TASGRN079 Mount King William

Comstar Systems Construction Environment Management Plan (Draft)

GUIDELINES FOR WORKS & SERVICES

The Contractor shall as a minimum, comply with the requirements of relevant Commonwealth and Tasmanian Legislation, Regulations, Codes of Practice and Environment Policies inclusive of any recent updates. In addition, the Contractor shall abide by the approval permit requirements and conditions as detailed herein. The Contractor's incident and progress reporting systems shall provide for immediate, weekly and monthly responses as appropriate to the various construction and environmental issues proportionate to the issue's criticality levels.

The Contractor is responsible for implementing sound, professional construction and environmental management procedures and practices including the control of their sub-contractors to these same standards. The project proponent's officers will regularly monitor and audit the Contractor's systems and actions to ensure that the construction quality and the environmental outcomes are achieved. The primary reference source for the monitoring and the more formal audits is the Contractor's CEMP (as approved for construction) and it's practices in addressing the CEMPR sourced Environmental Protection Requirements(EPRs) and Guidelines (EPGs).
Depending on the circumstances, the type and seriousness of any breach of the construction permit(s) and other construction conditions, either the PPRWS Project Manager or the Contractor's manager will be obligated to report same to the relevant government agency.
The relevant legislative requirements applicable to the Contractor's CEMP include but are not limited to the following:

- Workplace Health and Safety Act,2012 (TAS) and Regulations;
- Workplace Standards Tasmania guidelines;
- Environmental Management and Pollution Control Act, 1994; (Cth)
- Environmental Management and Pollution Control Amendments Act, 2000 (Cth);
- Environment Protection & Biodiversity Conservation Act, 1999 (Cth) referred to as EPBC Act;
- Land Use Planning and Approvals Act, 1993 (Tas);
- Aboriginal Relics Act, 1975 (Tas);
- Historic Cultural Heritage Act, 1995 (Tas);
- Threatened Species Protection Act, 1995 (Tas) (TSPA);
- Nature Conservation Act, 2002 (Tas) (NCA)
- Weed Management Act, 1999 (TAS).

Version Control	Written By	Date
Draft V1.1	Donald Chong (Downer Project Manager) & Michael McLoughlin (Downer Deployment Engineer)	14/12/2022
V1.2	Donald Chong (Downer Project Manager) & Michael McLoughlin (Downer Deployment Engineer)	08/08/2024
V1.3	Tony Doherty (Comstar National Operations Manager) & Darren Bowden (Comstar National Construction Manager)	10/05/2025
V1.4	Tony Doherty (Comstar Systems National Operations Manager) & Darren Bowden (Comstar National Construction Manager) Reviewed Downer CMP and updated the CMP to Comstar Systems as assigned contractor. Updated CMP with additional information from EPBC referral and specific particular manners listed in the referral decision (EPBC 2024/09816)	12/07/2025

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1.0 INTRODUCTION, SCOPE & PURPOSE

The Tasmanian Government Radio Network (TasGRN) is a collaborative project to transition eight core user organisations, currently using five separate radio communications networks, onto one unified, digital and interoperable radio network.

The end result will be a more reliable and resilient network enabling the provision of better services to the Tasmanian community.

The TasGRN will deliver an integrated radio network for users in the emergency services, land management and electricity industries. Initial users of the TasGRN will include:

a) Tasmania Police;
b) Tasmania Fire Service;
c) Ambulance Tasmania;
d) State Emergency Service;
e) Parks (part of Department of Natural Resources and Environment Tasmania formerly Department of Primary Industries, Parks, Water and Environment);
f) Sustainable Timber Tasmania;
g) TasNetworks; and,
h) Hydro Tasmania

Mount King William is part of the TasGRN network and this documentation details the Construction Environment Management Plan for this key infrastructure.

2.0 ORGANISATION STRUCTURE & RESPONSIBILITIES

Comstar Systems will provide a project organisation / management structure showing the responsibility of the office-based Project Manager to the onsite Site Supervisor (Person In Charge of Site).

Subcontractors structure and responsibilities will be approved by the Comstar Systems Project Manager once engagement is confirmed.

Subcontractors structure and responsibilities will be approved and co-ordinated by the Comstar Systems Project Manager.

Comstar Systems Team Members	Role	HSE / Zero Harm / Risk / Incident Management	Scheduling / Subcontractor Engagement	Site Supervision & Induction	Change Request	Design Review & Signoff	CMP Review & Signoff	Construction Hold Point / Audit Review & Signoff
Darren Bowden	National Construction Manager / QEHS	A	R	A	R	A	R	A
Ben Williams	Site Supervisor / Senior Civil Supervisor	R	A	R	A			R
Dan Cave	Asset Procurement / Logistics and Stores		A					
Michael Brown	Project Manager – Technical and Rigging	R	A	I	R	C	C	A
Michael Knight	Commercial		C				C	C

R – Responsible, A – Accountable, C - Consulted, I – Informed

3.0 RISK MANAGEMENT PLAN (SAFETY & ENVIRONMENTAL)

A health & safety review will be undertaken prior to commencement of construction works on site. This includes:

a) Safe Work Method Statement (SWMS) document capturing identified scope and hazards including risk analysis and mitigation plan to eliminate, isolate, reduce or control hazards.
b) Method of Procedure (MOP) document to capture specific construction scope with reference to the SWMS document.

This SWMS / MOP documents will form part of the induction process for all subcontractors and visitors to site. These documents will also be reviewed daily by the Comstar Systems Site Supervisor and any change on risk or hazards will also be updated by the Comstar Systems Site Supervisor and approved by the Comstar Systems Superintendent.

Comstar Systems will supply all SWMS / MOPS for review if required by authorities and hard copies of these documents will also be available on site in the site safety folder.

Hazard Identification

A hazard review shall be undertaken prior to the initial commencement of any works and is to be regularly reviewed. The relevant task documentation must record how the risks associated with the hazards are to be eliminated, isolated, reduced or controlled.

