LOGOS

Operational Environmental Management Plan

Moorebank Intermodal Precinct- West Precinct Stage 2

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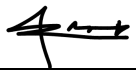
Moorebank Intermodal Precinct – West Precinct Stage 2

SSD 7709

Operational Environmental Management Plan

Author	Zainab Ahmed	
Checker	Megan Kovelis	
Approver	Megan Kovelis	
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Author Details

Author Details	Qualifications and Experience
Zainab Ahmed	BSc, MSc 2 years of experience in environmental planning, assessment and management.
Megan Kovelis	BEnvSc (Hons1), GradCert EnvPl 18 years of experience in environmental planning, assessment and management.
Rob Salisbury	BSc, DipEnvSci, MSc Rob has 30+ years as an environmental scientist and project manager and director, in the water, transport, energy, communications, industrial and other sectors, both in Australia and internationally.

Revisions

Revision	Date	Description	Prepared by	Approved by
1	14/10/2022	Draft for client	N. Yousefi A. Wiltshire	R. Salisbury
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5	07/06/2023	Updated following Woolworths review	R. Salisbury	R. Salisbury
6	12/03/2024	Updated to include N1 and N2 tenant details and address DCCEEW comments	Z Ahmed	M. Kovelis

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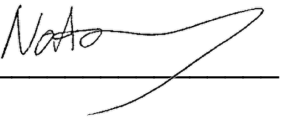
Declaration of Accuracy – LOGOS MLP Development Management PTY LTD (as joint approval holder)

This declaration pertains to the Operational Environmental Management Plan (OEMP) for the Moorebank Logistic Park- West Precinct Stage 2 (EPBC(2011) 6086).

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed 

Full name (please print) Position (please print)
Natalie Allen

Organisation:

LOGOS MLP Development Management PTY LTD (ACN: 649 469 778)

Date. 18/03/2024

Declaration of Accuracy – Qube Holdings Limited (as joint approval holder)

This declaration pertains to the Operational Environmental Management Plan (OEMP) for the Moorebank Logistic Park- West Precinct Stage 2 (EPBC(2011) 6086).

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

_____

Full name (please print) Position (please print)

Simon Barney

Organisation:

Qube Holdings Limited (ACN: 149 723 053)

Date. 06 March 2024

Acronyms and Definitions

Acronym / Term	Meaning
CCC	Community Consultative Committee
CCS	Community Communication Strategy
CER	Community Engagement Representative
CoC	Conditions of Consent
DCCEEW	Department of Climate Change, Energy, the Environment and Water (formerly DotEE)
DPE	Department of Planning and Environment (formerly the Department of Planning, Industry and Environment)
DPE E&H	DPE Environment and Heritage (formerly OEH)
DPHI	NSW Department of Planning, Housing and Infrastructure (formerly the Department of Planning and Environment)
DotEE	Department of the Environment and Energy (now DCCEEW)
ECMs	Environmental Control Maps
EMS	Environmental Management System
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EPL	Environmental Protection Licence
FCMM	Final Compilation of Management Measures
GFA	Gross floor area
HSE	Health, Safety and Environment
ICAM	Incident Cause Analysis Method
IMT	Intermodal Terminal
IPC	Independent Planning Commission
LVMP	Landscape Vegetation Management Plan
MIP	Moorebank Intermodal Precinct
MOD 1	Modification 1 to SSD 7709, granted by the IPC 24 December 2020
MOD 2	Modification 1 to SSD 7709, granted by the IPC 30 September 2021
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
MPW Concept Approval	MPW Concept Approval (SSD 5066), granted by DPE on 29 September 2014 for the development of an intermodal terminal facility including a rail link connecting the site to the Southern Sydney Freight Line, an intermodal terminal, warehousing and distribution facilities and a freight village.
MPW3 POEMP	MPW Stage 3 Precinct Operational Environmental Management Plan
NCR	Non-Compliance Report
NRS	National Relay Service
OAQMP	Operational Air Quality Management Plan
OEH	Office of Environment and Heritage (now DPE (E&H))
OEMP	Operational Environmental Management Plan

Acronym / Term	Meaning
OFFMP	Operational Flora and Fauna Management Plan
ONMP	Operational Noise Management Plan
OTAMP	Operational Traffic and Access Management Plan
OSD	On-site detention
PFOA	Perfluorooctane sulfonic acid
PFOS	Perfluorooctanoic acid
POEO Act	Environment and Operations Act 1997
PPE	Personal Protective Equipment
RCMM	Revised Compilation of Mitigation Measures
REMM	Revised Environmental Management Measures
RMMM	Risk Mitigation and Monitoring Measures
RtS	Response to Submissions
SIMTA	Sydney Intermodal Terminal Alliance
SIOMP	Stormwater Infrastructure Operation and Maintenance Plan
SQMP	Stormwater Quality Monitoring Program
SSD	State Significant Development
SSFL	Southern Sydney Freight Line
TEUs	Twenty-foot Equivalent Units
UDLP	Urban Design and Landscape Plan
WHSMS	Work Health and Safety Management System
WSUD	Water Sensitive Urban Design

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1. Introduction

1.1. Background

The Moorebank Intermodal Precinct (MIP) is an integral component of the freight, ports and transport strategies of both the NSW and Commonwealth governments located approximately 27 kilometres (km) south-west of the Sydney Central Business District and 26km west of Port Botany within the Liverpool Local Government Area (Figure 1-1).

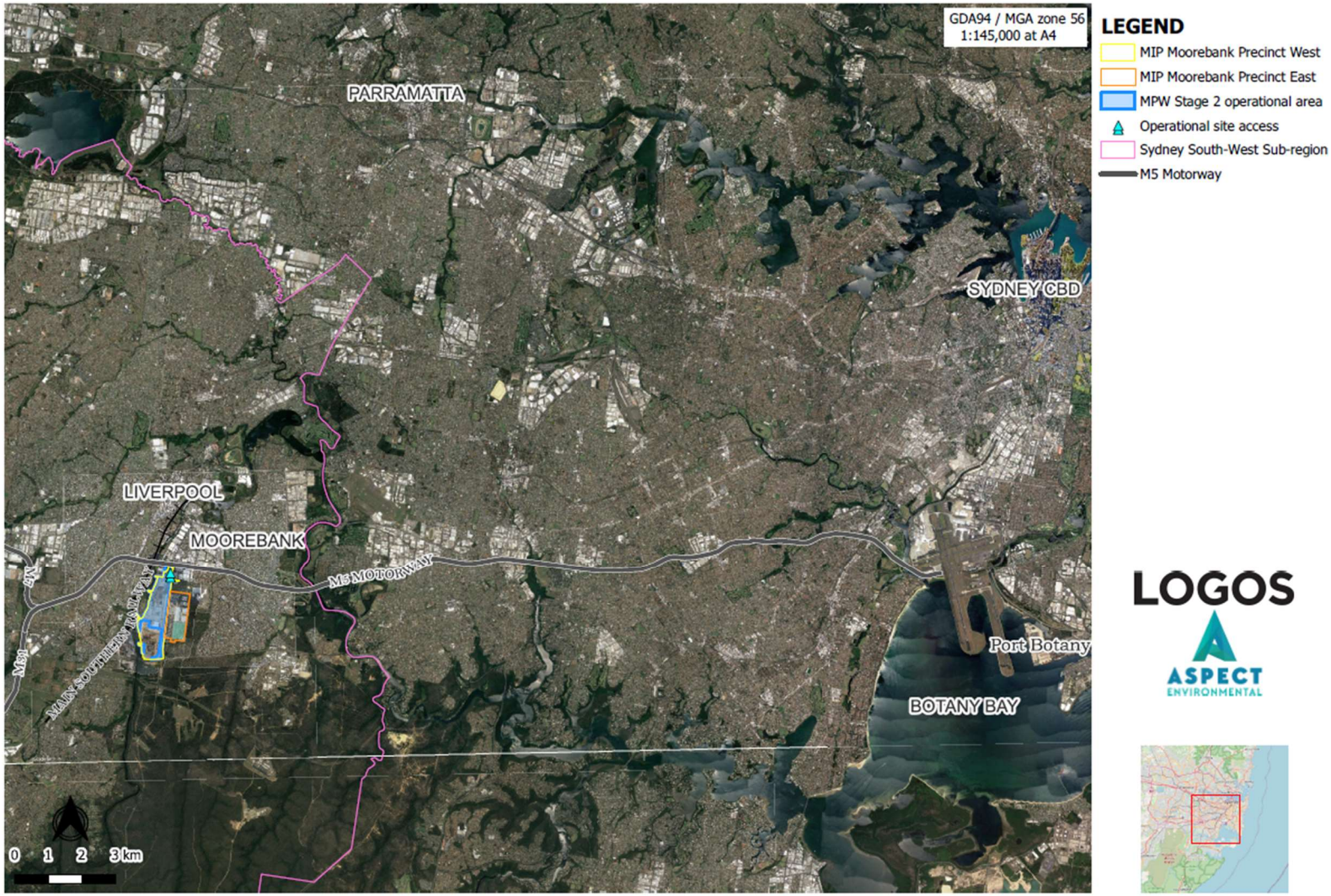
The MIP aims to streamline the freight logistics supply chain from port to store, deliver savings to businesses and consumers, and help service the rapidly growing demand for imported goods in south-west Sydney. On completion, MIP will move 1.55 million shipping containers annually by rail instead of road. It will also feature Australia's largest purpose-built warehouse and distribution precinct serviced by the latest automated technology which will see driverless shuttle carriers collect and transport containers around the precinct to be processed, unpacked and stored on site prior to distribution.

The MIP is divided into the Moorebank Precinct East (MPE) and Moorebank Precinct West (MPW) developments.

The approval for the construction and operation of Stage 2 of the MPW development (State Significant Development (SSD) 7709), which comprises the second stage of development under the MPW Concept Approval (SSD 5066) was received in November 2019.

The MPW Stage 2 development (the Development) involves the construction and operation of a multi-purpose Intermodal (freight) Terminal facility, rail link connection, warehousing, freight village, and upgrades to the Moorebank Avenue and Anzac Road intersection and the subdivision of site including ancillary works. Details on the key components of the Development are included in Schedule 1 of the Development Consent and Section 2 of this plan.

Figure 1-1 MIP location



1.2. Purpose

This Operational Environmental Management Plan (OEMP) is the overarching guide for the operational environmental management of the Development and has been prepared in accordance with Environmental Management Plan Guideline – Guideline for infrastructure Projects (DPIE, 2020) to address:

- The SSD 7709 Consolidated Consent
- Final Compilation of Management Measures (FCMMs) (2 November 2018) included in Appendix 2 of the SSD 7709 Consolidated Consent
- EPBC 2011/6086 Approval
- Environment Protection Licence (EPL) No. 21361.

This OEMP has been prepared specifically to address requirements of Condition of Consent (CoC) C1, C5 and C6 of SSD 7709 Consolidated Consent, and Conditions 4-13 of the EPBC 2011/6086 Approval, which require the preparation of an OEMP, to the satisfaction of the Planning Secretary and the Federal Minister for the Environment (or delegate) prior to commencement of operation.

This OEMP identifies the environmental management measures to be applied to operations across the Development, as described in Section 2, to manage environmental risk.

1.3. Objectives

The objectives of this OEMP are:

- Identify and implement relevant environmental legal and other regulatory requirements applicable to the operation of the MPW Stage 2 Development.
- Identify the environmental activities and impacts associated with operation of the MPW Stage 2 and provide management measures to minimise and manage impacts on the environment and community.
- Establish and define environmental roles and responsibilities.
- Assign responsibility for the implementation, management and review process of the OEMP.
- Provide a consistent and uniform approach to site environmental management such that the required standards for environmental protection are attained and maintained for the duration of the operation of the MPW Stage 2 Development.
- Provide all operational personnel with sufficient information to undertake their activities in accordance with legal and other relevant environmental requirements.
- Provide a framework for training, development and support (systems, procedures and documentation) necessary to undertake operations.

All LOGOS employees, warehouse tenants, sub-contractors and visitors are required to comply with the requirements of this OEMP at all times.

1.4. Consultation

The following OEMP sub-plans have been prepared in accordance with CoC C6(c):

- Operational Traffic and Access Management Plan (OTAMP) (CoC B118)
- Stormwater Infrastructure Operation and Maintenance Plan (SIOMP) (CoC B36)
- Stormwater Quality Monitoring Program (SQMP) (CoC B38)
- Landscape Vegetation Management Plan (LVMP) (CoC B32)
- Operational Noise Management Plan (ONMP) (CoC B136)
- Operational Flora and Fauna Management Plan (OFFMP) (CoC B160).

The Operational Traffic and Access Management Plan (OTAMP) (CoC B118), Stormwater Quality Monitoring Program (SQMP) (CoC B38) and Operational Flora and Fauna Management Plan (OFFMP) (CoC B160) require consultation with relevant stakeholders during their preparation. A summary of stakeholder consultation is provided in Table 1-1.Further detail of stakeholder consultation is provided in the relevant appendix within each sub-plan.

Table 1-1 Consultation summary

Sub-plan	Stakeholder	Outcome
OTAMP	Liverpool City Council	Comments received and addressed in OTAMP. Consultation closed-out.
	TfNSW	Comments received and addressed in OTAMP. Consultation closed-out.
SQMP	Liverpool City Council	Council advised they had no comments. Consultation closed-out.
	EPA	EPA advised they had no comments. Consultation closed-out.
OFFMP	NSW Environment and Heritage	Comments received and addressed in OFFMP. Consultation closed-out.

1.5. Proposed Progressive Application of the OEMP

This OEMP and sub-plans are applicable to the MPW Stage 2 Development. Operational areas will come online progressively as warehouses and the terminal facility are constructed, commissioned, and tenanted. This OEMP and sub-plans will be applied to those operational areas following submission to and approval by the Secretary and the DCCEEW of any updated plans, if required.

As areas become operational, any adjacent construction areas will continue to be managed in accordance with the relevant CEMP and sub-plans, while operational areas will be managed in accordance with this OEMP and sub-plans.

Until the entire Development is operational, all construction areas will be appropriately identified and demarcated to enable effective management of the interface between any construction areas and operations.

1.5.1. Triggers

The DPHI Secretary will be notified two weeks prior to commencement of operation of each new warehouse and the terminal facility, as required by CoC A46. The notification will include updated figures detailing the new areas of operation which will fall under the remit of the OEMP as well as the reduced construction areas.

Following notification, this OEMP and each sub-plan will be updated with the new operational site layout, while the CEMP and applicable sub-plans will be revised to show the reduced area of construction.

1.5.2. Distribution and availability

The most recent approved version of this OEMP and other nominated documents and records will be made publicly available on the Development's website, a minimum of 48 hours prior to the operations commencing in accordance with CoC C21.

In accordance with Condition 27 of the EPBC 2011/6086 approval, each management plan must be published on the Development's website within one month of being approved or being submitted.

1.5.3. Submission, review and update

This OEMP and associated sub-plans will be submitted to DPHI for approval (as required) prior to the commencement of operation.

This OEMP will be reviewed annually, as a minimum (until all areas are operational), which may lead to revision of the document.

In accordance with CoC C8, the strategies, plans and programs required under the Development Consents will be reviewed within three months of the:

(a) the submission of an incident report under Condition C10

(b) the submission of an Independent Audit under Condition C17

(c) the approval of any modification of the conditions of the consent

(d) the issue of a direction of the Planning Secretary under Condition A3(b) which requires a review.

DPHI will be notified that the review has been undertaken, and where revisions are required, the revised document must be submitted to the Secretary for approval within six weeks of the review in accordance with CoC C9.

In addition to the triggers above, the OEMP may be revised more regularly as a result of:

- Inspection outcomes (either internal or by external parties)
- Changes to the Environmental Management System (EMS)
- Changes to procedures and/or scope of works after an incident or potential incident
- Design changes
- Opportunities for improvement identified as part of an investigation or non-compliance report (NCR)
- Material complaints.

1.6. Document Structure

The structure of this OEMP is summarised below.

- **Section 1** provides a brief overview of the MIP and the purpose of the OEMP.
- **Section 2** provides a summary of operations.
- **Section 3** outlines the statutory requirements and obligations which need to be fulfilled during operations.
- **Section 4** provides a description of the roles and responsibilities for employees involved in operations. This section also outlines the environmental objectives and targets, and relevant training and inductions required so that employees are aware of their environmental obligations.
- **Section 5** provides the environmental risk analysis which identifies the key environmental risks for operations.
- **Section 6** provides the monitoring, reporting, and auditing requirements and management of any environmental incidents and non-conformance.

2. Development Description

The Development is being undertaken in accordance with the following approvals:

- MPW EPBC (EPBC 2011/6086), approved on 27 September 2016 by Department of Climate Change, Energy, the Environment and Water (DCCEEW) (formerly Department of the Environment and Energy (DotEE))
- Consolidated MPW Stage 2 (SSD 7709) Development Consent (SSD 7709), approved on 11 November 2019 by NSW Independent Planning Commission (IPC); reissued by the NSW Land & Environment Court on 24 December 2021
- MPW Stage 2 Modification 1 (SSD 7709 MOD 1), approved on 24 December 2020 by IPC
- MPW Stage 2 Modification 2 (SSD 7709 MOD 2), approved on 30 September 2021 by IPC.

