

Annex B

Environmental Mitigation Implementation Schedule

Annex B Environmental Mitigation Implementation Schedule

EIA Ref.	EM&A Ref	Environmental Protection Measures/ Mitigation Measures	Objectives of the Recommended Measure & Main Concerns to address	Location of the Measures	Who to implement the measure?	When to implement the measure? ⁽¹⁾				What requirements or standards for the measure to achieve?	Implementation Status and Remarks
						D	C	O/R	A		
<i>Air Quality – Construction Phase</i>											
4.8.1	AQ1	<u>Blasting</u> <ul style="list-style-type: none"> The area within 30m of the blasting area will be wetted prior to blasting. Blasting will not be carried out when the strong wind signal or tropical cyclone warning signal No. 3 or higher is hoisted, unless this is with the express prior permission of the Commissioner of Mines. loose material and stones in the Site will be removed prior to the blast operation During blasting, blast nets, screens and other protective covers will be used to prevent the projection of flying fragments and material resulting from blasting 	To minimise potential dust nuisance	Blasting area and 30m of blasting area	SENTX Contractor				✓	<i>Air Pollution Control (Construction Dust) Regulations</i>	Not applicable. Blasting is not required in the latest landfill design
4.8.1	AQ2	<u>Rock Drilling</u> <ul style="list-style-type: none"> Watering will be carried out at the rock drilling activities to avoid fugitive dust emissions. 	To minimise potential dust nuisance	Rock drilling area	SENTX Contractor				✓	<i>Air Pollution Control (Construction Dust) Regulations</i>	Not applicable. Rock drilling is not required in the latest landfill design

(1) D=Design; C=Construction; O/R=Operation/Restoration; A=Aftercare

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4.8.1	AQ3	<u>Site Access Road</u> <ul style="list-style-type: none"> The main haul road will be kept clear of dusty materials or sprayed with water. The main haul road will be paved with aggregate or gravel. Vehicle speed will be limited to 10kph. 	To minimise potential dust nuisance	Main haul road	SENTX Contractor	✓				<i>Air Pollution Control (Construction Dust) Regulations</i> <i>HKAQO and EIAO-TM Annex 4</i>	Reminder was given to Contractor
4.8.1	AQ4	<u>Stockpiling of Dusty Materials</u> <ul style="list-style-type: none"> Any stockpile of dusty materials will be covered entirely by impervious sheeting or placed in an area sheltered on the top and three sides or sprayed with water so as to ensure that the entire surface is wet. 	To minimise potential dust nuisance	All construction works area	SENTX Contractor	✓				<i>Air Pollution Control (Construction Dust) Regulations</i> <i>HKAQO and EIAO-TM Annex 4</i>	Implemented
4.8.1	AQ5	<u>Loading, unloading or transfer of dusty materials</u> <ul style="list-style-type: none"> All dusty materials will be sprayed with water immediately prior to any loading, unloading or transfer operation so as to maintain the dusty material wet. 	To minimise potential dust nuisance	All construction works area	SENTX Contractor	✓				<i>Air Pollution Control (Construction Dust) Regulations</i> <i>HKAQO and EIAO-TM Annex 4</i>	Implemented
4.8.1	AQ6	<u>Site Boundary and Entrance</u> <ul style="list-style-type: none"> Where a site boundary adjoins a road, street, service lane or other area accessible to the public, hoarding of height not less than 2.4m from 	To minimise potential dust nuisance	Site boundary and entrance	SENTX Contractor	✓				<i>Air Pollution Control (Construction Dust) Regulations</i> <i>HKAQO and EIAO-</i>	Not applicable