Hazard introduction to and risk control at work site

The work site will not remain static in regard to hazards and risks. The risks presented by such hazards must be reduced to an acceptable level by taking appropriate mitigation steps typically as recorded in a JSA and/or SWMS. The situation and any change in the hazard or its location must be communicated to those authorised to access the work site.

Risk Assessment

Comstar Systems will use an industry acceptable risk assessment system and documentation during the construction period. Refer to next sections – JSA and SWMS.

Job Safety Analysis (JSA)

Comstar Systems will maintain their QEHS Risk Assessment Procedures and Plan and any new JSA's will be reviewed and approved by the Comstar Systems QEHS Manager prior to the implementation.

Safe Work Method Statements (SMWS)

Comstar Systems will provide the full set of SWMS for review in the Site Folder, with any new SWMS to be reviewed by the Comstar Systems QEHS Manager and Project Manager before being implementation.

Material Safety Data Sheets

Comstar Systems shall store all fuel, lubricants and chemicals within containment facilities with adequate security protection from unauthorised interference. This/these fuel and chemical storage facilities will be designed to prevent the release of spilt substances into the

environment. Where practicable, servicing will be undertaken from these facilities A copy of the Material Safety Data Sheet (MSDS) for each chemical will be supplied on site within the Construction Safety Folder.

Weather Monitoring & Trigger Points

Comstar Systems shall record the nominated weather and climate data at the worksite every day that the site is attended. Certain construction activities are conditional to suitable weather and ground conditions. Comstar Systems shall nominate the minimum weather data that will be collected. Comstar Systems construction methodology statements or this section of the CEMP (and referenced by the SWMS and/or JSA's) the critical conditions and their trigger points used to change or halt construction activities shall be nominated.

Comstar Systems site supervisor will monitor and assess weather condition each day as per the JSA requirement. This forms a trigger point for the Comstar Systems site supervisor to change, halt or proceed with construction activities on a day-to-day basis. To minimise the risk of wildfire ignition from the undertaking of works Hot works must be suspended immediately once the Forest Fire Danger Index (FFDI) is calculated as equal to or greater than HIGH 20, or the relative humidity is equal to or less than 30%. Hot works must not resume until the Forest FDI has dropped below HIGH 20 and where the relative humidity is above 30%. Weather observations should be undertaken every two hours and recorded from 11am through to the end of the day during Fire Danger Rating of Moderate or above. Where stop work triggers of FFDI or RH are reached work must not re-commence until weather observations fall outside of the above stop work triggers. If conditions improve and work does recommence weather observation are to be monitored and recorded hourly for the remainder of the day.

Suitable extinguishers must be held onsite for potential electrical or fuel fires.

Erosion and Landslip Controls

Comstar Systems will as the minimum manage potential erosion issues and sediment release issues from the build site activities, with additional controls/actions depending on the season, weather conditions and other site variables as they arise. In some circumstances, the temporary halting of certain construction activities may be necessary to avoid either:

a) increasing the environmental damage risk to an unacceptable level; or

b) other unacceptable incidents.

Commstar Systems will review the risk of rock topple and rockfall and conclusions and actions as stated in the Landslip Report, Intrax, Oct 2022. (Attached at Appendix A).

Cultural Heritage

If, during the course of the proposed construction works, previously undetected Aboriginal heritage sites or objects are located, the processes outlined in the Unanticipated Discovery Plan should be followed (see Appendix A). A copy of the Unanticipated Discovery Plan should be kept on site during all ground disturbance and construction work. All construction personnel should be made aware of the Unanticipated Discovery Plan and their obligations under the *Aboriginal Heritage Ac 1975 (the Act)*. Under section 10(3) of the Act, a person shall, as soon as practicable after finding a relic, inform the Director or an authorised officer of the find.

Compliance with the EPBC Act

A referral on the proposed action at Mt Wedge and Mount King William, to the Department of Climate Change, Energy, the Environment and Water was assessed and found not be a controlled action if taken in a particular manner. Refer to document EPBC 2024/09816 in Appendix A.

Comstar must comply with all of the particular manners in this decision. Refer to EPBC Decision Notice at Appendix A

Weed and Hygiene and Natural Values

Construction Activities will be contained to the mapped project and disturbance areas outlined in the EPBC referral mapping.

Documents attached at Appendix A:

a) 02_MKW_TasGRN_Overview

Comstar will adhere to the EPBC particular manners relating to Weed, Hygiene and Natural Values as listed below:

The person taking the Action must:

a) not clear:

   i) more than 0.0160 ha of native vegetation inside the Mt King William Action area;

b) not undertake any works, other than haulage, outside of the Action area;

c) undertake weed management in accordance with the Weed and Disease Planning and Hygiene Guidelines and the Construction Management Plans, including ensuring there is no weed incursion at the Action area until completion of the action.

d) revegetate all areas not required to remain cleared after construction with local native vegetation; construction areas will be further defined to mitigate impacts on vegetation.

A construction site boundary will be marked onsite to limit incremental growth during works.

This will occur as a pre-start activity in consultation with an ecologist and will include the onsite selection of temporary lay down areas, and the use of existing tracks as much as practical to avoid permanent impacts to native vegetation.

Comstar will include all North Baker Natural Values Assessment (NVA) and recommendations in our risk management plans. A copy of the NVA and its recommendations are attached in Appendix A with the recommendations highlighted in Section 13 of this documentation.

Comstar will also implement all North Baker Weed and Hygiene Management Plan (WHMP) recommendations. A copy of the WHMP and its recommendations are attached in Appendix A with the recommendations highlighted in Section 14 of this documentation.

Measures must be adopted to mitigate the potential spread of weed seeds or plant material, chytrid and other pathogens from machinery or soil embedded on/within machinery arriving at the works area (including being washed down with Phytoclean, Trigene or acceptable equivalents). See attached North Barker Weed & Hygiene Management Plan including wash down requirements prior to entering Mount King William.

Fauna

A pre-clearance survey to be conducted of the project area (including a 50 m buffer) consistent with the Tasmanian Devil Survey Guidelines and Management Advice for Development Proposals (Refer to section 13 North Barker Recommendations)

Review the flight path from the proposed off-site staging area at to ensure any nest locations are avoided during the breading season (Appendix A)

Confirm current Eagle Nest Surveys are up to date and valid for the build dates.

