

Traffic Management Plan - CTT

PURPOSE	The Traffic Management Plan (TMP) details control strategies for traffic movements onsite and offsite throughout the operation of the CTT and forms part of the Operational Environmental Management Plan (OEMP), in accordance with relevant COC requirements. The TMP ensures that traffic impacts from the activities undertaken during the CTT's operational phase are suitably managed and details the relevant control strategies and monitoring procedures.
----------------	--

Scope	This TMP has been prepared to provide the management measures implemented to minimise potential traffic related adverse impacts during the operation stage of the CTT.
Review Frequency	3-yearly, or as required

CONTENTS	Revision History Definitions/Abbreviations Introduction Overview Scope and Objectives Legal and Other Requirements Conditions of Development Consent Environment Protection Licence Stakeholder Consultation Government Bodies Community Goals of TMP Roles and Responsibilities Existing Environmental and Operational Impacts Existing Environment Operational Activities Operation Hours Operational Vehicle Types Predicted Traffic Impacts Traffic Management Measures
-----------------	---

	Traffic Mitigation Measures Site Description Operation Hours Training Traffic Congestion Procedure Professional Conduct Workplace Safety Driver's Licence Requirements Drug and Alcohol Policy Traffic Monitoring and Reporting Monitoring Program Performance Reporting and Review Exceedances and Corrective Actions Publishing of Monitoring Data References Appendix A - Traffic Route Plan
--	---

Quality Information

Initial Plan Details:	Initial Plan Prepared by:	Reviewed By:	Authorised by:
Name:	Anae Ressos	Rod Jones and Ramona Bachu BSc; GDip; MEEM	Sara Maddison BE(Civ); BE(Env)
Position:	Environmental Coordinator	Facilities Manager - Clyde/Greenacre Acting NSW Environmental Compliance Advisor	Operations Project Manager/ Environmental Management Representative
Signature:		 	

Company	Veolia Environmental Services (Australia) Pty Ltd
ABN	20 051 316 584
Line of Business	Waste
Facility	Clyde Transfer Terminal
Address	322 Parramatta Road, Auburn NSW

Version	Revision Details	Reviewed by	Date
1	First draft for internal review	NSW Resource Recovery Technical Team ANZ People & Safety SHEQ Team	06 November 2020
	Second draft for internal review	NSW Resource Recovery Technical Team ANZ People & Safety SHEQ Team	29 July 2021
	Final draft	Department of Planning, Industry and Environment	30 July 2021
2	Internal Review	NSW Resource Recovery Technical Team	07 July 2023

		Site Environmental Management Representative ANZ People & Safety SHEQ Team	
3	Internal Review of amended draft (Environmental Management Representative / Environmental Advisor)	Facility Manger - Bob Manevski ANZ People & Safety SHEQ Team - Ken Dekok, Semisi Tara NSW Environmental Manager - Kelly Gee	16 January 2025
	Final draft submitted for endorsement	Department of Planning, Housing and Infrastructure	30 January 2025

Definitions/Abbreviations

See definitions in the [BMS Dictionary](#) - Only definitions directly pertaining to this document are included.

Subject	Definition
AEMR	Annual Environmental Management Report
BMS	Business Management System
CCC	Community Consultative Committee
CTT	Clyde Transfer Terminal
COC	Conditions of Development Consent
DA	Development Application
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EP&A	Environmental Planning and Assessment (Act and Regulations)
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ERP	Emergency Response Plan
NMP	Noise Management Plan
OEMP	Operational Environmental Management Plan
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations Act 1997
RMS	Roads and Maritime Services
SHEQ	Safety, Health, Environment & Quality
TPA	Tonnes per annum
TMP	Traffic Management Plan
Veolia	Veolia Australia and New Zealand
WHS	Work Health and Safety (Act and Regulation)

1. Introduction

1.1. Overview

Veolia Australia and New Zealand (Veolia) operates the Clyde Transfer Terminal (CTT), which is located within a portion of the Clyde Rail Yard, at 322 Parramatta Road, and forms part of Lot 201 of DP10076683 in the Cumberland Local Government Area. Refer to Site Layout Plan in **Appendix A** of the Operational Environmental Management Plan (OEMP).

