

Environmental Management Plan (EMP): 5 Kiora Crescent, Yennora

A Submission to Kiora One Pty Ltd

28th March 2025



Prepared by

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Environmental Management Plan	
Project Name	5 Kiora Cres
Proponent/approval holder and ABN/CAN	Kiora One Pty Ltd ABN 85 614 291 182
Proposed Action	Liquid waste treatment plant, product destruction plant and hazardous materials storage and transfer facility
Location of the action	5 Kiora Crescent, Yennora
Date of preparation of EMP	28 March 2025

Review

Revision number	Person accepting responsibility for EMP	Position	Signature	Date
01	Insert Name	Insert Position	Sign	Date

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Glossary

Terminology	Definition
ADG	Australian Dangerous Goods Code
EC	Environmental Complaint
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EPA	Environment Protection Authority (NSW)
EPL	Environment Protection Licence
LGA	Local Government Area
NCR	Non-Conformance Report
NOHSC	National Occupational Health and Safety Commission
PASS	Potential Acid Sulphate Soils
PPE	Personal protective equipment
PIRMP	Pollution Incident Response Management Plan
PoEO	Protection of the Environment Operations 1997 (NSW)
SDS	Safety Data Sheet
WHS	Work Health and Safety

1 Background

1.1 Introduction

This Environmental Management Plan (EMP) has been prepared by MRA Consulting Group (MRA) on behalf of Kiora One Pty Ltd (hereafter referred to as 'Kiora One'). The EMP details how the environmental management requirements for the liquid waste treatment plant, depackaging/product destruction plant and clinical waste storage/transfer facility at 5 Kiora Crescent, Yennora (the 'site'), will be implemented and managed on site by Kiora One.

The aim of the EMP is to ensure compliance with environmental legislation and that environmental risks associated with the project are properly managed. This report is a live document, which should be reviewed and revised following approvals, licensing, commissioning and any significant events or modifications on site.

1.2 Description

Kiora One will utilise buildings as facilities for liquid waste processing, depackaging/product destruction, and transfer of clinical waste and dangerous goods. The facility would accept and/or process up to 220,000 tonnes of material per year across all of the proposed uses. Materials would be managed through distinct processes outlined as follows (see Table 1):

Table 1: High level development overview

Input	Process	Location
180,000 tpa of liquid waste including: <ul style="list-style-type: none"> waste cooking oil, sewage sludge and residues, and industrial waste residues. 	Liquid waste decontamination and discharge by: <ul style="list-style-type: none"> Unloading and loading of liquid waste from tanker trucks; Filtration of solid debris; Separation of solids; Separation of oils and sludge; and Separation of oil and water. 	Building 1
20,000 tpa hazardous materials,	Consolidation and transfer of materials.	Building 2
20,000 tpa rejected commercial waste.	Product destruction (shredding) and liquid waste processing.	Building 3

Activities on the Site are scheduled activities according to the *Protection of Environmental Operations Act 1997* (PoEO) and therefore, site activities will be subject to an Environment Protection Licence (EPL). This EMP will be updated with specific licence requirements following development approval.

1.2.1 Site Location

The site is identified as Lot 10 in DP1233715 at 5 Kiora Crescent, Yennora and covers an area approximately 7,221m².

The site is located in an industrial precinct in Yennora, within the Cumberland Council Local Government Area (LGA). The Cumberland LGA is bordered by the City of Parramatta Council, the City of Blacktown Council, Strathfield Council, Canterbury-Bankstown Council, and the City of Fairfield Council in Sydney's central west (see Figure 1).

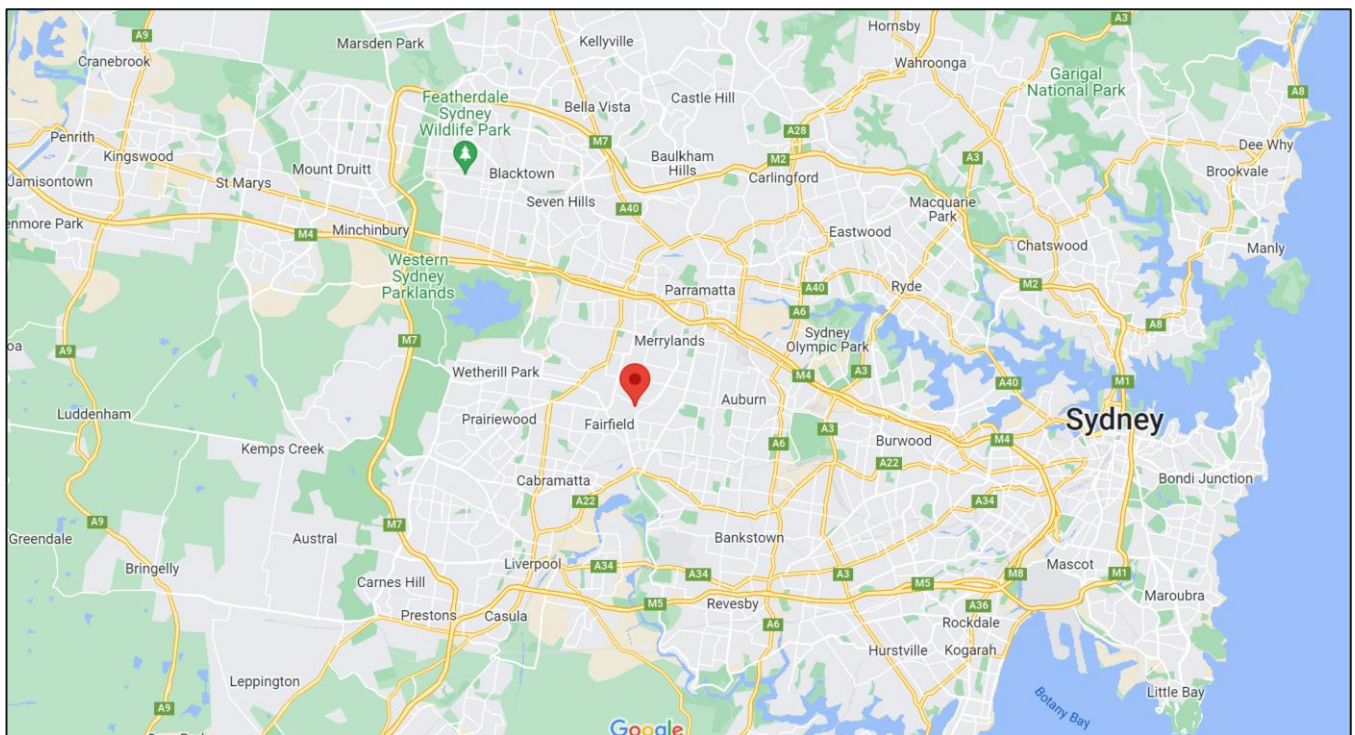
The surrounding area is predominantly defined by industrial development, large scale buildings and major rail infrastructure.

The entrance to the site is located at the western end of Kiara Crescent on a cul de sac, with the rear and side boundaries adjoining other industrial properties. The site maintains a separate exit also on Kiara Crescent, at the south-eastern corner of the site.

The site has undergone major development works according to DA2019/457/1. The site has been completely cleared apart from boundary vegetation and has concrete hardstand on all external areas. The site maintains space for a single weighbridge for weighing and recording incoming and outgoing trucks are situated inside the site at the main vehicle access points shown in Figure 2.