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		ground level will be provided along the entire length of that portion of the site boundary except for the site entrance or exit.								<i>TM Annex 4</i>	
4.8.1	AQ7	<u>Excavation Works</u> <ul style="list-style-type: none"> Working area of any excavation or earth moving operation will be sprayed with water immediately before, during and immediately after the operation so as to ensure that the entire surface is wet. 	To minimise potential dust nuisance	All construction works area	SENTX Contractor		✓		<i>Air Pollution Control (Construction Dust) Regulations</i> <i>HKAQO and EIAO-TM Annex 4</i>	Implemented	
4.8.1	AQ8	<u>Building Demolition</u> <ul style="list-style-type: none"> The area where the demolition works are planned to take place will be sprayed with water immediately prior to, during and immediately after the demolition activities. Any dusty materials remaining after a stockpile is removed will be wetted with water and cleared from the surface of roads or street. 	To minimise potential dust nuisance	All construction works area	SENTX Contractor		✓		<i>Air Pollution Control (Construction Dust) Regulations</i> <i>HKAQO and EIAO-TM Annex 4</i>	Not applicable	
4.8.1	AQ9	<u>Construction of the Superstructure of Building</u> <ul style="list-style-type: none"> Effective dust screens, sheeting or netting will be provided to enclose the scaffolding from the ground level up to the highest level of the scaffolding. 	To minimise potential dust nuisance	All construction works area	SENTX Contractor		✓		<i>Air Pollution Control (Construction Dust) Regulations</i> <i>HKAQO and EIAO-TM Annex 4</i>	Not applicable	

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4.8.1	AQ10	Should a stone crushing plant be needed on site, the control measures recommended in the <i>Best Practicable Means Requirement for Mineral Works (Stone Crushing Plants) BPM 11/1</i> should be implemented.	To minimise potential dust nuisance	Stone crushing plant/ construction phase	SENTX Contractor	✓				<i>Best Practicable Means Requirement for Mineral Works (Stone Crushing Plants) BPM 11/1</i>	Not applicable. Stone crushing plant is not required in the latest landfill design
4.8.1	AQ11	Good site practices such as regular maintenance and checking of the diesel powered mechanical equipment will be adopted to avoid any black smoke emissions and to minimize gaseous emissions.	To minimise potential dust nuisance	All construction works area	SENTX Contractor	✓				<i>HKAQO and ELAO-TM Annex 4</i>	Implemented
4.10.1	AQ12	Dust monitoring once every 6 days	Ensure the dust generated from the project meets the air quality requirement	At monitoring locations shown in <i>Figure 3.2a</i>	SENTX Contractor	✓				<i>HKAQO and ELAO-TM Annex 4</i>	Implemented
4.10.2	AQ41	Monitoring of ambient TSP once every 6 days	Ensure the dust emission from the project meets the dust requirement	At monitoring locations shown in <i>Figure 11.3a</i>	SENTX Contractor	✓	✓			<i>HKAQO and ELAO-TM Annex 4</i>	Implemented
4.10.2	AQ46	Monitoring of meteorological station, continuously	Collect site specific meteorological data	At meteorological station shown in <i>Figure 11.3a</i>	SENTX Contractor	✓	✓	✓	-		Implemented

Noise – Construction Phase

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5.7.1	N1	<p>Adopt good site practice listed below:</p> <ul style="list-style-type: none"> • Only well-maintained plant will be operated on-site and plant should be serviced regularly during the construction program; • Silencers or mufflers on construction equipment should be utilized and will be properly maintained during the construction program; • Mobile plant, if any, will be sited as far from NSRs as possible; • Machines and plant (such as trucks) that may be in intermittent use will be shut down between work periods or should be throttled down to a minimum; • Plant known to emit noise strongly in one direction will, wherever possible, be orientated so that the noise is directed away from the nearby NSRs; and • Material stockpiles and other structures will be effectively utilised, wherever practicable, in screening noise from on-site construction activities. 	To minimise potential construction noise nuisance.	All construction works area	SENTX Contractor				✓	<i>Noise Control Ordinance (NCO) and EIAO-TM Annex 5</i>	Implemented

