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# MAINFREIGHT DISTRIBUTION PTY LTD

## WAREHOUSE 7 OCCUPATION ENVIRONMENTAL MANAGEMENT PLAN

Moorebank Precinct East



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### REVISIONS

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## ACRONYMS AND DEFINITIONS

Acronym / Term	Meaning
BMP	Bushfire Management Plan
CARs	Corrective actions request
CBD	Central Business District
CoC	Conditions of Consent
Commonwealth CoA	Commonwealth Conditions of Approval
DotEE	Commonwealth Department of the Environment and Energy
DPIE	Department of Planning, Industry and Environment
DPI	Department of Primary Industries
DPI Fisheries	NSW Department of Primary Industries Fisheries division
DPI Water	NSW Department of Primary Industries Water division
EIS	Environmental Impact Statement
EMS	Environmental Management System
Environmental Emergency	Any event that causes or has the potential to cause material harm to the environment. An environmental emergency is a Class 3 incident.
Environmental Incident	A set of circumstances resulting in harm, or potential harm, to the environment. Environmental incidents include pollution incidents and environmental emergencies. Environmental incidents may arise from natural (e.g. storm, wind or bushfire) or human factors.
EP&A Act	Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
EPRMP	Emergency Preparedness and Response Management Plan
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999
GFA	Gross floor area
GHG	Greenhouse gas
LCC	Liverpool City Council
LGA	Local Government Area
Material harm	Material harm is harm that: <ul style="list-style-type: none"> <li>• Involves actual or potential harm to the health or safety of human beings or to Ecosystems that is not trivial, or</li> <li>• Results in actual or potential loss or property damage of an amount, or amounts in Aggregate, exceeding \$10,000, (such loss includes the reasonable costs and Expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).</li> </ul>

Acronym / Term	Meaning
Moorebank Precinct	Refers to the whole Moorebank intermodal precinct, i.e. the MPE and the MPW.
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
NGER	National Greenhouse and Energy Reporting
OEH	Office of Environment and Heritage
Operational area / Operational footprint	Extent of operational activities for the operation of the Project
POEO Act	Protection of the Environment Operations Act 1997
Pollution Incident	A set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).
PIRMP	Pollution Incident Response Management Plan
Rail link	Part of the MPE Stage 1 Proposal (SSD 6766), connecting the MPE site to the SSFL. The Rail link is to be utilised for the operation of the Proposal.
RMS	Roads and Maritime Services
SHEMS	Safety Health and Environmental Management System
SIMTA	Sydney Intermodal Terminal Alliance
SSD	State significant development
SSFL	Southern Sydney Freight Line
The Project	MPE Stage 1 and MPE 2 Project.
MOD 6	Modification 6

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## ATTACHMENTS

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

# 1 BACKGROUND

## 1.1 Introduction

MAINFREIGHT DISTRIBUTION PTY LTD are a global logistics provider. Mainfreight offers managed warehousing and international and domestic freight forwarding. With team and branches across Australia, China, Europe, New Zealand and the Americas Mainfreight continues to expand its global footprint. Listed on the New Zealand Stock Exchange Mainfreight continue to work towards their 100-year vision.

## 1.2 Context of the WOEMP

The operation of the MPE Precinct must be undertaken in accordance with the Conditions of Consent (CoC) and the approved Framework Operational Environmental Management Plan (FOEMP), which has been developed by LOGOS to manage potential environmental impacts resulting from operational activities.

CoC C6 (SSD 7628) requires that each warehouse operator operated under a Warehouse OEMP (WOEMP), which considers the potential environmental impacts resulting from the operation of the warehouse. This document addresses this requirement.

This WOEMP details how the environmental management requirements for MAINFREIGHT DISTRIBUTION PTY's operation at Warehouse 7 will be managed. The aim of the WOEMP is to document processes for implementation which are compliance with environmental legislation and how environmental risks associated with the operation are implemented. This Plan has been developed to be consistent with the requirements of the MLP OEMP, subplans and requirements.

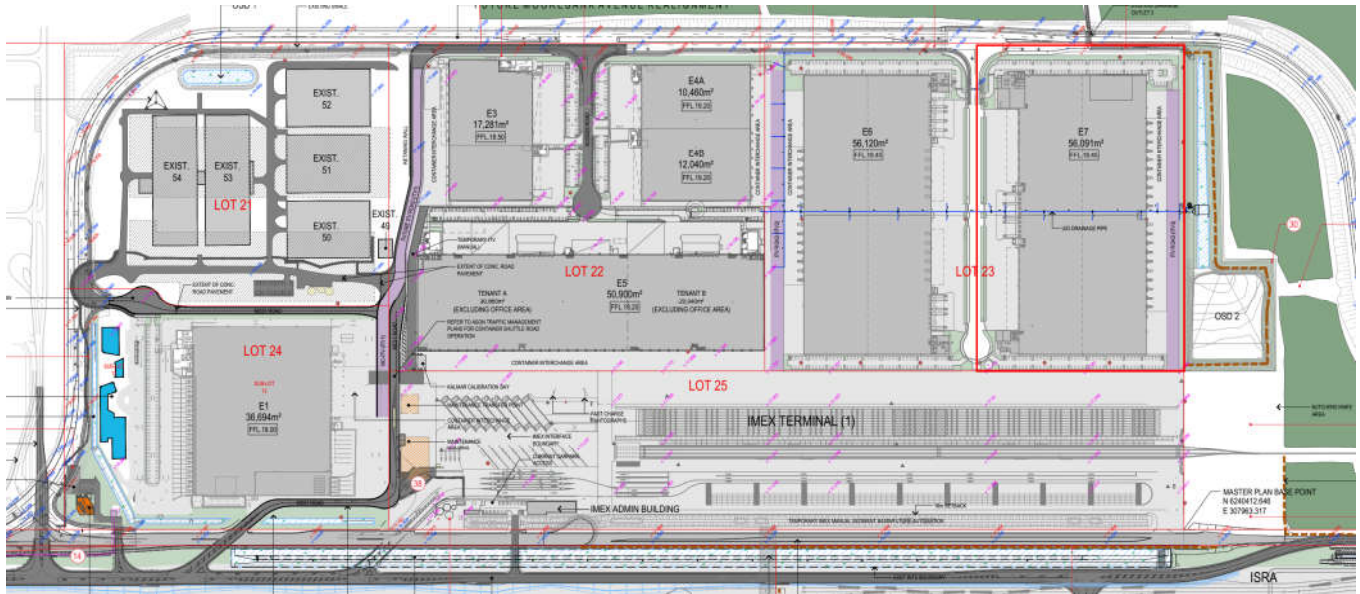
MAINFREIGHT DISTRIBUTION PTY LTD now occupy Warehouse 7 and will utilise this WOEMP in their day-to-day operations at the site.

MAINFREIGHT DISTRIBUTION PTY LTD will be required to maintain records (e.g., waste, water, and energy usage) and provide LOGOS with documentation of environmental inspections and procedures if requested.



### 1.3 Site Description

The Moorebank logistics park is located 35 kilometers (southwest) from the Sydney central business district. The site is located at Warehouse 7 of the Moorebank Logistics Park East Precinct on Moorebank Avenue (See **Figure 1**). Warehouse 7 covers an area of 11.33ha. The Warehouse is owned by LOGOS with MAINFREIGHT DISTRIBUTION PTY LTD leasing the warehouse.



