



MOORSIDE

HAVE YOUR SAY

Draft Outline Construction Environment Management Plan



The Moorside Project
Stage Two

MAY 2016



This document presents a draft Outline Construction Environment Management Plan. The full details of the environmental information which has been gathered by NuGen to date is in the Preliminary Environmental Information Report (PEIR) which can be found on the www.nugenconsultation.com website or via a USB card that can be picked up at one of the consultation events from 14th May to the 30th July 2016. Consultation event dates and location of hard copies of the PEIR can be found on www.nugenconsultation.com.

This document can be read in conjunction with the other Stage Two Consultation Documents, including the Proposed Scheme Consultation document which describes the legacy and benefits of the Moorside Project in more detail.

A full Environmental Statement will be submitted as part of NuGen's Planning Act 2008 application for development consent for the Moorside Project in 2017.

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1. Introduction

1.1 Purpose of this report

Overview of project

- 1.1.1 NuGeneration Ltd ('NuGen') proposes to make an application for an order granting development consent (hereafter referred to as a 'DCO') under the Planning Act 2008 for the construction, operation and maintenance of a nuclear power station (the "Moorside Power Station"), together with railway works between Corkickle and Mirehouse, St Bees and at the Moorside Site (the "Moorside Project Railway"), amongst other development (which includes a Marine Off-Loading Facility at the Moorside Site, highway improvements and worker accommodation). We are calling this the "Moorside Project".
- 1.1.2 The Moorside Power Station is planned to be located to the west and north of the existing Sellafield Site in Cumbria (the "Moorside Site").

1.2 Applicant

- 1.2.1 NuGen is a joint venture developed between Toshiba and ENGIE (formerly GDF SUEZ).
- 1.2.2 NuGen, supported by its parents companies, is currently working on detailed plans for developing the Moorside Site. The company has unrivalled experience in global, large-scale nuclear and construction projects. NuGen combines the strengths of its two parent companies - established financial robustness and proven operating experience - with world-leading technology provided by Westinghouse Electric Company, a group company of Toshiba.

1.3 Draft Outline Construction Environmental Management Plan (CEMP)

- 1.3.1 A Construction Environmental Management Plan (CEMP) is needed to ensure that the environmental effects of construction works associated with the Moorside Project are controlled and mitigated. As part of its application for development consent for the Moorside Project in 2017, NuGen will submit a number of CEMPs.
- A detailed Final CEMP to cover initial parts of the construction period on the Moorside Site will be written. The scope of the phases of construction to be covered by the Final CEMP is still to be finalised.
 - In addition, an Outline CEMP will also be submitted to cover the rest of the construction works for the Moorside Site, Accommodation Sites and Additional Sites.

- 1.3.2 All will follow the same structure and approach and are collectively referred to as “the CEMP” for the remainder of this document.
- 1.3.3 The CEMP will take account of appropriate environmental mitigation commitments identified in the Environmental Statement (ES).
- 1.3.4 The CEMP will be secured in a requirement in the draft DCO. When a DCO is made, then prior to certain works taking place, a final version of the CEMP will need to be produced and submitted for approval to the bodies listed in the requirement. NuGen and its contractors will then be required to comply with the final and approved CEMP in undertaking the relevant construction works. The CEMP will be a live document throughout the construction phase.
- 1.3.5 This document sets out the proposed structure of the CEMP and is intended to provide clarity on the proposed contents and structure of the document which will be submitted as part of NuGen's application for a DCO for the Moorside Project in 2017.
- 1.3.6 There will be a number of strategies and management plans that are also submitted by NuGen as part of its application for a DCO for the Moorside Project. These may need to be read alongside and interact with the CEMP.