There are three industrial buildings at the site which are proposed to be utilised for the purposes described. Uses of site buildings were not identified in DA2019/457/1 and as such, are addressed in the State Significant Development (SSD) Application SSD-72229458. Site offices will also be utilised by Kiara One personnel (Figure 3), however are currently unstaffed.

Figure 1: Site Location



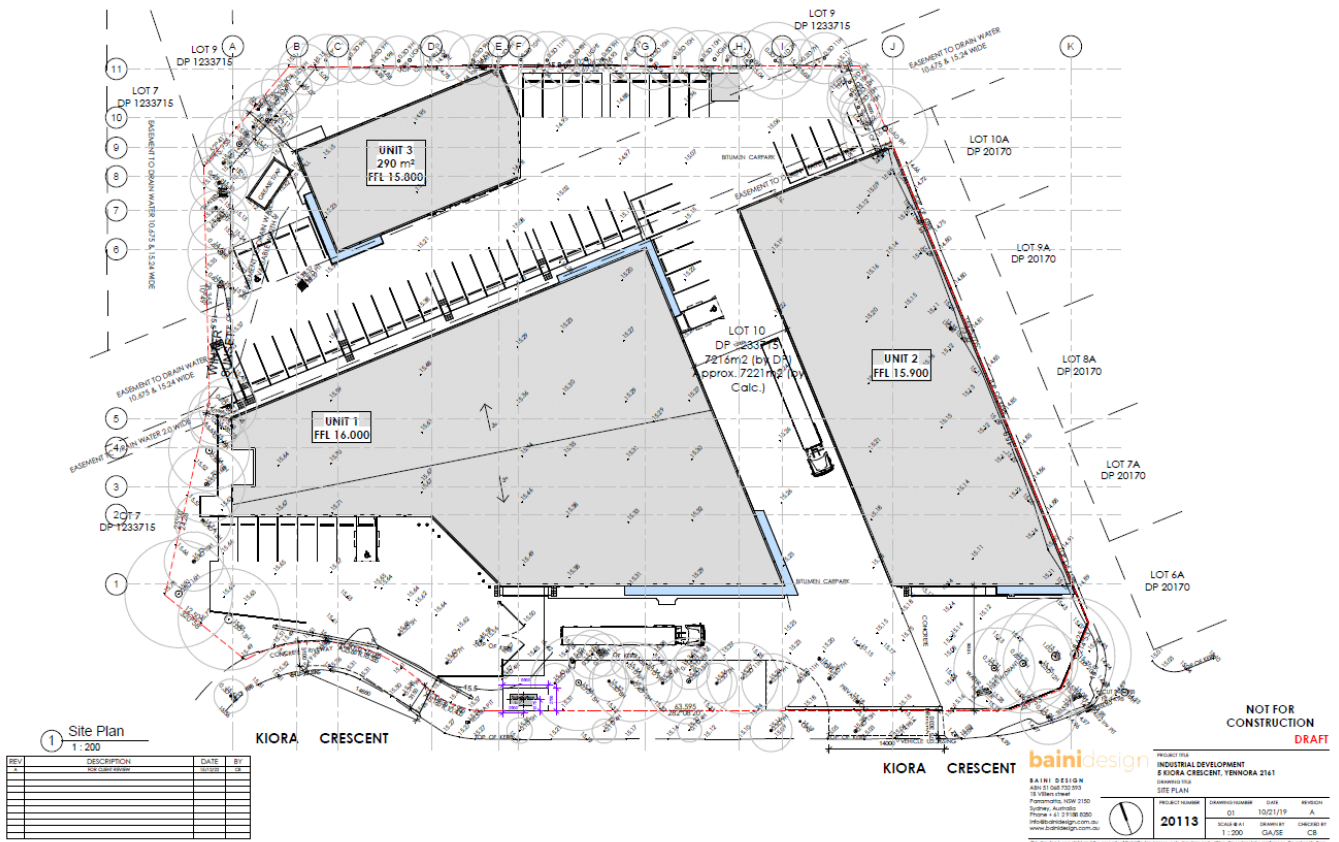
Source: Google Maps, 2023.

Figure 2: Aerial Imagery of the site and its surrounds



Source: Nearmap, 2023.

Figure 3: Site Infrastructure



Source: Baini Design, 2023.

1.2.2 Hours of Operation

The hours of operation for receipt, processing, and offtake would be as follows:

- Material delivery – 24/7;
- Offtake times – 24/7;
- Operation of machinery times – 24/7;
- Anticipated to have two site operation shifts – 4am-4pm and 4pm to 4am including maintenance; and
- Administration and management – between 8-6pm, Monday to Friday.

1.2.3 Staff

The proposed development would generate 33 FTE positions during operation. This includes 30 FTE staff working on the processing operations (in 2 x 10 or 12 hour shifts) and 3 FTE office staff. Shifts may be staggered once operational to limit crossover of staff change-over and office staff would typically be limited to day operations. Therefore, the maximum number of staff onsite at any time is expected to be approximately 33 personnel across all uses and shifts in a given day.

1.3 Environmental Management Plan Context

This EMP summarises the objectives, responsibilities, and operational management measures to be undertaken by Kiora One to ensure the ongoing sustainable and safe use of the site for the uses intended.

The EMP has been prepared as part of the site's environmental management system in conjunction with:

- An Environmental Impact Statement (EIS)
- A Pollution Incident Response Management Plan (PIRMP)
- Work Health and Safety Plan (WH&SP)
- An Environment Protection License (EPL)

1.4 Environmental Management Plan Objective

The EMP is a site or project specific plan developed to ensure that appropriate environmental management practices are followed during a project.

The objectives of this EMP are:

- to comply with applicable environmental legislation;
- minimise damage to the environment caused by the project;
- to comply with Kiora One's environmental guidelines and requirements;
- to ensure all environmental safeguards are implemented correctly;
- provide details of complaints procedures;
- provide reporting, review, and training guidelines for the site; and
- to monitor the project's environmental impact.

1.5 Environmental Policy

Kiora One's Environmental Policy is provided overleaf.

ENVIRONMENTAL POLICY

1. Aim & Commitment:

- i. **Kiora One** aims to ensure the operational and administrative aspects of its business do not cause undue harm to the environment. This will be achieved by taking all reasonable and practicable measures to prevent or minimise harm to the environment. We will strive to achieve a high standard of environmental care and responsibility. We commit to preventing pollution, to operating the Business Management System in compliance with AS/NZS/ISO 14001 and all other statutory and regulatory requirements. We are also committed to enhance environmental performance through continually improving the Integrated Management System.

2. Application:

- ii. This policy applies to employees, agents, contractors (including temporary contractors) and 'workers' as otherwise defined under relevant WHS legislation of **KIORA ONE** collectively referred to in this Policy as workplace participants.

3. Objectives:

3.1 KIORA ONE is committed to:

- providing the necessary training to minimise adverse environmental impacts and issues;
- ensuring that **KIORA ONE** and all workplace participants comply with applicable environmental legislation and regulations;
- considering environmental matters in all business planning and risk management;
- implementing procedures and checklists to verify and review **KIORA ONE** environmental performance; and
- reducing, re-using and recycling waste products wherever practicable.

