



Shoalhaven Starches Expansion Project (Modification 28)
Operational Traffic Management Plan
for
Manildra Group

Document Control

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Revision History

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1 Introduction

1.1 Overview

Modification 28 (**MOD 28**) to the current Shoalhaven Starches Expansion Project Approval MP06_0228 (**SSEP Approval**) was recently approved by the Department of Planning & Environment (**DPE**). MOD 28 provides for the construction and operation of temporary grain storage bunker (the **grain bunker**) at the Shoalhaven Starches Environmental Farm (the **Farm**) located in Hanigans Lane, Bomaderry, during periods when rail services to the broader Shoalhaven Starches Site (the **SS Site**) are disrupted.

The grain bunker will have capacity for 30,000t of grain, and be filled by **inbound trucks** (carrying grain) directly from producers across western NSW. The stored grain would then be transferred from the Farm to the SS Site by Shoalhaven Starches trucks (**transfer trucks**) as required to ensure production is not impacted.

Further details in regard to MOD 28 are provided in the broader Statement of Environmental Effects (**SEE**) which accompanied the MOD 28 submission to DPE.

1.2 Operational Traffic Management Plan

Conditions 35E and 35F in Schedule 3 of the **MOD 28 Approval** (dated 20 June 2023) requires the preparation of an Operational Traffic Management Plan (**OTMP**) prior to the use of the grain bunkers, and then be implemented through the life of MOD 28. In this regard, Condition 35E and 35F state the following:

35E. Prior to the commencement of operation of the Temporary Emergency Grain Storage Bunker approved under MOD 28, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the life of MOD 28 to the satisfaction of the Planning Secretary. The OTMP must:

- (a) be prepared by a suitably qualified and experienced person(s);*
- (b) be prepared in consultation with Council;*
- (c) detail the measures that are to be implemented to ensure road safety and network efficiency;*
- (d) detail heavy vehicle routes, access, and parking arrangements;*
- (e) identify the trigger points for the use of the Temporary Emergency Grain Storage Bunker;*
- (f) detail the controls and measures to be implemented to prevent simultaneous heavy vehicle movements to existing approved operation heavy vehicle movements on Bolong Road; and*
- (g) identify time restrictions for heavy vehicle movements on Bolong Road outside of peak traffic time.*

35F. The Applicant must:

- (a) not commence operation of MOD 28 until the Operational Traffic Management Plan required by condition 35E is approved by the Planning Secretary; and*

(b) implement the most recent version of the Operational Traffic Management Plan approved by the Planning Secretary for the duration of MOD28 operations.

arc traffic + transport has been engaged by Shoalhaven Starches to prepare the OTMP in accordance with the requirements of Conditions 35E and 35F; we are suitably qualified and experienced in the preparation of traffic and transport assessments for more than 30 years, including the Transport Assessment that accompanied the MOD 28 submission to DPE (**MOD 28 TA**).

It is noted from the outset that the OTMP is to be regularly reviewed by Manildra to ensure that the management strategies and protocols detailed herein continue to provide for the safe and efficient operation of the grain bunkers. Any deviations or other from these strategies and protocols would necessarily be addressed in future revisions of the OTMP, the latest version of which would be provided to DPE for approval.

A summary response to each of conditioned requirements, and the section of this OTMP where each is addressed in further detail, is provided in [Table 1](#).

Table 1: Transport for NSW Assessment Requirements

MOD 28 Approval Condition #	Condition	OTMP Reference
35E.	<i>Prior to the commencement of operation of the Temporary Emergency Grain Storage Bunker approved under MOD 28, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the life of MOD 28 to the satisfaction of the Planning Secretary. The OTMP must:</i>	This OTMP
(a)	<i>be prepared by a suitably qualified and experienced person(s);</i>	Section 1.2
(b)	<i>be prepared in consultation with Council;</i>	Section 1.3
(c)	<i>detail the measures that are to be implemented to ensure road safety and network efficiency;</i>	Section 3.5
(d)	<i>detail heavy vehicle routes, access, and parking arrangements;</i>	Section 3.1 Section 3.6
(e)	<i>identify the trigger points for the use of the Temporary Emergency Grain Storage Bunker;</i>	Section 2.3
(f)	<i>detail the controls and measures to be implemented to prevent simultaneous heavy vehicle movements to existing approved operation heavy vehicle movements on Bolong Road; and</i>	Section 3.4
(g)	<i>identify time restrictions for heavy vehicle movements on Bolong Road outside of peak traffic time.</i>	Section 3.3
35F	<i>The Applicant must:</i>	
(a)	<i>not commence operation of MOD 28 until the Operational Traffic Management Plan required by condition 35E is approved by the Planning Secretary; and</i>	Noted
(b)	<i>implement the most recent version of the Operational Traffic Management Plan approved by the Planning Secretary for the duration of MOD28 operations.</i>	Noted

1.3 Shoalhaven City Council Consultation

With reference to Condition 35E(b), arc traffic + transport has consulted with Shoalhaven City Council (**Council**) during the preparation of the OTMP; this included the submission of a Draft OTMP for Council's consideration. Further to their review of the Draft OTMP, correspondence dated 9/10/2023 (attached as **Appendix A**) states in part the following:

Council is generally satisfied as to the contents of the draft OTMP; however, more detail should be provided as to the triggers for the filling of the grain bunker and the export of the grain from it.