The CTT facility has been approved by the consent to receive up to 600,000* tonnes per annum (TPA) (c.10, MOD 5 of consent) of waste from within the Sydney Region. However, until the requirements of the “expanded operations” are satisfied as per MOD 5, CTT is only authorised to receive up to 500,000 tonnes of waste per annum (calendar year). As of January 2025, CTT has not yet satisfied the requirements of MOD 5 which allow for it to receive 600,000 TPA.

Waste received at CTT is containerised and loaded onto rail wagons for transportation by rail to the Woodlawn Eco Precinct (owned and operated by Veolia) in the Southern Tablelands (approximately 250 kilometres southwest of Sydney) for treatment, recycling and energy recovery.

The Minister of Planning approved the Development Application (DA) 205-08-01 on 29 August 2002, in accordance with section 89 (e) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Conditions (‘consent conditions’) of Development Consent (Consent) were issued to stipulate regulatory requirements for the operation of the CTT.

There have been a number of modifications since to the consent conditions which have been approved by the Department of Planning, Industry and Environment (DPIE) in accordance with section 75W of the *Environmental Planning and Assessment Act 1979*;

MOD 1 - issued 2007

MOD 2 - issued 2008

MOD 3 - issued 2010

MOD 4 - issued 2014

MOD 5 - issued 2019

A review of this Traffic Management Plan (TMP) was triggered by modification application (DA No. 205-08-01 MOD 5) to increase waste acceptance to 600,000 TPA in 2020.

This Traffic Management Plan (TMP) has been prepared in accordance with the requirements of the Conditions of Development Consent (COCs) and Environment Protection Licence (EPL) issued for the CTT. The TMP ensures that traffic impacts from the activities undertaken during the CTT’s operational phase are suitably managed and details the relevant control strategies and monitoring procedures as per the requirements of the Consent and its modifications.

The CTT includes the following infrastructure:

- An access road for waste trucks entering and exiting the facility from Parramatta Road.
- Incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility.
- An enclosed building for the unloading and handling of waste, with environmental controls such as dust suppression and odour control systems.

- A hardstand area for temporary storage and manoeuvring of full and empty sealed shipping containers prior to loading onto trains.
- Rail sidings for the loading of containers onto trains for rail transport to Woodlawn.

1.2. Scope and Objectives

The purpose of this TMP is to provide traffic management procedures to form part of the CTT Operational Environmental Management Plan (OEMP), in accordance with the Consent conditions, EPL, relevant legislation and as part of Veolia's Business Management System (BMS).

The OEMP is the working environmental management tool for the operation of the CTT, concentrating on key environmental issues, including supporting detailed plans for the management of water quality, waste, traffic, air quality, noise, contamination, pest and vermin and emergency response.

The objectives of this document are to establish monitoring programs and control strategies for the delivery of waste to the CTT by the drivers and owners of waste delivery vehicles.

1.3. Legal and Other Requirements

The following regulatory framework applies to this TMP:

- Development Application (DA 205-08-01) issued under the *Environmental Planning and Assessment Act 1979*, in accordance with section 89(e) of the *Environmental Planning and Assessment Act 1979* (EP&A Act);
- Environment Protection Licence (EPL.11763) issued under the *Protection of the Environment Operations Act 1997* (POEO Act).

The site also operates in compliance with all other relevant legislation, regulations, guidelines and Standards.

1.3.1. Conditions of Development Consent

The Consent Conditions related to the Traffic Management Plan are detailed in **Table 1.1** below.

Table 1.1 Conditions of Consent Requirements

Relevant Conditions	Requirement	TMP Reference
50	The Traffic Management Plan must address, but is not necessarily limited to, the following issues: (a) An education program for all drivers and owners of waste vehicles using the site, about the "left turn only" restrictions on entering and leaving the premises via Parramatta Road (b) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the "left turn only" restriction upon entering or leaving the premises via Parramatta Road.	Noted and addressed in the following sections of the Traffic Management Plan; a) Section 4.1.3 (Training)