4. Duties:

- 4.1 **KIORA ONE** has a direct responsibility to ensure that environmental harm is not generated by any of its operations. **KIORA ONE**:
 - must not to carry out an activity that may cause harm without taking measures to prevent or minimise the harm;
 - must report incidents to the appropriate regulatory authority that result in or threaten serious or material environmental harm; and
 - must take action to prevent or minimise harm to the environment if an incident occurs.
- 4.2 If a workplace participant suspects their actions in the workplace are causing or may cause environmental harm or the workplace participant has identified an area of improvement, the matter should be reported to the CEO.

5. Non-Compliance:

- 5.1 If a workplace participant fails to comply with the requirements set out in this policy, it will be regarded as a serious breach of conduct and may result in the termination of employment/services/contract. When a breach occurs, an investigation will be conducted to determine the appropriate action to be taken.

Simon Saba, General Manager

February 2022.

2 Environmental Management

2.1 Environmental Management Structure and Responsibility

The principal responsibilities of Kiora One 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 2 below.

Site Manager

The Site Manager is responsible for promoting and maintaining good environmental management. The Site Manager is to ensure that this EMP is effectively implemented. The Site Manager is required to support the Site Supervisor and hold them accountable for their specific responsibilities. The Site Manager is responsible for taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions.

Site Supervisor

The Site Supervisor is responsible for inducting all workers and subcontractors and directing site activities in accordance with this EMP.

The Site Supervisor is responsible for taking all practical measures to ensure the site is operating according to this EMP, and without risks to the environment. The Site Supervisor is responsible for detecting any non-compliance or environmentally risky conditions. 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 to the Site Manager.

Workers

All workers are required to attend site inductions and follow this EMP. Workers are responsible for advising the Site Supervisor of any potential environmental issues.

Subcontractors

All subcontractors engaged to perform work for Kiora One 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.

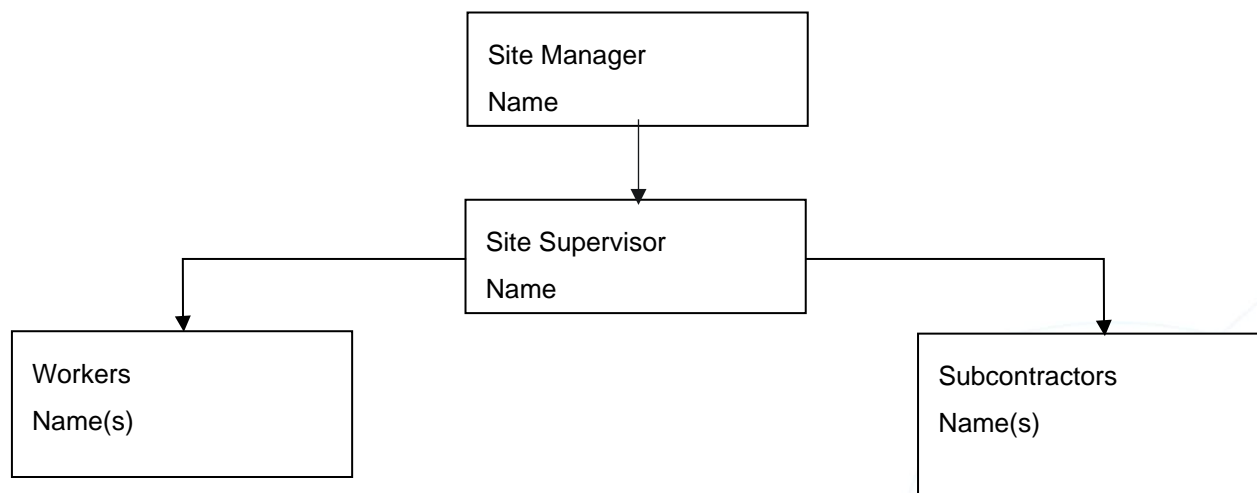


Table 2: Project Environmental Roles & Responsibilities Matrix

TASK	Site Manager	Site Supervisor	Workers	Subcontractors
Inducting workers and subcontractors and directing site activities in accordance with the EMP.	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
Promoting and maintaining good environmental management in accordance with the relevant environmental legislation, regulations and laws.	1	1	2	2
Implementing practical measures to ensure the site complies with the EMP and project specifications.	2	1	2	2
Maintaining, providing updates and supplying this EMP to relevant authorities and workers.	1	2	2	2
Monitoring and assessing subcontractors for the project to ensure environmental regulations are met and relate to the works undertaken.	1	2	2	2
Maintaining stocks for environmental control.	1	1	2	1
Provide and maintain a hazardous substances register for hazardous substances used and stored in the workplace.	1	1	2	2

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 on the project.

2.2 Approval and Licensing Requirements

Approvals and licensing requirements are summarised below.

Kiora One will ensure that any licences, permits and approvals are updated to reflect the operational requirements of the facility. A copy of the relevant licences, permits and approvals are included in **Appendix A** of this EMP.

2.2.1 Development Consent

Development consent no. DA2019/457/1 was issued by Cumberland Council on 31 May 2020 for the “construction of three (3) industrial units and a weighbridge including site works and landscaping”. The consent was subsequently modified by MOD2022/0194, determined on 29 June 2022, to delete condition 129, which relates to limitation of the site for a waste facility.

A copy of the Consent and Modification are included in **Appendix A** of this EMP.

Further information is addressed in SSD-72229458.

2.2.2 Environmental Protection License (EPL)

An Environmental Protection License (EPL) will be required in accordance with Schedule 1 of the PoEO Act 1997 as part of the approvals process to permit the following scheduled activities at the site:

- Resource Recovery
- Waste processing (non-thermal treatment)
- Waste storage

An EPL will be sought in parallel to development consent. A copy of the EPL will be included as part of the revision to this EMP once available.

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 for this project will include, but not be limited to, the following:

- monitoring records;
- 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 operational site file.

2.4 Environmental Training

All Kiora One workers who will be working on this site shall receive site-specific induction training. The induction training will include:

- familiarisation with the requirements of this EMP;
- environmental emergency response training; and
- familiarisation with site environmental controls.

A record of the site induction will be made on the Site Environmental Induction Register (see **Appendix B**).

2.5 Emergency Contacts and Responses

This EMP sets out Kiora One management of environmental emergencies during the project. It includes:

- the names of key emergency response personnel and contact details (including all-hours telephone numbers);
- 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;
- steps to follow to minimise damage and control the emergency; and
- instructions and contact details for notifying the Site Supervisor, EPA, local council, nearby residents or the community if necessary.

2.5.1 Key Emergency Response Personnel

The Site Manager [Insert Name] 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 Table 3 below.

Table 3: Emergency Response Contact Details

Site Contact Details	
Emergency Services	
Ambulance, Fire or Police	000
Poisons Information	13 11 26
First Aiders	
Contact Name TBC	Contact Number TBC
Contact Name TBC	Contact Number TBC
Utilities	
Water Pollution	132 090
Electrical Emergency	13 13 88
Gas	131 909
Telephone	132 203
Dial Before You Dig	1100
EPA (24 hour pollution line)	131 555
Site Manager	
Contact Name TBC	Contact Number TBC
Site Supervisor	
Contact Name TBC	Contact Number TBC
Health and Safety Representative (HSR)	
Contact Name TBC	Contact Number TBC

2.5.2 Hazardous Substances

Kiora One will maintain an up-to-date register of Hazardous Substances and Safety Data Sheets (MSDS) for all materials used on the site (see **Appendix B**).