Material haulage (by road to staging area) will only occur during daylight hours to reduce the risk of native fauna roadkill.

Helicopter Operations

Site is accessible via helicopter only. A helicopter schedule will be developed prior to construction to facilitate access for plants, machineries and work crew. Unsafe or poorly maintained equipment is not to be operated on the worksite or transported by helicopter. Operator daily pre-start checks shall be used to validate plant and equipment conditions prior to helicopter lift.

Ensure helicopter access to the site is minimised in terms of wilderness quality during construction. Commstar will aim to minimise helicopter use days for the TasGRN project as a whole, by undertaking Mt King William and Mt Wedge construction concurrently with multiple build teams if possible.

The proposed action includes a total of up to 240 days of helicopter flights will be required for the construction of the TasGRN Facilities at Mount Wedge and Mount King William. 240 days is the total amount of flights across both sites.

Comstar Systems will adhere to the EPBC particular manners relating to the use of helicopters as listed below (Annexure A, Paragraph 1 (e)):

a) Not exceed 120 helicopter flight days at each site during construction, and must:

   i) ascend and descend gradually to reduce ‘blade slap’ noise;
   ii) not fly within 1000 metres line-of-sight of active Tasmanian Wedge-tail Eagle nests
   iii) during the Eagle management constraint period; iii) except where the safe conduct of the flight is jeopardised, adhere to Tasmanian Parks and Wildlife Service prescribed flight paths between the offsite staging area and the Action area;
   iv) except where the safe conduct of the flight is jeopardised or during landing and take-off at the Action area, maintain an altitude of at least 1,000 metres above ground level;

b) A permit to land authority will be required for the duration of the works and ongoing access from the Department of Natural Resources and Environment Tasmania.
c) Flight Paths: Flights from the staging areas will avoid raptor nests. Other less frequent flights from the Helicopter base in Cambridge will fly above 4000 feet (pending weather).
d) Comstar will adhere to Fly Neighbourly Advice Tasmanian World Heritage Area and Mt Field National Park, https://parks.tas.gov.au/Documents/Fly%20Neighbourly%207.pdf

Chemical Storage and Spill Risk

Comstar Systems shall store all fuel, lubricants and chemicals within containment facilities with adequate security protection from unauthorised interference. This/these fuel and chemical storage facilities will be designed to prevent the release of spilt substances into the environment. Where practicable, servicing will be undertaken from these facilities. A copy of the MDS for each chemical will be supplied on site within the Construction Safety Folder.

In the event of a spill, Comstar Systems and Telstra's spill procedures will be followed.

In accordance with Comstar Systems and Telstra's Environmental Policy and Managing Spills Procedure. Comstar Systems and Telstra staff and contractors are trained in Managing Spills, and a spill kit will be taken in the helicopter for easy access during all fuel deliveries, including:

a) Appropriate spill kits will be available and maintained for the duration of works,
b) Spill kits will be positioned sufficiently close and clearly marked to active construction activities to enable effective deployment in the event of a fuel or chemical spill,
c) If a fuel or chemical spill occurs outside a bunded area. Appropriate spill response must be followed to control, isolate and remediate the spill.
d) An inventory of spill response kits, their contents and location will be prepared and checked at least every six months.
e) Spill response drills should be conducted where appropriate and records kept

AS1940- s94.2 does not mandate spill kit requirements. Legislation under WHS Regulations (Tas) Section 357, requires the ability to manage spills. This is also reflected in the Bunding and Spill Management Guidelines, EPA Tasmania, December 2015.

Based on the works, 2 Spill Kits will be located on site, specifically:

a) Safely Clean Up Oil & Fuel Spills,
b) Portable truck spill kit - Safely Clean Up Oil & Fuel Spills

Refer to Documents at Appendix A:
Bunding and Spill Management Guidelines, EPA Tasmania, December 2015
Telstra Managing Spill Procedure V2, October 2018

Waste Management

Waste to be removed from site and dispose of either at a waste transfer site or approved location. Waste Management will be included in the weekly audits and inspections.

A dedicated and secure container/s will be located on site for the storage and management of waste as a result of cutting materials (ensuring minor fragments are collected and removed from site).

Waste management will occur in accordance with *Telstra's Waste Management Policy 31/5/2023* and also *Telstra's Waste Management Procedure 11/9/2020* contained at Appendix A.

Plant and Machinery

Comstar Systems will utilise a range of plant and machinery during the construction of the Mount King William site, including a hydraulic drill rig with an associated diesel-powered air compressor, a diesel generator, and various construction hand tools such as electric jackhammers.

All concrete required for the footings will be pre-mixed off-site and transported to the lower staging area. From there, it will be delivered to the build area using a kibble suspended from a helicopter, ensuring minimal on-site mixing and reducing environmental impact.

4.0 TRAINING & INDUCTIONS

Comstar Systems shall ensure that all employees, subcontractor employees and visitors to the worksite receive adequate inductions and if working on the site, relevant training in all aspects of this CEMP Requirements document. Induction records will be kept on site showing the date & time(s) and all the attendees must sign the record of attendance.

5.0 EMERGENCY MANAGEMENT PLAN

The worksite is remote from the majority of emergency services and parts of it do not have mobile phone coverage. Comstar Systems shall ensure that the onsite personnel and resources can safely and adequately deal with the initial response to typical field emergencies until appropriate back-up and/or professional emergency responders are able to reach the worksite. Satellite phones will be required for the Comstar Systems Site Supervisor if current site do not have any existing mobiles coverage.

The onsite Site Safety Document will also include responses to emergency communications, first-aid, fire and flood events, inclusive of site evacuation protocols.

6.0 INCIDENT MANAGEMENT PLAN

All incidents will be communicated by the Comstar Systems Site Supervisor with further reporting upwards to the QEHS Manager and Comstar Systems Project Manager. The Comstar Systems Site Supervisor will also be responsible for all incident investigation and carry out all remediation action as required.