1.4 Outline Construction Environmental Management Plan requirements

- 1.4.1 It is intended that the first section of the CEMP will set out the requirements of the document. Such a section of the CEMP is intended to provide the contractor and client with a useful and essential project specific tool to manage on-site construction activities that may impact on the environment. The key objectives of the CEMP are anticipated to be to:
- Translate the requirements of the DCO other legal obligations, relevant standards and guidance and company requirements into a management plan;
 - Ensure all environmental commitments are met and fulfil requirements of relevant statutory legislation, standards and guidance;
 - Ensure that disturbance to the physical environment from all construction activities is avoided, or where this is not possible that disturbances are minimised and appropriately mitigated;
 - Ensure that impacts on transport, tourism, historic sites and cultural heritage are avoided, or where this is not possible that impacts are minimised and appropriately mitigated;
 - Ensure that agreed appropriate site restoration is achieved on completion of the construction of all development associated with the Moorside Project; and
 - Ensure effective engagement with key stakeholders is undertaken as appropriate, in the delivery of the required mitigation.

1.5 Structure of the remainder of the CEMP

1.5.1 The rest of the CEMP is proposed to be structured as follows (following on from **Chapter 1** which is as outlined above):

- **Chapter 2:** Environmental policies, responsibilities and emergency procedures;
- **Chapter 3:** Project specific environmental objectives and targets;
- **Chapter 4:** General operational controls;
- **Chapter 5:** Construction environmental management;
- **Chapter 6:** Records management;
- **Chapter 7:** Training, awareness & competence;
- **Chapter 8:** Register for environmental nuisance complaints; and
- **Chapter 9:** Project completion requirements.

2. Environmental policies, responsibilities and emergency procedures

2.1 Relevant legislation and guidance

- 2.1.1 A legal compliance register will be prepared as part of NuGen's Information Management System (IMS) development which will detail all relevant legislation and guidance that NuGen and all subcontractors must comply with.
- 2.1.2 The CEMP will note that all site staff will be kept informed of the above legal requirements and made aware that if these are not met that they could be breaking the law.
- 2.1.3 Any supporting documents which may be appended to the CEMP will take account of relevant legislation and guidance, including the legislation referenced above.

2.2 NuGen's corporate policies

- 2.2.1 NuGen has an Environmental and Sustainability policy; this policy is signed by the CEO and is reviewed and updated on an annual basis. It outlines the company's commitment to environmental management and is communicated to all employees annually and available publically on our website.
- 2.2.2 NuGen contractors must have a suitable environmental policy statement, developed and signed by top management, relative to the scope of the organisation's Environmental Management System (EMS) and conforming to BS EN ISO 14001.
- 2.2.3 The policy must include commitments such as compliance with legal and other requirements, prevention of pollution, and continual improvement. The policy should also provide a framework for reviewing objectives and targets and be appropriate to the nature, scale and environmental impacts of the organisations works on the Moorside project.
- 2.2.4 All contractors must also be able to demonstrate that the policy has been communicated to all employees and stakeholders involved with the Moorside project and is available to the public.
- 2.2.5 As such, the above will be referenced and incorporated within the CEMP that is submitted in 2017.

2.3 EMS requirements

- 2.3.1 In order to satisfy the requirements of BS EN ISO 14001 and support the organisation's strategic agenda, NuGen is developing an Integrated Management System (IMS), which will combine the standard environmental, health and safety and quality management systems into a single framework.

This approach will ensure continual improvement is at the heart of everything that NuGen does and will provide the framework of its mission, vision and values, company policies, management responsibilities and processes and procedures. It will set out how NuGen will be a successful world-class nuclear company.

- 2.3.2 All Contractors must be able to clearly demonstrate their documented approach to environmental management and have an EMS or IMS that is compliant with BS EN ISO 14001, although the company may not necessarily have certification in place.
- 2.3.3 As such, the above will be referenced and incorporated within the CEMP that is submitted in 2017.

2.4 Environmental Statement

- 2.4.1 An Environmental Statement (ES) is being prepared, describing and assessing the likely significant environmental effects of the construction, operation and decommissioning of the Moorside Project. The ES will be submitted as part of the suite of DCO application documents in 2017 and the CEMP will align with the commitments made in the ES regarding various proposed mitigation measures.