	(c) An education program for all drivers and owners of waste vehicles using the site, about the waste transport routes permitted to be used in the vicinity of the development (d) A monitoring and recording program to identify and record any waste vehicle and its driver that breaches the permitted transport routes (e) An enforcement program including the imposition of identified punitive measures against any driver or vehicle owner whenever the above restrictions are breached (f) Contracts with waste transporters to include conditions addressing entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances. (g) Measures to minimise trucks and other heavy vehicles from entering or exiting the premises between the following hours: 10pm and 5am Mondays to Saturdays; 10pm and 7am Sundays and public holidays.	b) Section 5.1 (Monitoring Program) – to include info from prior plan c) Section 4.1.3 (Training) d) Section 5.1 (Monitoring Program) (e) Section 5.3 (Exceedances and Corrective Actions) (f) Section 4.1.1 (Approved Entry/Exit) (g) Section 4.1.2 (Operation Hours)
118	All access to the development shall be via a sealed access road from Parramatta Road. No vehicle shall enter or exit the development via the internal road connecting the Clyde Marshalling Yards to Rawson Street.	Noted and addressed in Section 4.1.1 (Approved Entry/Exit)
119	No vehicle is permitted to turn right into the site off Parramatta Road until the intersection upgrade works have been completed to the satisfaction of Cumberland Council and Roads and Maritime Services (RMS).	Noted and addressed in Section 4.1.1 (Approved Entry/Exit)
119A	Prior to the commencement of construction of the intersection upgrade works, the design of the intersection must be prepared in consultation with and to the satisfaction of Cumberland Council and RMS. The intersection design must accommodate the largest vehicle associated with the development as follows: (a) turning right into the development from Parramatta Road (e.g. 12.5 metre rigid waste trucks); (b) turning left into the development from Parramatta Road (e.g. semi trailers); and (c) turning left out of the development onto Parramatta Road (e.g. semi trailers).	Noted and addressed in Section 4.1.1 (Approved Entry/Exit)
119B	All intersection works must be to the full cost of the Proponent and at no cost to RMS or Cumberland Council	Noted
119C	The intersection upgrade works along Parramatta Road/private access road must be designed to meet RMS requirements, and endorsed by a suitable qualified practitioner. The design requirements must be in accordance with AUSTROADS and other	Noted

	Australian Codes of Practice. The certified copies of the civil design plans must be submitted to RMS for consideration and approval prior to the release of the Construction Certificate by the Principle Certifying Authority and commencement of road works	
119D	The Proponent is required to enter into a Work Authorisation Deed (WAD) for the intersection works.	Noted
119E	Within 6 months of commencement of right-turn movements into the site, a road safety audit (RSA) must be undertaken for the intersection of Parramatta Road and the private access road by a suitably qualified, independent professional. The results of the RSA, including a program for the implementation of any audit recommendations, must be submitted to Cumberland Council and RMS for consideration and review within 60 days of completion of the audit.	Noted
120	No vehicle exiting the development shall turn right onto Parramatta Road.	Noted and addressed in Section 4.1.1 (Approved Entry/Exit)
121	The Traffic Management Plan must be implemented for the duration of the operation of the development, to the satisfaction of the Planning Secretary.	Noted
122	Prior to the commencement of construction activities, the Applicant shall demonstrate to the satisfaction of the Planning Secretary, it has reasonable arrangements in place in respect of its use of the right of carriageway, concerning traffic sharing, protection of underground and above-ground services in the vicinity of the carriageway and the potential impacts on the existing weighbridge.	Noted
124	The Applicant shall fund a traffic study, to be conducted by an independent, suitably qualified person. The study is to be completed and submitted to the Planning Secretary within 14 months from commencement of operations, review the operation of the access road in the first 12 months of the development and recommend any future actions to ensure sufficient future capacity of the access road. The Applicant shall provide a reasonable financial contribution towards any upgrade of the access road recommended by the study.	Noted

1.3.2. Environment Protection Licence

The Environment Protection Licence (EPL 11763) requirements related to the Traffic Management Plan are detailed in **Table 1.2** below.

Table 1.2 Environment Protection Licence Requirements

Relevant Conditions	Requirement	TMP Reference
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Noted and addressed in Section 4.1.5 (Professional Conduct)

1.4. Stakeholder Consultation

As part of an ongoing commitment to stakeholder engagement, Veolia implemented a program of communication and consultation during the preparation of this TMP, consulting with government bodies and other key stakeholders.

1.4.1. Government Bodies

The following government agencies were consulted with in relation the requirements of this TMP during its development, and will continue to be consulted where relevant:

- NSW Department of Planning, Industry and Environment;
- NSW Environment Protection Authority;
- Cumberland City Council
- Roads and Maritime Services (RMS)

1.4.2. Community

Veolia's communication with the community, and other stakeholders may include the following, where applicable:

- Community Consultative Committee meetings;
- Public notices and announcements;
- Meetings and correspondence with appropriate regulatory authorities; and
- Discussions with adjoining landowners / neighbours who may be affected by the CTT.

