Snowy Hydro Limited
Kurri Kurri Power Station
Waste Management Plan

Revision No.: 3.1
Revision Date: 28 November 2025

snowyhydro

Acknowledgement of Country

Snowy Hydro acknowledges the traditional custodians of Wonnarua Country, where this Management Plan applies. We pay our respects to Elders of the past, present, and emerging for they have, are, and will leave their footprints behind and continue to share their history, culture and traditions.

Document Control

Document Details	
Title:	Kurri Kurri Power Station Waste Management Plan
Revision:	3.1
Date:	28 November 2025
Author:	Trevor Thompson
Position:	Senior Environmental Advisor
Company:	Snowy Hydro Limited

Document History Prior to Approval:

Revision	Date	Description	Prepared	Checked	Reviewed	Approved
Final	20 Dec 2021	Final	A Horan	P Horn	M Luger	K Ivanusic
Amended Final	28 Dec 2021	Final	A Horan	I Smith	M Luger	K Ivanusic

The initial management plan was prepared by Jacobs and Snowy Hydro, and approved by the Department for the Hunter Power Project (now Kurri Kurri Power Station). Details of the review process are detailed in the document history table above. Subsequent versions of the approved management plan have been updated by Snowy Hydro in consultation with the Department's Environmental Representative as required and the reasons for the management plan updates are detailed in the table below.

Approved Management Plan Revision History:

Approved Revision	Revision Date	Description of Changes	Author	Date Approved
01	28 Dec 2021	Previously referred to as Amended Final	A Horan	2 Mar 2022
02	29 Dec 2023	Updated in response to approval of Modification 2 on 16 November 2023	R Vazey and A van der Kroft	13 Feb 2024
03	18 Aug 2025	Formatting and content updated for the KKPS operational stage	T Thompson	23 Sep 2025
3.1	28 Nov 2025	Updated in response to DPHI review of Revision 3	T Thompson	

Table of Contents

1.0 Introduction

This Waste Management Plan (Waste MP) has been prepared for the Kurri Kurri Power Station (KKPS) as a subplan to the overarching Operational Environmental Management Plan (OEMP) for the facility.

The objective of this Waste MP is to mitigate the the impacts and risks associated with the generation of waste and consumption of resources during the operational phase for the Kurri Kurri Power Station through:

- Identifying key waste streams
- Outlining key strategies for implementation to manage waste related impacts
- Assigning the responsibilities relevant to waste management
- Providing associated environmental governance and assurance activities associated with the implementation of this Waste MP
- Establishing a waste monitoring program and management measures
- Maximising awareness of waste management issues relevant for HP workers, and to avoid or mitigate the potential impacts associated with the generation of waste or its management.

Additional to the above objectives, this Waste MP provides a point of reference to ensure the the effective implementation of KKPS' waste related commitments, reporting, controls and mitigation measures specified in:

- The KKPS Environmental Impact Statement (EIS)
- Any written directions from the NSW Secretary of the Department of Planning, Housing and Infrastructure (DPHI Secretary);
- The conditions of NSW Infrastructure Approval SSI-12590060 (SSI Approval);
- The conditions of Environment Protection Licence 21627 (EPL21627), and;
- The conditions of the Federal EPBC Approval 2021/8888 (EPBC Approval).

Condition C1 of the SSI Approval, requires Snowy Hydro Limited (Snowy Hydro), as the proponent of KKPS, to prepare an Environmental Management Strategy (prepared as an OEMP), which includes a Waste Management Plan as a subplan to the OEMP, to the satisfaction of the Secretary (of DPHI).

1.1 Environmental Management Framework

Snowy Hydro's integrated management system incorporates Health, Safety, Environment, Quality and Asset Management frameworks to meet business requirements. The system is referred to within Snowy Hydro as the Clean, Green and Safe (CGS) Management System, and is certified to:

- ISO 9001 Quality Management Systems
- ISO 14001 Environmental Management Systems
- ISO 45001 Occupational Health & Safety Management System
- ISO 55001 Asset Management Systems

This Waste MP and the overarching OEMP are underpinned by, and align with the wider CGS Management System.

2.0 Overview

2.1 Location

KKPS is located at Loxford, near Kurri Kurri, New South Wales (NSW), within the Cessnock City Council Local Government Area (refer to **Figure 2.1**, and **Figure 2.2**). The facility has been constructed on the site of the former Kurri Kurri Aluminium Smelter, which operated from 1969 to late 2012, closing in 2014.

Figure 2.3 presents the SSI & EPBC Approval boundary for KKPS, overlaid with the EPL boundary.

The site address is 1 Hart Road, Loxford, and is approximately 1.2km from the M15 Hunter Expressway. The site is accessed via Hart Road.

Further details on the Location of KKPS can be found in the KKPS OEMP.

Figure 2.1: *Location of the Kurri Kurri Power Station within the regional context (image source: NSW Spacial Services, SDT Explorer)*

Figure 2.2: *Local context of Kurri Kurri Power Station (image source: NSW Spacial Services, SDT Explorer)*