2.5 Roles and responsibilities

Securing implementation of the final CEMP

- 2.5.1 The CEMP will make clear that overall responsibility for implementation of the final CEMP will lie with NuGen, thus ensuring that all relevant environmental commitments and responsibilities are adhered to. NuGen will also hold overall responsibility for auditing the implementation of environmental mitigation measures on site and ensuring an audit plan is developed prior to construction commencing.
- 2.5.2 The final CEMP, together with adherence to key legislation and good practice guidance, represent the minimum environmental requirements and standards which all personnel must comply with when working on behalf of NuGen on the construction of the Moorside Project. The final CEMP will fully accord with relevant legislative requirements.
- 2.5.3 All contractors involved in the construction works for the Moorside Project will be responsible for complying with the requirements of the final CEMP during construction works.

2.6 Community relations

- 2.6.1 To ensure that all construction works are completed with the minimum of disruption to communities, the CEMP is expected to outline that NuGen and relevant contractors should liaise with the relevant local authority/ies and

other relevant parties to identify when community events and other potential conflicts (see below) are planned within areas close to the Moorside Project Sites. This is to enable NuGen to endeavour to account for such events in the development and implementation of a detailed construction programme. Such community events and conflicts may include:

- Local events (such as entertainment, sporting, fundraising and local community events);
- Tourism events and peak times (e.g. summer holidays);
- Other road works and closures related to developments other than the Moorside Project;
- Other commercial road users planning increases in traffic (e.g. quarries or other construction projects); and
- Other utility networks operations.

2.7 Procedures

Inspection procedures on site

- 2.7.1 The CEMP is expected to detail that environmental inspections of the Moorside Project would be carried out on a regular basis. Such inspections would vary according to the individual receptor. These inspections would consider the environmental impacts of all construction works. Suitably qualified environmental Clerks of Works would be appointed to supervise and inspect works as necessary. Such audits would be undertaken in order to ensure compliance with the final CEMP and all other legal requirements.
- 2.7.2 Visual Environmental Inspections would be carried out regularly by Contractors and/or the appointed personnel onsite.

Incident and emergency procedures

- 2.7.3 The CEMP is proposed to make clear that all environmental incidents must be reported to NuGen's Site Manager and HSSE Manager who would decide whether the incident is reportable to the Environment Agency (EA) or other Regulators.
- 2.7.4 The EA should be contacted by a relevant member of staff where an incident results in direct pollution of a watercourse. This should allow for inspecting the incident, taking immediate actions to control/mitigate impacts and enable the EA to inform third parties and to take further mitigation steps if required.
- 2.7.5 All emergency response arrangements would be included in the construction site induction and communicated to the relevant regulatory bodies if required.

Other environmental incidents

- 2.7.6 The CEMP is proposed to specify that if there is any other type of environmental incident, staff would be instructed to stop their activities and report it to the appropriate supervisor. These may include:
- Discovery of suspected contaminated land;
 - Discovery of protected animals, birds or reptiles;
 - Damage to trees and hedgerows;
 - Discovery of archaeological or historic remains; and
 - Near misses - where events could have led to a minor or major incident.
- 2.7.7 Nugen's HSSE Manager/Environmental Manager should be notified immediately.
- 2.7.8 The CEMP will provide details about the classification of incidents and how each incident may require report and investigation.
- 2.7.9 A separate section on dealing with complaints from third parties regarding noise, dust, light pollution etc will be provided in the CEMP. The CEMP would also ensure that procedures for investigating and reporting back to those who made the complaint were in place.

Audits

- 2.7.10 Finally, the CEMP would set out that a planned programme of compliance audits would verify the integrity and effectiveness of the environmental management system used throughout the Moorside Project and may include site visits. The purpose of any visit would include:
- Ensuring that the final CEMP and all other environmental commitments are being adhered to and that the relevant documentation is being completed;
 - Ensuring that progress towards environmental objectives and targets is being monitored; and
 - Ensuring that legislation and all other requirements are being complied with.
- 2.7.11 The audit report would make recommendations for improvement and identify the appropriate personnel and timescales for completing these actions. The contents of the report would, if necessary, be discussed at site HSSE meetings.
- 2.7.12 Following the audit, if deemed necessary an investigation would be instigated and corrective actions taken. The effectiveness of any resultant actions carried out would be assessed by the project at an appropriate time scale.

