Premier Transport Group

Environmental Management Plan

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Introduction

As a leading passenger transport company in the Illawarra, Shoalhaven and Greater Sydney, we recognise that our long-term success depends on how we respond to the changing social and environmental expectations of our employees, customers, clients, regulators and the community.

Premier Transport Group is committed to delivering environmentally-friendly transport services that connect people and communities whilst balancing economic, social and environmental issues to ensure a sustainable transport system, having regard to the need to preserve the environment we all live in and mitigate any adverse effects.

Premier Transport Groups Environmental Management Plan (EMP) is to formulate measures which will mitigate adverse impacts on various environmental components, which have been identified during the environmental aspect and impact assessment, protect environmental resources where possible, enhance the value of environmental components where possible and to ensure compliance with applicable national regulations and standards. This EMP is reviewed and updated annually by the HSR team, Compliance Manager and Managing Director.

This EMP also includes a monitoring plan to enable evaluation of the success or failure of environmental management measures, and to carry out reorientation of the plan if found necessary. It is emphasised that many of the protective and enhancement measures can be implemented by adopting suitable planning and design criteria for the organisation.

The following outline is based on the general requirements of an environmental management plan consistent with the requirements under the ISO 14001 standard, OMBSC (Outer Metropolitan Bus Service Contract) and statutory obligations related to environmental protection.

Scope

This plan is applicable to Premier Transport Group employees, subcontractors and visitors on sites/depots and areas where the company provides services. Premier Transport Group sites/depots include:

- Unanderra Depot – 13-23 Investigator Drive, Unanderra, NSW, 2526
- Shellharbour Depot – 445-449 Shellharbour Road, Shellharbour, NSW, 2529
- Helensburgh Depot – 145 Walker Street, Helensburgh, NSW, 2508
- Smithfield – 239 Woodpark Road, Smithfield, NSW, 2164
- Nowra Depot – 10 Investigator Street, South Nowra, NSW, 2541
- Southport Depot – 49 Bailey Crescent, Southport, QLD, 4215
- Kiama Depot - 154 Shoalhaven Street, Kiama, NSW, 2533
- Brisbane office – Kiosk 3, Lot 60 Parklands Boulevard, Brisbane, QLD, 4000
- Toowoomba Depot – 84-88 Warwick Street. Toowoomba, QLD, 4350
- Dalby Depot – Lot 6 Commodity Court, Dalby, QLD, 4405
- Ipswich Depot – 3 Rob Roy Way, Swanbank, QLD, 4306

This EMP identifies, evaluates, controls and mitigates environmental impacts generated by Premier Transport Group to water, land, air and biodiversity.

Environmental Policy

We understand our role as a guardian of the environment, recognising the social impacts and benefits of our activities on the community, and working towards a healthier, more sustainable climate.

Our aim is to conserve resources (particularly energy and water), reduce emissions, minimise waste, and prevent pollution to protect the environment and embed all of these aspects in our climate risk considerations.

Our management commits to minimising pollution and contributing towards a sustainable future by operating our services in a manner that reaches a balance between environmental, technical, economic and social objectives.

Premier Transport Group recognises that the operation of bus services has associated environmental impacts. Responsible management of environmental issues is an essential component of Premier Transport Group.

Reducing the environmental impact of operational and maintenance activities at all Premier Transport Group locations is paramount to the business.

Our business activities use the hierarchy of control to minimise the impact of our activities on the environment.

- reduce and avoid waste generation (the most effective environmental solution may often be to avoid the generation of waste i.e., reduction);
- substitute, reuse and recycle (where further reduction is not practicable, products and materials can sometimes be used again, either for the same or a different purpose (i.e., reuse). If reusing material is not possible, then the next option is through recycling, composting or energy recovery from waste; and
- treat and dispose (disposal is only the appropriate option if none of the above offers an appropriate solution).