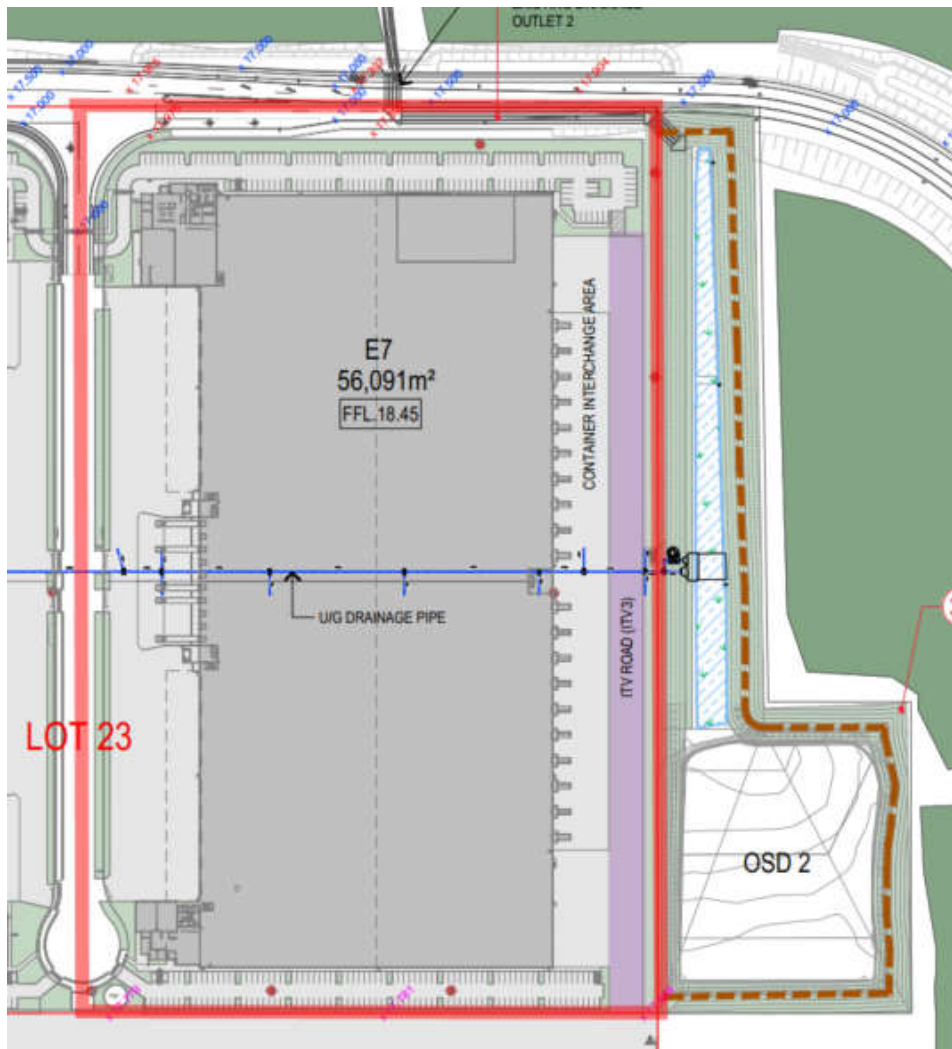
**Figure 1: Location of Warehouse 7 (in red)**

MAINFREIGHT DISTRIBUTION PTY LTD operates Warehouse 7, which covers an area of approximately 56,091 m<sup>2</sup>.

The MAINFREIGHT DISTRIBUTION PTY LTD warehouse comprises:

- 1400 m<sup>2</sup> Main office, administration facilities and amenities.
- 56,091 m<sup>2</sup> of warehouse area.
- Car parking
- Truck loading/unloading docks
- External parking for pick-up and delivery vehicles (PUD)
- Specialised sorting and conveyor equipment
- Hardstand areas that provide trailer parking spaces, external PUD parking spaces, vehicle maneuvering areas and access to the main internal site road
- Signage for business identification purposes, including backlit illuminated signage on each warehouse.

**Figure 2** shows the extent of the Warehouse 7 and its surrounding areas. The MAINFREIGHT DISTRIBUTION PTY LTD operational Boundary covered by this WOEMP is indicated by the red boundary line shown in **Figure 2**.



**Figure 2: Warehouse 7 – showing the location and operational boundary (shown in Red) of Warehouse 7**

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

## 1.4 Purpose and Objectives

The objectives of this Warehouse OEMP are to:

- Identify and implement relevant environmental legal and other regulatory requirements applicable to the operation of the warehouse.
- Provide for the effective management of the environmental concerns and potential adverse environmental effects arising from the operation of the warehouse.
- Establish and define environmental roles and responsibilities.
- Identify appropriate impact mitigation measures and management strategies in response to potential adverse environmental effects.
- Provide warehouse personnel with sufficient information to undertake their operational activities in accordance with the development CoC, contractual, legal and other relevant environmental requirements.
- Ensure that the operational commitments of the CoC are captured and implemented on-site.
- Ensure that senior management and operational personnel understand their environmental duty of care under legislation and terms of the contract.
- Meet the requirements of, and align with, LOGOS's Environment Management System (EMS), as certified under AS/NZS ISO 14001:2015 Environmental Management System.

Implementing this warehouse OEMP effectively will enable LOGOS and the warehouse tenants to meet the regulatory and policy requirements in a systematic manner and to continually improve environmental performance.

## 2 TENANT / WAREHOUSE OPERATOR AND SITE OVERVIEW

### 2.1 Operator details

Environmental management responsibility for Warehouse 7 will be managed by:

**Table 1: Operator details**

Operator Details	
Name	MAINFREIGHT DISTRIBUTION PTY LTD DISTRIBUTION PTY LTD
Address	1 East, 400 Moorebank Avenue, Moorebank NSW 2170
Contact person	Craig Smith
Contact details	Mainfreight. Global Supply Chain Logistics 7A Marcus Place Moorebank NSW 2170 AUSTRALIA Mob: +61 407 945 773

### 2.2 Description of Operations

MAINFREIGHT DISTRIBUTION PTY LTD has a leasing agreement with LOGOS to operate warehouse and distribution activities from Warehouse 7.

Day-to-day activities include:

- Unloading and loading of transport vehicles both heavy and light.
- Packing and unpacking of containers
- Storage of goods into a grid of movable racks
- Packaging of products into small to medium size cartons in the order of 2 – 10 kgs.
- Truck movements in and out of the site
- Electric Forklift operation in the warehouse and loading dock vicinity
- Placement of containers from and to the IMEX terminal is controlled by Qube.
- Packing and unpacking of containers
- Storage of goods
- Truck movements in and out of Warehouse 7
- General office administrative and support functions.

MAINFREIGHT DISTRIBUTION PTY LTD's warehouse and distribution operates 24 hours, Monday to Sunday

## 2.3 Plant and Equipment

Typical plant and equipment used in the operation varies between the internal and external warehouse environment:

Internal Warehouse Environment may include:

- Forklifts – Counterbalance and High Reach
- Conveyor systems
- Carton wrapping machines
- Pallet Storage racking and
- Automated storage and retrieval of AMR racks by Autonomous Mobile Robots

External Warehouse Environment may include:

- Freight carrying vehicles (Class 2 heavy vehicles up to and including B-doubles)
- Forklifts
- Compactor and Baler
- Waste removal trucks and
- Support and service vehicles.

## 3 ENVIRONMENTAL MANAGEMENT

### 3.1 Environmental Policy

MAINFREIGHT DISTRIBUTION PTY operates under the Mainfreight Environment Policy HRPOL 6 which is available at <https://www.mainfreight.com.au>.

The policy is subject to review and revision in accordance with Mainfreight systems. Refer to **Attachment 8**.

### 3.2 Environmental Management Structure

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

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

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

As Warehouse tenants, MAINFREIGHT DISTRIBUTION PTY LTD, has responsibility for general building/ premises upkeep and maintenance, including any open space or ancillary warehouse use, integrated building signage and lighting and waste management.

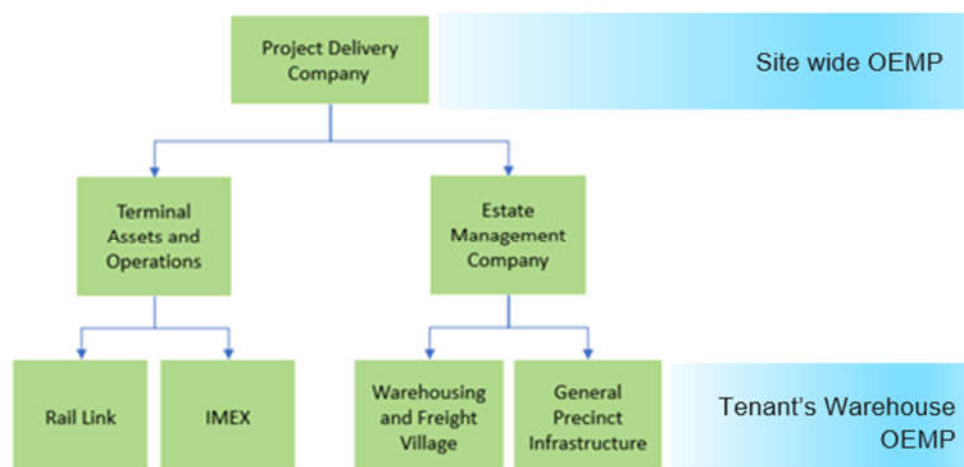
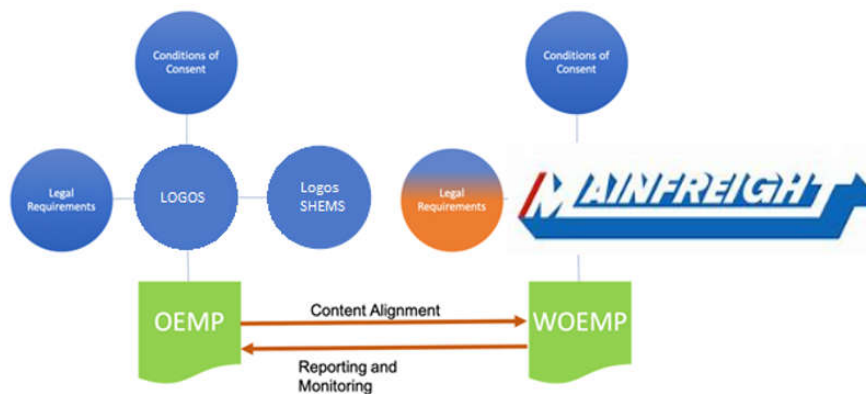


