



ENVIRONMENTAL MANAGEMENT PLAN – WAREHOUSE 4B MOOREBANK LOGISTICS PARK JULY 2020

ATS Building Products Pty Ltd ABN: 86 149 787 431

Person responsible for this WOEMP: Sean McNabb

Document Control				
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Acronyms and Definitions

Acronym / Term	Meaning
ADG	Australian Code for the Transport of Dangerous Goods by Road & Rail (National Transport Commission, Edition 7.6, 2018)
AQMP	Air Quality Management Plan
CoC	Condition(s) of Consent
DPIE	NSW Department of Planning, Industry and Environment (Previously DP&E)
EMC	Estate Management Company. Entity responsible for management of warehouse operations.
Environmental Incident	A set of circumstances resulting in harm, or potential harm, to the environment. Environmental incidents include pollution incidents and environmental emergencies. Environmental incidents may arise from natural (e.g. storm, wind or bushfire) or human factors.
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence under the POEO Act
IMEX	Import Export Terminal
Material harm	Material harm is harm that: <ul style="list-style-type: none"> • Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or • Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).
MLP	Moorebank Logistics Park
Moorebank Logistics Park	Refers to the entire Moorebank intermodal precinct, i.e. the MPE and the MPW.
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
NVMP	Noise and Vibration Management Plan
OEH	Office of Environment and Heritage
Qube OEMP	Qube's' Precinct (MPE) Wide Operational Environmental Management Plan
OTAMP	Operational Traffic and Access Management Plan
PDC	Project Delivery Company. Entity responsible for delivery of the MPE development.
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Pollution Incident	A set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).
SSD	State significant development
WOEMP	Warehouse Occupation Environmental Management Plan - ATS

1. INTRODUCTION

1.1 BACKGROUND

ATS Timber (ATS) is committed to ensuring that our business remains respectful of the environment in which we operate in. Our business will always strive to minimise our environmental footprint and prevent the likelihood of environmental incidents so far as is reasonably practicable.

This Warehouse Operations Environmental Management Plan (WOEMP) details how the environmental management requirements for our storage and distribution operation (in Moorebank) will be implemented and managed on site by ATS Building Products.

The aim of the WOEMP is to document processes for implementation which are compliance with environmental legislation and that environmental risks associated with the operation are properly managed.

1.2 SITE DESCRIPTION

The Moorebank logistics park is located 35 kilometers (South West) from the Sydney central business district. The site is located at Warehouse 4 of the Moorebank Logistics Park Precinct on Moorebank Avenue in Moorebank (Shown in Figure 1). ATS's operations are contained within the southern half of the warehouse, known as Warehouse 4B.



Figure 1: Location of Warehouse 4B

ATS's operations mainly consist of Warehousing, including the transport, storage and management of timber and construction materials.

Warehouse 4 covers a total area of 23,405m². Warehouse 4A covers an area of 10,905m². ATS's operations are currently limited to Warehouse 4B which covers an area of 12,501m² (Operational boundary indicated in red in figure 2). The Warehouse is owned by Qube, with ATS Leasing section 4B of the warehouse. A plan showing the extent of the site and surrounding areas is attached in Figures 2 and 3.

