

Tai Po Golf Club Limited

Proposed Golf Course Development at Tai Po Lot No. 246 Shuen Wan

Proposal on Reporting Mechanism

Reference: 289499-REP-022-03

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 289499

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Appendices

Appendix 1.1

Figure 1 of FEP-01/571/2019/A

1. Introduction

1.1 Project Background

- 1.1.1.1 In June 2017, the Chief Executive in Council has agreed in principle to the government proposal to grant a piece of land in Tai Po in exchange for its private land in Sha Lo Tung which has high ecological values. Under the non-in-situ land exchange proposal, the piece of land at the Shuen Wan Restored Landfill in Tai Po will be granted and the Sha Lo Tung site would be considered by government for active conservation management to avoid degradation and damage for long-term public enjoyment. This land exchange proposal is a unique, exceptional and isolated case, adding the idea is technically feasible as the private land ownership is largely unified under one entity and both Sha Lo Tung and the land at the landfill site, which has been planned for golf course development, are located in Tai Po, as shown in Figure 1 of FEP-01/571/2019/A (extracted as **Appendix 1.1**). The non-in-situ land exchange proposal has been completed in July 2022, and the Project Site has been handed over to the Project Proponent (PP).
- 1.1.1.2 The Project is a Designated Project (DP) under Environmental Impact Assessment Ordinance (EIAO), and an Environmental Impact Assessment (EIA) study was conducted in 2017. The *Shuen Wan Golf Course EIA Report* was approved by the Director of Environmental Protection (DEP) on 5 July 2019 (AEIAR-221/2019) ("the approved EIA Report") with the Environmental Permit (EP, EP-571/2019) issued on 20 September 2019. An application of Further Environmental Permit (FEP) has been made by Tai Po Golf Club Limited (the PP) and FEP was issued on 29 November 2022 (FEP-01/571/2019). Besides, surrender of EP-571/2019 has been applied and approved on 9 December 2022. In addition, an application for variation of EP has been made on 16 May 2023 to amend FEP-01/571/2019, and the amended EP was issued on 6 June 2023 (FEP-01/571/2019/A).
- 1.1.1.3 As stipulated in Condition 2.7 of FEP-01/571/2019/A, the Independent Environmental Checker (IEC) shall report directly to the DEP on matters relating to the Environmental Monitoring & Audit Manual (EM&A) programme and environmental impacts from the Project and shall submit to the DEP for approval, no later than one month before the commencement of the construction of the Project, a proposal on the reporting mechanism covering the approaches for the IEC and the team to report to the DEP on:
 - (i) how to discharge all the duties specified under the EM&A programme and the EP, taking into account the construction activities and programme of the Project;
 - (ii) how to handle each and every change of circumstances, emergency events relating to violation of environmental legislation (such as illegal dumping relating to the Project) or non-compliance (including suspected non-compliance) with the recommendations (such as construction methods, mitigation measures, and environmental standards) of the approved EIA Report, the EM&A Manual and the EP, which might affect the monitoring and/or control of adverse environmental impacts from the Project; and
 - (iii) how to keep proper records in order to respond to questions and enquiries from the DEP on the EM&A programme and duties discharged by the IEC.

1.2 Purpose of the Proposal of Reporting Mechanism

1.2.1.1 The Proposal of Reporting Mechanism is prepared to comply with Condition 2.7 of FEP-01/571/2019/A. The IEC shall report directly to the DEP on matters relating to the EM&A programme and environmental impacts from the Project and shall submit to the DEP for approval. This Proposal contains details of the discharge of routine duties, the handle mechanism of each and every change of circumstances, emergency events relating to violation of environmental legislation, and proper records keeping and report and information transfer mechanism.

1.3 Structure of the Proposal of Reporting Mechanism

1.3.1.1 The structure of the Proposal of Reporting Mechanism is given below:

Section 1	Introduces the project background and purposes of this Proposal of
	Reporting Mechanism

- **Section 2** Describes the duties of IEC
- **Section 3** Presents the Organisation of the IEC and its Supporting Team
- **Section 4** Describes the Proposed Reporting Mechanism
- Section 5 Depicts the Review of the Reporting Mechanism

