

Appendix 1 – Mitigation Measures

Cammeray Public School upgrade

23rd May 2025

Acknowledgement of Country

The NSW Department of Education acknowledges the traditional custodians of the land on which the Cammeray Public School upgrade is proposed.

We pay our respects to their Elders past and present and celebrate the diversity of Aboriginal people and their ongoing cultures and connections to the lands and waters of Australia.

The NSW Department of Education is committed to honouring Aboriginal peoples' cultural and spiritual connections to the land, waters and seas and their rich contribution to society.

The NSW Department of Education recognises that by acknowledging our past, we are laying the groundwork for a future that embraces all Australians; a future based on mutual respect and shared responsibility.

1. Mitigation Measures

A compilation of all the mitigation measures and recommendations as stated within the relevant supporting documentation is provided in Table 1 below.

The mitigation measures have been grouped as either general mitigation measures or the relevant technical discipline (i.e., transport). These mitigation measures have been prepared using DoE's *Mitigation Measures for Review of Environmental Factors* (March 2025) and as such, there may be some inconsistency in wording between Table 1 below and the recommendations in the Supporting Documents.

Table 1 identifies at which point of the process each mitigation is required to be undertaken:

- Prior to construction
- During construction
- Prior to operation
- During operation

Table 1: Mitigation Measures and Recommendations

General		
GMM1	These Mitigation Measures do not remove the obligation to obtain all other licences, permits, approvals and consents as required under any other legislation.	General
GMM2	All works must comply with the relevant Australian Standards.	General
GMM3	A Crown Certificate under Section 6.28 of the of the <i>Environmental Planning and Assessment Act 1979</i> must be obtained for any Crown building work.	Prior to construction
Community		
CEMM1	DoE's Post Approval and Compliance Team, the relevant local Council and the occupiers of any land within 20 metres of the site boundary must be notified in writing of the project. The notice must outline the works to be undertaken, the expected timing for commencement of, and completion of construction works. A minimum period of 48 hours notification prior to the commencement of any construction work must be given.	Prior to construction
CEMM2	A site notice board must be located at eye level at the entrance or other appropriate location at the site in a prominent position for the benefit of the community. The site notice must be displayed throughout the entire construction period, be A1 sized, durable, weatherproof and include the following information: <ul style="list-style-type: none"> • 24-hour contact person for the site; • Telephone and email addresses; • Site works and timeframes; and • Details of where accessible project information can be sourced 	Prior to construction
CEMM3	All complaints must be managed in accordance with DoE's Stakeholder and Community Participation Plan.	Throughout
Compliance		
PACMM1	All relevant personnel, including contractors and their subcontractors must be made aware of these mitigation	Prior to and during

General		
	measures and the requirement to undertake the works as per these mitigation measures.	construction
PACMM2	The relevant Project Lead and DOE's Post Approval and Compliance Team must be notified as soon as practical when any non-compliance with a Mitigation Measure is identified. The notification is to identify the relevant works, set out the Mitigation Measure that works are non-compliant with, the way in which it does not comply, any known reasons for the non-compliance and what actions have been, or will be undertaken, to address the non-compliance.	Throughout
PACMM3	The Project Lead must submit a Status Report to the Post Approvals and Compliance Team demonstrating compliance with the Mitigation Measures upon completion of the works.	One week prior to the commencement of Operations
Construction		
CMM1	Any demolition work must be undertaken in accordance with the provisions of Australian Standard AS 2601-2001 The Demolition of Structures.	During construction
CMM2	<p>A Construction Environmental Management Plan (CEMP) is to be prepared and implemented having regard to the Environmental Management Guidelines for Construction Procurement (Edition 4), and is to include where relevant, but not limited to, the following:</p> <ul style="list-style-type: none"> (a) Details of: <ul style="list-style-type: none"> (i). Hours of work; (ii). 24-hour contact details of site manager; (iii). Management of dust and odour; (iv). Stormwater control and discharge; (v). Measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; (vi). Any other specific environmental construction Mitigation Measures detailed in the REF; (vii). Any requirements outlined in any relevant approvals, permits, licences or landowner consents; and (viii). Community consultation and complaints handling in line with DoE's Stakeholder and Community Participation Plan. (b) Aerial Site Plan showing the location of the works; (c) The following reports are required to be prepared: <ul style="list-style-type: none"> (i). Construction Traffic and Pedestrian Management; (ii). Construction Worker Transport Strategy (iii). Construction Noise and Vibration Management; (iv). Construction Waste Management (including details on contaminated waste); (v). Construction Air Quality and Dust Management; (vi). Construction Soil and Water Management; (vii). Construction Flood Management; (viii). Aboriginal/Non-Aboriginal Heritage Management; and (ix). Demolition Work Plan 	Prior to construction