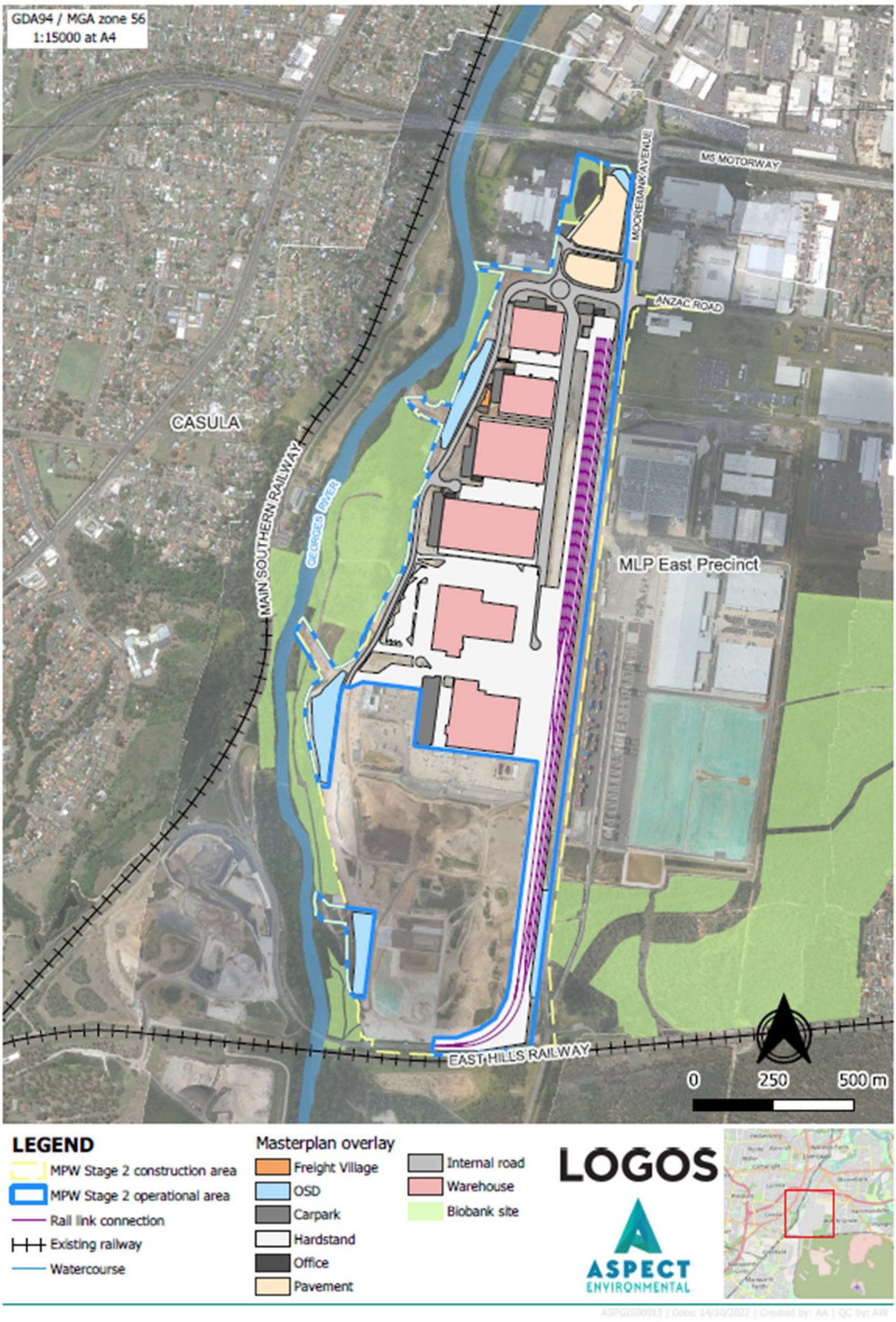
The MPW Stage 2 Development involves:

- Construction and 24/7 operation of an intermodal terminal (IMT) facility to support a container freight throughout volume of 500,000 twenty-foot equivalent units (TEUs) per annum, including:
  - a rail terminal with nine rail sidings
  - a rail link connection from the sidings to the rail link constructed under MPE Stage 1 (SSD 6766) to the Southern Sydney Freight Line (SSFL)
  - rail and truck container loading and unloading and container storage areas
  - truck waiting area and emergency truck storage areas
  - container wash-down facilities and degassing area
  - mobile locomotive refuelling station
  - engineer's workshop, administration facility and associated car parking.
- Operation of the IMT facility includes operation of the rail link to the SSFL and container freight movement by truck to and from the MPE Site.
- Construction and 24/7 operation of a warehousing estate on the northern part of the site servicing the IMT facility and including:
  - six warehouses with a total gross floor area (GFA) of 215,000m^2 and, for each warehouse, associated offices, staff amenities, hardstands and truck and light vehicle parking
  - 800m2 freight village (operating from 7am to 6pm, 7 days/ week) including staff/ visitor amenities
  - internal roads, noise wall, landscaping, lighting and signage.
- Intersection upgrades on Moorebank Avenue at:
  - Anzac Road providing site access
  - Bapaume Road for left turn only out of the site.
- Construction and operation of on-site detention basin, bioretention/ biofiltration systems and trunk stormwater drainage for the entire site.
  - Construction works and temporary ancillary facilities, including:
  - vegetation clearing, topsoil stripping and stockpiling and site earthworks and temporary on site detention

- importation of up to 1,600,000m^3 of uncompacted fill, temporary stockpiling and placement over the entire site to raise existing ground levels by up to 3m
- materials screening, crushing and washing facilities
- importation and placement of engineering fill and rail line ballast
- installation and use of a concrete batching plant
- utilities installation/connection.

The Development's operational layout is shown in Figure 2-1.

Figure 2-1 MPW Stage 2 operational layout



2.1. MPW Stage 2 Operational Activities

The MPW Stage 2 Development involves the operation of the IMT facility, rail link connection and warehousing. The operational activities within the Development are:

2.1.1. IMT facility

2.1.1.1. Rail freight

IMT facility would support the transport of freight by rail between Victoria, Queensland and regional NSW and port shuttle movements. Trains would enter the IMT facility using either the northern or southern Rail link connections, and the Rail link. They would then be unloaded, with freight distributed through a container flow. Empty trains would then be re-loaded with freight containers from the determined locations. Full trains would be sent interstate, intrastate or via port shuttle to a Sydney based port (e.g. Port Botany) by means of the Rail link and the SSFL.

2.1.1.2. Road freight

The IMT facility would support the transfer of freight between road and rail within NSW. Trucks would enter the IMT facility at the northern end via the main entrance off Moorebank Avenue or via the internal road if coming from the warehousing area within the Development. Trucks entering the IMT facility would be processed at the truck processing gates and authorized trucks would be held within the truck loading area and/or progress to loading areas. Once in location these trucks would be loaded/unloaded using manual container handling equipment. Unloaded freight would be distributed through one of the container flows. Once loaded/unloaded, trucks would exit the IMT facility.

2.1.1.3. Inter-precinct freight transfer

A portion of freight would be transferred from the IMT facility to the warehousing area within the Development or to the IMEX terminal on the MPE Site without accessing the broader road network. These containers would be transferred using designated site transfer trucks.

2.1.2. Rail link connection

The Rail link will enable freight trains to connect the IMT facility and travel from both north and south. Trains would have the capability to wait at an area (which includes facing and trailing crossovers) to the east of the Georges River, prior to entering the SSFL. This would also provide a clear path for trains exiting the SSFL.

2.1.3. Warehousing

Heavy and light vehicles would access the warehouses via the main site access off Moorebank Avenue, light vehicles would park in the allocated parking area adjacent to each warehouse, and heavy vehicles would progress to the truck loading/unloading areas alongside each warehouse. Table 2-1 provides a list of warehouses and their tenant.

Table 2-1 Warehouse tenants in the Development

Warehouse	Tenant
Warehouse N1	Maersk Logistics & Services Australia Pty Ltd
Warehouse N2	Sydney Tools Pty Ltd
Warehouse N3	TBA
Warehouse N4	TBA
Warehouse 5	Woolworths- Moorebank Regional Distribution Centre (MoRDC)
Warehouse 6	Woolworths- Moorebank National Distribution Centre (MoNDC)

2.1.4. Freight village (Precinct amenities)

Vehicles would access the precinct amenities area via the main site access off Moorebank Avenue and the internal road. Light vehicles would access and egress the area directly via the allocated parking area adjacent to the precinct amenities area. Service vehicles would enter the area via the one-way service road, which loops around the rear of the precinct amenities area and exits via the car park.

3. Statutory Requirements

The operation of the Development is required to comply with all relevant legislation, permits, licences and development approvals applicable to the MPW Stage 2 Site.

A copy of the approved OEMP and all relevant statutory documentation registers is available at the Site Office and shall be readily available for relevant regulatory officers, the Certifying Authority and operational staff.

3.1. Development Approvals

The operation of the Development is approved under both the *Environmental Planning and Assessment Act* 1979 (EP&A) Act), and the *Environment Protection and Biodiversity Conservation Act* 1999 (EPBC Act). Both these approvals have environmental conditions relevant to operations. Compliance with the relevant conditions of the approvals is outlined in the compliance matrices in Appendix A.

3.2. Legislation

The regulatory framework to identify relevant legislative instruments, their key objectives and relevance to the operation of the Development are outlined in Appendix F – Legislation register.

This list will be revised and updated in conjunction with the management review outlined in Section 6 or when there has been a change to relevant legislation.

In addition to complying with relevant legislation, industry best practice can be achieved through the adherence to relevant Australian standards and NSW guidelines.

3.3. Permits and Licences

Permits and licences relevant to operations are detailed in Appendix B – Facility permits and licences register. This register is to be revised and updated in conjunction with the management review outlined in Section 6, or when there has been a change to relevant legislation.

Compliance conditions relating to items listed on this register are incorporated into this OEMP and where relevant in the associated sub-plans.

A summary of the key permits and licences applicable to operations is provided below.

3.3.1. Environmental Protection Licence

Operation of the MPW Stage 2 Development will be undertaken in accordance with the requirements of the *Protection of the Environment and Operations Act* 1997 (POEO Act). An EPL may be issued under Section 43(b) of the POEO Act to authorise the carrying out of scheduled activities at any premises, as required under Section 48. The requirement for an EPL under Section 48(1) applies to activities where Schedule 1 of the POEO Act indicates that a licence is required for premises at which the activity is carried out.

An EPL (Licence Number 21361) was issued for Moorebank Precinct on 4 August 2020 for railway activities – Rolling stock operations for any annual capacity.

If a variation EPL is required for operational activities, the OEMP will be updated to include amendments and requirements.

3.3.2. Utilities agreements and approvals

If any adjustments or relocations of a public utility are required in the future during operations, approval from the relevant utility service providers will be sought by LOGOS prior to undertaking the works.

A Section 73 Compliance Certificate from Sydney Water Corporation for water and sewerage infrastructure will be obtained prior to the commencement of operation, as required by CoC A51.

3.3.3. Dangerous Goods

The transport of dangerous goods by road and rail will comply with the following:

- *Dangerous Goods (Road and Rail Transport) Act 2008*
- *Dangerous Goods (Road and Rail Transport) Regulation 2014*
- Managing risks of hazardous chemicals in the workplace (SafeWork NSW, July 2014)
- EPA requirements for transporting dangerous goods by road and rail.

This is addressed in more detail in the Operational Traffic and Access Management Plan.

At this stage of operations, dangerous goods are expected to be received and stored within Warehouses 5 (MoRDC) and 6 (MoNDC), in accordance with quantities outlined in CoC B176A.

Drivers transporting dangerous goods will be appropriately trained and vehicles will have relevant permits in accordance with current legislation. Copies of permits and a register will be maintained on site and will be updated as required.

3.4. Guidelines

This OEMP and its sub-plans have been prepared in accordance with a list of guidelines and codes of practice as detailed in Appendix C – Guidelines and Codes of Practice, including the *Environmental Management Plan Guideline – Guideline for infrastructure Projects* (DPE, 2020).

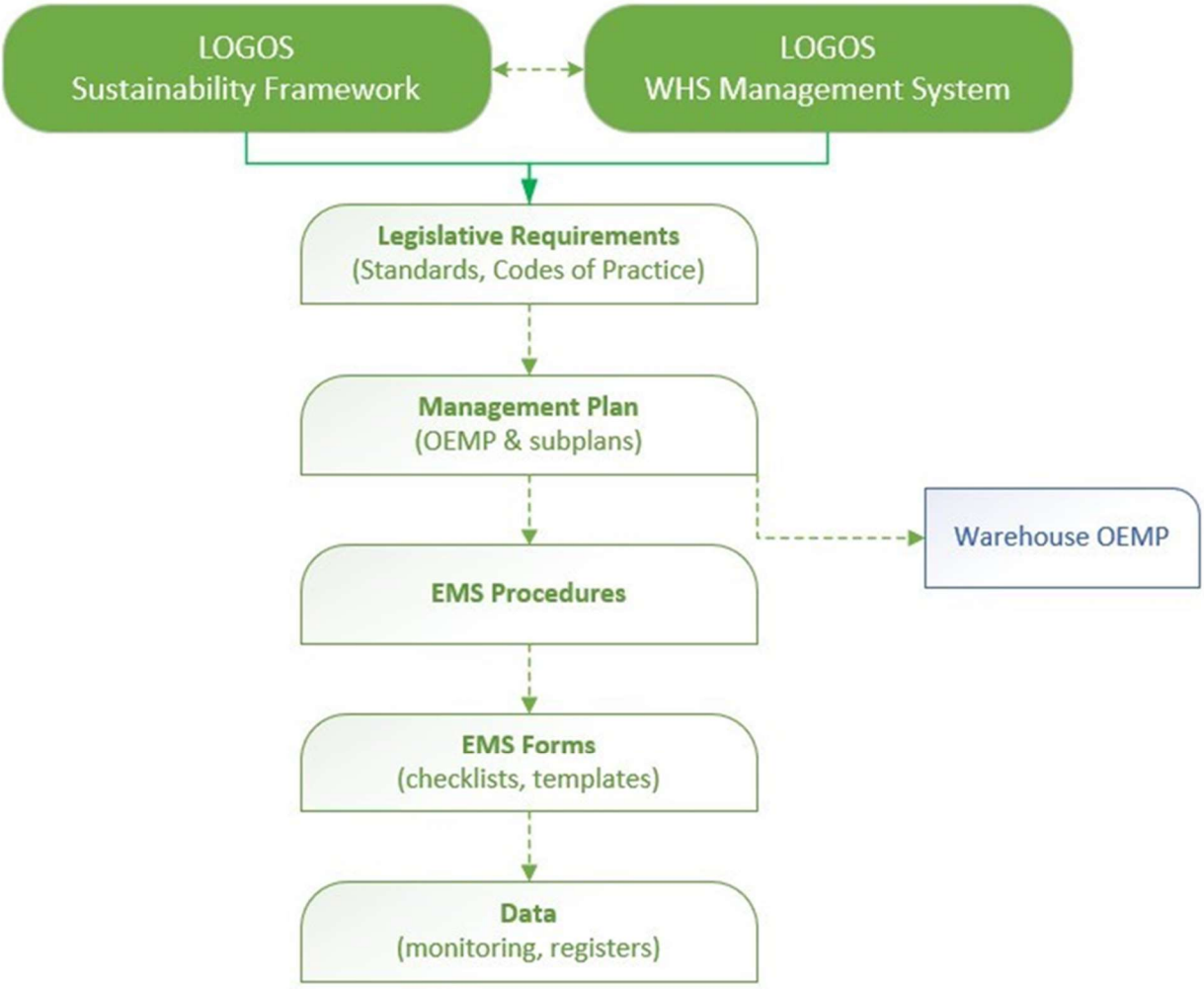
Refer to the relevant sub-plans for further information.

4. Environmental Management

4.1. Environmental Management System

LOGOS' Environmental Management System (EMS) comprises the WHS Management System & Sustainability Framework for environmental management and comprises of various procedures and policies to facilitate the identifying, managing and reporting of environmental risks. The EMS framework is shown in Figure 4-1. The EMS is aligned to AS/ANZ ISO 14001 (2015) and this OEMP will be implemented in a manner that is consistent with the requirements of EMS.

Figure 4-1 LOGOS EMS framework



4.2. MIP Sustainability Policy

The LOGOS Sustainability Policy (Appendix E – LOGOS Sustainability Policy) describes the commitment to provide sustainable, integrated logistics solutions that add value to our customers, investors, partners, and communities. This will include, but not limited to:

- Establishing meaningful and measurable sustainability goals and objectives relating to environment, social and governance principles across our Group's operations to ensure continuous improvement

- Promoting individual contributions to Group sustainability initiatives, through education and awareness, thereby building a strong environmentally aware business culture
- Investing in protecting, restoring and creating opportunities to improve the biodiversity of environments in which we may impact.

4.2.1. MIP Sustainability Framework

LOGOS' Group Sustainability Framework describes their commitment to environmental excellence through minimising impacts, enhancing climate resilience, and generating positive outcomes. The Development and its nominated contractors and tenants will operate in accordance with this framework.

Figure 4-2 LOGOS Sustainability Framework

4.3. Work Health and Safety Management Plan

The LOGOS WHS Management System expresses LOGOS's commitment to the health and safety of workers, and protection of the environment in which LOGOS operate. The LOGOS WHS Management System is aligned to AS/NZS ISO 45001 and to 14001 (2015) and provides the overarching policies, procedures, requirements, standards and guidelines that each area of the business must follow and implement, relating to WHS and environmental management.