The key objectives of the community focused communication and consultation program include:

- Educating stakeholders regarding key aspects of the CTT; and
- Informing community groups and neighbours to help Veolia understand any concerns.

Veolia aims to ensure that the local community is kept informed of the progress and operation of the CTT in a proactive and responsive manner.

The following avenues provide ongoing availability of information about the CTT:

- Dedicated Veolia webpage (including contact details):
<https://www.veolia.com/anz/our-services/our-facilities/transfer-stations/clyde-transfer-station>

- Community telephone line and email address:

Method	Contact
CTT 24-hour Community Feedback and complaints phoneline	(02) 9841 2600
Dedicated email address	clyde.weighbridge@veolia.com

- Published management plans, independent environmental audits and annual monitoring reports:
<https://www.anz.veolia.com/our-facilities/transfer-stations/clyde-transfer-station-nsw>
- Published Monitoring Data:
<https://www.veolia.com/anz/about/about-veolia/operational-compliance/nsw-monitoring-reports>

2. Goals of TMP

The goal of this TMP is to provide traffic management procedures to form part of the CTT Operational Environmental Management Plan (OEMP). It has been prepared to align with the needs of the CTT COCs and relevant legislation.

The goals of the TMP are to describe the measures to ensure that:

- the nominated haulage routes are used including adherence by drivers to any road use restrictions;
- conflicts with other road users are minimised;
- drivers adhere to Veolia's driver code of conduct; and
- road noise impacts are minimised through measures such as limiting truck compression braking

Additionally the TMP will illustrate the designated haulage routes for use by heavy vehicles during operation to and from the site.

2.1. Roles and Responsibilities

The following table details the roles and responsibilities associated with the TMP.

Table 2.1 TMP Roles and Responsibilities

Action	Responsibility	Timing
Overall implementation of the TMP	Facility Manager	Ongoing
Implementation of monitoring program and report compilation	Facility Manager or nominee(s)	Ongoing
Maintain internal records of monitoring	Monitoring Personnel	As required
Collate and maintain records of complaints, respond to complainant	Facility manager and/or nominee	Upon receipt of complaint
Identify non-conformances and notify Facility Manager/ Safety Health Environment Quality (SHEQ) Representative	Operational personnel	Ongoing
Authorise and confirm the implementation of mitigation measures	Facility Manager	As required
Training and communication	Facility Manager /Environmental Advisor	Training as required, 12 monthly corporate refreshers Monthly toolbox meetings to discuss any safety and compliance issues, including

		dust, that have arisen since the previous meeting. Review of any complaints received relating to site traffic or dust, and reports from monitoring conducted as a result.
Review and update of this Traffic Management Plan	Facility manager and/or nominee	Reviews to be conducted as required to assess whether the plan is achieving its requirements of relevant approval conditions. It should also take into account environmental monitoring records, corrective actions and the results of any audits. Other examples include: following significant environmental incidents, where there is a need to improve performance in an area of environmental/traffic impact.

3. Existing Environmental and Operational Impacts

3.1. Existing Environment

3.1.1. Operational Activities

All waste transport vehicles enter the CTT site from Parramatta Road, and then via the incoming weighbridge. Vehicles accessing the waste area of the transfer terminal building drive in via the entry door on the north-west corner of the building. The vehicles then back up to the north-eastern wall and deposit their load, before exiting via the same entry, on the alternate side.

Employees and visitors also use the Parramatta Road entrance. Parking is provided adjacent to the transfer terminal building. 14 car parking spaces are provided for staff and visitor parking.

3.1.1.1. Operational Vehicle Types

A range of waste vehicle types deliver waste to the CTT, with the majority of vehicles delivering putrescible waste being either front lift or rear lift trucks.

Front lift trucks, an example of which is shown in **Figure 3.1** below, can lift bins with a capacity of up to 4.5 m³. They range in length between approximately 9 m and 11 m and a turning circle of approximately 23 m.



Figure 3.1 Front lift truck

Rear lift trucks, an example of which is shown in **Figure 3.2**, generally have capacity to transport between 6 m³ and 19 m³ of waste. Rear lift trucks may have a height up to 3.3 m, a length up to 10.1 m and turning circle of approximately 15 m.