We are committed to operations that minimize their impact on the environment, and to developing sustainable activities across the business, through:

<u>Governance and leadership</u>

- Demonstrate sustainability leadership in the public transport industry
- Embedding environmental sustainability across our business
- Managing, minimising, and controlling environmental impacts arising as a result of our activities through the continual improvement of our Environmental Management System
- Adopting a robust and active approach to managing environmental risks
- Empowering managers and employees to deliver improved environmental sustainability performance
- Providing a framework for setting environmental objectives
- Maintaining compliance with all relevant statutory and regulatory requirements and to the EMP according to ISO 14001

<u>Environmental and Sustainability Partnership</u>

- Working with stakeholders to ensure they understand our commitment to sustainability through the provision of clear, concise and timely environmental information
- Ensuring all employees are fully briefed about the environmental implications of their role and consult with them regarding environmental improvement initiatives
- Working in partnership with stakeholders to encourage the modal shift towards public transport

<u>Preventing Pollution</u>

- Managing, minimising, and controlling pollution arising from operations and maintenance through continual improvement according to ISO14001

- Seeking alternative operational and technical solutions to reduce emission levels to air, land and water
- Reducing our carbon footprint
- Measuring and managing our carbon emissions, working towards becoming a low-carbon business
- Continuously reviewing the viability of alternate sources of energy

Protecting Biodiversity

- Working to avoid or manage potential effects on ecosystems and biodiversity arising from the operations and maintenance activities of the business
- Working with suppliers that adhere to our core values and demonstrate similar key behaviours
- Minimising consumption of natural resources and production of waste and its unnecessary disposal

Roles and Responsibilities

As part of our governance and leadership commitment, Premier Transport Group has determined roles and responsibilities in relation to environmental management across the group.

- The Managing Director is responsible for ensuring effective implementation of the Environmental Policy and promoting environmental management within the organisation
- Operations and Workshop Supervisors and Managers will contribute to the implementation of the EMP by ensuring:
    - Workplace health and safety procedures are followed
    - Workplace activities are executed as to ensure the objectives of the EMP are maintained
    - All hazards, near misses and incidents are reported, investigated and corrective action taken so as to eliminate or minimise further risk or incident
    - Reporting any major incidents to the appropriate authorities with all relevant information.
- HSR Representatives are responsible for ensuring environmental aspects and impacts are monitored and implemented based on this EMP.
- All Employees shall contribute to ensuring the objectives of the EMP are met as well as ensuring their work is in line with all company policies and procedures.

Communication

Premier Transport Group's environmental performance and initiatives are communicated to all employees through:

- Policies and Procedures documentation
- Bulletins and Updates
- Notice boards
- Employment and site Induction processes
- Toolbox Meetings
- Driver consultation and WHS Committee meetings

Employees are encouraged to provide environmental improvement suggestions via their manager or the HSR representative team.

The decision to communicate with external interested parties is retained by the company taking into account their expectations and regulatory requirements. External communication is implemented through external channels, such as website and social media.

External interested parties can provide environmental improvement suggestions through customer feedback channels, such as TfNSW systems, emails, phone or in person.

A copy of the Environmental plan is available through our website or on request through our office and is free of charge.

Environmental Aspects, Impacts, Legal and Other Requirements

Premier Transport Group has identified and evaluated environmental aspects and impacts generated by our operations to ensure compliance with applicable legal requirements. Each potential impact has been risk assessed to ensure elimination, substitution and control actions are identified and implemented. Significant aspects and impacts identified are included in the table below and aligned with the objectives and targets.

Aspect	Impact	Management Measures
Water use at bus wash/wash bay	Water pollution – consumption of natural resources, contamination of waterways from runoff water.	Minimise water usage by using waterwise hose fittings and through staff training on environmental impacts and saving water. Waste water is drained into an oil-separating pit and then pumped out and collected by a third party to dispose of appropriately.
Daily operations and housekeeping at depots	Environmental – consumption of natural resources and creation of waste	Cleaning processes within each depot, such as rubbish removal, recycling of materials and the re-use of waste (where applicable). The Premier Transport Group recycle our shredded paper to be reused as packaging materials.
Electricity consumption at depots	Environmental – consumption of natural resources	Lights around depots use timers to ensure that the lights are turned off when not required. All non-essential items within the depot are turned off when not in operational times. Our Unanderra depot has previously installed Solar Panels to increase the energy that is used from a renewable source.
Exhaust produced from fuel consumption	Air pollution – release of greenhouse gases and atmospheric pollution	Drivers are instructed to turn buses off when at a meal break or when appropriate to do so. All new vehicles that are delivered meet EURO 6 standard as a minimum. These vehicles are replacing older vehicles that only meet