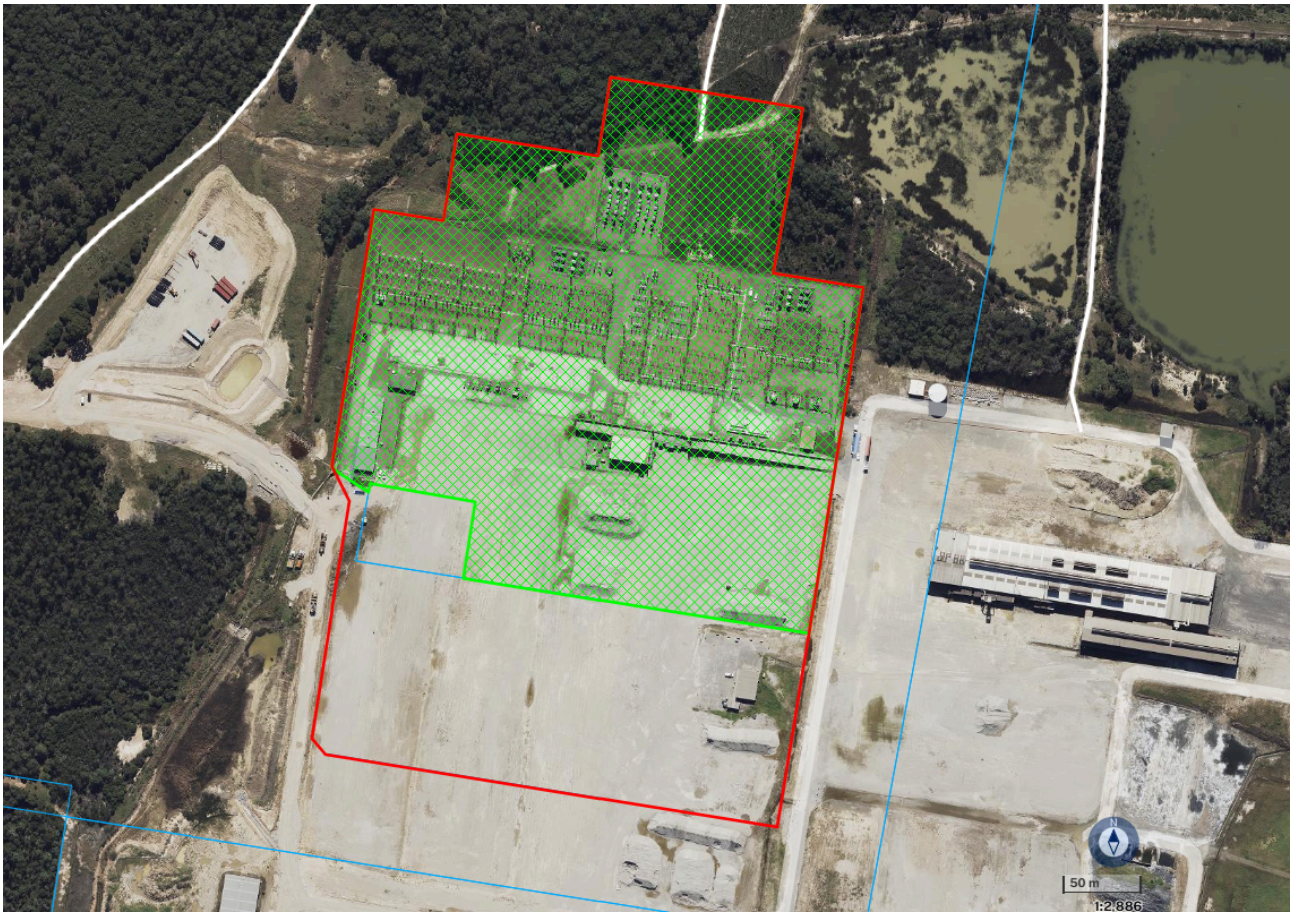

Figure 2.3: *Kurri Kurri Power Station boundaries as identified in the SSI and EPBC Approvals (red outline), and EPL21627 (green hatch), (image source: NSW Spacial Services, SDT Explorer)*

2.2 Existing Environment, Surrounding Land Use and Sensitive Receptors

KKPS is located entirely within a former industrial area, on land formerly occupied by the Kurri Kurri aluminium smelter, which ceased operations in 2012, and closed permanently in 2014.

For full details on the existing environment, land use surrounding KKPS and sensitive receptors, please refer to the KKPS OEMP.

2.3 Site Operations

KKPS is a 660MW open cycle gas fired power station that operates as a 'firming' generation facility. It is capable of supporting the transition away from fossil fuel baseload generation, through the security of supplying electricity during periods of low and intermittent generation from renewable generators to maintain a reliable and stable National Electricity Market (NEM). It can also support the NEM at short notice and during times of peak demand, including unplanned supply shortages at other baseload generation facilities.

Further details regarding the site operations of KKPS can be located in the KKPS OEMP.

2.4 Key Site Components and Features

Full details of the key site components of KKPS can be located in the KKPS OEMP.

A site layout of KKPS is provided below in **Figure 2.4**.

2.5 Environmental Policy

Snowy Hydro's Environmental Policy is reviewed and updated regularly and can be found in the Snowy Hydro document management system, intranet site (the Grid), and on the public Snowy Hydro website. The link to the public website is provided below.

https://www.snowyhydro.com.au/about/corporate-governance/

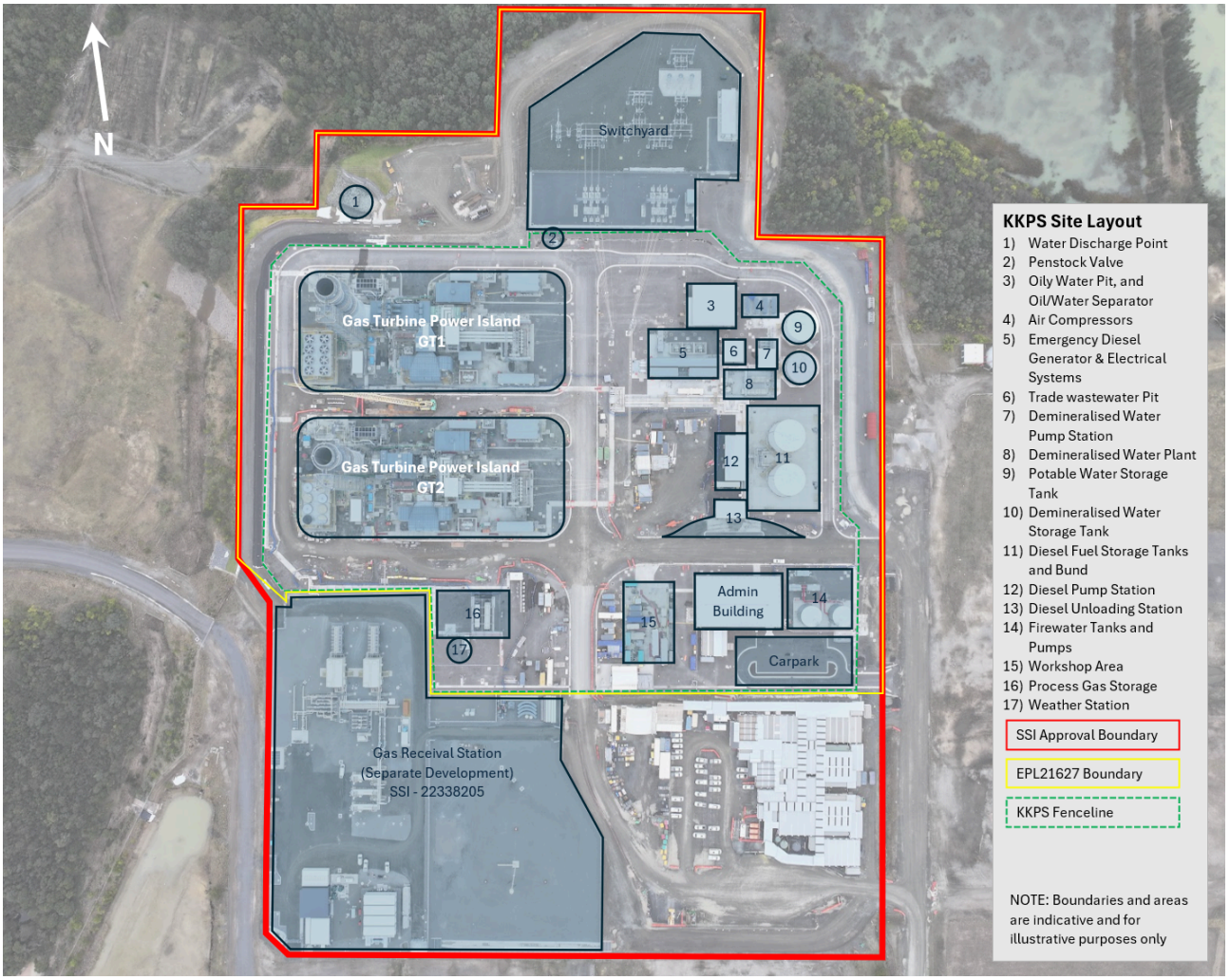

Figure 2.4: *Kurri Kurri Power Station Site Layout*

3.0 Legislative Compliance

3.1 Applicable Legislation

This Waste MP has been prepared in consideration of the relevant legislative and regulatory requirements of waste management in NSW. Refer to **Table 3.1** below.