Controlled, updated copies of these SDS will be readily available to the Site Manager and Site Supervisor and prominently displayed at the worksite.

2.5.3 Emergency Response Procedures

2.5.3.1 Fire Emergency

Steps to manage a fire emergency:

- Call '000' as soon as possible. If '000' does not work on your mobile phone call '**112**';
- 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.

2.5.3.2 Gas Leak Emergency

Steps to manage a gas leakage emergency:

- Call the Site Supervisor immediately, if deemed necessary call the Fire Brigade on '000'. If '000' does not work on your mobile phone call '112';
- 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.

2.5.3.3 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).

2.5.3.4 Emergency Evacuation Plan

An Emergency Preparedness and Response Procedure has been prepared for the site, which include information relating to Emergency Assembly Points. Relevant Emergency Evacuation Plans will be displayed in prominent locations prior to occupation of the building.

2.5.4 Pollution Incident Response Management Plan

Under the NSW Protection of the Environment Operations Act (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, holders of an Environment Protection Licence must prepare and implement a Pollution Incident Response Management Plan (PIRMP).

A PIRMP has been prepared by Kiora One for the site and is regularly reviewed and tested. A copy of the current most up to date PIRMP is provided in **Appendix C** of this EMP. Copies of the PIRMP are to be available on-site.

2.5.5 Fire Prevention and Incident Management

A competent Fire Safety Practitioner has drawn up a Fire Protection Service plan identifying all fire response services. Information relating to fire prevention and incident management will be provided as part of staff training and inductions. Fire prevention mitigation measures as discussed in Section 3.2.10 to be understood and implemented.

2.5.6 Emergency Response Management Plan

In accordance with NSW Government's *Hazardous Industry Planning Advisory Paper No 1, Emergency Planning* (DoP, January 2011), an Emergency (Response) Management Plan (ERMP) should be developed to support a facility during operational stage that is comprehensive, relevant, realistic and sufficiently clear to be understood by all users as well as being flexible and continually monitored and reviewed.

For the planning stage, the principles relating to Emergency Response will provide the primary actions in the event of an emergency on site.

Following construction and commissioning, a more detailed ERMP may be necessary, informed by hazards identified in this EMP, other knowledge developed during commissioning and it may also draw on knowledge from stakeholders including emergency response agencies, Local Government and the Local Emergency Management Committee.

3 Implementation

3.1 Risk Assessment

The risk to the environment of carrying out the project has been considered and documented.

The qualitative risk assessment identifies key environmental aspects using the risk rating presented in Table 4 below. The assessment calculates a risk ranking based on the likelihood of occurrence of an event and the expected consequence in the case of the event occurring.

Table 4: Risk Analysis Categories and Criteria for Risk Rating

Likelihood		Consequence				
		Not significant 1	Minor 2	Moderate 3	Major 4	Severe 5
Rare	A	L	L	M	H	H
Unlikely	B	L	L	M	H	V
Possible	C	L	M	H	V	V
Likely	D	M	H	H	V	V
Almost certain	E	H	H	V	V	V

(Risk Rating = Likelihood x Consequences)

LEGEND:

L	Low Risk	Responsible Managers need to develop or modify policy or procedure to address the risk. A simple action plan can also be developed.
M	Moderate Risk	Action timeframe determined and Risk Action Plan developed by responsible manager with relevant Director informed of progress.
H	High Risk	Action timeframe to be determined in conjunction with the Emergency Management Team (EMT) and Risk Action Plan to be developed by the responsible manager.
V	Very High Risk	Immediate action to be initiated in conjunction with EMT and Risk Action Plans to be developed by responsible manager and implemented immediately.

The criteria for evaluating likelihood and consequence of risks are identified in Table 5 and Table 6.

Table 5: Criteria for Evaluating Likelihood

Level	Descriptor	Example of Description	Example Frequency of Occurrence
A	Rare	Only ever occurs under exceptional circumstances	Once in more than 20 years

Level	Descriptor	Example of Description	Example Frequency of Occurrence
B	Unlikely	Conceivable but not likely to occur under normal operations; no evidence of previous incidents	Between once in 5 years and once in 20 years
C	Possible	Not generally expected to occur but may under specific circumstances	Between once a year and once in 5 years
D	Likely	Will probably occur at some stage based on previous incidents	Between once a month and once a year
E	Almost certain	Event expected to occur most times during normal operations	Once per month

Table 6: Criteria for Evaluating Consequence

Level	Descriptor	Safety	Financial	Operational	Environmental
1	Not significant	No medical control required	Low financial cost	< 6 hours facility closure or disruption of operations	No environmental harm
2	Minor	First aid only	Medium financial loss	> 6 hours but < 24 hours facility closure or disruption of operations	Release to environment immediately contained
3	Moderate	Medical treatment, lost time to injury or temporary reversible illness	Moderate financial loss	> 24 hours but < 48 hours facility closure or disruption of operations	Release to environment contained with internal assistance
4	Major	Extensive injuries – permanent partial disability or severe lost time to injury	Major financial loss	> 2 days but < 5 days facility closure or disruption of operations	Release to environment contained with external assistance
5	Severe	Death or irreversible disability	Huge financial loss (> \$5m)	> 5 days facility closure or disruption of operations	Pollution event with detrimental effect

The outcomes of the qualitative risk assessment are presented in Table 7. The initial risk rating is calculated as if no mitigation measures would be implemented. The proposed mitigation is then discussed in Section 3.2.

Table 7: Qualitative Environmental Risk Assessment

Issue	Potential Impacts	Comment	Preliminary Risk Ranking
Soil and Water	Leachate entering stormwater drains	No processing or stockpiling of materials would occur outside of the facilities on site and	Low

Issue	Potential Impacts	Comment	Preliminary Risk Ranking
		therefore there would be no generation of leachate from stormwater. Liquid inputs would be stored in tanks or sealed in IBCs.	
	Disturbance of acid sulfate soils (ASS) or potential acid sulfate soils (PASS) causing environmental harm	No ASS or PASS has been detected at the site according to the NSW eSpade tool.	Low
Flooding	Flood waters entering site	The site is located on flood prone land. If flood waters enter the site, it could lead to accidental discharge of leachate generated from contact with materials. The facility has been designed (under an earlier development permit) to be above flood planning levels to minimise the risk of flood waters entering site.	Low
Traffic, Parking and Access	Increased traffic volumes and frequency	Increased vehicle movements have the potential to place pressure on intersection and road capacities within the vicinity of the site.	Moderate
	Reduction in road safety as a result of increased number of vehicles operating on the road networks around the site	The new facility would result in an increase in trucks accessing the site from Kiora Crescent.	Moderate
Waste Management	Disruption to operations	Unplanned disruption to processing, resulting in large quantities of unprocessed materials being stored onsite.	Low
	Receipt of non-conforming waste at the site	Waste that is not permissible being brought on site. Contaminated loads being brought on site.	Low
	Pollution of environment	Inappropriate waste management resulting in pollution of the environment, contamination of outputs or mixing of incompatibles substances.	High
Noise and Vibration	Noise impacts resulting from site operations	Operational noise and vibration in relation to traffic movements, loading and unloading and processing of materials at the facility.	Low
	Noise impacts from installation works	Noise and vibration caused by works and installation of plant and equipment for new facility.	Low