		EURO 1 standards, lowering our carbon emissions from our vehicles.
Noise produced by the depot workshop and bus engines	Environmental disruption/nuisance to local residents or staff	Use of depot workshop and washbay to be used in accordance with the times as approved through the Council DA
Hazardous waste generated by workshops and depots	Hazardous waste and chemical contamination to landfill/water sources	Fuels and chemicals to be appropriately stored with sufficient bunding and handled in accordance with NSW SafeWork and Australian Standards. Following the applicable MSDS or PSDS and in accordance with the SWMS.
Fuel storage and waste generated when fueling buses and vehicles at depots	Hazardous waste and chemical contamination – spill whilst refuelling, causing ground contamination	Fuels and chemicals to be appropriately stored with sufficient bunding and handled in accordance with NSW SafeWork and Australian Standards. Following the applicable MSDS or PSDS and in accordance with the SWMS.
Fuel or oil leakage generated by on-road accidents	Storm water contamination, land contamination and potential traffic congestion to local residents and road users	Spill Kits taken on breakdowns in case of fuel or oil leakage. When necessary, assistance is sought from the relevant fire department.
Hazardous chemicals storage and use by workshop	Ground Contamination	Fuels and chemicals to be appropriately stored with sufficient bunding and handled in accordance with NSW SafeWork and Australian Standards. Following the applicable MSDS or PSDS and in accordance with the SWMS.
Solid waste generated by depots	Disposal of waste leading to land contamination	Instruct our staff to recycle as much as reasonably practical to decrease the amount of solid waste generated by depots. Specific parts associated with oil or contaminants are disposed of via accredited contractors,

		such as oil filters and used oils etc.
Emergency preparedness for natural events	Fire incidents affect the air quality, storm water pollution, land contamination and cause traffic congestion in the local area	All depots are well-maintained in an attempt to limit the occurrence of natural events in our depots. This involves ensuring all gutters are cleared, lawns are maintained, and trees are trimmed. Each site conducts a review & training for key personnel around emergency procedures and evacuation plans. This includes considerations of potential pollution risks and traffic congestion in the event of evacuation.
Vehicle, plant and equipment use by workshops at depots	Excessive exhaust emission, high fuel consumption, consumption of natural resources, ground contamination, storm water contamination	All staff are reminded of the management measures in this document to minimise our impact on the environment in operating bus services.

Monitoring and Reporting

Environmental Management Plan compliance is monitored quarterly via a meeting of the HSR team, Managing Director and compliance manager. The Compliance manager is responsible for coordinating and facilitating these meetings. Monitoring ensures all activities stated in this EMP are implemented and conform to company policy.

An environmental plan report will be provided to TfNSW in accordance with contract requirements. This report will include all relevant information obtained in the quarterly monitoring meeting above.

All environmental incidents must be reported to Transport for NSW in accordance with the Safety Incident Reporting Guidelines and in accordance with clause 32.4(c) of the OMBSC010 contract.

Environmental Incident Reporting

As soon as an employee identifies an incident that is causing or threatening material harm to the environment, they are to notify the General Manager. The General Manager will then notify the relevant authorities of the incident and pass on any relevant information relating to the incident. This includes any incident that may occur within a depot or on the road.

The notification list depends on the severity of the incident. The following contacts are commonly used when there is an environmental incident.