Further details on relevant legislation applicable to KKPS can be found in the OEMP.

Table 3.1: *Summary of relevant waste related legislation*

Legislation	Key Requirements	Where/how addressed
Environmental Planning and Assessment Act 1979 (EP&A Act)	The EP&A Act establishes a systematic framework for environmental planning and the assessment of development applications in NSW, including State Significant Infrastructure	State Significant Infrastructure Approval Conditions (SSI-12590060) have been incorporated as relevant into the Waste MP
Protection of the Environment Operations Act 1997 (POEO Act)	Part 5.2: It is an offence to wilfully or negligently: • Section 115: Dispose of waste in a manner that harms, or is likely to harm the environment. • Section 116: Cause any substance to leak, spill or otherwise escape (whether or not from a container) in a manner that harms, or is likely to harm the environment.	Section 5.0
	Part 5.6, Division 3: It is an offence: • Section 143: To transport waste to a place that cannot lawfully be used as a waste facility for that waste, or cause or permit waste to be so transported. • Section 144: For an owner or occupier of any place to use the place, or cause or permit the place to be used, as a waste facility without lawful authority. • Section 144AA: To supply information about waste to another person in the course of dealing with the waste, that is false or misleading, in a material respect.	Section 5.0
Protection of the Environment Operations (Waste) Regulation 2014 (Waste Regulations)	Requirements for the tracking of waste apply if the waste is of a type described in Schedule 1, Parts 1 or 2. Part 4, Section 43: Imposes obligations on the consignor of waste to: • Hold a consignment authorisation authorising the transportation of the waste from the place to the other place. • Obtain a waste transport certificate for the waste and accurately complete and certify required parts. • Give the waste transport certificate to the transporter of the waste.	Section 5.0 Section 6.1 & 6.6.

Legislation	Key Requirements	Where/how addressed
	• Ensure that the transporter holds an environment protection licence (if required by or under the Act) to transport the waste. • Ensure that the waste facility to which the waste is to be transported can lawfully accept waste of the type concerned.	
	Part 9, Section 92: Provides exemptions relating to resource recovery. Resource recovery exemptions allow some wastes to be beneficially and safely re-used independent of the usual NSW laws that control applying waste to land, using waste as a fuel, or using waste in connection with a process of thermal treatment. Resource recovery exemptions are only appropriate if the re-use: • Is genuine, rather than a means of waste disposal. • Is beneficial or fit-for-purpose, and • Will not cause harm to human health or the environment.	Section 5.0
	Part 11, section 112: A person who stores waste on premises (whether or not the waste was generated on the premises) must ensure that it is stored in an environmentally safe manner.	Section 5.0
Waste Avoidance and Resource Recovery Act 2001 (WARR Act)	Section 3: Establishes the waste management hierarchy.	Section 5.0

3.2 Waste Related Approval & EPL Conditions

This Waste MP considers and addresses the applicable conditions detailed in the SSI Approval (SSI-12590060), and the KKPS Environment Protection Licence (EPL21627) as listed in **Table 3.2** and Table 3.3 below.

The applicable administrative conditions of the SSI Approval (Conditions A1 to A24), are summarised in **Table 3.2**, as they remain applicable to this management plan. The full detail of these administrative conditions, and where these conditions are addressed is included in the KKPS OEMP.

Table 3.2: *Applicable waste related conditions in the SSI Approval*

Condition	Description	Where/how addressed
PART A: ADMINISTRATIVE CONDITIONS		
A1 to A24	• Obligation to minimise harm to the environment (A1) • Terms of Approval (A2 to A5) • Lapse of Approval (A6) • Limits on Approval (A7) • Limits on Operations (A8 to A12) • Statutory Requirements (A13 to A14) • Notification (A15) • Structural Adequacy (A16) • Demolition (A17) • Protection of Public Infrastructure (A18) • Operation of Plant and Equipment (A19) • Environmental Representative (A20 to A24)	KKPS OEMP
PART B: ENVIRONMENTAL CONDITIONS - GENERAL		
HAZARDS AND RISKS		
B17	**General** The Proponent must store and handle all chemicals, fuels and oils in accordance with: a) the requirements of all relevant Australian Standards; b) within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund; and c) the NSW EPA's ***Storing and Handling of Liquids: Environmental Protection – Participants Handbook*** if the chemicals are liquids. In the event of an inconsistency between the requirements in (a) to (c) above, the most stringent requirement shall prevail to the extent of the inconsistency.	Section 5.0

Condition	Description	Where/how addressed
WASTE		
B44	Any waste materials exposed or created in association with the construction works and proposed to be disposed of to an offsite location, must be classified in accordance with the EPA's ***Waste Classification Guidelines***.	Section 5.0
B45	Chemicals, fuels and oils used on-site must be kept in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's ***Storing and Handling of Liquids: Environment Protection- Participants Manual*** (Department of Environment and Climate Change, 2007).	Section 5.0
PART C: ENVIRONMENTAL MANAGEMENT AND REPORTING		
ENVIRONMENTAL MANAGEMENT		
C1	**Environmental Management Strategy** Prior to commencing construction, the Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: e. include: i. the following subplans: construction and ***operational waste management plan***, incorporating management of any contaminated materials disturbed during construction.	This Waste MP
C5	**Revision of Strategies, Plans and Programs** Within 3 months, unless the Secretary agrees otherwise, of: a) the submission of an incident report under condition C6 below; b) the submission of an audit report under conditions C15 to C19 below; and c) the approval of any modification to the conditions of this approval; or d) a direction of the Secretary under condition A2 of Schedule 2; the Proponent must review and, if necessary, revise the studies, strategies or plans required under the conditions of approval to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary. *Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.*	Section 7.0