The operation of the Development (and its nominated contractors and warehouse tenants) is to be in accordance with the applicable WHS Management System & Sustainability Framework, which will be:

- Displayed at prominent locations around the Development boundary
- Communicated to personnel during inductions and training
- Made publicly available and accessible too clients and concerned/interested members of the public.

This OEMP will be implemented in a manner that is consistent with the requirements of the LOGOS WHS Management System.

The approach to the management and control of environmental aspects of site operational activities completed by LOGOS and/or warehouse tenants and contractors under this OEMP is shown in Figure 4-1.

All LOGOS employees, terminal management and employees, warehouse tenants, contractors and visitors are required to comply with the requirements of the LOGOS WHS Management System, this OEMP and sub-plans and the Emergency Response Plan.

4.4. MPW Stage 3 Precinct Operational Environmental Management Plan

The MPW Stage 3 Precinct Operational Environmental Management Plan (MPW S3 POEMP) has been prepared to address the requirements of MPW Stage 3 (SSD 10431 CoCs D12 – D14.

The MPW S3 POEMP outlines the delivery and management responsibilities of estate works (such as the internal roads, OSDs and utilities as part of the subdivision of the MPW Site.

The MPW S3 POEMP has been included as Appendix I – MPW Stage 3 Precinct Operational Environmental Management Plan to this OEMP for completeness and ease of reference.

4.5. Operational Environmental and Sustainability Objectives and Targets

Table 4-1 Environmental and sustainability targets

Objective	Target	Timeframe	Responsibility
Compliance with relevant CoC and applicable legislation	No written warning or infringement notices	Ongoing	Site HSE Manager
Avoid unacceptable impacts on surrounding residents and commercial stakeholders	No exceedances of air quality, noise, vibration and light spill criteria No complaints regarding visual emissions (e.g. nuisance dust, smoky exhausts)	Ongoing	Site HSE Manager
Minimise pollutant discharges to receiving waters*	Gross Pollutants 90% Total Suspended Soils 85% Total Phosphorous 65% Total Nitrogen 45% Total Hydrocarbons 90%	Duration of operation and monitored in accordance with the SIOMP	Site HSE Manager
Reduce demand on water for non-potable uses such as toilet flushing and irrigation	Maximise runoff volume for reuse applications	Duration operation	Operations Manager
Diversion of waste from landfill	>60% of office waste by volume recycled	During operation	Site HSE Manager
Reducing water usage	100% of rainwater captured will be reused onsite	During operation	Site HSE Manager
Pathway to net zero emissions	100% of energy use /sources monitored	Ongoing - Reported annually	All

Objective	Target	Timeframe	Responsibility
	A minimum of 15% renewable energy sourced	Ongoing - Reported annually	All
Minimise social impacts	100% of complaints to be responded to within agreed timeframes of the Community Communication Strategy	Ongoing	Community Engagement Consultant

* Pollutant discharge targets are annual percentage reductions for a developed catchment and were sourced from the Stormwater Development Design Report (SDDR) SSD 7709 (Costin Roe, 2020).

4.6. Roles and Responsibilities

All personnel undertaking operational activities within the MPW Stage 2 Development are responsible for the implementation of this OEMP and have the responsibility to stop works if there is potential for a safety or environmental incident to occur.

The interaction between the organisations involved in operations is displayed in Figure 4-3 and responsibilities of the key roles are outlined in Table 4-2.

Figure 4-3 Organisation chart

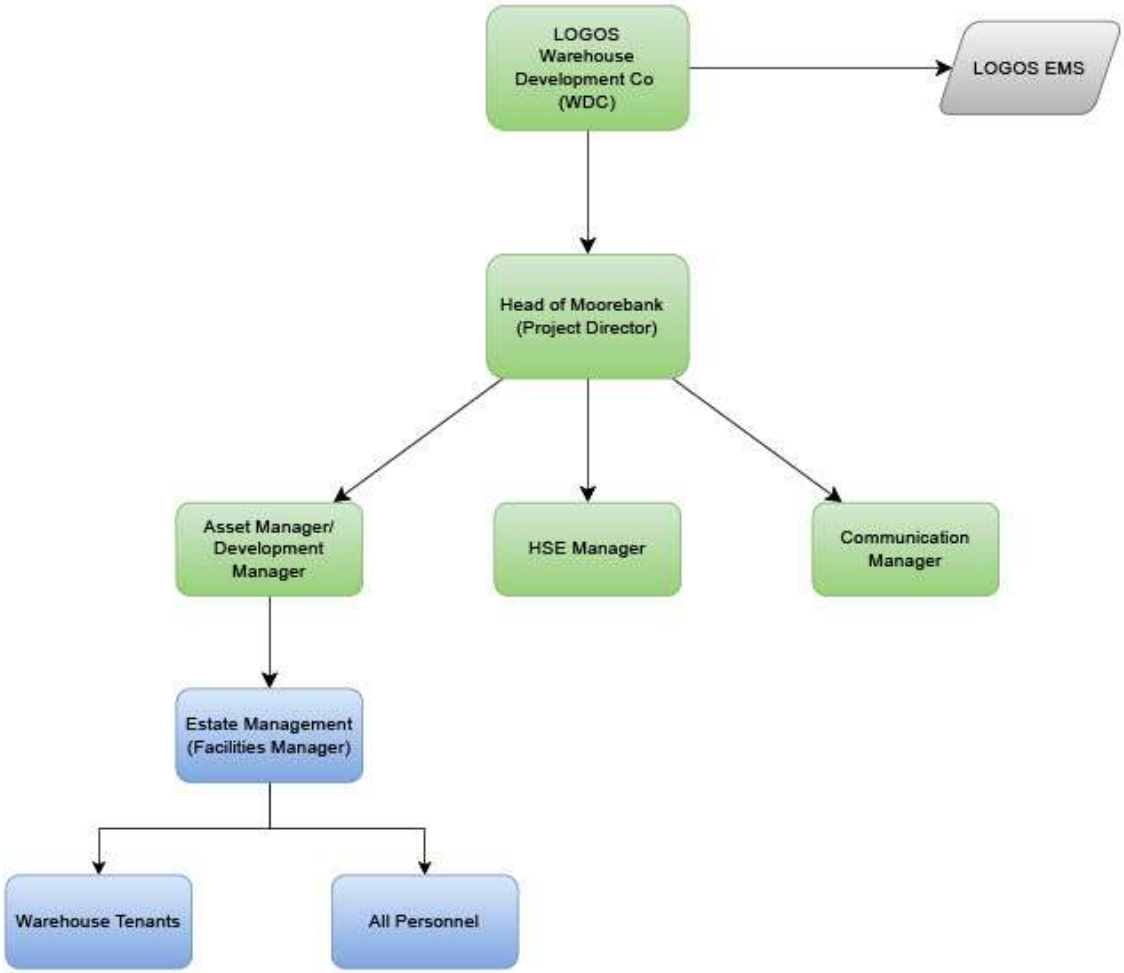


Table 4-2 Key roles and responsibilities

Role	Responsibility
Asset Manager/ Development Manager	• Provides sufficient resources to implement, develop and maintain the OEMP throughout the operating life of the MPW Stage 2 Development. • Implements stop work procedures where they believe a work activity to be an actual or potential cause of material harm pollution to the environment anywhere within the MPW Stage 2 Development. • Sets, defines and communicates the environmental goals and targets for the MPW Stage 2 Development. • Reports relevant environmental matters to personnel and include them in the agenda of management meetings. • Reviews and approves changes to the OEMP. • Report incidents to relevant authorities, and other land holders if relevant to land under their ownership.
Area Managers/Terminal Manager	• Promotes LOGOS environmental policies and is responsible for their implementation within the areas of responsibility • Communicates the requirements of the OEMP and environmental obligations to operational team • Has the authority to stop work processes within the area of responsibility to prevent environmental non-conformances from occurring or continuing • Co-ordinates and directs resources to manage responses to incidents • Monitors operations against the requirements of the OEMP and CoC and takes action to resolve issues where required • Where required, implements changes to activities to manage ongoing compliance • Reports incidents to the Asset Manager/ Development Manager in accordance with the OEMP • Monitors any environmental impacts arising from construction areas adjacent to MPW Stage 2 Development and report issues to the Operations Manager if these impacts raise compliance concerns for this OEMP.
Site Health Safety& Environment (HSE) Manager	• Acts as the primary contact point in relation to environmental performance of operations • Defines documents and communicates roles, responsibilities, and authorities of all personnel to facilitate effective HSE management • Provides advice on matters specified in the CoC and other relevant licenses and permits relating to the environmental performance and impacts • Reviews and ensures implementation of all management plans (OEMP and sub-plans) and monitoring programs required under the CoC and other relevant permits and licences • Reviews revisions to the OEMP and sub-plans • Has the authority and independence to require reasonable steps be taken to avoid or minimise unintended or material environmental harm and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur

Role	Responsibility
	• Reports environmental incidents to Area Manager and Operations Manager where required, in accordance with the Incident reporting system outlined in the OEMP • Acts as the 24-hour EPA contact • Monitors operations against the OEMP through regular site inspections to evaluate compliance with the CoC • Monitors environmental control strategies for deficiencies and implements resolutions and monitors work activities until deficiencies are rectified • Receives and responds to complaints and inquiries in relation to the environmental performance of operations • Facilitates the inductions and training program for relevant persons involved with operations • Maintains the register of environmental complaints and the subsequent remedial action • Maintains a register of accidents, incidents and potential incidents with actual or potential significant off-site impacts on people or the biophysical environment.
LOGOS Communications Manager	• Will direct Community Engagement Consultants as required • Will act as the 'control tower' for all public communications and will be the central contact to keep nearby residential receivers informed of the Development. • Prepares and coordinates content for the Development website, newsletters, factsheets, etc. • Monitors, responds to and triages calls and emails relating to operation of the MPW Stage 2 Development • Prepares overarching key messages for operations • Manages the calendar of all communication and engagements activities during operation. • Attends the Community Consultative Committee Meetings as a representative of LOGOS.
Warehouse Tenants	• Responsible for their own environmental performance for operational activities on leased areas • Must comply with the conditions of their lease or licence • Reports environmental incidents to Area Manager and/or the Site HSE Manager • Track their compliance with the relevant CoC and provide Environmental Compliance Reports to LOGOS which detail their compliance status.
All personnel	• Undertake work activities in a manner that minimises the potential for pollution of land, air, water, community amenity, and/or the generation of waste or threatens to cause material harm • Takes all feasible and reasonable steps to comply with the requirements of this OEMP • Complies with lawful management directions to prevent environmental harm or enhance protection of site environmental values • Stops works if there is a potential risk of material harm

Role	Responsibility
	• Promptly reports to management on any non-conformances, perceived non-compliances, or environmental incidents • Undergoes induction and training in environmental awareness.

4.7. Training and Competence

All personnel are to complete general environmental awareness training and training relevant to their responsibilities under the OEMP; the level of which would be dependent on the exposure to environmental hazards and their involvement in environmental management. Table 4-3 outlines the environmental training requirements.

Table 4-3 Environmental training requirements

Level	Topic covered	Relevant employees
Visitor induction	• OEMP awareness • LOGOS' Environmental and Sustainability Policies • Environmental obligations • Environmental issues and management relevant to operations • Key environmental constraints, including biodiversity offset areas and precautions in relation to the stormwater management infrastructure e.g. rain gardens • Evacuation procedures • Recognising actual or potential incidents • Incident reporting protocols.	Visitors site induction
General induction	• OEMP awareness • LOGOS Environmental and Sustainability Policies • Environmental obligations • Roles and responsibilities relating to environmental management for operations • Key environmental issues, for example, location of sensitive areas and nearest sensitive receivers • Incident response and reporting procedures, including spill control, containment and clean up and protection of stormwater infrastructure • Details of environmental protection offences and penalties, and duty to notify of environmental harm • Evacuation procedures.	LOGOS personnel Contractor personnel Tenants undertaking activities within the MPW Stage 2 Development
Development Management Team training	• Requirements of the OEMP • Incident management and emergency response procedures, including: - Classification of incidents based on their severity	Area manager/ Terminal operator Contractor supervisor

Level	Topic covered	Relevant employees
	- What emergency services are required - What incidents are reportable to the authorities • Incident reporting procedures in accordance with the OEMP, including internal notification and external notification to authorities and relevant land holders.	Warehouse manager
Vocational training	Examples of vocation training include: • Environmental monitoring and management (e.g. air, water, soil and noise) • Environmental compliance, auditing and inspection • Natural resource management • Occupational hygiene monitoring (e.g. air, noise and radiation) • Water supply and treatment, storm and wastewater management • Solid and hazardous waste management • Site remediation or rehabilitation • Resource efficiency (e.g. energy, water and waste auditing) • Terminal and warehouse staff handling dangerous goods will be required to have successfully completed appropriate dangerous goods training.	LOGOS Contractor personnel Tenant personnel responsible for environmental management

4.8. Community Consultation and Complaints Management

A Community Communication Strategy (CCS) has been developed to provide mechanisms to facilitate communication between LOGOS and the key stakeholders, including regulators, Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the Development). The CCS is required to be implemented for a period of 12 months following the commencement of MPW Stage 2 operation.

LOGOS' Communications Manager will manage all community liaison in accordance with the CCS. LOGOS may engage community engagement consultants to support these community liaison activities.

In addition, a Community Consultative Committee (CCC), comprising LOGOS, National Intermodal Corporation, Qube, Council, members of the local community, stakeholder groups and an independent chairperson, was established prior to construction of the Development and will continue for the duration of construction, upgrading and operation and for at least six months following the completion of decommissioning.

The CCC will continue to consider community issues and concerns and review environmental impacts resulting from the operation of the MPW Stage 2 Development.

4.8.1. Complaint management

Public complaints are to be logged with the relevant Area Manager and are to be responded to in accordance with the CCS. Public complaints may be received via:

- Development email – moorebank@tsamgt.com
- 24-hour Development information line – 1800 986 465
- Postal address – Level 15, 207 Kent Street, Sydney, NSW, 2000
- Development website – moorebankintermodalprecinct.com.au
- Face to face interactions with Development personnel.

Environmental related complaints are to be managed in accordance with the CCS.

4.8.2. Damage to third party property or infrastructure

Incident reports (including complaints) of damage to third party property or infrastructure due to operational work will be treated as an incident. Further detail of incident management is outlined in Section 4.9.

Potential damage is to be notified, classified, reported and investigated as per the incident management process. Section 3.2.17 of the OTAMP contains a mechanism for the identification and rectification of damage to roads and road infrastructure. Third party landholders are to be notified of damage occurring on property under their ownership.

The initial response will follow the complaints process, as outlined within the CCS, however investigations and potential rectifications will be undertaken as per the incident management process. Dispute resolution is outlined within the CCS.

4.8.3. Safety, security and vandalism

The Development includes a number of on-site security measures to ensure the protection and safety of the Development, employees and authorised visitors, while incorporating safer by design principles. Security is detailed in the Urban Design Development Report (UDDR).

With restriction on access, active surveillance and opportunities for passive surveillance, the risk of graffiti within the Development is considered to be low. There is the potential for external signage to be subject to graffiti, however CCTV monitoring will reduce this risk. Consistent with the principle of maintaining well cared for spaces outlined in Crime prevention and the assessment of development applications Guidelines under section 79C of the *Environmental Planning and Assessment Act* 1979 (Department of Urban Affairs and Planning, 2001), graffiti will be removed soon after it is identified.

The presence of graffiti will be monitored in accordance with the inspection process identified in Section 6.3.2. Graffiti to non-tenanted areas (i.e. external signage) will be removed by LOGOS and graffiti to tenanted areas will be removed by the tenant within 48 hours of identifying the incident. If graffiti has offensive content, more immediate removal will be organised.

4.9. Incident Management and Emergencies

An environmental incident is defined within the Consolidated Consent as an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. Environmental incidents include pollution incidents and environmental emergencies. Environmental incidents may arise from natural (e.g. storm, wind or bushfire) or human factors. Note that non-conformances and non-compliances are addressed separately in Section 6.4.

A pollution incident is an incident or set of circumstances during which or as a consequence of, 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. It does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).

The Emergency Response Management Plan provides specific detail on emergency response.

4.9.1. Environmental incidents

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

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

All significant environmental and pollution incidents shall be reported immediately to the:

- Asset Manager/Development Manager
- Area Manager/Terminal Manager
- LOGOS Site HSE Manager.

