Busways Environmental Management Plan 2023-2028

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Busways acknowledges the Traditional Owners and Custodians of the land on which we work and travel through each day. We recognise their continuing connection to land, waters and community and pay our respects to Elders past and present.

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1 Introduction

Busways has a deep commitment to implementing sustainable practices and initiatives that preserve and protect the environment for the wellbeing of current and future generations.

Operating more than 72 million kilometres annually with a heavy vehicle fleet largely dependent on diesel, Busways acknowledges the significant environmental impact we have in the delivery of large-scale transport services. The transport sector is still largely dependent on fossil fuels and is Australia's second highest emitter of carbon emissions.

We recognise however that public transport also plays a critical role in providing essential transportation services, and that well designed and managed bus services can reduce the use of private vehicles and associated GHG emissions.

Through the implementation of previous Environmental Management Plans, we have improved sustainable operations through progressing the implementation of battery electric bus fleet in support of State Government net zero transition policy and plans. Busways has previously installed 100 kW solar power systems at our Penrith and Kincumber depots in NSW and continues to consider similar opportunities for other depots.

This Environmental Management Plan (EMP) and our certification to ISO14001 Environmental Management Systems, demonstrates to our employees, customers, partners and the community, Busways' commitment to environmental stewardship and to the continual improvement of sustainable business practices.

1.1 Purpose

Globally, the United Nations Department of Economic and Social Affairs recognises the importance of transport to sustainability through the Sustainable Development Goals (SDGs). Specifically Target 11.2 for SDG 11 – Sustainable Cities and Communities, which includes providing access to safe, affordable, accessible and sustainable transport systems for all, and notably by expanding public transport, should be achieved by 2030. Other SDGs with direct links to transport include: SDG 7 – Affordable and Clean Energy, SDG 8 – Decent Work and Economic Growth, SDG 9 – Industry, Innovation and Infrastructure, and SDG 10 – Reduced Inequalities.

Australia, as a developed nation with a vast and diverse landscape, also recognises the potential adverse effects of transportation on air quality, biodiversity, and greenhouse gas emissions. Australian Federal and State governments have established legislation and regulations to ensure responsible environmental management (including as mentioned in Section 1.3).

This Plan outlines Busways' approach to environmental management. The document sets out our strategies, policies and environmental initiatives, focus areas and actions aligned to the requirements of our ISO 14001 Environmental Management System certification.

1.2 Scope

This Plan applies to Busways' business operations associated with the service design and delivery of passenger services operated by Busways on behalf of the NSW and SA Governments for the following Contracts:

- Outer South Contract 18C205 – Adelaide South Australia
- Greater Sydney Bus Contract 1 – Western Sydney
- Greater Sydney Bus Contract 7 – North Shore and West
- Outer Metropolitan Bus Contract 6 – Central Coast
- NSW Rural and Regional Contracts held by Busways

The primary focus is on aspects under Busways' control, such as workforce behaviour, fleet maintenance, property management, network planning and scheduling, procurement and purchasing, waste and end-of-life management, quality assurance and customer-related processes across our National Support Office and all Busways depots. It also considers aspects that Busways does not control but can influence through proactive partnership, such as fleet design and procurement and network technology systems.

1.3 Legislation and Contractual Requirements

The Environmental Management Plan meets the contractual, legislative and regulatory requirements of a bus operator.

This Plan ensures that we meet our obligations under the following Acts and Regulations:

Federal and National:

- Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)
- Aboriginal and Torres Strait Islander Heritage Protection Act 1984
- National Environment Protection (Diesel Vehicle Emissions) Measure
- National Environment Protection (Air Toxics) Measure
- National Environment Protection (Ambient Air Quality) Measure
- National Environment Protection (Assessment of Site Contamination) Measure
- National Greenhouse and Energy Reporting Act 2007
- National Greenhouse and Energy Reporting Regulations 2008
- National Greenhouse and Energy Reporting (Measurement) Determination 2008
- Corporations Act 2001 – Treasury Laws Amendment (Financial Market Infrastructure and Other Measures) Act 2024 – AASB S2 climate-related disclosure requirements