Condition	Description	Where/how addressed
COMPLIANCE		
C6	**Incident Notification, Reporting and Response** The Secretary must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	Section 4.3.2 in the KKPS OEMP
C7	**Non-Compliance Notification** The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.	Section 6.5.3 Section 4.3.2a in the KKPS OEMP
C8	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Section 4.3.2a in the KKPS OEMP
C9	A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Section 6.5.3 Section 4.3.2a in the KKPS OEMP
C10	**Compliance Reporting** Compliance Reports of the development must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020) or its latest version.	Section 4.3.2b in the KKPS OEMP
C11	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020) or its latest version, unless otherwise agreed to by the Secretary.	Section 4.3.2b in the KKPS OEMP
C12	The Proponent must make each Compliance Report publicly available within 60 days of submitting it to the Secretary, unless otherwise agreed by the Secretary	Section 4.3.2b in the KKPS OEMP
C13	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020) or its latest version, the Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	Section 4.3.2b in the KKPS OEMP

Condition	Description	Where/how addressed
NOTIFICATIONS		
C14	**Notification of Department** Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Proponent must notify the Department via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	Section 4.3.3 in the KKPS OEMP
ACCESS TO INFORMATION		
C20	Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must: a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website: i) the EIS; ii) all current statutory approvals for the development; iii) all approved strategies, plans and programs required under the conditions of this approval; iv) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; v) regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this approval; vi) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs; vii) a summary of the current phase and progress of the development; viii) contact details to enquire about the development or to make a complaint; ix) a complaints register, updated monthly; x) the Annual Reviews of the development; xi) audit reports prepared as part of any Independent Environmental Audit of the development and the Proponent's response to the recommendations in any audit report;	Section 6.1 in the KKPS OEMP

Condition	Description	Where/how addressed
	xii) any other matter required by the Secretary; and b) keep such information up to date, to the satisfaction of the Secretary.	
UPDATING AND STAGING OF STUDIES, STRATEGIES AND PLANS		
C21	To ensure the studies, strategies and plans for the development are updated on a regular basis and incorporate any required measures to improve the environmental performance of the development, the Proponent may submit revised studies, strategies or plans required for the development under the conditions of approval at any time. With the agreement of the Secretary, the Proponent may also submit any study, strategy or plan required under the conditions of this approval on a staged basis.	Section 7.0
C22	The Secretary may approve a revised strategy or plan required under the conditions of approval, or the stage submission of these documents, at any time. With the approval of the Secretary, the Proponent may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable conditions in this approval. *Notes:* • *While any study, strategy or plan may be submitted on a progressive basis, the Proponent must ensure that the existing operations on site are covered by suitable studies, strategies or plans at all times.* • *If the submission of any study, strategy or plan is to be staged, then the relevant study, strategy or plan must clearly describe the specific stage to which the study, strategy or plan applies, the relationship of this stage to any future stages, and the trigger for updating the study, strategy or plan.*	Section 7.0

Table 3.3: *Applicable waste related conditions in EPL 21627*

Condition	Description	Where/how addressed
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity	Section 5.0
O5.1	The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the EPA's ***Waste Classification Guidelines*** as in force from time to time.	Section 5.0
O5.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	Section 5.0
O6.1	The licensee must store and handle all liquid chemicals and hazardous materials used at the premises within bunded areas that are constructed and maintained in accordance with the following: a) any relevant Australian Standards for the liquids being stored; and b) within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund; and c) the ***Storing and Handling Liquids: Environmental Protection Participant's Manual*** (DECC, 2007). Where any conflict exists between these requirements, the most stringent requirements apply.	Section 5.0

3.3 EIS Commitments

The following measures are commitments made as waste mitigation measures for the operational phase of KKPS made in the Environmental Impact Statement:

- An Operational Waste Management Plan (this Waste MP) will be developed and implemented prior to operational commencement. The Waste MP will be implemented with consideration of a hierarchical waste management approach, mitigation strategies (avoidance, mitigation, reuse, recycle or disposal), appropriate segregation of any waste materials and a plan to collect general solid waste and hazardous waste from the Proposal Site.
- Any waste that cannot be recovered or recycled will be sorted and taken to a licensed treatment or disposal facility where it will be treated and disposed of according to its classification.
- An audit regime will be implemented, in accordance with the Proponent's Health and Safety Environmental Management System during construction and operation which includes (but not limited to) quantities of waste, storage areas and contractor services.

3.4 Applicable Standards and Guidelines

The primary standards and guidelines applicable to this Waste MP include:

- NSW Waste and Resource Recovery Strategy 2014-21 (NSW EPA, 2014)
- NSW Government Resource Efficiency Policy (OEH, 2019)
- Waste Classification Guidelines (NSW EPA, 2014).

3.4.1 Waste Classification Guidelines

The NSW EPA's Waste Classification Guidelines provide a step-by-step process for the classification of waste, based on risks presented to the environment and human health. The classes of waste are defined in Schedule 1, Clause 49 of the POEO Act, and are summarised in **Table 3.4**.

Table 3.4: *Summary of defined waste classification groups*

Waste Classification	Description
Special Waste	Includes waste that has unique regulatory requirements such as asbestos or tyres and includes anything classified as special waste under an EPA gazettal notices
Liquid Waste	Waste (excluding special waste) that has an angle of repose of less than 5 degrees above horizontal, becomes free-flowing at or below 60°C or when it is transported, is generally not capable of being picked up by a spade or shovel or is classified as liquid waste under an EPA gazettal notice.
Hazardous Waste	Hazardous waste (other than special waste or liquid waste) includes waste that is a dangerous good that is classified under the Transport of Dangerous Goods Code as a 'Class 1' to 'Class 8' type of waste. It can also include coal tar or coal tar pitch waste, lead-acid or nickel-cadmium batteries, lead paint waste or any mixture containing one of these types of wastes.
General Solid Waste (Putresible)	General solid waste (putrescible) (other than special waste, liquid waste, hazardous waste or restricted solid waste) includes standard household and litter bins waste that is collected by or on behalf of local councils, food waste, animal waste, manure and night soil and grit or screening from sewage treatment systems.
General Solid Waste (Non-putresible)	General solid waste (non-putrescible) (other than special waste, liquid waste, hazardous waste, restricted solid waste or General solid waste (putrescible)) includes household recyclable waste that does not contain food waste, garden waste, wood waste, waste that was previously in dangerous containers that have been thoroughly cleaned out, virgin excavated material and building and demolition waste.