2. Duties of the IEC

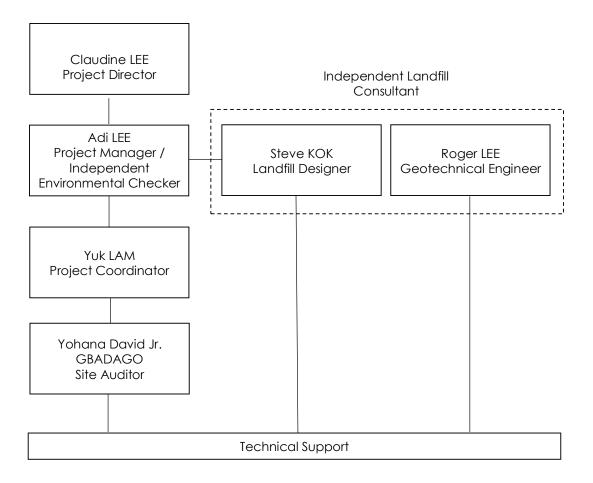
2.1 Overview

- 2.1.1.1 The IEC duties under the Environmental Permit FEP-01/571/2019/A are:
 - (i) to audit the overall EM&A performance, including the implementation of all environmental mitigation measures and monitoring activities on site;
 - (ii) to verify the environmental acceptability of permanent and temporary works, relevant plans and submissions required in the EM&A Manual and under the EP;
 - (iii) to verify the log-book(s) kept by the ET for recording the occurrence of each and every instance or circumstance or change of circumstances, which may affect the compliance with the recommendations of the approved EIA Report (Register No. AEIAR-221/2019) and the EP.
 - (iv) to notify the EPD, within one working day of receipt of notification from the ET Leader, or identification by the IEC and his / her team, of each and every change of circumstances and emergency events relating to violation of environmental legislation (such as illegal dumping relating to the Project) or non-compliance (including suspected non-compliance) with the recommendations (such as construction methods, mitigation measures, and environmental standards) of the approved EIA Report, the EM&A Manual and the EP, which might affect the monitoring and/or control of adverse environmental impacts from the Project;
 - (v) to liaise closely with the EPD;
 - (vi) to accompany the EPD in carrying out site inspections and attending meetings when requested;
 - (vii) to offer objective and professional advice on environmental issues, when requested, and to respond to questions and enquiries from the EPD on the EM&A programme and duties discharged by the IEC, with the support of relevant information, documents and records as appropriate; and
 - (viii) to allocate adequate resources, including any necessary specialist support, for discharging the duties required in the EP and the EM&A Manual.

3. Organisation of the IEC and its Supporting Team

3.1 Organisation Chart

3.1.1.1 The IEC and its supporting team members have extensive experiences in environmental monitoring and audit and environmental management. The Organization chart proposed for this Project is as follows:



3.1.1.2 Responsible persons and contact information are listed below:

Table 3.1 Contact information of responsible persons

Name	Title	Email Address	Office Telephone Number
Adi LEE	Project Manager/ Independent Environmental Checker	adilee@meinhardt.com.hk	2859 5443
Yuk LAM	Project Coordinator	yuklam@meinhardt.com.hk	2859 5490

3.2 Duties of Key Staff and Specialist Team

- 3.2.1.1 The duties of key staff and specialist team are shown below, and **Table 3.2** summarises the works to be carried out on-site:
 - (i) Project Director will oversee the operation of the IEC Team and ensure that adequate professional, technical and administrative resources are allocated to the team to carry out its duties as stipulated in **Section 2**.
 - (ii) Project Manager/ IEC will be responsible for day-to-day management and conduct the duties of the IEC as stipulated in **Section 2**. He will be the main coordinator between various parties of the Project, including the PP, the EPD, the ET, the Contractor, other Government Departments and other related stakeholders.
 - (iii) Project Coordinator will be responsible to take up the role of the IEC in his absence. He will conduct all tasks assigned to the IEC and assist the IEC to coordinate with relevant parties of the Project.
 - (iv) Site Auditor Staff will support the IEC to conduct site inspections, random sample check, and other document review, preparation of the audit reports when necessary.
 - (v) Independent Landfill Consultant will review and verify the submissions related to Design Plan and Works Plan with details on the interfacing works including all demolition, relocation, reprovision and modification works of the existing landfill restoration facilities.

Table 3.2 Tasks to be carried out on-site by IEC and the Supporting Team

Works to be carried on-site	Purposes
General site inspection	-To ensure the EIA recommendations and EP requirements are complied with
	-To review the effectiveness of environmental mitigation measures and environmental performance of the Project
	-To identify any environmental deficiency need to be improved
	-To identify any environmental non-compliance
Inspection of on- site ET Logbook	To inspect and audit the on-site logbook kept by the ET
Audit of Monitoring Works by the ET	To check, audit and verify the environmental monitoring equipment, procedures, data and results of the environmental monitoring works carried out by the ET
Meeting with ER, ET and Contractor	To discuss with ER, ET and Contractor any environmental non- compliance identified and follow up actions required
Ad hoc Site inspection	Conduct ad hoc site inspection in case of complaint receipt, exceedance of monitoring parameters, etc.

