

ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

EMS OVERVIEW

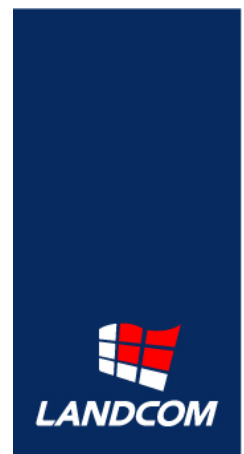


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1. ABOUT LANDCOM

On 1 January 2002, Landcom was established as a state-owned corporation, constituted under the Landcom Corporation Act 2001. Landcom's role is to facilitate strategic and complex urban development projects for the NSW Government; demonstrate high quality urban design; and lead by example in social, environmental and economic sustainability.

Landcom facilitates the delivery of a variety of greenfield and renewal projects. While the Corporation's focus is on the residential sector, it is not limited to this market and its activities include commercial and industrial projects.

Overall control of the Corporation is exercised by Landcom's Portfolio Minister (Hon. Kristina Keneally MP), in conjunction with two Shareholder Ministers (Hon. Eric Roozendaal MLC and Hon. Joseph Tripodi MP). A Board of Directors, consisting of industry leaders and government experts, oversees Landcom's day-to-day operations.

Landcom maintains a tight business structure, employing approximately 140 staff (2008) in its four business divisions: the Urban Development Division; the Urban Renewal Division; the Corporate Marketing Division; and the Corporate and Finance Division. Landcom Head Office is located in Parramatta but it has other offices at Newcastle, Zetland, and Campbelltown. It also has a number of Sales Offices located on major estates.

Landcom's greenfield residential operations are concentrated in outer metropolitan locations south-west, west and north-west of Sydney. Greenfield industrial operations are focused on the Corporation's remaining landbanked areas in Sydney's south-west. In contrast, Landcom's urban renewal projects are concentrated in inner and the middle-ring Sydney.

Current Businesses, Products and Services

While Landcom's main role is in facilitating urban development, it is not a builder or a construction company. Typically, masterplanning and rezoning processes are carried out under Landcom's direct control; built form is delivered in partnership; and public domain infrastructure (and associated civil works) is either delivered by Landcom directly or through development partners.

Landcom's products therefore fall into three main categories:

1. Landcom develops land as serviced residential and (to a lesser extent) commercial and industrial land. Much of this residential land is sold to the public as individual house lots. Most industrial land is sold to private business interests in the same way. Landcom has little control over the final built form under these arrangements.
2. Landcom sells a proportion of its house lots to builders instead of directly to the public. The builders are required to construct house-and-land packages to Landcom specifications. The completed homes are then sold on to private purchasers. Since the sale of these lots is subject to builders complying with Landcom's requirements and design guidelines, the Corporation is able to exercise a degree of control over the built form outcome in these projects, and uses this additional control to promote its key sustainability and urban design objectives.
3. Landcom redevelops unused or derelict land in established urban areas for residential and/or commercial purposes. These sites are generally masterplanned by Landcom and developed through partnering arrangements with the private sector. Since Landcom is usually linked to the development process through to the completion of the project, this approach guarantees the Corporation greatest control over the final built form.

2. THE EMS OVERVIEW

Landcom is committed to responsible environmental management and to this end it has implemented an Environmental Management System (EMS). Landcom's EMS is designed to conform to the requirements of AS/NZS ISO 14001, the Australian / New Zealand Standard for Environmental Management Systems. Landcom's EMS was first accredited in November 2000.

Landcom's EMS forms an integral part of its Sustainability Strategy and Triple Bottom Line (TBL) program. All Landcom's environmental management documentation and related information are available through Landcom's electronic document management system "Docview" and the Intranet.

The EMS Overview is intended to provide an overview of how Landcom's EMS works. The Overview outlines:

- the nature of Landcom's activities,
- how and where the System addresses the requirements of AS/NZS ISO 14001, and
- Landcom's environmental management structure.