Figure 3: Precinct management structure



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

The relationship between LOGOS's OEMP, required under CoC C3, and MAINFREIGHT DISTRIBUTION PTY LTD's WOEMP, required under CoC C6, is demonstrated in Figure 4.



**Figure 4: Relationship between LOGOS's OEMP (SSD 7628 CoC C3) and the WOEMP**

**Figure 3** and **Figure 4** identifies that MAINFREIGHT DISTRIBUTION PTY LTD WOEMP is:

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

Figure 4 also demonstrates that the WOEMP has been prepared to address MAINFREIGHT DISTRIBUTION PTY LTD's legal requirements and its own SHEMS or requirements.

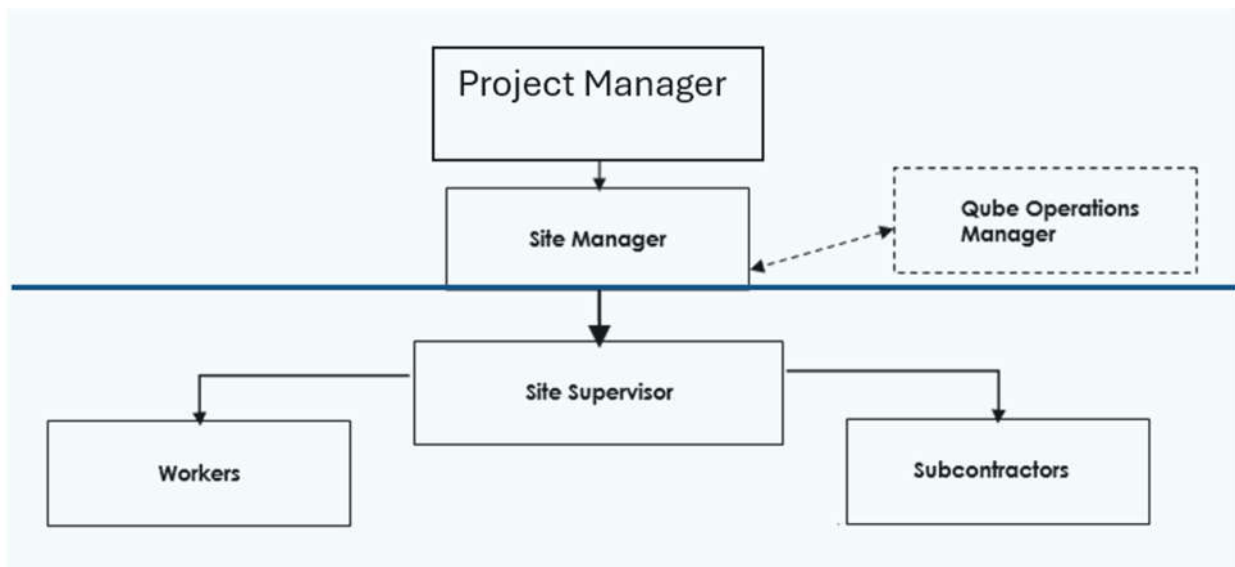
The WOEMP identifies a reporting and monitoring output to the Precinct OEMP to enable LOGOS/EMC to fulfil its monitoring, reporting and publication requirements under the CoC.

### 3.3 Environmental Management Responsibility

The primary responsibilities of MAINFREIGHT DISTRIBUTION PTY LTD workers with respect to the environment are described below.

The management structure is set out in Figure 5. A matrix of specific site responsibilities is set out in **Table 2**.

**Figure 5: Management structure**



#### Property manager

Responsibilities:

- Promoting and maintaining good environmental management.
- Facilitate the effective implantation of the WOEMP.
- Provide support to the Branch Manager and hold them accountable for their specific responsibilities.

#### Branch Manager

Responsibilities:

- Taking all practical measures to ensure the site is operating according to this WOEMP, and without risks to the environment.
- For taking prompt remedial action to eliminate any non-compliance or environmentally risky conditions.
- Liaising with LOGOS Operations manager to ensure consistency with the requirements of the MLP SHEMS, the OEMP and subplans and providing environmental records and procedures if requested.



## **Operations Manager**

### **Responsibilities:**

- Inducting all workers and subcontractors and directing site activities in accordance with this WOEMP
- Liaising with LOGOS Operations manager to provide environmental records, procedures and details of incidents if requested.
- Detecting any non-compliance or environmentally risky conditions.
  - If the Operations Manager does not have the necessary authority to fix a problem, they are responsible for reporting the matter promptly and recommending remedial action.

## **Workers**

### **Responsibilities:**

- All workers are required to attend site inductions and
- Follow the direction of this WOEMP.
- Advising the Branch Manager of any potential environmental issues

## **Subcontractors**

### **Responsibilities:**

- All subcontractors engaged to perform work for MAINFREIGHT DISTRIBUTION PTY LTD are required, as part of their contract, to comply with this WOEMP 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.

### 3.4 Project Environmental Roles & Responsibilities Matrix

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

2 = has responsibility for complying with the process/procedure

**Table 2: Project Environmental Roles & Responsibilities Matrix**

TASK	Property manager	Branch Manager	Operations Manager	Workers	Subcontractors
Inducting workers and subcontractors and directing site activities in accordance with the WOEMP.	2	2	1	2	2
Identifying, assessing, and eliminating any non- compliance or environmentally risky conditions and documenting the risk controls implemented.	2	1	2	2	2
Promoting and maintaining good environmental management in accordance with the relevant environmental legislation, regulations, and laws.	1	1	2	2	2
Implementing practical measures to ensure the site complies with this WOEMP, LOGOS's OEMP, Hazard and Risk Management Plan and Emergency Response Plan.	2	1	2	2	2
Maintaining, providing updates, and supplying this WOEMP to relevant authorities and workers.	2	1	2	2	2
Monitoring and assessing subcontractors for the project to ensure environmental regulations are met and relate to the works undertaken	2	2	1	2	2
Maintaining stocks for environmental control (eg. Spill kits)	2	1	1	2	1
Provide and maintain a hazardous substance register for hazardous substances used and stored in the workplace;	2	1	1	2	2
Provide and maintain records (e.g. waste, water and energy usage) and provide LOGOS with documentation of environmental inspections, incidents and procedures if requested.	2	2	1	2	2

### 3.5 Approval and Licensing Requirements

MAINFREIGHT DISTRIBUTION PTY LTD's operations at Warehouse 7 are undertaken in accordance with SSD 7628 CoC. **Table 3** below summarises the conditions pertaining to warehouse operations and where they are addressed in this plan.

