



Riverina Oils and Integrated Oilseed Plant

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

- ③ CEMP
- ③ Rev 4 - Updated
- ③ October 2024

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Glossary

Term	Definition
CEMP	Construction Environmental Management Plan
CEM	Construction Environmental Manager
CMS	Construction Method Statement
DP&I	NSW Department of Planning and Infrastructure
DTI	Department of Trade and Investment
EA	Environmental Assessment
ECP	Environmental Control Plan
ER	Environmental Representative
EMS	Environmental Management Strategy
EO	Environmental Officer
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPL	Environment Protection Licence

ESCP	Erosion and Sedimentation Control Plan
IOPP	Integrated Oilseed Processing Plant
MCoA	Minister's Conditions of Approval
NPW Act	<i>National Parks and Wildlife Act 1974</i>
OEH	NSW Office of Environment and Heritage (previously DECCW)
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
The project	The Integrated Oilseed Processing Plant
ROBE	Riverina Oils and BioEnergy Pty Ltd
SoC	Statement of Commitments

1 Introduction

1.1 CEMP purpose and scope

This Construction Environmental Management Plan (CEMP) has been prepared for the approved Integrated Oilseed Processing Plant (IOPP) to be located at 299 Trahairs Road, Wagga Wagga in New South Wales (NSW). The approved IOPP is referred to throughout this CEMP as “the project”. The project proponent is Riverina Oils & BioEnergy Pty Ltd (ROBE).

This CEMP is a component of the project Environmental Management Strategy (EMS) and should be read in conjunction with the EMS document. The EMS provides the overarching environmental management framework for the project and incorporates a range of issue specific environmental management sub-plans, including this CEMP (refer to **Figure 1-1**).

This CEMP has been prepared to meet the requirements of the Minister for Planning’s Conditions of Approval for the project, as detailed further in **Section 3.2.2**. It sets out the environmental management requirements for general environmental issues that are not covered by the other environmental management sub-plans of the EMS. Additional detailed environmental management specifications for soil and water management (including wastewater management), construction noise management, traffic management and waste management are provided within the other subplans of the EMS.

The primary purpose of this CEMP is to ensure that all statutory obligations and other requirements for the project are made known to construction staff (including contractors) and addressed through the implementation of effective environmental management measures. The environmental management measures documented in this CEMP apply to all stages of construction and are the responsibility of the project proponent, including ROBE’s construction staff and contractors.

During the construction of the bunkers, (increase oilseed capacity) ROBE will also have to enlarge the stormwater pond from 3ML to 8.8 ML, which consist of excavating the exiting stormwater pond to 8ML and having a clay compacted lining of the pond. Excavators will be used to excavate the stormwater pond; truck will be used to remove all soil from the site and a dozer will be used to place the clay liner and compact the clay liner. During the construction phase of the bunkers ROBE will have to level the bunker surface and compact the surfaces by using graders, tractors with scrappers attached to level the bunker surface, a compactor and have a water truck to suppress the dust during construction. After leveling and compacting the surface the prefabricated bunker walls will be placed in position.

1.2 CEMP objectives

The overall aim of this CEMP is to ensure that the environmental impacts of construction activities are minimised as far as practicable. The broad environmental management objectives of this CEMP are to:

- ③ limit the impact footprint of the construction works to that defined within the Environmental Assessment report, and Modification, for the approved project;
- ③ minimise generation of dust;
- ③ prevent pollution of waters and contamination of land;
- ③ prevent impacts on any previously undiscovered Aboriginal heritage objects or remains that may be located within the project site;
- ③ prevent impacts on any previously undiscovered non-Indigenous relics of historical heritage value that may be located within the project site; and
- ③ prevent unauthorised and unnecessary impacts on flora and fauna.

Specific objectives and targets for the issues covered by this CEMP are provided within the Environmental Control Plans in **Appendix A**.

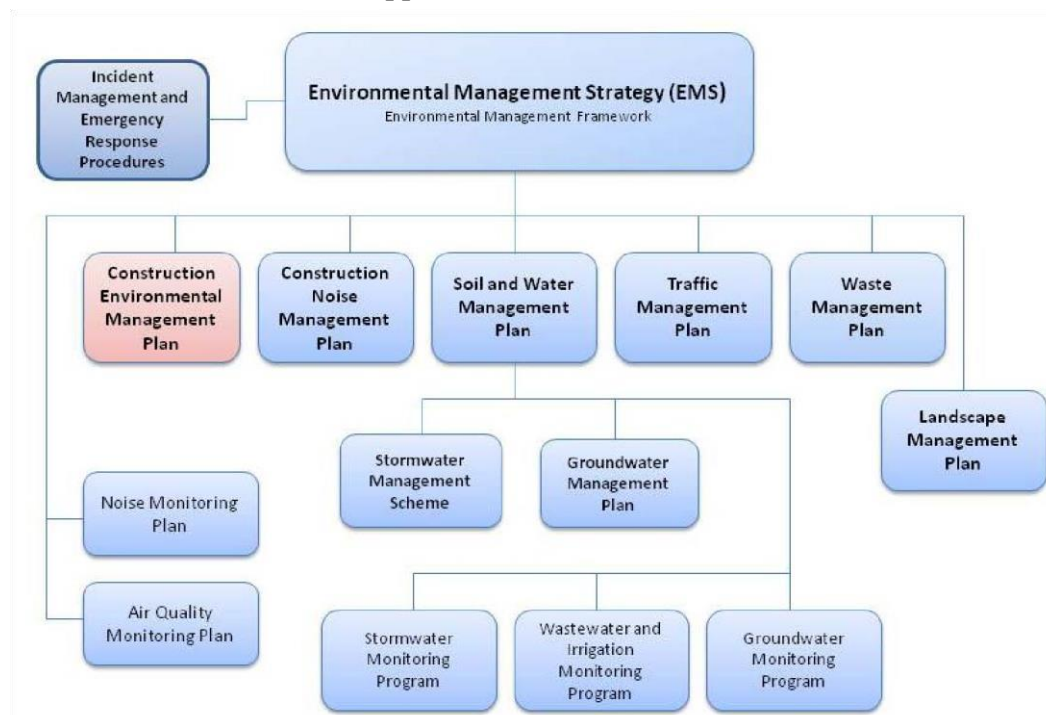


Figure 1-1 Relationship of this CEMP to the project EMS

2 Project description

2.1 Environmental assessment and approval

In 2008, ROBE proposed to construct and operate an Integrated Oilseed Processing and Biodiesel Plant north east of Wagga Wagga in the south western Riverina region of NSW. The proposed development was declared by the NSW Minister for Planning (the Minister) as a ‘major project’ under *State Environmental Planning Policy (Major Development) 2005* and was therefore subject to the environmental assessment and approval provisions of Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Approval to carry out the project was granted by the Minister under Part 3A Section 75J of the EP&A Act in November 2008 following the completion of the required Part 3A environmental assessment and public consultation process.

In June 2009, ROBE decided to defer the biofuel component of the project and subsequently lodged an application with the Department of Planning to modify the approved project. The proposed modification involved construction and operation of an Integrated Oilseed Processing Plant (IOPP), producing vegetable protein meal and edible vegetable oil for international, regional and domestic markets. The proposed modification was approved by the Minister on 28 April 2011.

Modification	Description	Decider	Determination Date
Mod-1	Removal of the biodiesel component, alternations to the site layout, increase in the vegetable oil output to 66,000 tpa and reduce the vegetable protein meal output to 90,000 tpa	Director-General	28 April 2011
Mod-2	Increase the seed crushing capacity to 200,000 tpa and increase the vegetable oil and vegetable protein meal outputs to 81,5000 tpa and 116,000 tpa	Acting Director	11 November 2015
Mod-3	Installation of an additional storage tank and a blending tank to produce blended oils	N/A	Withdrawn
Mod-4	Installation of an additional storage tank, a blending tank and ancillary works to produce blended oils	Director	30 August 2019
Mod-5	Addition of a bioenergy plant	N/A	Withdrawn

Mod-6	Remove the production limits on refined vegetable oil and protein vegetable meal	Team Leader	15 September 2023
Mod-7	Construct two grain bunkers and increase oilseed storage capacity	Acting Team Leader	4 September 2024

In September 2024 ROBE decided to construct two grain bunkers and increase oilseed storage capacity. Modification Application MP07_0146-Mod-7 and supporting documentation titled 'MOD 7 Increased Feedstock Storage Modification Report Riverina Oils and Bio Energy Pty Ltd'. The Applicant must not store more than 60,000 tonnes of oilseed, more than 3,000 tonnes of vegetable protein meal, and more than 3,232 kilolitres of vegetable oil on site at any one time.

2.2 The approved project

The approved IOPP project site is located on Lot 1 DP 1000675, on the corner of Trahairs Road and Byrnes Road, Wagga Wagga, and is known as 299 Trahairs Road. The approved project comprises the following components:

- ③ oilseed crushing plant;
- ③ solvent extraction plant; ③ vegetable oil refinery; and
- ③ storage and handling facilities.

The IOPP will use approximately 200,000 tonnes of oilseed (primarily canola and safflower seed) as raw material, from which vegetable protein meal and edible vegetable oil will be produced. (The completed IOPP will have a yearly manufacturing capacity of approximately 90,000 tonnes of vegetable protein meal and 66,000 tonne of refined edible vegetable oil, which will be sold to regional and domestic markets)MOD 6 removed limits.

The IOPP site is illustrated in **Figure 2-1**. The site is separated into a southern carparking/administrative section, a northern processing section, and a wastewater plant and evaporation pond positioned in the eastern section.