State:

- National Environment Protection Council (South Australia) Act 1995
- Environment Protection Act 1993, SA

- Environment Protection Regulations 2009, SA
- Climate Change and Greenhouse Emissions Reduction Act 2007, SA
- Heritage Places Act 1993, SA
- Heritage Places Regulations 2020, SA
- Planning, Development and Infrastructure Act 2016, SA
- Planning, Development and Infrastructure (General) Regulations 2017, SA
- Aboriginal Heritage Act 1988, SA
- National Environment Protection Council (New South Wales) Act 1995
- Protection of the Environment Operations Act 1997, NSW
- Protection of the Environment Operations (General) Regulation 2022, NSW
- Protection of the Environment Operations (Clean Air) Regulation 2021, NSW
- Protection of the Environment Operations (Noise Control) Regulation 2017, NSW
- Sydney Water Act 1994, NSW
- Environmental Planning and Assessment Act 1979 No 203, NSW
- Environmental Planning and Assessment Regulation 2021, NSW
- Biodiversity Conservation Act 2016, NSW
- National Parks and Wildlife Act 1974 No 80, NSW
- The Climate Change (Net Zero Future) Act 2023, NSW

This Plan has been built on a review of:

- Applicable Bus Service Contracts and Schedules
- ISO 14001:2015 Environmental Management System – Specification with Guidance for Use
- The SA Government Climate Change Action Plan 2021 – 2025, which includes seven focus areas: Clean energy transformation, Climate smart economy, Climate smart agriculture, landscapes and habitats, Low emissions transport, Climate smart built and urban environments, Resilient communities, Government leading by example
- The South Australian Department for Infrastructure and Transport (SA DIT) Sustainability Manual, which includes five sustainability focus areas: Greenhouse gas emissions reduction, Circular economy, Use of non-potable water, Climate change resilience
- The Transport for New South Wales (TfNSW) Transport Environment and Sustainability Policy

- The TfNSW Transport Sustainability Plan, which includes eight sustainability focus areas: Respond to climate change, Protect and enhance biodiversity, Improve environmental outcomes, Procure responsibly, Partner with communities, Respect culture and heritage, Align spend and impact, Empower customers to make sustainable choices
- Global best practice, including UN Sustainable Development Goals, research and reports from organisations such as International Association of Public Transport (UITP) and the Climate Council

1.4 External Environmental Assurance

In line with Busways' commitment to conduct effective operations throughout our network in all states and regions, while carefully managing our environmental impacts; we have achieved and will maintain over the course of the applicable contract period, the following external compliance measures that guide our activities.

Table 1 Environmental compliance

Compliance area	Standard	Audit authority
Environmental management assurance	ISO 14001	Global Compliance Certification
Clean Fleet accreditation[1]	TfNSW	TfNSW

Throughout the life of applicable contracts Busways will also comply with requirements associated with the following licences or activities:

- Notification of Dangerous Goods
- Trade Waste Agreements
- Australian Refrigeration Council Refrigerant trading licence
- Installation of monitoring wells
- National Greenhouse and Energy Reporting Scheme
- Land Contamination reports for sites where relevant
- Asbestos registers and information

[1] A contractual requirement within Busways existing NSW operations, Busways maintenance and fleet management programs are adopted across all service operations and regions to ensure that the fleet is maintained to the same standard of compliance as the Clean Fleet program.

1.5 Environmental Management System

Busways' maintains an Environmental Management System (EMS) certified to ISO 14001:2015 Environmental Management Systems. Global Compliance Certification Pty Limited (GCC), a JAS-ANZ accredited certification body, recertifies our EMS on a three-year audit cycle, the most recent being in March and April 2025.

Table 2 provides a summary of Busways' documents and activities that align to EMS requirements.