3. Project specific environmental objectives and targets

- 3.1.1 NuGen requires that its contractors and their sub-contractors support NuGen's established Environmental Objectives & Targets for the Moorside Project which are detailed below.
- 3.1.2 In doing so it is expected that contractors and their sub-contractors may align their own existing Environmental Objectives and Targets or develop new ones to show how they will support the NuGen Environmental Objectives & Targets.
- 3.1.3 The CEMP is therefore proposed to secure this and to detail the relevant Objectives and Targets.
- 3.1.4 The Moorside Project's overall Environmental Objectives are expected to be to:
- Protect and enhance the local habitats being worked in, avoiding adverse impacts on the existing ecology, biodiversity and air, water and land quality;
 - Promote sustainable use of natural resources, minimising emissions and waste where practicable;
 - Protect and enhance the local landscape and in particular the historic environment, avoiding impacts on existing features; and
 - Minimise the disruption to the local community both during construction and operation.
- 3.1.5 The Moorside Project's overall Environmental Targets are expected to be:
- Zero Category 1 or 2 Environmental Pollution Incidents, Enforcement Notices or Regulatory Actions;
 - Minimum of waste created; zero inert construction waste to landfill and 95% of all wastes re-used for recycled; and
 - 25% increase in biodiversity in targeted areas under NuGen's control or influence by the end of the Construction and Commissioning phase.
- 3.1.6 NuGen will set and review annual objectives and targets to support the overall Moorside Project Objectives and Targets.
- 3.1.7 NuGen will establish a programme of Environmental Key Performance Indicators (KPI's) that it will use to measure its environmental performance (reactive and proactive metrics); these will also be found in an Appendix in the Outline and final CEMP. It is expected that all contractors will contribute towards these by supporting their measurement and reporting.

4. General operational controls

4.1 Site operations

4.1.1 This section of the CEMP will include details on the management arrangements for:-

- H&S;
- Hours of working;
- Site facilities/welfare;
- Fencing/security; and
- Lighting.

4.2 Emergency preparedness

4.2.1 It is essential that NuGen and the EPC Contractor personnel know what to do in an environmental incident. NuGen has developed an approach to overall Emergency Preparedness including responding to an environmental incident and it expects its Contractors to comply with these overarching requirements. As such, the CEMP is proposed to include a section that deals with this issue and covers the below points.

4.2.2 NuGen considers the following potential environmental hazards/impacts need to be considered, as a minimum, during the construction phase of works:

- Noise impact;
- Air Quality impact;
- Impacts on public highways;
- Unplanned release of contaminants (e.g. chemicals, cement, concrete and bentonite, diesel and other fuel oils) to land, watercourse or sea;
- Allowing silt to enter watercourses;
- Poor storage of chemicals, waste, diesel or fuel oils;
- Watercourse disturbance; and
- Habitat or other ecological damage.

4.2.3 A site layout drawing will be maintained which identifies possible hazards, pathways and sensitive receptors.

4.2.4 All NuGen personnel will be trained in the appropriate environmental emergency arrangements for their activities and regular exercises will be undertaken to demonstrate familiarity with the arrangements. This will include ensuring appropriate emergency equipment is available and readily deployable (e.g. spill kits).