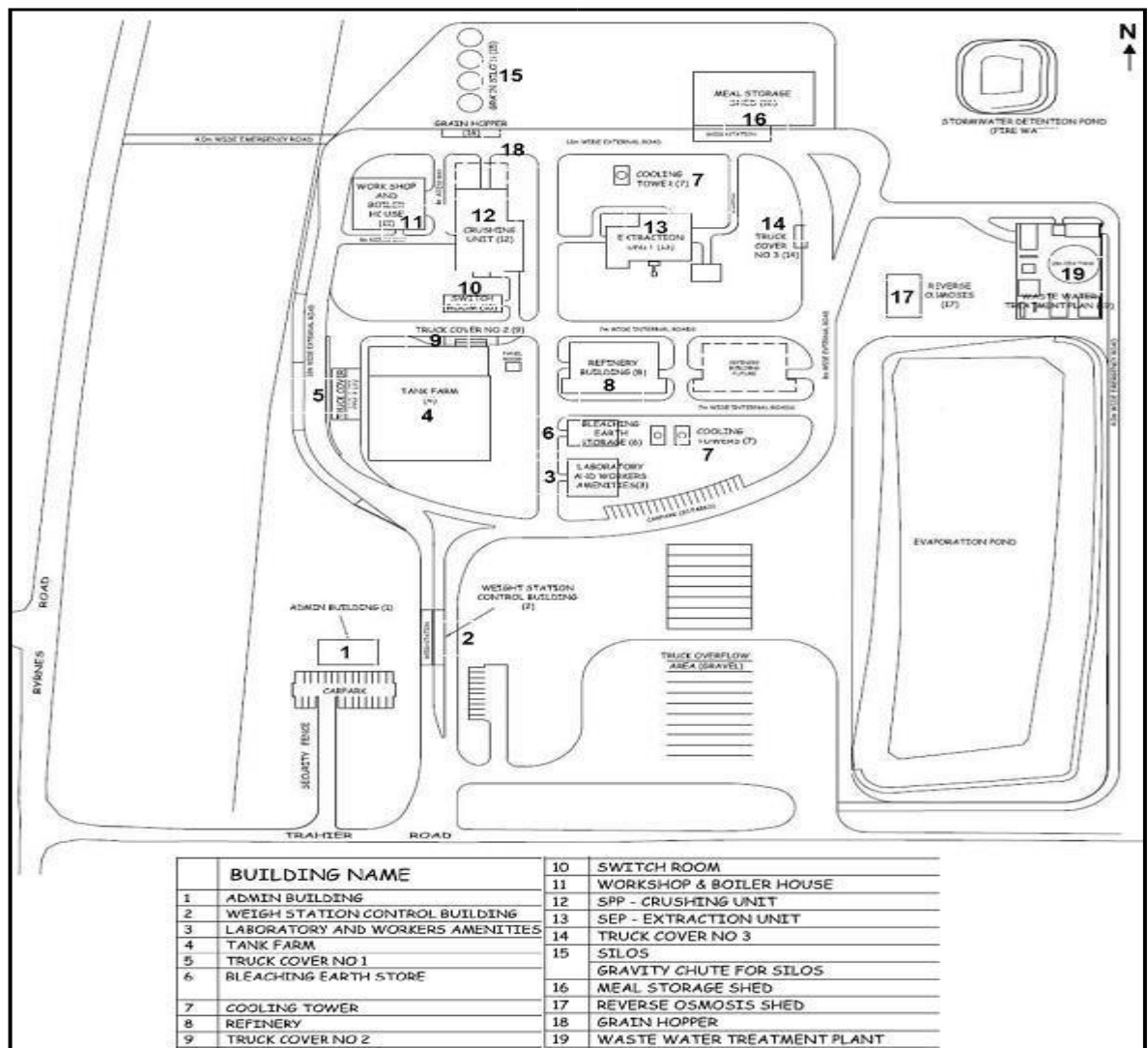


Figure 2-1 Layout of the IOPP site

2.3 Construction works

2.3.1 Construction activities

The construction of the project will comprise the following activities:

- ③ site establishment and preparation (completed with Stage 1 Construction);
- ③ clearing of vegetation (completed with Stage 1 Construction);
- ③ earthworks (completed with Stage 1 Construction);
- ③ delivery of raw construction materials and construction plant equipment to the site;
- ③ civil and grading works;
- ③ construction of amenities and access roads; ③ construction of the IOPP and storage facilities; and
- ③ landscaping.
- ③ Construction of two bunkers and enlarging of storm water pond to 8.8ML

In addition, a substantial upgrade of Trahairs and Byrnes Roads will be undertaken external to the site (see **Section 2.3.3** below).

Activities such as wash down and refuelling of construction plant and vehicles will be carried out on the site. Small quantities of fuels and chemicals, including diesel, lubrication oil and paint, will be stored on site. Only a small quantity of fuel will be kept on site to refuel the earth moving equipment (500l diesel fuel pod on the back of a ute, the ute does not stay on site overnight or when no construction work is done).

2.3.2 Temporary Construction Facilities

Temporary construction facilities will be erected on site during construction phase. Workers amenities and construction site offices were illustrated and approved with Stage 1 construction. ROBE are to provide an “all weather shelter” by Allshelter Pty, of 12m x 12m dimensions placed atop of two shipping containers. This is a lightweight construction covered in plastic to provide weather protection during inclement weather events. This structure is to be erected south of the existing Tank farm, in the FUTURE tank farm area.

Coates Hire providing the temporary amenities, and Allshelter Pty Ltd supplying the weather protection, have provided all necessary engineering and calculations to ensure the safety and integrity of the installation.

ROBE commit to remove all temporary construction facilities at the completion of construction, and rehabilitate the affected areas.

No temporary construction facilities or amenities will be provided, existing site facilities will be used during the construction of the bunkers and storm water pond.

2.3.3 Intersection upgrade

The proposed development will require a road and intersection upgrade at Trahairs Road and Byrnes Road as follows:

- ③ Trahairs Road will be widened and sealed to accommodate the types and volumes of vehicles expected during operation of the IOPP; and
- ③ the existing at-grade intersection at Byrnes Road and Trahairs Roads will be upgraded to a channelised intersection.

The new channelised intersection will be designed such that conflicting travel paths are separated by painted medians. Auxiliary lanes will be included as part of the intersection design to accommodate acceleration and deceleration of heavy vehicles. The intersection design will incorporate a channelised right turn to provide a protected right turn into Trahairs Road.

The road and intersection upgrades will be undertaken in consultation with the relevant roads authority (Wagga Wagga City Council) in accordance with *Austroads Rural Road Design: A Guide to the Geometric Design of Rural Roads* (Austroads, 2003) and *Austroads Guide to Traffic Engineering Practice – Part5: Intersections at Grade* (Austroads, 2005). Further information on the

intersection upgrade, including information on intersection design, construction activities and traffic management, is provided in the Traffic Management Plan.

2.3.4 Timing

Construction works for the project will be undertaken between the hours of 7.00 am and 6.00 pm Monday to Friday and 8.00 am to 1.00 pm Saturday. No construction work will be carried out on Sundays or public holidays.

Project construction is anticipated to take around 60 weeks, including site establishment, delivery of raw construction materials, delivery of plant and equipment, earthworks and grading, installation of amenities and services, and construction of the IOPP and ancillary structures.

Site preparation and earthworks activities have already been completed. It is anticipated that the remaining construction activities will commence around September 2011.

No changes to construction work time during the construction of the bunkers and stormwater pond.

2.3.5 Construction equipment

A variety of heavy mobile and stationary equipment will be employed to undertake each activity, with access and deliveries provided via Byrnes and Trahairs Road. Construction plant and equipment will be delivered to site at the start of construction works and remain on site for the duration of the construction period. The types of construction equipment and machinery that are likely to be used on site are listed in **Table 2-1**.

Table 2-1 Construction activities and equipment

Construction task	Major equipment
Earthworks	Dozer , excavator (2), haul truck (2), roller, tractors (2), grader (1), water truck (1).
Foundations	Agitator trucks (2), concrete pump, concrete saw
Structure erection	Mobile crane (2), compressor, delivery truck, hand tools
Pipe work	Mobile crane, delivery truck, hand tools
Electrical and mechanical installation	Mobile crane, delivery truck, hand tools
Intersection upgrade	Excavator, haul truck, asphalt paver, roller

2.3.6 Construction site layout

The site plan for the construction works is presented in **Figure 2-2**.

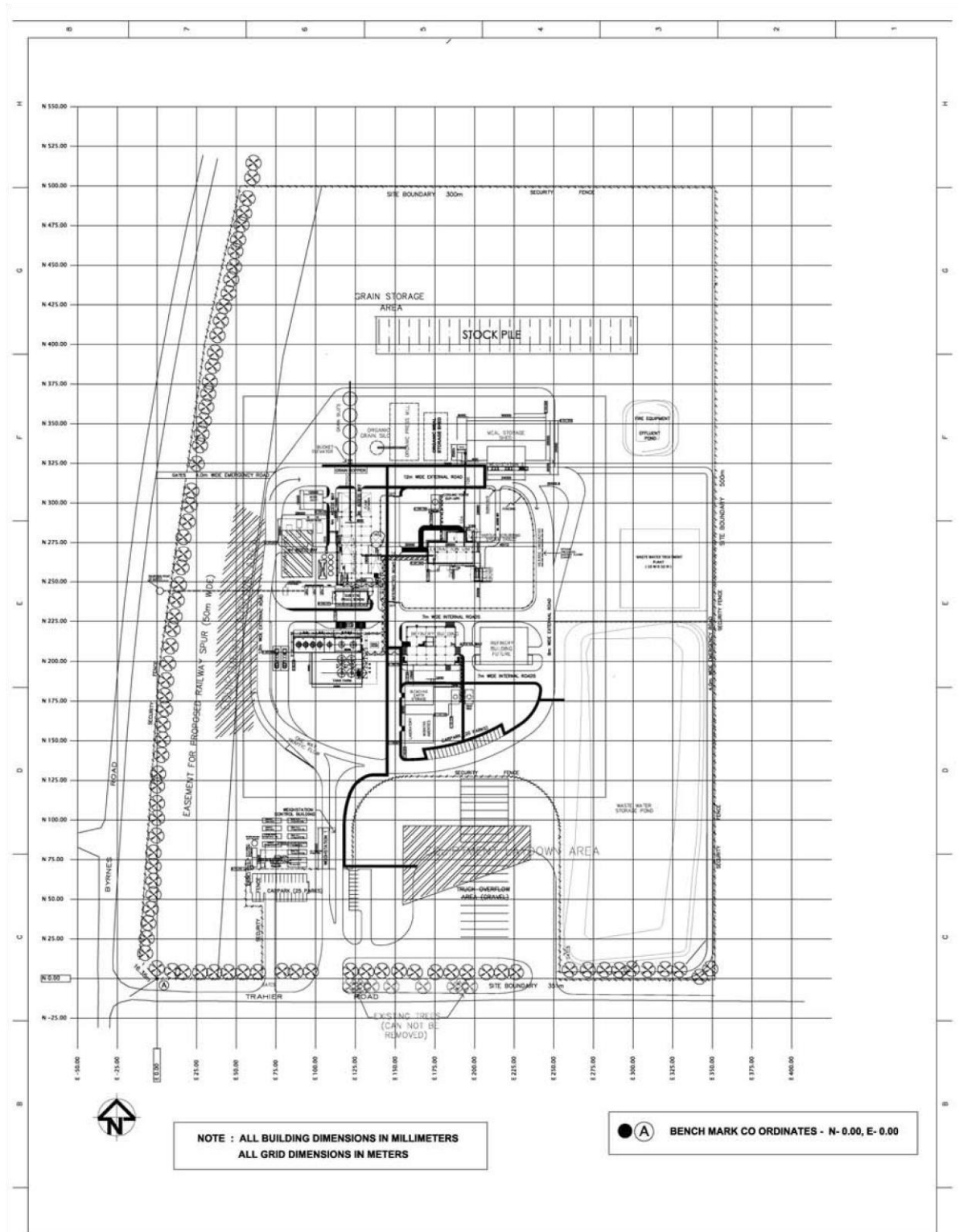


Figure 2-2 Construction site plan

3 Statutory and other requirements

3.1 Context

The requirements for environmental management during the site establishment and construction phases of the project are established by a number of sources, including:

- ③ environmental legislation and the associated approvals, licences and permits issued for the project; and
- ③ the requirements, including through consultation as necessary, of the NSW Department of Planning & Infrastructure (DP&I), NSW Office of Environment and Heritage (OEH), NSW Department of Trade and Investment (DTI) and Wagga Wagga City Council (WWCC).

This CEMP sets out the environmental management requirements for general environmental issues that are not covered by the other environmental management sub-plans of the EMS. The statutory and other requirements of relevance to these issues are identified in the following sections.