General		
	(d) Construction Tree Protection Plan; (e) Erosion and Sediment Control Plan; (f) Unexpected finds protocol for Aboriginal and non-Aboriginal heritage; (g) Unexpected finds protocol for contamination; (h) Construction Emergency Management Plan; (i) Groundwater Management Plan (If deep foundations are required) (j) Training of responsibilities/heritage site inductions under the National Parks and Wildlife Act 1975, Heritage Act 1977 and any other relevant legislation, as relevant to the works.	
CMM3	Construction site fencing is to be installed around the site. Construction vehicle and pedestrian access points to / from the site are to be clearly designated, signposted and controlled for authorised access only.	During construction
CMM4	The use and storage of hazardous materials and dangerous goods, including petroleum, distillate and other chemicals, shall be in accordance with the relevant legislation including, but not limited to: <ul style="list-style-type: none"> • Protection of the Environment Operations Act 1997; • Work Health and Safety Regulation 2017; • AS 1940:2017 The Storage and Handling of Flammable and Combustible Liquids; and • Safe Work NSW Code of Practice – Managing Risks of Hazardous Chemicals in the Workplace. 	During construction
CMM5	A spill containment kit must be available at all times on the construction site. All personnel must be made aware of the location of the kit and trained in its effective deployment.	During construction
CMM6	All materials must be wholly contained within the construction site. The requirements of the Protection of the Environment Operations Act 1997 are to be complied with when placing and stockpiling construction and waste materials, when disposing of waste products and during any other works likely to pollute drains or watercourses.	During construction
CMM7	Building methods such as brick cutting, mixing mortar and the washing of tools, paint brushes, form-work and concrete trucks shall be undertaken in the construction site in a location so as to prevent air, land or water pollution.	During construction
CMM8	All equipment and machinery shall be secured to prevent vandalism outside of construction hours.	During construction
CMM9	All contractors must meet all workplace safety legislation and requirements.	During construction
CMM10	No vehicle maintenance is permitted in the construction areas except in emergencies.	During construction
CMM11	The work site is to be left tidy and rubbish free each day prior to leaving the site and at the completion of works.	During construction
CMM12	All construction lighting shall not cause a nuisance to adjoining neighbours and comply with AS/NZS 4282:2019 Control of the Obtrusive Effects of Outdoor Lighting.	During construction
CMM13	The undertaking of any construction work, including the entry and exit of construction and delivery vehicles at the	During construction

General		
	<p>site, is restricted to the following standard work hours:</p> <p>(a) Monday to Friday inclusive: Between 7.00am to 6.00pm;</p> <p>(b) Saturday: Between 8.00am to 1.00pm; and</p> <p>(c) Sunday and Public Holidays: No work permitted.</p> <p>Where noise levels are not expected to exceed the existing background noise level plus 5dB, and noise monitoring is undertaken in accordance with the Approved Methods for Measurement and Analysis of Environmental Noise in NSW (EPA, 2022), works may also be undertaken during the following additional work hours:</p> <p>(d) Mondays to Friday inclusive: Between 6:00pm to 7:00pm; and</p> <p>(e) Saturday: Between 1:00pm to 4:00pm.</p> <p>Construction work may be undertaken outside of the standard and additional work hours outlined above, but only if notification has been given to the occupiers of any land within a minimum of 80 metres of the site boundaries before undertaking the work or as soon as is practical afterwards, and only if it is strictly required:</p> <p>(f) By the police or a public authority for the delivery of vehicles, plant or materials; or</p> <p>(g) In an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or</p> <p>(h) Where the works are completely inaudible at the nearest sensitive receiver; or</p> <p>(i) For the delivery, setup and removal of construction cranes, where notice of the crane related works is provided to Council and affected residents at least seven days prior to the works; or</p> <p>(j) Maintenance and repair of public infrastructure where disruption to essential services, required system conditions (such as low-flow conditions for sewers) and/or considerations of worker safety do not allow work within standard hours; or</p> <p>(k) Public infrastructure works where work outside the recommended standard hours is supported by the affected community to shorten the length of the project; and</p> <p>(l) Where it is demonstrated and justified for the need to work outside the recommended construction hours.</p> <p>Except in emergencies, these circumstances are not to be interpreted as endorsement for work outside the recommended standard hours and are to be justified in each case. Work schedule convenience or project expedience is not considered sufficient justification.</p> <p>Any departure from this Mitigation Measure must be immediately notified to the Post Approvals and Compliance Team.</p>	
CMM14	<p>Use of any rock excavation machinery, sheet piling, pile driving or jack-hammering and the like is restricted to the following hours:</p> <ul style="list-style-type: none"> Monday to Friday inclusive: 9:00am to 12:00pm; 	During construction