There are principally two types of activities within Landcom that are addressed by the EMS. These are:

- Land Development activities – Urban renewal and urban development activities including land acquisition, masterplanning and urban design, infrastructure delivery, land subdivision and delivery of built form.
- Business support activities – including legal, marketing and sales, finance, IT and administration.

Environmental Management Procedures

The Environmental Management Procedures detail requirements for relevant personnel in managing the environmental aspects of their day-to-day activities.

The Environmental Management Procedures fall into the following categories:

1. System procedures
2. Development procedures
3. Business support procedures

System procedures – detail the actions that are required to ensure that the system is implemented and maintained in accordance with ISO 14001. System Procedures include:

- EMS_01 – Identification of Project Specific Environmental Aspects & Impacts
- EMS_02 – Environmental Legal and Other Requirements
- EMS_03 – Sustainability Awareness and Training
- EMS_04 – Sustainability Induction Checklist
- EMS_05 – Communicating Sustainability
- EMS_06 – Document and Record Control
- EMS_07 – Operational Procedures for Environmental Management
- EMS_14 – Monitoring and Measurement Procedure
- EMS_15 – Non-conformance Control, Corrective and Preventative Action
- EMS_16 – EMS Audit
- EMS_17 – Site Environmental Audits
- EMS_20 – Management Review

Development procedures – guide the day-to-day actions required to incorporate sustainability in Landcom's development projects. These procedures include:

- EMS_08 – EMS Procedures for Design Stage
- EMS_09 – EMS Procedures for Project Management and Construction Stage
- EMS_10 – EMS Procedures for Partnering with Private Sector Developers
- EMS_01/1 – Environmental Assessment Package for Project Managers
- EMS_18 – Site Environmental Audits Checklists – Civil Works Contracts
- EMS_19 – Site Environmental Audits Checklist – Builders

Business support procedures – guide the day-to-day actions required to implement the EMS requirements in business support activities such as office administration, marketing, IT, etc. These procedures include:

- EMS_11 – Waste Reduction & Purchasing Policy (WRAPP)
- EMS_12 – Office Environmental Procedures
- EMS_13 – Office TBL Annual Report Template

Related Documentation and Information

Elements of the Environmental Management System refer to the following complimentary systems, supporting documentation and information:

- Landcom Sustainability Strategy
- Triple Bottom Line (TBL) indicators, objectives and Targets
- TBL reporting system and annual TBL Reports
- Environmental Regulatory Requirements
- Environmental induction training
- Environmental records
- Environmental Management: A Guide for Landcom's Project Managers and Civil Contractors
- Managing Urban Stormwater: Soil and Construction "The Blue Book"
- Landcom DocView
- Business Continuity Plan
- Environmental Brief for Project Managers
- Site Environmental Audit Report Template

3. SUSTAINABILITY STRATEGY

Sustainability is not a static concept for Landcom. The Corporation recognises that a culture of sustainable practice must be integrated into all of its business decision-making processes – from buying computers for administrative use to developing major suburbs.

Landcom's Corporate Plan is an important tool for the delivery of the organisation's vision and mission, forming a bridge between the commitment to social, environmental and economic sustainability and the planning required for the day-to-day delivery of its products and services. Sustainable development and TBL performance reporting are among the Corporation's priorities, emphasising the fact that Landcom's commitment to sustainable outcomes is not simply rhetoric.

While TBL reporting alone does not guarantee sustainable outcome, it facilitates the integration of sustainability criteria into Landcom's decision-making by enabling the Corporation to observe the real social, environmental and economic outcomes of its decisions. Importantly, it facilitates continual improvement to ensure that Landcom adheres to its sustainable development commitment.

Accordingly, Landcom adopts the following four key sustainability guiding principles which go beyond minimum regulatory compliance:

1. Deliver a sustainable quality of life.
2. Conserve resources.
3. Protect biodiversity.
4. Minimise pollution.

Landcom's objective is to achieve the sustainability targets which have been developed from these guiding principles.