3.2 Environmental legislation

3.2.1 Overview of environmental legislative requirements

There are three approvals required prior to construction of the project:

- ③ approval from the Minister under the EP&A Act (this approval has already been obtained, as detailed in **Section 2.1**);
- ③ an Environment Protection Licence (EPL) under the *Protection of the Environment Operations Act 1997* (POEO Act) from OEH; and
- ③ approval from WWCC under Section 138 of the *Roads Act 1993* (Roads Act) for works within Byrnes Road, Wagga Wagga.

In addition to these approval requirements, there are a number of other environmental statutes that establish requirements or considerations for the project, including the:

- ③ *National Parks and Wildlife Act 1974* (NPW Act);
- ③ *Heritage Act 1977* (Heritage Act);
- ③ *Contaminated Land Management Act 1997* (CLM Act);
- ③ *Waste Avoidance and Resource Recovery Act 2001* (WARR Act);
- ③ *Noxious Weeds Act 1993* (NW Act); and ③ *Pesticides Act 1999*.

A summary of the environmental legislative requirements of relevance to this CEMP is presented in **Table 3-1**. Further details of the approval requirements are provided in **Section 3.2.2** and **Section 3.3.3**. Measures to address legislative requirements are provided in the Environmental Control Plans in **Appendix A** of this CEMP.

Table 3-1 Summary of environmental legislative requirements for construction

Statute	Administrative agency	Requirements applying to construction of the IOPP project	Where addressed
<i>Environmental Planning and Assessment Act 1979</i> (EP&A Act)	NSW Department of Planning & Infrastructure (DP&I)	The project has been granted approval by the Minister under the EP&A Act and must be carried out in accordance with the conditions of this approval. Any changes to the scope of works that are not consistent with the existing approved project must be subject to further assessment and approval before implementation.	The applicable Minister's Conditions of Approval are identified in Section 3.2.2 .
<i>Protection of the Environment Operations Act 1997</i> (POEO Act)	NSW Office of Environment and Heritage (OEH)	Construction of the project constitutes Scheduled Development Work under Section 47 of the POEO Act and requires an EPL. An EPL has been issued for the construction phase. The works must be carried out in accordance with this EPL. Any off-site discharges of wastewater or polluted runoff from the construction site that are not in accordance with an EPL would constitute a breach of Section 120 of the POEO Act. All reasonable measures must be employed to prevent pollution and ensure appropriate disposal of any wastes generated. The OEH must be notified of any pollution incidents that cause or threaten material harm to the environment in accordance with Section 148 of the POEO Act.	The requirements of the EPL are identified in Section 3.2.3 . General measures for EPL compliance and prevention of pollution are provided in Appendix A . Additional measures are provided in the other sub-plans of the EMS, including the Soil and Water Management Plan and Waste Management Plan.
<i>Roads Act 1993</i> (Roads Act)	Roads and Traffic Authority of NSW (RTA)	The proposed intersection upgrade on Byrnes Road constitutes works within a public road and requires approval from the relevant roads authority, being Wagga Wagga City Council (WWCC). The appropriate approval from WWCC must be obtained before carrying out the proposed intersection upgrade.	The requirements for approval under Section 138 of the Roads Act are identified in Section 3.2.3 .
<i>National Parks and Wildlife Act 1974</i> (NPW Act)	NSW Office of Environment and Heritage (OEH)	Among other matters, the NPW Act provides for protection of Aboriginal heritage. Although there are no approval requirements for the project with respect to Aboriginal heritage, there is a requirement to protect Aboriginal heritage in accordance with the objects of the Act. While the project site does not contain any known Aboriginal heritage items and the project is unlikely to impact Aboriginal heritage, there is a possibility that previously undiscovered Aboriginal heritage items may be found during construction. If any Aboriginal objects or archaeological remains are discovered during construction, all activities that have the potential to impact the find must cease and the OEH must be notified to determine the appropriate course of action.	Measures to address the requirements of this Act are provided in the Environmental Control Plans in Appendix A .

<i>Heritage Act 1977</i> (Heritage Act)	Heritage Branch, DP&I	The Heritage Act provides for protection of heritage items of State and local significance, as well as protection of relics of non-Indigenous origin ¹ . Although there are no approval requirements for the project under the Heritage Act, there is a requirement to protect historic heritage in accordance with the objects of the Act. While the project site does not contain any known heritage items and heritage impacts are unlikely, there is a possibility that previously undiscovered relics may be found during construction. If any relics are discovered during construction, all activities that have the potential to impact the relic must cease and the Heritage Branch must be notified to determine the appropriate course of action.	Measures to address the requirements of this Act are provided in the Environmental Control Plans in Appendix A .
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Statute	Administrative agency	Requirements applying to construction of the IOPP project	Where addressed
<i>Contaminated Land Management Act 1997</i> (CLM Act)	NSW Office of Environment and Heritage (OEH)	There are no approval requirements for the project under the CLM Act. Nevertheless, the proponent must notify the OEH in accordance with Section 60 of the CLM Act if they become aware that construction activities have contaminated land in such a way as to present a significant risk of harm or if they become aware that the work site has been contaminated in such a way as to present a significant risk of harm.	Measures to address the requirements of this Act are provided in Appendix A . Additional measures are provided in the other sub-plans of the EMS, including the Soil and Water Management Plan and Waste Management Plan.

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<i>Biosecurity Act 2015</i>	Department of Trade and Investment (DTI)	The NW Act provides for the classification and management noxious weeds and places obligations on owners and occupiers of land to control and prevent the spread of noxious weeds. The Class 4 noxious weed <i>Echium plantagineum</i> (Patterson's Curse) occurs throughout the site. For Class 4 weeds, the growth and spread of the plant must be controlled according to the measures specified in a management plan published by the local control authority. WWCC is the local control authority and has developed the <i>Class 4 Noxious Weed Control Management Plan 2006 – 2011</i>. This document outlines the control measures to be undertaken by property owners for Patterson's Curse. An unexpected finds protocol will be prepared to detail measures to be undertaken if threatened flora and fauna not previously recorded on site are detected during construction activities. Declared priority weeds will be managed in accordance with the requirements of the <i>NSW Biosecurity Act 2015</i>. Soil material and stripped groundcover vegetation with the potential to contain priority weeds will not be removed from the Camp 1 and Camp 3 sites. Soil disturbance will be avoided as much as possible to minimise the potential for spreading weeds.	Measures to address the requirements of this Act and the <i>Class 4 Noxious Weed Control Management Plan 2006 – 2011</i> are provided in the Environmental Control Plans in Appendix A. Current weed management obligations are made in respect of the former legislation. The <i>Biosecurity Act 2015</i> introduced significant reforms to weed management and classification of and obligations to manage specific species. ROBE is required to meet the general biosecurity obligations of the Act. Appendix C
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<i>Pesticides Act 1999</i> (Pesticides Act)	Department of Trade and Investment (DTI)	This Act provides for the regulation of pesticide use, with key objectives including protection of human health and the environment. Any use of pesticides on the site to control weeds or other pests must be in accordance with the Pesticides Act. It is an offence under the Act to possess or use an unregistered pesticide without a permit, or contrary to the approved label, fail to comply with the label or permit while using a pesticide, keep a registered pesticide in a container without a label, and possess or use a restricted pesticide without authorisation.	Measures to address the requirements of this Act are provided in the Environmental Control Plans in Appendix A.
<i>Dangerous Goods (Road and Rail Transport) Act 2008</i> <i>Environmentally Hazardous Chemicals Act 1985</i>	WorkCover – (storage/ handling) OEH (transport)	Storage and transport of hazardous chemicals and dangerous goods (such as diesel) must be in accordance with: <i>Storage and handling of dangerous goods: Code of practice</i> (WorkCover NSW, 2005); <i>Australian Dangerous Goods Code, 7th Edition</i> (National Transport Commission, 2007); and AS 1940: 1993 <i>The Storage and Handling of Flammable and Combustible Liquids</i>. A licence is required for storage and/or transport of prescribed quantities of dangerous goods.	Measures to address the requirements of these Acts are provided in the Environmental Control Plans in Appendix A.

1. Under the Heritage Act, a 'relic' means any deposit, object or material evidence that: i) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement; and ii) is of State or local heritage significance.

3.2.2 Minister's Conditions of Approval

The Minister's Conditions of Approval (MCoA) for the project comprise the Project Approval issued on 4 November 2008 for Project Application 07_0146 and the Notice of Modification issued on 28 April 2011 for Modification Application 07_0146 MOD 1. The Notice of Modification amends the Project Approval and also incorporates the amended Statement of Commitments (SoC) for the project.

Project approval, section 75J of the Environmental planning assessment Act 1979, modification application 07-0146 and notice of modification issued on 04/09/2024.

Schedule 4, section:

60a. ROBE will review and update their CEMP to outline their environmental management practice and procedures during the construction of the bunkers and storm water pond.

- a description of all activities to be undertaken on the site during construction of the facility, including an indication of stages of construction, where relevant.
- b) statutory and other obligations that the Applicant is required to fulfil during construction, including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies.
- c) specific consideration of measures to address any requirements of the Department, Council and the EPA during construction.
- d) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.
- e) a description of the roles and responsibilities for all relevant employees involved in the construction of the Development.

60d. ROBE will review and update their CEMP before construction commence under condition 60a.

Requirement to prepare a CEMP

Condition 24 in Schedule 3 of the Notice of Modification amends Schedule 3 of the Project Approval to include a new condition, Condition 60a, for preparation of a CEMP. The requirements of Condition 60a are as follows:

The Proponent shall prepare and implement a Construction Environmental Management Plan (CEMP) to outline environmental management practices and procedures to be followed during the construction of the project. The Plan shall include, but not necessarily be limited to:

- (a) description of all activities to be undertaken on the site during construction of the facility, including an indication of stages of construction where relevant;*
- (b) statutory and other obligations that the Proponent is required to fulfil during construction, including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;*
- (c) specific consideration of measures to address any requirements of the Department, Council and the OEH during construction;*
- (d) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; and*
- (e) a description of the roles and responsibilities for all relevant employees involved in the construction of the project.*

The CEMP shall be submitted for approval of the Director-General prior to the commencement of construction of the project.

This document fulfils the requirements for preparation of a CEMP and specifically addresses the requirements of Condition 60a as follows:

- ③ Chapter 2 – Contains a description of the project, including construction activities.
- ③ Chapter 3 – Identifies the statutory and other obligations for the project (including the requirements of DP&I, OEH and WWCC) and how these obligations and requirements have been addressed.
- ③ Chapter 4 – Identifies the environmental controls that will be implemented for the project, the procedures that will be employed to achieve compliance, and the roles and responsibilities of all relevant employees.

- ③ Chapter 5 – Identifies the training that will be delivered to construction staff so that all construction staff are made aware of the environmental issues and requirements.
- ③ Chapter 6 – Describes how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.