Incident	Notify	Phone
Any environmental incident	Depot Manager / Operations Manager	General Manager as designated in the responsibility matrix for each site.
Major spill, fire or life-threatening emergency	Emergency Services	000
Pollution incident causing or threatening material harm to the environment	NSW Environment Protection Authority (EPA Environment Line)	131 555
Waterway pollution	NSW Environment Protection Authority	131 555
Dangerous goods incident	Fire and Rescue NSW (via Emergency Services)	000
Gas leak	Gas network emergency service	1800 427 532
Electrical hazard (fallen power lines, electrical emergency)	Local electricity distributor	13 20 80 (Ausgrid), 13 20 99 (Essential Energy), 13 13 88 (Endeavour Energy)
Pollution affecting roads or traffic	Transport for NSW Traffic Management Centre	1300 725 886
Workplace injury or dangerous incident	SafeWork NSW	13 10 50
Sewer or water contamination	Local water authority	Refer to local provider
Environmental complaints from the public	Depot Manager / Environmental Manager	General Manager as designated in the responsibility matrix for each site.

Environmental Training

Premier Transport Group employees, sub-contractors, suppliers and visitors shall receive relevant environmental training to ensure they understand their responsibilities. The training is tailored to the role of the individual and is implemented through on-site induction.

Objectives and Targets

Objective	Target	Activities/Initiatives	Responsible	Timeframe
Reduce Energy consumption	Reduce electricity consumption across the business	installation of solar systems providing renewable, clean energy & installing energy-efficient LED lighting in the yard	Managing Director	Completed
Reduce Energy consumption	Maintain electricity consumption	Electricity monitoring to	Office Manager	Ongoing

		identify excessive use		
Reduce Water consumption	Reduce mains water consumption	Rainwater is captured from the roof into storage tanks to be used for regular cleaning of the buses at depots	General Manager	Ongoing
Reduce Water consumption	Reduction of mains water consumption	Monitor main water consumption and ensure backflow meters are working correctly	Office Manager	Ongoing
Healthy Waterways	Control Water pollution	Workshop uses non-toxic soaps, detergents and cleaning products	General Manager	Ongoing
Healthy Waterways	Compliance with the disposal and containment of all fluid wastes	Oil Separators installed, used and maintained in all depots	General Manager	Ongoing
Reduce Landfill	Reuse and recycle	Reuse; Retread tyres used where possible	General Manager	Ongoing
Reduce Landfill	Reuse and recycle	Recycle oil, air filters, metal, and carboard, photocopier cartridges & paper	General Manager	Ongoing
Reduce Landfill	Reuse and recycle	Donate unclaimed lost property items to charity to be repurposed or sold	Office Manager	Ongoing
Reduce Landfill	Reuse and recycle	Old mobile phones are recycled, which not only reduces landfill but also any profits go to charity	Office Manager	Ongoing
Reduce Solid Waste generation	Reduce paper and print resources	Monitor use of paper and print resources Monitor recycling to reduce paper and printing wastage	Office Manager	Ongoing
Reduce Air Pollution	Reduce pollution at the source	Driver training on energy-saving driver techniques such as gear shifting, speed	Training Manager	Ongoing

		choice, acceleration and deceleration		
On Road Accident Management	Reduce on-road accidents and incidents that may cause traffic congestion	Driver training to reduce overall road safety and cooperative traffic awareness	Training Manager	Ongoing
Reduce Air pollution	Ensure 100% of buses comply with air pollution obligations and conform to fuel consumption	Implementation of preventative maintenance to each vehicle in our fleet, which is consistent with the bus manufacturer's specifications or better, and compliant with the NSW Bus Operator Accreditation Scheme (BOAS) Compliance with Heavy Vehicle inspections by RMS	General Manager	Ongoing
Comply with noise legal requirements	Ensure 100% compliance with noise legal requirements	Monitoring of noise levels at all depots as part of the monthly safety inspection	HSR Team	Ongoing – Monthly inspections
Manage and monitor hazardous waste storage and disposal	Ensure hazardous waste storage and disposal is 100% compliant with legal requirements	Collection and disposal of used oils, rags, filters, batteries, scrap metal, tyres and used spill absorbent by licensed contractors. Workshop staff trained in correctly dispose/recycle waste Implement and maintain SDS register	Workshop Manager	Ongoing
Manage fuel tank leakage - Land pollution	Ensure 100% compliance with legal requirements for all fuel tanks and bowsers at depots	Review and monitoring of statistical inventory reconciliation analysis report from	Fleet Manager/Workshop Manager	Ongoing – Fuel entries are entered daily into the fleet system, and usage is