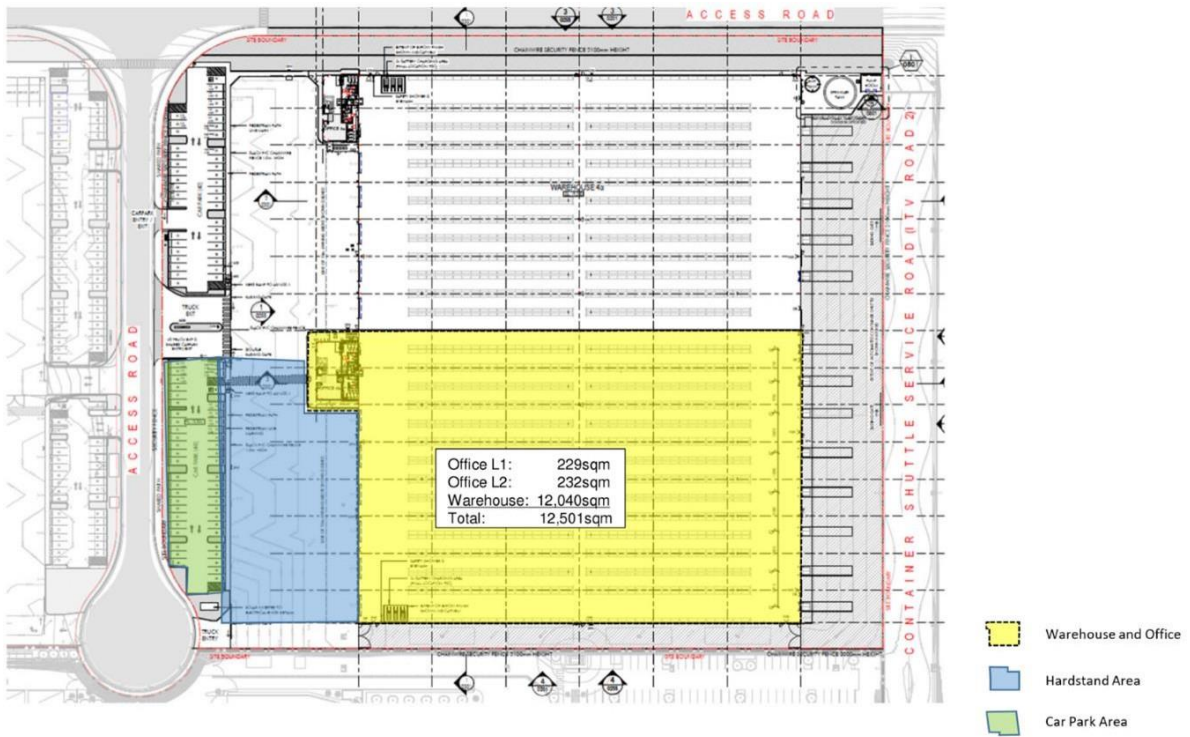


Figure 2: Layout of Warehouse 4B

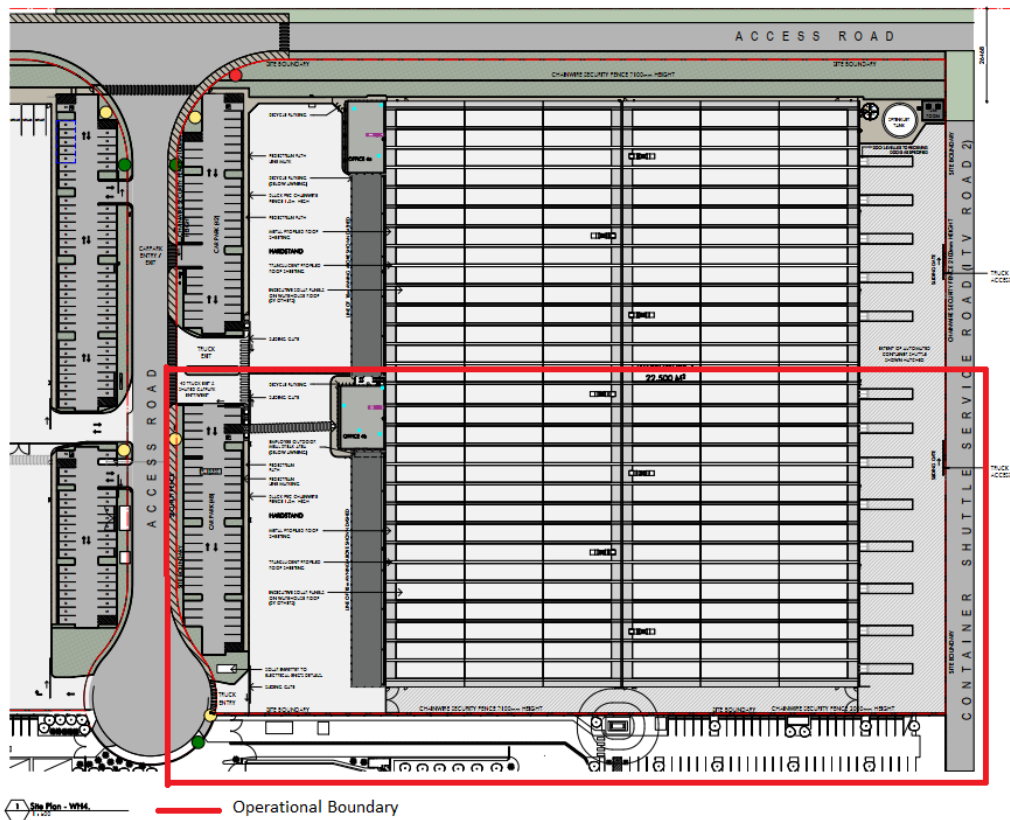


Figure 3: Operational boundary of Warehouse 4B

1.3 SITE ACTIVITIES

The activities and operations at the site are, but not limited to the following:

- Supplying the following products to customers:
 - Structural timbers
 - Engineered wood products
 - Formwork materials
 - Treated Pine
 - Decking and flooring
 - James Hardie products
 - Kitchens and installations
 - Steel beams fabrication
- Storage and distribution of building products
 - Receipt and dispatch of goods from and to the IMEX terminal
 - Packing and unpacking of containers
 - Short-term storage of goods
 - Truck movements in and out of warehouse
 - Forklift operation
 - General office administrative and support functions
- Retail and wholesale trade sales
- De-termite timber treatment line
- Cutting of timber products to size
- Typical operating hours 5am – 10pm Mon - Sat
- Approximately 30 staff onsite across two shifts
- General building/premises upkeep and maintenance including open space use, ancillary warehouse use, integrated building signage and lighting and waste management areas.

General precinct infrastructure will be managed by Qube under the OEMP and includes pavements, stormwater detention and water quality treatment structures and devices, landscaping and lighting, and emergency services. Qube will also have operational control of the currently vacant Warehouse 4A, common areas and assets outside the leased operational boundary indicated in Figure 2.

1.4 ENVIRONMENTAL MANAGEMENT PLAN CONTEXT

This Environmental management plan has been developed in accordance with State and Federal legislative obligations, our company environmental policies and company guidelines. Where Codes of Practice or other similar references have been utilised in this document they will be mentioned at that point.

1.5 ENVIRONMENTAL MANAGEMENT PLAN OBJECTIVE

This Warehouse Operations Environmental Management Plan (WOEMP) is a site-specific plan developed to document appropriate environmental management practices to be followed during a project or normal site operations. ATS will utilise this plan to assist in mitigating our environmental impact and prevent environmental incidents.

The objectives of this WOEMP are:

- to comply with applicable environmental legislation.
- Demonstrate and facilitate compliance with conditions of consent, as instructed by the NSW Planning Department:
 - C3, C6, C7 and B114
- minimise damage to the environment caused by ATS's operations and site;
- comply with environmental guidelines and requirements;
- to implement relevant environmental safeguards correctly; and
- to monitor the sites environmental impact.

1.6 POTENTIAL ENVIRONMENTAL IMPACTS FROM OPERATIONS

An Environmental Risk assessment has been undertaken by ATS to determine the environmental aspects and impacts and to identify the environmental risk profile of Warehouse operations. Environmental Risks (Aspects/Impacts) were also drawn from the QUBE environmental documentation. These risks, aspects and impacts were summarised into operational control areas, to allow the development of suitable environmental mitigation measures and objectives for the contract.

ATS has established a Risk Register to identify the environmental risks, aspects and impacts associated with operations. This involved the consideration of normal and abnormal operating conditions, start-up and shut-down conditions, as well as foreseeable emergency situations. The following risk matrix shall be applied in the preparation of the Hazards Register:

Likelihood (L) of Occurrence		
1	Rare	An incident is unlikely to occur
2	Unlikely	An incident is unlikely to occur in the next 5 years
3	Moderate	An incident could be expected to occur in the next year
4	Likely	An incident could be expected in the next 6 months
5	Almost Certain	An incident is expected to occur during the next month
Consequence (C) of Result		
1	Insignificant	No injury, or Minor first aid, or no environmental impact
2	Minor	First aid injury, or negligible environmental impact
3	Moderate	Medical treatment required, or environmental impact contained
4	Major	Lost time injury, or Some detrimental impact on environment
5	Catastrophic	Death or permanent disability, or Major impact on environment

Likelihood	Consequence				
	1	2	3	4	5
5	H	H	E	E	E
4	M	H	H	E	E
3	L	M	H	E	E
2	L	L	M	H	E
1	L	L	M	H	H

E = Extreme	H = High
M = Moderate	L = Low

To be effective the Risk Register has been developed in consultation with staff from all relevant operational areas. The ranking (or determination of significance) for each risk is based on the following:

- The Hazard (that which may cause harm), which may be controlled by elimination or substitution
- The Pathway (how harm may occur), which may be controlled by engineering or administrative controls
- The Impact (the nature of the harm that may occur), which may be controlled by measures such as spill control equipment and emergency response procedures.

This analysis directs the correct application of the hierarchy of controls.

Assessed risks were assigned a risk control priority in accordance with the table below.

Hazard Risk Rating	Priority for Control
Extreme	Immediate application of controls or cease operation until it can be appropriately controlled.
High	To be appropriately mitigated within the time of the shift, work or task time and a permanent control within 3 months.
Medium	Within 6 months.
Low	When an appropriate alternative can be sourced.

Figure 1 - Risk Assessment

Aspect	Impact	Risk
Air quality	Dust and emissions from Operations	Medium
Stormwater, Erosion and Drainage Management	Potential Impact: Site erosion and sediment laden water or contaminated stormwater leaving the site	Low
Noise and light pollution controls	Potential disturbance to neighbours	Medium
Litter and Waste Management surrounding Warehouse	Potential waste and litter around MLP	Medium
Surface and Ground water quality	Potential waterway contamination	Low
Hazardous Substances and Dangerous Goods	N/A	N/A
Energy, Water and Resource Consumption	Overconsumption of Energy, Water or Resources.	Low
Traffic	Traffic disturbance or incidents	Low
Flora and fauna	Disturbance to flora and fauna. Native vegetation	Low
Incident	Pollutants to air, land and water	Medium

ATS recognises the potential environmental risks and impacts arising from the activities described in point

1.3. These include, but are not limited to:

- Dust emission as an ongoing concern.
- Potential waterway contamination
- Chemical spill or loss
- Ongoing levels of hazardous noise
- Pollutants, including air, land and water and
- Expulsion of harmful gases through the use of motor vehicles and other powered equipment.