Table 2 Mapping Busway's system to ISO 14001 requirements

ISO 14001 Requirement	Busways Processes / Activities
Leadership (Element 5)	• Busways Environmental Management Policy • Integrated Management System Policy • ESG Steering Committee (performs Management Review function) • Management commitment, including Leadership Team meeting agenda item for environmental events, actions and outcomes
Planning (Element 6)	• Environmental Management Plan • Annually set and review objectives, focus areas and targets • Aspects, impacts and risk register
Support (Element 7)	• Documentation and communication of the scope, expectations and responsibilities for staff relating to the Environmental Management System • Training, education and awareness campaigns for all staff relating to the environmental management system • Promote environmental awareness periodically through communication platforms and events • Public display on website of Environmental Management Plan
Operation (Element 8)	• Processes and documentation required for environmentally responsible maintenance and fulfillment of contract requirements • Effective supplier management that includes review of suppliers' operations, documentation, and environmental records • Managing all emergency incidents and responses in line with Busways' Emergency Management Plan
Performance evaluation (Element 9)	• Annual review of documents and policies • Monitoring of environmental activities, performance and consumption • Annual National Greenhouse and Energy Reporting • Annual AASB S2 reporting (climate related financial disclosures) • Internal and external audits, including 3-year cycle for ISO re-certification • Compliance evaluations of environmental licences and permits.
Improvement (Element 10)	• EMP annual review and update • Corrective and improvement actions based on audit findings and consumption monitoring • Audit results, action plans and non-conformance procedures and reporting

2 Plan Governance

2.1 Relationship to Other Plans

Busways has a robust set of management plans, procedures, protocols and systems that sit within the Busways Management System (BMS), shown in Figure 1. The EMP will be governed under the BMS as an ISO Plan and a Contract Plan.

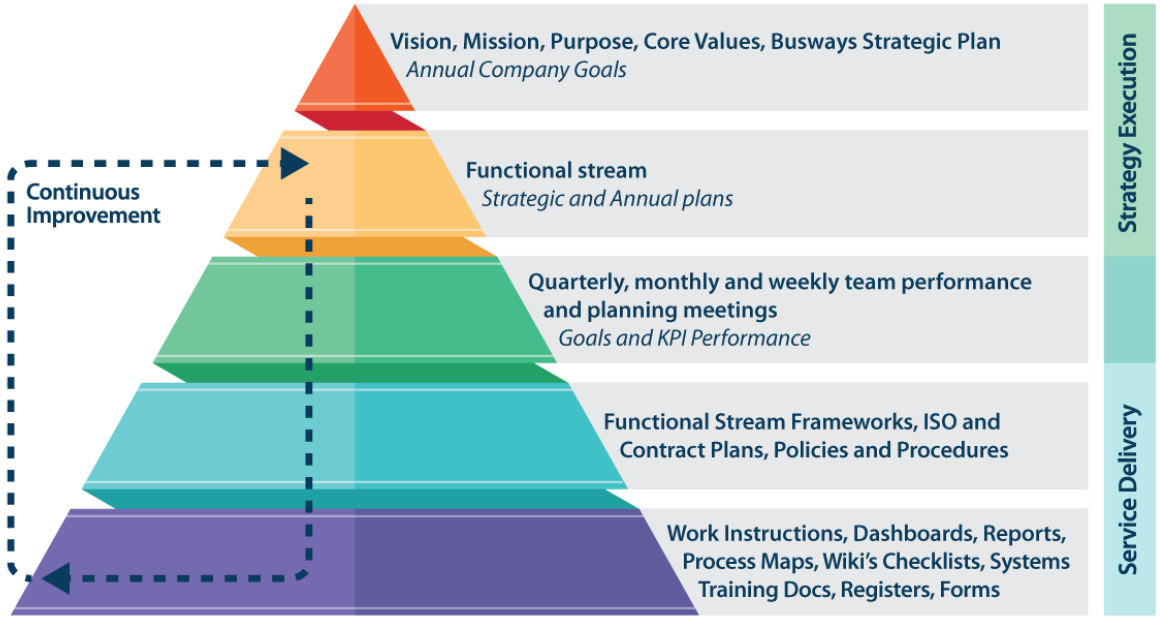


Figure 1 Busways Management System (BMS)

Busways seeks to apply the principles of the UN Sustainable Development Goals across all areas of business operations with appropriate consideration of equal opportunity, diversity, Aboriginal participation, community engagement and consultation, commercial relationships and environmental management practices.