**Table 3: CoC pertaining to warehouse operations**

CoC SSD 7628	Requirement	Document Reference
<b>General</b>		
A2 – A4	Terms of consent defining operation of development	Section 3
A12	Use of warehousing and distribution facilities	Section 2
A32	Plant and equipment maintained and operated in a proper and efficient condition and manner.	Section 4
C6	Preparation of WOEMP.	This plan.
C7	Form and content requirements of management plans.	This plan.
<b>Operational Traffic</b>		
B26 – B27	Operate in accordance with the Operational Traffic and Access Management Plan	Section 4.2.6
<b>Air Quality</b>		
B59	Operate in accordance with the Operational AQMP	Section 4.2.1
B60	Operation to not cause or permit emission of any offensive odour	Section 4.2.1
B61	Installation and operation of plant and equipment to comply with limits, air quality criteria and air monitoring requirements	Section 4.2.1
<b>Operational Noise</b>		
B79	Operation is permitted 24 hours 7 days per week.	Section 4.2.8

CoC SSD 7628	Requirement	Document Reference
B83	<p>Operate in accordance with the MPE (SSD 6766 and SSD 7628) Operational Noise Management Plan.</p> <p>An Operational Noise Management Plan must be submitted to the Secretary for approval and form part of the OEMP required under condition [SSD 7628 CoC] C3. The report must be prepared by a suitably qualified and experienced person(s) and include:</p> <p>(a) an outline of management actions to be taken to address any potential non-compliances with the limits specified in [SSD 7628] Table 5;</p> <p>(b) a description of contingency measures to be implemented in the event management actions do not reduce noise levels to a compliant level; and</p> <p>(c) identification of additional feasible and reasonable measures to those proposed in the documents specified under condition [SSD 7628 CoC] A2, that would be implemented with the objective of meeting the criteria outlined in the NSW RNP (EPA, 2011), when these measures would be implemented and how their effectiveness would be measured and reported to the Secretary and the EPA.</p>	Section 4.2.8
B84	<p>Prior to construction of the freight village and each warehouse, the Applicant must submit to the Secretary a Noise Assessment for Mechanical Plant and other noisy equipment to demonstrate that plant has been selected to meet the overall operational noise limits specified in SSD 7628 CoC Table 5.</p> <p>The operational noise limits in SSD 7628 CoC Table 5 are cumulative of MPE Stage 1 noise limits.</p>	Section 4.2.8
B85	<p>The Applicant must carry out noise monitoring of mechanical plant and other noisy equipment for a minimum period of one week where valid data is collected following occupation of each warehouse. The monitoring program must be carried out by a suitably qualified and experienced person(s) and a Monitoring Report for Mechanical Plant must be submitted to the Secretary within two months of occupation or each tenancy to verify predicted mechanical plant and equipment noise levels.</p>	Section 4.2.8
B89	Heavy vehicles not permitted to use Moorebank Avenue south of the East Hills Railway corridor	Section 4.2.8
<b>Dangerous Goods</b>		
B112	<p>The Applicant (the operator/occupant of each premises) must store and handle all chemicals, fuels and oils, including Dangerous Goods as defined in the <i>Australian Code for the Transport of Dangerous Goods by Road &amp; Rail</i>, in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids. In the event of an inconsistency between the requirements listed above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	Section 3.10

CoC SSD 7628	Requirement	Document Reference
B113	The Applicant (the operator/occupant of each premises) must ensure compliance with the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management</i> – technical bulletin (EPA, 1997 and that for liquids, a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.	Section 3.10
B114	The quantities of dangerous goods present at any time within the development or transported to and from the development must not exceed the screening threshold quantities in the Department's Hazardous and Offensive Development Guidelines Application Guidelines <i>Applying SEPP 33</i> except Warehouse 7. The storage of dangerous goods and combustible materials in Warehouse 7 must not exceed the quantities listed in Table 8 of the <i>Preliminary Hazard Analysis</i> (document number J1837221019.1) prepared by Riskcon dated 1 October 2022 at all times.	Section 3.10
B114 A	The Applicant must prepare the studies set out under subsections (a) and (b). Storage of dangerous goods in Warehouse 7 must not commence until study recommendations have been considered and, where appropriate, acted upon. The Applicant must submit the studies to the Planning Secretary no later than one month prior to the commencement of the storage of dangerous goods in Warehouse 7, or within such further period as the Planning Secretary may agree.	Section 3.10 & 4 Table 10
B114 A(a)	<u>FIRE SAFETY STUDY</u> A Fire Safety Study for Warehouse 7. The study must cover the relevant aspects of the Department's <i>Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study'</i> and the New South Wales Government's <i>Best Practice Guidelines for Contaminated Water Retention and Treatment Systems</i> . The study must also satisfy the operational requirements of Fire and Rescue NSW, and include documentary evidence that a suitably qualified and experienced person is satisfied that the Applicant constructed Warehouse 7 in accordance with the fire safety systems, and proposed designed assessed in the Fire Safety Study.	Section 3.10 & 4 Table 10
B114 A(b)	<u>FINAL HAZARD ANALYSIS</u> A Final Hazard Analysis for Warehouse 7 with the Department's <i>Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'</i> .	Section 3.10 & 4 Table 10
B114 B	Prior to the storage of dangerous goods in Warehouse 7, the Applicant must develop and implement the plans and systems set out under subsections (a) and (b). The Applicant must submit to the Planning Secretary documentation describing the plans and systems no later than two months prior to the commencement of the storage of dangerous goods in Warehouse 7, or within such further period as the Planning Secretary may agree.	Section 3.10 & 4 Table 10

CoC SSD 7628	Requirement	Document Reference
B114 B (a)	<p><u>EMERGENCY PLAN</u></p> <p>A comprehensive Emergency Plan and detailed emergency procedures for Warehouse 7. This plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be consistent with the Department's <i>Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'</i>.</p>	<p>Section 3.10 &amp; 4</p> <p>Table 10</p> <p>Emergency Response procedures are detailed in <b>Section 3.11</b></p>
B114 B (b)	<p><u>SAFETY MANAGEMENT PLAN</u></p> <p>A document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials for Warehouse 7. The document must clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by the Planning Secretary upon request. The Safety Management System must be consistent with the Department's <i>Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'</i>.</p>	<p>Section 3.10 &amp; 4</p> <p>Table 10</p>
B114 C	<p><u>HAZARD AUDIT</u></p> <p>Twelve months after the commencement of operations of Warehouse 7 and every five years thereafter, or at such intervals as the Planning Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of Warehouse 7 and within one month of each audit submit a report to the Planning Secretary. The audits must be carried out at the Applicant's expense by a qualified person or team, independent of the development, approved by the Planning Secretary prior to commencement of each audit. Hazard Audits must be consistent with the Department's <i>Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit'</i>. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.</p>	<p>Section 3.10 &amp; 4</p> <p>Table 10</p>
B114 D	<p><u>FURTHER REQUIREMENTS</u></p> <p>The Applicant must comply with all reasonable requirements of the Planning Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 114A to 114D inclusive, within such time as the Planning Secretary may agree.</p>	<p>Section 3.10 &amp; 4</p> <p>Table 10</p>
B115	<p><u>Prior to occupation of each premises</u> and in each instance of occupation by a new occupant, a report must be submitted and approved by the Secretary confirming that the premises will be operated so as to comply with the requirements of conditions B112 and B114.</p>	<p>Section 3</p>

CoC SSD 7628	Requirement	Document Reference
B116	<p><u>Six months prior to operation</u>, the Applicant must prepare an <b>Emergency Response Plan</b>, in consultation with FRNSW and NSW Police Force.</p> <p>The Emergency Response Plan must include, but not be limited to:</p> <ul style="list-style-type: none"> <li>(a) protocols and procedures to be followed during emergency situations associated with the operation of the project (including fires and explosions). The protocols and procedures are to take into account the needs of people with a disability or who may experience access problems in emergency situations;</li> <li>(b) details of traffic management measures to be implemented during emergencies, where appropriate, to minimise the potential for escalation of the emergency;</li> <li>(c) design and management measures to address the potential environmental impacts of an emergency, including measures for containment of contaminated fire-fighting water, fuel spills and gaseous combustion products; and</li> <li>(d) details of a training and testing program to ensure that all operational staff are familiar with the Emergency Response Plan</li> </ul>	<p>Section 3.8</p> <p>Section 3.10 &amp; 4</p> <p>Table 10</p>
<b>Waste Management</b>		
B121	Waste to be secured and maintained within designated storage areas	Section 3 & 4.2.7
B122	Lawful disposal of wastes	Section 3 & 4.2.7
B123	Assessment and classification of wastes prior to removal from site	Section 3 & 4.2.7
B124	No receipt of wastes generated from off-site	Section 3 & 4.2.7
B125	Retention of waste sampling and classification data	Section 3 & 4.2.7
B126	Collection of wastes between 7 am and 10 pm Monday to Friday	Section 3 & 4.2.7
<b>Pests, Vermin and Noxious Weed Management</b>		
B127	Inspection of site and management of pests, vermin, and noxious weeds	Section 3 & 4.2.4
<b>Ecologically Sustainable Development</b>		
B142	Warehouse to be designed and operated to meet ESD principles	Section 3.8

CoC SSD 7628	Requirement	Document Reference
<b>Incident Management</b>		
C11 – C12	Notification of incidents	Section 3.8
C13	Preparation of incident reports	Section 3.8
C14	Compliance with directions to address the cause or impact of an incident	Section 3.8
C15	EPA notification to be provided to the Secretary.	Section 3.8
<b>Non-compliance Notification and Reporting</b>		
C16	Non-compliance notification to the DP&E	Section 5.6
C17	Content expectations for non-compliance notification	Section 5.6
<b>Compliance Monitoring and Tracking</b>		
C21	Compliance monitoring and reporting aligned to the Compliance Reporting Post Approval Requirements (DP&E, June 2018)	Section 5.9



Licenses, permits and approvals required for this site are summarised in **Table 4**.