It is noted that the amended Statement of Commitments (as included in Appendix B of the Notice of Modification) requires the proponent to prepare a CEMP incorporating an Erosion and Sediment Control Plan. The required Erosion and Sediment Control Plan is contained within the Soil and Water Management Plan (refer to **Figure 1-1**). **MCoA obligations addressed in this CEMP**

In addition to establishing the requirement for preparation of a CEMP, the MCoA establish obligations for managing specific environmental aspects and impacts during construction and operation of the project. The MCoA obligations that are addressed in this CEMP are identified in **Table 3-2**. The MCoA obligations for management of noise, traffic, soil and water (including erosion and sediment control), wastewater and other wastes generated during construction are addressed in the other environmental management sub-plans of the EMS (refer to **Figure 1-1**). **Table 3-2 MCoA obligations addressed in this CEMP**

Obligation	Source	Where addressed
Obligation to minimise harm to the environment		
The Proponent shall implement all practicable measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the project.	Project Condition 1	Approval This CEMP Other sub-plans of the EMS
Operation of plant and equipment		
The Proponent shall ensure that all plant and equipment used on site is maintained and operated in an efficient manner, and in accordance with relevant Australian Standards.	Project Condition 14	Approval ECP 2 (Appendix A)

Discharge limits			
Except as may be expressly provided in an EPL for the project, the Proponent shall comply with Section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	Project Condition 15	Approval	ECP 1 (Appendix A)
Bunding			
The Proponent shall store all chemicals, fuels and oils used on site in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored with the bund. These bunds shall be designed and installed in accordance with the requirements of all relevant Australian Standards, and/or DEC's Environmental Protection Manual <i>Technical Bulletin Bunding and Spill Management</i> .	Project Condition 18	Approval	ECP 2 (Appendix A)

Obligation	Source		Where addressed
Areas containing storage tanks shall be fully bunded to contain accidental spills	Amended SoC (refer to Notice of Modification)		ECP 2 (Appendix A)
Air			
During construction, the Proponent shall ensure that: a) all trucks entering or leaving the site with loads have their loads covered; b) trucks associated with the project do not track dirt onto the public road network; and c) the public roads used by these trucks are kept clean.	Project Condition 34	Approval	ECP 2 (Appendix A)
The Proponent shall carry out all reasonable and feasible measures to minimise the dust generated by the construction and operation of the project.	Project Condition 35	Approval	ECP 2 (Appendix A)
The proponent shall take all practicable measures to ensure that air emissions during the construction and operation of the project are within relevant air quality and odour criteria and guidelines.	Amended SoC (refer to Notice of Modification)		ECP 2 (Appendix A)
Visual			

The Proponent shall ensure that the lighting associated with the project: a) complies with the latest version of Australian Standard AS 4282 (1NT) – <i>Control of Obtrusive Effects of Outdoor Lighting</i> ; and b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Project Condition 52	Approval	ECP 2 (Appendix A)
Exterior lighting would be designed to minimise light spill, and would be generally in accordance with Australian Standard 4282-1997 <i>Control of the Obtrusive Effects of Outdoor Lighting</i> , notwithstanding functional and safety requirements.	Amended SoC (refer to Notice of Modification)		ECP 2 (Appendix A)
Corrosive chemicals			
The proponent shall ensure that corrosive materials spill kits are installed throughout areas of the IOPP where corrosive materials are stored, handled and used at the site.	Amended SoC (refer to Notice of Modification)		ECP 2 (Appendix A)
Heritage			
The proponent shall ensure that in the event that Aboriginal objects are identified during works on site, works in the vicinity of the find would cease and the IOPP Environmental Representative would notify a heritage professional to obtain advice on how to proceed. Works would not recommence until heritage requirements identified through this process have been met.	Amended SoC (refer to Notice of Modification)		ECP 2 (Appendix A)
Should suspected skeletal material be uncovered during the course of any site works or through subsidence landscape modification, all works must cease and the OEH, the NSW Police and the NSW Coroner's office contacted immediately, regardless of any existing environmental approvals.	Amended SoC (refer to Notice of Modification)		ECP 2 (Appendix A)
Contractors shall be made aware of the above recommendations, and advised of their responsibilities in relation to the protection of Aboriginal objects and sites under state legislation.	Amended SoC (refer to Notice of Modification)		ECP 2 (Appendix A)
Flora and fauna			
Obligation	Source	Where addressed	

The proponent shall ensure that all practicable measures are implemented to minimise the potential impacts on flora and fauna, including: ④ Felled trees shall remain in situ for at least 24 hours to allow fauna species to relocate. ④ Qualified personnel shall be on hand to check trees hollows for wildlife and assist with relocation, if required. ④ Should wildlife be inadvertently injured, an accredited veterinarian (and through them possibly a wildlife care group) shall be contacted.	Amended SoC (refer to Notice of Modification)	ECP 2 (Appendix A)
The proponent shall undertake weed monitoring during construction and operation to control weed infestations and apply appropriate control measures, if required. Measures to control Patterson's Curse shall be implemented in accordance with the Class 4 Noxious Weed Control Management Plan 2006 – 2011.	Amended SoC (refer to Notice of Modification)	ECP 2 (Appendix A)

3.2.3 Other approvals, licences and permits Environment Protection Licence issued under the POEO Act

An Environment Protection Licence (EPL No. 13097) has been granted to ROBE under Section 55 of the POEO Act. The licence authorises the carrying out of the following scheduled development work at the project site:

- ③ Stage 1 - Preliminary works, which are limited to site establishment, clearing, earthworks and the installation of services;
and
- ③ Stage 2 - Construction and operation of an oil seed crushing plant and associated infrastructure.

The licence also authorises the carrying out of the following scheduled activities at the site:

- ③ agricultural processing (> 100000 - 250000 T processed); and
- ③ chemical storage.

The licensee must not carry on any scheduled activities until the scheduled development works are completed, except as provided in the licence. The authorised scheduled development works must be carried out in accordance with the licence.

Approval under Section 138 of the Roads Act

The proposed intersection upgrade on Byrnes Road constitutes works within a public road and therefore requires approval under Section 138 of the Roads Act from the relevant roads authority. The relevant roads authority is WWCC. The appropriate approval from WWCC must be obtained before carrying out the proposed intersection upgrade and the upgrade must be carried out in accordance with the conditions of that approval.

3.3 Agency and stakeholder requirements

The MCoA require ROBE to consult with specific authorities in the preparation of this CEMP and other issue specific management plans for the construction phase. **Table 3-3** lists the issue specific management plans that must be prepared prior to construction of the project and their corresponding agency approval (A) and consultation (C) requirements.

Table 3-3 Agency consultation and approval requirements for EMS sub-plans

Plan	Source/ MCoA reference	DP&I	DTI	OEH	WWCC
Construction Environmental Management Plan	Project Approval Condition 60a (Notice of Modification Condition 24)	A		C	C
Soil and Water Management Plan*	Project Approval Condition 19 (amended by the Notice of Modification Condition 10)	A	C	C	C
Construction Noise Management Plan	Project Approval Condition 25	A		C	
Traffic Management Plan	Project Approval Condition 45 (amended by the Notice of Modification Condition 20)	A			C
Landscape Plan	Project Approval Condition 53 (amended by the Notice of Modification Condition 23)	A			C
Waste Management Plan	Project Approval Condition 56	A		C	C

* Incorporating a Stormwater Management Scheme and monitoring program, Wastewater and Irrigation Management Plan and monitoring program, and Groundwater Management Plan and monitoring program.

There are additional requirements for agency consultation in connection with legislative approvals and obligations. Specifically, there is a requirement to consult with:

- ③ OEH in relation to EPL requirements;
- ③ WWCC in relation to approval to undertake works within Byrnes Road;
- ③ RTA and WWCC in relation to design standards and requirements for the works within Byrnes Road; and ③ DTI and WWCC regarding the management of noxious weeds.

This CEMP, as a component of the EMS and supported by the other issue specific management plans, is designed to address stakeholder expectations and requirements.

4 Environmental controls and implementation

4.1 Environmental control plans

The environmental management controls and safeguards to be implemented as part of this CEMP are presented in the Environmental Control Plans (ECPs) in **Appendix A**. This CEMP contains two ECPs:

- ③ ECP1 – Covers general administrative requirements relating to documentation, approvals, staff training and general site security; and ③ ECP2 – Covers environmental controls and safeguards for general environmental issues.

4.2 Construction Method Statements

Implementation of the ECPs will be supported by Construction Method Statements (CMSs), which will be prepared by ROBE and its construction contractor(s). CMSs will be developed to guide specific construction activities, including but not limited to clearing, materials delivery, and earthworks. The CMSs will document the procedures to be followed and actions to be taken to ensure compliance with this CEMP during the carrying out of specific construction activities.

Bunkers construction operational process.

Step	All CEMP uses	Controls in place during construction of bunkers and storm water pond.
Step 1. Identify activities	Ground leveling activities. 1. The use of a tractors with a ground leveling attachment scrapping the ground level for the walls to be placed on a level ground surface. 2. The use of a water truck to do dust suppression. 3. The use of a grader to ensure the ground is level. Construction of bunker walls. 1. The use of a telehandler to lift the bunker concrete walls and place the wall in position in the bunker floor. 2. Ensuring all walls are placed level and inline before nailing the walls to the ground. Construction of stormwater pond. 1. The use of an excavator to loosen and excavate the sides of the existing storm water pond.	Reduce noise as low as reasonably practical. Dust suppression by using water truck. Dangerous goods and hazardous substance controls. Weekly site checks or inspections.

	2. The use of the excavator to remove the soil that was generated in constructing the dam to load it onto truck to be removed from site. 3. The use of trucks to remove all soil from any excavation.	
Step 2. Apply CEMP controls	The relevant CEMP control measures must be implemented during bunkers construction activities.	Reduce noise as low as reasonably practical. Dust suppression. Dangerous goods and hazardous substance controls. Weekly site checks or inspections.
Step 3. Monitor implementation of CEMP	Workers, supervisor and environmental manager to monitor CEMP compliance to controls. Non-conformances are to be reported as environmental incidents. Company EHS manager to conduct periodic inspections to assess CEMP compliance.	A non-conformance, community compliance and week inspection to be created and implemented.

Earthworks operations and activities:

Operation Category	Possible included activities
Earthworks	- Excavation and trenching. - Geotechnical and exploratory ground investigation. - Ground improvement and / or compaction. - Management of soil stockpiles.
Construction of bunkers	Construction of new bunker structures.
Storage, handling and use of dangerous goods, grease, oils and fuel	- Maintenance and repair of vehicles and plant. - Storage and use of grease, oils and fuel. - Storage and handling of dangerous goods. - Generation and management of any wastes.
Vegetation management	Vegetation where required clearing.

Risk assessment summary:

Activity	Potential Environmental Impacts	Risk Rating
Excavation and trenching	- Erosion of disturbed soils. - Generation of dust. - Sedimentation of surface water caused by sediment in stormwater runoff. - Erosion and migration of contaminated materials.	Medium
Storage and use of dangerous goods, grease, oils and fuel	- Pollution of land and groundwater from spills. - Pollution of stormwater/ surface water from spills.	Medium
Maintenance and repair of vehicles and plant	- Pollution of land and groundwater from fuel or other spills. - Pollution of stormwater/ surface water from fuel or other spills.	Medium
Storage and handling of quantities of other dangerous goods	Spill or other major LOC of DGs causing contamination of soil.	Medium
Vegetation clearing	Potential unintended impacts to native flora and fauna or protected ecosystems or species.	Medium

4.3 Construction staff roles and responsibilities

The roles and responsibilities for construction environmental management for the IOPP project are listed in **Table 4-1**. A description of environmental management responsibilities will be included in the position descriptions of all construction staff and contractors employed by ROBE. The individuals appointed to each position will be required to review and sign-off on their responsibilities before starting work.