Council believes the following information would be important in understanding the operational traffic relating to the bunker:

- *What is the typical use rate of grain during Shoalhaven Starches operation, e.g. tonnes per day? How long would it take to draw down the grain within the bunker when it is reaching expiry?*
- *Clarify whether it is intended to maintain the supply at 100% capacity in preparedness for a rail disruption, i.e. whether importation is to start immediately, or if it is intended to leave it empty and rapidly fill it when the risk of a disruption is high e.g. prior to forecast severe storms. The plan currently appears to foreshadow both scenarios.*
- *Clarify that grain will not be exported from the bunker in an ongoing manner over time when rail disruptions are not occurring, and the movements associated with export that needs to occur when the stored grain is close to expiry and needs to be used.*

In response to these additional questions, correspondence was prepared by Manildra dated 26/9/2023 and submitted to Council; a copy of this correspondence is also provided in Appendix A, but provides clarification of the issues raised by Council, stating:

1. *What is the typical use rate of grain during Shoalhaven Starches operation, e.g. tonnes per day?*
3,300 T/day.
2. *How long would it take to draw down the grain within the bunker when it is reaching expiry?*
Estimated the bunker would hold 2 weeks' worth of grain for the mill.
3. *Clarify whether it is intended to maintain the supply at 100% capacity in preparedness for a rail disruption, i.e. whether importation is to start immediately, or if it is intended to leave it empty and rapidly fill it when the risk of a disruption is high e.g. prior to forecast severe storms. The plan currently appears to foreshadow both scenarios.*
We would like to fill the bunker up and leave there until rail emergency, then we would out-turn the bunker when this would accrue with rail.
4. *Clarify that grain will not be exported from the bunker in an ongoing manner over time when rail disruptions are not occurring, and the movements associated with export that needs to occur when the stored grain is close to expiry and needs to be used.*

This statement is correct, only when rail is down and at the expiry of the wheat.

Subsequent to the submission of this additional information to Council, no further correspondence was received.

1.4 Reference Documents

1.4.1 Shoalhaven Starches Reports

arc traffic + transport has prepared numerous reports relating to the SS Site and the Farm, which have been referenced in the preparation of the OTMP; these include:

- MOD 28 TA;
- Shoalhaven Starches Modification 28 Transport Assessment August 2022 (**MOD 26 TA**);
- Shoalhaven Starches Environmental Farm Traffic Assessment August 216 (**Farm TA**).

1.4.2 Transport Guidelines & Controls

The OTMP also references key guidelines and controls relevant to the assessment of the access, traffic and parking characteristics of the MOD 28 operations; these include:

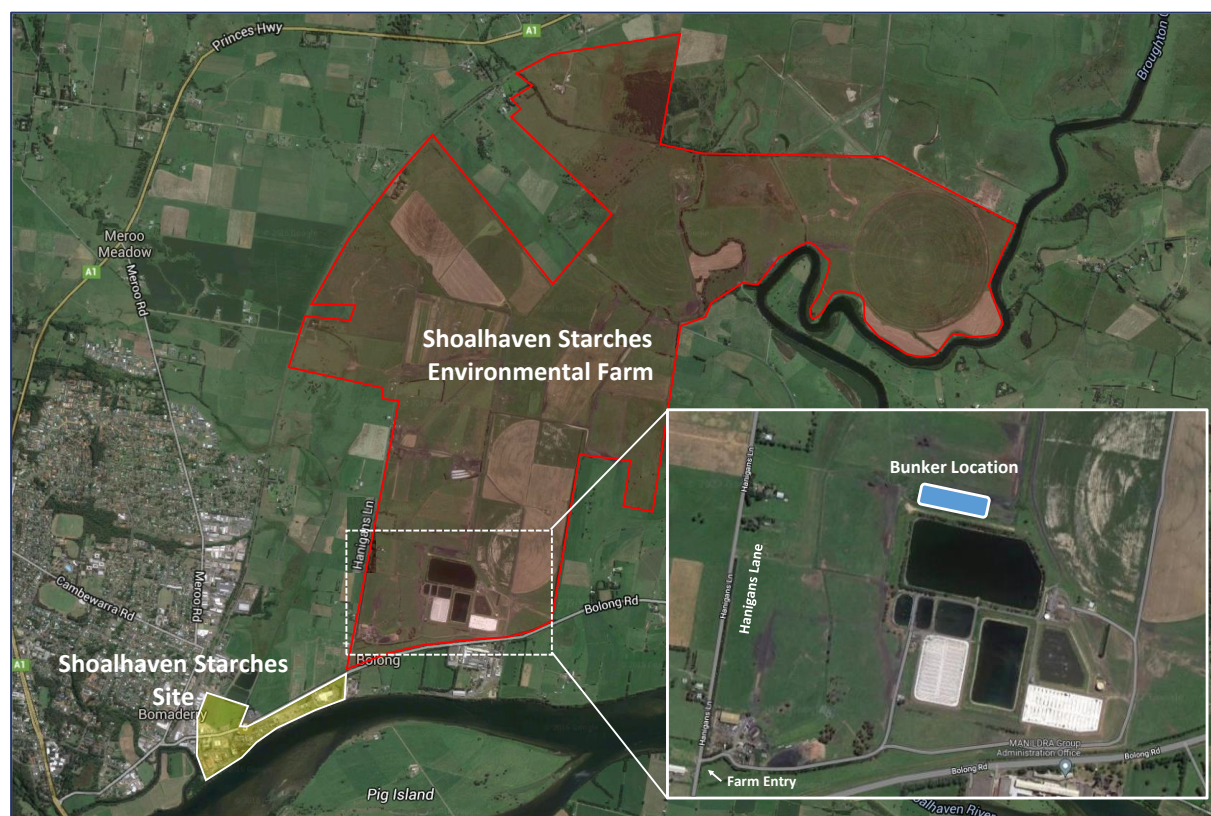
- Roads & Traffic Authority Guide to Traffic Generating Developments 2002 (**RTA Guide**);
- Austroads Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (**GTM Part 12**);
- Australian Standard 2890.1: Parking Facilities – Off Street Car Parking (**AS 2890.1**); and
- Australian Standard 2890.2: Parking Facilities – Off Street Commercial Vehicle Facilities (**AS 2890.1**).