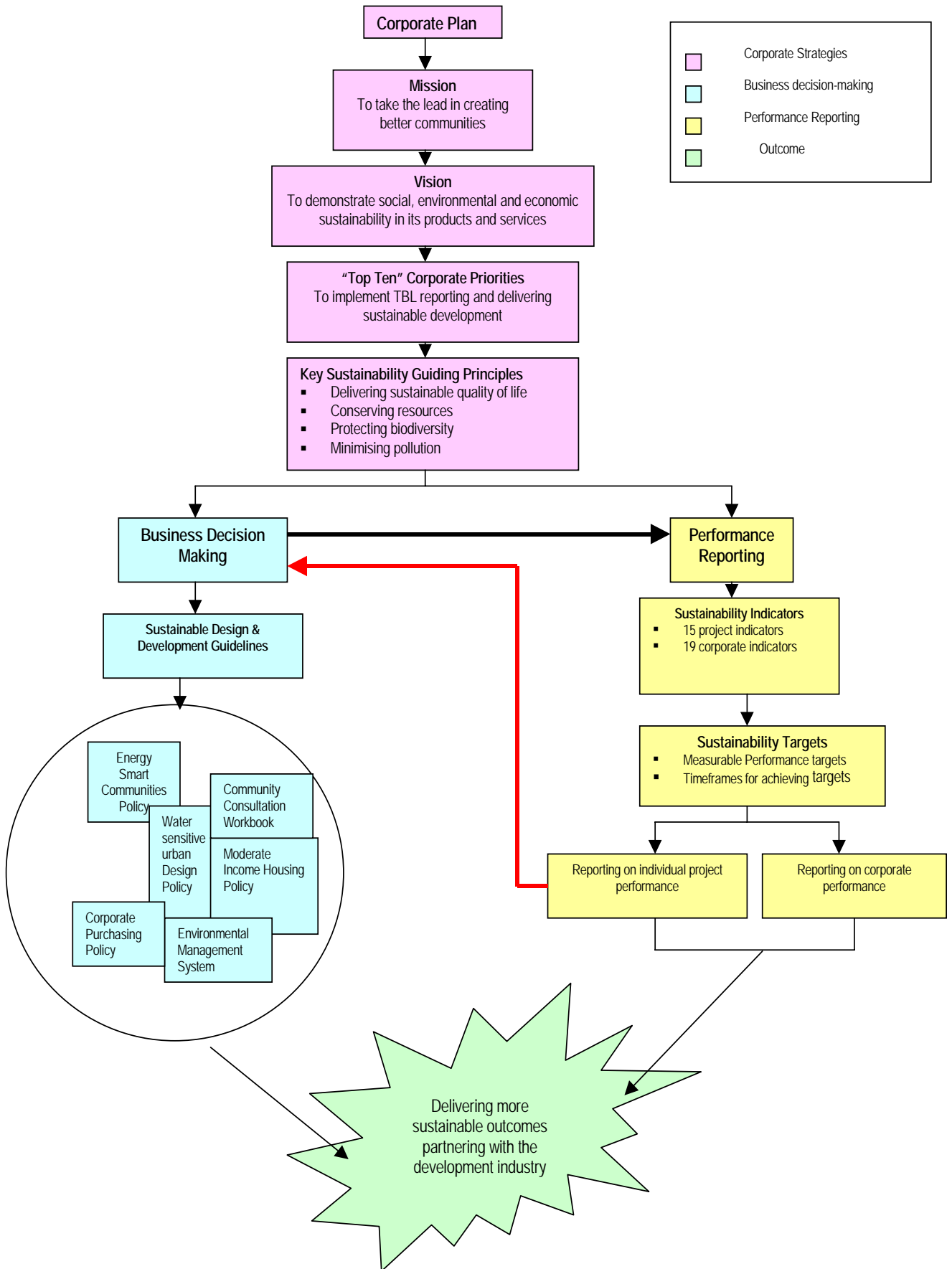
Sustainability performance criteria and targets based on the guiding principles are compulsory requirements in all tender specifications for the selection of builders and developer partners. They are also part of the formal evaluation of tender bids. For service providers such as project managers, civil works and landscape contractors, sustainability criteria are part of a pre-qualification process, ensuring that only those organisations with acceptable sustainability experience and credentials are included in the tender process.