See section 2.0 for responsibility metrics.

Key Comstar Systems contact details for incident management:

Comstar Systems Team Member	Roles	Mobile Number	Email
Darren Bowden	National Construction Manager / QEHS	0408 991 589	Darren@comstarsystems.com.au
Michael Brown	Project Manager	0472 816 307	micheal.brown@Comstar Systems.com.au
Ben Williams	Site Supervisor /Senior Civil Manager	0437 753 191	ben.w@comstarsystems.com.au
Michael Knight	Commercial	0428 394 171	michaelknight@comstarsystems.com.au
Tony Doherty	National Operations Manager	0429 638 997	Tony.doherty@comstarsystems.com.au

7.0 CHANGE MANAGEMENT PLAN

All Change Request will be communicated by the Comstar Systems Site Supervisor with further reporting upwards to the QEHS Manager and Comstar Systems Project Manager. The Comstar Systems design engineer will be responsible for approving all change requests and document the requests in the project folder. See section 2.0 for responsibility metrics.

8.0 AUDITS & INSPECTIONS

Both Comstar Systems site supervisor and QEHS Manager will be organising HSE and quality audits on a weekly basis. Audit forms will follow the standard Comstar Systems audit checklist and will be recorded online. These audits will be made available for other stakeholders for review purposes. Any actions from the audits will be under the responsibility of the Site Supervisor and QEHS Manager.

9.0 MATERIALS CONTROL

Comstar Systems shall apply the Telstra material system process to document the receipt of goods and materials to be used on the site or within the works, such that the source and quality are traceable. This includes any supply of goods and materials by subcontractors.

10.0 REMEDIATION PROCEDURES

A pre and post dilapidation report will be produced to highlight any conditions during construction work that needs to be remediated post construction. This dilapidation report will be undertaken by the Comstar Systems Site Supervisor in conjunction with the nominated subcontractor onsite. All actions from the post dilapidation report will be the responsible of the Comstar Systems Site Supervisor and subcontractor to follow through. This may include ground remediation to original conditions and any weed control actions. Refer to Weed and Hygiene and Natural Values Section above and EPBC 2024/09816 Referral Decision Notice (Appendix A).

11.0 HIGH LEVEL CONSTRUCTION METHODOLOGY

The following table details the day-to-day construction and installation methodology for the new TasGRN Site at Mount King William. The methodology will be reviewed by the onsite Comstar Systems site representative prior to commencing work. Any changes made to the methodology needs to be approved by the onsite Comstar Systems site representative.

All personnel on site including visitors are to comply to Comstar Systems Safety Policy including but not restricted to specific onsite induction, SWMS / MOPs and risk assessment.

Day	Activities Description	Plant / Vehicle Required	Hold Point?
1 to 2	Confirm Existing users and operators of the adjoining Communications Facilities in the immediate vicinity have been notified of the construction period. Close walking track to site including the installation of signage as agreed with PWS Review the flight path from the proposed off-site staging area at to ensure any Wedge Tail Eagle nest locations are avoided during the breading season. Confirm current Eagle Nest Surveys are up to date and valid for the build dates. Material haulage (by road to staging area) will only occur during daylight hours to reduce the risk of native fauna roadkill. Mobilisation to site and commence site inductions. Site induction to include: • Briefing on environmental constraints including ○ Review the risk of rock topple and rockfall and conclusions and actions as stated in the Landslip Report, Intrax, Oct 2022. (Attached at Appendix A). ○ Location of Protected Vegetation / Pavement ○ Construction workers must utilise existing tracks as much as is practical	Helicopter (for access)	Yes – Comstar Supervisor and Ecologist to endorse Site set out and pre-dilapidation report. Works cannot continue if an active Tasmanian Wedge-tail Eagle nest is identified within 1000m of the site during the Eagle management constraint period Ecologist: • As described in the Pre-Clearance Survey and Den Discovery Protocol in the NVA for each site, application of this protocol (Sections A through D) will require approval to decommission dens under a permit to take products of wildlife, issued under the Tasmanian Nature Conservation Act 2002 (NCA) by the Department of Natural Resources and Environment Tasmania. The application of the Devil Survey protocols include:

	○ Concentrate all works and construction associated disturbance within the rock slab areas ○ Prescence of Eagle Nest within 1km of the site ○ Requirement for Unanticipated Discovery Plan in relation to Aboriginal Heritage ○ Implement the requirements of the Weed and Hygiene Management Plan, specifically 2.3 Hygiene Measures., wash down area to be set up at the offsite staging location - to be approved and inspected by on site ecologist. ○ Hygiene measures to be undertaken within on-site staging area as marked in Section 12 of this document. ○ As per the Tasmanian DPIPWE Washdown Guidelines, ledger filled in daily before entering and leaving. ○ Based on the works, 2 Spill Kits will be located on site, specifically, Safely Clean Up Oil & Fuel Spills: Portable truck spill kit - Safely Clean Up Oil & Fuel Spills: https://globalspill.com.au/product/spill-kit-oil-fuel-large-truck-95l/ ○ All operations involving hot works are suspended immediately once the Forest Fire Danger Index is calculated as equal to or greater than HIGH 20, or the relative humidity is equal to or less than 30%.		• A - Pre-clearance check for potential dens • B - Den monitoring assessment • C - Reporting and regulation • D - Unanticipated discoveries • Assessment under each protocol has hold points and is outlined in Tasmanian Devil Survey Guidelines and described in the NVA for each site

	○ Installation of the rock anchors is to be conducted in the presence of a geotechnical engineer to verify dolerite joint locations ○ Waste to be removed from site and dispose of either at a waste transfer site or approved location ○ Review and implement any conditions of the Planning Permit Commence site set-out with Ecologist*, Park Ranger* and Construction Partners. A construction site boundary will be marked onsite to limit incremental growth during works. This will occur as a pre-start activity in consultation with an ecologist Pre-dilapidation report to be completed on current site conditions. **TASMANIAN DEVIL AND QUOLLS** • Undertake, a pre-clearance survey of the project area (including a 50 m buffer) consistent with the Tasmanian Devil Survey Guidelines and Management Advice for Development Proposals • As described in the Pre-Clearance Survey and Den Discovery Protocol in the NVA for each site, application of this protocol (Sections A through D) will require approval to decommission dens under a permit to take products of wildlife, issued under the Tasmanian Nature Conservation Act 2002 (NCA) by the		