2 The MOD 28 Approval

2.1 Location

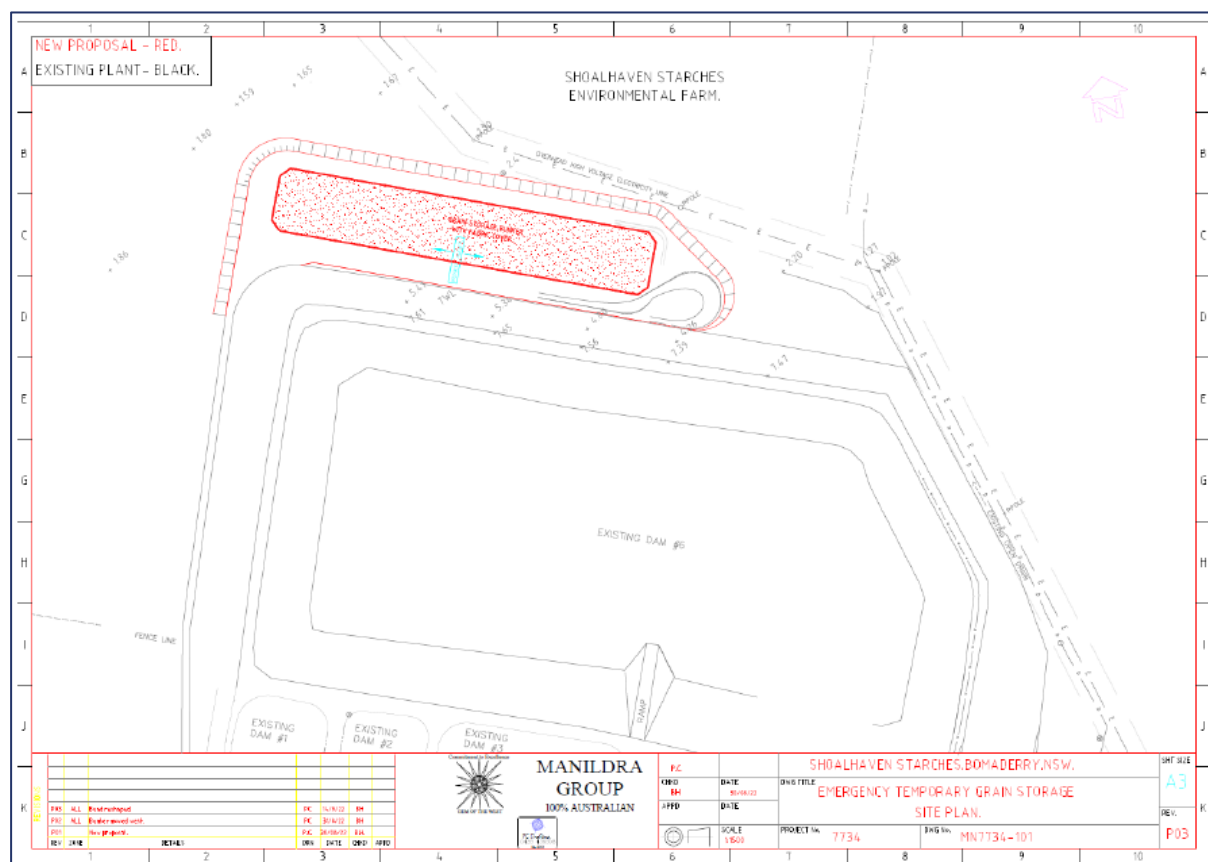
The location of the Farm, and the grain bunker within the Farm, is shown in Figure 1, and a more detailed plan of the grain bunker is provided in Appendix 2Y of the MOD 28 Approval, reproduced in Figure 2.

Figure 1: The Farm and Bunker Location



Source: MOD 28 TA

Figure 2: The Grain Bunker



Source: MOD 28 Approval

2.2 MOD 28 Overview

The MOD 28 Approval provides for the temporary grain storage capacity during periods when rail services to the broader SS Site are disrupted, as has been the case in recent years during periods of bad weather. The grain bunker will have capacity for 30,000t of grain, and be filled by inbound trucks (carrying grain) directly from producers across western NSW. The stored grain would then be transported from the Farm to the SS Site as required to ensure production is not impacted.

2.3 Grain Bunker Operational Triggers

From an operational perspective, once Manildra becomes aware of impending rail service disruptions, they will contact their grain suppliers and organise for grain to be transport to the Farm by road transport (inbound trucks). While most disruptions are – based on recent history – relatively short, in some instances the transport of grain by inbound trucks would be required to both fill the grain bunker, and then be topped up as required.

Once rail services were again available, the grain bunker could be filled over a longer period of time, i.e. months.

2.4 MOD 28 Operational Timeframe

Importantly, Condition 3 of the MOD 28 Approval provides for the grain bunker to operate (when required) for a period of 36 months only; this reflects the approval, construction and operational timeframe of other Modifications that are currently being prepared by Manildra and/or assessed by DPE.

Modification 25 (**MOD 25**) provides for an extension of the rail line within the SS Site to allow additional on-site standing area so that trains longer than 900m can be entirely accommodated on-site. It is our understanding that the MOD 25 SEE has recently been provided to DPE for review prior to formal lodgement of MOD 25, and moreover that MOD 25 would resolve many of the rail disruption issues that have occurred in recently years.

In addition, Modification 26 (**MOD 26**) provides for the construction of additional grain storage and handling facilities at the former Dairy Farmers site (**DF Site**) in Bolong Road east of the SS Site, i.e. grain could be stored within the DF Site, and in turn does not require the use of transfer trucks (or indeed the approved Farm grain bunker).

It is anticipated however that MOD 26 (and MOD 25) will take at least 2 years to be approved, constructed and then commissioned, and as such would not be able to address the more imminent concern that forecast weather patterns will potentially have to the Shoalhaven Starches operations before the Mod 26 project is able to be commissioned.

Should the grain bunker be required to operate for more than 36 months, Manildra would necessarily be required to obtain additional approvals to MOD 28.