The EMP sits in the suite of plans that manage Busways' corporate responsibility, specifically:

- Sustainability Plans
- Diversity and Inclusion Plans
- Small and Medium Enterprise and Regional Procurement Plans
- Aboriginal Participation Plans
- Disability Engagement Plans
- Busways Accessible Transport Action Plan
- Busways Reconciliation Action Plans

3 Leadership

3.1 Environmental Policy

Busways Environmental Management Policy is implemented across all levels of the business, accessible to all employees through the Busways Portal and all worksites. Regular awareness communications are published on Busways' employee engagement mobile app to maintain an environmentally conscious organisational culture.

Our Environmental Management Policy commits us to protect the communities we serve, ensuring our operations minimise the risk or occurrence of negative environmental impacts or pollution incidents by:

Meeting, or exceeding, the relevant standards, regulations, and legislation

- Establishing positive relationships with community, stakeholders, suppliers, and partners to enable sustainable business practices across all interactions
- Implementing initiatives and programs designed to deliver continual improvement

3.2 Leadership Commitment

Busways' Chief Executive Officer is ultimately responsible for strategic goal setting and resourcing the business to meet its targets and commitments. The Chief Executive Officer has the final authority relating to the delivery of bus services including operations, maintenance, administration and resourcing.

Busways' Director of Corporate Affairs and Customer Experience is responsible for Busways' environmental social governance (ESG) strategy and the suite of plans that guide the implementation of systems, programs and activities to meet our obligations and deliver on our commitments.

Busways' Sustainability function is responsible for the development of this plan and ensuring its effective implementation within the business. The Sustainability team facilitates a cross-functional internal committee with representatives of key business functions responsible for the actions and commitments in the plan, and those in related business and contract plans. Reporting to the Director of Corporate Affairs and Customer Experience, the Sustainability team is responsible for educating the workforce on environmental responsibility, and for internal and contract reporting activities.

Busways' Directors' of Service Delivery and Director, Assets / Director, Safety, together are responsible for ensuring the service delivery, assets, property and purchasing functions of the business comply with Busways' commitment to sustainable procurement and environmental protection. These Leadership Team representatives are responsible for ensuring environmental management processes are maintained and reviewed in accordance with business and legislative requirements.

3.3 Organisational roles and responsibilities

Employees at every level play a role in responsible environmental management. All job descriptions include expectations relating to our integrated management systems and ISO certifications. These expectations are reviewed with all new employees during induction training along with additional information on reporting requirements and primary points of contact.

4 Planning

Environmental management documentation, policies and procedures are developed, reviewed and maintained to ensure the effective implementation and continual improvement of the Environmental Management System. Ongoing review and development of documentation ensures alignment to our environmental objectives and broader certification requirements.

4.1 Environmental Aspects and Impacts

Busways' master risk register identifies environmental aspects and potential impacts that may result from business operations. Each risk is assessed and control measures specified to mitigate or, manage the impact.

The register, controls and risk assessments are scheduled for review based on severity, with higher rated risks scheduled for more frequent review than lower rated risks. In addition, environmental risks may be reviewed outside of this schedule due to specific projects, asset development, construction activities, or due to other significant compliance related or operational changes. New or additional control measures are considered and implemented, where appropriate, as part of our ongoing continual improvement activities to minimise environmental impacts.

4.2 Compliance with the Contract

In addition to compliance with legislation and policy, Busways also has contract requirements relating to environmental management that are served through the implementation of this EMP. This includes environmental requirements identified in:

- SA – Outer South Contract 18C205, Schedule 3 General Specification and Schedule 8 Reporting Requirements
- NSW – Greater Sydney Bus Contracts 1 and 7, Schedule 5 Governance and Reporting and Schedule 6 Assets
- NSW – Outer Metropolitan Bus Service Contract 6, Schedule 5 Governance and Reporting and Schedule 6 Assets

Our review process will enable us to further understand where we need to grow and develop, while demonstrating authenticity in our commitments, actions and accountability.