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5.8	N2	Weekly noise monitoring	Ensure noise generated from the project meets the criteria	At monitoring locations shown in Figure 6.4a	SENTX Contractor		✓			Noise Control Ordinance (NCO) and EIAO-TM Annex 5	Implemented
Water Quality – Construction Phase											
6.8.1	WQ1	<u>Construction Runoff</u> <ul style="list-style-type: none"> Exposed soil areas will be minimised to reduce the contamination of runoff and erosion. 	To minimise potential water quality impacts arising from the construction works	All construction works area	SENTX Contractor		✓			ProPECC PN 1/94 EIAO-TM Annex 6	Deficiency of mitigation measures but rectified by the Contractor
6.8.1	WQ2	<ul style="list-style-type: none"> Perimeter channels will be constructed in advance of site formation works and earthworks and intercepting channels will be provided for example along the edge of excavation. 	To minimise potential water quality impacts arising from the construction works	All construction works area	SENTX Contractor	✓	✓			ProPECC PN 1/94 Water Pollution Control Ordinance (WPCO) EIAO-TM Annex 6	Deficiency of mitigation measures but rectified by the Contractor
6.8.1	WQ3	<ul style="list-style-type: none"> Silt removal facilities, channels and manholes will be maintained and the deposited silt and grit should be removed regularly to ensure they are functioning properly at all times. 	To minimise potential water quality impacts arising from the construction works	All construction works area	SENTX Contractor		✓			ProPECC PN 1/94 WPCO EIAO-TM Annex 6	Deficiency of mitigation measures but rectified by the Contractor
6.8.1	WQ4	<ul style="list-style-type: none"> Temporary covers such as tarpaulin will also be provided to minimise the generation of high SS runoff. 	To minimise potential water quality impacts arising from the construction works	All construction works area	SENTX Contractor		✓			ProPECC PN 1/94 WPCO	Implemented
6.8.1	WQ5	<ul style="list-style-type: none"> The surface runoff contained any oil 	To minimise potential	All	SENTX		✓			ProPECC PN 1/94	Not applicable

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		and grease will pass through the oil interceptors.	water quality impacts arising from the construction works	construction works area	Contractor					WPCO EIAO-TM Annex 6	
6.8.1	WQ6	<ul style="list-style-type: none"> All sewer and drains will be sealed to prevent building debris, soil etc from entering public sewers/drains before commencing any demolition works 	To minimise potential water quality impacts arising from the demolition works	Infrastructure area at existing SENT Landfill	SENTX Contractor		✓			ProPECC PN 1/94 WPCO EIAO-TM Annex 6	Not applicable
6.8.1	WQ7	<ul style="list-style-type: none"> During the excavation works for the twin drainage tunnels, the recycle water for cooling the cutter head of the TBM will be conveyed to the sedimentation tanks for treatment and most of the treated water will be reused, where applicable and as much as possible, in the boring operations. 	To minimise potential water quality impacts arising from the tunnel works	Tunnel boring sites	SENTX Contractor		✓			ProPECC PN 1/94 WPCO EIAO-TM Annex 6	Not applicable. Excavation of drainage tunnels is not required in the latest landfill design.
6.8.1	WQ8	<ul style="list-style-type: none"> The fuel and waste lubricant oil from the on-site maintenance of machinery and equipment will be collected by a licensed chemical waste collector. 	To minimise potential water quality impacts arising from improper handling of fuel and oil	SENTX Site	SENTX Contractor		✓			ProPECC PN 1/94 WPCO Waste Disposal Ordinance (WDO)	Not applicable
6.8.1	WQ9	<ul style="list-style-type: none"> Implementation of excavation schedules, lining and covering of excavated stockpiles 	To minimise contaminated stormwater run-off from the SENTX Site	All construction works	SENTX Contractor		✓			ProPECC PN 1/94 WPCO EIAO-TM Annex 6	Not applicable
6.13	WQ10	<ul style="list-style-type: none"> Monitoring of surface water quality will be conducted on a regular basis as stated in the EM&A Manual. 	To minimise potential water quality impacts on surface water arising from the construction works	SENTX Site	SENTX Contractor		✓			WPCO Water-TM	Implemented

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6.8.2	WQ11	<u>Sewage Effluents</u> <ul style="list-style-type: none"> Sufficient chemical toilets will be provided for the construction workforce. 	To minimise potential water quality impacts arising from the sewage effluents	SENTX Site	SENTX Contractor	✓			WPCO	Implemented	
6.8.2	WQ12	<ul style="list-style-type: none"> Untreated sewage will not be allowed to discharge into the surrounding water body. 	To minimise potential water quality impacts arising from the sewage effluents	SENTX Site	SENTX Contractor	✓			WPCO WDO	Deficiency of mitigation measures but rectified by the Contractor	
6.8.2	WQ13	<ul style="list-style-type: none"> A licensed waste collector will be employed to clean the chemical toilets on a regular basis. 	To minimise potential water quality impacts arising from the sewage effluents	SENTX Site	SENTX Contractor	✓			WPCO WDO	Implemented	
Waste Management – Construction Phase											
7.6.1	WM1	All the necessary waste disposal permits are obtained prior to the commencement of construction work.	To ensure compliance with relevant statutory requirements	Before construction works commence	SENTX Contractor	✓	✓		WDO	Implemented	
7.6.1	WM2	<u>Management of Waste Disposal</u> The construction contractor will open a billing account with the EPD. Every construction waste or public fill load to be transferred to the Government waste disposal facilities such as public fill reception facilities, sorting facilities, landfills will required a valid “chit” which contains the information of the account holder to facilitate waste	To ensure that adverse environmental impacts are prevented	SENTX Site	SENTX Contractor	✓			WDO <i>Waste Disposal (Charges for Disposal of Construction Waste) Regulation;</i> <i>Works Bureau Technical Circular No.31/2004; and</i>	Implemented	