1.7 ENVIRONMENTAL POLICY - CORPORATE

Company name: ATS Building Products
Officer name: Sean McNabb
Date of issue: 01 July 2020
Date of review: 01 July 2021 POLICY STATEMENT

As part of our commitment to achieving the principles of responsible environmental management, sustainability and protection of the natural environment, we recognise our moral and legal responsibility to minimise our environmental footprint, and to ensure that our activities, products and services do not place the natural environment or the local community at risk of harm.

AIMS AND OBJECTIVES

We are committed to environmental sustainability and prevention of pollution. We will achieve this by working with our customers, subcontractors, suppliers, and the community to adopt procedures that –

- take significant environmental aspects and impacts into account throughout our operations
- use energy and natural resources wisely and efficiently, eliminate and minimise waste, and re-use and recycle where practicable
- reduce polluting substances produced by our operations, activities, products, or services
- minimise the impact of our operations on the neighbouring community
- increase the use of environmentally acceptable materials, equipment, and technology in place of those which are considered harmful
- ensure that our suppliers follow acceptable environmental policies, and
- actively promote environmental awareness among workers, clients, subcontractors, customers, and the general public.

RESPONSIBILITIES

We recognise that the overall responsibility for environmental sustainability rests with management, who will be accountable for the implementation of this policy. These responsibilities include –

- ensuring that all environmental policies and procedures are implemented
- establishing measurable objectives and targets to ensure continued improvement aimed at the elimination of waste, pollution, and environmental harm
- encouraging consultation and co-operation between management, workers and stakeholders in matters which may affect or impact on the environment; and
- providing adequate resources to meet these

environmental commitments. Workers also have responsibilities, which include –

- following all environmental policies and procedures; and
- recognising and reporting hazards which may affect the health and well-being of the environment.

SIGN OFF

Signed: _____

Date: _____

2. ENVIRONMENTAL MANAGEMENT

2.1 ENVIRONMENTAL MANAGEMENT STRUCTURE AND RESPONSIBILITY

Responsibility for Precinct environmental management sits with Qube in its function as the Project Delivery Company (PDC), established under arrangement with the Commonwealth Government. The PDC is the entity responsible for delivering the development and is also tasked with the ongoing maintenance and environmental performance and reporting of the Precinct once it has been developed.

Qube has the additional responsibility of demonstrating tenancies do not exceed any hazardous materials screening thresholds in accordance with the Hazardous and Offensive Development Application Guidelines Applying SEPP 33 (Department of Planning, January 2011) as specified in CoC B114 and C6(b) for this WOEMP. This responsibility is considered further in section 4.3 of this WOEMP.

Qube has broad responsibility for site environmental management of operations and will work with ATS to support the achievement of the site environmental management objectives. This responsibility includes review of ATS's activities that have an interface with the common site environment and management controls, such as stormwater and drainage controls, and facilitating access to performance monitoring and reporting data that supports site-wide reporting obligations under the WOEMP and CoC, including management of noise and air emissions.

Warehouse tenants - ATS, have responsibility for general building/ premises upkeep and maintenance, including any open space or ancillary warehouse use, integrated building signage and lighting and waste management.

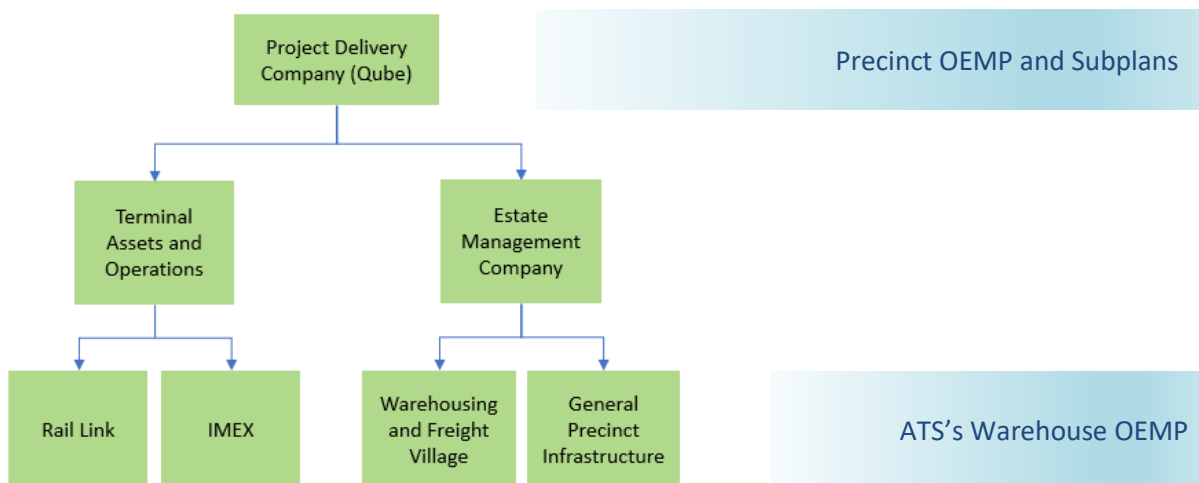


Figure 4 - Precinct management structure

The overarching QUBE OEMP identifies the operational environmental management measures that will be implemented across the site for all site functions. Figure 3 shows the relationship between Qube, in its role as PDC and EMC, and ATS as the warehouse tenant. The WOEMP is identified as an environmental management plan operating beneath the QUBE OEMP and focused on the warehouse operation.

The relationship between Qube's OEMP, required under CoC C3, and ATS's WOEMP, required under CoC C6, is demonstrated in Figure 4.

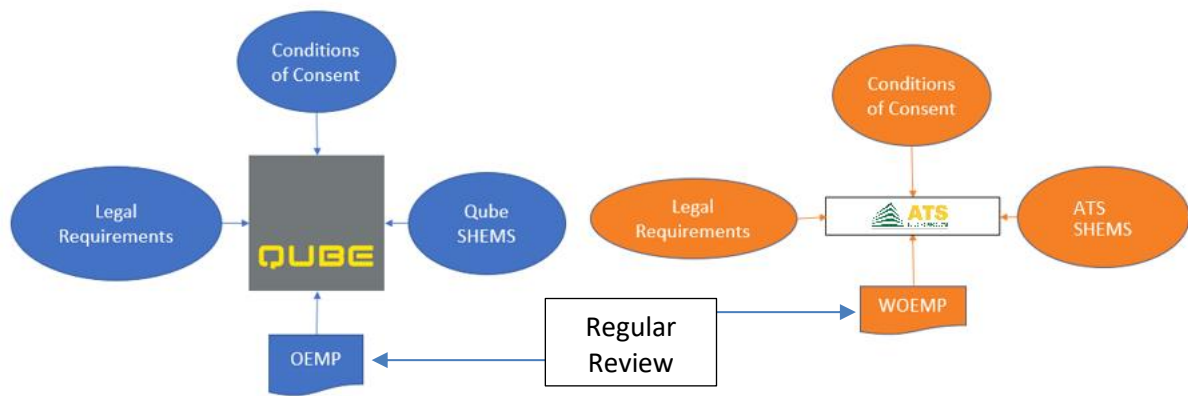


Figure 5 - Relationship between Qube's OEMP and ATS's WOEMP

Figure 5 identifies that ATS's WOEMP is:

- Aligned to the SSD 7628 conditions of consent
- Influenced by Qube's legal requirements and Safety Health and Environmental Management System (SHEMS) and
- In accordance with the QUBE OEMP.