Table 4-1 Roles and responsibilities for construction environmental management

Role	Responsibilities
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EHS Manager	③ Ultimate responsibility for on-site environmental performance and compliance during the site preparation and construction phases of the project. ③ Ensuring that the Environmental Representative/ Construction Environmental Manager fulfils their responsibilities.
Site Supervisor/ Site Foreman / primary contractor	③ Ensuring that appropriate CMSs to support this CEMP and other sub-plans of the EMS are prepared for specific construction activities. ③ Ensuring that all construction site staff have read and signed off on their environmental management responsibilities and have receive the required environmental training prior to starting work on the project construction site. ③ Ensuring compliance with legislative and agency requirements for environmental management through effective implementation of the EMS and all environmental management sub-plans of the EMS, including this CEMP.

Role	Responsibilities
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Environmental Representative/ Construction Environmental Manager	③ Ensuring that the EMS and all environmental management sub-plans and monitoring programs required under the MCoA are developed and approved within the required timeframes in consultation with the relevant agencies. ③ Managing approvals, licences and permits, and all associated review, monitoring and reporting requirements. This includes: obtaining all relevant approvals, licences and permits within the required timeframes; renewing licences and permits as required; tracking of compliance; and addressing non-compliance issues. ③ Ensuring day-to-day implementation of the project EMS, this CEMP and other environmental management sub-plans of the EMS. ③ Delivering environmental training to all construction staff. ③ Ensuring that regular site inspections and audits are carried out in accordance with the EMS to assess compliance, the effectiveness of environmental management measures and the need for corrective actions or improvements. ③ Ensuring that any deficiencies in compliance or the effectiveness of environmental management measures are addressed in a timely manner. ③ Ensuring that this CEMP and all other environmental management sub-plans are reviewed and updated in accordance with the EMS. ③ Providing environmental advice to Site Supervisor/ Site Foreman, including advice on matters specified in the MCoA and other approval and licence requirements. ③ Providing supervision and guidance on environmental management and compliance matters to other construction staff, including any other environmental staff. ③ Providing environmental input to the preparation and review of CMSs to ensure that environmental matters are adequately considered. ③ Receiving and responding to complaints, as required, in accordance with relevant community communication strategies. ③ Responding to environmental incidents in consultation with the Site Supervisor/ Site Foreman in accordance with the relevant incident management and emergency response procedures prepared for the project.
All construction site staff	③ Being aware of and understanding their environmental management responsibilities. ③ Attending all required environmental training before commencing work on the project site and adhering to and remaining familiar with the principles covered in the training. ③ Being aware of the appropriate contact person(s) for information on environmental matters and notification of environmental incidents. ③ Carrying out all on-site activities in accordance with the EMS (including this CEMP and all other management sub-plans of the EMS) and all CMSs. ③ Notifying the Site Supervisor/ Site Foreman and the Environmental Representative/ Construction Environmental Manager of any deficiencies in environmental compliance or environmental management and any activity that threatens or causes environmental harm.

4.4 Management of contractors

Environmental management requirements will be included in the selection and management of contractors working on site and will be included in the contract documents for the works. ROBE is ultimately responsible for ensuring that all persons on the project, including contractors, subcontractors and their employees, comply with the relevant environmental requirements. Contractors and their employees are required to comply in full with the EMS (including this CEMP and other issue specific management sub-plans) and all CMSs. Contractor personnel are considered equivalent to ROBE personnel in all aspects of environmental management.

4.5 Compliance management

Compliance management for the site establishment and construction stages of the project will be managed through a system of monitoring, site inspections, auditing and reporting, as set out in the EMS. For this CEMP, the compliance management process will be supported by completion of Environmental Site Inspection Checklists (see **Appendix B**), Environmental Action Registers (see **Appendix C**) and Environmental Audit Reports. The monitoring, site inspection, environmental auditing and reporting requirements associated with this CEMP are detailed in Chapter 6.

All documents and records associated with compliance management will be kept on the construction site in both hard copy and electronic formats. These documents and records will include the EMS, this CEMP and other issue specific management sub-plans, correspondence relating to environmental management performance and compliance, and completed checklists and reports.

4.6 Communication and consultation

Consultation with a range of stakeholders will be required throughout the construction period. This will include but will not be limited to the relevant regulatory agencies, namely DP&I, OEH, DTI and WWC. ROBE will consult and co-operate with all relevant regulatory agencies in meeting the project environmental requirements and will permit those agencies to audit the activities for compliance. Specific agency requirements are identified in **Section 3.3**.

A list of relevant contact names, telephone numbers and fax numbers for project stakeholders will be maintained by ROBE on the construction site, using a form similar to the example provided in **Appendix D**. Matters that require stakeholder consultation or may trigger the need for consultation in relation to this CEMP are summarised in **Table 4-2**.

Table 4-2 Matters that require stakeholder consultation or trigger need for consultation

Agency	Matters requiring consultation or triggering need for consultation	CEMP reference
DP&I	Need for approval of EMS and associated management plans	Table 3-3 ECP 1 Appendix A
	Need for further assessment and approval in event of changes in scope of works	Table 3-1 ECP 1 Appendix A
	Need for notification of and consultation with Heritage Branch if a non-Indigenous relic of historic heritage value is discovered during construction	Table 3-1 ECP 2 Appendix A
OEI	Need for consultation in preparation of management plans	Table 3-3
	Need for notification and consultation in the event that an Aboriginal object or potential Aboriginal object is discovered during construction	Table 3-1 ECP 2 Appendix A
	Need for notification in the event of a pollution incident or an incident that causes or threatens material harm to the environment.	Table 3-1 ECPs 1 -3 Appendix A
	Need for notification in the event of causing or discovering contamination	Table 3-1 ECP 2 Appendix A
DTI	Need for consultation in preparation of management plans	Table 3-3
WWCC	Need for consultation in preparation of management plans	Table 3-3
	Need for consultation in relation to approval under the Roads Act and design of intersection upgrade	Table 3-1 ECP 1 Appendix A
	Need for consultation on control of Patterson's Curse	Table 3-1 ECP 2 Appendix A

Local Aboriginal Land Council	Need for consultation (in conjunction with a suitably qualified Aboriginal heritage specialist and/or OEH) in the event that an Aboriginal object is discovered during construction	ECP2 Appendix A
Police	Need for notification in the event that human skeletal remains are discovered during construction	ECP2 Appendix A
Coroner	Need for notification in the event that human skeletal remains are discovered during construction	ECP2 Appendix A

4.7 Handling of complaints

Community complaints relating to construction of the project will be dealt with via the Complaint Protocol, which is detailed in the EMS.

4.8 Incident management, emergency response, and incident reporting.

Any environmental incidents caused by or associated with project construction will be dealt with using the Incident Management and Emergency Response Procedures developed for the project. Further details of these procedures are provided in the EMS. These procedures will be implemented to ensure that any incidents or emergencies caused by or associated with project construction are responded to and managed in a manner that minimises the potential for adverse environmental and human health effects. Incidents that cause or threaten material harm to the environment must be reported to OEH in accordance with Section 148 of the POEO Act (refer to **Table 3-1**).

Reporting incidents within 24 hours of detecting an exceedance of the limits/performance criteria in this approval or the occurrence of an incident that causes (or may cause) harm to the environment, the Applicant must notify the Department and other relevant agencies of the exceedance/incident.

Within 6 days of notifying the Department and other relevant agencies of an exceedance/incident, the Applicant must provide the Department and these agencies with a written report that:

- a) describe the date, time, and nature of the exceedance/incident.

- b) identify the cause (or likely cause) of the exceedance/incident.
- c) describe what action has been taken to date; and
- d) describe the proposed measures to address the exceedance/incident.

4.9 Review and improvement of this CEMP

This CEMP is designed as a ‘live’ document that must be periodically reviewed and updated. At a minimum, it will be reviewed at approximately six month intervals to assess the need for revision. These reviews will take into consideration:

- ③ The results of environmental site inspections and audits, which will be used as indicators of environmental management performance.
- ③ Any non-compliances or incidents that have occurred and the corresponding causes and corrective actions taken.
- ③ Any changes in legislation and corresponding statutory requirements for the project.

The purpose of these reviews will be:

- ③ To ensure that the CEMP provides an accurate and adequate specification of the legislative and environmental management requirements for the project.
- ③ To seek opportunities for continuous improvement of the CEMP and environmental performance.

This CEMP must also undergo additional updates, as required, to address any changes or actions that are not picked up by the three monthly reviews. These may include:

- ③ changes in work methods;
- ③ changes in legislation; and/or
- ③ changes in environmental controls or procedures in response to non-compliances, incidents, complaints or audit recommendations.

This CEMP is updated to incorporate the expansion of the 2 new bunkers construction and excavation of stormwater pond. Approved MOD 7 construction of two grain bunker and increasing oilseed storage capacity, 4 September 2024.

5 Environmental training

5.1 Overview

At a minimum, three forms of environmental training will be provided to construction staff (including contractors):

- ③ Environmental site induction training
- ③ Environmental management training;
- ③ Toolbox training.

Records of induction and training will be kept on file. These records will document the type of training carried out, dates, attendees and trainer details. Construction staff who have attended inductions and training sessions will be required to sign-off on their attendance in a manner that acknowledges that they have been informed of the environmental issues and that they understand their environmental management responsibilities.

Training will be delivered by the construction Environmental Representative/ Construction Environmental Manager. All construction staff and contractors must undergo environmental training before commencing work on the project construction site.

5.2 Environmental site induction training

Prior to working on site all personnel and contractors will undertake environmental site induction training. This training will provide an overview of general environmental management requirements and responsibilities. It will include provision of information on:

- ③ ROBE's Environmental Policy;
- ③ the legal requirements for the project, including: approvals, licences and permits; actions required for compliance with legislation; need for demonstration of due diligence; and potential consequences of infringements;
- ③ the potential environmental impacts that may result from project construction activities, including the types of environmental incidents that may occur;

- ③ how environmental issues will be managed on site with the application of the EMS, this CEMP, and other issue specific management subplans; and
- ③ the responsibilities of construction staff, including their responsibilities for implementing environmental controls and reporting potential environmental issues and infringements;
- ③ site-specific environmental issues and considerations, including:
 - the location of construction work boundaries;
 - the environmental control measures in place on site (such as bunding and erosion and sediment controls); and
 - the designated areas for specific construction activities such as stockpiling, chemical storage, waste disposal, and plant and equipment maintenance and wash down;
- ③ the potential to encounter previously undiscovered Aboriginal objects or remains and non-Indigenous relics, and the required procedures to follow in the event of such finds;
- ③ the potential to discover pre-existing contamination and the corresponding actions required;
- ③ recognition of environmental incidents that require immediate response;
- ③ the locations of incident response equipment such as spill kits; and ③ the notification procedures for environmental harm/incidents.

5.3 Environmental management training

Targeted environmental management training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact, such as excavation and earthworks. This environmental training will aim to achieve a level of awareness and competence appropriate to their assigned activities. The target groups and suggested topics for this training are shown in **Table 5-1**.

Table 5-1 Possible training topics

Target group	Topic
Engineer(s)	③ Content and requirements of the CEMP and issue specific management plans.