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		<p>transaction recording and billing to the waste producer. A trip-ticket system will also be established to monitor the disposal of construction waste at the SENT Landfill and to control fly-tipping. The trip-ticket system will be included as one of the contractual requirements and implemented by the contractor.</p> <p>A recording system for the amount of waste generated, recycled and disposed of (including the disposal sites) will be established.</p>								<i>Annex 5 and Annex 6 of Appendix G of ETWBTC No. 19/2005)</i>	
7.6.1	WM3	<p><u>Measures for the Reduction of Construction Waste Generation</u></p> <p>Inert and non-inert construction waste will be segregated and stored in different containers or skips to facilitate reuse or recycling of the inert waste and proper disposal of the non-inert construction waste. Specific areas of the work site will be designated for such segregation and storage if immediate use is not practicable.</p>	To reduce construction waste generation	SENTX Site	SENTX Contractor			✓		WDO <i>EIAO-TM Annex 7</i>	Implemented
7.6.1	WM4	<p><u>Chemical Waste</u></p> <p>The construction contractor will register as a chemical waste producer with the EPD. Chemical waste will be handled in accordance with the <i>Code of Practice on the Packaging, Handling and Storage of</i></p>	To ensure proper handling of chemical waste	SENTX Site	SENTX Contractor			✓		WDO <i>Code of Practice on the Packaging, Handling and Storage of Chemical Wastes</i>	Deficiency of mitigation measures but rectified by the Contractor

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<i>Chemical Wastes.</i>											
7.6.1	WM5	<u>Sewage</u> An adequate number of portable toilets will be provided at the site to ensure that sewage from site staff is properly collected. The portable toilets will be desludged and maintained regularly by a specialist contractor.	To ensure proper handling of sewage	SENTX Site	SENTX Contractor	✓				WDO <i>EIAO-TM Annex 7</i>	Implemented
7.6.1 and SENTX latest design	WM6	<u>General Refuse</u> General refuse will be stored in enclosed bins separately from construction and chemical wastes. The general refuse will be delivered to a transfer station or other landfill, separately from construction and chemical wastes, on a daily basis to reduce odour, pest and litter impacts. Recycling bins will be provided at strategic locations to facilitate recovery of aluminium can and waste paper from the SENTX Site. Materials recovered will be sold for recycling.	To ensure proper handling of general refuse	SENTX Site	SENTX Contractor	✓				WDO <i>EIAO-TM Annex 7</i>	Deficiency of mitigation measures but rectified by the Contractor
7.6.1	WM7	<u>Staff Training</u> At the commencement of the construction works, training will be provided to workers on the concepts of site cleanliness and on appropriate waste management procedures, including	To ensure that adverse environmental impacts are prevented	SENTX Site	SENTX Contractor	✓					Implemented

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		waste reduction, reuse and recycling.									
7.8	WM8	<u>Environmental Monitoring & Audit Requirements</u> Weekly audits of the waste management practices will be carried out during the construction phase. The audits examine all aspects of waste management including waste generation, storage, recycling, transport and disposal.	To ensure that adverse environmental impacts are prevented	SENTX Site	SENTX Contractor		✓		WDO		Implemented
Landfill Gas Hazards - Design and Construction Phase											
8.6.2 and SENTX latest design	LFG1	Precautionary measures to be adopted by the contractors at the Project site and the adjacent development site within the landfill consultation zone are outlined in Paragraphs 8.3 to 8.49 of EPD's <i>Landfill Gas Hazard Assessment Guidance Notes (the Guidance Note)</i> . Those precautionary measures applicable to the SENTX will be confirmed in the detailed Qualitative Landfill Gas Hazard Assessment to be submitted by the contractor.	To protect workers from landfill gas risk	All construction works area	SENTX Contractor		✓		<i>Paragraphs 8.3 to 8.49 of EPD's Landfill Gas Hazards Assessment Guidance Note</i> <i>EIAO-TM Annex 7</i>		Implemented
8.6.2	LFG2	Monitoring will be undertaken when construction works are carried out in confined space within the consultation zone with reference to the monitoring requirements and procedures specified in Paragraphs 8.23 to 8.28 of EPD's <i>Guidance Note</i> will be followed.	To protect workers from landfill gas risk	Confined space within the construction works area	SENTX Contractor		✓				Not applicable