The operation of bus services involves the use of materials that, in the event of an accident or improper management, have the potential to become environmental contaminants. Busways' procedures and training activities ensure both the proper management of potential contaminants and the effective containment and treatment of any environmental incident. The acquisition, storage and disposal of dangerous goods and hazardous chemicals is managed in accordance with their classification and legislative requirements. Environmental incidents will be managed in

accordance with Busways' EMS and in full compliance with regulation and our contracts as specified above.

4.3 Environmental Objectives

Busways' environmental management objectives are to:

1. Minimise the environmental impact of our business through effective management and efficient use of resources.
2. Increase participation and improve accountability of all employees through raising environmental awareness throughout the organisation.
3. Demonstrate environmental responsibility to stakeholders and the public through independent certification and performance reporting.
4. Improve environmental benefits of our initiatives and programs through customer, supplier and contractor engagement.

4.4 Key Focus Areas

Our goals will be achieved through this Plan's five key focus areas and their objectives, strategies and targets:

1. **Energy, Fuel and Water:** Minimise environmental impact through responsible use of energy, fuel and water.
2. **Waste Management:** Effectively manage waste to ensure operations have minimal impact on the environment.
3. **Procurement and Materials:** Make environmentally conscious decisions through procurement processes, materials selection and recycling practices.
4. **Certification, Compliance and Reporting:** Maintain ongoing compliance and reporting requirements.
5. **Continual Improvement:** Investigate and implement new initiatives to continually improve environmental management.

In section 9, the Busways Environmental Action Plan details these focus areas and the actions and measures to achieve them throughout the contract.

5 Support

5.1 Employee Competence and Training

Roles with environmental management responsibilities have related relevant training content built into their onboarding, induction and refresher training activities. These activities outline environmental and sustainability policies and procedures and expectations for each employee in relation to the unique requirements of their role.

Further environmental awareness training that is context specific and risk-based is under development for Busways' online learning management system, CAMPUS.

Consultation and engagement with employees regarding environmental matters provides the opportunity for corrective action and continual improvement as relevant to Busways' operations. We do this through regular face-to-face mechanisms and other channels such as:

- Employment and site inductions
- Training activities
- Toolbox talks and quarterly service delivery and assets team meetings
- Driver consultative and WHS committee meetings
- Campaigns and events

5.2 Communications

5.2.1 Workforce Communications

News about EMP initiatives and activities, is communicated to employees via internal communication channels including by employee communication app and worksite physical and digital noticeboards. Busways' Sustainability Team is responsible for liaising with key communicators in the company − particularly the marketing, human resources and service delivery departments – to produce communications and awareness-building campaigns and events to influence behaviours required to achieve the goals of our Plan.

5.2.2 Customer Communications

Busways' EMP is published on the Busways website. In addition to informing the community about the responsible environmental management of their local bus services, publication of the Plan holds Busways accountable to the service standards and commitments we have made. The customer version of this Plan describes Busways' commitments, responsibilities and goals in a simple, customer-focused format, accessible on Busways' website.

News about EMP initiatives and outcomes is shared as appropriate on our customer-facing channels, including website, Facebook and LinkedIn, and media. In the case of a serious environmental incident threatening material harm, Busways would report and provide information to relevant external bodies, stakeholders and communities, meeting all regulatory requirements.

6 Performance Evaluation

6.1 Environmental Reporting

Busways is registered through the Australian Government Clean Energy Regulator for the National Greenhouse and Energy Reporting (NGER) scheme, which provides a national framework for reporting greenhouse emissions, energy production and consumption on an annual basis.

The objectives of the NGER scheme are to:

- Inform government policy
- Inform the Australian public
- Help meet Australia's international reporting obligations
- Assist Commonwealth, state and territory government programmes and activities, and
- Avoid duplication of similar reporting requirements in the states and territories

Accurate records of energy use will be kept and reports will be submitted annually in accordance with the NGER scheme.