Work crew	③ Content and requirements of the CEMP and issue specific management plans. ③ Management and maintenance of erosion and sediment controls. ③ Incident response.
Emergency response crew	③ The location of emergency response equipment. ③ The use of such equipment. ③ Internal notification procedures. ③ Disposal of clean up materials.

5.4 Toolbox training

Regular toolbox training will serve to keep the work staff informed of the environmental management requirements and their responsibilities. It will also provide a means by which work staff can be reminded of key issues and notified of new or previously unidentified issues as they arise. Furthermore, it will provide a formal mechanism through which work staff can ask questions or initiate discussion on issues of interest or concern. Toolbox training will be prepared and delivered by the Site Supervisor/ Site Foreman or suitable delegate.

The topics for tool box training sessions should be selected based on site or activity specific environmental risks. Example topics and objectives for toolbox training sessions are presented in **Table 5-2**. Records of toolbox talk topics and persons attending will be retained on site.

Table 5-2 Examples of tool box training topics

Topic	Objectives
Waste management	③ Reinforce reduce, reuse and recycle principles. ③ Provide relevant examples of good and bad practices. ③ Provide information of the type and location of bins and collection areas for recycling and waste. ③ Provide basic information of the classification of waste material (with reference to OEH Waste Classification Guidelines).
Noise minimisation	③ Reinforce the approved construction hours for the project including types of works and locations. ③ Briefly outline the process for obtaining approvals for out of hours works. ③ Provide information on location sensitive receivers. ③ Provide information on noise mitigation measures.
Management of hazardous materials	③ Identify the types of hazardous materials used during construction. ③ Provide information on the handling and storage requirements. ③ Provide information on the location of purpose-built storage and bunding facilities. ③ Provide information on the location and use of spill kits.
Dust control	③ Reinforce that excessive dust generation is not acceptable. ③ Provide information on potential impacts. ③ Provide information on dust mitigation measures, such as watering stockpiles, keeping stockpiles covered, and avoiding work during windy conditions. ③ Reinforce need for maintenance of plant and equipment.
Erosion and sediment control	③ Provide basics of erosion and sediment control. ③ Provide information on specific erosion and sediment control measures. ③ Reinforce that any off-site discharge of dirty water is not acceptable and that individuals may be prosecuted under POEO Act.
Work methods	③ Provide information on the Construction Method Statements. ③ Detail where these can be obtained ③ Provide specific instruction on relevant Construction Work Methods Statements for specific construction teams.

6 Monitoring, auditing, and reporting

6.1 Environmental monitoring

The requirements for environmental monitoring for the construction phases of the project are summarised in the project EMS, with further detail provided in the relevant environmental management sub-plans, including the Soil and Water Management Plan and Construction Noise Management Plan. For the general environmental issues and erosion and sediment control requirements addressed in this CEMP, the requirements for environmental monitoring are limited to the need to undertake visual observations, including general daily site observations and weekly environmental site inspections. The requirements for site inspections are detailed below.

6.2 Environmental site inspections

Daily observations of site environmental management measures and general environmental performance will be recorded in work site diaries.

Compliance with this CEMP and general environmental performance will be assessed on a weekly basis using an Environmental Site Inspection Checklist that is consistent with the example checklist attached in **Appendix B**. The purpose of the Environmental Site Inspection Checklist is to:

- ③ provide a surveillance tool to ensure that the required environmental management measures are being implemented and are effective; identify where problems might be occurring; and
- ③ facilitate the identification and early resolution of problems, including (but not limited to) the failure of existing controls, the occurrence of avoidable environmental impacts, the need for maintenance or improvement of existing controls, the need for additional controls, the need to improve construction methodologies, or the need for further tool box training.

Any non-compliances identified through the checklist process will be highlighted and entered into the Environmental Action Register (refer to example register attached in **Appendix C**). The action will remain ‘open’ until:

- ③ the issue has been resolved;
- ③ a new or revised procedure has been established and implemented; and ③ training has been provided to relevant personnel/ contractors.

Incidents that cause or threaten material harm to the environment must be reported to OEH in accordance with Section 148 of the POEO Act (refer to **Table 3-1**).

6.3 Environmental auditing

Internal audits on specific plans/procedures that are relevant to current works will be conducted every three months throughout the construction period by the Environmental Representative/ Construction Environmental Manager (or suitable delegate). Elements that may be audited include:

- ③ compliance with this CEMP;
- ③ compliance with the conditions of approval;
- ③ compliance with approval, permit and licence obligations;
- ③ compliance with Construction Method Statements;
- ③ complaint response;
- ③ response to non-compliances and non-conformances; and
- ③ system documentation, including training records and checklist completion.

The outcomes of any audit will be documented in an Environmental Audit Report and communicated to the Environmental Representative/ Construction Environmental Manager. Non-conformances, corrective actions and observations will be addressed through the same mechanisms as non-compliances, as detailed in **Section 6.4**.

6.4 Environmental non-compliance

Any non-compliances or non-conformances identified during monitoring, site inspections or audits will be managed as follows:

- ③ non-conformances and non-compliances will be identified and recorded in the Environmental Action Register;
- ③ corrective actions will be identified and implemented;
- ③ preventative actions against further occurrences will be identified and implemented;
- ③ the register will be updated to close-out the issue; and
- ③ the register will be periodically reviewed to ensure non-conformances and non-compliances are being addressed and actions completed on time.

6.5 Document and records management

6.5.1 Records

Environmental management documents and environmental management records are to be available on the project construction site in both hard copy and electronic formats so that they can be referred to or cross examined at any time throughout the construction period. The documents and records that are to be available on the construction site include the following at a minimum:

- ③ the EMS and all environmental management sub-plans, including this CEMP;
- ③ all regulatory approvals, licences and permits issued for the project;
- ③ construction Method Statements;
- ③ records of correspondence with regulatory authorities;
- ③ regulatory authority inspection reports;
- ③ employee induction and training records;
- ③ environmental monitoring results;
- ③ completed Environmental Site Inspection Checklists;
- ③ completed Environment Action Registers;
- ③ documentation relating to the notification of any environmental incidents to OEHL;
- ③ Environmental Audit Reports;
- ③ complaint reports;
- ③ community involvement information; and
- ③ CEMP review meeting minutes.

6.5.2 Document and data control

A document and data control procedure is to be implemented to control the flow of documents and data within ROBE and between stakeholders and contractors. Specifically:

- ③ documents and data that are to be issued and liable to change will be controlled to ensure that they are approved before issue and that the current issue or revision is known to and available to those requiring them;
- ③ controlled documents and data will be uniquely identified and will bear a defined revision number recorded on each page of the document;
- ③ a register and distribution list will identify the current revision of particular documents or data;

- ③ after a number of changes have been made to a document it will be withdrawn and reissued as a new revision. Data will be issued on a revision basis only; and
- ③ obsolete documents and data will be kept for contractual or other reasons but will be clearly marked “superseded”.

6.5.3 Management review

A management review of the monitoring, inspection and auditing findings will be undertaken at six monthly intervals to ensure continuous improvement of the overall system. The management review will include relevant members of senior management and other relevant staff members.

Appendix A Environmental Control Plans

Environmental Control Plan (ECP) 1: Administrative requirements

Scope	
This ECP covers environmental management documentation, approvals, staff training requirements and general site security.	
Objectives	To employ best management practices to ensure that the construction works meet environmental legislative requirements. To employ best management practices to ensure that the two bunker construction works meet environmental legislative requirements.
Targets	No identified non-compliances with Minister's Conditions of Approval (MCoA) for the project. No breach of environmental legislative or regulatory requirements. No environmental incidents causing material harm to the environment.
Approvals, licences and permits	MCoA granted under the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act). Environment Protection Licence (EPL) 13097 issued under the <i>Protection of the Environment Operations Act 1997</i> (POEO Act). Approval from Wagga Wagga City Council under Section 138 of the <i>Roads Act 1993</i> .
Additional applicable legislation	EP&A Act - Need for further environmental assessment and approval in the event of changes in project scope or scale.
Inspection and monitoring	Weekly completion of Environmental Site Inspection Checklist.

Ref	Environmental control measures and safeguards	Timing	Responsibility ¹	Source/ Reference
AR01	Ensure that the EMS, all issue specific environmental management sub-plans referred to within the EMS, and all other manage plans required under the MCoA are completed and approved.	Before start of construction	SS/ SF/EHS	MCoA

AR02	Ensure all necessary approvals, licenses and permits have been obtained.	Before start of construction	SS/ SF/EHS	MCoA CEMP Table 3-1
AR03	Ensure that all registers and checklists referred to within this CEMP have been established.	Before start of construction	SS/ SF/EHS	CEMP Chapters 4-6 and Appendices A-D
AR04	Ensure that all project personnel have completed the appropriate environmental training and that training records are kept on site.	Prior to starting work on site	SS/ SF/EHS	CEMP Chapters 5-6
AR05	Carry out weekly site inspections using the Environmental Site Inspection Checklist to check that all required environmental controls are in place, functioning and effective.	Weekly	SS/ SF ER/ CEM/EHS	CEMP Chapter 6 and Appendix A
Ref	Environmental control measures and safeguards	Timing	Responsibility ¹	Source/ Reference
AR06	Ensure that the required monitoring is undertaken in accordance with the EPL.	Refer to EPL	SS/ SF ER/ CEM/EHS	EPL 13097 CEMP Chapter 3
AR07	Ensure compliance with Section 120 of the POEO Act.	Throughout construction	SS/ SF ER/ CEM/EHS	CEMP Table 3-1 MCoA/ CEMP Table 3-2
AR08	Ensure that internal audits are undertaken at the required frequency.	Every three months	SS/ SF ER/ CEM/EHS	CEMP Chapter 6
AR09	Ensure that any non-compliances or non-conformances are addressed in a timely manner in accordance with the required corrective action procedures.	As required	SS/ SF ER/ CEM/EHS	CEMP Chapter 6
AR10	Ensure that all registers and records are kept up to date.	Throughout construction	SS/ SF ER/ CEM/EHS	CEMP Chapters 4 & 6
AR11	Ensure that any environmental incidents are responded to in accordance with the EMS and the Incident Management and Emergency Response Procedures.	As required	SS/ SF ER/ CEM/EHS	CEMP Table 3-1 and Chapters 4 & 6
AR12	Ensure that this CEMP is reviewed and revised throughout the construction period.	Every 3 months and as required	SS/ SF ER/ CEM/EHS	CEMP Chapter 4

AR13	Ensure that access to the construction site is controlled with appropriate security fencing and signage at all times throughout the construction period.	Throughout construction	SS/ SF ER/ CEM/EHS	Best practice
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1. Identifies primary responsibility for implementation. Ultimate responsibility lies with the Construction Project Manager. SS = Site Supervisor. S F= Site Foreman. ER = Environmental Representative. CEM = Construction Environmental Manager. EHS = Environmental health and safety manager.

Environmental Control Plan (ECP) 2: General environmental issues

Scope

This ECP covers general environmental issues associated with the project. Additional environmental control measures for key issues are provided in the issue specific environmental management sub-plans under the project EMS (refer to the EMS).