Issue	Potential Impacts	Comment	Preliminary Risk Ranking
Air Quality	Air pollution (dust and exhaust emissions) from construction and installation activities on site	Construction required by the proposal would only be limited to installation of internal equipment within the buildings on the Proposal site.	Low
	Odour impacts on sensitive receivers from site operations	Potential for odour impacts due to nature of the waste streams received onsite.	Moderate
	Dust emissions from trucks entering and exiting site	Generation of dust brought onto the site from trucks is not likely due to the nature of operations.	Low
	Dust emissions from processing of material	Unlikely due to non-friable characteristics of both incoming and outgoing material.	Low
	Dust emissions from stockpiles of material	Unlikely due to non-friable characteristics of waste materials and methods of storage used on site.	Low
	Air pollution (exhaust emissions) from vehicles, plant and equipment from site operation	Moderate volumes of trucks entering and exiting site on a daily basis.	Low
Biodiversity	Disturbance or damage to flora and fauna as a result of construction activities on site.	The site is located in a developed, industrially zoned area which has experienced extensive disturbance from its original state. No vegetation will be removed under this proposal.	Low
	Disturbance or damage to flora and fauna as a result of ongoing operation of site.	The site has been cleared of native vegetation for many years and is largely developed. It is not expected that any construction or operational activities on site will contribute to further loss of biodiversity in the area.	Low
Aboriginal Cultural Heritage Non-Indigenous Heritage	Disturbance or destruction of items of Aboriginal Heritage.	Damage or destruction to items of Aboriginal Heritage during construction works. Highly unlikely considering the previous land use and lack of construction in this proposal.	Low
	Disturbance or destruction of items of Non-Aboriginal Heritage.	Highly unlikely considering the previous land use and lack of construction in this proposal.	Low

Issue	Potential Impacts	Comment	Preliminary Risk Ranking
Socio-Economic	Impact on local economy	Net positive impact on local economy through generation of employment, increase in supply of recovered aggregate and treated drilling muds to civil construction market.	Low
Urban and Visual Design	Impact to visual amenity from main road or neighbouring properties, due to construction of new facility	The development is unlikely to cause any significant adverse impacts on views and vistas to and from public places, residential dwellings, landmarks or heritage items.	Low
	Potential negative impacts on the locality due to increased traffic.	The development has the potential to increase traffic volumes on the surrounding road network	Moderate
	Potential negative social impacts due to amenity issues including, noise, air pollution, visual amenity and pests.	The proposal is suitably located within an industrial location, however, without mitigation measures there is potential to adversely affect the local amenity due to odour impacts.	Low
Hazard and Risks	Fire	Potential fire risks associated with the Proposal include contact with flammable materials received on site, malfunction of machinery, fire at neighbouring properties, or vehicle fire.	Moderate
	Chemical or fuel spill	Spills of hazardous materials. Contamination of local waterways or accidental discharge to stormwater.	Moderate
	Flood	Floodwater damaging equipment, vehicles, plant, or risk to human health. Existing design mitigates flood risk.	Low
Fire Safety	Fire	Fire caused by flammable materials, malfunction of machinery, fire at neighbouring properties, or vehicle fire.	Moderate
Human Health	Human exposure to hazardous chemicals or pollutants via a chemical spill	Unintended human contact with hazardous chemicals may result in adverse health impacts to humans through the unintentional release of chemicals within the facility and/or externally to the site through the stormwater system.	High
	Air Quality	Human exposure to hazardous chemicals or pollutants.	High

Issue	Potential Impacts	Comment	Preliminary Risk Ranking
	Noise	Continued exposure to high levels of noise can potentially cause adverse health impacts to workers such as hearing loss.	Low
	Fire	Smoke inhalation and burns as a result of fire constitute a potential risk to human health	Moderate
Construction and Infrastructure	Impact on the overall built form of the site.	No construction works are proposed, only installation within the building.	Low
	Impact on any pre-existing infrastructure or easement on or off the site.	No existing easements or affected infrastructure assets are located in proximity to the Proposal site.	Low

3.2 Environmental Management Activities and Controls

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

3.2.1 Soil and Water

Table 8: Soil and Water - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Leachate entering stormwater drains		
No processing or stockpiling of materials will occur outside of the buildings, preventing stormwater coming into contact with waste material.	Site Supervisor	Fit out and ongoing during operational phase
Liquid inputs will be stored in tanks or sealed in IBCs.	Site Supervisor	Ongoing during operation
Discharges to liquid wastewater system and stormwater system will be separate.	Site Supervisor	Ongoing during operation
Transfer of liquid waste from truck to storage tanks will occur within an enclosed building.	Site Supervisor	Ongoing during operation
Liquid waste processing areas will be bunded.	Site Supervisor	Ongoing during operation
Blind sump pits will be installed within bunded areas.	Site Supervisor	Ongoing during operation
Safety and procedural signage will be installed.	Site Supervisor	Fit out and ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
Sump pits and storage tanks will undergo regular inspection and maintenance.	Site Supervisor	Ongoing during operation
Discharge to sewer of NATA tested outputs will occur under and in compliance with a trade waste licence.	Site Supervisor	Ongoing during operation
Liquid waste that does not meet trade waste requirements will be removed by tanker and taken to an appropriately licensed facility.	Site Supervisor	Ongoing during operation
Hazardous waste will be stored above the PMF flood level, with appropriate containment and bunding.	Site Supervisor	Ongoing during operation
Implementation of procedures and training in spill avoidance and response protocols	Site Supervisor	Fit out and ongoing during operational phase
Clean up equipment and spill kits specifically designed to deal with regular small spills will be provided.	Site Supervisor	Ongoing during operational phase
A spill management plan and / or an emergency response procedure will be developed for large fuel spills.	Site Supervisor	Ongoing during operational phase
All staff will be trained in the emergency response procedure for large spills and all staff will know where the written procedure is kept.	Site Supervisor	Ongoing during operational phase
The fuel tank on Site will be bunded to comply with the requirements of AS1940:2004 <i>Storage and Handling of Flammable and Combustible Liquids</i> .	Site Supervisor	Ongoing during operational phase
Regular inspection will be undertaken of liquid (including fuel) storage areas, bunding and levels.	Site Supervisor	Ongoing during operational phase
Ongoing review and revision of management plans will be undertaken.	Site Supervisor Kiora One management	Fit out and ongoing during operational phase
Potential Impact: Firewater entering stormwater drains		
Bunding will be constructed in Building 2 and Building 3 to contain firewater.	Site Supervisor	Fit out
The shut-off valve in Building 1 will be activated in the case of a fire.	Site Supervisor	During operational phase
Potential Impact: Disturbance of acid sulfate soils (ASS) or potential acid sulfate soils (PASS) causing environmental harm		
No earthworks are required. If construction or earthworks are required in future, appropriate approvals will be sought.	Site Supervisor	Fit out and ongoing during operational phase
Potential Impact: Flood water entering site		