Landcom's entire sustainability strategy follows on from the four key guiding principles. For example, sustainable design and development criteria are developed for design consultants, builders and developer partners such as the *Energy Smart Communities Policy, the Water Sensitive Urban Design Policy, Social Sustainability Policy, Moderate-Income Housing Policy and Community Consultation Workbook*.

Since 2002 each Landcom project has been monitored against sustainability criteria and performance targets through the TBL reporting program. The public reporting of Landcom's performance against these goals will make the Corporation more accountable by allowing stakeholders to question results, to better understand the constraints that Landcom faces and to challenge the Corporation to strive harder.

Landcom's journey to TBL reporting has focused the entire organisation not only on its performance, but also on its commitment to sustainability. TBL reporting has made sustainability an integral component of every project and therefore a key factor in the evaluation of Landcom's performance as well as that of its consultants, contractors, builders and developer partners.

Note – Landcom's Environmental Policy was replaced by the Sustainability Strategy following the implementation of the Triple Bottom Line program in 2002.



4. PLANNING

Environmental Aspects

The environmental aspects of Landcom's activities are reviewed annually to ensure that they remain current. The environmental aspects of Landcom's operations have been identified through workshops and interviews of Landcom personnel and external project managers. Assessment of environmental aspects are focussed on both office and development activities. The environmental aspects of the office activities are determined to be considerably less significant than the development activities.

The annual review of environmental aspects also takes into account legislative and other requirements, changes in technological options, past performance, TBL outcomes and other factors such as financial and business requirements.

The environmental aspects of Landcom's core development activities are considered at two levels, namely:

- Design related aspects such as masterplanning, urban design, architectural design, landscaping design and engineering design.
- Construction related aspects such as civil works and building construction.

For most projects, Landcom directly manages the civil works. However, Landcom is not a builder and does not directly manage or control building construction. Building construction is managed by Landcom's partners through contractual conditions.

Design related environmental sustainability is addressed through project specific sustainability design and development criteria which are developed based on Landcom's TBL indicators and targets. As urban planning and development has long-term environmental and social impacts, Landcom's priority is to ensure sustainability is incorporated, as early as possible, in the design stage so that the opportunities for sustainable development are not limited or lost in subsequent delivery stages.

Landcom's TBL indicators and targets address the following broad aspects:

- Integrated water cycle management
- Moderate income housing
- Community consultation
- Community facilities and amenity
- Community development
- Community and consumer education on sustainable living
- Waste reuse and recycle
- Energy efficient design
- Design guidelines
- Renewable energy generation
- Biodiversity Conservation
- Riparian corridor management
- Indigenous heritage conservation
- Non-indigenous heritage conservation
- Regulatory compliance
- Sales revenue
- Sales margin
- Return on sales
- Earning before tax and interest (EBIT)
- Return on equity
- Return on total operating assets
- Debt to equity ratio
- Returns to Government
- Job creation
- Internal and external training
- Supplier pre-qualification
- Stakeholder relationship management

- Employee retention rate
- Energy and greenhouse – office operations
- Strategic and complex developments
- Aboriginal employment opportunity

For Landcom's construction activities, all external project managers are required to assess the significance of site environmental aspects using a customised checklist (EMS_01/1). The civil works contractors are required to develop and implement a site-specific Environmental Management Plan (EMP) addressing the significant site environmental aspects.

To assist with the preparation and implementation of the site-specific EMPs, Landcom has developed a document entitled "Environmental Management: A Guide for Landcom's Project Managers and Civil Contractors" which includes an EMP example. Stormwater drainage design and management must be in accordance with the industry best practice guidelines – "Managing Urban Stormwater: Soil and Construction" (the Blue Book).