3 Operational Traffic Management

3.1 Truck Access Routes

3.1.1 Inbound Truck Access Route

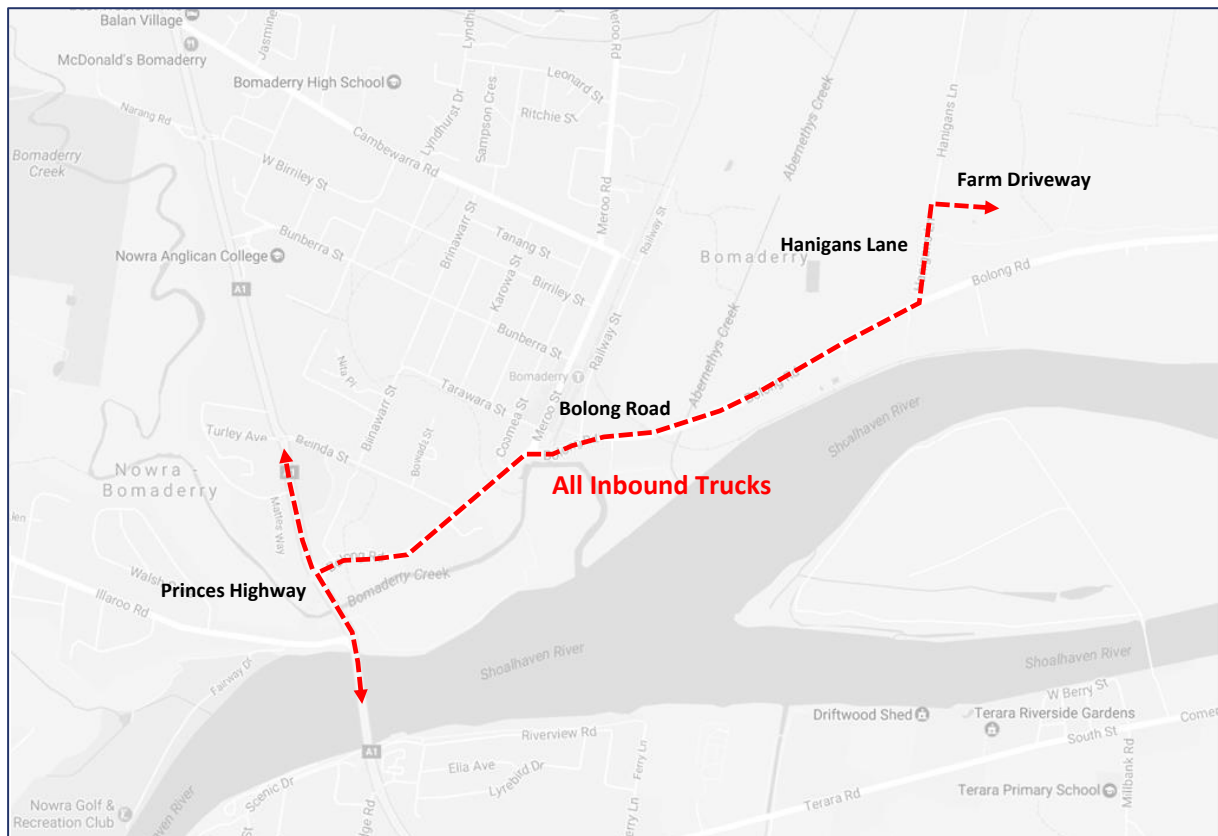
Inbound truck access to the grain bunker will be via Bolong Road and the existing Farm driveway in Hanigans Lane north of Bolong Road.

Upon entering the Farm, inbound trucks will travel north via the existing internal road to the grain bunker location, where they will be unloaded using a mobile Grainline Auger which will convey the grain from inbound trucks into the stockpile within the bunker. A new 13m wide access road will be constructed of compacted road base around the perimeter of the storage bund (surrounding the grain bunker) to enable two-way access by semi-trailers.

All inbound trucks (further to unloading) will then depart the Farm from the existing driveway to Hanigans Lane, and then turn right to Bolong Road to access Princes Highway and in turn the regional road network; no inbound trucks are permitted to travel in Bolong Road east of Hanigans Lane.

The inbound truck route is shown in Figure 3, and will also be included in the Drivers Code of Conduct (see also Section 4.4).