Figure 3.2 Rear lift truck

3.2. Predicted Traffic Impacts

Operation of the CTT means there is an increase in vehicle movements, potentially resulting in additional risks including:

- Increased traffic volumes and frequency, including heavy vehicles, placing pressure on intersection and road capacities within the vicinity of the site;
- Reduction in road safety as a result of increased number of heavy vehicles operating on the road networks around the CTT;
- Accidents occurring on-site as a result of light and heavy vehicles, trains, container handlers and machinery operating within close proximity; and
- Rail access to and from the site via external rail networks.

As part of DA 205-08-01 MOD 5 modification to increase waste capacity at CTT from 500,00 TPA to 600,000 TPA, a Traffic Impact Assessment (Colston Budd Rogers & Kafes Pty Ltd, 2017) was undertaken as part of the CTT Environmental Impact Statement (EIS) (SG Haddad Advisory, 2017) to assess the potential impacts of the project on traffic and transport. The Traffic Impact Assessment found that the increased throughput of waste would not have an effect on the levels of traffic for any key intersections. The Clyde Marshalling Yards road network has capacity for light vehicles, and the Parramatta Road slip lane can accommodate right hand entry to the Yards. The internal access roads have sufficient capacity to accommodate additional light vehicle movements. Heavy vehicles would remain restricted to Parramatta Road.

4. Traffic Management Measures

4.1. Traffic Mitigation Measures

4.1.1. Approved Entry/Exit

Entering or exiting the CTT site is via a left turn from the slip lane on Parramatta Road, into the sealed right of carriageway. Arrangements have been made with neighbouring users, in regard to traffic sharing on the right of carriageway. 12.5m rigid waste trucks are not permitted to turn right into the site entrance until intersection upgrade works have been completed to the satisfaction of Cumberland Council and Roads and Maritime Services (RMS). Access to the site from Rawson Street is not allowed. No vehicle exiting the development shall turn right onto Parramatta Road.

Every effort will be made to ensure contracts with waste transporters include conditions addressing these entry and exit restrictions and permissible waste transport routes and punitive measures for non-compliances, in accordance with condition 50(g) of the consent.

The CTT services commercial vehicles only, for both Veolia Environmental Services (VES) and contracted customers, so any waste delivered by private vehicles will not be accepted.

Prior to the commencement of construction of the intersection upgrade works, the design of the intersection must be prepared in consultation with and to the satisfaction of Cumberland Council and RMS, and the relevant CoC (c119).

4.1.2. Operation Hours

Operation of the CTT is up to 24 hours, seven days a week, with truck movements peaking in the morning and early afternoon.

The CTT noise levels are to comply with the Environment Protection Authority (EPA) 'intrusiveness' and 'amenity' criteria at the closest residential premises in accordance with the Noise Policy for Industry (EPA, 2017). Noise monitoring at the CTT is undertaken as required and is outlined in the Noise Management Plan (NMP).

Veolia endeavours to ensure the requirements of consent condition 50(g) are satisfied when waste contracts are set up to ensure the collection/transport routes for customers align with the restricted hours for delivery of waste, ensuring vehicle movements, and the subsequent noise emissions are minimised.

This requirement is also communicated to clients through the training and induction program, referred to in **Section 4.2** of the Operation Environmental Management Plan (OEMP).

Any vehicles observed emitting excessive noise during operating hours and CTT's truck noise monitoring program are sent a notification letter informing them of the noise level exceedance. This exceedance is notified to the council and the Planning Secretary (refer to condition 7 of the Consent), recorded in the truck noise level exceedance register, and reported in the Annual Environmental Management Report (AEMR).

4.1.3. Training

A training plan has been developed for the CTT based on Veolia Learning and Development Standard that guides corporate/site specific inductions, competency based licensing requirements for operators, administrative, risk and emergency response training. This is described in **Section 4.2** of the OEMP.

Heavy Vehicle drivers are required to be inducted prior to entering the site. The induction covers all the site rules, weighbridge usage and site transport management procedures.

In accordance with Condition 50(a) & (c), the education program has been developed to ensure all drivers accessing the site are trained in the "left turn only" restrictions and the permitted transport routes in the vicinity of the development. A traffic route plan showing access ways is provided in **Appendix A**. Details regarding this training program are provided in **Section 4.2.2** of the OEMP.