Objectives	To minimise potential environmental impacts through application of best practice environmental management measures and environmental due diligence.
Targets	No off-site emissions of dust. Appropriate authorities notified and adverse impacts minimised in the event that previously undiscovered Aboriginal objects, archaeological material or remains are found during construction. Appropriate authorities notified and adverse impacts minimised in the event that previously undiscovered non-Indigenous relics are found during construction. No adverse impacts on native fauna. Vegetation clearing limited to ground cover vegetation and one native tree within the project site.
Approvals, licences and permits	Minister's Conditions of Approval for the project granted under the <i>Environmental Planning and Assessment Act 1979</i>. Environment Protection Licence 13097 issued under the <i>Protection of the Environment Operations Act 1997</i> (POEO Act).

Additional applicable legislation	<i>National Parks and Wildlife Act 1974</i> (NPW Act) - Need to notify the OEH if previously undiscovered Aboriginal objects or remains are found. <i>Heritage Act 1977</i> (Heritage Act) – Need to notify DP&I Heritage Branch if previously undiscovered non-Indigenous relics are found. <i>Contaminated Land Management Act 1997</i> (CLM Act) – Need to notify the OEH if contamination is caused or discovered. <i>Noxious Weeds Act 1993</i> (NW Act) – Need to manage and control noxious weeds on the project site, including Patterson’s Curse. <i>Pesticides Act 1999</i> (Pesticides Act) – Need to ensure appropriate use of pesticides and herbicides (if used in weed control). <i>Dangerous Goods (Road and Rail Transport) Act 2008</i> (DGR&RTAct) – Applies to transport of dangerous goods to/from site. <i>Environmentally Hazardous Chemicals Act 1985</i> (EHC Act) – Applies to storage and use of hazardous chemical chemicals on site.
Inspection and monitoring	Weekly completion of Environmental Site Inspection Checklist.

Ref	Environmental control measures and safeguards	Timing	Responsibility ¹	Source/ Reference
Dust control				
DC-01	Minimise the amount of soil exposed at any one time through sequencing of construction activities and progressive stabilisation of disturbed surfaces, where practicable.	Throughout construction	SS/ SF ER/ CEM/EHS	Best practice
DC-02	Ensure erodible materials are kept covered during transportation/ haulage.	During transport of materials	All construction staff	MCoA/ CEMP Table 3-2
DC-03	Ensure stockpiles of erodible materials are kept covered or regularly wetted down to prevent dust generation.	Throughout construction	All construction staff	Best practice

DC-4	Ensure that the heights and surface areas of stockpiles of erodible materials are controlled to minimise the risk of dust generation and facilitate easy and effective application of dust suppression measures.	During creation of stockpiles	All construction staff	Best practice
DC-05	Ensure all construction plant and machinery is well maintained and operated in a proper and efficient manner to minimise emissions of particulates.	Throughout construction	SS/ SF ER/ CEM/EHS	MCoA/ CEMP Table 3-2 EPL 13097
DC-06	Avoid dust generating activities (such as clearing, grubbing, excavation and earthworks) during dry and windy conditions, where practicable.	Throughout construction	SS/ SF ER/ CEM/EHS	Best practice
DC-07	Visually monitor the construction site during the course of each work day to check for dust generation. Apply appropriate dust suppression measures, such as wetting of dust generation sources, in the event that substantial quantities of dust are being generated or off-site emissions are occurring.	Throughout construction	All construction staff	Best Practice CEMP Chapter 6 and Appendix B
Protection of previously undiscovered Aboriginal objects or remains				
AH01	If previously undiscovered Aboriginal objects (or potential Aboriginal objects) are found during construction: i) stop all works that might impact the object; ii) protect the object from further disturbance/damage; and iii) contact the ER/ CEM, who will determine the subsequent course of action. If considered to be required, the ER/ CEM will notify a suitably qualified Aboriginal heritage professional and (if required) the OEH and Local Aboriginal Land Council, to obtain advice on how to proceed. Works will only recommence once any Aboriginal heritage requirements identified through this process have been met.	As required	All construction staff	NPW Act CEMP Table 3-1 Amended SoC (Notice of Modification) CEMP Table 3-2
AH02	Staff training, including the Environmental Site Induction, will cover the importance of Aboriginal heritage, the legislative requirements for protection of Aboriginal heritage, the potential to find previously undiscovered Aboriginal objects on the construction site, and the recognition of Aboriginal objects.	Before the start of construction	SS/ SF ER/ CEM/EHS	Amended SoC (Notice of Modification) CEMP Table 3-2

Ref	Environmental control measures and safeguards	Timing	Responsibility ¹	Source/ Reference
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AH03	If suspected human skeletal material is uncovered during the course of any site works, stop all works in the vicinity of the find and contact the ER/ CEM, who will notify the OEH, NSW Police and NSW Coroners office. Works will only recommence once the requirements identified through this process have been met.	As required	All construction staff	Amended SoC (Notice of Modification) CEMP Table 3-2
Discovery of previously undiscovered non-Indigenous heritage items or relics				
HH-01	If an item that is suspected to constitute a 'relic' of non-Indigenous origin is encountered during the course of construction: i) stop all works that might impact the relic; ii) protect the relic from further disturbance/damage; and iii) contact the ER/ CEM, who will determine the subsequent course of action. If considered to be required, the ER/ CEM will notify a suitably qualified historic heritage professional and (if required) the Heritage Branch of DP&I, to obtain advice on how to proceed. Works will only recommence once appropriate clearance has been received. Under the Heritage Act, a 'relic' means any deposit, object or material evidence that: i) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement; and ii) is of State or local heritage significance.	As required	All construction staff	Heritage Act CEMP Table 3-1
HH-02	Staff training, including the Environmental Site Induction, will cover the importance of historic heritage, the legislative requirements for protection of historic heritage, the potential to find previously undiscovered relics, and the recognition of relics.	Before the start of construction	SS/ SF ER/ CEM/EHS	Best practice
Protection of flora and fauna				
FF-01	Ensure that clearing of trees is limited to the clearing requirements identified in the Environmental Assessment for the approved project, being the need to clear one tree within the project site. No additional native trees within or adjacent to the site will be cleared without prior approval.	Throughout construction	All construction staff	MCoA
FF-02	Felled trees on the project site will be left <i>in situ</i> for at least 24 hours to allow fauna species to relocate.			Amended SoC (Notice of Modification) CEMP Table 3-2

FF-03	In the event that any native animals are inadvertently injured on the construction site, contact an accredited veterinarian and/or an established wildlife care group such as WIRES.	As required	All construction staff	Amended SoC (Notice of Modification) CEMP Table 3-2
FF-04	In the event that any native animals require removal from the construction site or relocation, notify the ER/ CEM, who will then determine the appropriate course of action. This may involve contacting WWCC, OEH or an established wildlife care group such as WIRES.	As required	All construction staff	Amended SoC (Notice of Modification) CEMP Table 3-2

Ref	Environmental control measures and safeguards	Timing	Responsibility ¹	Source/ Reference
FF-05	Monitor the occurrence of weed infestations within the project construction site. In the event that a weed infestation is identified, implement appropriate weed removal and control measures in consultation with WWCC.	Throughout construction	SS/ SF ER/ CEM/EHS	Amended SoC (Notice of Modification) CEMP Table 3-2
FF-06	Ensure that any weed control measures involving the use of pesticides/herbicides are carried out only by suitably trained personnel in accordance with the product label and that records of pesticide/herbicide use are kept on site.	As required	SS/ SF ER/ CEM/EHS	Pesticides Act
FF-07	Ensure that noxious weed species such as Patterson's Curse are placed in sealed bags and disposed of either at an appropriate licensed facility or in accordance with the requirements of WWCC. For the control of Patterson's Curse, ensure that all measures implemented are in accordance with the <i>Class 4 Noxious Weed Control Management Plan 2006 – 2011</i> prepared by WWCC.	As required	SS/ SF ER/ CEM/EHS	Amended SoC (Notice of Modification) CEMP Table 3-2 Noxious Weeds Act
FF-08	Ensure that the site is rehabilitated and landscaped in accordance with the Landscape Plan, which will be prepared by an appropriately qualified practitioner in consultation with WWCC.	As per the Landscape Plan	SS/ SF ER/ CEM/EHS	MCoA
Storage and handling of hazardous chemicals and dangerous goods				

HC-01	Ensure that all hazardous substances and dangerous goods stored on the project construction site (including diesel) are stored in appropriate, labelled storage vessels or containers.	Throughout construction	SS/ SF ER/ CEM/EHS	EHC Act Best practice
HC-02	Ensure that all hazardous substances and dangerous goods stored on the project site (including diesel) are stored in appropriately signposted and bunded storage areas, with sufficient bunding to contain at least 110% of the volume of the largest container. The bunds are to be designed and installed in accordance with the OEH Environmental Protection Manual <i>Technical Bulletin Bunding and Spill Management</i> .	Throughout construction	SS/ SF ER/ CEM/EHS	MCoA/ CEMP Table 3-2 OEH Environmental Protection Manual
HC-03	Ensure that storage and handling of hazardous substances and dangerous goods is carried out in accordance with relevant codes of practice and standards including <i>Storage and handling of dangerous goods: Code of practice</i> (WorkCover NSW, 2005) and AS 1940: 1993 <i>The Storage and Handling of Flammable and Combustible Liquids</i> .	Throughout construction	SS/ SF ER/ CEM/EHS	EHC Act MCoA/ CEMP Table 3-2 <i>Storage and handling of dangerous goods: Code of practice</i> AS 1940: 1993
HC-04	Ensure that Material Safety Data Sheets are kept on site for all hazardous chemicals stored.	Throughout construction	SS/ SF ER/ CEM/EHS	EHC Act Best Practice
HC-05	Ensure that the transport of dangerous goods to the project construction site is carried out by an appropriately licensed contractor in accordance with relevant legislation and codes of practice, including the Australian Dangerous Goods Code, 7 th Edition (National Transport Commission, 2007).	Throughout construction	SS/ SF ER/ CEM/EHS	DGR&RTAct Australian Dangerous Goods Code
Ref	Environmental control measures and safeguards	Timing	Responsibility ¹	Source/ Reference
HC-06	Ensure that suitable and functioning spill kits are maintained at suitable, readily accessible locations on the project site in close proximity to areas where chemicals and fuels are stored or handled) and that personnel are trained in their use.	Throughout construction	SS/ SF ER/ CEM/EHS	Amended SoC (Notice of Modification) CEMP Table 3-2
HC-07	Inspect plant and equipment on a daily basis to check and promptly rectify any leakages of fuel, oil, hydraulic fluid or grease.	Throughout construction	SS/ SF ER/ CEM/EHS	Best practice

Minimisation of the visual impacts of construction				
VI-01	Ensure that the construction site is maintained in a tidy condition, with all materials confined and stockpiled within the site boundaries.	Throughout construction	SS/ SF ER/ CEM/EHS	Best practice
VI-02	Ensure that any external lighting required for the construction phase is be mounted, screened and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadway in accordance with Australian Standard AS4282(INT) 1997 <i>Control of Obtrusive Effects of Outdoor Lighting</i> .	Throughout construction	SS/ SF ER/ CEM	MCoA/ CEMP Table 3-2
VI-03	No advertising signs or structures that can be seen from the nearest public space will be erected on the premises without appropriate approval.	Throughout construction	SS/ SF ER/ CEM	Best practice
Management of environmental incidents				
EI-01	Ensure that environmental incidents are managed in accordance with the Incident Management and Emergency Response Procedures that have been prepared for the construction phase of the project.	As required	All staff	MCoA
EI-02	Ensure all personnel receive training on the Incident Management and Emergency Response Procedures.	As required	SS/ SF ER/ CEM/EHS	Best practice
EI-03	The OEH must be notified in the event of any incidents that cause or threaten material harm to the environment.	As required	SS/ SF ER/ CEM/EHS	POEO Act/ CEMP Table 3-1
EI-04	The OEH must be notified if construction activities result in contamination of land or discovery of existing contamination.	As required	SS/ SF ER/ CEM/EHS	CLM Act/ CEMP Table 3-1

1. Identifies primary responsibility for implementation. Ultimate responsibility lies with the construction Project Manager. SS = Site Supervisor. S F= Site Foreman. ER = Environmental Representative. CEM = Construction Environmental Manager. EHS = Environmental health and safety manager.