Figure 3: Inbound Truck Access Route



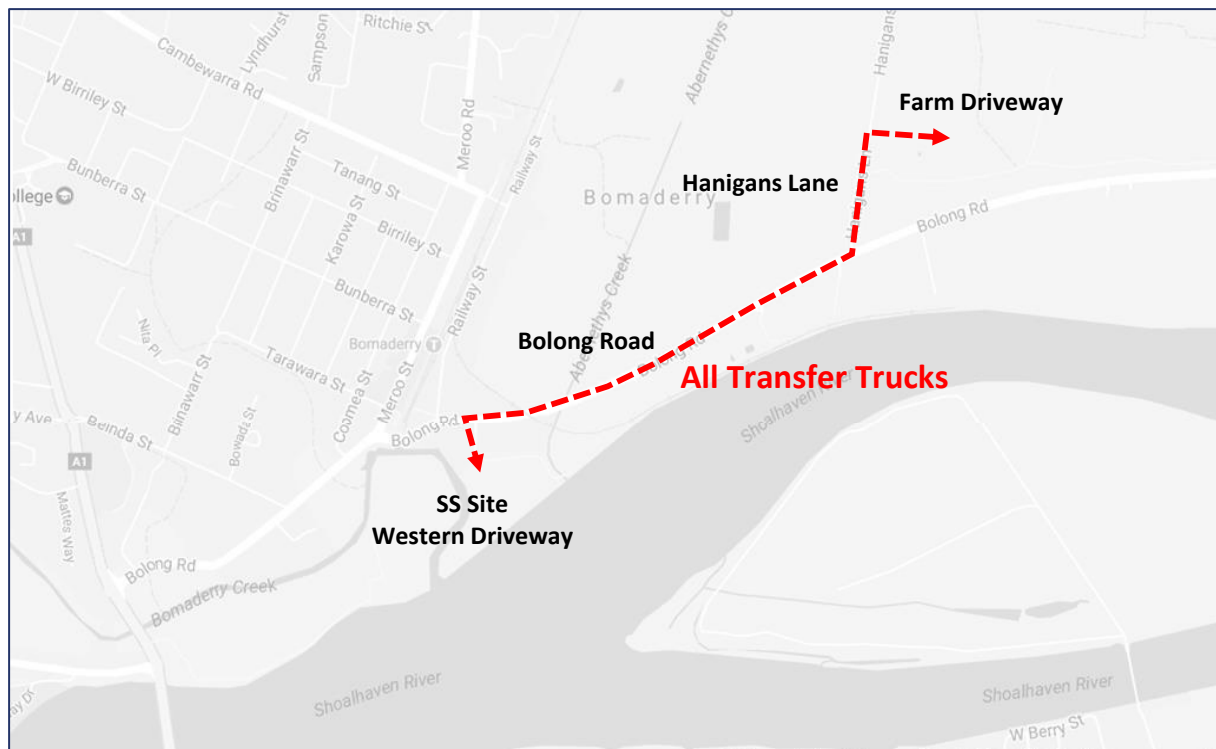
Source: Google

3.1.2 Transfer Vehicle Access

Transfer trucks (operated by Manildra) will – as with coal and woodchip transfer vehicles operating from the Farm – loop between the SS Site (at the Western Driveway) and the Farm’s existing driveway using Bolong Road and Hanigans Lane only; no transfer trucks are permitted to travel in Bolong Road east of Hanigans Lane.

The transfer truck route is shown in Figure 4, and will also be included in the Drivers Code of Conduct (see also Section 4.4).

Figure 4: Transfer Truck Access Route



Source: Google

3.2 MOD 28 Truck Movements in Bolong Road

3.2.1 Inbound Truck Trips

As detailed in the MOD 28 TA, the 30,000t storage capacity of the grain bunker would require a total of approximately 1,000 trucks (i.e. with an average carrying capacity of 30t) to fill; this could occur over a relatively short period of 4 weeks, coinciding with rail services being unavailable at relatively short notice.

Under these worst case conditions, i.e. where the grain bunker needs to be filled in this short period, the MOD 28 TA estimates that 8 inbound truck trips (i.e. 4 inbound trucks arriving and 4 inbound trucks departing) could be generated in an operational peak hour. This equates to 1 inbound truck trips every 7 – 8 minutes which would have no impact on the operation of the local road network.

3.2.2 Transfer Truck Trips

While the grain bunker could be filled in a relatively short period, the transfer of grain to the SS will be undertaken over a longer period as required, and occur over the full 24 hours of each day the shift nature of SS Site operations. As transfer trucks will have the same general capacity as inbound trucks, the MOD 28 TA determined that transfer truck trips generation would be no more than 2 transfer truck trips in an operational peak hour.

Again, these transfer truck trips would have no impact on the operation of the local road network.

3.3 Truck Trips in Commuter Peak Periods

While the SSEP Approval provides for broader SS Site and MOD 28 truck movements to occur 24 hours a day, 7 days a week, Condition 35E(g) of the MOD 28 Approval requires that the OTMP *identify time restrictions for heavy vehicle movements on Bolong Road outside of peak traffic time*.

With regard to inbound trucks, the potential to limit these movements during commuter peak periods is very limited as a factor of the distance for the majority of inbound truck trips from regional NSW, and in turn the impracticability of specifically scheduling these inbound truck trips so as not to be generated during commuter peak periods.

However, the movements of transfer trucks can be scheduled by Manildra; in this regard, transfer truck trips will be restricted from occurring during the commuter peak periods, being 7:00am – 9:00am and 4:00pm to 6:00pm to the extent practicable.

It is noted that to achieve this restriction of transfer trucks in the commuter peak periods, the potential exists for additional transfer truck trips to occur at other time of the day. However, if this is the case, transfer truck trips would still generate only 3 – 4 trips in an off-peak hour, which again would have no impact on the operation of the local road network.

Finally, it is important to note that while there may be some periods when the grain bunker will be filled in a relatively short period of time, outside of these periods Manildra will be able to monitor the amount of product in the grain bunker and return it to capacity over a much longer period, potentially being months and months, when rail operations are not impacted.

3.4 Simultaneous Truck Trips

3.4.1 Inbound Trucks

While it is again noted that the SSEP Approval provides for broader SS Site and MOD 28 truck movements to occur 24 hours a day, 7 days a week, Condition 35E(f) of the MOD 28 Approval requires that the OTMP *detail the controls and measures to be implemented to prevent simultaneous heavy vehicle movements to existing approved operation heavy vehicle movements on Bolong Road*.

With regard to inbound trucks, the distances that they are travelling in this instance provides a benefit in spreading the arrival of inbound trips, i.e. inbound trucks are departing from locations across regional NSW at different times of the day, and as such the potential for more than 1 inbound truck to be arriving at/departing from the Farm at any one time is minimal.

Manildra has also committed to monitoring inbound truck movements through the life of the MOD 28 operations, with a particular focus on arrival times. Noting that Manildra operational staff are in contact with all inbound truck drivers, should the potential for more than 1 or 2 inbound trucks to be arriving at the same time occur, the inbound truck drivers will be instructed to delay their arrival (by – for example – using one of the Princes Highway rest areas north of Bomaderry).

3.4.2 Transfer Trucks

With regard to transfer truck trips, these would most commonly be occurring after the grain bunker has reached (or is nearing) capacity, and as such would not occur at the same time as inbound truck trips.

In addition, Manildra has committed to transfer truck trips during periods when inbound truck trips are minimal, and by operating transfer trucks during later even and early morning periods when it is anticipated that there would be very few inbound truck trips.