6.2 Auditing Program

Auditing is designed to verify the effectiveness of the EMS and compliance to ISO certification standards. Busways' systems and processes are applied nationally which enables a consistent audit approach and broad benefits from lessons learned and continuous improvement.

Busways' audit process consists of:

1. Preparing and managing the audit program
2. Pre-audit activity management
3. Audit execution
4. Action audit findings
5. Follow-up of open audit findings.

Busways' Compliance & Business Systems Manager, in consultation with the Head of Human Resources, prepares a three-year National Audit Plan and will liaise with stakeholders in the fourth quarter of each year to clarify the audit program for the next 12 months. The National Audit Plan encompasses all Busways sites over the three-year cycle and includes Environment, WHS, Quality Standards and validation of internal processes. In addition, to maintain ISO certification, Busways must pass the annual external surveillance ISO audit and triennial recertification audit undertaken by the certification body.

The audit program is based on a risk assessment of facilities, management system elements and suppliers. It evaluates performance and procedures against specific requirements and any applicable laws and standards that need to be audited in a three-year cycle, thereby ensuring that the entire management system is reviewed in a three-year period. Risk reviews will be recorded in the Audit Finding Register and the national audit program will be released each January.

The audit report is initially distributed to the Leadership Team member in charge of the area audited for review. It may also be forwarded, where appropriate, to other relevant internal or external stakeholders. The Leadership Team member in charge of the audited area reviews the audit findings and facilitates root cause evaluation. All corrective and preventive actions are logged and managed to completion.

The findings are risk-assessed to ensure that safety implications are considered. The risk rating of the finding is populated in the Audit Finding Register.

Regular reviews of the audit findings, and any follow-up actions, are conducted between the auditee and the auditor, enabling an evidence-based close-out of the audit findings. Audit results are tabled for internal and external stakeholders after validation by Busways Leadership Team.

6.3 Management Review

Management reviews of the EMS assess opportunities for improvement and determine the need for any changes, including Policy and objectives. The frequency of management reviews is specified within the ESG Steering Committee Charter.

7 Environmental Management Action Plan

Focus Area 1 - Energy, fuel and water use			
No.	**Tactics and Actions**	**Timing**	**Indicators**
1.1	Analyse and monitor all energy consumption across worksites: • Review of energy consumption across all sites • Investigate increased energy consumption • Establish benchmark for current energy consumption.	Monthly	• Monthly energy consumption, including grid and solar, is recorded in internal records system for all worksites • % reduction in energy consumption through use of solar power where applicable • % reduction in energy consumption annually • Volume of energy consumed through depot operations.
1.2	Analyse and monitor all water consumption across worksites: • Review of water consumption across all worksites • Investigate increased water consumption to determine cause and rectify potential leaks/waste.	Monthly	• Monthly water consumption, including mains and grey water, is recorded in internal records system for all worksites • All water leaks/wastage identified and resolved within 48 hours • % reduction in water consumption annually (relative to scale of operations).
1.3	Reduce town water consumption through greywater: • Install recycled water systems for bus washes and depot activities wherever feasible	Opportunity-based	• Number of depots using recycled water for external bus wash • Capture data measuring current water consumption to benchmark mains and recycled water usage • Reduced mains water consumption through recycling systems.
1.4	Reduce energy consumption through efficient lighting: • Install sensor and LED lighting systems across all worksites to reduce energy usage wherever feasible • Comparative analysis of reduced energy consumption through installation of LED lighting	Opportunity-based	• Number of sites that have LED lighting/sensor lighting installed • % reduction in energy consumption