- 4.2.5 NuGen requires all Contractors to nominate a named individual to have responsibility for environmental emergency preparedness, including liaison with NuGen.
- 4.2.6 All contractors are required to establish, implement and maintain suitable arrangements to identify potential situations arising from their activities on Site; both planned and unplanned that may have a possible negative impact on the environment. These situations should be assessed and measures for responding to them clearly detailed. These arrangements must be in compliance with NuGen requirements and be appropriately documented in the Outline and final CEMP or other suitable document to be approved by NuGen.
- 4.2.7 The purpose of these arrangements is to define the roles, responsibilities, actions, communication and reporting requirements for responding to any incidents in order to protect personnel, the public and environment from any environmental incident caused as a direct result of site activities.
- 4.2.8 This document must also outline how Contractor personnel will be trained in the requirements of these arrangements and document the methods by which the plan will be tested and reviewed and at what frequency.
- 4.2.9 NuGen will require the contractors Environmental Emergency Preparedness arrangements to include details on:
- Stop - how to stop pollution that is occurring in the first instance;
 - Contain - how to contain the pollution at source and prevent further spread;
 - Notify - who and how will the Contractor inform of the incident; All environmental incidents or near misses that occur on the Moorside Project must be reported immediately and an investigation report instigated in accordance with NuGen's requirements;
 - Decide - in consultation with NuGen, the significance of incident; and
 - Clean up - how to deal with any pollution clean-up requirements including appropriate disposal of any resulting waste.
- 4.2.10 In developing their Environmental Emergency Preparedness arrangements and plans contractors should give consideration to the following:
- The nature of onsite hazards, e.g. flammable liquids, storage tanks, chemicals and compressed gases, and measures to be taken in the event of spillages or accidental releases;
 - The most likely type and scale of any environmental incident in relation to their scope of works;
 - The most appropriate method(s) for responding to an environmental incident;
 - The action(s) required to minimise environmental damage including hazard specific mitigation measures;

- Internal and external communication plans;
- Incident or near miss reporting;
- Methodology for periodic testing and review of environmental incident response arrangements;
- Training of environmental incident response personnel; and
- List of key personnel, emergency services, contacts and waste disposal companies.

4.2.11 To ensure these emergency preparedness arrangements are suitable and sufficient, all contractors would be expected to maintain an up to date inventory of all substances stored on site (under their management and control) which may have the potential to cause pollution including storage location and arrangements.

4.3 Site refuelling & details of refuelling duty holders

4.3.1 A site refuelling method statement will be prepared in order to control refuelling at all of the construction sites. Details will also be provided of the refuelling duty holders.

4.4 Oil & fuel storage

4.4.1 The CEMP will set out guidance in respect of the safe use and storage of oil and fuels.

4.4.2 It will cover the location of any fuel storage during the construction phase and the procedures set out to manage refuelling.

4.5 Fire

4.5.1 A Fire Strategy will be produced by NuGen and the EPC contractor and this will be detailed in the CEMP.

4.5.2 The CEMP will explain that emergency procedures will be established for use in case of fire & briefed to staff as part of induction. Firefighting equipment will be located at signed stations near to laydown areas (paired with spill stations & clearly signposted).

4.5.3 Staff will be briefed on fire risk from cigarettes; gas burners etc. whilst working in dry conditions, particularly in habitats such as long grass which could easily be set alight by such actions. In dry weather smoking and other sources of ignition will be restricted and in any case smoking would only be allowed in designated smoking areas. Under no circumstances will open fires be lit on any part of the construction laydown areas for construction works.

4.5.4 There will be a section on fire risk assessment for Hot Work as part of construction.

4.6 Community safety

- 4.6.1 The CEMP will include measures for the safety of local communities during the construction works and this will be detailed in the CEMP.

4.7 Site waste management

- 4.7.1 The CEMP will explain measures for the management of waste produced during the construction works.

5. Construction environmental management

5.1.1 This section provides a list of the subject areas which will be covered in the CEMP, to accompany the DCO application in 2017, with respect of construction environmental management. This will include the development of a range of draft management plans describing environmental management measures to be implemented during the construction of the Sites that make up the Moorside Project:

- Soils, Geology and Land Quality;
- Noise and Vibration;
- Air Quality;
- Transport;
- Marine Ecology;
- Terrestrial and Freshwater Ecology;
- Ornithology;
- Freshwater Environment: Groundwater and Surface Water;
- Historic Environment;
- Landscape; and
- Countryside Access and Recreation.