MAINFREIGHT DISTRIBUTION PTY LTD will ensure that any licenses, permits and approvals are obtained. A copy of all licenses, permits and approvals are included in **Attachment 1** of this WOEMP.

**Table 4: Summary of Licenses and permits**

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

### 3.6 Reporting

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

- monitoring 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 company intranet.

### 3.7 Environmental Training

All MAINFREIGHT DISTRIBUTION PTY LTD workers who will be working onsite shall receive site-specific induction training. The induction training will include:

- familiarisation with the requirements of this WOEMP.
- familiarisation with LOGOS's OEMP for MLP Precinct East
- environmental emergency response training; and
- familiarisation with site environmental controls.
- community expectations and complaints management procedure

MAINFREIGHT DISTRIBUTION PTY LTD may combine Work Health and Safety (WHS) and Environmental induction into one. A record of the site induction will be made on the *Site Environmental Induction Register* (see **Attachment 2**).

### 3.8 Emergency Contacts and Response

This WOEMP sets out MAINFREIGHT DISTRIBUTION PTY LTD 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 Operations Manager, EPA, local council, nearby residents, or the community if necessary.

### 3.9 Key Emergency Response Personnel

The Branch Manager will be the first point of contact when an incident or spill occurs. They can be contacted 24 hours a day. Contact details including emergency services are included in **Table 5** below:

**Table 5: Emergency Response Contact Details**

Project Contact Details	
Emergency Services	
Ambulance, Fire or Police	<b>000</b>
Poisons Information	13 11 26
First Aider	
Utilities	
Water	132 203
Electricity	132 090
Gas	131 388
Telephone	131 909
<b>EPA (24-hour pollution line)</b>	131 555
Branch Manager	
Craig Smith	+61 407 945 773

Project Contact Details	
Property Manager	
Martin Wierzbicki	+61 418 854 127
Health and Safety Representative (HSR)	
TBA	TBA

## 3.10 Dangerous Goods/Hazardous Substances & Compliance

### 3.10.1 Identification of Dangerous Goods

The definition for Dangerous Goods (DG) and Hazardous Substances (HS) is as follows:

- **Dangerous Goods (DG):** are substances or articles that pose a risk to people, property, or the environment, due to their chemical or physical properties. They are usually classified with reference to their immediate risk.
- **Hazardous Substance:** are defined in terms of the chronic or acute harm caused to the health of people exposed to the substance as per the Globally Harmonized System of Classification and Labelling of Chemicals.

The Classes of DG are listed in **Table 6**.

**Table 6: Classes of DG**

Class	Description	Class	Description
1	Explosives	5.1	Oxidizing Substances
2.1	Flammable Gases	5.2	Organic Peroxides
2.2	Non-flammable, Nontoxic gases	6.1	Toxic substances
2.3	Toxic Gases	6.2	Infectious Substances
3	Flammable Liquids	7	Radioactive substances
4.1	Flammable Solids	8	Corrosives
4.2	Spontaneously Combustible	9	Miscellaneous dangerous goods
4.3	Dangerous when wet		

MAINFREIGHT DISTRIBUTION PTY LTD store and transport (Container loading) dangerous goods including:

- Flammable Gas 2.1
- Flammable Liquid 3 and
- Oxidizing Agent 5.1.

The storage of these dangerous goods is for various customers and may fluctuate with customer requirements.

**Table 7** lists the DGs approved in SSD 7628 Modification 6.

**Table 7: Classes of Dangerous Goods approved for Warehouse 7**

Class	Dangerous Goods	Packing Group	Pallets	Quantities (kg)
2.1	Flammable Gas (Aerosols)	N/A	1,470	588,000 kg <sup>^</sup> / 147,000 kg *
3	Flammable Liquids (perfumery products)	II & III	2,000	800,000 kg ^
3	Flammable Liquids (alcohol, 40% abv)	III	6,000	2,400,000 kg ^
C1/C2	Combustible liquids	N/A	2,500	1,350,000 kg

NOTE: ^Assumed 400 kg/pallet, \* Based upon 25% of the aerosol being an LPG propellant

### 3.10.2 Dangerous Goods Storage Thresholds

In addition to the requirements of the relevant standards, a Person Conducting a Business or Undertaking (PCBU) must also satisfy several obligations outlined in Chapter 7 of the *Work Health and Safety (WHS) Regulation 2017*. The relevant requirements are dependent on the quantities of DGs stored on site.

The DG quantities and the placard and manifest thresholds have been outlined in **Table 8**. As the DG stores exceed the manifest threshold, the site is classified as a Manifest site.

**Table 8: Manifest and Placard DG quantities**

Class	Dangerous Goods	Packing Group	Quantity (T)	Placard Quantity (L)	Manifest Quantities (L)	Classification
2.1	Flammable Gas (Aerosols)	N/A	165 *	5,000	10,000	Manifest
3	Flammable Liquids	II & III	3,200	250	2,500	Manifest
C1/C2	Combustible liquids	N/A	1,350	10,000	100,000	Manifest

\*Based upon 25% of the aerosol being an LPG propellant

MAINFREIGHT DISTRIBUTION PTY LTD recognises that where DGs are stored in volumes greater than threshold quantities, SafeWork NSW<sup>1</sup> manifest quantity requirements apply. The threshold quantities for the DGs stored at the warehouse are summarised in **Table 9**. The location of the DG storage in the warehouse is provided in **Figure 6**.

**Table 9: Manifest and Placard DG quantities**

Class	Dangerous Goods	Packing Group	Threshold quantities
2.1	Flammable Gas (Aerosols) (excluding LP gas), Class 2.2 or compressed oxygen if	N/A	(a) each is in one or more containers in an aggregate capacity not exceeding 50 L, and (b) the DG as a whole form part of a welding set or are used or intended to be used with a portable flame torch. Compressed oxygen or air that is used or intended to be used for medical
3	Flammable Liquids	II & III	250 L
C1	Combustible liquids	N/A	1000 L
	Any dangerous goods other than those stated above		100 kg or L

<sup>1</sup> Chapter 7 of the Work Health and Safety (WHS) Regulation 2017

Note that Chapter 7 also details (<https://legislation.nsw.gov.au/view/html/inforce/current/sl-2017-0404#ch.7>):

- Division 2: Obligations relating to data sheets and other matters
- Division 3: Provision of resister and manifest
- Division 4: Placards – warning and requirement display
- Division 5: Obligations for the control of risk
- Division 6: Health monitoring
- Division 7: Inductions, training and supervision
- Division 8: Prohibition, authorisation and restricted use

Storage in 7A, only 7B.