4.0 Operational Waste Streams

The following key operational activities and potential waste types are provided in **Table 4.1** below. Please note that the list is not exhaustive, and key activities/generated waste types may require amending

Table 4.1: *Key Operational Activities and generated waste types*

Operational Activity	Waste Type
Storage Compound and Workshop Operations	General solid waste Metal scrap Timber Paper and cardboard Comingled recycling Hard & soft plastics Hard plastics Aerosol cans Hazardous chemicals
General Office, Administration, Kitchen	General Solid Waste Food & other putrescible waste Paper & cardboard Comingled recycling Electronic wastes Municipal sewage
Site Amenities	Municipal sewage
Gas Turbine Compressor Wash Water	Trade wastewater
Gas Turbine evaporative cooler water blowdown	Trade wastewater
Demineralised water plant regeneration wastewater	Trade wastewater
Oily wastewaters from: • Diesel fuel storage/unloading area • Transformer bunds • Workshops	Trade wastewater
Wastewater from chemical bund drains	Trade wastewater
Site maintenance/overhauls	Various, however may include General solid waste Metal scrap Timber Soil/sediment
Facilities management	General solid waste (putrescible) General Solid Waste (non-putrescible) Comingled recycling Greenwaste Timber Hazardous chemicals Hard & soft plastics

5.0 Management and Mitigation Measures

Management and mitigation options for waste are identified across in the associated environmental documents, including legislation, the EIS and SSI Approval conditions. Specific measures to address waste generation and resource consumption at KKPS throughout the operational phase are outlined in this section and presented within the framework of the waste management hierarchy (**Figure 5.1** below)

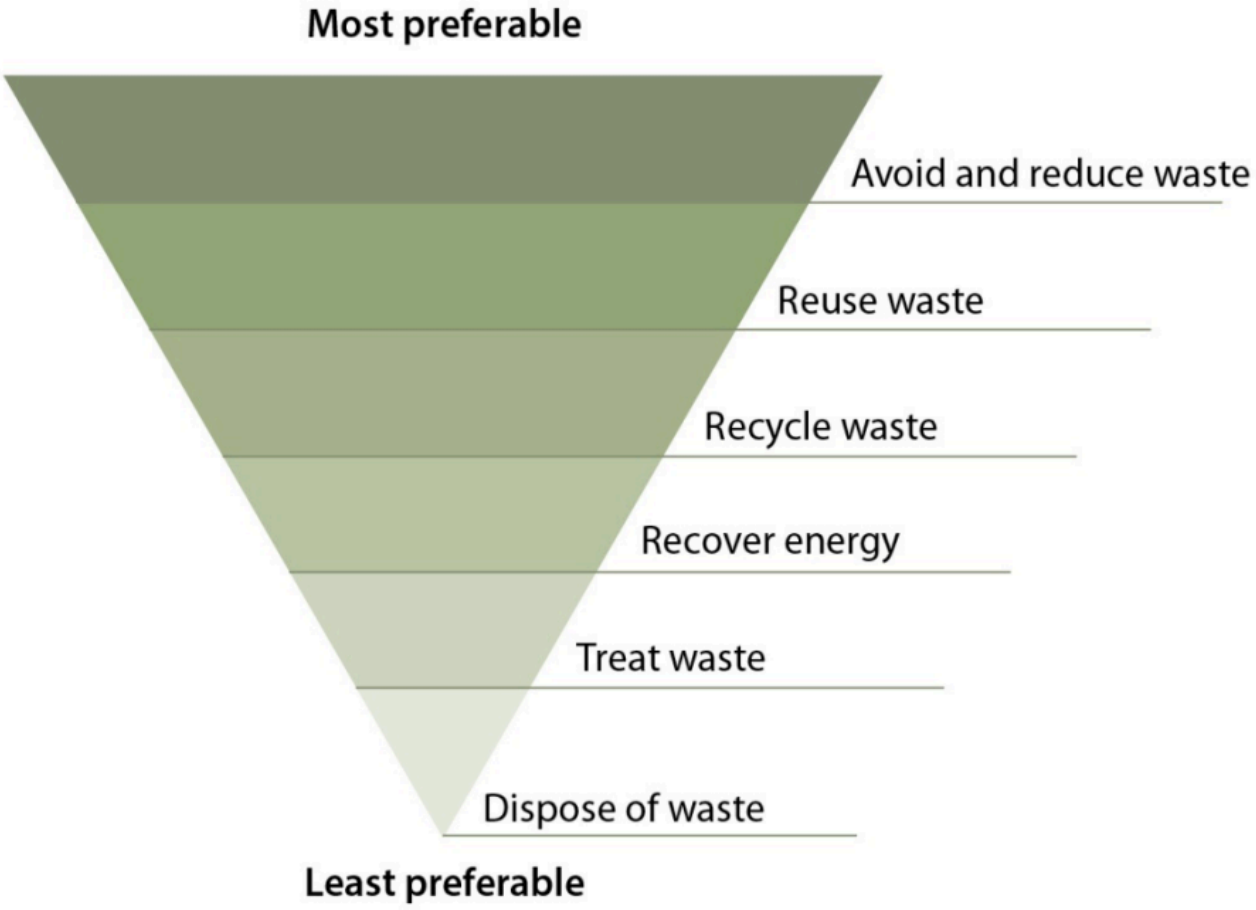

Figure 5.1: *The waste hierarchy (source: NSW Waste Avoidance and Resource Recovery Strategy 2014–21 (NSW EPA, 2014)*

5.1 General Management Measures

The following general waste management and mitigation measures

Overarching measures to be implemented to ensure the effective management and mitigation of waste related impacts at KKPS include:

- All waste chemicals, fuels and oils are handled and stored in accordance with all relevant Australian Standards.
- The handling and storage of any hazardous liquid wastes will be carried out in accordance with the NSW EPA's Storing and Handling Liquids: Environmental Protection – Participant's Manual (Department of Environment and Climate Change, 2007).

Where there are inconsistencies and/or updated versions of the relevant Australian Standards or EPA requirements, the more stringent shall prevail.

Further additional general mitigation measures include:

- Incorporating relevant waste management information in the Snowy Hydro Environmental Induction and KKPS Site Induction
- Maintaining high housekeeping standards to ensure KKPS generally and specific work/project areas are maintained in a neat and tidy manner
- Provision of bins across site that are appropriately sized and covered, as well as appropriately demarcated/labelled for the various waste streams expected at KKPS
- All waste bins are serviced by an appropriately licensed waste management contractor at regular intervals to prevent overfilling and accumulation of waste onsite
- Maintaining appropriate waste management records including
    - The types and volumes of waste collected, recycled and disposed
    - Sampling records utilised (i.e. sampling reports) to support the classification, and/or resource recovery exemption.
    - Relevant details of the waste transporter and waste receival facility for waste materials removed from KKPS

5.2 Prevention (Avoid and Reduce Waste)

The following measures will be utilised to minimise the ongoing generation of excess waste at KKPS. These measures are typically proactive in nature and are implemented during planning and procurement activities for ongoing site maintenance.

- Consideration of the types and quantities of packaging materials required prior to procurement of stock and supplies
- Favourable consideration of suppliers who proactively minimise packaging materials in a manner that does not compromise stock or supply quality
- Where applicable, proactive coordination and stocktake of onsite supplies, which promote the use of existing/unused materials
- Consideration of the re-use of excess spoil/materials to reduce the requirement for offsite disposal of excess, and procurement of virgin/new materials.
- Storage of stock and supplies in a secure and weather protected environment (where practical)
- Ensure bulk laydown/storage areas are maintained in an organised and tidy manner to prevent accidental damage and easy/identifiable access when required.