4. Proposed Reporting Mechanism

4.1 Overview

- 4.1.1.1 The reporting mechanism for the Project is described in this section. The duties of the IEC for this Project can be summarised in the following aspects:
 - (i) Document and data verification, for all submissions under the EM&A Manual and the EP, which may include, Baseline Environmental Monitoring Report, Monthly EM&A Reports, Tree Survey Report, Tree Preservation, Transplantation and Compensation Plan, Construction Phasing Plan, Construction Phase Water Quality Mitigation Measures and Monitoring Plan, Construction Dust Management Plan, Powered Mechanical Equipment Restriction Zones Review Report, Land Contamination Assessment, Design Plan and Works Plan, Updated Construction Phase Landfill Gas Hazard Assessment, Landscape and Visual Mitigation Plan, As-built Drawings of Modification Works of Existing Landfill Restoration Facilities, Updated Operational Phase Landfill Gas Hazard Assessment, Turfgrass Management Plan, Noise Mitigation Plan and other necessary submissions.
 - (ii) Conduct tasks defined in the Event and Action Plans of the EM&A Manual where applicable, and check the mitigation measures submitted by the Contractor in accordance with the Event and Action Plans;
 - (iii) Site inspections and audits, either accompanying DEP or not, scheduled or ad hoc, or other site inspections required for the EM&A programme;
 - (iv) Attend relevant site meetings as and when required, liaison meeting with PP, ET, Engineer's Representative (ER) and Contractors regarding to the EM&A programme implementation, liaison meeting with the EPD, etc.
 - (v) Offer objective and professional advice on environmental issues and the EM&A works performed by the ET; and
 - (vi) Notify the DEP of each and every change of circumstances and emergency events relating to violation of environmental legislation or non-compliance with the recommendations of the approved EIA Report, the EM&A Manual and the EP, which might affect the monitoring and/or control of adverse environmental impacts from the Project.
- 4.1.1.2 The detailed methodology on discharging the duties mentioned above are given in **Section 4.2** to **Section 4.4**. **Table 4.1** summarises the actions in table for easy reference.

4.2 Discharge of Routine Duties

Document and Data Verification

- 4.2.1.1 All submissions under the EM&A Manual and the EP, which include, Baseline Environmental Monitoring Report, Monthly EM&A Reports, Tree Survey Report, Tree Preservation, Transplantation and Compensation Plan, Construction Phasing Plan, Construction Phase Water Quality Mitigation Measures and Monitoring Plan, Construction Dust Management Plan, Powered Mechanical Equipment Restriction Zones Review Report on Land Contamination Assessment, Design Plan and Works Plan, Updated Construction Phase Landfill Gas Hazard Assessment, Landscape and Visual Mitigation Plan, As-built Drawings of Modification Works of Existing Landfill Restoration Facilities, Updated Operational Phase Landfill Gas Hazard Assessment, Turfgrass Management Plan, Noise Mitigation Plan and other necessary submissions shall be received via e-mail with or without a hard copy by the IEC team.
- 4.2.1.2 Response for each document submitted shall be made within five working days upon receipt. Monthly EM&A Report shall be commented or verified within three working days.
- 4.2.1.3 Verification letters will be printed for signature. Signed letter will be saved and recorded according to our ISO-9001:2015 quality system.
- 4.2.1.4 On-site logbook kept by ET as required by the EP Condition 2.2(v) shall be inspected on weekly basis. After each weekly inspection of the on-site logbook, and any instance or circumstance or change of circumstances will be acknowledged by signature onto the logbook, and no soft copy will be kept. Other documents kept on-site on similar manner, if any, will be treated in the same way.
- 4.2.1.5 Environmental monitoring data will be audited by the IEC once per month, additional audits may be conducted where necessary. In addition, the IEC team will conduct surprise checks on the environmental programme at least quarterly to ensure the ET carry out monitoring according to the procedures in the EP, the approved EIA Report and EM&A Manual.