Figure 5 also demonstrates that the WOEMP has been prepared to address ATS's legal requirements and its own SHEMS or integrated management system (IMS). The WOEMP identifies a reporting and monitoring output to the QUBE OEMP to enable Qube/EMC to fulfil its monitoring, reporting and publication requirements under the CoC. Quarterly reviews of The WOEMP and QUBE's OEMP will ensure that the two plans remain complementary and compliant.

2.1.1 ENVIRONMENTAL MANAGEMENT RESPONSIBILITY

The principle responsibilities of ATS Building Products Directors and Workers, with respect to the environment, are described below. The management structure is set out in the following diagram. A matrix of specific site responsibilities is set out in Table 1 below.

Chief Executive

Responsibilities

- Promoting and maintaining good environmental management.
- Facilitate the effective implementation of the EMP
- Approve changes to the WOEMP
- Provide support to the Site Manager and hold them accountable for their specific responsibilities

Site Manager

Responsibilities:

- Primary contact in relation to environmental performance of the warehouse
- Taking all practical measures to ensure the site is operating according to this EMP, and without risks to the environment.
- Notify Qube of any environmental spill or pollution incidents
- Manages and responds to noise/Community complaints.
- communicate outcomes of monitoring, reporting, incidents, inspections, investigations and audits
- For taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions.
- Including environmental considerations in monthly site inspections, with records maintained as a result.
- Ensuring that general building/ premises upkeep and maintenance occurs for the site, including any open space or ancillary warehouse use, integrated building signage and lighting and waste management.

Site Supervisor

Responsibilities:

- Inducting all workers and subcontractors and directing site activities in accordance with this EMP
- Detecting any site or worker non-compliance, or environmentally jeopardising conditions.
- Assisting the site Manager to conduct workplace inspections in accordance with the relevant time period and ensuring records are kept as a result
- If the Site Supervisor does not have the necessary authority to fix a problem, they are responsible for reporting the matter promptly and recommending remedial action

Workers

Responsibilities:

- All workers are required to attend site inductions
- Follow the direction of this EMP
- Recognise and report and environmental incidents or hazards
- Undertaking general building/ premises upkeep and maintenance for the site, including any open space or ancillary warehouse use, integrated building signage and lighting and waste management as required.
- Advising the Site Manager of any potential environmental issues

Customers

Responsibilities:

- All subcontractors engaged to perform work for ATS Building Products are required, as part of their contract, to comply with this EMP and to comply with directions from the company's designated officers.
- Failure to comply will be considered a breach of the contract and sufficient grounds for termination of the contract.

Table 1 - Project Environmental Roles & Responsibilities Matrix

1 = has responsibility for the overall implementation and / or management of the process/procedure on the project

2 = has responsibility for complying with the process/procedure

ATS TASK	Chief Executive	Site Manager	Site Supervisor	Workers	Subcontractors
Inducting workers and subcontractors and directing site activities in accordance with the EMP.	2	2	1	2	2
Identifying, assessing and eliminating any non-compliance or environmentally risky conditions and documenting the risk controls implemented.	1	1	2	2	2
Promoting and maintaining good environmental management in accordance with the relevant environmental legislation, regulations and laws.	1	1	2	2	2
Implementing practical measures to ensure the site complies with the ATS WOEMP, Qube's OEMP, Hazard and Risk Management Plan and Emergency Response Plan.	2	1	2	2	2
Maintaining, providing updates and supplying this EMP to relevant authorities and workers.	1	2	2	2	2
Ensure general building/ premises upkeep and maintenance occurs for the site, including any open space or ancillary warehouse use, integrated building signage and lighting and waste management facilities.	1	1	2	2	2

Monitoring and assessing subcontractors for the project to ensure environmental regulations are met and relate to the works undertaken	2	2	1	2	2
Maintaining stocks for environmental control	2	1	1	2	1
Provide and maintain a hazardous substance register for hazardous substances used and stored in the workplace;	1	1	1	2	2
Provide and maintain records (e.g. waste, water and energy usage) and provide Qube with documentation of environmental inspections, incidents and procedures if requested.	2	2	1	2	2

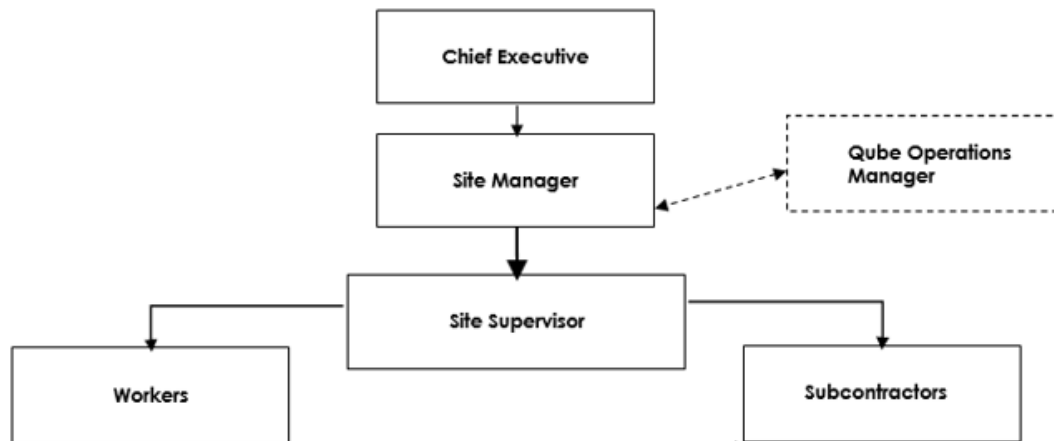


Figure 6 - Environmental Management Responsibility

2.2 APPROVAL AND LICENSING REQUIREMENTS

Licenses, permits and approvals required for this site are summarised in attachment 1 and the table below. ATS will ensure that any licenses, permits and approvals are obtained. A relevant licence, permits, conditions and approvals are included in Attachment 1 of this EMP.

Table 2 Summary of Licenses, permits and approvals

Regulatory Authority	Licence / Permit / Approval Type	Status	Summary of Key Conditions and Monitoring Required
DPIE	SSD 7628 CoC	Compliant	Refer to Attachment 1
NSW EPA	EPL 21054	Compliant	Refer to Attachment 1

2.3 REPORTING

The Site Manager will ensure control of all project environmental documentation and reports. Adequate records will be maintained to demonstrate conformance to specified environmental requirements. The records to be maintained include, but not be limited to, the following:

- monitoring and inspection records (conducted monthly)
- non-conformance, corrective action, and preventive action
- complaints management
- training and induction records
- audit records
- permits, licenses, and approvals

These documents will be maintained within the company intranet.