Refer to the following for further detail:

- ✓ EMS_08 - EMS Procedures for Design Stage
- ✓ EMS_09 - EMS Procedures for Project Management and Construction Stage
- ✓ EMS_10 - EMS Procedures for Partnering with Private Sector Developers
- ✓ EMS_01/1 - Environmental Assessment Package for Project Managers
- ✓ Triple Bottom Line Tender Schedule for Partnership Tenders
- ✓ Energy Smart Communities Policy
- ✓ Water Sensitive Urban Design Strategy
- ✓ Environmental Management: A Guide for Landcom's Project Managers and Civil Contractors
- ✓ Managing Urban Stormwater: Soil and Construction - Blue Book

Landcom's Environmental Aspects and Impacts

Environmental Aspect	Potential Impact
Air	<ul style="list-style-type: none"> ▪ Availability and accessibility of public transport and alternative methods of transport to reduce energy use and greenhouse gas emissions. ▪ Equipment exhaust, dust and odour are the main issues resulting in potential air pollution from site activities. ▪ Office energy use contributes to the release of Greenhouse Gases ▪ Global warming has been linked with the increased emission of gasses such as carbon dioxide and methane (landfill gas).
Water	<ul style="list-style-type: none"> ▪ Office water use contributes to a reduction in available potable drinking water ▪ Water use for activities other than for drinking or primary contact uses reduces water available for drinking water
Surface Water	<ul style="list-style-type: none"> ▪ Minimising impervious surfaces in urban design and incorporate principles of water sensitive urban design. Impervious surfaces increase the volume and flowrate of stormwater. ▪ Urban development can alter hydrological characteristics. ▪ Development works have the potential to pollute waterways (increased sedimentation and nutrients load) and degrade aquatic environments.
Groundwater	<ul style="list-style-type: none"> ▪ Groundwater contamination can occur from hazardous material spillage (eg. fuel). ▪ Groundwater contamination may exist as a result of past activities on site prior to acquisition.
Soil and Geology	<ul style="list-style-type: none"> ▪ Soil erosion is a significant environmental impact associated with development activities. Topsoil is slow to regenerate and is essentially a non-renewable resource. ▪ Design and management measures should consider geological characteristics. ▪ Implementation of effective erosion and sedimentation controls during construction minimises the movement of pollutants both on and off-site. ▪ Potential impact of development on urban salinity should be investigated and minimised.
Biodiversity	<ul style="list-style-type: none"> ▪ Potential impact of development on the native flora and fauna must be thoroughly investigated and taken into account during siting of the development and initial planning stages. ▪ Careful planning and management can minimise or prevent loss of biodiversity and impact on significant ecological communities. ▪ Management of weeds and feral animals contributes to improved biodiversity on land managed by Landcom

Environmental Aspect	Potential Impact
Bushfire	<ul style="list-style-type: none"> Uncontrolled bushfire can destroy biodiversity, life and property, and contribute to poor air quality
Heritage	<ul style="list-style-type: none"> Indigenous and non-indigenous heritage is an important component of the social environment. Design and management measures can incorporate strategies to preserve and protect areas of importance and ensure the sustainability of heritage values. Adaptive reuse heritage buildings can reduce wastage of resources.
Resource Consumption	<ul style="list-style-type: none"> Resources such as land, potable water, energy, topsoil and construction materials are valuable and should be conserved in every stage of Landcom's activities to achieve sustainability. Use of materials with recycled components can reduce the adverse impact on limited resources. Office and site activities result in consumption of resources such as electricity, fuel, water, paper, etc.
Waste	<ul style="list-style-type: none"> Waste materials result from construction and demolition (C&D) activities. C&D waste quantities can be significant for urban renewal projects. Waste materials also result from office activities. Effective planning and management can prevent unnecessary disposal to landfill and consumption of resources. Recycling and reuse options must be considered on all projects with significant quantities of C&D waste.
Noise & Amenity	<ul style="list-style-type: none"> Urban developments can have long-term noise impacts. Design initiatives in master planning stage should take into consideration potential short and long-term noise impacts. Construction activities can generate significant periodic noise. Potential for light pollution.
Hazardous materials	<ul style="list-style-type: none"> Environmentally hazardous materials used by Landcom's contractors include fuel, oil, chemicals, acids and solvents. On-site and off-site impacts to land, aquatic and groundwater environments can result from spills, incorrect handling and storage. Incorrect handling of asbestos containing materials, lead and other contaminants during development works can potential result in health implications. Potential health and environmental impacts of use of building and construction materials containing hazardous components.
Site Contamination	<ul style="list-style-type: none"> Site contamination resulting from previous or current land uses. Prevention or cleanup of contamination can prevent localised or dispersed contamination both on and off site.