5.3 Re-use and Recycling

Where the options to avoid or reduce waste is not possible or practical, the measures listed below will be considered for implementation to promote onsite product re-use, or recovered through recycling and reprocessing into a non-waste material/product. To ensure re-use and recycling is effective, appropriate separation and segregation of waste streams is fundamental.

Mitigation measures to promote re-use and recycling include:

- Waste materials from maintenance tasks, projects, or other site activities will be separated into dedicated waste streams/storage areas to enable future re-use onsite, or collection by an appropriately licenced waste management contractor for transportation to suitable offsite facilities for recycling/reprocessing
- Implementation of appropriate colour coded and labelled waste bins in the site administration building that will include comingled recycling, paper & cardboard, landfill waste (general waste)
- Where practical, excavated spoil will be utilised for re-use onsite, potential re-use at other offsite locations, or disposal following appropriate assessment and classification in accordance with the NSW EPA's Waste Classification Guidelines.
- If site re-use is not possible for surplus or waste materials, options for beneficial re-use or recycling in accordance with relevant approvals will be considered in preference to disposal. Pathways for consideration include
    - Resource recovery orders and exemptions
    - Appropriately licenced recycling/re-processing facilities
    - Other approved developments/facilities that may accept the waste/surplus materials using a notice under Section 143(3A) of the POEO Act

5.4 Waste Disposal

Disposal of waste is the least preferred method to manage waste in the waste hierarchy, and will be considered only when measures further up the hierarchy have been considered as not feasible or practical, and disposal is necessary.

Mitigation measles to be implemented for disposal of waste include:

- All waste requiring offsite disposal will be classified in accordance with the NSW EPA's Waste Classification Guidelines, and disposed at facilities that are suitably licenced and able to accept such waste
- Where applicable waste tracking requirements will be complied with.
- Review of waste disposal records will be undertaken during relevant assurance activities
- The waste management Register will be maintained and kept up-to-date to ensure accurate records of waste types, volumes and disposal locations.

5.5 Waste Handling & Storage

Where waste materials are required to be handled and stored onsite prior to on/off-site reuse, recycling or disposal, the following measures will ensure effective segregation and mitigating potential impacts to the environment:

- All stored waste materials will be suitably labelled and identifiable, whilst being stored onsite.
- Excess spoil, Imported fill/aggregates, vegetation and/or much will be stored in allocated locations with appropriate controls implemented to prevent the generation of dust, impacts to drains/waterways, and to manage/contain sediment and erosion.
- Liquid wastes shall be contained in vessels suitable for that liquid waste, and stored within suitably bunded areas until it is removed from site.
- Hazardous waste will be stored in bunded storage areas in nominated areas.
- Bunded areas utilised for the storage of liquid waste must ensure they comply with Conditions O6.1 and O6.2 of EPL21627 (See below).
- All remaining recyclable/non-recyclable wastes shall be stored in suitably demarcated and covered receptacles in appropriate locations onsite.

EPL21627 Conditions O6.1 & 6.2 state:

O6.1 The licensee must store and handle all liquid chemicals and hazardous materials used at the premises within bunded areas that are constructed and maintained in accordance with the following:
a) any relevant Australian Standards for the liquids being stored; and
b) within a bunded area with a minimum bund capacity of 110% of the volume of the largest single stored vessel within the bund; and
c) the Storing and Handling Liquids: Environmental Protection Participant's Manual (DECC, 2007).

Where any conflict exists between these requirements, the most stringent requirements apply.

O6.2 For the purpose of condition O6.1 above, any tanks or other storage vessels that are interconnected and may distribute their contents either by gravity or automated pumps must be considered a single vessel.

5.6 Classification of Waste

The classification of waste streams at KKPS follows the defined six step process detailed in the NSW EPA's Waste Classification Guidelines Part 1: Classifying Waste (2014). A summary of this process is provided in **Figure 5.2**, with full details of the Waste Classification Guidelines accessible via the link below:

NSW EPA's *Waste Classification Guidelines Part 1: Classifying Waste* (2014)