ATS Building products will also ensure that external reports that are required to be provided to Qube, regulators and other stakeholders are completed as required.

2.4 ENVIRONMENTAL TRAINING

All ATS Building Products workers who will be working onsite shall receive site-specific induction training. The induction training will include:

- familiarisation with the requirements of this EMP.
- familiarisation with Qube's OEMP for MLP Precinct East
- environmental emergency response training
- identification and education on the key environmental concerns for the area, as well as any relevant national environmental significance
- familiarisation with site environmental controls, including how to manage an environmental emergency response
- community expectations and complaints management procedure, as well as potential consequences of mismanagement of our environmental management in accordance with this EMP.

ATS Building Products will combine the Work Health and Safety (WHS) and Environmental induction into one. A record of the site induction will be made on the Site Environmental Induction Register (see Attachment 2). Our records for environmental training will include details such as: name, date, the provider of the training and a brief summary of the topics included.

2.5 ENVIRONMENTAL INCIDENTS

Environmental incidents are classified as either reportable or non-reportable:

- Reportable incidents are those that cause actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or where results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000. All Class 2 and Class 3 incidents described in Table 4 4:, are reportable.
- Non-reportable incidents are those that do not trigger the threshold but have the potential to impact on human health and the environment (Class 1 incidents in Table 4 4).

All significant environmental and pollution incidents occurring within Warehouse 4B shall be reported immediately to the:

- QUBE Operations Manager
- Estate Area Manager (depending on the location of the incident)
- Qube Site HSEQ Manager / Advisor

Qube's Site HSEQ Manager / Advisor will maintain a register of accidents, incidents and potential incidents with actual or potential significant off-site impacts on people or the biophysical environment.

ATS will ensure it complies with all relevant aspects of QUBES environmental incident procedure outlined in the QUBE OEMP.

2.5.1 EMERGENCY CONTACTS AND RESPONSE

This EMP sets out ATS Building Products management of environmental emergencies during the project. It includes:

- contact details for emergency services (e.g. ambulance, fire brigade, spill clean-up services)
- the location of on-site information on hazardous materials, including SDS (Safety Data Sheets) and spill containment material
- instructions and contact details for notifying the Site Supervisor, EPA, local council, nearby residents, or the community if necessary.

2.5.2 KEY EMERGENCY RESPONSE PERSONNEL

The Site Manager will be the first point of contact when an incident or spill occurs. They can be contacted 24 hours a day. Contact details including emergency services are included in the table 3 below:

Table 3 - Emergency Response Contact Details

CONTACT	TELEPHONE	ADDRESS
Qube Site Manager (KF)	M:+61 404 608 790	Qube Moorebank logistics Park – MPW site office
Ambulance, Fire or Police	000	
Poisons Information	13 11 26	
SafeWork NSW	13 10 50	
Rural Fire Service	(02) 9603 7077	Corner Alderney St and Townson Ave, Minto 2566
Liverpool Hospital	(02) 8738 3000	Corner of Elizabeth and Goulburn Streets, Liverpool, NSW 2170
Site Manager	(02) 9630 5622	
National Operations Manager	04 2645 3533	
Water	132 203	
Electricity	132 090	
Gas	131 388	
All relevant Emergency Procedures and Contact details will be held in the ATS Administration area of Warehouse 4B.		

2.5.3 DANGEROUS GOODS/HAZARDOUS SUBSTANCES & COMPLIANCE WITH CONDITIONS OF CONSENT

ATS Building Products DO NOT Store or Transport in any quantity:

- Dangerous Goods; or
- Hazardous Chemicals.

Should this status change, ATS will implement all relevant dangerous goods and hazardous substances storage (including bunding) and handling requirements in line with the conditions of consent and EPA technical guidance. The WOEMP will be altered accordingly and environmental inspections and audits will ensure this status will remain.

2.5.4 EMERGENCY RESPONSE PROCEDURES:

FIRE EMERGENCY

Steps to manage a fire emergency:

- Call '000' as soon as possible
- If safe to do so leave the work area. If unsafe to leave, seek refuge in a safe area immediately
- Go to the designated Emergency Assembly Area or to a clear/open area
- Make sure all workers are present and accounted for, do not return to the work area to locate any missing workers; and
- Notify the Site Supervisor and wait for instructions.

GAS LEAK EMERGENCY

Steps to manage a gas leakage emergency:

- Call the Site Supervisor immediately, if deemed necessary call the Fire Brigade on '000'
- Site Supervisor to immediately arrange to turn off the gas supply
- Site Supervisor to turn off the site's electrical supply
- If deemed necessary, notify all persons to evacuate the work area and assemble at the Emergency Assembly Area
- Control the movement of people to the Emergency Assembly Area
- Check all workers and others are in attendance; and
- Remain at the Emergency Assembly Area until notified that the area is safe to reoccupy.

LEAK OR SPILL EMERGENCY

Steps to manage any Leak or Spill in a work site:

- Identify the source of the problem
- Stop goods leaking
- Contain spilt material, using spills kit or sand
- Notify officer or Site Supervisor
- Remove spilt material and place in sealed container for disposal (if possible); and
- Site Supervisor to record incident. OR
- as suggested on Safety Data Sheet (SDS)

3. IMPLEMENTATION

3.1 Risks

The risk(s) to the environment involved in this project have been considered when devising this management plan in section 1.6. The outcomes of this process have provided our business with mitigation strategies to control the risks identified. A documented risk assessment outlining our environmental risks has been documented and completed in accordance with this EMP (Refer to section 1.6).

The controls for each of the recognised risks has been outlined below.

3.2 Environmental Risk Management Activities

The following environmental management activities, mitigation and control measures will be adopted to prevent or minimise environmental impacts.

3.2.1. AIR QUALITY

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Emissions of air pollutants from motor vehicles & plant		
ATS will carry out general building/premises upkeep and maintenance including regular maintenance of machinery. Workers instructed not to leave machinery idling when not in use.	Site Supervisor	In accordance with manufacturer's specifications
Procedure for Reporting dust/emission incidents or complaints from the community. Any complaints will be recorded, promptly investigated, and addressed in accordance with Qube requirements.	Site Supervisor	Ongoing
An air sampling activity will be conducted by an occupational hygienist if the levels of exhaust gas are reported as hazardous by workers	Site Supervisor and Management	Review after 1 month after commencement
Where dust is generated (eg. Cutting timber) , from site operations the work area/stock and or equipment will be watered down or cleaned	Site Supervisor	Ongoing
If levels of dust are deemed to be hazardous, an air sampling activity will be conducted by an occupational hygienist to review this and provided recommendations	Site Manager	Review after 1 month after commencement
Workers will be provided with Personal Protective Equipment (PPE) as part of our risk management strategy to manage dust levels	Workers Site Supervisor	Ongoing Checked during daily pre-start meetings

3.2.2. STORMWATER, EROSION & SEDIMENT CONTROL

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Site erosion and sediment laden water leaving the site		
After heavy rain, all sediment and erosion controls and drains will be checked.	Site Supervisor	After rain amounts that exceed 10mm in a 24-hour period