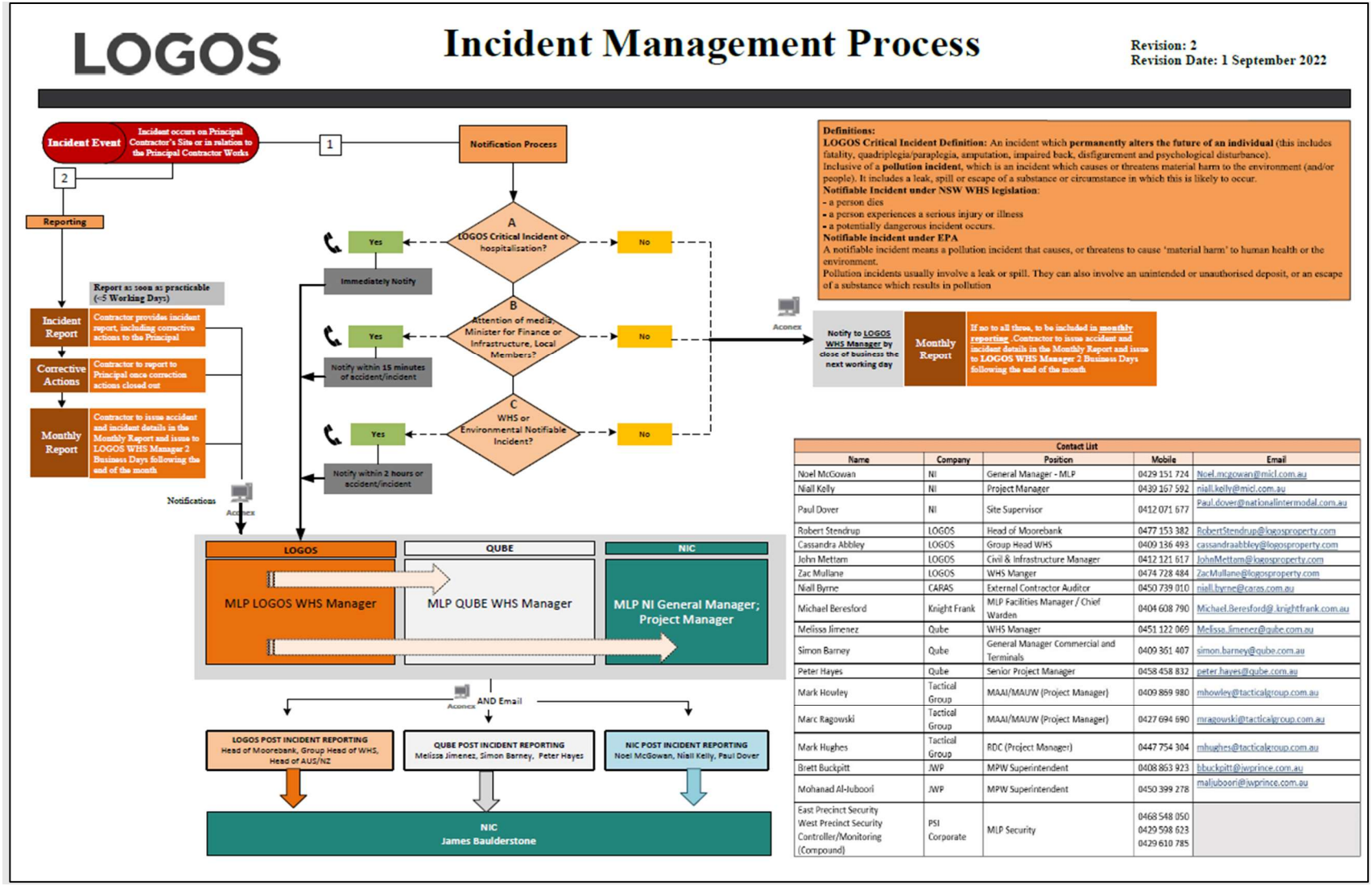
LOGOS Site HSE Manager will maintain a register of accidents, incidents and potential incidents with actual or potential significant off-site impacts on people or the biophysical environment.

4.9.2. Incident classification and notification

All environmental incidents are to be reported and managed in accordance with LOGOS Incident Reporting and Management Procedure (WHSMS-LOGOS-007).

Incidents are classified based on the incident's severity as shown in Table 4-4. Should the incident be identified as a Class 2 or Class 3 incident, the reporting protocol identified in Section 4.9.4 will be triggered.

Figure 4-4 Environmental incident notification and reporting



Contact List

Name	Company	Position	Mobile	Email
Noel McGowan	NI	General Manager - MLP	0429 151 724	Noel.mcgowan@micl.com.au
Niall Kelly	NI	Project Manager	0439 167 592	niall.kelly@micl.com.au
Paul Dover	NI	Site Supervisor	0412 071 677	Paul.dover@nationalintermodal.com.au
Robert Stendrup	LOGOS	Head of Moorebank	0477 153 382	RobertStendrup@logosproperty.com
Cassandra Abbley	LOGOS	Group Head WHS	0409 136 493	cassandraabbley@logosproperty.com
John Mettam	LOGOS	Civil & Infrastructure Manager	0412 121 617	JohnMettam@logosproperty.com
Zac Mullane	LOGOS	WHS Manger	0474 728 484	ZacMullane@logosproperty.com
Niall Byrne	CARAS	External Contractor Auditor	0450 739 010	niall.byrne@caras.com.au
Michael Beresford	Knight Frank	MLP Facilities Manager / Chief Warden	0404 608 790	Michael.Beresford@.knightfrank.com.au
Melissa Jimenez	Qube	WHS Manager	0451 122 069	Melissa.Jimenez@qube.com.au
Simon Barney	Qube	General Manager Commercial and Terminals	0409 361 407	simon.barney@qube.com.au
Peter Hayes	Qube	Senior Project Manager	0458 458 832	peter.hayes@qube.com.au
Mark Howley	Tactical Group	MAAI/MAUW (Project Manager)	0409 869 980	mhowley@tacticalgroup.com.au
Marc Ragowski	Tactical Group	MAAI/MAUW (Project Manager)	0427 694 690	mragowski@tacticalgroup.com.au
Mark Hughes	Tactical Group	RDC (Project Manager)	0447 754 304	mhughes@tacticalgroup.com.au
Brett Buckpitt	JWP	MPW Superintendent	0408 863 923	bbuckpitt@jwprince.com.au
Mohanad Al-Juboori	JWP	MPW Superintendent	0450 399 278	maljuboori@jwprince.com.au
East Precinct Security West Precinct Security Controller/Monitoring (Compound)	PSI Corporate	MLP Security	0468 548 050 0429 598 623 0429 610 785	

Table 4-4 Environmental incident classification

Severity level	Direct cost including clean-up	Description of impact
Level 1 Insignificant	Up to $10,000	• Pollution or degradation which has a trivial impact on the community and/or environment in the short-term (<1 month duration) and is fully reversible with no residual impacts • Harming a protected animal that is not vulnerable or threatened • No environmental damage • Environmental hazard identified • On site release of pollutant (<20 litres/Kg).
Level 2 Minor	$10,000 to $100,000	• Pollution or degradation which has moderately severe impacts on the community and/or environment (1-3 months duration) but is fully reversible with no residual impacts • Harming an animal that is (or is part of) a vulnerable species or vulnerable ecological community • Picking a plant that is (or is part of) a vulnerable species or vulnerable ecological community. • Onsite release of pollutant (<200 litres/kg) that is immediately contained without causing land contamination and does not migrate offsite to land or waterways.
Level 3 Moderate	$100,000 to $1 million	• Pollution or degradation which has highly severe impacts on the community and/or environment and may have irreversible residual impacts • Harming an animal that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community) (S2.1) • Picking a plant that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community) • Damaging a declared area of outstanding biodiversity value • Knowingly damaging any habitat of a threatened species or threatened ecological community • Contravention of a stop work order. • Onsite release of pollutant (<200 litres/kg) that is mostly contained but causes moderate contamination (refer to financial loss) OR Offsite release of pollutant (<200 litres/kg) to land or waterways – *Protection of the Environment Operations (POEO) Act 1997* breaches.
Level 4 Major	$1 million to $10 million	• Onsite release of pollutant (200 to 2,000 litres/kg) that causes major contamination (refer to financial loss) or Offsite release of pollutant (200 to 2,000 litres/kg) to land or waterways.

Level 5 Critical	$10 million to $100 million	• Onsite release of pollutant (>2,000 litres/kg) that causes catastrophic land contamination (refer to financial loss) OR • Offsite release of pollutant (>2,000 litres/kg) to land or waterways.

4.9.3. Incident responses

All environmental incidents are to be managed in accordance with the flowchart shown in Figure 4-5.

Figure 4-5 Environmental incident response flowchart

INCIDENT RESPONSE

STOP work immediately and CHECK for danger.

Senior member of the team present when incident occurs is to take charge and DELEGATE the main assisting roles of the emergency response.

CONTACT Site Emergency Response Team and await further assistance if required.

CONTACT emergency services (000) if an incident presents an immediate threat to human health or property.

WEAR appropriate Personal Protective Equipment (PPE).

ELIMINATE source of danger.

CONTROL the source of the incident e.g. stop dust emitting activity, right an upturned drum.

CONTROL the incident e.g. earth or sand bunds to control spills.

CHECK the incident does not have the potential to cause further harm (e.g. check spill has not reached any nearby watercourse/ sensitive areas)

Follow notification process as shown in Figure 4-4.

CLEAN UP plan to be prepared and implemented.

4.9.4. Reportable incidents

Regulatory authorities will be notified of actual or potential Level 3-5 incidents. The notification processes for the relevant regulatory authorities are summarised below. Records of contact with, and details of the information provided to external authorities will be maintained by LOGOS' Site HSE Manager.

4.9.4.1. NSW EPA

In accordance with POEO Act, the relevant Area Manager/Terminal Manager will immediately, after becoming aware of the incident, notify the EPA of all actual or potential Level 3-5 incidents via the EPA Environment Line (131 555).

The notification to the EPA needs to include information on:

- The time, date, nature, duration and location of the incident
- The location of the place where pollution is occurring or is likely to occur
- The nature, the estimated quantity or volume and the concentration of any pollutants involved
- The circumstances in which the incident occurred (including the cause of the incident, if known)
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution
- Other information prescribed by the regulations.

4.9.4.2. DPHI

DPHI are to be notified in writing (compliance@planning.nsw.gov.au) immediately upon the Applicant becoming aware of an incident that causes or threatens to cause material harm (as defined by the Development Consent), in accordance with CoC C10.

A written incident notification must be provided to the Secretary within seven days of the date on which the incident occurred.

In accordance with CoC C10 and Appendix 3 of the Consolidated Consent, incident notifications must:

- Identify the Development and application number
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
- Identify how the incident was detected
- Identify when the Applicant became aware of the incident
- Identify any actual or potential non-compliance with conditions of consent
- Describe what immediate steps were taken in relation to the incident
- Identify further action(s) that will be taken in relation to the incident
- Identify a Development contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred or as otherwise agreed by the Planning Secretary, an incident report must be submitted to the Planning Secretary and must include:

- A summary of the incident
- The outcomes of an incident investigation, including identification of the cause/s of the incident
- Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
- Details of any communication with other stakeholders regarding the incident.

All external notification of environmental incidents will be undertaken by the Asset Manager/Development Manager.

Records of contact with and details of the information provided to external authorities must be maintained in the project records. Any contact with the regulatory authorities will be logged using Aconex and managed via LOGOS' incident management system.

4.9.4.3. DCCEEW

Environmental incidents relating to the EPBC Act must be notified to the Secretary of the DCCEEW within seven days of the event (EPBCmonitoring@environment.gov.au).

These types of incidents are the death or injury to the following:

- Listed Migratory bird species
- Listed marine species
- Threatened species or listed ecological community (includes taking of listed plants and animals).

4.9.4.4. Other relevant authorities

In addition to notifying the EPA, DPHI and DCCEEW of pollution incidents, the Asset Manager /Development Manager is also required to notify other regulatory authorities as outlined below. Contact details are provided in Table 4-5.

- Ministry of Health (via the local Public Health Unit – 02 9391 9000)
- Safework NSW – 13 10 50
- Liverpool City Council – 1300 36 2170
- Campbelltown City Council – 02 4645 4000
- Fire and Rescue NSW – 000
- NSW Environment and Heritage – 1300 361 967
- Third party land holders (where appropriate).

These authorities must be notified for all notifiable pollution incidents under Section 148 of the POEO Act 1997. Further information in relation to the incident must be provided immediately if it becomes available after the initial notification.

4.9.5. Incident review

A review of the incident will be undertaken in accordance with WHSMS-LOGOS-007.

Within three days of a potential or actual Level 3, Level 4 or Level 5 incidents, the LOGOS Site HSE Manager for MPW Stage 2 Development will convene a briefing to provide an update on the incident to relevant senior management.

The following information relating to the incident will be documented:

- Condition of the environment and the status of any rectification or remediation works
- Completed Incident Cause Analysis Method (ICAM) report, including appropriate causal analysis and corrective actions
- Program for the implementation of the corrective actions and any maintenance activities
- Incorporation of any requirements of regulatory agencies as a result of external notification
- Any other relevant information.

Any written requirements of the Secretary (or relevant public authority) that may be given to address the cause or impact of an incident will be complied with and within any circumstances specified by the Secretary or relevant public authority.

LOGOS will keep evidence to show the recommendations from the ICAM have been undertaken.

4.9.6. Emergency contact details

Emergency contact details are included in Table 4-5.

Table 4-5 Emergency contact details

Service	Authority	Contact number
Local Emergency Operations Controller	Emergency	000
Knight Frank – Facilities Response Centre	Local	1300 553 065
Fire Brigade	Emergency	000
Ambulance	Emergency	000
Liverpool Police Station	Emergency	02 9821 8444
State Emergency Service	Emergency	13 25 00

Service	Authority	Contact number
Liverpool Hospital Cnr Elizabeth and Goulburn Streets Liverpool NSW 2170	Local	02 8738 3000
Local Medical Centre Elizabeth Drive Medical Centre, 177 Elizabeth Dr, Liverpool	Local	02 9600 7778
NSW Fire and Rescue	Local	1300 729 579
NSW Rural Fire Service Cnr Alderney Street and Townson Avenue, Minto NSW 2566	Local	1800 679 737 02 9603 7077
RMS Traffic Incident Reporting	Local	13 17 00
Sydney Trains Safety Incident and Injury	Local	1800 772 779
Sydney Trains Rail Management Centre	Local	02 9379 1743
ARTC Australian Rail Track Corporation (Enquiries)	Local	(08) 8217 4366
OEH Hotline	Emergency	13 15 55 02 9995 5555 (if calling from outside NSW)
Poisons Information	Poisons Information	13 11 26
Liverpool City Council Ground Floor, 33 Moore St, Liverpool NSW 2170	Customer Contact Centre for NSW Residents	1300 36 2170
	Calling from interstate	02 9821 9222

Service	Authority	Contact number
	National Relay Service (NRS) for hearing and speech impaired customers	133 677
Safe Work NSW	Customer Contact Number	13 10 50
	NRS for hearing and speech impaired customers	133 677
Managing Agent Hotline number	Local	1300 553 065
LOGOS Asset Manager	Local	0414 183 441
LOGOS Site HSE Manager	Local	0474 728 484
Emergency Response Team	See 'Emergency Management Plan & Communication Chart'	
Utilities		
Electricity	Ausgrid (24 hours)	13 13 88
	Endeavour Energy (24 hours)	13 10 03
Water	Sydney Water	13 20 90
Gas	Jemena	13 19 09
Network	Telstra	13 22 03
	Optus	13 13 44
	NBN	1800 687 626
After Hours Contacts		
Security Guard	PSI Corporate	0429 598 623

5. Implementation

This section addresses the key risks and environmental performance issues associated with operations and the environmental controls to manage the key risks.

Contractors undertaking site activities on behalf of LOGOS will be required to work under this OEMP but may utilise their own business and risk management systems and processes to develop any necessary site-specific safety and environmental management documentation and induction materials, taking into account the activity risk assessment, any relevant mitigation measures and any site / task specific risks that may require other or additional mitigation measures and controls to be applied.

As per Table 4-3 LOGOS employees, warehouse tenants and contractors are to be trained in the requirements of this OEMP to enable the environmental risks to be managed in accordance with this OEMP and the Conditions of Consent.

5.1. Risk Assessment and Management

Environmental aspects, impacts and opportunities associated with the operation of the MPW Stage 2 Development have been identified and assessed in accordance with the Environmental Risk Analysis as presented in the MPW Stage 2 EIS and risk workshop as detailed in Section 5.1.1. This analysis was based on the requirements of the standard ISO 31000.

The key environmental aspects and impacts for operations are:

- Traffic impacts on surrounding local and regional roads
- Noise and vibration impacts caused by operation of container handling equipment, locomotive and truck movement on surrounding residents and businesses
- Diminishing air quality through vehicle emissions and dust generation
- Loss of biodiversity
- Regional and local hydrological impacts
- Pollution of adjacent waterways from water discharge and/or spills from the Development
- Adverse flood impacts and increases in stormwater discharge
- Discovery of unidentified contaminated soils and groundwater
- Visual impacts to local residences and businesses and users of Moorebank Avenue
- Bushfire ignition
- Direct and indirect greenhouse gas emissions as a result of operation
- Community concern over impacts to environmental health
- Discovery of unidentified Aboriginal or non-Aboriginal heritage.

5.1.1. Aspects and impact assessment

A review of the aspects and impacts register that accompanied the submission of the MPW Stage 2 Environmental Impact Assessment (Arcadis, 2017) was undertaken to identify and update the aspects and impacts resulting from operations and to determine the relevant risk ranking, control measures and residual risk ranking.

The Aspects and Impacts Register (Appendix D – Aspect and impact register) identifies the actual or potential environmental impact and provides a reference to relevant management documentation within the OEMP where control measures can be found.

Environmental impacts will be controlled to a level that is commensurate with the level of risk, with greater emphasis on managing impacts with 'moderate' and 'high' risks. These will be detailed within the management measures of each aspect specific sub-plan.

The Aspects and Impacts Register will be updated on an annual basis with the review of the OEMP or where additional aspects, impacts or opportunities are identified during operation of the Development and specific site conditions are encountered and documented. Risk assessments will also be undertaken prior to commencing any previously unforeseen activities on the site.

5.2. Environmental Management Measures

Environmental management measures to be implemented during operations to enable compliance with relevant statutory requirements, limits, performance measures and criteria are documented in the OEMP sub-plans, and the Aspects and Impacts Register (Appendix D – Aspect and impact register).