General		
	<ul style="list-style-type: none"> Monday to Friday inclusive: 2:00pm to 5:00pm; and Saturday: 9:00am to 12:00pm. 	
CMM15	<p>Vibration levels induced by demolition activities must be in accordance with the AS4236 – Guide to Noise and Vibration Control on Construction, Demolition and Maintenance Sites.</p> <p>The operation of plant and equipment must not give rise to the transmission of vibration nuisance or damage to other premises.</p> <p>Prior to commencement of vibration-generating activities, a specific vibration monitor must be set up either at the property boundary or nearest sensitive receiver to monitor and record the vibration levels affecting buildings on adjacent land using the Assessing Vibration: A Technical Guide (DECC, 2009).</p> <p>Any departures from this Mitigation Measure must be notified to the Post Approvals and Compliance Team.</p>	During construction
CMM16	<p>If the works involve an excavation that extends below the level of the base of the footings of a building, structure or work on adjoining land (including any structure or work within a road or rail corridor), under the advice of a suitably qualified engineer the works must:</p> <ol style="list-style-type: none"> Protect and support the building, structure or work from possible damage from the excavation, and Where necessary, underpin the building, structure or work to prevent any such damage. 	During construction
CMM17	<p>Building materials, machinery, vehicles, refuse, skip bins or the like must not be stored or placed in the public way (outside of any approved construction works zone) under any circumstances.</p>	During construction
CMM18	<p>The Construction Waste Management Plan to be included in the CEMP is to be prepared in accordance with the Department of Environment and Climate Change (DECC) Waste Classification Guidelines (2008) and the <i>Protection of the Environment Operations Act 1997</i> and include (not limited to) the following conditions/mitigation measures:</p> <ul style="list-style-type: none"> The work site is to be left tidy and rubbish free each day prior to leaving the site and at the completion of the works; Non-recyclable waste and containers are to be regularly collected and disposed of at a licensed waste disposal site. Frequency of collection needs to be identified and records maintained; No burning or burying of waste is permitted on the site; Any bulk garbage bins delivered by authorised waste contractors are to be placed and kept within the site boundary; No materials will be used in a manner that will pose a risk to public safety and waste generated from the works will be recycled wherever possible; All loose material stockpiles are to be stored within the temporary construction compounds and are to be protected from possible erosion; Unnecessary resource consumption will be avoided; 	Prior to construction