Compliance with the Event and Action Plan

- 4.2.1.6 Exceedance on monitoring results, including air quality, noise, water quality as well as landscape and visual impact, will be recorded by the ET, and ET shall inform IEC, Contractor and ER in accordance to the EM&A Manual. Upon receipt of any exceedance event, IEC shall carry out the actions specified in the Event and Action Plan of the EM&A Manual, and upon receive of mitigation measures proposed by the Contractor, to review and verify the effectiveness of the proposed mitigation measures.
- 4.2.1.7 Where necessary, IEC shall discuss with relevant parties including Contractor, ET and ER regarding the proposed mitigation measures. Ad hoc site inspections shall be arranged as necessary to ensure the mitigation measures proposed is properly implemented and exceedances are rectified.

- 4.2.1.8 Verification of monitoring data will be conducted whenever an exceedance is recorded. Ad hoc inspections shall be arranged if it is deemed necessary.
- 4.2.1.9 ET shall conduct investigation and submit an Investigation Report on each exceedance event, IEC will review the report and include any additional proposal or recommendations as necessary before the submission to EPD by ET.
- 4.2.1.10 Environmental complaints are in normal case be directed to EPD, ER, Contractor or ET and the ET shall carry out complaint investigation procedure and prepare complaint investigation report (CIR) according to the EM&A Manual. IEC will review the report and include any additional proposal or recommendations as necessary before the submission to EPD by ET. Necessary site inspection will be carried out by IEC and/or his team to review the effectiveness of the mitigation measures.

Site Inspections and Audits

- 4.2.1.11 Site inspections and audits will either be a scheduled one, or an ad hoc one. Scheduled site inspections are monthly site inspections and audits arranged by ET, ER, PP or EPD. IEC team will assign staff to conduct the scheduled site inspections and audits where necessary.
- 4.2.1.12 Ad hoc site inspections and audits may be arranged if there is exceedance event identified, or improvement on mitigation measures is proposed, or instance or circumstance or change of circumstances has been identified, to ensure the Contractor comply with the proposed actions. Ad hoc site inspections initiated by other parties, including EPD or ET, will be facilitated as far as possible.
- 4.2.1.13 After site inspections and audits, an IEC Site Inspection Checklist will be prepared. The report shall include information including the date and time of the inspections, works area and activities inspected. The report will include the implementation status of the mitigation measures (e.g. waste management, dust control, noise mitigation, water quality protection, etc.), any observation and/or deficiency (e.g. mud trails outside the construction site, oil leakage, deviation from the mitigation measures in the approved plans, etc.) identified during the inspection, and any mitigation measures proposed in response to the observations. Photo records will also be included for reference. The IEC Site Inspection Checklist will be submitted to PP and copied to the EPD, the Contractor, ET, and ER for their record.
- 4.2.1.14 Site inspection and audits will be conducted at least once per month. Additional audits will be conducted when necessary. IEC Site Inspection Report will be submitted to PP and EPD and copied to the Contractor, ET, and ER for their record for each site inspection and audit conducted before the end of the next working day.

Attend meetings

4.2.1.15 Meetings to be attended by IEC would include the site environmental meetings on an as needed-basis and liaison meeting with PP, ET, ER and Contractor regarding to the EM&A programme implementation.

- 4.2.1.16 During special periods, e.g. during initial stage of a new construction contract, additional meetings with EPD may be required. Where necessary, increased frequency of regular meetings with EPD will be conducted.
- 4.2.1.17 As necessary and when requested, IEC shall accompany EPD to attend meetings with 3rd parties (e.g. District council, Rural Committee, etc.).

Offer objective and professional advice on environmental issues

4.2.1.18 IEC team will take a proactive approach when offering advices on environmental issues. During the routine inspection, the IEC team may identify environmental issues or identify potential risks, for example a new type of construction works to be commenced that may lead to environmental issues. The IEC team shall then evaluate the potential risks of the issues, such as the likeliness of exceedance, potential breach of environmental legislation and propose suitable mitigation measures, including implementing additional mitigation measures, or apply for appropriate license, etc. The IEC team will constantly review the data collected and conduct ad hoc site inspections where necessary, and report the findings to the PP and the EPD by the end of the next working day.