	Department of Natural Resources and Environment Tasmania. • The application of the Devil Survey protocols include: • A - Pre-clearance check for potential dens • B - Den monitoring assessment • C - Reporting and regulation • D - Unanticipated discoveries • Assessment under each protocol has hold points and is outlined in Tasmanian Devil Survey Guidelines and described in the NVA for each site Site set out to include • Layout of site civils as per T113011: ○ Existing helipad location ○ Tower & shelter foundations ○ Solar frame and battery box locations ○ Cable gantry route ○ Site earthing • Designated hot-works area • Designated material set down area Comstar will be guided by an Unanticipated Discovery Plan, during ground disturbing works, to aid in meeting the requirements under the Aboriginal Heritage Act 1975 (Tas)Act. Refer to T113011 S1 and S1-1 for site layout details.		
3 to 5	Delivery of key building materials and plant • Shelter	Helicopter (for access)	

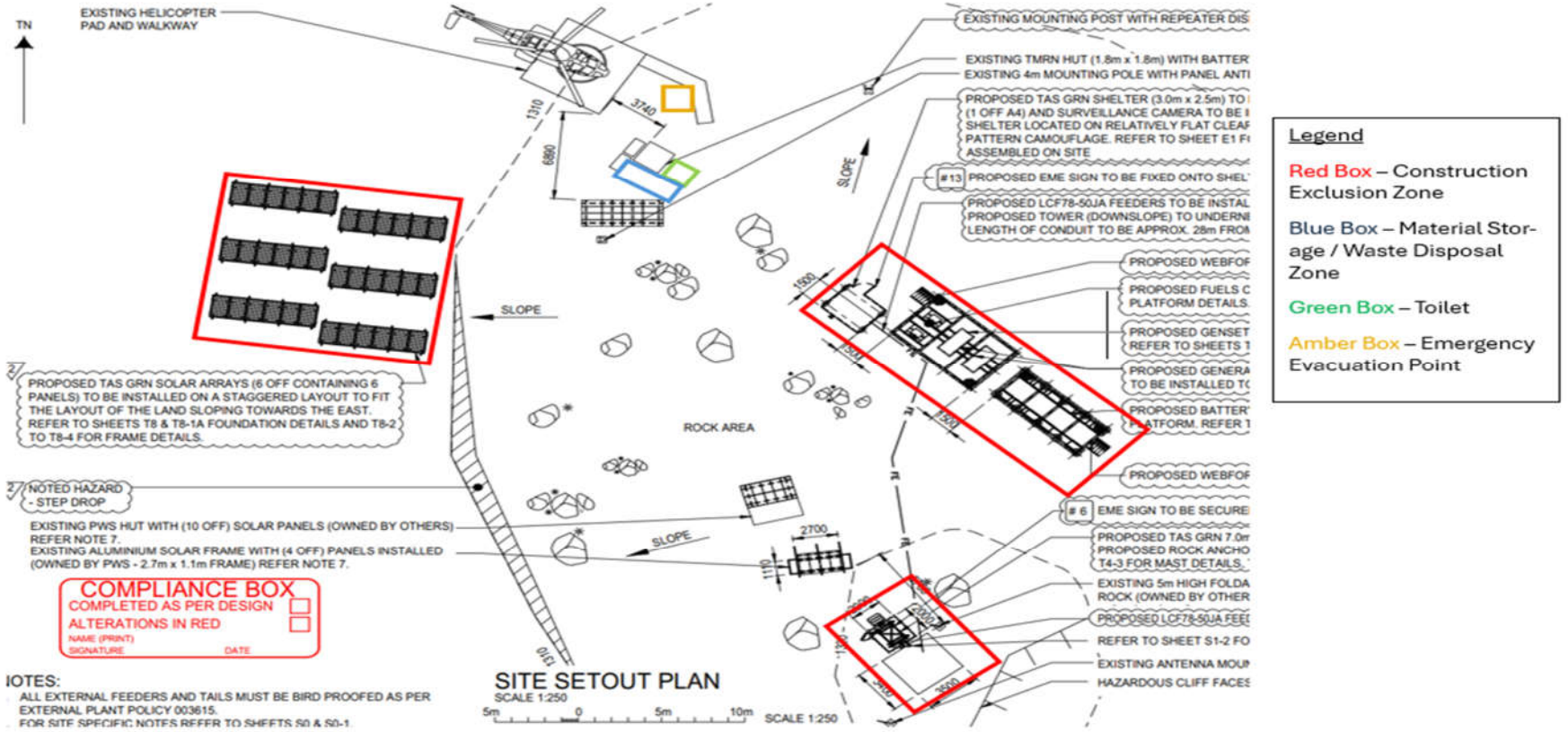
	• Solar • Foundation material and structure. Materials to be stored at the designated material set down area. Delivery of material may be staggered throughout the construction schedule depending on helicopter schedule.		
6 to 35	Commence site clearing (if required) and prep ground for rock anchors installation. Commence tower / shelter / solar frame rock anchor installation works as per drawings T113011 S3, S3-1, H1, H1-1, H1-1A, T2, T2-1, T4, T8-1, T8-1A, T8-3, T8-5, T8-5A, T8-6A, T8-7, T8-9 and T8-10. • Excavation • Rock breaking • Rock anchor borehole installation (Tower, Shelter, Genset platform, Battery bank platform and solar frame) • Place rock anchors and foundation steelwork (tower, shelter, genset platform, Battery bank platform and solar frame) • Boreholes for the drilled electrodes will be done concurrently Removal of spoil and disposal from excavation to be in accordance with Telstra requirements and the North Barker NVA report.	Helicopter (for access)	Yes – Steelwork and form work to be inspected by Comstar Supervisor
36	Rock anchors installation to be inspected and certified by engineers prior to concrete pour.	Helicopter (for access)	Yes – Foundation works and rock anchors to be inspected and sign off by Geotechnical engineer prior to concrete pouring