General		
	<ul style="list-style-type: none"> All soils and materials (liquid and solid) to be removed from the site must be analysed and classified by an appropriately qualified consultant in accordance with the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and related guidelines, in particular the NSW EPA Waste Classification Guidelines, prior to offsite disposal; and All waste must be disposed of at an appropriately licensed waste facility suitable for the specific waste. Receipts for the disposal of the waste must be submitted to the SINSW Project Director within 14 days of the waste being disposed. Additional project-specific conditions/mitigation measures are also to be included, as required. 	
Soil & Water		
SWMM1	An Erosion and Sediment Control Plan must be implemented in accordance with the Landcom/Department of Housing <i>Managing Urban Stormwater, Soils and Construction Guidelines</i> (Blue Book). The controls must be in place, inspected and managed until the works are complete and all exposed erodible materials are stable relevant to each construction stage. Inspection records must be kept and provided to the Post Approval and Compliance Team on request.	During construction
SWMM2	<p>Imported fill must be compatible with the existing soil characteristics of the site and limited to the following:</p> <ul style="list-style-type: none"> (a) Virgin excavated natural material (VENM); and/or (b) Excavated natural material (ENM) certified as such in accordance with Protection of the Environment Operations (Waste) Regulation 2014; and/or (c) Material subject to a Waste Exemption under Clause 91 and Clause 92 of the Protection of the Environment Operations (Waste) Regulation 2014 and recognised by the NSW Environment Protection Authority as being “fit for purpose” with respect to the works under the REF. <p>Certificates from a suitably qualified person/contractor proving that the imported fill material complies with these requirements must be provided to the relevant DoE Project Lead prior to filling works.</p>	During construction
SWMM3	Any imported mulch must comply with the Resource Recovery Order under Part 9, Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014 and the Mulch Order 2016 recognised by the NSW Environment Protection Authority as being “fit for purpose” with respect to the works under the REF. Mulch must not	During construction

General		
	include physical or chemical contaminants and minimise harm to the environment through the introduction, spread or increase in any weed, disease or pest. A written statement provided by the supplier confirming compliance with the Resource Recovery Mulch Order 2016 is to be provided to the relevant DoE Project Lead prior to importing the mulch.	
SWMM4	Should any unexpected groundwater be encountered during construction works, works are to cease immediately. Where groundwater needs to be removed, an approval may be required under the Water Management Act 2000.	During construction
SWMM5	The existing stormwater structures and outlets are to be maintained to prevent any impact on the existing building and new building.	During occupation
Traffic, Access and Parking		
<i>Preliminary Construction Traffic and Pedestrian Management</i>		
TT1	Safe pedestrian access in and around the site shall remain unimpeded at all times. Required informative signage and directional information must be provided in appropriate locations ensuring pedestrian safety. Where necessary, traffic control measures will be implemented.	During construction
TT2	Construction activities are to be phased to minimise traffic impacts.	During construction
TT3	Ensure temporary traffic control devices and signage are implemented during construction including: <ul style="list-style-type: none"> • Installation of clear, consistent, and visible signage to guide road users safely through detours and work zones. • Use of barriers and cones to delineate work zones and guide traffic effectively. Provide traffic control to manage and regulate traffic movements during construction.	During construction
TT4	Ensure continuous monitoring of traffic management during construction including: <ul style="list-style-type: none"> • Continuously monitoring traffic conditions and the effectiveness of traffic management strategies. • Make adjustments based on real-time traffic conditions and emerging challenges. 	During construction
TT5	Site is to be secured and made safe from the public throughout construction via the erection of a perimeter fence, including shade cloth hoarding attached to prevent unauthorised entry to the site.	Prior to and during construction
TT6	All construction vehicles are to travel along Miller Street to enter and egress the site. Heavy vehicle movement is required to avoid school drop-off and pick-up times. Only small construction vehicles may access Bellevue Street for minor works on the eastern side of the site.	During construction
Noise and Vibration		

General		
Mechanical		
NV1	Based on the current mechanical design, external plant are limited to 6 x HVAC outdoor units located on the western side of the building. HVAC fans located at the highest occupied level (if required).	During construction
NV2	During mechanical equipment selection, the combined sound pressure levels at 1m for the mechanical plant is not to exceed 88 dBA.	Prior to construction
Construction		
NV3	Installation of a 2m solid noise barrier between the plant and Building E and between the plant and Building F in accordance with Section 7.2 and 8.1.2 of the Noise and Vibration Impact Assessment.	During construction
NV4	All equipment during the excavation and demolition phase are to have a 50% on-time.	During construction
NV5	All equipment during the construction and fitout works are to have a 50% on-time, except any circular saws which are to have a 25% on-time.	During construction.
NV6	Block E is to be partially vacated during the course of construction, as required.	Prior to and during construction
NV7	Classrooms in Blocks E and F are to be vacated during particularly loud construction activities, as required.	During construction
NV8	Closing classroom windows while loud works occur, as required.	During construction
NV9	Not all machinery is to be used simultaneously.	During construction
Contamination and Hazardous Materials		
LCMM1	During construction works, should any unexpected contamination information or contaminants be identified which have the potential to alter previous site contamination assessments, conclusions and recommendations, the relevant DoE Project Lead must be immediately notified and works must cease in the location of the contamination. Works must not recommence until a suitably qualified and experienced contamination consultant has investigated the unexpected contamination and provided recommendations for the management of necessary remedial work required to render the site suitable for the activity in accordance with any relevant NSW EPA adopted guidelines. A Completion Certification from the contamination consultant shall be submitted to the relevant DoE Project Lead prior to construction works re-commencing. Following completion of the remediation through implementation of the recommendations from the suitably qualified contamination consultation, a Site Remediation and Validation Report is to be submitted to a NSW EPA-Accredited Site Auditor to confirm site suitability. A copy of the Site Remediation and Validation Report is also to be provided to the relevant DoE Project Lead and DoE's Post Approval and Compliance Team. A notice of completion of remediation work must also be given to Council in accordance with Section 4.14 and Section 4.15 of <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> .	During construction
LCMM2	If base fill material (below asphalt) is required to be	Prior to and during

