As a part of this Policy, TJHB has committed to delivering the following:

- TJHB will develop a set of targets and an approved "Pathway to 2030" document by the end of 2022, which will include a set of Science Based Targets to deliver the emissions reductions.
- A 30% reduction in greenhouse gas emissions from all its mobility solutions, include Scope 1, 2 and 3 emissions, by 2030

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- Zero recyclable waste to landfill by 2030, or sooner if practicable.
- To ensure transparency, TJHB will publish annual progress reports, including the results of any independent assessments of its progress towards the delivery of its 2030 targets.
- As part of our commitment to continual improvement, this policy will be regularly updated and communicated to our key stakeholders.

Rachel Spencer
Managing Director
Transdev John Holland Buses

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Attachment 3: ISO Accreditation Matrix

Clause	Standard requirements	Reference in this Plan
4	Context of the organisation	Sections 1 and 2
5	Leadership Leadership and commitment Environmental policy Organisational roles, responsibilities and authorities.	2.3 Leadership and Commitment Attachment 1 Environmental Policy TDA Procurement Policy Section 3 Roles, responsibilities, and authorities
4	Planning Actions to address risks and opportunities Environmental aspects Compliance obligations Environmental objectives.	Section 3
7	Support Resources Competence Awareness Communications.	Section 5
8	Operation Operational planning and control Emergency preparedness and response	Section 6
9	Performance evaluation Monitoring, measurement, analysis and evaluation Internal audit Management review.	Section 7
10	Improvement	Section 8