37 to 55	Concrete pour, forming and inspection. Construction Partners to install foundations as per T113011SO-1, S3, S3-1, H1, H1-1, H1-1A, T2, T2-1, T4, T8-1, T8-1A, T8-3, T8-5, T8-5A, T8-6A, T8-7, T8-9 and T8-10.	Helicopter / Concrete Pump	Yes – Comstar supervisor to observe concrete pour
56 to 75	Concrete to cure and commence removal of form work.	Helicopter (for access)	
76 to 85	Commence installation of shelter, genset platform, battery bank platform and new solar frame (and equipment) onto new foundation as per T113011 S1-1, S1-2, S3, S3-1, H1, H1-1, T8-1, T8-1A, T8-2, T8-3, T8-3A, T8-4, T8-5, T8-5A, T8-6, T8-6A, T8-7, T8-8, T8-9, T8-10, T8-11 and T8-12.	Helicopter (for access)	
86 to 100	Commence installation of new 7m mast including all antennas as per T113011 S1-1, S1-2, S3, S3-1, S3-2, T2, T2-1, T3, T3-1, T4, T4-1, T4-2, and T4-3.	Helicopter (for access)	Yes – Comstar Supervisor to survey tower height, verticality and antenna bearing
101 to 110	Continue rigging works including installation of feeders between new shelter and tower, termination of feeders at both ends and connection into new antennas as per T113011 S1-1, S1-2, S3, S3-1, T3 and T3-1.	Helicopter (for access)	
111 to 115	Commence shelter fit out including commissioning of SP22 and P25 equipment fit out as per T113011 E0, E1, E2, E4 and E5	Helicopter (for access)	
116 to 120	Site clean-up, conduct post-dilapidation report and As Built handover pack, demobilisation. Flagging material should be removed at the completion of works and a site environmental audit undertaken to ensure the avoidance measures were satisfactory Any temporary clearance areas within or on the edge of native vegetation should be targeted for revegetation post works, using propagules sourced from the local area and comprised of native species and also in compliance with the EPBC particular manner	Helicopter (for access)	Yes – Comstar Supervisor to ensure site is clean up and sign off post dilapidation report with Ecologist

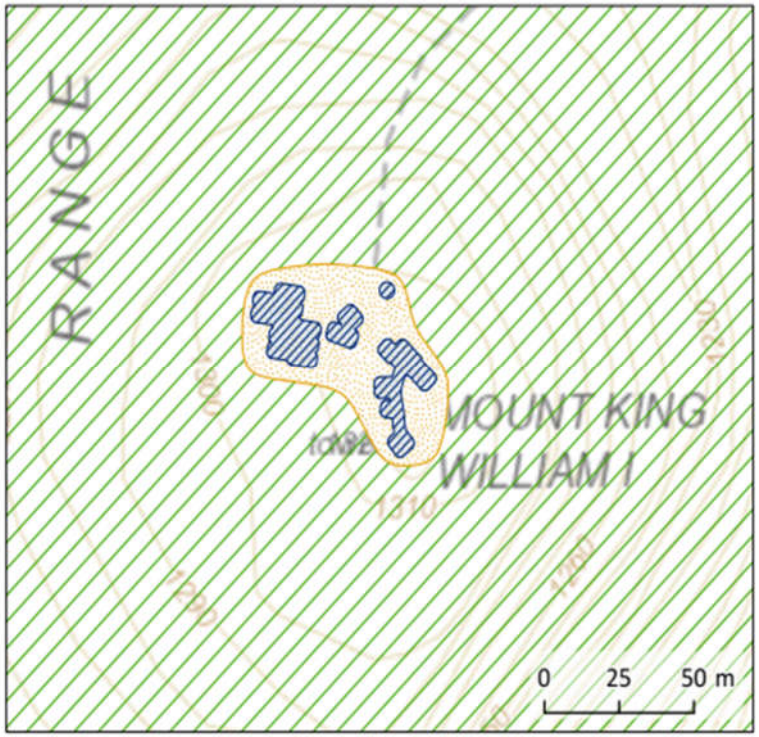
	Item 1d) *revegetate all areas not required to remain cleared after construction with local native vegetation;* A follow-up weed inspection of the project area is required to establish if treatment is warranted for the proliferation of weeds due to the project disturbance. This should be undertaken in spring or summer and at least 6 months after works are completed (but no longer than 2 years).		

12.0 STAGING AREA

Proposed high level staging area subject to changes on site. Any changes to proposed staging area will be endorsed and approved by the Comstar Systems Site Supervisor. Please note the proposed staging area below is for the initial establishment of the build phase. Comstar Systems Site Supervisor may make changes to the staging area (in consultation with the Project Manager) throughout the build phase to accommodate the various proposed installation.



Comstar Systems submits the following area disturbance map for reference for Mount King William.



13.0 NORTH BARKER RECOMMENDATIONS

As per North Barker NVA recommendations, the field investigation has established that the potential direct impact to natural values associated with the proposed TasGRN installation will be relatively minor regardless of the precise siting of infrastructure, which will provide the proponent with a degree of flexibility should factors such as micro-topography, geomorphology, and access influence the final design within the general area. Some mitigation is however recommended in relation to avoiding potential disturbance of eagle nesting activities.

With our recommendations followed, the proposal is not considered likely to result in significant impacts to any Matter of National Environmental Significance listed under the EPBCA. It is also expected that the requirements of relevant natural values legislation under the State and local schedules can be met.