Legal and Other Requirements

Landcom is required to comply with all state and local government laws and potentially can incur the penalties associated with prosecution under these laws. Development Managers are responsible for identifying the requirements of Development Control Plans (DCPs) and Local Environmental Plan (LEP) from the relevant local council for their projects. DCPs are available on Council websites. These plans outline all the legal requirements as they relate to land/property development. The DA consent conditions also identify all the environmental legal requirements for each project.

The Environment Manager is responsible for reviewing the Government Gazette and other publications that Landcom subscribes to (eg. Environment Manager, Environment Business, etc.) monthly and identifying any proposed changes to relevant environmental legislation. The Environment Manager is also responsible for **disseminating information** (i.e. not giving legal advice) to all relevant staff relating to environmental:

- State level legislative requirements and changes; and
- standards and guidelines.

Legal advice on specific matters is sought from Landcom's Legal Services team.

Briefing sessions are held to update staff on new legislation or relevant amendments to existing legislation as needed.

Refer to the following for further detail:

- ✓ Environmental Legal and Other Requirements (EMS_02)

✓ Docview

Objectives, Targets and Programs

Objectives and targets are set through the Triple Bottom Line (TBL) program for the indicators which were determined by the stakeholders to be significant for Landcom's activities.

Landcom's TBL indicators, objectives and targets were set through an extensive stakeholder consultation process detailed in the Towards Sustainability Report 2002. The consultation process also included a 30-day public exhibition.

Refer to the following for further detail:

- ✓ Towards Sustainability Report 2002
 - ✓ Triple Bottom Line Targets
 - ✓ Yearly Sustainability and Annual Reports
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5. IMPLEMENTATION AND OPERATION

Resources, Roles, Responsibility and Authority

Landcom's Environmental Management System has been designed to reflect the structure and activities of Landcom. Landcom is committed to its environmental responsibilities at the highest level. All Landcom employees, contractors, consultants and project partners are responsible for the maintenance of high environmental standards. All Position descriptions specify the requirement for compliance with the EMS responsibilities. These responsibilities are communicated through the environmental inductions.

Refer to EMS Roles and Responsibilities on the Intranet.

Competence, Training and Awareness

The Landcom environmental induction training ensures that employees at all relevant levels are aware of:

- Landcom's Sustainability Strategy and guiding principles
- Sustainability criteria for Expressions of Interest, partnering tenders and design briefs
- Triple Bottom Line (TBL) indicators and targets
- TBL reporting
- Overview of EMS
- Environmental roles and responsibilities
- EMS procedures relevant to their tasks
- Performance Improvement Reviews (i.e. site environmental audits)
- Paper reuse and recycling policy

Personnel performing specific assigned tasks are competent on the basis of education, appropriate training and/or experience as required. Employee induction training includes a component outlining the responsibilities of individuals within the Landcom EMS, and addresses the above issues.

Internal briefing sessions, seminars and workshops are held as required to update development staff with regard to latest technologies and principles for sustainable development.

Civil contractors receive environmental management induction as part of their pre-qualification process.

Similarly, an environmental training program is periodically provided to builders working on Landcom sites.

Refer to the following for further detail:

- ✓ EMS_03 – Sustainability Awareness and Training
 - ✓ EMS_04 – Induction Records
 - ✓ Development Managers Seminar
 - ✓ Landcom Training Program (Employment Relations)
 - ✓ Builder Training Program and Site Audit Program
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Communications

Landcom recognises the need for effective communication internally, between all levels and divisions of the organisation, and externally. Communication is important to:

- ensure that all Landcom personnel are aware of Landcom's environmental sustainability objectives,
- ensure that all Landcom personnel are aware of environmental issues relating to Landcom's activities,
- demonstrate commitment to environmental sustainability,
- learn from others experience in implementing innovative environmental solutions, and
- to respond to contractor, customer and community concerns.