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		In the event of the trigger levels being exceeded, it is recommended that a person, such as the Safety Officer, is nominated, with deputies, to be responsible for dealing with any emergency which may occur due to landfill gas. In an emergency situation, the nominated person, or his deputies, shall have the necessary authority and shall ensure that the confined space is evacuated and the necessary works implemented for reducing the concentrations of gas. The appropriate organisations shall be contact.									
8.6.3	LFG4	Implementation of engineering measures according to Contract Specification requirements. These measures will include the placement of liner and installation of landfill gas management system to contain, manage and control landfill gas.	To protect workers from landfill gas risk	SENTX Site	SENTX Contractor	✓	✓	✓	✓	EIAO-TM Annex 7	Not applicable
8.6.3	LFG5	Engineering measures to significant engineering measures will be required in the design of the SENTX to protect the staff working in the infrastructure area. These measures include a combination of passive and active systems (examples are recommended in EPD's <i>Guidance Notes</i>). Landfill gas monitoring boreholes will be installed at the edge of the waste slope	To protect workers from landfill gas risk	Infrastructure Area	SENTX Contractor	✓	✓			EPD's <i>Landfill Gas Hazards Assessment Guidance Note</i> EIAO-TM Annex 7	Not applicable

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		between the waste and the new infrastructure area to monitor the migration of landfill gas, if any.									
Ecology – Construction Phase											
9.10.2	EC1	Measures to control construction runoff: <ul style="list-style-type: none"> Exposed soil areas will be minimised to reduce the contamination of runoff and erosion; To prevent stormwater runoff from washing across exposed soil surfaces, perimeter channels will be constructed in advance of site formation works and earthworks and intercepting channels will be provided for example along the edge of excavation; Silt removal facilities, channels and manholes will be maintained and the deposited silt and grit will be removed regularly to ensure they are functioning properly at all times; Temporary covers such as tarpaulin will also be provided to minimise the generation of high suspended solids runoff; 	To minimise potential water quality impacts affecting ecological resources	All construction works area	SENTX Contractor				✓	<i>EIAO-TM Annex 16</i> <i>ProPECC PN 1/94</i> <i>Water Pollution Control Ordinance (WPCO)</i> <i>EIAO-TM Annex 6</i>	Deficiency of mitigation measures but rectified by the Contractor Deficiency of mitigation measures but rectified by the Contractor Deficiency of mitigation measures but rectified by the Contractor Implemented

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		<ul style="list-style-type: none"> The surface runoff contained any oil and grease will pass through the oil interceptors; and, 								-	Not applicable
		<ul style="list-style-type: none"> Control measures, including implementation of excavation schedules, lining and covering of excavated stockpiles will be implemented to minimise contaminated stormwater run-off from the SENTX site. 								-	Not applicable
9.10.2 and SENTX latest design	EC2	<u>Good Construction Practice:</u> <ul style="list-style-type: none"> Fences along the boundary of the SENTX Site will be erected before the commencement of works to prevent vehicle movements, and encroachment of personnel, onto adjacent areas. The work site boundaries will be regularly checked to ensure that they are not breached and that damage does not occur to surrounding areas. 	To minimise potential ecological impacts arising from the Project	SENTX Site	SENTX Contractor				✓	<i>EIAO-TM Annex 16</i>	Implemented
9.12.1	EC9	<u>Environmental Monitoring & Audit Requirements</u> The implementation of the ecological mitigation measures should be checked as part of the environmental monitoring and audit procedures during the	To ensure that adverse ecological impacts are prevented	SENTX	SENTX Contractor	✓	✓	✓		<i>EIAO-TM Annex 16</i>	Implemented