4.3 Handle Each and Every Change of Circumstances, Emergency Events Relating to Violation of Environmental Legislation

- 4.3.1.1 In every instance or circumstance or change of circumstances which may affect the compliance with the recommendations of the approved EIA Report or the EP, the ET shall be responsible to notify IEC within one working day. The IEC may also identify any instance or circumstance during their routine inspections and audits. Upon receipt of the notification from the ET, or identified by the IEC during inspection and audits, IEC shall discuss with the ET, ER and Contractor on the instance and conduct ad hoc site inspection where necessary.
- 4.3.1.2 The notification to EPD, together with the associated IEC Site Inspection Checklist, if available, will be prepared and be sent to the Contractor, ET, ER, PP and EPD by the end of the next working day upon receive of such notification.
- 4.3.1.3 Should events relating to violation of environmental legislation, or least having EP liability, is observed, such events will be classified as emergency issues and will be addressed immediately. IEC team member responsible for the identification of the event will immediately report to the IEC. The IEC will immediately determine if the event would contribute to violation of the EP and if the event has no EP liability, then the event will be recorded in the respective IEC Site Inspection Checklist.
- 4.3.1.4 Otherwise, if violation of environmental legislation is suspected, respective photo record will be sent to the Contractor, ET and ER immediately for further investigation. PP and EPD will also be notified by e-mail immediately. Event investigation will be conducted as soon as possible, and an Event Investigation Report will be prepared. The Event Investigation Report will be sent to EPD and PP directly, with copy to ET, ER, and Contractor for necessary follow-up action.

4.4 Proper Records Keeping and Report and Information Transfer Mechanism

- 4.4.1.1 To achieve an environmental friendly EM&A Programme, letter/facsimile as a communication channel will be avoided as far as possible. E-mail will be the main communication channel to minimise paper printing. All submissions will be delivered by email until formal submission, where hardcopies will be printed in accordance with the specific requirement.
- 4.4.1.2 Soft copy of all received submissions will be saved under the respective category. The IEC team will then review the document, seeking for professional review / advisory if required, and provide a comment on the report. If no comment is required, a verification letter will be released.
- 4.4.1.3 The comment will be saved with the received document in the same folder for easy reference. Further updates of the submitted documents will be divided into different folder with date of receipt to avoid confusion.
- 4.4.1.4 Site Inspection Checklists, Event Investigation Report, etc. will also be saved under the folder of respective reporting month.
- 4.4.1.5 All submitted documents, correspondences, reports, and received reports, information, data, etc. will be saved and/or filed according to our ISO-9001:2015 quality system. The documents will be organised under a file system implemented for the project. This filing mechanism will enable the IEC to retrieve necessary information quickly for a specific incident.
- 4.4.1.6 On request by the EPD, PP, ET or ER, required information will be extracted and sent to the requested party where appropriate.

Table 4.1 Methodologies on Discharging Duties listed in the Environmental Permit

Actions	Objectives of the Action	Timing / Frequency	Response Turnaround time	EP Condition/EM&A Manual
Routine Duties				
Document Verification / Insp	<u>pection</u>			
Review and audit of EM&A programme	To audit all aspect of the EM&A programme in independent, objective and professional manner	Throughout the Project period	Not Applicable	EM&A Manual
Submission Verification	Verification of all submissions to EPD pursuant to EM&A Manual requirements, EP Conditions and other submissions	Whenever a submission is received for verification	5 working days (3 working days for Monthly EM&A Report)	EP Conditions 2.13 to 2.27
Verification of on-site logbook (EP 2.2 (v))	Inspect and acknowledgement of the on-site logbook required under EP Condition 2.2 (v) prepared by ET	Weekly or when occurrence of an instance or circumstance or change of circumstances, which may affect the compliance with the recommendations of the approved EIA Report and the EP	1 working day	EP Condition 2.8 (iii)
Verification of environmental monitoring data	To check and verify the data collected by the ET	Once a week, or when necessary, including event of exceedance, receive of complaints, etc.	Not Applicable	EP Condition 2.8(ii) EM&A Manual 3.1.1.3
Audit the approved EIA Report recommendations and EP requirements	To ensure those EIA recommendation and EP requirements are properly implemented on-site	Throughout the Project period	1 working day (submission of IEC Site Inspection Checklist)	EP Condition 2.8(i)
Review the effectiveness of environmental mitigation measures and	To ensure those EIA recommendation and EP requirements are properly implemented on-site	Throughout the Project period	Not Applicable	EP Condition 2.8(ii)