3.2.3. WATER QUALITY

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Contamination of water due to chemicals, fuels or wastes		
Safety Data Sheet (SDS) of hazardous substance will be referred to when spills occur (If bought on to site).	Site Supervisor	In event of Spill SDS's are reviewed annually for compliance with date requirements
Maintenance of existing stormwater infrastructure and drainage will be programmed by Qube (MID plumbing) to be conducted, where possible, during dry weather periods, with adequate temporary diversions in place during the transition period.	Site Supervisor QUBE	In event of Spill SDS's are reviewed annually for compliance with date requirements
Inspect Carparks regularly for oil staining or leaks from parked vehicles or operations to avoid contaminated water running off and entering stormwater drains.	Site Supervisor	After rain amounts that exceed 10mm in a 24-hour period

3.2.4. TRAFFIC

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Parking and access to site		
The QUBE OTAMP (Operational Traffic Management Plan) has been developed to manage all vehicle movements onsite. ATS operations will have minimal impacts upon traffic.	Site Manager	Plan will be reviewed within one month of commencement
Any traffic incidents will be referred to QUBE.	Site Supervisor	When required

3.2.5. WASTE MANAGEMENT

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Unacceptable disposal of site waste		
All material waste will be recorded in the Waste Register.	Site Supervisor	Upon receipt and/or disposal
All waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997	Site Supervisor	When required

Appropriate space will be provided for the temporary storage of garbage, recyclable and compostable waste to ensure separation of waste products.	Site Supervisor	As part of site design Reviewed annually
On-going checks will be carried out to ensure correct separation and re-use of recyclable materials is being maintained. Ongoing checks of waste receptacles and storage areas.	Site Supervisor	Monthly Inspections
Waste to be secured and maintained within designated storage areas	Site Supervisor	Monthly Inspections
No receipt of wastes generated from off-site	Site Supervisor	Monthly Inspections
Retention of waste sampling and classification data	Site Supervisor	Monthly Inspections
Collection of wastes between 7 am and 10 pm Monday to Friday	Site Supervisor	Monthly Inspections
No hazardous or regulated waste would be disposed of on site.	Site Supervisor	Monthly Inspections
All hazardous and/or intractable wastes are to be disposed of in accordance with the relevant Authority and EPA requirements.	Site Supervisor	Monthly Inspections

3.2.6. NOISE

Control Measure	Responsibility	Timing / Frequency
Potential Impact: Unacceptable noise levels and vibrations		
Regular maintenance and inspection of plant and equipment for noise emissions. Use quieter and less vibration emitting operations methods and equipment where feasible and reasonable.	Site Manager	Ongoing
Include noise, vibration and light component of the site induction and toolbox talks	Site Manager	Ongoing
Non-tonal reversing beepers (or an equivalent mechanism) must be fitted and used on all warehouse vehicles and mobile plant regularly used on site	Site Manager	Ongoing
Procedure for Reporting noise, vibration and light incidents or complaints from the community. Any complaints will be recorded, promptly investigated, and addressed in accordance with Qube requirements.	Site Manager	Ongoing
Work equipment will be maintained in good working order to comply with EPA guidelines. Where required, noise suppressors will be installed.	Site Supervisor	In accordance with manufacturer specifications
Work will take place during nominated business hours only.	Site Manager	Ongoing

3.2.7. Flora and Fauna

Landscaping and plants within the Warehouse 4 area are managed by P&E an external contractor for Qube. Warehouse operations are unlikely to disturb flora and fauna. QUBE's OEMP has sections relating to this and any flora and fauna incidents will be referred by the site manager to QUBE.

3.3 Environmental Control Plan

Further to Section 3.2, key features of environmental management for this site have been described in additional control plans. These include the following:

- Site Planning:
 - environmentally sensitive areas on and adjacent to the site
 - waterways and drains
 - erosion and sediment controls
 - vegetation requiring protection.
 - Any monitoring locations; and
 - General building/premises upkeep and maintenance inspections.
- Traffic Management Planning (development of traffic management plan), which includes:
 - work areas, machinery or vehicle parking,
- Waste Management Planning (development of waste management plan)
 - waste management areas, fuel and chemical stores
- Emergency Planning (development of site emergency response procedures)
 - Spill containment and response

3.4 Environmental Schedules

This EMP refers to a number of environmental schedules comprising forms, registers and checklists. They are listed below and included in Attachment 2.

1. Site Environmental Induction Register
2. Site Environmental Inspection Checklist
3. Environmental Complaint Form
4. Non-Conformance Report Form
5. Hazardous Substances Register
6. Safety Data Sheets (SDS) Register
7. Waste Register

4. MONITOR AND REVIEW

4.1 Environmental Monitoring

ATS Building Products will monitor the environmental controls listed in Section 3.2 through regular site environmental inspections. Unless otherwise stated, environmental site reviews are conducted monthly by the Site Supervisor as part of the overall site inspection activities. Other compliance inspection checks are conducted; however, these are more specifically related to detailed issues or activities (such as the compliance with PPE requirement).

Site environmental inspections will be undertaken on at regular intervals or as required to monitor the requirements of this plan. Inspections will be recorded by the Site Supervisor on the Site Inspection Checklist (see Attachment 2).

4.2 Environmental Auditing

Planned and documented audits aimed at evaluating the environmental conformance of our Moorebank site will be carried out by ATS Building Products. Any deficiencies identified during the audits shall be documented and actioned in accordance with the ATS Building Products corrective action process (see Section 4.5). Furthermore, the audit program will determine whether the EMP has been properly implemented and maintained onsite. Final Audit documentation and findings will be provided to Qube on completion or if requested.

In addition, any relevant findings, corrective actions or non-conformances arising from QUBE (External) audits will be communicated by the Property manager to the ATS Site supervisor.

The audits to be carried out and their frequency are listed in table below:

Audit Type	Frequency	Record	Auditor
Environmental Management Plan	6 Monthly	Audit Report	Site Manager
Site Environmental Inspection	Monthly	Site Environmental Inspection Checklist	Site Supervisor

4.3 Communication

To minimise impacts on the public by our site, residents and adjacent property owners will be notified in advance writing before any new or additional works commence and at appropriate stages during any project undertaken in the future by ATS Building Products. The letter will contain:

- details of the intended work,
- the duration of the activities,
- information regarding any access interruptions and details of whom to contact with questions regarding the work.
- The Project Manager will seek permission if there is any need to access private property.

ATS Building Products will undertake external and on-site communication in case of environmental incidents and emergencies, including communication with subcontractors. External communication will include informing nearby residents of proposed work, incidents and emergencies and contacting regulatory agencies if required.

4.4 Complaints

Community groups, clients, interested parties, etc. are encouraged to advise of practices, activities and processes that are related to the environment by a variety of methods. These may include:

- A non-conformance report, fax/letter, telephone complaint, newspaper/magazine report and verbal protest.

On receipt of a complaint, the person receiving the complaint will notify the Chief Executive and the complaint will be recorded using the Environmental Complaint Form (see Attachment 2). The Site Manager will follow up the complaint and take corrective action as required.