Vegetation

a) Any temporary lay down areas must be carefully selected to avoid permanent impacts to native vegetation. This may include utilising sites that will be permanently cleared for temporary lay downs, setting platforms in rocky areas largely free of vegetation, or cutting back shrubs and laying materials on top. The latter method is the least desirable and
b) efforts should be made to adopt the former vegetation impact mitigation methods. Areas containing herbfields and cushion plants must be avoided.
c) Construction workers must utilise existing tracks as much as is practical, and in cases where this cannot be achieved, workers must 'fan out' to reduce the risk of new tracks forming. As above, the delicate herbfield and cushion plant vegetation must be avoided. Conforming to tracked areas also applies to any routine maintenance that is proposed in the future.
d) Any temporary clearance areas within or on the edge of native vegetation should be
e) targeted for revegetation post works, using propagules sourced from the local area and comprised of native species (with the corresponding species lists in Appendix B to be used as guidance).

Threatened Fauna

a) As no viable nests are present within an area potentially subject to disturbance (500 m or 1 km line of sight), the breeding season constraints do not apply for the 2022/23 season.
b) Ongoing helicopter use for maintenance and other needs will also require the same consideration of potential eagle nest locations and seasonal activity. Given it can be expected that this type of helicopter use will be required going forward within the eagle breeding season, it is advisable prior to such activities commencing to undertake a search for eagle nests within 1 km. Should nests be found, annual activity assessments (or a frequency proportional to the requirement to fly through the area in breeding season) are likely to be required, unless viewshed analyses indicate nests are not at risk of disturbance and can be avoided with flight paths. With respect to nest searches, it is noted that survey results are typically treated as valid for two years only; repeat surveys would thus be required even in the absence of nests in the first survey.
c) Nest activity assessments are undertaken annually from the air in October/November. Thus, constraints invariably apply each season from 1st July up until a point where a nest is concluded to be inactive for that season. If a nest is deemed inactive, the constraints will be lifted for the remainder of the breeding season (only to commence again 1st July

the following year). If a nest is found to be active, constraints will continue until the end of the season (either January or February depending on the season).

Tasmanian devil and quolls

a) Although it is unlikely that project area supports dens for Tasmanian devils, a pre-clearance survey of the project area (including a 50 m buffer) consistent with the Tasmanian Devil Survey Guidelines and Management Advice for Development Proposals11 must be conducted, adhering to the following protocol.
b) Pre-Clearance Survey and Den Discovery Protocol - Application of this protocol (sections A through D) will require approval to decommission dens under a permit to take products of wildlife, issued under the Tasmanian Nature Conservation Act 2002 (NCA) by the Department of Natural Resources and Environment Tasmania. The protocol can largely be undertaken by the civil contractors, with input on specific aspects of the den assessment and management by suitably qualified ecologists (the Ecologist). Some oversight and control of hold-points will be required by either regulators or the proponent and in that case linked to contract requirements for the contractor.
c) A- Pre-clearance check for potential dens - Approximately two weeks prior to any vegetation clearance and/or ground-breaking works, the contractor must undertake a walkover of the impact area (including a 50 m buffer) and systematically search for potential dens. Refer to North Barker NVA Section 3.4.2 for further detail.

Geomorphology

a) Glacial and Periglacial landforms are present on Mt King William I, however; neither suite of landforms are likely to be significantly impacted by the infrastructure works at the communications tower site.

14.0 WEED & HYGIENE MANAGEMENT

Weed Management

The primary objective of weed management on site will aim to minimise the risk of introduction of new weeds and prevent a breach of the containment principles of the Tasmanian Weed Management Act 1999 (WMA). Weed monitoring and treatments will be focussed on germinates establishing in areas of disturbance and along access tracks.

No weeds requiring treatment have been identified in the construction area and therefor there is no requirement for pre-construction weed control activities.

Construction activities have the potential to introduce weeds to the project area and tracks leading to the site. The footprint of the proposed tower, the areas around the tower site and access roads should be monitored for occurrences of weeds during and following works. If weeds are identified the following should occur:

a) Treat weeds as per Tasmanian guidelines provided through the Department of Natural Resources and Environment Tasmania (NRET) weed website, or by a qualified contractor or weed control operator; and;
b) If herbicide is to be used, only registered herbicides and those listed under an off-label permit issued by the Australian Pesticide and Veterinary Medicines Authority (APVMA) are legally allowed to be used in the control of weeds.

In general, control of weeds during and following works will minimise the risk of their spread and the establishment of new weed species.

Planned weed control activities should consider the following:

a) Soil containing weed seed must not be removed from site, unless approval is obtained from State government under the Tasmanian Weed Management Act 1999.
b) Weeds rooted in soil that will remain on site will require direct treatment on site.
c) The timing of the work needs to be considered.

Hygiene Measures

In conjunction with direct weed control, various site hygiene measures must be put in place as complementary methods of weed containment. The following prescriptions should be followed by all contractors on site during construction and within the follow-up treatments.

Throughout the construction site and access tracks contractors should be required to adhere to best practice guidelines:

a) Keeping it clean - A Tasmanian field hygiene manual to prevent the spread of freshwater pests and pathogens1
b) Weed and Disease Planning and Hygiene Guidelines - Preventing the spread of weeds and diseases in Tasmania2.

Works associated with clearance of vegetation and soil disturbance present a risk of introducing and spreading weeds.

Any machinery and vehicles entering the site have the potential to introduce new weeds and pathogens to the area. Consequently, a further critical measure to prevent weed spread is that of vehicle and machinery hygiene.

a) All vehicles and earthmoving machinery entering the works area must be clean and in particular free from clods of dirt and loose soil.
b) The preference is that all machinery and vehicles are cleaned prior to traveling to site. This would be at a depot or before leaving another job site. If this is not practical and machinery or vehicles are coming to site with potential contamination, then they should be washed on the way to site before entering the works area - Given that this site is not accessible by road, any machinery to be airdropped on site must be washed down prior to helicopter transport. A washdown station must be set up at the offsite staging area, and this site must be free of weeds. An ecologist should therefore be present for the selection of an offsite staging area to ensure its suitability.
c) All earthmoving plant (e.g. drills, excavators, loaders, etc.) must also be cleaned (washed down) before traveling to site or entering the site, and a wash-down checklist must be completed for each wash-down (checklists for various machinery are provided in Appendix A).
d) Following wash-down and dry washdown completion, the site supervisor/manager (or equivalent personnel) should inspect vehicles and machinery for cleanliness prior to traveling to site. If the subject meets the standards of cleanliness outlined in the guidelines, the supervisor can authorise its exit and record the wash-down in a ledger (Appendix B). Washdown records are only required for earthmoving plant including excavators, loaders, trucks, drills, etc.

e) Wash-downs must follow the procedures detailed in the Tasmanian Weed and Disease Planning and Hygiene Guidelines.
f) The minimum standard is that no clods of dirt or loose soil should be present after wash-down. If the vehicle or machinery does not meet the minimum standard of cleanliness, the supervisor must direct that it be further cleaned before entry.