3.4.3 SS Site Trucks

SS Site truck trips are generated 24 hours a day, 7 days a week. With reference to 24 hours survey data collected for past SS Site assessments, the majority of these truck trips occurring in clusters during the early morning (prior to the commuter peak period) and later evening when, again, the potential for inbound truck trips to be occurring is very low.

It is also important to note that the SS Site does not generate a significant number of larger truck trips, i.e. articulated vehicles or B-Doubles; the 24 hour survey data again indicates that on most days less than 6 larger truck trips are generated by the SS Site.

Again therefore, the potential for inbound truck trips to be generated at the same time as SS Site truck trips is low.

3.5 Road Network Conditions

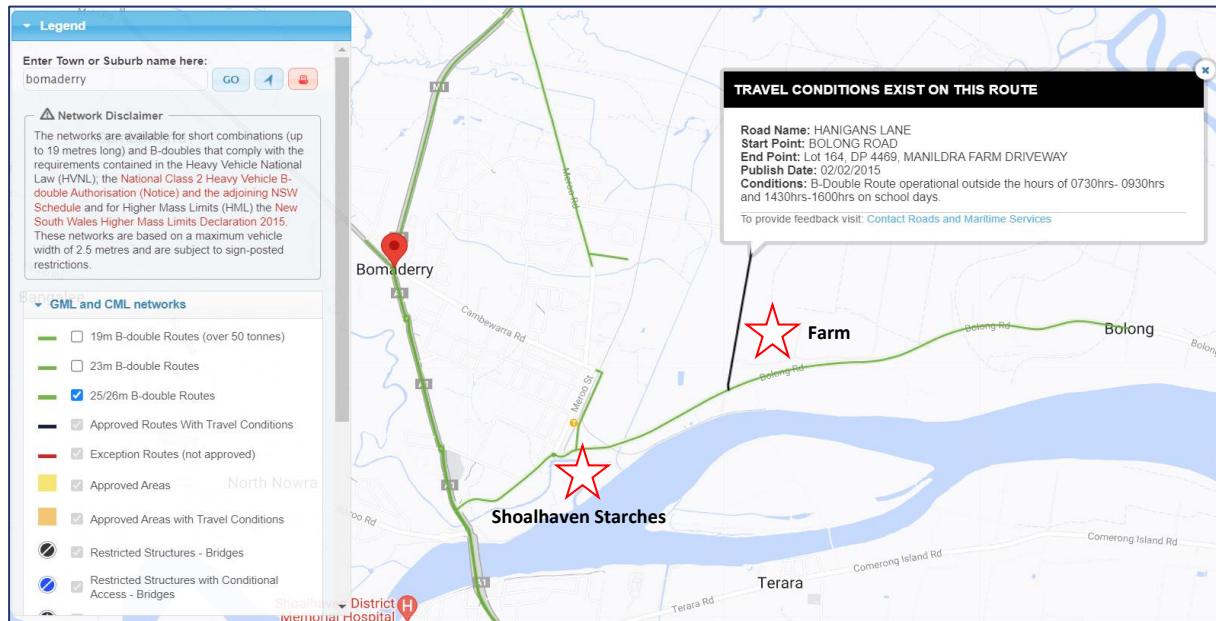
3.5.1 Road Safety

With reference to Condition 35E(c), the road network currently operates with a high level of safety.

The speed limit in Bolong Road from east of the Hanigans Lane intersection and through to Princes Highway is 60km/h, noting that this speed limit was reduced in recent years in part further to the expansion of Manildra operations to sites east of the main SS Site, including the old Dairy Farmers Site.

Bolong Road (from east of Hanigans Lane intersection and through to Princes Highway) is an approved Restricted Access Vehicle (**RAV**) route providing for vehicles up to and include 26m B-Doubles, as is Hanigans Lane past the Farm driveway; these approved RAV routes are shown in [Figure 5](#).

Figure 5: Restricted Access Vehicle Routes



Source: TfNSW

With reference to Figure 5, it is noted that a RAV operating condition in Hanigans Lane stipulates that no B-Doubles are permitted to travel during school peak periods. However, the MOD 28 operations will not generate any trucks larger than a General Access Vehicle (**GAV**), and as such these vehicle movements would not be subject to these operating conditions.

Notwithstanding, it is important to note that RAV routes are only approved further to assessment by TfNSW, the National Heavy Vehicle Regulator (**NHVR**) or Council (as delegates) to ensure that these routes – including roads and intersections – are appropriate to the movement of the largest vehicles permitted to use them.

This means that the geometry, sight distances and overall safety of these roads and intersections has been determined to be appropriate for the movement of RAVs larger than the vehicles that will actually be generated by the MOD 28 operations.

Finally, a review of 2017 – 2021 crash data available from TfNSW's Centre for Road Safety also indicates only a single truck crash in Bolong Road in the vicinity of the SS Site and Farm, which occurred in 2019 that resulted in a moderate injury.

The Road User Movement (**RUM**) code for this crash was 37, which indicated a side swipe, but it is not known whether the truck or other vehicle driver was at fault; based on our discussions with Manildra, and moreover their excellent record keeping of all staff and driver incidents, the crash did not involve a Manildra related truck.

3.5.2 Road Network Efficiency

As detailed in the MOD 28 TA, the road network operates efficiently, with key site and sub-regional intersections operating at an appropriate Level of Service, and all roads providing appropriate spare capacity.

In recent years, the TfNSW upgrade of Princes Highway from Gerringong to Bomaderry has significantly reduced traffic volumes in Bolong Road by providing more efficient travel times via Princes Highway rather than the *Sandtrack*, which includes Gerroa Road Bolong Road. Based on our discussions with TfNSW as part of past assessments, these reductions in traffic volumes along the Sandtrack are expected to continue further to the completion of the Shoalhaven River bridge upgrade.

Along with these Princes Highway upgrades, key intersections at SS Site access points have also been upgraded over many years to provide additional turn lane treatments and better alignment, which again provides additional capacity in Bolong Road and at these intersections.