5.2.1. Environmental aspects and sub-plans

This OEMP has been prepared in an aspect-based format that nominates for each environmental aspect, the tasks that are required to be addressed during the operational phases of the Development, covering where relevant:

- Environmental aspects
- Environmental objectives
- Control measures
- Monitoring.

The key environmental aspects are assessed in the relevant sub-plans to this OEMP which provide the specific detailed control measures being implemented to manage the complete range of environmental aspects. The Sub-Plans to this OEMP are:

- Stormwater Infrastructure Operation and Maintenance Plan
- Stormwater Quality Monitoring Program
- Landscape Vegetation Management Plan
- Combined MPE/MPW Operational Air Quality Management Plan
- Operational Traffic and Access management Plan
- Operational Noise Management Plan
- Operational Flora and Fauna Management Plan.

The following sections address the other environmental aspects of the Development.

5.2.1.1. Visual impact

The Development is in keeping with the surrounding land uses and any visual impacts will be effectively mitigated through the implementation of measures such as:

- The use of directional lighting to avoid light spill to residences and surrounding bushland
- Planted vegetation along Moorebank Avenue including trees and shrubs that screen viewpoints of the IMT and warehouses
- Building setback from Moorebank Avenue
- Sensitive architectural design consideration of building orientation, height and colouration
- Vegetated on-site detention basins.

Further detail regarding light spill management is provided in Appendix G – Light spill management.

5.2.1.2. Water quality

The following measures will be implemented to manage and mitigate water quality impacts.

- Promptly report all spills to the HSEQ Manager.
- Spills are to be managed in accordance with the Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin (EPA, 1997).
- Emergency spill clean-up kits will be maintained on-site in agreed locations that are accessible and known to all site workers.
- Spill kits will be used in the event of inadvertent spills of fuels, oils, hydraulic fluids and other hazardous wastes to contain the spill and avoid contamination of waters.
- Personnel will be trained in the use of spill kits.

5.2.1.3. Waste

The following measures will be implemented for waste management within the Development.

- Waste disposal will be in accordance with the POEO Act, *Waste Avoidance Resource Recovery Act* 2001 and the EPA's NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.
- Waste that is unable to be reused or recycled will be disposed of offsite to an EPA approved waste management facility following classification in accordance with EPA Waste Classification Guidelines (2014).
- Waste separation and segregation will be promoted to facilitate reuse and recycling.
- Liquid wastes to be stored in appropriate containers in bunded areas until transported offsite (if applicable).
- Hazardous waste will be managed by appropriately qualified and licensed contractors (if applicable).

- All recyclable or non-recyclable wastes to be stored in appropriate bins or skips with regular replacement and disposal of the bins to approved and appropriately licensed facilities.

5.2.1.4. Contamination

Residual risk of the contamination of soils will be mitigated through the implementation of following mitigation measures.

- Mitigation measures outlined in the Emergency Response Plan
- Diesel tanks (used for refuelling) will be self-bunded and compliant with AS - 1940-2004 The storage and handling of flammable and combustible liquids
- A spill kit will be provided onsite at all times
- A refuelling procedure will be developed and implemented for all refuelling activities undertaken
- Fuel stored on the site must only be used for the purposes of refuelling IMT facility plant, equipment and locomotives, or as prescribed for WHs JN and JR in accordance with CoC B176A
- Unexpected contamination finds will be managed in accordance with the Unexpected Finds Protocol (Appendix H – Unexpected Finds Protocol).

5.2.1.5. Heritage

Any unexpected heritage finds, Aboriginal and non-Indigenous, will be managed in accordance with the Unexpected Finds Protocol provided as Appendix H – Unexpected Finds Protocol of this OEMP.

5.2.2. Environmental forms

Each Area Manager is required to prepare environmental monitoring or management forms and checklists, relevant to their works. Where forms or checklists have been included within this OEMP or sub-plans, these are indicative and can be replaced with Area Manager-specific forms. The relevant Area Manager must provide environmental and sustainability forms, registers and/or checklists to the Principal's Representative for review prior to commencement of works. The Area Manager-specific forms, registers and/or checklists must include the relevant minimum specific content. At a minimum, the following are to be developed:

- Project induction and training register / records
- Weekly environmental inspection
- Water discharge permit
- Noise and vibration monitoring form
- Air quality monitoring form
- Water quality monitoring form
- Waste tracking spreadsheet
- Energy consumption register
- Water consumption register
- Materials register (including material specifications)
- Corrective actions register
- Incident register

- Complaints form.

6. Monitor and Review

6.1. Monitoring

Environmental monitoring is to be completed to assist in the management of the following:

- Compliance with all statutory approvals and relevant legislative requirements
- The minimisation of occurrence and potential impacts of environmental incidents
- Effectiveness of environmental controls
- Implementation of this OEMP.

Monitoring requirements under the Consolidated Consent are included in the relevant sub-plans. Where relevant, the sub-plan provides detail on the following:

- Responsibility for monitoring
- Relevant standards applicable to the monitoring
- Monitoring technique
- Monitoring location and equipment installation requirements
- Frequency of monitoring
- Sample collection requirements, including chain of custody
- Calibration and maintenance requirements of equipment
- Data management, review and distribution.

Table 6-1 summarises operations monitoring requirements.

Table 6-1 MPW Stage 2 monitoring requirement summary by aspect

Condition or reference	Monitoring requirements	Frequency	Reference document
Noise and Vibration			
B140	Site Operational Noise Monitoring	Within 12 months of operation of the intermodal terminal facility; occupation of the first warehouse, 50% occupation of the site and 100% occupation of the site, or as otherwise agreed by the Planning Secretary	ONMP
FCMM 2B	Ambient noise monitoring surveys	Continuous	ONMP

Condition or reference	Monitoring requirements	Frequency	Reference document
Stormwater			
B38(e)	Monitoring of water quality at sediment basin/ on-site detention/ bioretention basin outlet channels and piped outlets discharging to the Georges River	*To be updated upon finalisation of SQMP*	SQMP
Air Quality			
B47A(d)	Monitoring all emission sources associated with site operation	To be updated upon finalisation of OAQMP	OAQMP
Traffic and Access			
B119	Main gate monitoring (e.g. CCTV) to identify heavy vehicles turning right from the terminal site onto Moorebank Avenue, or turning left from Moorebank Avenue to the terminal site	To be updated upon finalisation of OTAMP	OTAMP Biannual Trip Origin and Destination Report

6.1.1. Interface of operation and construction areas

As detailed in Section 1.5, construction and operation of the Development will be progressive, and as such, operational areas will be adjacent to construction areas. The construction areas will be delineated by fencing and will be subject to the approved CEMP. The relevant Area Manager should consider the construction activities occurring in proximity to the operational area when monitoring their area of responsibility. If the Area Manager suspects that construction activities are affecting the compliance obligations of this OEMP, they will report to the Asset manager/ Development Manager who should then negotiate with the Environmental Manager of the construction area in order to implement appropriate mitigation measures.

6.2. Reporting

Environmental monitoring identified in Table 6-2 and ongoing compliance with the Consolidated Consent and the EPBC Approval, is required during operations. Table 6-2 provides a summary of the various reporting requirements and the frequency of submission of reports to the various regulatory authorities, including DCCEEW.

Table 6-2 MPW Stage 2 reporting requirement summary

Item	Reporting requirements	Frequency
B139	Noise Monitoring report for Mechanical Plant	Within two months of commencement of operation of the IMT facility and occupation of each tenancy
B140	Site Operational Noise Report	Within 60 days of completion of noise monitoring
B140A (e)	Copy of the results of the noise survey	Within one month of completion of the survey/s
B140A (f) ix	Residual Noise Impact Report	Within three months of the attended noise survey/s
B140A (i)	Noise mitigation reports and plans, and summaries of the state of agreements reached with property owners, and the execution of at source, in transmission pathway and at receiver mitigation	Every 6 months commencing from the completion of the Residual Noise Impact Mitigation Plan and Proposal for At Property Noise Mitigation Plans until all mitigations are completed
B143	Rail Noise Monitoring Report	Annually for a period of 5 years from commencement of operation, or as otherwise agreed by the Planning Secretary
B122	Annual report on employee numbers	One year after commencement of operation of the IMT facility and for up to 5 years from occupation of the final warehouse
B120	Biannual Trip Origin and Destination Report	Within one month of its preparation, each six months following commencement of operation
B179	Pre-Occupation Report (dangerous goods)	Prior to occupation of each premises and each new occupation
B36(e)	Maintenance reports, detailing the results of quarterly inspections, inspections after major rainfall events, and maintenance activities	Quarterly
B36(f)	Recording results of water quality monitoring	*In accordance with the SIOMP/SQMP*

6.2.1. Management review and continuous improvement

LOGOS will annually review the adequacy of the environmental and sustainability controls, procedures objectives and targets within this OEMP. This enables LOGOS to determine whether the controls are still applicable to operations and to track progress against the objectives and targets.

- The review will address, as a minimum:
- Phasing of operation, as more warehouses are constructed
- Changes in maintenance/ operational activities
- Environmental monitoring outcomes
- Progress against objectives and targets
- Changes required to address incidents and non-conformances
- Changes in organisational structure and responsibilities
- Changes in standards and legislation
- Changes in relevant sub-plans
- Community feedback identifying issues with operation
- Any Regulatory Agency or Council input/requirements or response from DPHI
- Any third-party land holder inputs or requirements.

The management review is to be documented and changes to the plan made by LOGOS Site HSE Manager.

Minor updates (i.e. those which do not impact on compliance with the Consolidated Consent or the EPBC Approval) will be undertaken by LOGOS as appropriate and updates may include consultation with relevant Authorities and tenants. These changes would be reviewed and approved by the LOGOS Site HSE Manager.

If required, an Accordance Assessment will be prepared by the Principal's Representative to assess the proposed change to satisfy LOGOS that the change is in compliance/accordance with the documents listed in CoC A3.

6.2.2. Compliance Reporting

In accordance with CoC C14, an Operational Compliance Monitoring and Reporting Program will be developed no later than six weeks before the date notified for the commencement of operation. The current MPW S2 CMRP, prepared prior to the commencement of construction, will continue to apply to the Development for both construction and operations.

Compliance Reports are to be carried out in accordance with the Compliance Reporting Post Approval Requirements.

6.3. Auditing and Inspections

6.3.1. Audit requirements

Environmental and sustainability audits are to be undertaken in accordance with the EMS, CoC and Green Star requirements. These audit requirements are detailed in Table 6-3.

Audits will be undertaken in accordance with ISO 19011 – Guidelines for Auditing Management Systems. Under section 458 of the EPBC Act, DCCEEW may also undertake an audit or require that an independent audit is undertaken to verify compliance with the CoA.

Table 6-3 MPW Stage 2 audit summary

CoC/CoA	Audit requirements	Frequency	Scope and dissemination
B51	4-star Green Star Certification	For warehouse design, construction and operation. Designed assessment expires 3 years after the date of the issue of Designed Assessment Certificate. Certified ratings have unlimited validity period.	Green Building Council Australia has the right to conduct audits of the Applicant's advice to its employees, consultants and contractors regarding the Applicant's commitment to this Agreement. Green Star assesses and rates buildings against a range of environmental impact categories that align with Sustainable Development Goals including: Encourages solutions that address the social health of the community. Leading projects to set a strategic direction and enhance the industry's capability to innovate. Deliver new natural corridors and green spaces in cities. Support the creation of safe, enjoyable, inclusive and comfortable places that are integrated into the broader urban fabric and enable communities to connect and thrive. Positive contribution by focusing on carbon, water consumption and the impact of materials. Resilient behaviour toward short term shocks and long term stresses. Mental and physical health improvement Responsible manner of design, procure, build and hand over. Assess management, indoor air quality, energy, transport water, materials, land use and ecology, emissions and innovation.
B112A	Pre-opening Road Safety Audit	Prior to occupation of any warehouse on the site	Heavy vehicle movements associated with operation in and out of the Development site. Motorists and construction vehicle movements along Moorebank Avenue.

CoC/CoA	Audit requirements	Frequency	Scope and dissemination
B112B	Interim Operational Site Access Road Safety Audit traffic management measures	Prior to occupation of any warehouse on the site	Incorporate the corrective actions outlined in the pre-opening Road Safety Audit required under condition B112A in consultation with and with the prior approval of the relevant road authority.
B112C	Road Safety Audit not required according to condition B112A	Prior to occupation of any warehouse on the site	Audit not required if the applicant has completed the Moorebank Avenue and Anzac Road intersection upgrades required under Condition B84 prior to occupation of any warehouse on the site.
B120A B120B	Traffic Audit	Within 90 days of the following trigger events: The MPW Stage 2 daily heavy vehicle movements reaching 1,000 heavy vehicles movement for the first time. Annual container freight throughout on the MPW Stage 2 site reaching each of the following: 50,000 TEU, 250,000 TEU and 500,000 TEU. As may be directed by the Planning Secretary from time to time.	Verification of actual traffic movements against condition A15 Assessment of the traffic performance of the project against the predictions made in EIS, RtS and consolidated assessment clarification responses Consideration of the results of the traffic monitoring during a representative period nominated by the auditor Review of compliance with the approved access routes and performance measures prescribed under this consent Consideration of any traffic-related issues raised by TfNSW and Council Findings and recommendations with respect to the traffic performance of the project and any additional measures that may be required to manage traffic associated with the project.
B176D	Hazard Audit	Twelve months after commencement of operations and every five years thereafter or at such intervals as Council may agree	Consistent with the Department's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines' Accompanied by a program for the implementation of all recommendations made in the audit report. If the deferral of the implementation of a recommendation is intended, reasons must be documented.

CoC/CoA	Audit requirements	Frequency	Scope and dissemination
C16	Independent Audit Program	No later than one month before operation - Once off	In accordance with the Independent Audit Post Approval Requirements.
C18	Independent Environmental Audit	In accordance with the Independent Audit Post Approval Requirements (Department 2018)	Reviews adequacy of any approved strategy, plan or program required under the approvals Recommend measures or action to improve the environmental performance of the Facility, and/or any strategy, plan or program required under the approvals Report required within 60 days of commissioning the audit Final audit report and responses will be published on the website.

6.3.2. Inspections

Table 6-4 provides a summary of the inspections to be completed during operations.

Table 6-4 MPW Stage 2 inspection summary

Condition	Monitoring Requirement	Focus	Frequency	Record
B36(b) & (c)	Inspections of scour/ bank protection structures Routine checking of water quality devices in accordance with manufacturers recommendations	Stormwater	Quarterly and after major rainfall events	SIOMP
B82	Inspection for replacement plantings for shrubs and trees which fail at an equivalent pot size or larger	Biodiversity	To be updated upon finalization of LVMP	LVMP
B83(b)	Inspect pest and weed control measures and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area	Biodiversity	Regular Basis	OFFMP

Condition	Monitoring Requirement	Focus	Frequency	Record
FCMM 3F	Visual inspection to reject excessively smoky trucks visiting site	Air Quality	Daily	OAQMP

6.4. Non- conformance and Non- compliance

6.4.1. Non-conformance

Non-conformances are observations that are not in accordance with the OEMP and/or the sub-plans. These are not recorded as non-compliances as there may be activity-specific justification for a change in implementation of the requirements of the management plan.

Where a non-conformance is also considered to represent a possible non-compliance, it is to be recorded as a potential non-compliance. Depending upon the nature of the non-conformance, the non-conformance may require reporting to the DPHI as an incident – CoC C10.

It is the responsibility of all personnel to report non-conformances to LOGOS. The LOGOS Site HSE Manager and/or Development Manager will investigate non-conformances, log corrective and/or preventative actions, and delegate responsibility for corrective and/or preventative actions within assigned timeframes.

Non-conformances with the implementation of the OEMP and sub-plans will be recorded and addressed by logging the issues within the Development Corrective Actions Register and handled in accordance with the Environmental Management System – Corrective and Preventative Action.

6.4.2. Non-compliance

A non-compliance as defined in the Consolidated Consent is “an occurrence, set of circumstances, or development that is a breach of this consent”. An incident may or may not cause a non-compliance, however, if reported as an incident it does not require reporting as a non-compliance. Non-compliances may also arise where an occurrence, set of circumstances or development is considered to be in non-accordance with the EPBC Approval REMM, FCMM or RMMM. Incident response, classification and notification requirements are outlined in Section 4.9.

Potential non-compliances with the Consolidated Consent can be identified by anyone and are to be reported to the LOGOS Site HSE Manager as a potential non-compliance. Whether the occurrence, set of circumstances, or development requires to be notified to the DPHI as a non-compliance is the responsibility of the Project and/or Development Managers.

Non-compliance with the Consolidated Consent will be reported in a Non-Compliance Report (NCR) and any corrective and/or preventative actions will be recorded within the Project Corrective Actions Register and handled in accordance with the Environmental Management System – Corrective and Preventative Action. Non-compliances shall be recorded and addressed through Aconex.

LOGOS will notify DPHI in writing to compliance@planning.nsw.gov.au within seven days after it becomes aware of any non-compliance – in accordance with CoCs C11 and C12. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply, the reasons the non-compliance occurred (if known), and what actions have been, or will be, undertaken to address the non-compliance.

Documentary evidence providing proof of the date of publication and non-compliance with any of the CoAs must be provided to DCCEEW at the same time as the compliance report is published.

All leases on site will require tenant compliance with the OEMP, including the implementation of corrective actions and reasonable directions from LOGOS in relation to compliance with the Consolidated Consent, EPBC Approval and OEMP requirements.