6. Records management

- 6.1.1 It is proposed that the CEMP will explain that document control procedures would ensure that all correspondence, drawings and technical data received are recorded, distributed, filed and archived in an efficient and controlled manner.
- 6.1.2 Documents and records required by NuGen and their Contractors to support their environmental related activities and the EMS should be controlled through establishing, implementing and maintaining a process that:
- Approves documents for adequacy prior to issue to ensure that requirements are clearly stated and they are authorised for issue;
 - Reviews and updates as necessary and re-approve documents and drawings;
 - Ensures that changes and the current revision status of documents are identified;
 - Ensures that relevant versions of applicable documents are available at points of use;
 - Ensures that documents remain legible and readily identifiable;
 - Ensures that documents of external origin determined by the organisation to be necessary for the planning and operation of the EMS are identified and their distribution controlled; and
 - Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.
- 6.1.3 Standard methods should be defined for adding and identifying revisions. Where practicable the nature of any change should be identified within the document or the appropriate attachments. All documents should be re-issued after a number of changes have been made.
- 6.1.4 Through all stages of the Project, Contractors should establish and implement a system to create, maintain and manage comprehensive, accurate and reliable records covering all the environmental aspects of the work being undertaken on the Moorside project, including but not limited to any environmental emissions, wastes, sampling/analysis and incidents/events. This system and the records within it must should regulatory standards as well as industry best practice.
- 6.1.5 The Contractors record management system should also ensure the preservation of the records including retention, archiving and eventual destruction. Contractors should ensure that appropriate records are retained for the period of time stipulated in their contractor Environmental Protection Plan and which meets the applicable environmental regulatory requirements.

7. Training, awareness & competence

7.1 Introduction

One of NuGen's primary objectives is to ensure all personnel working on the Moorside Project are suitably qualified and experienced to carry out assigned tasks with minimum environmental impact. NuGen expect that Contractors will have established a competency management system (CMS) covering environmental aspects of the work being undertaken. As such, the CEMP is proposed to cover the below points.

7.2 Competency

- 7.2.1 In addition to any specific regulatory requirements Competence, Training and Awareness, requires NuGen to ensure that person(s) performing tasks for it or on its behalf that have potential to cause a significant environmental impact(s) identified by NuGen is (are) competent on the basis of appropriate education, training or experience, and shall retain associated records.
- 7.2.2 NuGen and Contractors should be technically competent to undertake specified tasks and be capable of demonstrating competence on an on-going basis. They should know how to operate equipment; how to comply with law and government policies and to minimise risk and impact on people and the environment.
- 7.2.3 Certain regulatory requirements specify that NuGen and its Contractors must identify and appoint Competent Persons for certain specified environmental activities and impacts.

7.3 Competence management

- 7.3.1 NuGen requires Contractors to have written processes and procedures to demonstrate individuals are Suitably Qualified and Experienced Persons (SQEP) and competent, including:
- Specific requirements for identification and deliverance of competence, encompassing job analysis, identification of competence requirements, training needs analysis, training programme design and implementation, formal assessment of competence, and evaluation; and
 - Interim arrangements where a competency gap is identified, where appropriate supervision and monitoring should be maintained until individuals are demonstrably competent to perform their tasks.

7.4 Training

- 7.4.1 NuGen and the EPC Contractor are responsible for ensuring all personnel engaged on the Moorside Project receive suitable training on all environmental

matters associated with the Moorside Project. Both should identify and develop programmes that ensure appropriate environmental training integrates environmental protection into all activities and decisions.

- 7.4.2 NuGen and the EPC Contractor will establish, implement and maintain a method to ensure persons working for it or on its behalf aware of:
- Significant environmental sensitive areas on the Moorside Project Sites and how and why they should be protected;
 - The importance of conformity with the environmental policy and procedures and the requirements of the Environmental Protection Plan;
 - The significant environmental aspects and the potential impacts associated with their work, and the environmental benefit of personal performance;
 - Their roles and responsibilities in achieving conformity with the requirements of the environmental management system; and
 - The potential consequences of departure from specified procedures.
- 7.4.3 The EPC Contractor will be responsible for identifying and providing training needs associated with its environmental aspects, its environmental management system(s) and the final CEMP.
- 7.4.4 Training (including refresher training) will be documented inclusive of a demonstration of competence where appropriate. The following key areas should be covered in environmental training packages delivered by competent persons:
- Key Project Environmental Issues;
 - Approach to Sustainability;
 - Environmental Planning;
 - Records Management;
 - Communications;
 - Emergency Preparedness;
 - Environmental Incident Management, Investigation & Reporting;
 - Environmental Objectives & Targets;
 - Environmental Reporting;
 - Waste Management;
 - Handling, Storage and Spill Response;
 - Dust, Odour, Noise and other Nuisances;
 - Regulatory Requirements including Planning Constraints;
 - Ecology;
 - Carbon Management;

- Traffic management; and
- Biodiversity & Environmental Enhancement.