In summary, the road network operates with appropriate capacity during all peak periods and the trips generated during the MOD 28 operation period would have no significant impact on these existing road network conditions.

3.6 Additional Issues

3.6.1 Loading/Unloading

All unloading and loading of grain will occur fully within the Farm and SS Site; no unloading (or general truck parking or queuing) would occur in either Hanigans Lane or Bolong Road. There is also very significant queuing capacity on the approach to the grain bunker unloading area such that there is no potential for any inbound truck queue to extend to Hanigans Lane at any time.

3.6.2 Weighing

While many of the trucks delivering general materials to the broader SS Site are required to utilise the weighbridge within the SS Site so as to determine the amount of material being delivered, under the OTMP all inbound trucks travelling to the Farm will be weighed at their origin; this will reduce the number of additional movements that would result from inbound trucks weighing in at the SS Site on arrival and departure.

3.6.3 Parking

There is no expectation of any additional staff or truck parking to be generated by the MOD 28 operations, with all operations to be supervised by existing Manildra staff. Notwithstanding, if any additional parking demand was generated at the Farm, there is significant spare parking capacity if required.

4 Operational Traffic Management

4.1 On-Site Management

4.1.1 Staff Parking

There is no expectation of the MOD 28 operations generating any significant additional staff parking demand, but any such demand could be easily provided for within the Farm.

4.1.2 Deliveries & Materials Handling

All deliveries and grain handling will occur within the Farm or within the SS Site at all times.

4.2 Designated Truck Routes

4.2.1 Inbound Trucks

All inbound truck access to the grain bunker will be via Bolong Road and the existing Farm driveway in Hanigans Lane north of Bolong Road.

Upon entering the Farm, inbound trucks will travel north via the existing internal road to the grain bunker location, where they will be unloaded using a mobile Grainline Auger which will convey the grain from inbound trucks into the stockpile within the bunker. They will then depart the Farm via the existing Farm driveway to Hanigans Lane, and then turn right to Bolong Road to access Princes Highway and in turn the regional road network; no inbound trucks are permitted to travel in Bolong Road east of Hanigans Lane.

The inbound truck route (vehicle movement plan) is provided in [Appendix B](#).

4.2.2 Transfer Trucks

Transfer trucks will loop between the SS Site at the Western Driveway and the Farm's existing driveway using Bolong Road and Hanigans Lane only; no transfer trucks are permitted to travel in Bolong Road east of Hanigans Lane.

The transfer truck route (vehicle movement plan) is shown in [Appendix B](#).

4.3 Operational Responsibilities

4.3.1 Truck Movements

Manildra and grain transporters will be required to take all steps necessary to ensure all trucks, and truck movements, are as safe as possible, and will not result in truck drivers operating under conditions that are unsafe. This will be achieved by undertaking the following:

- Ensuring all trucks are well maintained and that the equipment enhances driver, operator and passenger safety to as great an extent as practicable;

- Ensuring all truck drivers have a valid Verification of Competency for the class of vehicle they are driving;
- Identifying truck driver training needs and arranging appropriate training or re-training. This is anticipated to include truck driver competency assessments as part of all inductions, and regular Toolbox Talks on safety conditions, managing fatigue, approved truck routes and truck driver responsibilities; and
- Encouraging safe driving behaviour by not covering or re-imbursing staff speeding or other infringement notices; ensuring the legal use of mobile phones only while driving; and providing training on, and circulating information about, travel planning and efficient truck driving habits.

4.3.2 OTMP Monitoring and Review

The development of a program to monitor the effectiveness of the OTMP will also be established by Manildra, and may be subject to revisions to further enhance the safety and efficiency of the MOD 28 operations. Any and all reviews will be documented by Manildra, with considerations for review potentially including the following:

- Tracking inbound truck and transfer truck movements against estimated volumes;
- Identifying any shortfalls in the existing OTMP, and developing an updated action plan to address issues that may arise during MOD 28 operations (for example, a higher number of inbound truck movements in a shorter period of time than anticipated); and/or
- Undertaking regular checks to ensure all loads are arriving at and leaving the Farm appropriately covered and without tracking materials off-site.

4.4 Drivers Code of Conduct:

4.4.1 Drivers Code of Conduct Objectives

Further to the above, a Drivers Code of Conduct (**Drivers COC**) will be prepared and provided to all truck drivers accessing the Site; all inbound truck drivers will be required to adhere to the Manildra Drivers COC and the Drivers COC developed by the grain transport companies themselves.

The objectives of the Drivers COC include:

- Minimising the impact of truck movements on the on-site environment and local road network;
- Minimising conflict with other on and off-site road users;
- Minimising truck traffic noise; and
- Ensuring truck drivers use the designated truck routes (as detailed in [Section](#)).

The Drivers COC will also require that, while driving any truck, drivers must:

- Demonstrate safe driving and road safety activities;
- Abide by traffic and road legislation; and
- Follow relevant on-site signage and instructions at all times.

4.4.2 Breach of Drivers Code of Conduct

The following activities by any truck driver would be considered as a breach of the Drivers COC:

- Reckless or dangerous driving causing injury or death;
- Driving whilst disqualified or not correctly licensed;
- Drinking or being under the influence of drugs while driving;
- Failing to stop after an incident;
- Loss of demerit points leading to suspension of licence;
- Any actions that warrant the suspension of a licence; and/or
- Exceeding the speed limit in place on any permanent or temporary roads.

Any drivers found to be in breach of the Drivers COC would be notified of the breach, as would their immediate managers, who would in turn be required to provide additional training/guidance to the driver. Any repeat offenders would be prevented from returning to the Farm and/or SS Site.