The education program is supported by the following measures:

- Signage posted, advising allowable entry/exit movements as shown in **Appendix A**, and including:
 - Exit to Parramatta Road;
 - Administration areas;
 - Weighbridge; and
 - On Parramatta Road (for "right turn in" movement).
- Instructions from weighbridge staff advising allowable entry/exit movements and transport routes for all vehicles, including:
 - Verbal; and
 - Written advice.
- Regular "toolbox meetings";
- Consideration to be shown to the site's neighbours and their requirements and the agreed arrangements for use of the shared access way is part of the induction; and
- Written advice and updates to all waste transport contractors.

4.1.4. Traffic Congestion Procedure

Traffic congestion is mitigated through design and contract delivery windows. However, in the event that congestion does occur onsite, the following actions will be taken to manage any potential traffic impacts on neighbouring businesses:

- The Facility Manager or Weighbridge Operator will direct the relevant site personnel to assess the scope and/or cause of the congestion.
- Vehicles queued beyond the boundary will be organised so as not to obstruct the traffic movements of neighbouring businesses.
- When possible, vehicles will be moved onto the areas of the Clyde site pending resolution of the problem.
- Should all the above measures fail to relieve congestion or resolve the problem in full causing traffic to bank to the Parramatta Road slip lane, vehicles will be directed away from the site.
- In addition, the Site Manager (or nominee) will contact the waste transporter advising them to cease further deliveries to the site until the problem has been resolved.

4.1.5. Professional Conduct

All waste vehicle drivers must maintain a high level of professional conduct, and as a minimum:

- Adhere to posted speed limits and road signs.
- Use of the horn only as a warning device.
- Road noise impacts are minimised through measures such as driver training for limiting truck compression braking and avoiding use of engine brakes in residential areas. This is detailed further in the Noise Management Plan (NMP) which is found in **Appendix C8** of the OEMP.
- All vehicles to be wholly contained on site before being required to stop
- All loads are to be covered when leaving the site
- Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading past the 'untarping area'
- All vehicles are to be loaded and unloaded only on-site
- Allow enough room between vehicles.
- Respect and be watchful for pedestrians and other drivers on the dedicated transport routes
- Follow instructions given by police, Road and Traffic Authority (RTA) and other authorities.

4.1.6. Workplace Safety

Veolia has the responsibility to ensure that everything reasonably practicable is carried out to reduce the potential risk of injury and environmental harm, to employees, contractors, subcontractors and visitors. All employees, contractors and visitors have a duty to act in a responsible manner and to carry out works in such a way as to prevent injury to themselves and others and also to prevent environmental harm.

Onsite incidents must be reported to a site supervisor/Facility Manager and recorded in Veolia's incident management system. Where an incident is deemed significant, SHEQ are to be contacted to determine if notification to regulators is required.

4.1.7. Driver's Licence Requirements

All Heavy Vehicle Drivers must have the appropriate Drivers Licences and keep it with them at all times, for Veolia Management and relevant authorities upon request.

4.1.8. Drug and Alcohol Policy

A Drug and Alcohol Policy (Policy) has been developed as part of Veolia's Integrated Management System. Under this Policy, it is the responsibility of each employee, contractor and visitor to the site, to ensure that they are not, by consumption of alcohol and or drugs, in such a state as to endanger their own safety at work or the safety of any other person at work.

The Veolia Drug and Alcohol Policy acknowledges that as part of its obligation to provide a safe and healthy working environment; it must address the impact in the workplace of drugs, medication and alcohol on other workers and the public.

A Fitness for Work Procedure applies to all of Veolia's NSW sites, and requires that all employees, contractors and visitors to the site acknowledge that they may be randomly selected to undergo a drug and alcohol test in accordance with this Plan.

5. Traffic Monitoring and Reporting

5.1. Monitoring Program

In accordance with condition 50 (b) & (d) and 119, the following measures are employed to monitor and record the movement of vehicles accessing the site:

- Spot monitoring of vehicle movements by Facility Manager, EMR or Weighbridge Operator;
- Recording of any breaches identified through spot monitoring, through Veolia's issue management system, Rivo; and,
- Reviewing any complaints related to transport routes.

Inspection and monitoring during the operational phase of the CTT will be kept on Veolia's document management system. This will ensure that all monitoring activities will assist to measure the effectiveness of the traffic control measures implemented at the CTT.