Appendix B Example Environmental Site Inspection Checklist

Example Environmental Site Inspection Checklist

Note: This checklist is an example only. A project-specific checklist is to be developed by the proponent. The project-specific checklist must serve to assess the environmental performance of the construction phase of the project in terms of the targets and requirements identified in the project CEMP, in particular the targets and requirements identified in the Environmental Control Plans contained within Appendix A of the CEMP.

Areas Inspected:	Wagga Wagga bunker and stormwater pond construction.		
Date:		Time:	
Person undertaking inspection:			
Description of on-site activities			

N/A	Items	Satisfactory		Action Priority			Brief description of required action	Initial and date for close-out
		Yes	No	1 < 24 hr	2 < 3 days	3 < 7 days		
Erosion and sediment control								
☐	Silt fencing/ socks / diversion drains	☐	☐	☐	☐	☐		
☐	Sediment control basins	☐	☐	☐	☐	☐		
☐	Stormwater drain protection	☐	☐	☐	☐	☐		
☐	Protection to water bodies	☐	☐	☐	☐	☐		
☐	Erosion controls	☐	☐	☐	☐	☐		
Dust control								
☐	Loads covered	☐	☐	☐	☐	☐		

ROBE Integrated Oilseed Processing Plant

N/A	Items	Satisfactory		Action Priority			Brief description of required action	Initial and date for close-out
		Yes	No	1 < 24 hr	2 < 3 days	3 < 7 days		
☐	Stockpiles protected	☐	☐	☐	☐	☐		
☐	Site road surface adequate	☐	☐	☐	☐	☐		
☐	Dust/emissions controlled	☐	☐	☐	☐	☐		
☐	Public roads clean (no soil tracked on road)	☐	☐	☐	☐	☐		
☐	Revegetation and rehabilitation	☐	☐	☐	☐	☐		
Aboriginal heritage								
☐	Identification of sites	☐	☐	☐	☐	☐		
☐	Protection of sites	☐	☐	☐	☐	☐		
Flora and fauna								
☐	Protection of retained trees	☐	☐	☐	☐	☐		
☐	Maintenance of drainage	☐	☐	☐	☐	☐		
☐	Storage at base of trees	☐	☐	☐	☐	☐		
Hazardous materials								
☐	Bunded storage fuel/chemicals	☐	☐	☐	☐	☐		
☐	Refuelling machinery	☐	☐	☐	☐	☐		
☐	Spill procedure/kit	☐	☐	☐	☐	☐		
Public protection								
☐	Site secured and lockable	☐	☐	☐	☐	☐		
☐	Work area/secured	☐	☐	☐	☐	☐		

ROBE Integrated Oilseed
Processing Plant

Other items	Priority	Actions required	Closed
Dust pollution due to grading bunker surface on a windy day.	High	Use the water truck more often of as required to damp the dust generated from grading.	Yes
Stormwater run off to the neighbouring property due to damaged silt fencing.	High	Fix or replace damaged silt fence to ensure no sediment flows to the neighbouring property.	Yes

Appendix C Example Environmental Action Register

Example Environmental Action Register

Issue	Priority	Action	Responsibility for Action	Date to be completed	Sign Off
Dust pollution due to grading bunker surface on a windy day.	High	Use the water truck more often of as required to damp the dust generated from grading.	Bunker construction supervisor and environmental manager	As required	Environmental manager.
Stormwater runoff to the neighbouring property due to damaged silt fencing.	High	Fix or replace damaged silt fence to ensure no sediment flows to the neighbouring property.	Environmental manager.	As required.	Environmental manager.

Appendix D Example Emergency Contacts Form

Example Emergency Contacts Form

Personnel/ Organisation	Contact name	Contact number	Address
Environmental Representative/ Construction Environmental Manager			
NSW Police			
NSW Fire Brigade			
NSW Ambulance Service			
Wagga Wagga Hospital			
Rural Fire Services			
Poisons Information			
Local waste collection and spill clean up contractor services			

Wagga Wagga City Council			
Office of Environment and Heritage			
Department of Trade and Investment (Agriculture)			
Department of Planning and Infrastructure			

Appendix E: Consent management and mitigation measures

General	The proponent shall prepare and implement the following management plans for the project: – A Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan, which incorporate an Erosion and Sediment Control Plan. – A Traffic Management Plan (TMP) shall be prepared prior to site establishment and construction. The TMP shall incorporate a Transport Code of Conduct, which would outline and manage the transportation routes to the site for heavy vehicles and B-doubles. The TMP would also include: • Heavy vehicle access to the site. • Deliveries and dispatch of products. • Heavy vehicle parking. • Internal speed limits. • Use of truck turnaround areas. – Landscape Management Plan detailing requirements for roadside landscaping and planting to minimise distant views and enhance near views from Byrnes Road and Trahairs Roads, including monitoring and maintenance of landscaping. – An Energy Savings Action Plan in accordance with the requirements of DECCW and the Guidelines for Energy Savings Action Plans (DEUS 2005). The Energy Savings Action Plan would include details of greenhouse gas abatement measures and energy efficiency measures for the operation of the proposed IOPP. – A Procurement Plan for palm oil shall be implemented prior to commencement of operation which must: • Identify environmentally and socially responsible feedstock materials. • Include procedures for the sourcing of such feedstock. • Include evidence of legal sourcing of feedstock. • Contain procedures for regular review of suppliers.	Review and update of exiting CEMP. All construction vehicles will enter sight at designate gate, follow the sites traffic management plan “the use of the ring road” . The Landscape management plan will be updated.
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Hazards and risks	The proponent shall ensure that fire hoses on the site are fitted with a foam generation attachment at each plant area where flammable and combustible liquids are stored and handled. A storage of at least 20 L of Fluorine Free Firefighting Foam concentrate shall be maintained at locations where a foam generating attachment is held.	The site has fire hydrants with 20L foam as part of our firefighting procedure.
Visual	The proponent shall prepare a Landscape Management Plan, which will consider local endemic species and accommodate future land uses and receptors in the area.	The Landscape management plan will be updated.
	The Landscape management Plan will be updated to consider the Planting palates outlined in the Wagga Special Activation Precinct Master Plan.	The Landscape management plan will be updated to incorporate the planting of trees “Eucalyptus Blakley” at the Burns roadside. Prior to the commencement of operation of grain storage bunker.
	The proponent shall ensure that landscaping is undertaken in accordance with the Landscape Management Plan.	The Landscape management plan will be updated.

	The Byrnes Road tree screen will be enhanced and maintained to a constant tree height of 8 m.	The Landscape management plan will be updated.
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Noise	Regular noise monitoring, including attended monitoring, will be undertaken during operations at surrounding receivers to determine noise levels generated by the project. If exceedances are detected during monitoring, amelioration measures will be investigated by ROBE to ensure that noise criteria are met.	A noise monitoring assessment will be done for MOD 8 “in progress”. The site also has a sound level meter that they can use to measure the noise levels if required.
Flora and Fauna	undertake regular weed monitoring and control weeds in accordance with the General Biosecurity Duty under the Biodiversity Act 2015.	Exiting weed monitoring and control program will be adequate and is already in place.
	The Landscape Management Plan shall incorporate species endemic to the area. <u>Species selection will also reference the Wagga Special Activation Precinct Master Plan.</u>	The Landscape management plan will be updated.

Dust emissions	A dust control protocol will be implemented to reduce dust by using a water truck, look at the wind speed and direction when working on the bunkers. Have the water truck running every hour if required , and if dust emissions is high we will do more water spraying. There will be a water truck on site that has a capacity of 18 000l of water and it can be filled up on site when required. On windy day with a wind speed of 30Km/h construction work on the bunkers will reduce, work that generates minimal dust will rather be done that heavy vehicle construction. Compacting the ground after it has been level will also reduce dust emissions during construction.	Construction.
Chemical spills	A general 240l chemical spill kit will be kept close to the construction of the bunker to be used in case of a chemical spill during production.	Construction.
Fuel ignition risk	All trucks, vehicles will be inspected as part of the weekly site inspection to reduce the risk of fuel igniting. All vehicles will be maintained to ensure they are not a safety or a risk to the environment.	Construction.
Noise	All vehicles will be fitted with a silencer to reduce noise from those vehicles, operations will only be done during day time and not during night times. A sound level meter will be used in site if noise levels sound loud. Also schedule noisy activities to reduce noise.	Construction
Water quality impact.	A general 240l chemical spill kit will be kept close to the construction of the bunker to be used in case of a chemical spill during production.	Construction

	Enlargement of the storm water pond to accomidate additional rain water run off from the bunkers contruction site. A silt fence will be erected around the contruction site “Bunker” to prevent any water run off to the neighbering property. Review and update the storm and water management plan as part of our soil and water management plan.	
Visual	The Landscape management plan will be updated to incorporate the planting of trees “Eucalyptus Blakley” at the Burns roadside. 100 Blakley red gum “Tubes” will be planted to fill in the gap in the tree fence over a period. The aim of planting these trees is to ensure a constant tree height of 8 metre which will be achieved in about 4-5 years, Blakley red gum trees grows about 1.5-2m per year.	Construction
Aboriginal and nonaboriginal heritage.	If suspected human skeletal material is uncovered during the course of any site works, stop all works in the vicinity of the find and contact the EHS, who will notify the GM operations, and NSW Police. Works will only recommence once the requirements identified through this process have been met. This will include aboriginal an on aboriginal remains, potential aboriginal items or objects, archaeological relics, moveable objects and items (as defined by section4(10 of the heritage Act 1977).	Construction
Biodiversity	A biosecurity protocol will be implemented if a threatened flora and fauna not previously recorded on site are detected on site during construction. If any threatened flora and flora is detected on site during construction, all construction activities will stop and the EHS manager will be notified. General Biosecurity duties.	Construction

Weed control and the spread of weed during construction.	Any soil disturbance will be avoided as much as possible to minimise the potential for spreading weeds. Weed control spray will be done one month before construction of the bunkers and two months after the completion of the bunkers. The majority of the disturbed soils will be re-use in the cut and fill during the construction of the bunkers.	Construction
Waste Management.	All waste generated on site will be: ➤ Avoided where possible. ➤ Reused, if possible, on site. ➤ If all alternative is not possible the waste will be disposed of by a licensed waste management contractor "Smallman's brothers". ➤ Waste generated by this modification will be minimal.	Construction