General		
	removed and disposed off-site, a material classification assessment is required to be undertaken for the surplus material.	construction
Non-Aboriginal Heritage		
HER1	If any unexpected archaeological relic (or potential relic) of heritage significance is discovered during any construction work, all work in the vicinity must cease and the area must be appropriately protected. Materials are not be removed from the ground wherever possible. The DoE Heritage Team is to be notified and an archaeologist engaged to undertake a site inspection to ascertain whether the finds are significant relics. Construction works cannot recommence in that area until advised by the archaeologist, in consultation with the DoE Heritage Team. Should significant relics be identified, external approvals to impact the relics may be required.	During construction
HER2	Relocated Wireless Access Point (WAP) units and associated conduits need to be fixed externally to walls, maximising the use of existing conduits where possible. Cabling must not be chased within significant fabric and options for cables to run through floor and roof spaces are to be investigated. New fixtures need to be affixed into existing mortar joints. Existing WAP locations to be made good on completion of the works.	Prior to and during construction
HER3	Following the replacement of the Main Switchboard and shelving in the communications room, the surrounding fabric is to be made good and painted to match the character finishes and detailing of the space.	During construction
Aboriginal Heritage		
HMM1	If human remains are identified, work must cease and the area around where the remains are found must be protected from all disturbance. Finds are not to be displaced from the location where they are found. The DoE Heritage Team is to be notified and a specialist archaeologist engaged to assess the find. If human skeletal material less than 100 years old is discovered, the NSW Police are to be contacted in accordance with the <i>Coroners Act 2009</i> . Aboriginal burials (older than 100 years) are protected under the <i>National Parks and Wildlife Act 1974</i> and are not be disturbed. Should the skeletal material prove to be archaeological Aboriginal remains, Heritage NSW and the Local Aboriginal Land Council must be notified. Notification is also to be made to the Commonwealth Minister for the Environment, under the provisions of the <i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i> .	During construction
Tree Protection		
TMM1	Inspect relevant trees for hollows and nests prior to construction. If fauna is discovered an ecologist will be required to remove and relocate any fauna if the tree or vegetation is to be removed.	Prior to construction
TMM2	Pruning works are to be carried out by the Project Arborist who holds a minimum qualification (using Australian Qualifications Framework) of Level 3 or above in arboriculture or its recognised equivalent and has a	Prior to construction