Actions	Objectives of the Action	Timing / Frequency	Response Turnaround time	EP Condition/EM&A Manual
environmental performance of the Project				
Verify the environmental acceptability of permanent and temporary works	To ensure no adverse environmental impact to be arisen by proper implementation of mitigation measures	On needed basis	5 working days	EP Condition 2.8(ii)
Allocating adequate resources, including any necessary specialist support, for discharging the duties required in this Permit and the EM&A Manual	To provide adequate manpower to assist IEC to discharge his duties specified in the EP and EM&A Manual	Throughout the Project period	Not Applicable	EP Condition 2.8(viii)
Compliance with the Event a	nd Action Plan		l	
Conduct necessary actions specified within the Event and Action Plan in the EM&A Manual and its revisions	To fulfil the tasks required by the EM&A Manual	Whenever an exceedances or other events that triggers the Event and Action Plan	Not Applicable	EP Condition 3.3 EM&A Manual
Verify investigation results of complaints cases and the effectiveness of corrective measures	To verify the investigation carried out by the ET and the effectiveness of the proposed corrective measures to ensure the complaint cases is properly addressed	Whenever a project related complaint is received	5 working days	EP Condition 3.5 EM&A Manual

Actions	Objectives of the Action	Timing / Frequency	Response Turnaround time	EP Condition/EM&A Manual		
Site Inspections and Audits						
Scheduled site inspections and audits	To take part in the routine site inspections and audits and those initiated by ET, ER, PP, or EPD as necessary	Minimum once per month. Additional site inspections and audits may be required as requested by ET, ER, PP or EPD, where necessary	1 working day (submission of IEC Site Inspection Checklist)	EP Condition 2.8(vi)		
Ad hoc site inspections and audits	To conduct additional site inspections and audits to supplement the EM&A Programme when necessary	When necessary	Not Applicable	Not Applicable		
Attend Meetings						
Site environmental meetings	To provide opinion and discuss any issues raised within the meeting	Whenever a meeting is necessary	Not Applicable	Not Applicable		
Liaison meeting with PP, ET, RE, EPD and the Contractor	To provide opinion and discuss any issues raised within the meeting	Whenever a meeting is necessary	Not Applicable	EP Condition 2.8(vi)		
Offer objective and professional advice on environmental issues						
Offer objective and professional advice on environmental issues	To offer objective and professional advice on environmental issues, with the support of relevant information, documents and records as appropriate	When requested	Not Applicable	EP Condition 2.8 (vii)		

Actions	Objectives of the Action	Timing / Frequency	Response Turnaround time	EP Condition/EM&A Manual
Report to PP and EPD				
Monthly Audit Report	To provide a summary on the actions conducted by the IEC and also provide observation and recommendations on the EM&A works performed by the ET		Not Applicable	EM&A Manual 15.3

Actions	Objectives of the Action	Timing / Frequency	Response Turnaround time	EP Condition/EM&A Manual
Handle Each and Every Ch	ange of Circumstances, Emergency	Events Relating to Violation of E	nvironmental Legislation	
Inform EPD on each change of circumstances, emergency events relating to violation of environmental legislation	circumstances, emergency events	Whenever a change of circumstances, emergency events relating to violation of environmental legislation is received or observed	One working day after notified by ET, or when identified by IEC	EP Conditions 2.7(ii), 2.8(iv)
Discussion with ET, ER and Contractor	To obtain more information related to the changes of circumstances, emergency events relating to violation of environmental legislation	Whenever a change of circumstances, emergency events relating to violation of environmental legislation is received or observed	One working day after notified by ET, or when identified by IEC	EP Conditions 2.2(iv) 2.8(iv)
Conduct ad hoc site inspection at the works site reported	To obtain more information related to the changes of circumstances, emergency events relating to violation of environmental legislation	When necessary	Not Applicable	Not Applicable

Actions	Objectives of the Action	Timing / Frequency	Response Turnaround time	EP Condition/EM&A Manual
Proper Records Keeping an	nd Report and Information Transfer	r Mechanism		
1.0	To record all received and released documentations for the Project on site		Not Applicable	EP Condition 2.7(iii)
Retrieve relevant information and send to EPD via e-mail	To provide information to EPD upon request	Whenever a request was received from EPD	3 working days	EP Condition 2.7(iii)

5. Review of the Reporting Mechanism

- 5.1.1 When considered appropriate by the IEC or PP, the reporting mechanism would be reviewed and updated as necessary. The IEC shall review and update the reporting mechanism in consultation with the EPD, to suit the changing project situation.
- As such, the reporting mechanism detailed in this proposal shall be reviewed regularly upon commencement of construction works. Should the mechanism be optimised, the IEC shall propose the revision in the Monthly Audit Report to notify PP and EPD. This proposal shall then be updated and delivered to PP and EPD in the next reporting month for acceptance.

Appendix 1.1

Figure 1 of FEP-01/571/2019/A