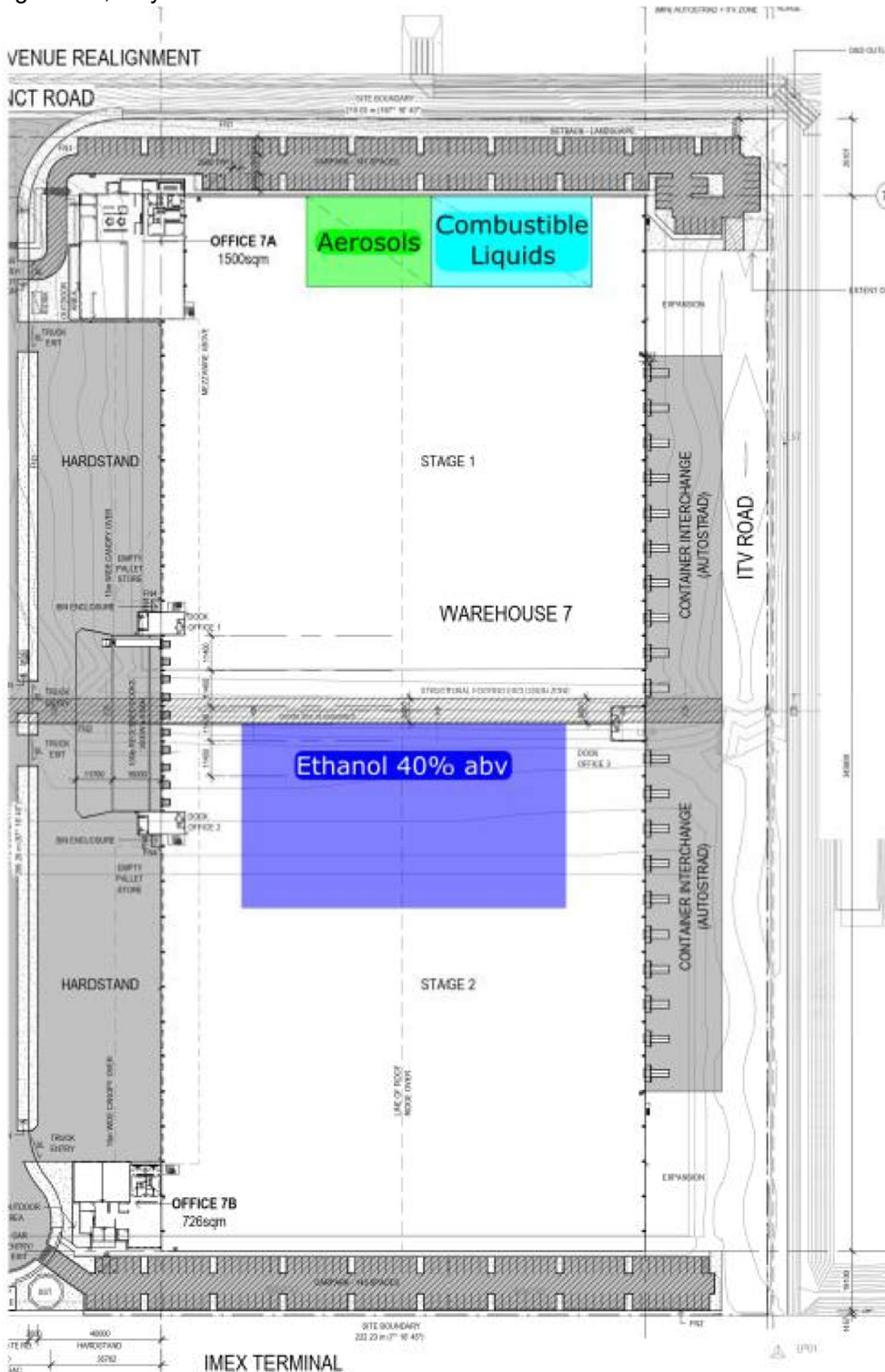


Figure 6: Location of storage for DG

### 3.10.3 Dangerous Goods Storage Compliance

Table 10 summarises the CoC that MAINFREIGHT DISTRIBUTION PTY LTD need to comply with.

**Table 10: CoC applicable to DGs at Warehouse 7**

CoC SSD 7628	Requirement	Comment
B112	The Applicant (the operator/occupant of each premises) must store and handle all chemicals, fuels and oils, including Dangerous Goods as defined in the <i>Australian Code for the Transport of Dangerous Goods by Road &amp; Rail</i> , in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids. In the event of an inconsistency between the requirements listed above, the most stringent requirement shall prevail to the extent of the inconsistency.	See the section on the Identification of Quantities of Dangerous Goods
B113	The Applicant (the operator/occupant of each premises) must ensure compliance with the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management</i> – technical bulletin (EPA, 1997 and that for liquids, a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.	See the section on the Identification of Quantities of Dangerous Goods
B114	The quantities of dangerous goods present at any time within the development or transported to and from the development must not exceed the screening threshold quantities in the Department's Hazardous and Offensive Development Guidelines Application Guidelines <i>Applying SEPP 33</i> except Warehouse 7. The storage of dangerous goods and combustible materials in Warehouse 7 must not exceed the quantities listed in Table 8 of the <i>Preliminary Hazard Analysis</i> (document number J1837221019.1) prepared by Riskcon dated 1 October 2022 at all times.	See the section on the Identification of Quantities of Dangerous Goods See Table 7 for quantities
B114A	The Applicant must prepare the studies set out under subsections (a) and (b)..... <b>(a) Fire Safety Study</b> <b>(b) Final Hazard Analysis</b>	Still to be prepared
B114B	Prior to the <u>storage of dangerous goods in Warehouse 7</u> , the Applicant must develop and implement the plans and systems set out under subsections (a) and (b)..... <b>(a) Emergency Plan</b> <b>(b) Safety Management Plan</b>	Still to be prepared Emergency Response procedures are detailed in <b>Section 3.11</b>
B114C	Hazard audit	Still to be undertaken
B114D	Further Requirements The Applicant must comply with all reasonable requirements of the Planning Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 114A to 114D inclusive, within such time as the Planning Secretary may agree.	The WOEMP will be updated following the completion of the above studies to ensure that all risks, measures etc are included

MAINFREIGHT DISTRIBUTION PTY LTD will ensure all goods are identified, quantified, stored and handled as outlined in the sections below.

### 3.10.4 Identification of Quantities of Dangerous Goods

MAINFREIGHT DISTRIBUTION PTY LTD will ensure the following information is collected, reviewed, and recorded by MAINFREIGHT DISTRIBUTION PTY LTD in relation to Dangerous goods stored onsite and in transport movements:



- a rolling manifest of dangerous goods intending to be delivered to the warehouse, stored in the warehouse, and being dispatched from the warehouse and their respective quantities.
- dangerous goods classification for each material, including subsidiary class(es).
- the mode of storage used (that is, bulk or packages/containers) and the maximum quantity stored or held on the premises at any one time.
- the distance of the stored material from the site boundary for any of the materials in dangerous goods classes 1.1, 2.1 and 3; and
- an up-to-date register of Safety Data Sheets (SDS) for all materials in storage (see attachment 2)

Furthermore, the following information will be considered by MAINFREIGHT DISTRIBUTION PTY LTD.

- LPG, as defined in *AS1596 — LP Gas Storage and Handling, though classified as a flammable gas (2.1)*, is treated separately for screening purposes, and should not be grouped with the other class 2.1 flammable gases.
- If combustible liquids of class C1 are present on site and are stored in a separate bund or within a storage area where there are no flammable materials stored, they are not considered to be potentially hazardous. If, however, they are stored with other flammable liquids, that is, class 3PGI, II or III, then they are to be treated as class 3PGIII, because under these circumstances they may contribute fuel to a fire.
- If liquids are stored onsite Ensure compliance with the Environment Protection Manual for Authorised Officers: Bunding and Spill Management — technical bulletin (EPA, 1997 and that for liquids, a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.
- All industrial equipment that contains quantities of dangerous goods will be included in the quantification of dangerous goods present on the warehouse premises. Any materials of this nature will be part of the overall quantities of dangerous goods being stored on site.
- The weekly review of total dangerous goods quantities held on the warehouse premises will be conducted, which provides visibility of held quantities relative to threshold values.
  - When compared to foreseeable receipt and dispatch schedules for dangerous goods into and from the warehouse premises the potential for any exceedance of screening threshold values can be determined and will enable the re-routing or dispatch of any material likely to create such an exceedance.
- Hazardous materials quantities will be grouped and totaled by class (ADG class), activity (goods transfer through warehouse or warehouse plant and equipment) and location (within warehouse racks, bunds, designated storage areas, internally or externally).
- Where several hazardous materials of the same class are kept on site in the same general location, the quantities will be totaled by class and activity (that is, total all quantities of each class stored in bulk then separately total the quantities of each class stored in packages/containers).
- If dangerous goods of a given class but varying packing groups are stored in the same general area, assume the total of that class is present as the most hazardous packing group (for example, if 3PGI and 3PGII are present, add these together and assume the equivalent total is of 3PGI).

The distance of the material group to the nearest boundary is recorded. The distance is to be measured from those materials in the group located closest to the boundary.



### 3.10.5 Dangerous Goods Training and Induction

**Section 3.7** details the training required by all MAINFREIGHT DISTRIBUTION PTY LTD workers who will be working onsite.

In addition to this, as detailed in Chapter 7, Division 7 [Induction, information, training and supervision] of the Work Health and Safety (WHS) Regulation 2017, MAINFREIGHT DISTRIBUTION PTY LTD has the following Duty to Provide Supervision to a worker. This is necessary to protect the worker from risks to the worker's health and safety arising from the work if, at the workplace, the worker—

- (a) uses, handles, generates or stores a hazardous chemical, or
- (b) operates, tests, maintains, repairs or decommissions a storage or handling system for a hazardous chemical, or
- (c) is likely to be exposed to a hazardous chemical.