General		
	<p>minimum of 3 years of practical experience.</p> <p>Pruning works are to be undertaken in accordance with the AS 4373: Pruning of Amenity Trees (2007), Safe Work Australia Guide for Managing Risks of Tree Trimming and Removal Work (2016) and other applicable legislation and codes.</p>	
TMM3	<ul style="list-style-type: none"> All trees to be protected are to be clearly identified and all TPZs surveyed. TPZs will be maintained around vegetation to be retained, in accordance with AS 4970 (2009) TPZ fencing is to be installed prior to any site works (including demolition) and remain in place for the duration of the demolition and construction processes. The fence must be 1800mm high chain wire mesh fixed to Galvanised steel posts. Comply with AS 4419 (1998) and AS 4454 (1999) leaf mulch with 90% recycled content for tree protection fencing. Chip trees marked for removal and use mulch 100mm deep. Coir logs are to be installed on the perimeter of the TPZ fencing to prevent runoff. The tree protection measures must be inspected by the Project Arborist prior to the start of site works, including demolition. Tree protection signage must be attached to TPZ before works begin. Signs are to be displayed prominently and repeated at 10m intervals or closer when the fence changes direction. 	Prior to construction
TMM4	Replacement planting is to be provided when trees are removed, in accordance with Australian Standard 2303: Tree Stock for Landscape Use (2015). Replacement trees are to be supplied as advanced size stock.	Prior to operation
TMM5	No activities are to take place within the Structural Root Zones (SRZs) of mature trees.	During construction
TMM6	No works, stockpiling of bulk or harmful materials, excavation, soil compacting, parking or any other potentially harmful activities (e.g. spoil from excavation) will be undertaken within TPZs or above tree roots unless the Project Arborist has provided confirmation that the works will not impact the tree (Arboricultural Impact Assessment and Tree Protection Specification at Appendix 8).	During construction
TMM7	No trenching, plant, machinery or pedestrian access is permitted within TPZs.	During construction
TMM8	Contaminants (e.g. cement dust) are to be stored properly with spill measures.	During construction
TMM9	With regards to Tree 13, no over-excavation, battering or benching is to be undertaken beyond the footprint of any structure unless approved by the Project Arborist. Hand excavation and root pruning along the excavation line is to be completed prior to the commencement of mechanical excavation to prevent tearing and shattering damage to the	During construction

General		
	roots.	
Site Services		
UIMM1	All services and utilities in the construction area must be appropriately disconnected and reconnected as required, in consultation with the relevant authorities to determine disconnection and reconnection requirements. Where services or utilities are found not to be adequate to support the works, appropriate augmentation must be undertaken, subject to obtaining any required approvals or permits.	During construction
Operational Management		
OPMM1	Prior to the commencement of operations, any operational waste management measures shall be detailed in an Operational Waste Management Plan. This Plan must outline how waste will be minimised, handled, stored and disposed of appropriately, in accordance with any relevant guidelines. A copy of the Operational Waste Management Plan is to be provided to the relevant DoE Project Lead for implementation during operations.	Prior to operations
OPMM2	Waste is to be collected by garbage collection vehicles only between the hours of 7.00am and 8.00am or between 6.00pm to 9.00pm Mondays to Saturdays only, with no collection to take place on Sundays.	During operation
OPMM3	<p>Prior to the commencement of operations, a Stormwater Operation and Maintenance Plan is to be prepared and include the following:</p> <ul style="list-style-type: none"> (a) Maintenance schedule of all stormwater quality treatment devices; (b) Record and reporting details; and (c) Work Health and Safety requirements. <p>A copy of the Stormwater Operation and Maintenance Plan is also to be provided to the relevant DoE Project Lead for implementation.</p>	Prior to operations
OPMM4	All operational plant and equipment must be maintained and operated in proper and efficient manner and in accordance with the user manual.	Operations
OPMM5	Prior to the commencement of operations, it must be demonstrated by a suitably qualified acoustic engineer that noise associated with the operation of mechanical plant or machinery installed does not exceed the relevant project noise trigger levels.	Prior to operations
OPMM6	<p>Landscaping at the site associated with the works must be maintained. This includes the undertaking of:</p> <ul style="list-style-type: none"> (a) Mulching (b) Concrete/paving maintenance and replacement (c) Outdoor furniture maintenance and replacement (d) Turf replacement 	Operations

General		
	<ul style="list-style-type: none"> (e) Planting and tree replacement (f) Planting and tree maintenance (trimming) (g) Watering (h) Irrigation maintenance (i) Mowing (j) Spraying and pest treatment. 	
OPMM7	<p>Prior to the commencement of operations, a School Transport Plan must be prepared to the satisfaction of the DoE Transport Planning Team. If the school already has a School Transport Plan, the existing plan is to be reviewed and updated if necessary to reflect the impacts of the REF works, to the satisfaction of the DoE Transport Planning Team. A copy of the School Transport Plan is to be provided to the relevant DoE Project Lead for implementation during operations.</p>	Prior to operations