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		construction period.									
<i>Landscape and Visual – Construction Phase</i>											
10.6.5	LV1	CM1 - The construction area and area allowed for the contractor's office, leachate treatment plant and laboratory areas will be minimised to a practical minimum, to avoid impacts on adjacent landscape.	To minimise the landscape and visual impacts	SENTX Site	SENTX Contractor	✓				<i>EIAO-TM Annex 18 and ETWBC 3/2006</i>	Not applicable
10.6.5	LV2	CM2 - Topsoil, where identified, will be stripped and stored for re-use in the construction of the soft landscape works, where practical. The Contract Specification will include storage and reuse of topsoil as appropriate.	To minimise the landscape and visual impacts	All construction works area	SENTX Contractor	✓				<i>EIAO-TM Annex 18</i>	Implemented
10.6.5	LV3	CM3 - All existing trees at the edges of the landfill will be carefully protected during construction. Detailed Tree Protection Specification will be provided in the Contract Specification. Under this Specification, the Contractor will be required to submit, for approval, a detailed working method statement for the protection of trees prior to undertaking any works adjacent to all retained trees, including trees in Contractor's works areas.	To minimise the landscape and visual impacts	Potential impacted area	SENTX Contractor	✓				<i>EIAO-TM Annex 18 and ETWBC 3/2006</i>	Implemented
10.6.5	LV4	CM4 - Trees unavoidably affected by the works will be transplanted, where necessary and practical. A detailed Tree	To minimise the landscape and visual impacts	Potential impacted area	SENTX Contractor	✓	✓			<i>EIAO-TM Annex 18 and ETWBC 3/2006</i>	Not applicable

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		Transplanting Specification will be provided in the Contract Specification, if applicable. Sufficient time for necessary tree root and crown preparation periods will be allowed in the project programme.									
10.6.5 and SENTX latest design	LV5	CM5 - Within 3 months of taking possession of the SENTX Site, the Contractor will plant advance screen planting of native species at Light Standard size at 1.5m centres along the High Junk Peak Trail so as to screen views of the Works from the trail. Tree planting locations will be agreed with AFCD. Works will be completed within 9 months of taking possession of the SENTX Site.	To minimise the landscape and visual impacts	At High Junk Peak Hiking Trail	SENTX Contractor	✓				<i>EIAO-TM Annex 18</i>	Implemented
10.6.5	LV6	CM6 - The Contractor's office, leachate treatment plant and laboratory will be given an aesthetic treatment in earth tones to reduce their visual impact and albedo and blend them into the surrounding landscape.	To minimise the landscape and visual impacts	Infrastructure area	SENTX Contractor	✓	✓			<i>EIAO-TM Annex 18</i>	Not applicable
10.6.5	LV7	CM7 - The Contractor's office, leachate treatment plant and laboratory will be surrounded by a minimum of 5m wide and 0.75m high earth bund on the west and south sides planted with a dense screen of tree and shrub vegetation. Additional tree planting will be provided in unused spaces with thin infrastructure	To minimise the landscape and visual impacts	Infrastructure area	SENTX Contractor	✓	✓			<i>EIAO-TM Annex 18 and ETWBC 7/2002</i>	Not applicable

EIA Ref.	EM&A Ref	Environmental Protection Measures/ Mitigation Measures	Objectives of the Recommended Measure & Main Concerns to address	Location of the Measures	Who to implement the measure?	When to implement the measure? ⁽¹⁾				What requirements or standards for the measure to achieve?	Implementation Status and Remarks
						D	C	O/R	A		
		site, along access roads and in and around car parks. This will be supplemented with shrub planting, where appropriate.									
10.6.5	LV8	CM8 - Planting trials will be carried out in an on-site nursery prior to implementation of the first phase of restoration to establish the best planting matrix and management intensity of the recommended plant materials for the restoration.	To minimise the landscape and visual impacts	SENTX Site	SENTX Contractor		✓			<i>EIAO-TM Annex 18</i>	Not applicable
11.4.1 and SENTX latest design	LV9	During the preparation of the detailed landscape design plan, the design submission will be audited against the recommendation proposed in the <i>ER Report</i> by the Registered Landscape Architect from the ET.	To ensure the implementation of mitigation measures proposed in this EIA Report	SENTX Site	SENTX Contractor/E T		✓	✓		<i>EIAO-TM Annex 18</i>	Implemented