The following is the internal communication forums:

- The Board is updated at least annually by the Director Sustainability & Policy prior to the TBL report publication.
- The Executive team is briefed weekly during Executive Committee meetings by the Director sustainability & Policy.
- The Development Directors and other managers are briefed by the Environment Manager when new relevant or changes to existing relevant information arises.
- Staff are briefed through monthly Staff Meetings by the Managing Director and through the knowledge briefings presented by their peers.

Internal environmental communication is carried out through the intranet. Externally, environmental news is communicated to Landcom's stakeholder through the Annual Reports, annual Sustainability Reports and other corporate communication media. Other specific publications and industry forums are also used for external communications (eg. Local Agenda).

In addition, on-going and regular liaison is maintained with all project managers and contractors regarding environmental requirements. Liaison with local councils, regulatory authorities, community groups and the general public is also maintained regarding Landcom's environmental performance through the annual Sustainability Reports, Landcom forums such as the "Local Government Conference" and the "Sustainability Conference".

Refer to the following for further detail:

- ✓ EMS_04 - Communication
 - ✓ Directions magazine
 - ✓ Landcom Intranet
 - ✓ Towards Sustainability Report 2002
 - ✓ Annual Sustainability Reports
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Documentation and Document Control

The approach to documentation of the Landcom EMS at the various levels within the organisation has been to ensure that documentation is available to assist in improving environmental outcomes and the demonstrate compliance with the system.

Document control procedures are maintained to ensure that all documents required by the Environmental Management System can be located, can be periodically reviewed, revised where necessary and approved by authorised personnel and contain all necessary information. Procedures for the identification, maintenance and disposition of environmental records form part of the EMS.

To achieve document control and access objectives Landcom uses the Docview document management system or the Intranet. All EMS procedures are available to Landcom staff through these systems.

Refer to the following for further detail:

- ✓ EMS_05 - Documentation and Document Control
 - ✓ Docview
 - ✓ Triple Bottom Line (TBL) database
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Operational Control

Landcom's core development activities have been identified and procedures have been developed to ensure operations are carried out with minimum or no adverse environmental impacts. The purpose of establishing guidelines and procedures for routine operations is to ensure that projects are undertaken with due consideration for environmental sustainability objectives. The procedures are developed in line with Landcom's Sustainability Strategy.

Refer to the following for further detail:

- ✓ EMS_07 - Operational Procedures for Environmental Management
 - ✓ EMS_08 - EMS Procedures for Design Stage
 - ✓ EMS_09 - EMS Procedures for Project Management and Construction Stage
 - ✓ EMS_10 - EMS Procedures for Partnering with Private Sector Developers
 - ✓ Examples of Tender Schedules for Sustainability
 - ✓ EMS_17 - Site Environmental Audits
 - ✓ Schedule for Protection of the Environment - Standard Tender Documentation for Civil Works
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Emergency Preparedness

To effectively manage Landcom's activities potential emergency situations have been identified and included in the EMP Guide (for example, fuel spillage impact on protected environments). The Project Managers and Civil contractors are required to prepare and implement an emergency response plan for every project as a part of their site-specific EMP.

Responsibility for identification of potential emergencies, formulation of specific response procedures and implementation of response procedures for each site rests with the external Project Manager, Superintendent and the Civil Contractor.

Landcom's Business Continuity Plan also incorporates environmental emergency risks and contingency planning.

Refer to the following for further detail:

- ✓ Business Continuity Plan
 - ✓ EMS_15 - Non-Conformance Control, Corrective and Preventative Action
 - ✓ EMS_20 - Management Review
 - ✓ EMS_05 - Communicating Sustainability
 - ✓ EMS_01 - Identification of Project Specific Significant Environmental Aspects and Impacts
 - ✓ EMP Guide
 - ✓ Standard Tender Documentation
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6. CHECKING AND CORRECTIVE ACTION

Monitoring and Measurement

Landcom has set key performance indicators and targets for environmental sustainability through its Triple Bottom Line program. Environmental sustainability performance is monitored through the following mechanisms:

- Triple Bottom Line reporting system – data collection and reporting against targets.
- Performance Improvement Reviews (PIRs) - site environmental audits during construction works.
- EMP Report Cards – for monitoring site-specific environmental issues during construction works.
- WRAPP monitoring and reporting.
- EMS surveillance and certification audits.