MAINFREIGHT DISTRIBUTION PTY LTD will ensure that the supervision of the worker is suitable and adequate having regard to:

- (a) the nature of the risks associated with the hazardous chemical, and
- (b) the information, training and instruction required under clause 39 (of the .

Clause 39 details the **Provision of information, training and instruction**:

- 1) This clause applies for the purposes of Section 19 of the *Work Health and Safety Act* to a person conducting a business or undertaking.
- 2) The person must ensure that information, training and instruction provided to a worker is suitable and adequate having regard to:
  - a) the nature of the work carried out by the worker, and
  - b) the nature of the risks associated with the work at the time the information, training or instruction is provided, and
  - c) the control measures implemented.

There is a maximum penalty in the case of an individual—70 penalty units, or in the case of a body corporate—345 penalty units if this duty is not carried out.

## 3.11 Emergency Response Procedures:

### 3.11.1 Fire Emergency

Steps to manage a fire emergency:

- Call '000' as soon as possible.
- If safe to do so leave the work area. If it is 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 Operations Manager and wait for instructions.

### 3.11.2 Gas Leak Emergency

Steps to manage a gas leakage emergency:

- Call the Operations Manager immediately, if deemed necessary call the Fire Brigade on '000'
- Operations Manager to immediately arrange to turn off the gas supply.
- Operations Manager 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.

### 3.11.3 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 Operations Manager.
- Remove spilt material and place in sealed container for disposal (if possible); and
- Operations Manager to record incidents.
- as suggested on Safety Data Sheet (SDS).

### 3.11.4 Emergency Testing

Appropriate testing, alarm systems and work, health and safety (WHS) precautions would be implemented for the safety of personnel and infrastructure.

An Emergency Drill should be carried out at least annually and in conjunction with the MPE2 ERP.

**NOTE:** In conjunction with the above please refer to the MIP East Precinct Emergency Response Plan (ERP)

## 4 IMPLEMENTATION

### 4.1 Environmental Risks

The risk to the environment has been considered when devising this management plan. The outcomes of this process have provided our business with mitigation strategies to control the risks identified.

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

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

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

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

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

To be effective the Risk Register has been developed in consultation with staff from all relevant operational areas.

- The ranking (or determination of significance) for each risk is based on the following:
  - The Hazard (that which may cause harm), which may be controlled by elimination or substitution
  - The Pathway (how harm may occur), which may be controlled by engineering or administrative controls
  - The Impact (the nature of the harm that may occur), which may be controlled by measures such as spill control equipment and emergency response procedures.

This analysis directs the correct application of the hierarchy of controls. Assessed risks were assigned a risk control priority in accordance with **Table 11**.

**Table 11: Risk rating and control priority**

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

**Table 12: Environmental Risk (Aspects and Impacts) Assessment**

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

## 4.2 Environmental Management Activities and Control Measures

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

### 4.2.1 Air Quality

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Emissions of air pollutants from motor vehicles &amp; plant</b>		
Regular maintenance of machinery and equipment (forklifts etc). Workers instructed not to leave machinery idling when not in use.	Operations Manager	Ongoing
<b>Potential Impact: Dust generated from movement of plant</b>		
If significant dust is generated, from site operations or work areas the work area/stock and or equipment will be watered down or cleaned	Operations Manager	Ongoing

#### 4.2.2 Erosion & Sediment Control

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Site erosion and sediment laden water leaving the site</b>		
N/A	N/A	N/A

#### 4.2.3 Water Quality

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Contamination of water due to chemicals, fuels or wastes</b>		
Safety Data Sheet (SDS) of hazardous substance will be referred to should a spill occur.	Operations Manager	Ongoing
The site will hold a spill kit to contain any site spills.	Operations Manager	Ongoing
Any hazardous substances on site will be recorded in the Hazardous Substances and Safety Data Sheet Registers.	Operations Manager	Ongoing

#### 4.2.4 Flora & Fauna

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Spread of weeds</b>		
If Weeds are identified notification to LOGOS will be undertaken and a contractor will be engaged to remove from the site to prevent spread.	Operations Manager	Ongoing
Onsite lawns and garden areas will be maintained regularly, and refuse disposed of composted by a LOGOS contractor.	Operations Manager	Ongoing

#### 4.2.5 Community Relations

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Public amenity</b>		
Any Noise or community complaints received by MAINFREIGHT DISTRIBUTION PTY LTD will be passed on to LOGOS.	Branch Manager	If required

#### 4.2.6 Traffic

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Parking and access to site</b>		
A Traffic Management Plan for the site has been developed to manage all vehicle movements onsite	Branch Manager	Ongoing
The Traffic Management Plan will be upheld onsite.	Operations Manager	Ongoing

#### 4.2.7 Waste Management

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Unacceptable disposal of site waste</b>		
All material waste disposed of will be recorded in the Waste Records by the nominated waste contractor.	Operations Manager	Ongoing
All waste removed from site will be disposed of in accordance with the Protection of the Environment Operations Act 1997	Operations Manager	Ongoing
Appropriate space will be provided for the temporary storage of garbage, recyclable, and compostable waste to ensure separation of waste products.	Operations Manager	Ongoing
On-going checks will be carried out to ensure correct separation and re-use of recyclable materials is being maintained.	Operations Manager	Ongoing

#### 4.2.8 Noise

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Unacceptable noise levels and vibrations</b>		
Work equipment will be maintained in good working order to comply with EPA guidelines. Where required, noise suppressors will be installed.	Operations Manager	When required
Work will take place during nominated business hours only.	Branch Manager	Ongoing
Operations would be undertaken consistent with the recommendations and assumptions detailed in the MPE Stage 2 SSD-7628 B84 assessment.	Branch Manager	Ongoing
Noise Assessment for Mechanical Plant and other noisy equipment Monitoring is required for minimum of 1 week following occupation of the Warehouse. Report to be submitted to the Secretary within 2 months of occupancy to verify predicted noise levels in the MPE Stage 2 SSD-7628 B84 assessment.	Branch Manager	When required

#### 4.2.9 Dangerous Goods and Hazardous

Control Measure	Responsibility	Timing / Frequency
<b>Potential Impact: Spills and uses of Dangerous goods and hazardous substances leading to potential contamination of air, land and water if loss of containment occurs.</b>		
All Dangerous goods/ Haz. substances are to be identified, quantified, stored, handled and disposed of in accordance with this WOEMP, LOGOS and EPA requirements.	Operations Manager	Ongoing
All hazardous waste removed from site will be disposed of in accordance with the <i>Protection of the Environment Operations Act 1997</i> (POEO ACT 1997).	Branch Manager	When required
Ensure compliance with the Environment Protection Manual for Authorised Officers: Bunding and Spill Management — technical bulletin (EPA, 1997 and that if liquids are to be stored onsite, a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.	Operations Manager	When required
Safety Data Sheet (SDS) of hazardous substance will be referred to if spills occur.	Operations Manager	When required
All hazardous substances will be recorded in the Hazardous Substances Register and the SDS recorded in the Safety Data Sheets (SDS) Register.	Operations Manager	Ongoing
Dangerous goods storage within Warehouse 7, will be quantified and a screening test would be undertaken in accordance with SEPP 33.	Operations Manager	Ongoing
Handling of dangerous goods including unpacking from containers and storage within the warehouse this shall be undertaken in accordance with the Storage and <i>Handling of Dangerous Goods Code of Practice</i> (WorkCover NSW 2005).	Operations Manager	Ongoing
Should it be required an Operational Hazard and Risk Management Plan would be developed for the Amended operations and area and be implemented as part of the OEMP for the Amended Proposal. This plan would be reviewed regularly and updated should goods entering the site change. As a minimum, the plan would adopt the requirements of the <i>Code of Practice for Storage and Handling of Dangerous Goods</i> (WorkCover NSW 2005).	Operations Manager	If required



## 5 MONITOR AND REVIEW

### 5.1 Environmental Monitoring

MAINFREIGHT DISTRIBUTION PTY LTD will monitor the environmental controls listed in Section 3.2 through regular site environmental inspections.