7.4.5 NuGen and Contractors will use site experience of incidents and events to ensure Learning from Experience (LfE) as part of environmental training and awareness.

7.5 Awareness

7.5.1 Environmental awareness for both NuGen and the EPC Contractor will be achieved by:

- Site Induction including relevant environmental issues;
- Environmental posters and notices;
- Task specific Risk Assessments/Method statement (RAMS) including environmental protection, mitigation measures, emergency preparedness and incident management arrangements;
- Toolbox Talks;
- Lessons Learnt Briefings;
- Incident Response procedures; and
- Key project specific environmental issues briefing.

7.6 Communications

7.6.1 A positive culture will be fostered within NuGen and the EPC Contractor, characterised by open communications built upon mutual trust and by shared values that recognise the importance of excellent environmental performance on the Moorside Project.

7.6.2 From time to time Environmental Circulars may be distributed by the Environmental Sustainability Manager as required to key staff including Site management and Contractors to keep them informed of environmental issues such as learning events from incidents/accidents or new legislation. Similarly poster campaigns may be launched from time to time to raise awareness and keep staff informed of environmental issues within the organisation.

7.6.3 All staff are encouraged to make suggestions for environmental improvement and report environmental problems; this can be either done in person, via e-mail or via the Environmental Suggestions card.

7.6.4 All Contractors are accountable for implementing suitable arrangements for receiving, documenting and responding to communications with NuGen and other interested parties involved on the Moorside Project. These arrangements may include a dialogue and consideration of their relevant concerns about environmental aspects and impacts associated with their project activities and

also address necessary communication with public authorities where appropriate.

7.6.5 Communicating openly and honestly with all stakeholders throughout the project at all levels will promote safe operations and a high standard of environmental protection.

7.6.6 Contractors shall ensure appropriate environmental communication by:

- Being open and honest in their interaction with NuGen and others;
- Developing and communicating their vision through a suitable Environmental Plan that relates to their scope of work and details their approach to environmental performance and continuous improvement;
- Monitoring performance against the final CEMP and their specified environmental objectives and targets;
- Ensuring environmental issues arising from site environmental reports, corrective action notices or audits are discussed at site safety meetings and actions apportioned accordingly;
- Developing and reviewing a Communications Plan that covers environmental issues either as part of the Environmental Plan or within some other appropriate document;
- Establishing and utilising appropriate methods to share environmental related information;
- Ensuring that interfaces with other organisations are clearly defined and understood while reinforcing that environmental protection remains the highest priority;
- Routinely communicating with key stakeholders including personnel within the project, the public (in accordance with NuGen's Communication Strategy) and other stakeholders affected by project activities;
- Supporting visits from regulators and oversight organisations;
- Ensuring effective communication of changes or significant decisions that affect employees and stakeholders;
- Ensuring effective training and coaching on communication skills;
- Enabling personnel to honestly and openly discuss concerns and issues, recognise this as one of the most effective approaches against environmental events; and
- Encouraging timely and effective communication of all environmental critical information.

8. Register for environmental nuisance complaints

- 8.1.1 Should any environmental complaints be received during the construction works then they would be detailed, along with a description of any actions taken. An example of the type of complaints register that would be used will be included in the CEMP.

9. Project completion requirements

- 9.1.1 Any post construction requirements (for example re-instatement works) will be confirmed in due course with NuGen and agreed with Local Council/landowner/statutory bodies as appropriate. An example of the sort of project completion register that would be used will be included in the CEMP.
- 9.1.2 An audit would be undertaken to ensure that any project completion requirements have been satisfactorily completed and this would be similarly documented. An example of the sort of register that would be used will be included in the CEMP.