Control Measure	Responsibility	Timing Frequency
Facility will be constructed above flood planning levels.	Site Supervisor	Fit out and ongoing during operational phase
Hazardous materials will be stored above the PMF level.	Site Supervisor	Ongoing during operation
Liquid wastes will be banded to a minimum of 100% of the largest tank or container in which they are stored	Site Supervisor	Ongoing during operation
Evacuation Plans will be produced that identify the evacuation route and assembly area and will be displayed in prominent locations throughout the facility.	Site Supervisor	Fit out and ongoing during operational phase
A Flood Emergency Response Plan will be produced in consultation with the NSW SES.	Site Supervisor	Ongoing during operation

3.2.2 Traffic and Access

Table 9: Traffic and Access - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Reduction in safety on site with increased traffic volumes and frequency		
Only vehicles associated with operations and site related activities will attend site.	Site Supervisor	Ongoing during operation
Traffic will enter and leave in a forward-facing direction.	Site Supervisor	Fit out and ongoing during operational phase
Speed limits will be adhered to on site.	Site Supervisor	Fit out and ongoing during operational phase
All vehicles entering and exiting the site must follow the designated routes.	Site Supervisor	Fit out and ongoing during operational phase
51 car parking spaces will be provided and maintained on site.	Site Supervisor	Ongoing during operation
Potential Impact: Reduction in road safety as a result of increased number of vehicles operating on the road networks around the site		
Truck and staff arrival and departure times will be scheduled to be staggered throughout the day and night.	Site Supervisor	Fit out and ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
There will be no queueing of incoming trucks on Kiora Crescent. All incoming trucks will await access to weighbridge or unloading bays within the site.	Site Supervisor	Fit out and ongoing during operational phase

3.2.3 Waste Management

Table 10: Waste Management - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Waste generated by the site		
Fit out and installation waste will be managed according to the management methods outlined in the Operational Waste Management Plan prepared for the proposed development, as approved under DA2019/457/1.	Site Supervisor	Fit out phase
Where possible all construction waste and waste materials will be reused or recycled.	Site Supervisor	Ongoing during fit out phase
Internal roads, kerbs and channels will be inspected, maintained and cleaned regularly to keep them free of oil and litter.	Site Supervisor	Ongoing during operational phase
Potential Impact: Disruption to operations		
All equipment and machinery will be inspected and undergo regular maintenance to ensure a high level of operational efficiency is maintained.	Site Supervisor	Ongoing during operational phase
No obsolete or useless machinery / equipment will be kept on site.	Site Supervisor	Ongoing during operational phase
Materials stockpile capacities allow for downtime in operations.	Site Supervisor	Ongoing during operational phase
Excess materials can be re-directed to another licensed facility.	Site Supervisor	Ongoing during operational phase
Potential Impact: Receipt of non-conforming waste at the site		
Non-conforming loads (not indicative of the streams described in this EIS) will be directed to a facility that is licensed to receive it.	Site Supervisor	Ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
Non-conforming waste and residual waste will be stored separately and will not be re-mixed with waste streams on site.	Site Supervisor	Ongoing during operational phase
Record Keeping and Reporting will be in accordance with the PoEO (Waste) Regulation.	Site Supervisor	Ongoing during operational phase
Potential Impact: Pollution of environment		
Materials will be managed in accordance with site protocols, the terms of the EPL and PIRMP and this Environmental Management Plan.	Site Supervisor	Ongoing during operational phase
All waste will be delivered and processed internal to buildings.	Site Supervisor	Ongoing during operational phase
All areas external to the buildings will be maintained in a clean, tidy and litter free condition.	Site Supervisor	Ongoing during operational phase
Outputs will be sent to sites that are legally permitted to receive that type of material.	Site Supervisor	Ongoing during operational phase
Grassed and landscaping areas will be watered and generally maintained on a regular basis to maintain a high standard of public image. Grassed areas will be mown as required during seasonal variations and kept free of any windblown litter.	Site Supervisor	Ongoing during operational phase
All signs on site will be professionally painted and maintained in a clean and legible condition. Signs will be washed in accordance with a maintenance schedule (or as necessary).	Site Supervisor	Ongoing during operational phase
Discharge to sewer will be in accordance with a trade waste licence.	Site Supervisor	Ongoing during operational phase

3.2.4 Noise and Vibration

Table 11: Noise and Vibration - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Noise impacts on adjacent receivers from fit out works		
All installation works will occur inside the pre-existing warehouse units. No works will be required to occur outside.	Site Supervisor	Fit out phase

Control Measure	Responsibility	Timing Frequency
The recommendations set out in the Acoustic report will be observed.	Site Supervisor	Fit out and ongoing during operational phase.
Potential Impact: Noise impacts on adjacent receivers from site operations		
The majority of operations will occur within the enclosed building.	Site Supervisor	Ongoing during operational phase
The recommendations set out in the Acoustic report will be observed.	Site Supervisor	Fit out and ongoing during operational phase
Vehicle engines will be turned off when not required.	Site Supervisor	Fit out and ongoing during operational phase
Where possible, heavy vehicle movements will be scheduled to day and/or evening periods.	Site Supervisor	Fit out and ongoing during operational phase
The use of reversing alarms or alternatively installing “squawkers” for forklifts will be implemented where feasible.	Site Supervisor	Fit out and ongoing during operational phase
Training of staff and employees will include a noise awareness component, community consultation and response to complaints.	Site Supervisor	Fit out and ongoing during operational phase
The roller shutters of the site will be closed when not in use.	Site Supervisor	Ongoing during operational phase.

3.2.5 Air Quality

Table 12: Air Quality - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Air pollution (dust and exhaust emissions) from construction and installation activities on site.		
All installation activities on site will be contained within the industrial units, which are already built.	Site Supervisor	Fit out phase
Potential Impact: Odour impacts on sensitive receivers from site operations.		
All operations are to be handled indoors within the warehouse premises.	Site Supervisor	Ongoing during operational phase.
Installation of a Biotrickling filter system to treat displaced air from tanks filling, using a packed bed	Site Supervisor	Ongoing during operational phase.

Control Measure	Responsibility	Timing Frequency
bioreactor to control pollutants as the tank air is drawn through the material		
All liquid waste will be transported via tanker trucks, intake and offtake is to occur in bunded areas, storage of liquid wastes to occur liquid waste storage tanks and handled within the premises of the warehouse	Site Supervisor	Ongoing during operational phase.
A deodoriser system will be installed within Building 1, with deodorising spray points positioned at the top of the front roller doors and spray inwards within the building. Additional spray points will be positioned on the back wall of the facility pointed towards the filtering/screening process and would spray at 15-minute intervals. Water supply for any deodorisers will be supplied with fresh water, not recycled water, to minimise the likelihood of air-borne bacterial contaminants being present in the misted/sprayed water.	Site Supervisor	Fit out and ongoing during operational phase
Potential Impact: Dust emissions from trucks entering and exiting site.		
External roadways at the Proposal site will all be constructed of hardstand/paved surface which would be regularly swept to ensure that silt loadings are minimised.	Site Supervisor	Fit out and ongoing during operational phase
Potential Impact: Dust emissions from stockpiles of material.		
All operations will to be undertaken indoors within the warehouse premises.	Site Supervisor	Ongoing during operational phase.
The shredding of packaging as part of the product destruction process is unlikely to produce significant impact in terms of particulate emissions.	Site Supervisor	Ongoing during operational phase.
Potential Impact: Air pollution (exhaust emissions) from vehicles, plant and equipment from site operation.		
All plant and vehicles will be serviced and maintained regularly. Any vehicles causing excessive air pollution will be identified and reported.	Site Supervisor	Fit out and ongoing during operational phase.
Staff will follow expectations and protocols for site set out within this EMP, including procedures for the recording, evaluation and actioning of complaints arising from the proposed activities.	Site Supervisor	Fit out and ongoing during operational phase
Potential Dust emissions from processing of material		

Control Measure	Responsibility	Timing Frequency
All operations will to be undertaken indoors within the warehouse premises.	Site Supervisor	Ongoing during operational phase.
Throughputs are not likely to produce dust.	Site Supervisor	Ongoing during operational phase.