6.5. Document Control and Records

LOGOS employees, warehouse tenants and contractors are responsible for maintaining legible environmental records to demonstrate compliance with this OEMP, including where relevant:

- All monitoring and inspection reports
- Internal and external audit reports
- Reports of pollution incidents, environmental non-conformances and follow-up actions
- Reports of environmental complaints and follow-up action
- Minutes of management review meetings, and actions required as a result
- Induction and training records.

All documentation, including environmental records, is to be controlled in accordance with the LOGOS WHS Management System document control system and the MPW Stage 2 contractual requirements. Documents are to be forwarded to LOGOS using Aconex – the primary Document Control System during operations. Aconex is to be used to store records, documents, and plans as a minimum.

Warehouse tenants are to make all relevant records available for inspection by LOGOS and/or the environmental auditor where necessary.

Appendix A – Compliance table

EP&A Act Approval

The MPW Stage 2 was approved under Part 4, Division 4.7 of the EP&A Act. The MPW S2 (SSD 7709) CoC include requirements to be addressed in this OEMP. These requirements and where they are addressed within OEMP are provided in Table A-1 below.

Table A-1 MPW S2 (SSD 7709) CoC requirements

Condition	Requirement	Reference
A2	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Section 4 of this Operational Environmental Management Plan (OEMP)
A3	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) in accordance with the EIS, Response to Submissions (RtS) and Consolidated assessment clarification responses; and (d) in accordance with the management and mitigation measures in Appendix 2.	This OEMP Appendix A
A4	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in condition A4(a).	Noted
A5	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in Conditions A3(c) – (d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Conditions A3(c) – (d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Noted

Condition	Requirement	Reference
A13	The container freight throughput for MPW must not exceed 500,000 TEU p.a.	Operational Traffic and Access Management Plan (OTAMP)
A14	Containers that are transferred between the site and Port Botany must be transferred by rail, unless there is planned track maintenance or where unforeseen circumstances have occurred (e.g. an incident, breakdown, derailment or emergency maintenance on the rail line).	OTAMP
A15	The transfer of containers between Port Botany and the intermodal terminal facility must not commence until the rail connection to the Southern Sydney Freight Line is operational.	Note. Rail connection to Southern Sydney Freight Line is under construction.
A15A	The development must not generate more than: (a) 2,670 light vehicle movements a day during operation; and (b) 1,654 heavy vehicle movements a day during operation.	OTAMP
A15B	The applicant must keep accurate records of the number of heavy and light vehicles entering and leaving the site each day. These records must be provided to the Planning Secretary upon request, and to the approved traffic auditor upon the trigger events in B120B occurring and prior to the commencement of the Traffic Audit required under condition B120A.	OTAMP
A16	The maximum GFAs for the following uses apply: (a) 215,000m^2 for the warehousing and distribution facilities; and (b) 800m^2 for the freight village.	Urban Design Development Report (UDDR)
A16A	Warehousing associated with the development is to be limited to the area identified in the plan titled 'Precinct Modification Plan — Proposed' (Drawing No JR-SK-A-0-9402, Revision H), prepared by Bell Architecture and dated 26 November 2020).	This OEMP MPW S2 UDDR

Condition	Requirement	Reference
A17	The warehousing and distribution facilities must only be used for activities associated with freight using the either the MPE or MPW rail intermodal terminal.	Noted
A18	Notwithstanding Condition A17, movements of containers between a rail intermodal terminal on either MPE and MPW site, and a warehouse on either the MPE or MPW site, are permitted where those movements are also approved for MPE.	Noted
A19	For the avoidance of doubt, nothing in this consent permits: (a) the occupation or use of a warehouse and/or distribution facility on the site before the commencement of operation of either the MPE or MPW rail intermodal terminal; or (b) truck-to-truck movements.	Noted
A20	Freight village tenants and occupations are restricted to those activities that provide: (a) ancillary support for the development, its tenants, worker population and visitors; (b) a nexus with activities undertaken in relation to the warehouse, logistics functions of the IMT development and/ or; (c) provide aligned services to the intermodal functions.	Noted, to be addressed in future versions of the UDDR and this OEMP
A28	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and (b) provide details of the consultation undertaken in the document submitted to the Planning Secretary including: (i) the outcome of that consultation, matters resolved and unresolved (and the justification for matters remaining unresolved); and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Relevant sections of sub-plans
A41	Unless stated otherwise, the Applicant must submit strategies, plans and programs required under this consent to the Planning	Noted

Condition	Requirement	Reference
	Secretary at least one month prior to commencement of construction or operation.	
B36	Prior to commencement of operation, the Applicant must prepare a Stormwater Infrastructure Operation and Maintenance Plan to manage the operation and maintenance of stormwater infrastructure on-site and off-site, to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required under Condition C5 and must be implemented for the life of the assets and must include provision for: (a) the management and maintenance of the assets, including evidence that a maintenance contract is in place with a reputable and experienced maintenance contractor; (b) quarterly inspections, and inspections after major rainfall events including scour/ bank protection structures; (c) schedule for routine checking (at least quarterly), cleaning and servicing of all water quality devices/ systems in accordance with the manufacturer's and/ or designer's recommendations; (d) maintenance of records of all maintenance activities undertaken; (e) preparing quarterly maintenance reports, detailing the results of quarterly inspections, inspections after major rainfall events, and maintenance activities; (f) recording results of water quality monitoring required under Condition B38; (g) investigation, management and mitigation of water quality target exceedances; (h) requiring annual independent auditing; and (i) procedures for submission of the quarterly maintenance reports and annual independent audit reports to the Planning Secretary, including the results of inspections, management and maintenance actions and water quality monitoring.	Stormwater Infrastructure Operation Management Plan (SIOMP)
B38	Prior to commencement of operation, the Applicant must prepare a Stormwater Quality Monitoring Program in consultation with Council and the EPA. The program must form part of the OEMP required under Condition C5, be implemented for the life of the development and include the following: (a) base line water quality data; (b) monitoring parameters;	Stormwater Quality Management Plan (SQMP)

Condition	Requirement	Reference
	(c) water quality assessment criteria; (d) receiving water quality monitoring sites in Anzac Creek and upstream and downstream of the site in the Georges River; (e) monitoring of water quality at sediment basin/ on-site detention/ bioretention basin outlet channels and piped outlets discharging to the Georges River; (f) frequency of sampling, including wet weather sampling; (g) method of sampling and analysis; (h) assess water quality and quantity performance for construction discharges and ongoing stormwater discharges from the development to ensure protection of the desired ecological values of Anzac Creek; and (i) include sampling locations and the frequency of sampling including wet weather sampling.	
B46	The Applicant must ensure dust emissions generated by the development do not cause exceedances of the following criteria at private property not associated with the development: (a) 2 g/m^2/month maximum increase in deposited dust level; and (b) 4 g/m^2/month maximum deposited dust level.	Operational Air Quality Management Plan
B51	The Development must be designed and operated to meet minimum 4 star Green Star certification by the Green Building Council of Australia for warehouse design, construction and operation	Section 6.3 of this OEMP
B76	Operational lighting must: (a) comply with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) be designed to reduce light spill and be mounted, screened and directed in such a manner that it does not create a nuisance and minimises visual impacts to surrounding properties, the public road network, the Georges River riparian corridor and the Boot Land.	Section 5.2 of this OEMP Appendix G – Light spill management
B77	The following signage is not permitted: (a) general advertising or moving or flashing signs;	UDDR

Condition	Requirement	Reference
	(b) west facing illuminated building signage visible from residences; and (c) internally illuminated signs that are visible from residences.	
B82	Prior to commencement of operation, the Applicant must prepare a Landscape Vegetation Management Plan (LVMP) and submit it to the Planning Secretary for approval. The LVMP must be prepared by a suitably qualified and experienced person(s) and form part of the OEMP required under Condition C5. The LVMP must include: (a) an inspection and maintenance schedule and require replacement plantings for shrubs and trees which fail at an equivalent pot size or larger; and (b) graffiti management.	Landscape Vegetation Management Plan (LVMP)
B88	Road design must incorporate any structures for fauna movement between the Georges River riparian corridor and the Boot Land, either under or below the road, that have been identified by the Management Plan as required under Condition B152.	MPW Stage 2 Koala Management Plan (Cumberland Ecology, 2020)
B89	Heavy vehicles used for haulage of imported fill or freight must not use Cambridge Avenue during construction and operation of the development.	OTAMP
B90	Access to the ABB site must be maintained throughout construction and operation of the development.	OTAMP
B91	The Applicant must: (a) consult with the owners/occupiers of the ABB site throughout construction and operation; (b) provide details of construction works adjacent to the ABB site prior those works occurring; and (c) ensure the proposal does not adversely impact overland flow paths or existing stormwater infrastructure on the ABB site.	OTAMP
B92	The Applicant must ensure that the construction and operation of the proposed development will not prevent the public use of	OTAMP

Condition	Requirement	Reference
	Moorebank Avenue to a standard commensurate to its use prior to the development.	
B93	The development is to be designed and operated so that: (a) all vehicles are wholly contained on site before being required to stop; (b) adequate parking for heavy vehicles is provided on-site to accommodate any potential delays in schedule time; (c) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site; (d) all loading and unloading of materials are carried out on-site; and (e) site roads accommodate buses, bus infrastructure and cyclist use for employees.	OTAMP
B104	The Applicant is to ensure that the construction and operation of the proposed development will not prevent the ongoing use of Moorebank Avenue as a public road to a standard commensurate to its current use prior to the development. A staging plan should be submitted to RMS for approval, as part of the WAD package, to ensure adequate capacity is provided along Moorebank Avenue at all times, including a requirement to maintain two lanes open to traffic. The staging plan should provide details of how the road and intersection upgrade works tie into other road upgrades works approved under the MPE Stage1 and 2 SSD applications. Any temporary diversion works not located within the Moorebank Avenue roadway will require separate planning approval.	OTAMP
B118	Prior to commencement of operation, the Applicant must prepare an Operational Traffic and Access Management Plan (OTAMP) and submit it to the Planning Secretary for approval. The OTAMP must be prepared by a suitably qualified and experienced person(s) in consultation with Council(s), TfNSW and RMS	OTAMP
B119	The OTAMP must form part of the OEMP and, in addition to general management plan requirements listed in Conditions C5 and C6. The OTAMP must: (a) detail numbers and frequency of truck movements, sizes of trucks, vehicle routes and hours of operation; (b) detail access managements for the site to ensure road and site safety, and demonstrate there will be no queuing on the road network;	OTAMP

Condition	Requirement	Reference
	(c) detail measures to ensure turning areas and internal access roads are kept clear of any obstacles, including parked cars, at all times; and (d) set out a framework and procedures for data collection required to prepare the Biannual Trip Origin and Destination Report required under Condition B120 including a main gate monitoring system (e.g. CCTV) to identify heavy vehicles turning right from the terminal site onto Moorebank Avenue, or turning left from Moorebank Avenue to the terminal site.	
B120	Each six months following commencement of operation, the Applicant must prepare a Biannual Trip Origin and Destination Report (in a format agreed with TfNSW and RMS) that advises: (a) the total number of actual and standard twenty foot equivalent shipping containers despatched and received during the period; (b) the number of actual and standard twenty foot equivalent shipping containers transported to and from the site by rail during the period; (c) actual hours of operation for the truck gate listing days and hours of operation; (d) records of vehicle numbers accessing the site including a record of heavy vehicle entry by date and approximate time; (e) direction of travel into and out of the site for light vehicle on a representative day; and (f) representative vehicle origins and destinations of all classes of vehicles and covering the intermodal terminal, the warehousing facility and any other uses such freight village.	OTAMP
B121	Prior to the issue of any Occupation Certificate, the Applicant must prepare a specific Workplace Travel Plan and submit it to the Planning Secretary for information. The Workplace Travel Plan must be developed in consultation with TfNSW and outline facilities and measures to promote public transport usage, including: (a) peak period and shift work responsive express buses to/ from the site and Liverpool Station via Moorebank Avenue and Newbridge Roads with frequency dependent on the development of the site; (b) peak period express buses to/ from the site and Holsworthy rail station via Anzac Road, Wattle Grove Drive and Heathcote Road with frequency dependent on the development of the site; and	OTAMP Tenancy-specific Workplace Travel Plans will be prepared as required.

Condition	Requirement	Reference
	(c) consideration of extension of the 901 bus service and new bus stop locations if required.	
B122	The Applicant must provide an annual report on employee numbers to the Department, TfNSW and RMS, commencing one year after commencement of operation of the IMT facility and for up to 5 years from occupation of the final warehouse building.	Section 6.2 of this OEMP
B123	The Applicant and each occupant/ operator must implement the most recent version of the Workplace Travel Plan for the duration for the development.	Noted
B130	The permitted hours of operation are detailed in Table 3	Operational Noise Management Plan (ONMP)
B131	The noise generated by the development must not exceed the noise limits in Table 4 which are generated by the overall precinct operations (defined as all activities approved for MPW and MPE).	ONMP
B132	Terminal and rail port shuttle operations must comply with the following: (a) best practice plant of the intermodal terminal facility, including electronic automated container handling equipment or equipment with equivalent sound power levels; (b) locomotives using the development must meet the air emissions standards and noise requirements as specified in the Moorebank Precinct East – Stage 1 Project: Best Practice Review (SSD 12-6766) (c) wagons using the development must incorporate available best practice noise technologies, such as “one-piece” freight bogies or three-piece freight bogies fitted with cross-bracing or steering arms; and permanently coupled ‘multi-pack’ steering wagons using Electronically Controlled Pneumatic (ECP) braking with a wire based distributed power system (or better practice technology); (d) automatic rail lubrication equipment must be used in accordance with ASA Standard T HR TR 00111 ST Rail Lubrication and top of rail friction modifiers, where required; and (e) the rail cross sectional profile must be maintained in accordance with ETN-01-02 Rail Grinding Manual for Plain Track	ONMP

Condition	Requirement	Reference
	to ensure the correct wheel/rail contact position and hence to encourage proper rolling stock steering.	
B133	For all terminal and rail operations, a monitoring and performance management regime is to be established in accordance with the conditions of this consent, including but not limited to the requirements of conditions B140-B143, with the objective of ensuring there is no deterioration in noise performance and continual improvement in rail noise outcomes from rail operations throughout the life of the development.	ONMP
B136	Prior to commencement of operation, the Applicant must prepare an Operational Noise Management Plan (ONMP) and submit it to the Planning Secretary for approval. The ONMP must be prepared by a suitably qualified and experienced person (s).	ONMP
B137	The ONMP must for part of the OEMP and, in addition to the general management plan requirements listed in Conditions C5 and C6, the ONMP must include monitoring and reporting as required under Conditions B139, B140 and B141.	ONMP
B139	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 operation/occupation of the freight terminal, freight village and 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 Planning Secretary within two months of operation of freight terminal and occupation of each tenancy to verify predicted mechanical plant and equipment noise levels.	ONMP
B140	Within 12 months of operation of the intermodal terminal facility; occupation of the fire warehouse, 50% occupation of the site and 100% occupation of the site, or as otherwise agreed by the Planning Secretary, the Applicant must undertake Operational Nosie Monitoring to compare actual noise performance of the project against predicted noise performance and prepare an operational Noise Report to document this monitoring. The Report must include, but not necessarily be limited to: (a) noise monitoring to assess compliance with the predicted operational noise levels and the noise limits specified in Table 4; (b)a validation by predictive modelling of the operational noise levels in terms of criteria and noise goals established in the Road Noise Policy (RNP, EPA, 2011);	ONMP

Condition	Requirement	Reference
	(c) sleep disturbance impacts compared to those determined in documents specified under Condition A3; (d) impacts associated with annoying characteristics such as prominent tonal components, impulsiveness, intermittency, irregularity and dominant low-frequency content; (e) methodology, location and frequency of noise monitoring undertaken, including monitoring sites at which project noise levels are ascertained, with specific reference to locations indicative of impacts on sensitive receiver; (f) any required recalibrations of the noise model taking into consideration factors such as actual traffic numbers and heavy vehicle proportions; (g) an assessment of the performance and effectiveness of applied noise mitigation measures together with a review and if necessary. Reassessment of all feasible and reasonable mitigation measures; (h) identification of additional measures to those predicted in document specified under Condition A3 that would be implemented with the objective of meeting the criteria outline in the RNP and NPI (EPA. 2007), including timing of implementation; (i) details of any complaints and enquiries received in relation to operational noise generated by the project between the date of commencement of operation and date the report was prepared; and (j) procedures for the management of operational noise and vibration complaints, The operational noise report is to be verified by a suitably qualified and experienced noise and vibration expert. The operational noise report must be submitted to the Planning Secretary and the EPA within 60 days of completing the operational noise monitoring referred in in (a) above or as otherwise agreed by the Planning Secretary.	
B141	The Applicant must install and maintain a rail noise monitoring system on the rail link at the commencement of operation to continuously monitor the noise from rail operations on the rail link. The system must capture the noise form each individual train passby noise generation event, and include information to identify: (a) time and date of freight train passbys;	ONMP