Refer to the following for further detail:

- ✓ Towards Sustainability Report 2002
 - ✓ Triple Bottom Line Targets
 - ✓ Sustainability and Annual Reports
 - ✓ EMS_20 - Management Review
 - ✓ EMS_16 - Environmental Management System Audit
 - ✓ EMS_17 - Site Environmental Audits
 - ✓ EMP Report Cards
 - ✓ EMS_11 - Waste Reduction & Purchasing Policy (WRAPP)
-

Evaluation of Compliance

Compliance with legal and other requirements is evaluated through the following:

At Organisational level

- Corporate governance framework (internal and external audits) overseen by Audit and Risk Sub-committee of the Board.
- Annual compliance evaluation against statutory requirements reported through the Annual Report (see Landcom Annual Reports).
- EMS audits.

At project level

- Development approvals and construction compliance certificates.
- Evaluation of environmental and other legislative compliance reported through TBL indicator 15 (see EMP report Cards and TBL indicator 15).
- Evaluation of project legal and other risks as part of Landcom's Risk Management Policy.
- Site Environmental Audits.
- Site OH&S Audits.

Nonconformity, Corrective and Preventative Action

The purpose of reporting on non-conformance, corrective and preventative action is to ensure any adverse environmental impacts are mitigated and corrective/preventative actions are implemented where required. This information also contributes to the process of continual improvement of the Environmental Management System. Any amendments that are required to the EMS in response to non-conformance are incorporated into the relevant documents.

Refer to the following for further detail:

- ✓ EMS_20 - Management Review
 - ✓ EMS_15 - Non-Conformance Control, Corrective and Preventative Action
 - ✓ EMS_16 - Environmental Management System Audit
 - ✓ EMS_17 - Site Environmental Audits
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Environmental Management System Audit

Regular audits are carried out to ensure that Landcom complies with the requirements of its Environmental Management System certification.

The following checking mechanisms are used for this purpose:

- Site Environmental Audits – conducted by consultant environmental auditors appointed by Landcom.
- Internal EMS audit conducted by an independent party annually prior to surveillance audits and certification audits.
- EMS certification surveillance audit conducted by the certification body every 12-months.
- EMS certification audit conducted by the certification body every three years.

Refer to the following for further detail:

- ✓ EMS_15 - Non-Conformance Control, Corrective and Preventative Action
 - ✓ EMS_16 - Environmental Management System Audit
 - ✓ EMS_17 - Site Environmental Audits
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7. MANAGEMENT REVIEW

Landcom's Executive Committee reviews the Sustainability Strategy and performance against the TBL indicators, objectives and targets annually. The Executive and the Board review the Triple Bottom Line (TBL) outcomes annually prior to publication of the TBL or Sustainability Report.

Landcom's EMS is reviewed by the Environment Manager continuously in close consultation with the development teams and other relevant staff. The amendments are signed off by the Director Sustainability and Policy and the Executive Committee.

The Environment Manager conducts an annual Management Review after the annual EMS surveillance or certification audits have been completed. An action plan is developed and monitored quarterly by the Risk and Audit committee.

The Management Review includes the following:

- Results of audits and compliance evaluation
- Status of CAR's
- EMS Audit Action Plan,
- Changes to core operations (if any) and their impacts on EMS policies and procedures,
- Revised policies and procedures, and
- Revised EMS Overview document.

The Executive Committee is responsible for endorsing proposed changes.

Refer to the following for further detail:

- ✓ EMS_20 - Management Review
 - ✓ Landcom's Sustainability Strategy
 - ✓ Towards Sustainability Report 2002
 - ✓ Sustainability and Annual Reports
 - ✓ Triple Bottom Line Targets
-