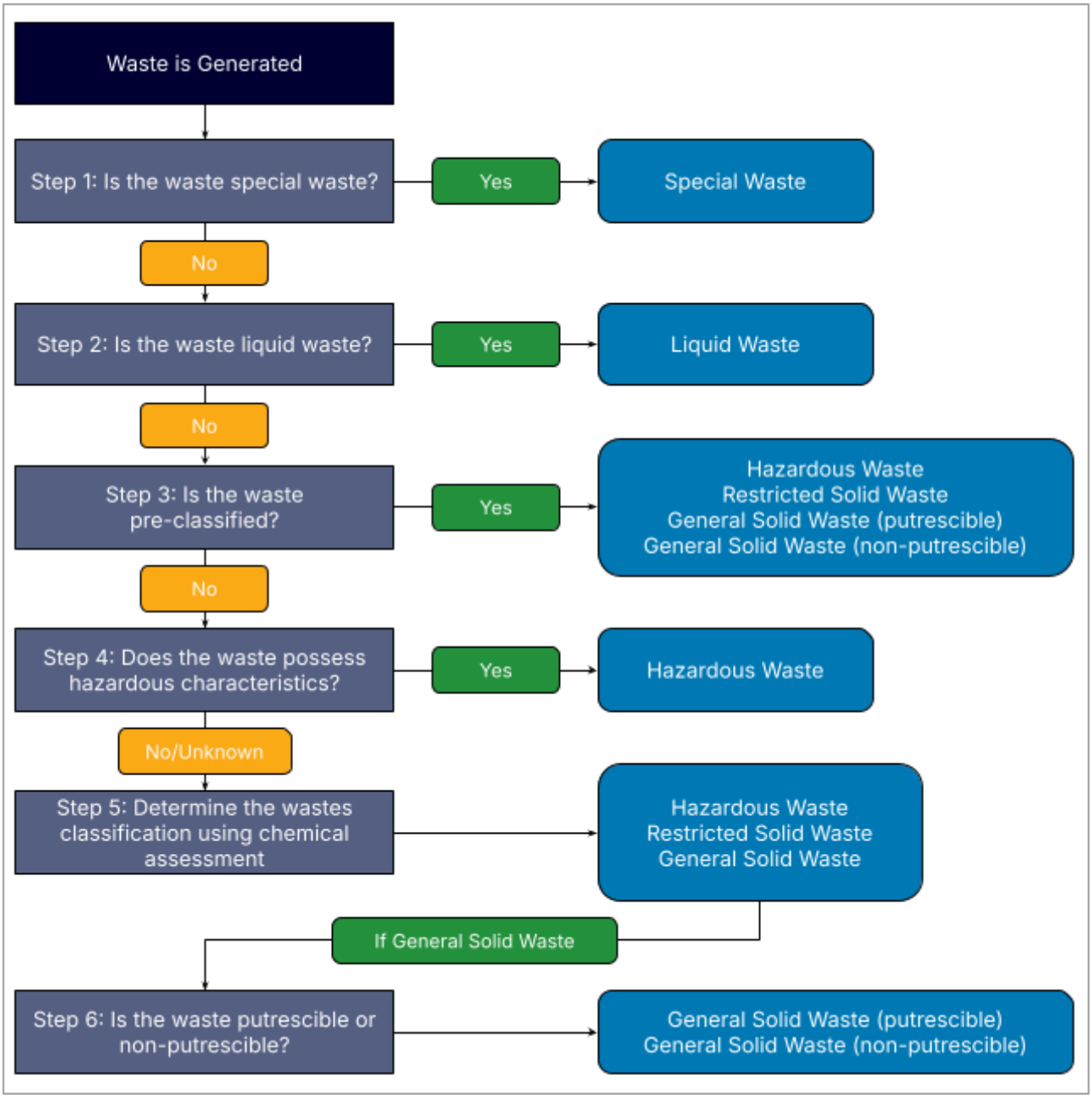

Figure 5.2: *Outline of the Waste Classification Guidelines six step process*

5.6.1 Classification of Key Waste Streams

Table 5.1 below outlines key waste types to be encountered at KKPS, their waste classification and identified management approach. Additional waste types not listed in **Table 5.1** may be encountered from time to time, and shall be classified ans per the NSW EPA's Waste Classification Guidelines, with a suitable management approach identified following the principles of the waste hierarchy.

Table 5.1: *KKPS waste types, classification and management approaches*

Waste Type	Waste Classification	Management Approach
Vegetation/Greenwaste	General Solid Waste (non-putrescible)	• Re-use or recycling to the extent possible via onsite mulching/chipping and reapplication to gardens/landscaped areas of site • Offsite disposal at a suitably licenced facility in accordance with the Mulch Exemption/Order 2016, processing or disposal at a facility licenced to accept such waste
Excess Spoil (VENM, ENM) - non-contaminated	General Solid Waste (non-putrescible)	• Prior planning to minimise expected spoil • Test and classify excess spoil • VENM classified material may be considered for onsite re-use where practical • ENM classified material may be considered for re-use via the Excavated material Exemption/Order 2014 • Excess spoil can be considered for disposal at a licenced facility if other options not available
Contaminated Spoil	Hazardous	• Prior planning to minimise expected spoil • Test and classify spoil • Consider onsite treatment options available for the contaminated spoil. • Contaminated spoil to be transported from site by a licenced waste transporter and disposed at a facility licenced to accept the waste. • Ensure all appropriate waste tracking documentation is completed
Construction & Demolition Waste - Inert materials	General Solid Waste (non-putrescible)	• Segregate various waste materials • Consider viability for site re-use where practical/feasible • Transported from site by a licenced waste transporter and for-re-use/processing at a facility licenced to accept the waste • If no other practical measures available, landfill disposal may be considered

Waste Type	Waste Classification	Management Approach
Hazardous Liquid Waste (including chemicals)	Liquid Waste	• Hazardous liquid wastes to be stored in appropriately label containers within a bunded area • Transported from site by a suitably licenced waste transporter and disposed at a facility licenced to accept the waste. • Ensure all appropriate waste tracking documentation is completed
Packaging Materials	General Solid Waste (non-putrescible)	• Segregate various waste materials • Transported from site by a licenced waste transporter and for-re-use/processing at a facility licenced to accept the waste • If no other practical measures available, landfill disposal may be considered
Office & Kitchen Waste	General Solid Waste (non-putrescible)	• Segregate various waste materials • Transported from site by a licenced waste transporter and for-re-use/processing at a facility licenced to accept the waste • If no other practical measures available, landfill disposal may be considered
Grey water & effluent	Liquid Waste	• To be managed as trade waste under an executed Trade Waste Deed with Hunter Water
Operational wastewaters • GT compressor wash water • GT evaporative cooler water • Demin water plant • Oily wastewater • Chemical bund drains	Liquid Waste	• To be managed as trade waste under an executed Trade Waste Deed with Hunter Water

6.0 Compliance Management

Specific aspects of the compliance tracking program used to provide oversight for compliance at KKPS is provided in the OEMP.

Environmental compliance at KKPS is demonstrated in Annual Compliance Reports submitted to DPHI and DECCWW addressing compliance reporting obligations in the SSI and EPBC Approvals, and the Annual Return to the NSW EPA.

Within Snowy Hydro, compliance is reported monthly to the operations executive committee and then to the Snowy Hydro Board. The reports to the operations executive include any identified non-compliances with the conditions of the SSI Approval, EPBC Approval, EPL21627, or any other applicable compliance obligation.

6.1 Monitoring and Reporting

Regular monitoring and inspections of the management and mitigation measures outlined in this Waste MP shall occur at a regular frequencies, and will include, however not be limited to:

- General site based inspections of waste management activities included as a routine task for KKPS Production Technicians to ensure;
    - Effective implementation of site based waste management measures
    - The site is maintained in a neat, tidy and litter free manner
    - Waste collection/storage locations are clearly identifiable and free from cross contamination

  As a minimum, site inspections are conducted on a daily basis, with numerous ad-hoc opportunities to observe site conditions by all site personnel.
- Targeted waste management inspections conducted by Snowy Hydro personnel, or an external party to ensure existing waste management measures remain effective and fit-for-purpose. Targeted inspections are conducted on at least a fortnightly frequency, with additional ad-hoc targeted inspections undertaken to identify improvement opportunities or for a specific waste management concern.
- Review of waste management records to ensure Waste Management Registers are being maintained, are accurate, and up to date with appropriate supporting records such as disposal receipts, waste contractor records, and/or tracking documentation
- Environmental auditing and assurance activities to assess ongoing compliance with the requirements of this Waste MP, and applicable Snowy Hydro policies and procedures
- Investigation of waste management related incidents, to identify causes, preventative actions and improvement opportunities, as well as tracking identified actions to ensure timely and effective implementation.

6.1.1 Waste Management Register

A Waste Management Register has been developed for KKPS to maintain accurate records of all waste materials collected and transported offsite by licensed waste management contractors. The register is kept up to date following receipt of records received by waste management contractors. The register contains all relevant records to ensure all waste removed from KKPS is managed in accordance with applicable legislation, licence and approval requirements, and includes:

- Dates of waste collection
- Waste Type
- Waste Classification
- Quantities Collected
- Management Method
- Receival Facility
- Waste Contractor
- Waste Tracking Number

6.2 Auditing

Auditing and assurance activities are undertaken to assess the effectiveness of environmental controls, and ongoing compliance with the KKPS OEMP and associated subplans, applicable SSI Approval conditions, EPBC Approval conditions and EPL21627.