		the Compaq system or equivalent. Maintain the petroleum storage system, self-bunded tanks or bunding around the tank, as per the schedule in ITM Fleet system. Annual Servicing for fuel pumps in all depots.		balanced between litres in the vehicle and bowser readings.
Comply with hazardous chemicals management requirements	Ensure 100% hazardous chemicals used in workshops have Safety Data Sheets (SDS) & SWMS	Audit of respective depot chemical registers for compliance. Check SDS as part of the monthly safety inspection.	HSR Team/ Workshop Manager	Ongoing – Monthly inspections
Comply with emergency preparedness	Prepare all employees for a fire/emergency evacuation event	Ensure all buses are equipped with fully maintained fire extinguishers and staff are trained in the use of fire extinguishers. Maintenance of the fire suppression system on buses. Implementation and maintenance of firefighting equipment and obtaining Annual Fire Safety Statements. Trained Fire wardens and first aiders in all depots. Implementation and review of the evacuation plan and Emergency procedures. Implementation of electrical testing and tagging in all depots.	General Manager	Ongoing

Manage and monitor subcontractors and suppliers	Ensure vehicles purchased are 100% compliant with client requirements	Ensure Premier acquires TfNSW-selected model buses only. Implementation and monitoring of the Bus Operator Accreditation Scheme (BOAS). Implementation and monitoring of on-site quality inspection during bus manufacture and feedback given to bus manufacturer for continual development.	Compliance Manager	Ongoing
Correct disposal of vehicles and parts	Ensure 100% of company buses are disposed of according to legal requirements	Vehicles are sold or transferred to other bus companies or individuals and bus parts are recycled where possible. Recycling of disposed vehicles or scrap when not saleable. These are sold to scrap yards that are registered with the EPA, and receipts are provided and maintained. Re-use of old vehicles for non-route service or training purpose. Implementation of regular maintenance and repair to ensure vehicles achieve their life expectancy.	Workshop Manager	Ongoing
Monitor Sub-contractor compliance	Ensure 100% of subcontractors and suppliers are	Evaluation of subcontractors and suppliers as identified by	Compliance Manager	Ongoing

	monitored and evaluated	business unit and company requirements. Monitoring and auditing of Sub-contractors and suppliers.		
Plant and Equipment compliance	Ensure Plant and equipment at workshops are 100% compliant with legal requirements	Maintain registration of Plant and equipment. Implement and maintain plant and equipment risk assessments Maintain calibration and/or service of Plant and Equipment.	Fleet Manager	Ongoing
Incorporate stakeholders environmental needs and values into our decisions and regulatory submissions	Engage with stakeholders to understand what they need and value, including environmental considerations, from across our services.	Develop, implement and maintain stakeholder engagement as per the Stakeholder Community Engagement plan. Engage with the government to move towards zero-emission buses in the future.	Compliance Manager	Ongoing

Commitment and Reporting

As part of this plan, Premier Transport Group is committed to the following:

- Review of this environmental management plan to be undertaken:
    - Following significant environmental incidents
    - When there is a need to improve performance in an area of environmental impact
    - Annually as part of the business planning process
- Submit a copy of each update to the environmental management plan to TfNSW as per contract requirements.
- Report quarterly against contracted commitments in Quarterly Environmental Plan Reports in accordance with the TfNSW contract.

Supporting documentation

- Customer Experience Plan
- Accessible Transport Plan
- Disability Engagement Plan

- Diversity Inclusion Plan
- Safety Management System (SMS)
- Sustainability Plan
- Waste Management Procedure

Applicable Key Legislation

- NSW Protection of the Environment Operations (POEO) Act 1997
- NSW POEO Regulation 2022
- NSW POEO (Waste) Regulation 2014
- NSW POEO (Clean Air) Regulation 2022
- NSW Environment Planning and Assessment Act 1979
- NSW Contaminated Land Management Act 1997
- QLD Environmental Protection Act 1994