Condition	Requirement	Reference
	(b) imagery or video to enable identification of rolling stock during the day and night; (c) LAeq (15 hour) and LAeq (9 hour) from rail operations; and (d) LAF (max) and SEL of individual train passbys, measured in accordance with ISO3095; OR (e) other alternative information as agreed with or required by the Planning Secretary. The results from the noise monitoring system, must be publicly accessible from a website maintained by the Applicant. The noise results from each train must be available as live data on the website, unless unforeseen circumstances (i.e. a system malfunction) have occurred. The LAeq (15 hour) and LAeq (9 hour) results from each day must be available on the website within 1 hour of the period ending.	
B142	Prior to the commencement of operation, the Applicant must submit to the Planning Secretary for approval, justification supporting the appropriateness of the location for rail noise monitoring, including details of any alternative options considered and reasons for these being dismissed. The noise monitoring location(s) must be west of the MPW Stage 2 connection to the rial link constructed under the MPE Stage 1.	ONMP
B152	Prior to clearing of native vegetation, a Koala Management Plan (KMP) must be prepared by a suitably qualified person in consultation with OEH and be submitted to the Planning Secretary for approval. The KMP must; (a) make reference to A review of koala tree users across New South Wales (OEH 2018) (b) identify habitat corridors, of adequate dimensions to provide an adequate Koala habitat corridor as supported by a Koala specialist, to provide connectivity both within the Intermodal Precinct area and with other core koala habitat areas (i.e. to the south and to the west along Georges River); (c) include commitment to retain Koala use trees on site in line with phased earthworks (see e.g. Condition B40); (d) include details of structure to eliminate barries to movement (presented by fences, roads, drainage culverts or pits, rai lines and the like) for koalas ands other native fauna likely to use the site or habitat corridor; (e) include details on koala habitat rehabilitation/restoration within the identified habitat corridors; and	MPW Stage 2 KMP (Cumberland Ecology, 2020)

Condition	Requirement	Reference
	(f) include other measures to minimise risk of harm to koalas.	
B160	Prior to commencement of operation an Operational Flora and Fauna Management Plan (OFFMP) must be prepared by a suitably qualified person in consultation with OEH and be submitted to the Planning Secretary for approval. The OFFMP must include: (a) monitoring, management and maintenance procedures for koala habitat corridors; and (b) management and maintenance of other measures and site operations to minimise the risk of harm to koalas and other native fauna.	Operational Flora and Fauna Management Plan (OFFMP)
B176	The total quantities of dangerous goods present at any time within the development and transport movements to and from the development must be kept below the screening threshold quantities and movements listed in the Department's Hazardous and Offensive Development Guidelines Applying SEPP 33 (January 2011), with the exception of dangerous goods storage for Warehouses JR and JN.	Section 3.3 of this OEMP
B176A	The storage of dangerous goods and combustible materials within Warehouses JR and JN must not exceed the maximum storage quantities listed in Table 7 at all times	Section 3.3 of this OEMP
B177	The Applicant (the operator/ occupant of each premises) must store and handle all chemicals, fuels and oils, including Dangerous Goods as defined in the Australian Code for the Transport of Dangerous Goods by Road & Rail, in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participant's Manual if the chemicals are liquids. In the event of an inconsistency between the requirements listed above in (a) and (b), the most stringent requirement must prevail to the extent of the inconsistency.	Section 3.3 of this OEMP
B178	Fuel stored on the site must only be used for the purposes of refuelling IMT facility plant and equipment and locomotives.	Section 5.2 of this OEMP

Condition	Requirement	Reference
B179	Prior to the occupation of each premises and in each instance of occupation by a new occupant, a statement must be submitted to the Planning Secretary confirming that the premises will be operated so as to comply with the requirements of Conditions B176 and B177.	Section 6.2 of this OEMP
B180	The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	Section 5.2 of this OEMP
B183	The OEMP required under Condition C5 must include measures for waste management in accordance with the waste hierarchy set out in the EPA's NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.	Section 5.2 of this OEMP
B187	The container wash down facility must: (a) include bunding to exclude wash area waste from the stormwater system; (b) be designed and operated to avoid overspray from foams, detergents, mud or fugitive emissions outside wash down bays; (c) include oily water separation, water treatment and recycling; and (d) comply with Sydney Water trade waste requirements for discharge to the sewer.	UDDR
B188	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	OAQMP
B191	An updated Bushfire Risk Management Plan must be prepared by a suitably qualified person(s) demonstrating that the bushfire asset protection zones can be contained wholly within the development area and that management of the inner protection zone will not impact on the proposed Biodiversity Offset Area. The Bushfire Risk Management Plan must be submitted to the Planning Secretary prior to construction of permanent built surface works.	Operational Emergency Response Plan (Operational ERP)

Condition	Requirement	Reference
B194	Prior to the commencement of construction and operation, the Applicant must prepare an Emergency Response Plan(s) covering, but not limited to, flooding and bushfire. The Emergency Response Plan(s) must be consistent with Australian Standard AS3745 2010 Planning for Emergencies in Facilities and include details of: (a) assembly points and evacuation routes; (b) evacuation and refuge protocols; and (c) awareness training for employees and contractors.	Operational ERP
B196	Prior to occupancy of any freight village or warehouse tenancy, and every subsequent occupation of these tenancies, details for the tenant and occupation activity is to be submitted to the Planning Secretary demonstrating that the proposed activity complies with Conditions A17 and A20.	Noted
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) detailed baseline data (b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions) (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures (c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the development; (ii) effectiveness of the management measures set out pursuant to paragraph © above; (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	This OEMP

Condition	Requirement	Reference
	(f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; (h) roles and responsibilities for implementing the plan; and (i) a protocol for periodic review of the plan.	
C5	The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of condition C1 and submit it to the Planning Secretary for approval.	This OEMP
C6	As part of the OEMP required under Condition C5 of this consent, the Applicant must include the following: (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 4 of this OEMP
	(b) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	Sections 5 and 6 of this OEMP

Condition	Requirement	Reference
	(c) include the following environmental management plans: (i) Operational Traffic and Access Management Plan (see Condition B118); (ii) Stormwater Infrastructure Operation and Maintenance Plan (see Condition B36); (iii) Stormwater Quality Monitoring Program (see Condition B38); (iv) Landscape Vegetation Management Plan (see Condition B82); (v) Operational Traffic and Access Management Plan (see Condition B118); (vi) Operational Noise Management Plan (see Condition B136); and (vii) Operational Flora and Fauna Management Plan (see Condition B160).	Sub-plans
C7	The Applicant must: (a) not commence operation until the OEMP is approved by the Planning Secretary; and (b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	Section 1.5 of this OEMP
C8	Within three months of: (a) the submission of an incident report under Condition C10; (b) the submission of an Independent Audit under Condition C17; (c) the approval of any modifications of the conditions of this consent; or (d) the issue of a direction of the Planning Secretary under Condition A3(b) which requires a revie, The strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out.	MPW Stage 2 Operational Compliance Monitoring and Reporting Program
C9	If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document	Section 1.5.3 of this OEMP.

Condition	Requirement	Reference
	must be submitted to the Planning Secretary for approval within six weeks of the review.	
C10	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	Section 6.4.2 of this OEMP.
C11	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.	Section 6.4.2 of this OEMP.
C12	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will, undertaken to address the non-compliance.	Section 6.4.2 of this OEMP.
C16	No later one month before the date notified for the commencement of construction and operation, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.	Section 6.3 of this OEMP MPW S2 Operational Independent Audit Program (OIAP)
C17	Independent Audits of the development must be carried out in accordance with: (a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C16 of this consent; and (b) the requirements for an independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).	OIAP
C18	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:	OIAP

Condition	Requirement	Reference
	(a) review and respond to each Independent Audit Report [prepared under Condition C17 of this consent; (b) submit the response to the Department and the Certifying Authority; and (c) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Department and notify the Department in writing at least 7 days before this done.	

Final Compilation of Mitigation Measures

A list of the Final Compilation of Mitigation Measures, relevant to the operation of the Development, are provided in the table below.

Table A-2 MPW Stage 2 Final Compilation of Management Measures

FCMM	Requirement	Reference
1C	The Operational Environmental Management Plan (OEMP), or equivalent, for the Proposal would be based on the following preliminary management plans: Preliminary Operational Traffic Management Plan (POTMP) (Appendix M of the EIS) Air Quality Management Plan (Appendix O of the EIS) Erosion and Sediment Control Plans (ESCPs) and Bulk Earthworks Plans, within the Stormwater Drainage Design Drawings (Appendix R of the EIS). As a minimum, the OEMP would include the following sub-plans: Operational Traffic Management Plan (OTMP) Operational Noise and Vibration Management plan (ONVMP) Air Quality Management Plan Flooding and Emergency Response Plan (FERP) Groundwater Monitoring Program Long term Environmental Management Plan (LTEMP) Pollution Incident Response Management Plan (PIRMP), including Spill Management Procedure, prepared under the EPA's Environmental Guidelines: Preparation of Pollution Incident Response Management Plans (EPA, 2012) Fire Safety and Evacuation Plan Community Information and Awareness Strategy Flora and Fauna Management Plan Emergency Vehicle Response Plan.	This OEMP
1D	The Operational Traffic Management Plan would be prepared based on the Preliminary Operational Traffic Management Plan (Appendix M of the EIS) and include the following key initiatives: Heavy vehicle route management Safety and amenity of road users and public	OTAMP

FCMM	Requirement	Reference
	Congestion management on Moorebank Avenue Road user delay management Information signage, distance information and advance warning systems Driver code of conduct Incident management Traffic monitoring.	
1E	Consultation with TfNSW would be conducted regarding the provision for active transport to/from the Proposal site and along the internal perimeter road, as part of detailed design for the Proposal.	OTAMP
1F	Bicycle and end of trip facilities would be provided in accordance with the City of Sydney Section 3 – General Provisions.	OTAMP
1G	Consultation would be undertaken with relevant bus provider(s) regarding the potential to extend the 901 bus service (or equivalent) and additional bus stops with the aim of maximising public transport accessibility to and within the Proposal site.	OTAMP
1I	During operation, emergency vehicle access would be managed through an Emergency Vehicle Response Plan developed for the Proposal in consultation with the NSW Police Force, NSW Fire Brigade, NSW Rural Fire Service and the Ambulance Service of NSW, where appropriate.	OTAMP UDDR
2B	The ambient noise monitoring surveys undertaken within Casula, Wattle Grove and Glenfield would be continued throughout the construction and operation of the Proposal (with annual reporting of noise results up to two years beyond the completion of the Proposal).	ONMP
2C	In the event of any noise or vibration related complaint or adverse comment from the community, noise and ground vibration levels would be investigated. Remedial action would be implemented where feasible and reasonable.	ONMP
2E	Best practice noise mitigation measures would be implemented for the operational phase of the Proposal including: Noise monitoring (refer to mitigation measures 2B and 2C above)	ONMP

FCMM	Requirement	Reference
	A gate appointment system would be implemented to minimise truck loading/unloading wait times and resultant queueing. Trucks would be turned away from facility if arriving too early Truck marshalling lanes would be included to minimise congestion and queueing The provision of information signs and communication of MPW idle reduction policy.	
2G	SIMTA would restrict port shuttle locomotives that do not meet the noise requirements of Environment Protection Licences (EPLs) 3142 and 12208 from entering the MPW Stage 2 rail link.	ONMP
3C	Best practice air quality mitigation measures would be implemented for the operational phase of the Proposal including: Locomotives Ensure locomotives are well maintained in accordance with the manufacturer's specification or relevant operational plan. Update maintenance plans to include a requirement to consider air emissions and where possible improve air emission performance at next overhaul/upgrade (for SIMTA operational fleet) Ultra Low Emitting Switch Locomotives would be considered during the procurement process, having regard to technical, logistical and financial considerations Anti-idle policy and communication / training for locomotive operators Unnecessary idling avoided through driver training and site anti idle policy Driver training for fuel efficiency.	OAQMP
3F	The Air Quality Management Plan (Appendix O of the EIS) would be further progressed and incorporated into the OEMP for the Proposal. In accordance with the AQMP the following key aspects would be addressed in the OEMP: Implementation and communication of anti-idling policy for trucks and locomotives Complaints line for the community to report on excessive idling and smoky vehicles Procedures to reject excessively smoky trucks visiting the site, based on visual inspection.	OAQMP

FCMM	Requirement	Reference
3G	SIMTA would restrict port shuttle locomotives from entering the MPW Stage 2 rail link, that do not meet the following air emissions standards:	OAQMP
4R	The OEMP would include a biodiversity monitoring program designed to detect operational impacts on the Georges River riparian corridor (within the offset site).	OFFMP
4V	The OEMP would include a biodiversity monitoring program designed to detect operational impacts of the Georges River riparian corridor (within the offset site).	OFFMP
4W	A monitoring program would be developed and implemented to measure the performance of revegetation activities in the Georges River riparian zone and associated conservation area.	OFFMP
5F	Stormwater quality improvement devices would be designed to meet the performance targets identified in the Stormwater and Flooding Environmental Assessment (Appendix R of the EIS), and civil design drawings. Maintenance of the bio-retention structures would be in accordance with the maintenance requirements set out in Gold Coast City Council's Water Sensitive Urban Design Guidelines 2007 and would be included in the OEMP	SQMP SIOMP
5G	Operational water quality monitoring is to be carried out and included in the OEMP with the objective of maintaining or improving existing water quality.	SQMP
5H	A Flood Emergency Response Plan (FERP) would be prepared and implemented for the operational phase of the Proposal. The FERP would take into consideration, site flooding and broader flood emergency response plans for the Georges River floodplains and Moorebank area. The FERP would also include the identification of an area of safe refuge within the Proposal site that would allow people to wait until hazardous flows have receded and safe evacuation is possible. The FERP would be prepared in consultation with the State Emergency Service.	Operational ERP
6I	The existing site-wide Long-Term Environmental Management Plan (LTEMP), such as the one established at the completion of Early Works, is to be revised at the completion of the Proposal remediation activities to include protocols for ongoing maintenance and/or monitoring or any long term remedial/mitigation measures to be implemented following completion of the Site Audit Statement.	MPW LTEMP

FCMM	Requirement	Reference
7B	To minimise the risk of leakages involving natural gas, LNG and flammable and combustible liquids to the atmosphere: Appropriate standards for a gas reticulation network, including AS 2944-1 (2007) and AS 2944-2 (2007), would be applied Correct schedule pipes would be used Fire protection systems would be installed as required Access to the Proposal site would be restricted to authorised personnel.	Detailed Design
7C	To minimise the risks of leakage of LNG and flammable liquids during transport: The transport of dangerous goods by road would comply with the Dangerous Goods (Road and Rail Transport) Act 2008 and the Dangerous Goods (Road and Rail Transport) Regulation 2014 Contractors delivering the gas would be trained, competent and certified by the relevant authorities.	Section 3.3 of this OEMP
7D	To minimise hazards associated with venting of LNG: LNG storage would be designed to AS/NZS 1596-2008 standards Access to the Proposal site would be restricted to authorised personnel Adequate separation distances to residencies and other assets would be maintained.	Detailed Design
7E	Storage of flammable/combustible liquids would be undertaken in accordance with AS 1940, with secondary containment in place in a location away from drainage paths.	Section 5.2 of this OEMP
7F	Intermodal terminal facility and warehousing staff involved in the transport and handling of dangerous goods would receive training in the contents of the dangerous goods provisions commensurate with their roles and responsibilities. Training is to be provided and records maintained in accordance with the appropriate competent authority (WorkCover NSW).	Section 3.3 of this OEMP
7G	The 190 KL of diesel fuel (combustible liquids of class C) would be stored on site in separate 97 KL self-bunded containers and would be stored away from other flammable materials of class 3PGI, II or III.	Detailed Design

FCMM	Requirement	Reference
	The manifest threshold quantity under this circumstance is 100 KL for each tank. Refuelling of locomotives is likely to occur on the locomotive shifter, which would catch any spills during the refuelling process. Spill kits would be located in the vicinity of the refuelling location and staff would be trained in the use.	Expansion Master Plan Report- July 2021 A dedicated locomotive provisioning area for refueling will be provided instead of locomotive shifter.
7H	A preliminary risk screening assessment would be undertaken prior to any refuelling activities being undertaken onsite using LPG to ensure compliance with storage requirements (location, tank size and separation distances) under SEPP 33 (specific to the type of fuel to be stored) to maintain acceptable risk levels associated with refuelling procedures.	When triggered
7I	The storage and handling of any LPG or LNG stored within warehouses onsite as part of the Proposal must demonstrate compliance with storage requirements in accordance with the Applying SEPP 33 guideline.	Operational Compliance Reporting and Monitoring Program
8C	The following mitigation measures would be implemented, where reasonable and feasible, for the landscaping of the Proposal: Use of species that are local to the area Use of trees to provide a uniform canopy cover within vegetated Areas Use of local species as understory planting to support and enhance local habitat values Use of seeds collected within the local area for planting to reinforce the genetic integrity of the region, where possible.	Section 6 of this OEMP
12B	The following mitigation measures would be implemented as part of the OEMP (or equivalent) for waste management: Addressing waste management requirements and goals in staff inductions	Section 6.2 of this OEMP

FCMM	Requirement	Reference
	Providing staff access to documentation outlining the facility's waste management requirements Locating recycling bins in kitchen areas beside general waste bins to prevent contamination of recycling Positioning paper recycling bins close to printer / photocopying equipment Establishing bays or containers for recycled waste generated through de-stuffing Minimising general waste bins at desks but providing adequate container and paper recycling to encourage sorting of recyclables Providing adequate bin storage for the expected quantity of waste Waste management planning incorporating principles of the waste hierarchy Selection of materials used in operations with recycled content, low embodied energy and durability Appropriate areas shall be provided for the storage of waste and recyclable material Standard signage on how to use the waste management system and what materials are acceptable in the recycling would be posted in all waste collection and storage areas All waste shall be collected regularly and disposed of at licensed facilities An education programme and on-going monitoring for training personnel to properly sort and transport waste into the right components and destinations.	
12C	Container disposal units would be provided in the area around the diesel re-fuelling station to dispose of used spills kits. These containers would be taken for disposal at an appropriately licensed facility.	Refuelling Procedure (INTS)
13B	The following mitigation measures would be implemented during the operation of the Proposal: A bushfire management strategy, (including a fire safety and evacuation plan) or equivalent, would be prepared as part of the OEMP Management of the landscaped areas within the Proposal site would be undertaken to maintain minimum dry fuels loads	Operational ERP

FCMM	Requirement	Reference
	The width, as required, of the Rail link connection would be maintained in a low fuel state Protocols would be developed for the monitoring of train access/egress during high – catastrophic fire weather days, if required and in accordance with the bushfire management strategy.	
14B	The Operational Environmental Management Plan (OEMP) would include measures to engage with stakeholders and to manage and respond to feedback received during the operation of the Proposal.	Section 1.4 of this OEMP Relevant sections of sub-plans
14C	Security at the Proposal site would include: Fencing around the perimeter of the Proposal site, and potentially the Rail link connection, which is envisaged to include palisade fencing and chain-link fencing along the Moorebank Avenue boundary and chain-link at other location A controlled site access system including electronic truck processing A controlled circuit television (CCTV) security system at key locations including site entrances and along boundaries An integrated telecommunications system which involves connection to all main buildings and structures.	Appendix D – Aspect and impact register UDDR
14D	Written notification would be provided to potentially affected and adjoining landowners prior to commencement of site operations. The manner of notification would be confirmed in the final OEMP for the Proposal.	This OEMP
14E	Measures to engage with stakeholders and to manage and respond to feedback received during operation of the Proposal, including via a complaints register would be provided in the OEMP for the Proposal	Section 1.4 of this OEMP Relevant sections of sub-plans
15A	In addition to features included in the current design, the following mitigation measures (where feasible and reasonable) would be implemented to reduce the potential for urban heat island effects: Solar panels on roofs of warehousing.	UDDR

FCMM	Requirement	Reference
	Cool roofs (selection of materials higher albedo ratings (ratio of irradiance reflected to the irradiance received)).	