The measures detailed in **Table 5.1** are employed to monitor and record the movement of vehicles accessing the site and adherence to the code of conduct:

Table 5.1 TMP Monitoring Program

Parameter	Monitoring Required	Frequency	Criteria / Performance Manager / Trigger	Response
Onsite Truck Routes	Spot Monitoring	Periodically	Onsite blockages or disturbance	Follow up with driver Review of procedures
Non-permitted right-hand turn site entry/exit	Spot Monitoring	Weekly	Upon receipt of complaints, as part of weekly site checklist	Punitive action as outlined in Section 5.3
Traffic Flow	Congestion	As Required	Complaints or Detection	Respond according to result See Section 4.1.4
Driver Management	Spot Monitoring	Periodically	Complaints or Detection	Review of procedures and operations Follow up with driver

Veolia uses monitoring data to review and identify any exceedances against the adopted goals with the appropriate corrective actions applied as discussed below.

Details of compliance reporting requirements are provided in **Section 5.1.2** of the OEMP.

5.2. Performance Reporting and Review

Annual management reviews of the environmental performance of the CTT will assess the continuing suitability, adequacy and effectiveness of the on-site environmental management measures implemented. This review will include performance against the goals of the TMP.

Where performance reporting is required under the COCs or EPL, all relevant information will be recorded and maintained on site. This will include, but not be limited to, the following:

- Sampling dates, times and name of sampler;
- Chain of Custody, analysis and results;
- Complaints received and corrective actions taken; and
- Copy of the EPL, development consent and other relevant approvals.

Veolia will use monitoring data to review and identify any exceedances against the adopted goals with the appropriate corrective actions applied as discussed below.

Details of compliance reporting requirements are provided in **Section 5.1.2** of the OEMP.

5.3. Exceedances and Corrective Actions

Handling of any traffic complaints will be managed in accordance with the process outlined in **Section 4.3.4** of the OEMP. The Facility Manager, or their site nominee, will record and manage all complaints in accordance with Veolia's complaints handling, notification and reporting procedures.

Any traffic related incidents will be managed in accordance with Veolia's Incident Management Standard. Investigations, where required, will be undertaken as per the same standard on a case by case basis depending on the severity of the incident as described in **Section 5.1.1** of the OEMP.

Notification, emergency response and reporting requirements relating to incidents are detailed in **Section 4.4** of the OEMP, as well as detailed in the CTT Pollution Incident Response Management Plan (PIRMP).

At completion of any investigation, any corrective actions required will be recorded in Rivo and managed in accordance with the Continual Improvement Procedure in a timely manner as described in **Section 5.1.1** of OEMP.

In accordance with condition 50(e), an induction and follow up program is in place for drivers to ensure compliance with traffic restrictions under the COCs, as outlined in the following table.

Offence	Corrective/punitive Action
Initial	Verbal warning directly to driver (where possible) and written warning to driver's employer.
Repeat	Induction refresher training undertaken with driver and final written warning issued to driver's employer.
Final	Notification to driver supervisor/manager and/or refused entry to site.

While the right hand turn into the CTT from Parramatta Road is a legal turn permitted by Transport NSW, the COCs have not permitted this historically. A modification application was sought and approved for the modification of Condition 119. Road works have been planned in consultation with DPIE, Transport NSW and Cumberland Council to implement safety improvements before right hand turns for waste delivery vehicles can commence.

5.4. Publishing of Monitoring Data

Where required, Veolia publishes the results of any environmental monitoring required under the EPL on the following website:

<https://www.veolia.com/anz/about/about-veolia/operational-compliance/nsw-monitoring-reports>

References

Document Name
Maunsell McIntyer (2001a). <i>Clyde Transfer Terminal Environmental Impact Statement</i> , Maunsell McIntyer Pty Ltd. August 2001.
Maunsell (2001b). <i>Clyde Transfer Terminal Supplementary Environmental Impact Statement</i> , Maunsell Australia Pty Ltd. December 2001.
NSW EPA (2017). <i>Noise Policy for Industry</i> , NSW Environmental Protection Authority. 2017.
Kolston Budd Rogers (2017). <i>Traffic Report for Proposed Modification of DA 205-08-01 - Clyde Waste Transfer Terminal</i> , Kolston Budd Rogers Pty Ltd 2017

Appendix A - Traffic Route Plan