4.4.3 Driver Responsibilities

All truck drivers must:

- Be responsible and accountable for their actions;
- Ensure they have a current driver licence for the class of vehicle they are driving, and this licence is to be carried with them at all times;
- Immediately notify their manager if their drivers licence has been suspended, cancelled, or has had limitations applied;
- Comply with all traffic and road legislation when driving;
- Regularly check the operating condition of their truck;
- Not drive along routes other than the designated truck routes;
- Never drive under the influence of alcohol or drugs;
- Wear a safety seat belt at all times when in the vehicle;
- Report any near-misses, crashes or scrapes to their manager, including those that do not result in injury;
- Report infringements to a manager at the earliest opportunity;
- Report truck defects to a manager prior to the next use of the vehicle; and
- Keep loads covered at all times (where relevant).

4.4.4 Crash or incident Procedure

In the event of a crash or other traffic incident, the truck driver is required to:

- Stop the vehicle as close to it as possible to the scene, making sure this not hindering traffic;
- Ensure one's own safety first, then help any injured people and seek assistance immediately if required;

- Ensure that key information is exchanged with the other driver, including the registration, names and insurance details of other vehicles/drivers;
- Ensure that the police are contacted should there be a disagreement over the cause of the crash, if there are injuries or if property is damaged; and
- As soon as reasonably practical, report all details gathered to the relevant manager.

Appendix A: Shoalhaven City Council Correspondence

Correspondence, arc traffic + transport to Shoalhaven City Council 16/08/2023

Shoalhaven Starches MOD 28 Operational Traffic Management Plan



Anton Reisch <antonreisch@optusnet.com.au>
To 'andre.vernez@shoalhaven.nsw.gov.au'
Bcc 'Simone Arnold'; 'John Studdert'; 'Brian Hanley'; 'Jacob Wooden'

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Wed 16/08/2023 3:43 PM



Good afternoon Andrew, trust you and yours are very well!

Per the Conditions of Consent for the Shoalhaven Starches MOD 28 approval (temporary grain bunker) we have prepared a Draft Operational Traffic Management Plan, which is attached. Also per the Conditions, I am hoping that you (or the relevant officer) might have the opportunity to review the Draft OTMP and provide any additional comments so that we can revise if required and finalise before submitting to the Department.

Would appreciate it muchly if you could acknowledge receipt of this email, and of course if you require any additional information or would like to discuss anything further, please don't hesitate to get in touch!

anton



anton reisch. director
m. +61 427 995 160
a. 19 canoon road, south turramurra, NSW 2074
e. antonreisch@optusnet.com.au
w. www.arctt.com.au

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Correspondence, Shoalhaven City Council to arc traffic + transport 20/09/2023

RE: Shoalhaven Starches MOD 28 Operational Traffic Management Plan



Andre Vernez <Andre.Vernez@shoalhaven.nsw.gov.au>
To: Anton Reisch
Cc: Harry Brizga; Jonathan Ash

 You replied to this message on 9/10/2023 12:59 PM.

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Wed 20/09/2023 2:51 PM

Good afternoon Anton,

Council is generally satisfied as to the contents of the draft OTMP; however, more detail should be provided as to the triggers for the filling of the grain bunker and the export of the grain from it.

Council believes the following information would be important in understanding the operational traffic relating to the bunker:

- What is the typical use rate of grain during Shoalhaven Starches operation, e.g. tonnes per day? How long would it take to draw down the grain within the bunker when it is reaching expiry?
- Clarify whether it is intended to maintain the supply at 100% capacity in preparedness for a rail disruption, i.e. whether importation is to start immediately, or if it is intended to leave it empty and rapidly fill it when the risk of a disruption is high e.g. prior to forecast severe storms. The plan currently appears to foreshadow both scenarios.
- Clarify that grain will not be exported from the bunker in an ongoing manner over time when rail disruptions are not occurring, and the movements associated with export that needs to occur when the stored grain is close to expiry and needs to be used.

Regards,



Andre Vernez
Senior Development Planner


Bridge Road (PO Box 42) Nowra NSW 2541
shoalhaven.nsw.gov.au

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RE: Shoalhaven Starches MOD 28 Operational Traffic Management Plan



SA Simone Arnold <Simone.Arnold@manildra.com.au>
To: Andre.Vernez@shoalhaven.nsw.gov.au
Cc: Anton Reisch; 'Harry Brizga'; 'Jonathan Ash'

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Mon 9/10/2023 11:48 AM

From: Simone Arnold

Sent: Tuesday, September 26, 2023 8:42 AM

To: andre.vernez@shoalhaven.nsw.gov.au

Cc: Anton Reisch <antonreisch@optusnet.com.au>; 'Harry Brizga' <Harry.Brizga@shoalhaven.nsw.gov.au>; 'Jonathan Ash' <Jonathan.Ash@shoalhaven.nsw.gov.au>

Subject: FW: Shoalhaven Starches MOD 28 Operational Traffic Management Plan

Good afternoon Andre,

Please see responses below:

1. What is the typical use rate of grain during Shoalhaven Starches operation, e.g. tonnes per day? 3,300 T/day
How long would it take to draw down the grain within the bunker when it is reaching expiry? [Estimated the bunker would hold 2 weeks' worth of grain for the mill](#)
2. Clarify whether it is intended to maintain the supply at 100% capacity in preparedness for a rail disruption, i.e. whether importation is to start immediately, or if it is intended to leave it empty and rapidly fill it when the risk of a disruption is high e.g. prior to forecast severe storms. The plan currently appears to foreshadow both scenarios. [We would like to fill the bunker up and leave there until rail emergency, then we would out-turn the bunker when this would accrue with rail.](#)
3. Clarify that grain will not be exported from the bunker in an ongoing manner over time when rail disruptions are not occurring, and the movements associated with export that needs to occur when the stored grain is close to expiry and needs to be used. [This statement is correct, only when rail is down and at the expiry of the wheat.](#)

Regards,

Simone Arnold | Project and Compliance Coordinator

36 Bolong Road, Bomaderry NSW 2541

M: [REDACTED]

E: simone.arnold@manildra.com.au

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Appendix B: Vehicle Movement Plans