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

### 5.2 Environmental Auditing

Planned and documented audits aimed at evaluating the environmental conformance of our Moorebank site will be carried out by MAINFREIGHT DISTRIBUTION PTY LTD. Any deficiencies identified during the audits shall be documented and actioned in accordance with the MAINFREIGHT DISTRIBUTION PTY LTD's corrective action process (see Section 4.5). Furthermore, the audit program will determine whether the WOEMP has been properly implemented and maintained onsite. The audits to be carried out and their frequency are listed in **Table 13**:

**Table 13: Schedule of Audits**

Audit Type	Frequency	Record	Auditor
Environmental Management Plan	Annual	Audit Report	Branch Manager
Site Environmental Inspection	Monthly	Site Environmental Inspection Checklist	Operations Manager

### 5.3 Communication

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

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

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

## 5.4 Environmental Incidents

Should an environmental incident occur, the Branch Manager or delegate will notify LOGOS, and the incident will be recorded and responded to. The Branch Manager will follow up on any corrective actions and reporting as required.

## 5.5 Complaints

Community groups, clients, 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, fax/letter, telephone complaint, newspaper/magazine report and verbal protest.

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

## 5.6 Non-Conformance & Corrective Action

A non-conformance occurs when a procedure or environmental control is not followed or does not perform as required by this WOEMP. MAINFREIGHT DISTRIBUTION PTY LTD will monitor non-conformances to the WOEMP and initiate corrective and preventive actions/s where required. All non-conformances will be recorded on a *Non-Conformance Report Form* (see Attachment 2).

MAINFREIGHT DISTRIBUTION PTY LTD will undertake corrective action/s in when incidents have had an environmental impact. Procedures for identifying corrective action include:

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

## 5.7 Environmental Management Plan Review

This WOEMP will be reviewed by the Branch Manager as required to ensure its continuing suitability and to ensure it conforms to the WOEMP's environmental objectives and legal requirements.

Reviews will be undertaken annually) or because of any of the following:

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

#### Changes to the Environmental Plan

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

### 5.8 Environmental Management Plan Review Scope

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

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

### 5.9 Environmental Management Compliance Report

MAINFREIGHT DISTRIBUTION PTY LTD will prepare an '*Environmental Management Compliance Report*' which will detail how we have complied with the

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

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

### 5.10 Environmental Management Records

Appropriate records that demonstrate the environmental obligations will be maintained. This includes, but is not limited to the following:

- Complaints register
- Incident reports and register
- SDS Register

- Licenses and permits register (if applicable)
- Waste tracking register / waste transfer receipts (if applicable)
- Training records
- Monitoring data

Note: The records must be legible and readily interpretable by a third party.

## 5.11 Review and Improvement

This WOEMP will be reviewed formally on an annual basis by the Warehouse Manager in consultation with the LOGOS Estate Management, and other stakeholders as required.

Review may also take place immediately after any significant incident or change to the activities, products or services or material changes in the operating conditions.

This WOEMP is a 'live' document with the ability to change as the operational situation changes. These changes can be in the form of recommendations from MAINFREIGHT DISTRIBUTION PTY LTD Management, external auditor, LOGOS / EMC or site employees.

This WOEMP will be reviewed formally on an annual basis in consultation with stakeholders as required.

Review may also take place immediately after any significant incident or change to the activities, products or services or material changes in the operating conditions.

## 6 ATTACHMENTS: ENVIRONMENTAL DOCUMENTATION

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



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## SITE ENVIRONMENTAL INDUCTION REGISTER

Record of persons receiving environmental induction for this site

Warehouse 7:

Address:

Name of Inductor

Telephone

Topics Covered

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

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

**Trainer Sign off:**

**Signed:**

**Date:**



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## SITE ENVIRONMENTAL INSPECTION CHECKLIST

### PROJECT DETAILS

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

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





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ENVIRONMENTAL ISSUES				
Noise Management	Yes	No	N/A	Comments
Are procedures in place to minimise noise to workers and surrounding noise sensitive areas.				
Does all plant and equipment comply with the relevant codes, warehouse operational environmental management plan, guidelines and standards for noise control?				

Company Representative Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date \_\_\_\_\_



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## ENVIRONMENTAL COMPLAINT FORM

Project Name

EC Number:

Address:

Date:

EC Issued to:

EC Issued by

### ENVIRONMENTAL COMPLAINT DETAILS

#### Environmental Incident

- |                                    |  |
|------------------------------------|--|
| <input type="checkbox"/> Pollution | <input type="checkbox"/> Potential pollution |
| <input type="checkbox"/> Other:    |  |

#### DETAILS OF COMPLAINT

Name:	Address:
Position:	Contact No

#### NATURE OF COMPLAINT

- |                                      |  |
|--------------------------------------|--|
| <input type="checkbox"/> Dust        | <input type="checkbox"/> Vibration                     |
| <input type="checkbox"/> Noise       | <input type="checkbox"/> Soil contamination            |
| <input type="checkbox"/> Water       | <input type="checkbox"/> Plant/machinery               |
| <input type="checkbox"/> Pollution   | <input type="checkbox"/> Waste                         |
| <input type="checkbox"/> Flora/fauna | <input type="checkbox"/> Erosion and sediment controls |
| <input type="checkbox"/> Other:      |  |

#### INCIDENT DETAILS

Location of incident:	Time:
	Date:

Description:

Conditions of site when complaint occurred:

Corrective or preventive action to be taken to fix the complaint	Responsible person	Date to be completed by
--	--------------------	-------------------------

#### SIGN OFF

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

Name:	Date:
-------	-------

Signature:

Branch Manager agrees corrective or preventative is complete

Name:	Date:
-------	-------

Signature:



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## NON-CONFORMANCE REPORT FORM

Project Name

NCR Number:

Address:

Date:

NCR Issued to:

NCR Issued by

### NON-CONFORMANCE DETAILS

#### Area of Non-Conformance

- |   |   |
|---|---|
| <ul style="list-style-type: none"><li>• Site Establishment</li><li>• Works outlined in contract</li><li>• Supplier</li><li>• Customer complaint</li></ul> | <ul style="list-style-type: none"><li>• Work Health and Safety</li><li>• Environmental Management</li><li>• Quality Management</li><li>• Other:</li></ul> |
|---|---|

#### Description of Non-Conformance

#### Outline the evidence obtained for Non-Conformance

Corrective or preventive action to be taken to fix the Non-Conformance	Responsible person	Date to be completed by

#### Sign Off

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

Name:		Date:	
Signature:			
MAINFREIGHT DISTRIBUTION PTY LTD agrees corrective or preventative is complete			
Name:		Date:	
Signature:			



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## HAZARDOUS SUBSTANCES REGISTER

Product Name	Location where Product is Used	Quantity	Clearly Labeled	SDS on Site		Action / Comments
			Yes / No	Yes / No	Date	

An SDS is a Safety Data Sheet – these are available from the substance manufacturer or the point of purchase. SDS must be on site together with the hazardous substance. Action / Comments - note any particular safety controls required e.g. use, transport, PPE, first aid, storage, spill control and whether each substance is classified as hazardous (according to NOHSC) or dangerous goods for transportation (according to ADG code).



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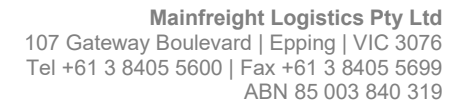
## SAFETY DATA SHEET (SDS) REGISTER

SAFETY DATA SHEET REGISTER					
SDS Number	Date of Issue	Worker	Description	Date Reviewed*	Signed

\*Check SDS is current before starting each project.

SDS must not be more than five years old from date of issued date.

Refer to: **Safe Work Australia Code of Practice - Preparation of Safety Data Sheets for Hazardous Chemicals**

[illegible]

## Environmental Policy



### **ENVIRONMENT PROTECTION POLICY**

The Environment Protection Policy of Mainfreight is a commitment to achieve ongoing development of our business operations to maximise environmental integrity for team members, property, the community, and for future generations.

The Mainfreight Australia Group and each team member, will achieve this responsibility by:

- Complying with Environmental Legislation and relevant Codes of Practice.
- Taking a pro-active approach, to be in advance of, and work in co-operation with Government Authorities to ensure statutory requirements are addressed.
- Evaluating any environmental risks that may arise from existing conditions or changes to our operations.
- Carrying out an audit function, on a regular basis, to monitor and act on reports to ensure that environmental standards are met.
- Developing and reviewing management systems and procedures to align with changing environmental requirements.
- Educating team members and contractors in our environmental objectives.
- Acting with initiative in reducing waste and promoting environmentally sustainable processes and products.