3.2.6 Biodiversity

Table 13: Biodiversity - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Disturbance or damage to flora and fauna as a result of fit out activities on site.		
No vegetation will be removed under this proposal	Site Supervisor	Ongoing during construction phase
Potential Impact: Disturbance or damage to flora and fauna as a result of ongoing operation of site.		
Vegetation and landscaping will be regularly maintained.	Site Supervisor	Ongoing during operational phase

3.2.7 Heritage

Table 14: Heritage - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Disturbance or destruction of items of Aboriginal Heritage		
No earthworks are to occur under this proposal. Should an item of Indigenous significance, or suspected significance, be discovered during construction or operation, all work in the vicinity of the area will cease and Kiara One management will be contacted as soon as possible to determine the subsequent course of action, such as contacting a heritage professional, notifying the NSW Department of Environment, Energy and Science and the LALC.	Site Manager	Fit out and ongoing during operational phase
Potential Impact: Disturbance or destruction of items of Non-Indigenous Heritage		
The likelihood of disturbing or damaging any items of non-Indigenous heritage under this proposal is very low. Should an item of non-Indigenous significance, or suspected significance, be discovered during construction or operation, all work in the vicinity of the area will cease and Kiara One management will be contacted as soon as possible to determine the subsequent course of action, such as contacting a	Site Manager	Fit out and ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
heritage professional, notifying the NSW Department of Environment, Energy and Science and the LALC.		

3.2.8 Socio-economic

Table 15: Socio-economic- Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Detrimental social impacts on the locality due to increased traffic, noise, and air pollution, and decreased visual amenity		
No negative social impacts are anticipated to occur as a result of the construction and operation of the proposal.	-	Ongoing during operational phase
Potential Impact: Local economic impact		
The Proposal will result in a net social benefit due to the generation of 33 full time equivalent jobs in the Cumberland LGA.	-	Ongoing during operational phase

3.2.9 Visual Impact

Table 16: Visual Impact- Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Impact to visual amenity from main road or neighbouring properties, due to construction of new facility		
There will be no new structures or modifications to the existing building exterior. The development is unlikely to cause any significant adverse impacts on views and vistas to and from public places, residential dwellings, landmarks or heritage items. The site will maintain vegetation screening along the site perimeter.	Site Supervisor	Ongoing during operational phase
Potential Impact: Amenity or safety in locality due to increased traffic.		
Vehicles will access the site via an industrial area. The local road network is not expected to be adversely affected by traffic volumes.	Site Supervisor	Ongoing during operational phase
Potential Impact: Amenity issues including, noise, air pollution, visual amenity and pests.		
All areas external to the buildings will be maintained in a clean, tidy and litter free condition.	Site Supervisor	Ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
The site will generate noise due to processing equipment. The location is appropriate for the development type and scale.	Site Supervisor	Ongoing during operational phase
There will be no new structures or modifications to the existing building exterior. The site location within an industrial area will minimise any visual amenity impact.	Site Supervisor	Ongoing during operational phase
Pest control will be implemented at the site, particularly for the product destruction facility.	Site Supervisor	Ongoing during operational phase
Gardens and vegetated areas will be maintained.	Site Supervisor	Ongoing during operational phase

3.2.10 Hazard and Risks

Table 17: Hazard and Risk - Potential Impacts and Controls

Control Measure	Responsibility	Timing Frequency
Potential Impact: Risk of fire		
Flammable materials will be stored in appropriate containers and away from ignition sources.	Site Supervisor	Ongoing during operational phase
Diesel fuel and hydraulic oil will be stored in accordance with the AS 1940:2017 - <i>The storage and handling of flammable combustible liquids</i>	Site Supervisor	Fit out and ongoing during operational phase
A detailed HAC study would be completed for the proposed development as part of the Environmental Management System (EMS) during detailed design, and prior to commencement of operations at the site.	Site Manager	Fit out and ongoing during operational phase
Staff training and the implementation of management procedures will reduce fire risk.	Site Manager Site Supervisor	Ongoing during operational phase
Signs will identify the storage locations of different substances.	Site Supervisor	Ongoing during operational phase
Barriers will be constructed to an appropriate standard to partition storage areas.	Site Supervisor	Ongoing during operational phase
Combustible materials will be managed to reduce fire risk in accordance with guidance documentation.	Site Supervisor	Ongoing during operational phase
Flammable materials would be stored in appropriate containers and away from ignition sources.	Site Supervisor	Ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
The flammable material storage and handling areas shall be subject to hazardous area classification in accordance with AS/NZS 60079.10.1:2022 and electrical equipment in this area will be installed in accordance with that standard.	Site Supervisor	Fit out and ongoing during operational phase
Annual fire safety statement will be maintained with assistance from expert fire inspection contractors.	Site Supervisor	Ongoing during operational phase
Firefighting equipment to be checked and tested regularly.	Site Supervisor	Ongoing during operational phase
Staff training in emergency response, including: <ul style="list-style-type: none"> • Fire awareness • Using firefighting equipment • Emergency evacuation procedures 	Site Manager Site Supervisor	Ongoing during operational phase
Site information will be produced and displayed prominently to convey location of fire systems and stockpile locations.	Site Supervisor	Ongoing during operational phase
Implementation of Environmental Aspects and Impacts (EAI) register	Site Supervisor	Ongoing during operational phase
Dissemination of information relating to emergency response as set out in this EMP.	Site Manager Site Supervisor	Ongoing during operational phase
Provision of adequate fire services and equipment to reduce the risk of fire occurring on site.	Site Supervisor	Fit out and ongoing during operational phase
BCA compliance will be achieved, and identified fire suppression equipment and infrastructure will be installed prior to occupying the site.	Site Supervisor	Fit out and ongoing during operational phase
The site shall be capable of containing potentially contaminated water for the worst-case credible fire scenario with respect to contaminated water generation within the site boundaries.	Site Supervisor	Fit out and ongoing during operational phase
The walls of Class 3 storage area will be constructed of concrete having an FRL of 240 / 240 / 240.	Site Supervisor	Fit out
Potential Impact: Chemical or fuel spill		
All staff and visitors on site will follow the EMP.	Site Supervisor	Ongoing during operational phase
Bunding will be utilised for liquid storage containers / areas. Bunding shall be 110% of the largest tank or	Site Supervisor	Fit out and ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
25% of the total volume in each storage area, whichever is the greater volume.		
A Hazard and Operability study will be undertaken to identify if there are sufficient protections against deviating processing conditions.	Site Manager	Commissioning and ongoing during operational phase
A Pollution Incident Response Management Plan will be developed in accordance with <i>AS 3745 - 2010 Planning for emergencies in facilities</i> All fuel and hazardous chemicals on site will be stored in bunded areas with spill kits located nearby.	Site Supervisor	Ongoing during operational phase
A register of hazardous chemicals will be compiled and kept up to date, including safety data sheets. Chemical use and storage will be undertaken in accordance with waste product safety data sheets.	Site Supervisor	Ongoing during operational phase
Hazardous chemicals will be managed in accordance with the placard and manifest requirements in Schedules 11-13 of the Work Health and Safety Regulation (as required), Safety Data Sheets and relevant guidance documents. Incompatible chemicals will be separated.	Site Supervisor	Ongoing during operational phase
Regular inspections of materials and storage locations will be undertaken to ensure adequacy of storage provisions e.g. volume, bunding volume and condition, correct storage (e.g. refrigerated or airtight as required). Incompatible chemicals will be kept separate with clear signage and delineation used.	Site Supervisor	Ongoing during operational phase
Chemical inventory will be managed in line with best practice including: <ul style="list-style-type: none"> • Unnecessary chemicals will be safely disposed of (e.g. unwanted, out of date); • Empty containers will be correctly disposed of; • All chemicals to be clearly labelled; • Storage area to be kept clean and organised; • No food or personal belongings stored near chemicals. 	Site Supervisor	Ongoing during operational phase
The water treatment chemicals storage area in the liquid processing building shall be subject to a design assessment against AS3780:2023.	Site Supervisor	Fit out phase
The Dangerous Goods stores in Unit 2 shall be subject to a design assessment in accordance with AS3833:2024.	Site Manager	Fit out and ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
A dedicated “decanting area” will be defined within Unit 2, with an extraction system to remove vapours during decanting.	Site Manager	Fit out and ongoing during operational phase
Signs will identify the storage locations of different substances	Site Supervisor	Ongoing during operational phase
Training will be provided on appropriate safeguards and PPE, which will be used as required.	Site Supervisor	Ongoing during operational phase
The building will be ventilated.	Site Supervisor	Ongoing during operational phase
A Work Health and Safety Management Plan (WH&SMP) will be produced for the site to identify measures to minimise risk to human health and safety.	Kiora One Site Supervisor	Ongoing during operational phase
A Pollution Incident Response Management Plan will identify, assess, and mitigate the potential pollution incidents	Kiora One Site Supervisor	Ongoing during operational phase
Emergency Response will be carried out in accordance with this EMP (including Section 2.5.3).	Site Supervisor	Ongoing during operational phase
Transfer of dangerous goods would be in accordance with the Australian dangerous goods code and EPA requirements	Site Supervisor	Ongoing during operational phase
Potential Impact: Noise – Human health		
Control measures to minimize human exposure to excessive noise levels include: <ul style="list-style-type: none"> • The use of appropriate PPE; and • Regular equipment maintenance Relevant health checks would be undertaken at a minimum of every 2 years	Site Supervisor	Ongoing during operational phase
An Occupational Health and Safety System in accordance with OH&S AS/NZS ISO 45001:2018 will be developed for the site	Site Supervisor	Ongoing during operational phase
Potential Impact: Security - damage to site / plant / equipment		
Security cameras will be installed around the site on the inside and outside of buildings and at the site entrance.	Site Supervisor	Ongoing during operational phase
Signage will be erected to discourage illegal dumping and trespass.	Site Supervisor	Ongoing during operational phase