Audits and assurance activities at KKPS include:

- Regular site based inspections
- Internal audits
- External audits, consisting of;
    - SSI Independent Compliance Audits
    - SSI Independent Site Hazard Audits
    - EPBC Independent Audit
    - Environmental Management System Audits

Auditing and assurance activities will be undertaken in accordance with the KKPS OEMP.

6.3 Training

Formal training is developed in accordance with Snowy Hydro's Training and Development Procedure, and is administered in the company's Learning Management System (LMS) which maintains training requirements for individuals and completion records of training attended.

Personnel working at KKPS receive training relevant to their role and the required skills to fulfil their role in a competent manner. Environmental training and awareness activities that are facilitated include:

- Snowy Hydro Environmental Induction
- KKPS Site Induction
- Environmental Compliance Training
- Specialised Environmental Training
- Targeted Environmental Awareness Packages
- Daily Pre-start Meetings

Further detail on environmental related training and awareness packages are described in the KKPS OEMP

6.4 Waste Management Responsibilities

During normal operating hours, KKPS is staffed by a Plant Manager, Planning Officer, and a team of Production Technicians. The Plant Manager holds overall responsibility for the management and safe operation of KKPS, including waste management.

Local support for KKPS is provided at all times, with the KKPS Production Technicians available on a rostered on-call basis.

Environmental, Safety, Production and Engineering support is provided by the relevant Snowy Hydro teams based locally or Cooma as required.

Detail on the roles and responsibilities for environmental management, including waste management, is provided in the KKPS OEMP.

6.5 Reporting and Notification Requirements

6.5.1 Environmental Incidents - Internal Reporting

Environmental incidents at KKPS are managed in accordance with Snowy Hydro's Incident Management Procedure, and classified in accordance with the Safety and Environment Incident Classification Matrix. Incident management procedures are accessible on the Snowy Hydro Intranet, which provide guidance on internal notification and investigation requirements.

Any environmental incident or near hit, including non-compliances and community complaints, should be reported in the event management system and communicated with the Environment Team.

6.5.2 Environmental Incidents - External Reporting

The response to a pollution incident causing or threatening material harm to the environment is detailed in the KKPS Emergency Response Handbook (ERH). The ERH serves as the KKPS Pollution Incident Response Management Plan (PIRMP), which is a document required by all holders of an Environment Protection Licence (EPL) under Part 5.7A of the POEO Act. A publicly available version of the PIRMP (internet based version) is also available on the Snowy Hydro website.

For full details on the external reporting requirements for environmental incidents, please refer to the KKPS OEMP.

6.5.3 Non-compliance Notification - SSI Approval

As per Condition C7 of the SSI Approval, Snowy Hydro must notify the DPHI Secretary via the Major Projects Portal of any non-compliance with the conditions of the SSI Approval, within seven days after becoming aware of the non-compliance. The details required for this notification are provided in condition C8 of the SSI Approval.

Note that this excludes any non-compliances that have already been notified via the Major Projects Portal as an incident.

Further details on non-compliance notification requirements are provided in the KKPS OEMP.

6.5.4 Non-compliance Notification - EPBC Approval

As per Condition 8 of the EPBC Approval, Snowy Hydro must notify the Federal Department responsible for administering the EPBC Act (presently the Department of Climate Change, Energy, the Environment and Water) in writing of any incident, as defined by the terms of the approval, non-compliance with the conditions of the EPBC Approval or non-compliance with commitments made in any plans required under the EPBC Approval as soon as practicable, but no later than two business days after becoming aware of the non-compliance. The details required for this notification and follow up requirements are provided in conditions 8 and 9 of the EPBC Approval.

Further details on non-compliance notification requirements are provided in the KKPS OEMP.

6.5.5 Statutory Environmental Reporting and Notifications

At KKPS, there are numerous statutory environmental reporting and notification requirements. Further detail on the statutory Environmental reporting and notification requirements can be found in the KKPS OEMP.

Full details of these requirements are provided in the KKPS OEMP.

6.6 Record Keeping

Records must be kept for all monitoring, investigation, communication, agreements, incidents, reports and any other matter that has the potential to be referred to in the future. Documentation and records relating to site operations shall be retained in accordance with Snowy Hydro's Information Asset Management Procedure.

EPL21627 specifies documentation and records relating to environmental management, monitoring, and reporting must be retained for a minimum of four years. These documents and records must be available onsite in hard copy or electronically within the Snowy Hydro Document Management System.

6.7 Community Enquiries, Complaints and Feedback

Snowy Hydro maintains several avenues for members of the community to make contact in relation to any aspect of KKPS. In addition to a dedicated telephone complaints line required by condition M7 of EPL21627, Snowy Hydro can also be contacted by email and via post.

Contact details for community complaints, enquiries and other feedback relevant to KKPS are:

Telephone: 1800 766 333 (freecall)

Email: info@snowyhydro.com.au

Post: PO Box 332
Cooma NSW 2630

These contact details are advertised to the public on the Snowy Hydro website, in the White Pages telephone directory. The telephone number is also provided in the KKPS PIRMP.

The provision of the above contact details also satisfies the requirements of Condition C20(a)(viii) of the SSI Approval.

Full details can be found in the KKPS OEMP.

7.0 Document Review

The KKPS OEMP and associated subplans, including this Waste MP, are not static documents, and are regularly reviewed and updated as required to reflect changes in environmental management requirements and/or statutory obligations. Updates to this Waste MP may be made in response to:

- scheduled reviews of the OEMP, and/or associated subplans
- regulatory changes
- internal or external audit recommendations
- issues identified in Annual Compliance Reports or EPL Annual Returns
- staff and organisational changes
- incidents and investigation outcomes; and
- new initiatives in environmental management.

The SSI Approval specifies (Condition C5) that within three months of the following listed triggers, Snowy Hydro shall review and, if necessary, revise the OEMP, and relevant studies, strategies or plans required under the SSI Approval. If the review of the relevant document(s) leads to an updated revision, the document(s) will be submitted to DPHI Secretary for approval via the Major Projects Portal within 4 weeks of the document review.

The specified triggers listed under Condition C5 of the SSI approval to review applicable document(s) are:

- DPHI notification of an incident that has caused or threatened material harm (condition C6)
- The submission of an Independent Environmental Audit (conditions C15-C19)
- DPHI granting approval to a modification of any condition in the SSI Approval, or
- A direction from the DPHI Secretary

Notwithstanding the above triggers, Conditions C21 and C22 of the SSI Approval allows for Snowy Hydro to submit revised studies, strategies or plans required for KKPS under a condition of the SSI Approval at any time, and for the DPHI Secretary to approve these at any time.

With the agreement of the DPHI Secretary, the Proponent may also submit any study, strategy or plan required under the conditions of this approval on a staged basis. With the approval of the DPHI Secretary, the Proponent may prepare the revised or staged strategy or plan without undertaking consultation with all parties nominated under the applicable conditions in this approval.