Focus Area 1 - Energy, fuel and water use			
1.5	Monitor usage of diesel fuel and maintain tanks to minimise impacts and environmental hazards: – Annual inspection of fuel tanks, bowsers, fuel lines and pipes by a certified contractor – Monthly visual inspection of bowsers and fuel tanks for rust, leaks, physical damage, compliance stickers – Conduct daily tank dip to record tank capacity/usage – Compare daily tank dip readings to fuel usage reports to verify any fuel loss or leaks – Monthly testing of diesel tanks for water or contamination – Immediate reporting of any leaks, fuel loss or damage during inspection for repair – Maintain relevant licences for diesel fuel tanks over 100,000 litre capacity	Ongoing	• Volume of fuel consumed through bus and car fleet.
1.6	Reduce non-renewable energy supply through solar: • Install solar panels at feasible sites • Conduct trend analysis of zero emissions energy production through solar panels.	Opportunity-based	• Number of sites in the contract area with solar panels installed • Decrease in energy consumption through use of solar power • Minimal grid energy consumption during daylight hours at depots where solar arrays are installed
1.7	Improve energy efficiency of air conditioning systems: • Install cut-off timers within air-conditioning systems to reduce automatic running and energy consumption • Periodic audit of automated shut-off systems.	All sites, periodic checks	• Number timers and cut-off mechanisms in place and working efficiently
1.8	Educate drivers to minimise vehicle excess idle times to reduce vehicle emissions	Ongoing	• Procedure in place to enforce time limits for vehicle idling • Training and awareness programs about procedure • Onboard technology trials/investment to improve driving skills

Focus Area 2 - Waste management			
No.	**Tactics and Actions**	**Timing**	**Indicators**
2.1	Participate in the PrintReleaf program, offsetting paper consumption through reforestation	Ongoing	• Monthly PrintReleaf certificates for tree planting
2.2	Reduce paper use: • Configure automatic double-sided printing • Paper consumption monitored monthly. • Increased paper consumption investigated	Ongoing	• All printers configured at set-up stage • % decrease in paper consumption per month.
2.3	• Utilise digital workplace communication app to reduce printed communications and paper-based processes	Implemented, additional tools on project-basis	• Number of digital forms and tools transitioned onto app • Engagement statistics of the workforce high enough to reduce printed collateral
2.4	• Utilise digital recruitment software (MyRecruitment+) to reduce paper-based applications and info packs	Ongoing	• % job applications conducted digitally • % information packs sent digitally
2.5	• Encourage emailed payslips to reduce weekly printed payslips for workforce	Ongoing	• 100% of employees registered for electronic payslips.
2.6	• Execute online advertising and mailing list communications for service changes to reduce printed advertising and promotional collateral	Ongoing	• Campaigns use digital channels and methods as a preference • Print campaigns have documented rationale
2.7	• Promote information and trip planning apps to reduce printed timetables and network information	Ongoing	• All customer facing brand promotions and communications advertise digital channels
2.8	Responsibly handle all contaminants including spills, chemicals and waste:	Ongoing	• Evidence of appropriate calibrated equipment and trained personnel • Achieve zero pollution incidents that cause or threaten material harm to the environment annually

Focus Area 2 - Waste management			
	• Training programs in place for use of diesel, chemicals, spills and emergency management • Maintain safety data sheets for all chemicals and products used on site • Maintain appropriate calibrated equipment.		
2.9	Implement office recycling systems including: • Paper, glass, plastic recycling at all worksites • Donation of expired first aid supplies to Survival Emergency Solutions • Battery and toner recycling programs	Ongoing	• Availability of recycling facilities at depots • % reduction of waste to landfill through recycling initiatives • Zero business waste sent to landfill that can be recycled through programs.
2.10	• Recycle all e-waste, including donation of computer and phone equipment for reuse programs	Ongoing	• All scrap materials, computers, phones and other e-waste recycled through organisations and sent to developing nations

Focus Area 3 – Sustainable procurement			
No.	**Tactics and Actions**	**Timing**	**Indicators**
3.1	• Investigate and incorporate environmental initiatives in all large-scale projects, depot and asset design and construction activities	Ongoing	• Installation of solar power across worksites where appropriate • Installation of rainwater tanks at all applicable worksites • Inclusion of sustainable development project objectives in scopes
3.2	• Include requirements in fleet replacement program to ensure new vehicles meet emission standards and goals	Ongoing	• Number of buses that meet vehicle emissions minimum standards • Number of buses that meet vehicle zero emissions roadmap goals
3.3	• Progressively transition fleet to Zero Emission Buses within the scope of the Contracts	Ongoing	• Partnerships active with SA DIT and TfNSW on ZEB initiatives • Deployment of ZEB within the contract area • Depots with ZEB infrastructure
3.4	Integrate environmental outcomes into procurement and supply chain procedures: • Review all suppliers and product purchases to increase use of recycled materials including general stationery, office supplies, uniforms and other materials as applicable	Ongoing	• % of suppliers with, or working towards, a recognised EMP • Procurement and associated policies include environmental management objectives.