Control Measure	Responsibility	Timing Frequency
The site will be entirely surrounded by fencing.	Site Supervisor	Ongoing during operational phase
The site will be secured with lockable gates.	Site Supervisor	Ongoing during operational phase
Forklifts will be locked and securely stored when not required for use.	Site Supervisor	Ongoing during operational phase

3.3 Environmental Schedules

This EMP refers to a number of environmental schedules comprising forms, registers and checklists. They are listed below and in **Appendix B**. These are predominantly operational level documents, which will be produced prior to occupation.

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

4 Monitoring and Review

4.1 Environmental Monitoring

Kiora One will monitor the environmental controls listed in Section 3.2 through regular site environmental inspections.

Site environmental inspections will be undertaken on a daily/ weekly basis and will be recorded by the Site Supervisor on the Site Inspection Checklist (see **Appendix B**).

Management and performance indicators will track:

- Implementation of the policies and training included in this EMP and other management plans such as the site PIRMP;
- Conformance, e.g. legal compliance, fines, and penalties; and
- Community relations/complaints.

Operational performance indicators will track:

- Inputs, outputs, residual waste.

A quarterly meeting of management staff will manage and record environmental obligations, such as:

- Legal compliance;
- Fines;
- Community complaints;
- Operations;
- Environmental audit results; and
- Non-conformance

4.2 Environmental Auditing

Quarterly site audits aimed at evaluating the environmental conformance of the site operations will be carried out by Kiora One. Any deficiencies identified during the audits shall be documented and actioned in accordance with Kiora One corrective action process (see Section 4.5).

The audits to be carried out and their frequency are listed in Table 18.

Table 18: Site Audit Plan

Audit Type	Frequency	Record	Auditor
Environmental Management Plan	Yearly	Audit Report	Site Manager / External Auditor
Sub-contractor Environmental Performance Audit	Yearly	Audit Report	Site Manager / External Auditor
Site Inspection	Daily / Weekly	Site Environmental Inspection Checklist	Site Supervisor

4.3 Communication

To minimise impacts on the public by the site operations, residents and adjacent property owners will be notified in writing before construction works commence and at appropriate stages during the operation of the facility. The letter will contain details of the intended work, where relevant, the duration of the activities, information regarding any access interruptions and details of whom to contact with questions regarding the works. The Site Manager will seek permission if there is any need to access private property.

Project Signage will be erected at the site, as required and appropriate.

Kiora One 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 works, incidents and emergencies and contacting regulatory agencies if required.

4.4 Complaints

Community groups, customers, interested parties, etc may advise of practices, activities and processes that are related to the environment by a variety of methods. These may include a non-conformance report, email/letter, telephone complaint, newspaper/magazine report and verbal protest.

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

4.5 Corrective Action

A non-conformance occurs when a procedure or environmental control is not followed or does not perform as required by this EMP. Kiora One will monitor non-conformances to the EMP and initiate corrective and preventive action where required. All non-conformances will be recorded on the *Non-Conformance Report Form* (see **Appendix B**).

Kiora One will undertake corrective action in case of incidents that have an environmental impact or works not carried out according to the required standard. Procedures for identifying corrective action include:

- an EMP review;
- investigation into the causes of incidents and recording of the results; and
- evaluating further environmental risks.

5 EMP 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 as necessary as a result of any of the following:

- when there is a change in the site activities that requires a change in environmental controls;
- when there is a need to improve performance in an area of environmental impact;
- at the completion of environmental audits as required; or
- as a result of changes in environmental legislation applicable and relevant to the site and operations.

Reasons for making changes to the EMP will be documented. A copy of the original EMP document will be kept for the project records.

The Site Manager is authorised to change and re-issue the EMP. The Site Supervisor is to be informed of any changes made by the Site Manager.

The Site Supervisor is responsible for ensuring the work crew are complying with the current EMP, and for informing the work crew of any changes. The Site Supervisor is responsible for ensuring the workers are aware of changes before starting any works or operation.

Appendix A Licences, Permits and Approvals

Appendix B Environmental Schedules

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

Appendix C Pollution Incident Response Management Plan (PIRMP)

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