4.5 Non-Conformance & Corrective Action

A non-conformance occurs when a procedure or environmental control is not followed or does not perform as required by this EMP. ATS Building Products will monitor non-conformances to the EMP and initiate corrective and preventive action/s where required. All non-conformances will be recorded on a Non-Conformance Report Form (see Attachment 2).

ATS Building Products will undertake corrective action/s in when incidents that have had an environmental impact. Procedures for identifying corrective action include:

- An EMP review
- An investigation into the causes of incidents and recording of the results; and
- Evaluating further environmental risks.
- In accordance with the requirements of CoC C11 – C17, non-conformances that are also considered to be an incident or warrant notification would be provided to Qube Estate Management.

4.6 Environmental Management Plan Review

This EMP will be reviewed by the Site Manager as required to ensure its continuing suitability and to ensure it is conforming to the EMP's environmental objectives and legal requirements.

Reviews will be undertaken annually or as a result of any of the following:

- when there is a change in the operations onsite which requires a change to environmental controls
- in the event of an environmental incident that relates to ATS Building Products
- when there is a need to improve performance in an area of environmental impact
- at the completion of environmental audits as required; &
- as a result of changes in environmental legislation (applicable to our business activities)

Changes to the Environmental Plan

- Reasons for making changes to the EMP will be documented.
- A copy of the original EMP document will be kept within company records.
- The Chief Executive and Site Manager are authorised to change and re-issue the EMP
- The Site Supervisor is to be informed of any changes made
- The Site Supervisor is responsible for ensuring the staff are complying with the current EMP, and for informing staff of any changes.

4.6.1 ENVIRONMENTAL MANAGEMENT PLAN REVIEW SCOPE

The annual review scope will include (but is not limited to) the following:

- Compliance with legislation
- Are procedures are being followed (site inspection)
- Mitigation measures specified in this EMP are being implemented and remain adequate and appropriate
- Training and induction records are in order
- Environmental reports are being completed and any actions implemented and closed out
- Environmental incidents are being recorded, actioned and closed out
- Environmental objectives are being achieved

4.6.2 ENVIRONMENTAL MANAGEMENT COMPLIANCE REPORT

ATS Building Products will prepare an 'Annual Environmental Management Compliance Report' which will detail how we have complied with the

- Conditions of Consent (CoC); &
- The Environmental Management Plan

The report will be supplied to Qube Estate Management on a six-monthly basis and form part of the overarching compliance report that Qube will submit to the DPIE in accordance with COC C21.

4.7 Environmental Management Records

All documentation received, generated or stored pertaining to environmental matters will be managed in accordance with our document management procedure. Environmental records, which are collated and held onsite to demonstrate compliance with environmental obligations will include:

- Training and induction records
- Environmental incident reports
- Complaint records
- Non-conformance reports and corrective action plans
- Environmental monitoring data and reports
- Environmental site inspection checklists
- Plant and equipment maintenance, inspection and calibration records
- Internal environmental audits
- External environmental audits
- Monthly reports and data tracking e.g. waste, environmental performance and
- Record of pesticide/herbicide use.

ATTACHMENTS: ENVIRONMENTAL DOCUMENTATION

1. Site Environmental Induction Register
2. Site Environmental Inspection Checklist
3. Environmental Complaint Form
4. Non-Conformance Report Form
5. Waste Register
6. Environmental licenses, permits and approvals

1. SITE ENVIRONMENTAL INDUCTION REGISTER

Record of persons receiving environmental induction for this site

Site _____ **Date** _____
Address _____ **Telephone** _____
Name of Inductor _____
Topics Covered _____

I have attended this induction and have read and understood the environmental rules of this site and EMP.

Date	Worker Name	Induction Number (e.g. general induction card, license)	Worker Signature	Supervisor

Trainer Sign off

Signed: _____

Date: _____

2. SITE ENVIRONMENTAL INSPECTION CHECKLIST

PROJECT DETAILS

Site: _____
Contact Name: _____ **Telephone:** _____
Email: _____ **Date:** _____

ENVIRONMENTAL ISSUES

Stormwater, Erosion and Sediment Control	Yes	No	N/A	Comments
Have materials been contained or placed in designated areas to be away from stormwater drains/runoff?				
Are designated washout areas in place away from storm water drains?				
Is relevant protection in place surrounding flora to stop any damage?				
Is the site maintained and cleared away daily of all soil, earth, mud, clay that may cause an environmental issue?				
Waste Management	Yes	No	N/A	Comments
Has a Waste Management Plan been created and implemented?				
Have stockpiles or designated waste areas been created?				
Is the waste being stored in such an area as not to pollute or contaminate stormwater drains?				
Have excess materials been recycled, reused or returned?				
Hazardous Materials	Yes	No	N/A	Comments
Are spill kits available and held on site?				
Are spills attended to and cleaned up immediately?				
Is there a designated storage area for hazardous materials where leaks cannot flow to open ground or drains?				
Are all hazardous material containers sealed properly and no leaks evident?				
Are Safety Data Sheet (SDS) on site for all hazardous materials?				
Air Quality	Yes	No	N/A	Comments
Does all plant and equipment comply with the relevant codes and emission standards for air quality?				
Noise Management	Yes	No	N/A	Comments
Are procedures in place to minimise noise to workers, site and surrounding areas.				
Does all plant and equipment comply with the relevant codes, guidelines and standards for noise control?				

Company Representative Name: _____ **Signature:** _____

Date: _____

3. ENVIRONMENTAL COMPLAINT FORM

Project Name: _____ EC Number: _____
 Address: _____ Date: _____
 EC issued to: _____ EC issued by: _____

ENVIRONMENTAL COMPLAINT DETAILS

Environmental Incident			
<input type="checkbox"/> Pollution	<input type="checkbox"/> Potential pollution		
<input type="checkbox"/> Other: _____			
DETAILS OF COMPLAINT			
Name:		Address:	
Position:		Contact No	
NATURE OF COMPLAINT			
<input type="checkbox"/> Dust	<input type="checkbox"/> Vibration		
<input type="checkbox"/> Noise	<input type="checkbox"/> Soil contamination		
<input type="checkbox"/> Water	<input type="checkbox"/> Plant/machinery		
<input type="checkbox"/> Pollution	<input type="checkbox"/> Waste		
<input type="checkbox"/> Flora/fauna	<input type="checkbox"/> Erosion and sediment controls		
	<input type="checkbox"/> Other: _____		
INCIDENT DETAILS			
Location of incident:		Time:	
		Date:	
Description:			

Conditions of site when complaint occurred:			

Corrective or preventive action to be taken to fix the complaint	Responsible person	Date to be completed by	
_____	_____	_____	
SIGN OFF			
Corrective or preventive action is complete and dealt with by the responsible person noted above			
Name:		Date:	
Signature:	_____		
Site Manager agrees corrective or preventative is complete			
Name:		Date:	
Signature:	_____		

4. NON-CONFORMANCE REPORT FORM

Project Name: _____ NCR Number: _____
 Address _____ Date: _____
 NCR issued to: _____ NCR issued by: _____

NON-CONFORMANCE DETAILS

Area of Non-Conformance

<input type="checkbox"/> Site Establishment	<input type="checkbox"/> Work Health and Safety
<input type="checkbox"/> Works outlined in contract	<input type="checkbox"/> Environmental Management
<input type="checkbox"/> Supplier	<input type="checkbox"/> Quality Management
<input type="checkbox"/> Customer complaint	<input type="checkbox"/> Other:

Description of Non-Conformance

Outline the evidence obtained for Non-Conformance

Corrective or preventive action to be taken to fix the Non-Conformance

Responsible person

Date to be completed by

Sign Off

Corrective or preventive action is complete and dealt with by the responsible person noted above

Name:		Date:	
Signature:			

ATS Building Products agrees corrective or preventative is complete

Name:		Date:	
Signature:			

6. ENVIRONMENTAL LICENCES, PERMITS AND APPROVALS

ATS will comply with all legislative and regulatory requirements pertaining to warehouse operations aligned with the requirements of CoC A20 which restates this general obligation. ATS operations are undertaken in accordance with SSD 7628 CoC and EPL 21054.