Focus Area 4 - Certification, compliance, and reporting			
No.	**Tactics and Actions**	**Timing**	**Indicators**
4.1	Prepare and submit compliance reports for diesel, oil, grease and electricity consumption	Annually	• Submission of annual report in October each year to the National Greenhouse Emissions Regulator with compliant outcome
4.2	Maintain up-to-date copies of all environmental permits and approvals	Ongoing	• Maintain ongoing compliance, licences and certification • Maintain up-to-date copies of all environmental permits and approvals
4.3	Maintain compliance and certification with T4NSW Clean Fleet emissions standards for NSW fleet	Annually	• Annual certification with T4NSW Clean Fleet program • Successfully complete required audits and certification requirements as part of Clean Fleet program
4.4	Maintain ISO14001 Environmental Management System Certification, conducting internal and certification audits	Ongoing	• Successful surveillance audits through external certification body annually for ISO14001 certification • Successful re-certification audit every 3 years
4.5	Implement actions and improvements responsive to audit findings & non-conformance reporting	Ongoing	• All non-conformance and actions arising from audits addressed on time
4.6	Raise awareness of environmental risks and impacts through incident and near miss reporting procedures	Annually	• Number of actual vs reported environmental incidents • Met reporting time frames for incidents and near misses
4.7	Monitoring and reporting systems in place through asset management system	Annually	• Review of all asset management activities and programs to report/record on environmental initiatives through asset life cycle

Focus Area 5 - Continuous improvement			
No.	**Tactics and Actions**	**Timing**	**Indicators**
5.1	Quarterly review and reporting of the EMP to assess implementation and compliance	Annually	• Quarterly Contract reporting includes the EMP's compliance and outcomes
5.2	Create an organisational culture focused on environmental awareness	Ongoing	• Environmental training and awareness program delivered for all staff • Clearly defined accountability and responsibility documentation
5.3	Develop information and awareness on environmental management into induction training for employees, including ISO certification awareness	Ongoing	• Awareness campaigns developed and implemented • Educational resources are accessible to employees • Number of articles and messages distributed annually through internal and external communications • Maintained staff awareness of emergency procedures and pollution prevention through induction and ongoing training
5.4	Review and update the EMP to action opportunities for improvement	Annually	• Review and update completed annually • Review of company, legislative and contractual requirements completed annually • Non-conformance and audit reports demonstrating improvements
5.5	Adapt a whole-of-business approach to lessons learned from trend analysis, audit findings, non-conformance reporting and other impacts to environmental management	Ongoing	• Implementation of learnings and insights into specific operational procedures • Non-conformance reports actioned and completed on time • Develop and implement regular audits of pollution control devices
5.6	Annual review and update of job descriptions, environmental policies, procedures, company work instructions and standard department practices reflecting improvement opportunities	Annually	• Company governance documents amended to reflect environmental initiatives and improvements

Focus Area 5 - Continuous improvement			
5.7	Promote public transport to encourage modal shift from private vehicles through Busways' customer plans	Ongoing	• Patronage increase
5.8	Incorporate environmental protection in Busways' Reconciliation Action Plan to deepen the respect shown for Aboriginal connection to land	Ongoing	• Engagement activities with Local Aboriginal Land Councils
5.7	Management review and discussion: • Environmental incident alerts • Audit findings and non-conformances • Consumption trends • Recommendations for improvement.	Ongoing	• Weekly Leadership Team meeting 'Environment Moment' standing agenda item • Recommendations for improvement proposed and actioned.