Any fill materials to be imported to the site are only to be sourced from suppliers able to provide documentation as to the weeds present at the source. This documentation must be inspected by the party responsible for importing material. If material is found to be from a location containing weeds other than those species listed in Section 2, the material must be sourced from elsewhere or an ecologist consulted on the potential implications of new weed introductions.

Reporting and auditing

The implementation of the works is to be audited by an independent ecologist. Project supervisor and contractors to advise ecologist on completion of tasks.
a) An independent ecologist to inspect the works area, access tracks and dry washdown area in spring/summer 6 months (no longer than 12 months) post completion of civil works.
b) Contractor to brief ecologist on programme including wash down (provide copy of completed wash down ledger) and control works undertaken (provide copy of completed weed management records).

15.0 PARTICULAR MANNERS ASSOCIATED WITH EPBC REFERRAL DECISION ((EPBC 2024/09816)

Part A – Particular manners specific to the Action

The following measures must be taken to avoid significant impacts on:

World Heritage properties (sections 12 and 15A)
National Heritage places (sections 15B and 15C)
Listed threatened species and communities (sections 18 & 18A)

MANNERS TO PROTECT THE TASMANIAN WILDERNESS WORLD HERITAGE AREA LISTED THREATENED SPECIES

1) The person taking the Action must:
   a) not **clear**:
      i) more than 0.0160 ha of **native vegetation** inside the **Mt King William Action area**;
      ii) more than 0.0175 ha of **native vegetation** inside the **Mt Wedge Action area**;
   b) not undertake any **works**, other than haulage, outside of the **Action area**;
   c) undertake weed management in accordance with the **Weed and Disease Planning and Hygiene Guidelines** and the **Construction Management Plans**, including ensuring there is no weed incursion at the **Action area** until **completion of the action**.
   d) revegetate all areas not required to remain **cleared** after **construction** with local

native vegetation;

e) not exceed 120 **helicopter flight days** at each site during **construction**, and must:

i ascend and descend gradually to reduce 'blade slap' noise;
ii not fly within 1000 metres line-of-sight of **active Tasmanian Wedge-tail Eagle nests** during the **Eagle management constraint period**;
iii except where the safe conduct of the flight is jeopardised, adhere to **Tasmanian Parks and Wildlife Service prescribed flight paths** between the **offsite staging area** and the **Action area**;
iv except where the safe conduct of the flight is jeopardised or during landing and take-off at the **Action area**, maintain an altitude of at least 1,000 metres above ground level;

f) not undertake **construction** or **maintenance** within the **Eagle management constraint period** if an **active Tasmanian Wedge-tail Eagle nest** is identified within 1000 metres line of-site of the **Action area**;

g) avoid and reduce impacts to visual aesthetic and wilderness values, by:

i) **constructing** the towers in a lattice form at a maximum height of 7m;
ii) except for Electromagnetic energy signage, which must have a yellow background in accordance with **Australian Standard AS 1319-1994,** using black background on all signage, to reduce visibility at a distance;
iii) ensuring that signage is mounted at a maximum height of 2 metres from ground level;
iv) colour staining all visible concrete elements using either of the following methods:
A) add a dark coloured additive to general purpose concrete mix; or
B) apply a surface colour treatment;

h) ensure diesel and chemical management and storage is undertaken in line with **Australian Standard AS 1940:2017** and **Bunding and Spill Management Guidelines**, including:
i) bunded storage of any fuel tanks, ensuring the net capacity of the bunding is at least 110% of the capacity of the largest tank or 25% of the total capacity of all tanks within the bund, whichever is greater;
ii) ensuring appropriate spill kits are available and maintained until the **completion of the Action;** and

i) ensure all waste is removed from the site and transported outside of the **Action area** and outside of the **TWWHA** to relevant facilities authorised under the **Waste Management Regulations**, before the **completion of the Action.**

16.0 APPENDIX A

Title	Date	Attachment
North Barker NVA and WHMP	14/12/2022	Att 9 NVA_Mt KingWilliam_NBES D
North Barker Eagle Nest Survey	29/04/2024	TEL030_NBES_Eagle NestSearch_2024042
Intrax Landslip Risk Assessment	07/01/2022	Att 11 LANDSLIP REPORT Mt King Wil
Intrax Geotech Report	30/7/2021	Geotech 168748-GEO-Deskto
Telstra's Waster Management Documentation		Waste Management Proce; Telstra Waste Management Policy
Spill Management Documents		Telstra Managing Spills Procedure V2.; bunding_and_spill_ management_guide
Unanticipated Discovery Plan (From Aboriginal Heritage Tas), Fact Sheet, Stone Artefacts and Site Reporting Form.		Unanticipated Discovery Plan.pdf; AHT Fact Sheet - Stone Artefacts.PDF; AH Site Reporting form.PDF
Planning Permit and Endorsed Plans	TBC	TBC
PWS Approved RAA Level 3 with Commitments	TBC	TBC
Construction Activities will be contained to the mapped project and disturbance areas outlined in the EPBC referral mapping.		02_MKW_TasGRN_S taging Overview.pd

Documents attached at Appendix A: • 02_MKW_TasGRN Staging _Overview		
EPBC Act- Notification of referral decision – not controlled action if taken in a particular manner- Radiocommunications Facilities as part of the Tasmanian Government Radio Network Project- TasGRN (EPBC 2024/09816)	25/3/2025	 2024-09816 Referral-Decision Not