The Table below summarises the conditions pertaining to warehouse operations and where they are addressed in this document.

Condition Type	Requirement	Document Reference (Where Addressed)
CoC SSD 7628 General		
A2 – A4	Terms of consent defining operation of development.	Qube OEMP and Compliance Tracker
A12	Use of warehousing and distribution facilities	This WOEMP section 1.3
A32	Plant and equipment maintained and operated in a proper and efficient condition and manner.	This WOEMP section 3.2.3
C6	Preparation of WOEMP.	This WOEMP
C7	Form and content requirements of management plans.	This WOEMP section 1.4
Operational Traffic		
B26 – B27	Operate in accordance with the Operational Traffic and Access Management Plan	Qube OTAMP and WOEMP Section 3.2.4
Air Quality		
B59	Operate in accordance with the Operational AQMP	This WOEMP section 3.2.1
B60	Operation to not cause or permit emission of any offensive odour	This WOEMP section 3.2.1
B61	Installation and operation of plant and equipment to comply with limits, air quality criteria and air monitoring requirements	This WOEMP section 3.2.1
Operational Noise		
B79	Operation is permitted 24 hours 7 days per week.	This WOEMP section 3.2.6
B83	Operate in accordance with the Operational Noise Management Plan	This WOEMP section 3.2.6
B84	Noise assessment for mechanical plant required prior to construction – to be considered on any change or upgrade to plant and equipment.	This WOEMP section 3.2.6
B85	Noise monitoring of mechanical plant and other noisy equipment following occupation of each warehouse. Preparation of a Monitoring Report for Mechanical Plant within two months of occupation to verify predicted mechanical plant and equipment noise levels.	This WOEMP section 3.2.6
B89	Heavy vehicles not permitted to use Moorebank Avenue south of the East Hills Railway corridor	This WOEMP section 3.2.6
Dangerous Goods		
B112	Storage and handling of all chemicals, fuels and oils, including Dangerous Goods as defined in the Australian Code for the Transport of Dangerous Goods by Road & Rail.	Not Applicable

Condition Type	Requirement	
B113	The Applicant (the operator/occupant of each premises) must ensure compliance with the Environment Protection Manual for Authorised Officers: Bunding and Spillages (EPA, 1997) and that for liquids, a minimum bund volume of 110% of the largest single stored volume within the bund is required. (refer to section 3.2.5)	Not Applicable
B114	The quantities of dangerous goods present at any time within each premises and to the development must be kept below the screening threshold quantities as set out in the Department's <i>Hazardous and Offensive Development Guidelines Application</i> (SEPP 33 (January 2011))	Not Applicable
B115	Dangerous Goods compliance report required prior to occupation.	Not Applicable
B116	Emergency Response Plan	Not Applicable
Mitigation Measures– 7e, 7f	Should Handling of dangerous goods <u>become necessary</u> including unpacking and storage within works are to be undertaken in accordance with the Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW 2005) in addition to the measures at Qube will be undertaken.	Not Applicable
Mitigation Measures– 7G	Staff involved in the transport and handling of dangerous goods within the site would receive training regarding the contents of the dangerous goods and their responsibilities. All training would be recorded and maintained in accordance with the competent authority (SafeWork NSW).	Not Applicable
Mitigation Measures– 7I	Should Storage of flammable/combustible liquids within the Amended development it would be carried out in accordance with Australian Standard AS 1940: Storage of Flammable and Combustible Liquids. Secondary containment measures would be located away from waterways and drainage paths/infrastructure.	Not Applicable
Mitigation Measures– 7J	An Operational Hazard and Risk Management Plan would be developed for the entire operational area and be implemented as part of the WOEMP for the Amended development. The plan would be reviewed regularly and updated should goods entering the site. The plan would adopt the requirements of the Code of Practice for Storage and Handling of Dangerous Goods (WorkCover NSW 2005).	Not Applicable
Mitigation Measures– 7M	Should it be identified at a future stage that a tenant or tenants require storage within the proposal site, screening test would be undertaken in accordance with the Code of Practice for Storage and Handling of Dangerous Goods (WorkCover NSW 2005).	Not Applicable
Waste Management		
B121	Waste to be secured and maintained within designated storage areas	This WOEMP section 3.2.5
B122	Lawful disposal of wastes	This WOEMP section 3.2.5
B123	Assessment and classification of wastes prior to removal from site	This WOEMP section 3.2.5
B124	No receipt of wastes generated from off-site	This WOEMP section 3.2.5
B125	Retention of waste sampling and classification data	This WOEMP section 3.2.5
B126	Collection of wastes between 7 am and 10 pm Monday to Friday	This WOEMP section 3.2.5
Mitigation Measures– 7L	No hazardous or regulated waste would be disposed of on site.	This WOEMP section 3.2.5
Mitigation Measures–	All hazardous and/or intractable wastes are to be disposed of in accordance with the Environment Protection Authority and EPA requirements.	This WOEMP section 3.2.5
Mitigation Measures–	All hazardous waste removed from site will be disposed of in accordance with the Environment Operations Act 1997 (POEO ACT 1997).	This WOEMP section 3.2.5
Mitigation Measures–	Safety Data Sheet (SDS) of hazardous substance will be referred to if spillage occurs.	This WOEMP section 3.2.5
Mitigation Measures–	All hazardous substances will be recorded in the Hazardous Substances Register and recorded in the Safety Data Sheets (SDS) Register.	This WOEMP section 3.2.5

Incident Management		
C11 – C12	Notification of incidents	This WOEMP section 2.5
C13	Preparation of incident reports	This WOEMP section 2.5
C14	Compliance with directions to address the cause or impact of an incident	This WOEMP section 2.5
C15	EPA notification to be provided to the Secretary.	This WOEMP section 2.5
MM 7K	Appropriate testing, alarm systems and work, health and safety (WHS) procedures implemented for the safety of personnel and infrastructure.	This WOEMP section 2.5
Non-compliance Notification and Reporting		
C16	Non-compliance notification to the DPIE	This WOEMP section 4.5
C17	Content expectations for non-compliance notification	This WOEMP section 4.5
Compliance Monitoring and Tracking		
C21	Compliance monitoring and reporting aligned to the Compliance Report Requirements (DP&E, June 2018)	This WOEMP section 4.1