EPBC Approval

The EPBC Approval for the Moorebank Intermodal Terminal Project- Concept, Moorebank New South Wales was granted by DotEE (now DCCEEW) in September 2016 (No. 2011/6086). This approval was provided for the impacts on listed threatened species and communities (Sections 18 and 18A of the EPBC Act) and Commonwealth land (Sections 26 and 27A of the EPBC Act).

The operation of the Development will be consistent with the EPBC Approval conditions. The specific conditions and commitments relating to the Development of an OEMP are identified in Table A-3 EPBC approval relevant conditionsbelow.

Table A-3 EPBC approval relevant conditions

Condition	Requirement	OEMP section
4	For the protection of the environment, including listed threatened species and communities, the person taking the action must prepare an operational environmental management plan (OEMP) addressing at least the elements outlined in Conditions 5 to 13. Operations must not commence until all specified OEMP approvals have been obtained in writing, and once approved, the OEMP must be implemented. The OEMP may be prepared in stages, in which case the corresponding stage must be clearly defined, and operations of that stage must not commence until all specified approvals have been obtained in writing.	This OEMP
5	Sections of the CEMP and OEMP relating to traffic must be prepared by a suitably qualified expert and must: a) be consistent with the Traffic, Transport and Access Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 4A to 4Q from Table 7.1 of the finalised EIS that are described as 'mandatory c) explain how all measures 4A to 4Q from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	OTAMP
6	Sections of the CEMP and OEMP relating to noise and vibration must be prepared by a suitably qualified expert and must: a) be consistent with the Noise and Vibration Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	ONMP

Condition	Requirement	OEMP section
	b) incorporate all measures 5A to 5T (CEMP only) and 5U to 5AJ (OEMP only) from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 5A to 5T (CEMP only) and 5U to 5AJ (OEMP only) from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) d) be approved by the Minister or a relevant New South Wales regulator.	
7	Sections of the CEMP and OEMP relating to biodiversity must be prepared by a suitably qualified expert and must: a) be consistent with the Biodiversity Provisional Environmental Management Framework (3 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 6A to 6R, 6T, 6V and 6X from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 6A to 6R, 6T, 6V and 6X from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) include detailed biosecurity protocols, prepared in consultation with relevant New South Wales and Commonwealth biosecurity agencies, in relation to international and interstate container movement e) be approved by the Minister.	OFFMP
8	Sections of the CEMP and OEMP relating to contamination and soils must be prepared by a suitably qualified expert and must: a) be consistent with the Soils and Contamination Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 7A to 7K, and 8A to 8AA, from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 7A to 7K, and 8A to 8AA, from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) in relation to management of PFAS i) be consistent with: • National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013)	Section 5.2 of this OEMP Unexpected Finds Protocol (Appendix H – Unexpected Finds Protocol) MPW PFAS Management Plan

Condition	Requirement	OEMP section
	• Australian and New Zealand Guidelines for Fresh and Marine Water Quality (under the National Water Quality Management Strategy) including the draft default guideline values for perfluorooctanoic acid (PFOS) and perfluorooctane sulfonic acid (PFOA) in freshwater as applied by the state government • relevant Commonwealth environmental management guidance on PFOS and PFOA	
	ii) detail implementation and operational procedures, appropriate to the risk posed by any contamination, including: • roles and responsibilities • management of potential PFAS contaminated sites as yet un-investigated management of areas of known PFAS contamination, including strategies to reduce runoff, dewatering and migration of contamination across and off the proposed site • a contingency action plan for unexpected PFAS contaminant discoveries	
	iii) detail soil, groundwater and surface water PFAS contamination monitoring requirements and testing and disposal procedures appropriate to the risk posed by any contamination	
	iv) include requirements for site validation reports appropriate to the risk posed by any contamination	
	v) include requirements for remedial action plans appropriate to the risk posed by any contamination	
	vi) detail review procedures appropriate to the risk posed by any contamination	
	vii) impose the following performance measures for managing earthworks and the potential for effects to occur due to disturbance of PFAS contaminated soils during construction: • contaminated sediment to be discharged outside the site of the action to be minimised	

Condition	Requirement	OEMP section
	• contaminated waste material, including excavated soil, to be released through dewatering to be handled appropriately to the risk posed by the contamination and disposed of in an environmentally sound manner such that potential for the PFAS content to enter the environment is minimized • contaminated waste material, including excavated soil, with a PFOS or PFOA content above 50 milligrams per kilogram (mg / kg) to be stored or disposed of in an environmentally sound manner, such that PFAS content does not enter the environment • all soil remaining at the site of the action to be suitable for purpose, e) be approved by the Minister.	
9	Sections of the CEMP and OEMP relating to water must be prepared by a suitably qualified expert and must: a) be consistent with the Water Quality, Stormwater and Flooding Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 9A to 9AG from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 9A to 9AG from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	Section 5.2 of this OEMP SQMP SIOMP
10	Sections of the CEMP and OEMP relating to air quality must be prepared by a suitably qualified expert and must: a) be consistent with the Air Quality Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 10A to 10U (CEMP only) and 10V to 10AH and 11A to 11H (OEMP only) from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 10A to 10U (CEMP only) and 10V to 10AH and 11A to 11H (OEMP only) from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed	OAQMP

Condition	Requirement	OEMP section
	d) be approved by the Minister or a relevant New South Wales regulator.	
11	Sections of the CEMP and OEMP relating to Aboriginal heritage must be prepared by a suitably qualified expert and must: a) be consistent with the Aboriginal Heritage Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	Section 5.2 of this OEMP Unexpected Finds Protocol (Appendix H – Unexpected Finds Protocol
12	Sections of the CEMP and OEMP relating to European heritage must be prepared by a suitably qualified expert and must: a) be consistent with the European Heritage Provisional Environmental Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 13A to 13M from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 13A to 13M from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	Section 5.2 of this OEMP Unexpected Finds Protocol (Appendix H – Unexpected Finds Protocol
13	Sections of the CEMP and OEMP relating to visual impacts (including light spill) must be prepared by a suitably qualified expert and must: a) be consistent with the Light Spill Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 14A to 14H from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 14A to 14H from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	Section 5.2 of this OEMP Appendix G – Light spill management

Appendix B – Facility permits and licences register

Table B-1 MPW Permits and licences register

License/ Faulty Permit	Requirement	Commencement Date	Expiry Date	Responsibility
General				
Environment Protection and Biodiversity (EPBC) Act 1999	Operational Compliance Report to determine regular periodic status of compliance against the CoC and the approval to be closed out after completion of operation phases of the MPW Stage 2 Development to which the approval applies.	To be confirmed (commencement of operational works)	N/A	All
Biodiversity				
Biosecurity Act 2015 *(Noxious Weeds Act* 1993 *repealed)*	As an owner/occupier of land, given a weed control notice by a local control authority, or a successor in title to the owner or occupier who has notice of the notice, must not fail to comply with the notice (refer to Division 5, Clause 26).	If required	N/A	All – Noxious weeds to be controlled as specified under the control category.
Pesticides Act 1999	Any possession of pesticides on the site must be authorised through a permit in accordance with Section 12 of this Act. Any application of pesticides in association with the site must be undertaken by a person who is licenced to carry out that type of work in accordance with Part 6 (Section 45) of this Act.	If required	If required	All – Engage suitably qualified pest controller for the site as required.

License/ Faulty Permit	Requirement	Commencement Date	Expiry Date	Responsibility
Contamination				
Contaminated Land Management Act 1997	In accordance with Section 60, the Environment Protection Authority (EPA) must be notified if: • Contaminants exceed thresholds contained in the guidelines or regulations, where contamination has entered or will foreseeably enter neighbouring land, the atmosphere, groundwater or surface water • Contaminants in soil are equal to or exceed guideline levels with respect to the current or approved use of the land • Contamination meets other criteria that may be prescribed by the regulations.	If required	N/A	All – Notification of the EPA will be undertaken, if required.
Protection of the Environment Operations Act 1997	Notify the EPA immediately of pollution incidents where material harm to the environment is caused or threatened, in accordance with Section 148.	If required	N/A	All – Notification of the EPA will be undertaken, if required.
Hazardous Substances				
Dangerous Goods (Road and Rail) Transport Act 2008	In accordance with Section 6, sub-contractors will work under this section for the licensing of vehicles transporting dangerous goods. Copies of permits to be obtained upon engagement of sub-contractors and this register will be updated accordingly.	To be confirmed (commencement of operational works)	To be confirmed	All –Ensure an appropriate licence is held and is in place where any transportation of

License/ Faulty Permit	Requirement	Commencement Date	Expiry Date	Responsibility
				dangerous goods is intended.
Dangerous Goods (Road and Rail) Transport Act 2008	In accordance with Section 7, sub-contractors will work under this section for the licensing of drivers transporting dangerous goods. Copies of permits to be obtained upon engagement of sub-contractors and this register will be updated accordingly.	To be confirmed (commencement of operational works)	To be confirmed	All – License requirements will be obtained and briefed to all relevant operational personnel prior to operation.
Traffic and Transport				
Roads Act 1993	Road occupancy consent/licences under Section 138 of the *Roads Act 1993* are required for any works that disturb the surface of a public road, require works to be carried out in, on or over a public road, or interfere with a structure, work or tree on a public road.	To be confirmed (commencement of operational works)	N/A	All – Ensure all relevant licenses and approvals are sought prior to undertaking works within a public road.
Heritage				
Heritage Act 1977	Notify Office of Environment and Heritage (OEH) (Heritage Division) on discovery of a relic, in accordance with Section 14A.	If required	N/A	All – Notify OEH (Heritage Division)

License/ Faulty Permit	Requirement	Commencement Date	Expiry Date	Responsibility
				on discovery of a relic.
Bushfire				
Rural Fires Act 1997	If hot works are deemed unavoidable, then relevant hot works permits will be obtained by the Contractor under this Act, in accordance with Section 89.	To be confirmed (commencement of operational works)	To be confirmed	All - Permit requirements will be obtained and briefed to all relevant operational personnel prior to and during operation.
Waste				
Protection of the Environment Operations Act 1997	Waste is to be transported to a facility that can lawfully accept the waste, in accordance with Section 143.	To be confirmed (commencement of operational works)	To be confirmed	All – A s143 Agreement Notice and proof of waste classification must be provided prior to the acceptance of material at the Facility.

Appendix C – Guidelines and Codes of Practice

The table below addressed the guidelines, code of practices and other documents utilised in preparation of the sub-plans of this OEMP.

Table C-1 Guidelines, codes of practices and other documents utilized in preparation of the sub-plans of this OEMP

Plan	Document
Operational Environmental Management Plan (OEMP)	Environmental Management Plan Guideline – Guideline for Infrastructure Projects, NSW Department of Planning, Industry and Environment, 2020
Operational Emergency Response Plan (OERP)	Australian Emergency Manuals Series, Manual 20: Flood Preparedness, Commonwealth of Australia 2009 Australian Emergency Manuals Series, Manual 21: Flood Warning, Commonwealth of Australia 2009 Australian Emergency Manuals Series, Manual 22: Flood Response, Commonwealth of Australia 2009

Appendix D – Aspect and impact register

The following risk assessment matrix has been used to determine the risk of each individual environmental aspect relevant to the Operation of the Development. The level of risk determined from the matrix identifies the level of control measures required for that environmental aspect.

Risk Ranking Matrix

All environmental issues have been assessed in accordance with the table below:

Risk Assessment Rankings: >17 = Extreme 10 - 16 = High 5 - 9 = Medium 1 - 4 = Low

Probability ►	CERTAIN	LIKELY	POSSIBLE	UNLIKELY	RARE
▼Consequence	5	4	3	2	1
5 – Severe	25	20	15	10	5
4 – Major	20	16	12	8	4
3 – Moderate	15	12	9	6	3
2 – Minor	10	8	6	4	2
1 – Incidental	5	4	3	2	1

Table D-1 Aspect risk register (P = Probability, C = Consequence, R = Risk)

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
		P	C	R		P	C	R	
Approvals and Licencing									
Non-compliance with approvals and planning conditions. Appropriate approvals / Licenses not obtained.	Works delays Infringements / Regulatory actions Breach of deed requirements Reputational loss	4	5	20	Establish and maintain register of approvals, licences, and permits. Implement Compliance Tracking Program to track compliances. Establish and implement Operational Environmental Management. Provide appropriate training.	3	3	9	Asset Manager/ Development Manager Area Manager Site HSE Manager Warehouse Tenant

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
Training									
Not providing training to all personnel and subcontractors	Non-compliance / non-conformance with agreed work methods and procedures	3	3	9	Induct all personnel to cover site specific environmental requirements. Provide toolbox talks for all personnel to cover the requirements of OEMP and Sub-plans including.	2	2	4	Site HSE Manager
Emergency									
Emergency services	Inability of emergency services to access site	3	4	12	Design access roads to allow emergency services to access site if required. Do not block site accesses. Always have the water supply available. Fill water carts fully with water when on standby.	3	2	6	Site HSE Manager Warehouse Tenant
Works requiring a hot works permit	Sparks from activities. Property damage. Destruction of flora and fauna. Increase the potential for bushfire with increases in temperature.	2	5	10	Implement management measures in the Bushfire Emergency and Evacuation Plan and Emergency Response Plan.	1	5	5	Site HSE Manager Area Manager

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
Noise /Vibration									
Noise from general construction and operation activities during and out of construction hours resulting in impacts to residents.	Disturbance to residents or neighbouring businesses. Potential for complaints. Disruption to community and surrounding fauna.	4	4	16	Develop and implement an operation Noise and Vibration Management Plan (in accordance with project documentation).				Site HSE Manager Area Manager CER Warehouse Tenants
Water Quality, Erosion & Sedimentation									
Sediment laden runoff from operation and construction works (vegetation clearing, removal of soil, placement of fill) leaving site. Non-compliant water from operation and construction works discharged from site. Adjacent to or instream / river works	Degradation of local watercourses. Damage to offsite flora and fauna habitat and aquatic ecology. Not compliant with discharge criteria). Community impacts. Soil loss.	4	4	16	Develop and implement a Stormwater Infrastructure Operation Maintenance Program Management Plan and Stormwater Quality Monitoring Program in accordance with project approval requirements.	2	3	6	Site HSE Manager Area Manager Warehouse Tenants CER

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
Waste									
Waste generation and disposal during construction	Incorrect disposal of waste. Prosecution Depletion of natural resources and disposal of large amounts of waste to landfill. Reputational impacts.	3	2	6	Implement Waste Management measures in accordance with project approval requirements as required.	2	2	4	Site HSE Manager Area Manager Warehouse Tenants
Contamination / Pollution Prevention									
Management of contaminated or untreated materials. Unexpected (including asbestos, UXO, EO and EOW), contaminated spoil during operation and construction.	Pollution of surface water, groundwater and land though spread of existing contamination resulting in water quality degradation. Safety risk to operation and construction staff and community from safety hazards associated with Chemical contaminants, UXO, EO and EOW	3	4	12	Develop and implement contamination management procedures and protocols in accordance with project approval requirements. Identify any contamination hotspots and incorporate procedures for these locations into operation and construction documentation. Develop unexpected finds procedures. Implement the management measures in the Emergency Response Plan (or equivalent). Provide emergency spill kits available onsite and include required maintenance.	2	2	4	Site HSE Manager Area Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
Hazardous Materials									
Storage of hazardous substances, leaking plant and equipment and spillage from refuelling Removal of hazardous materials	Localised ground contamination/ pollution of stormwater and requiring clean-up and/or receiving fills. Risk of igniting volatile substances. Unauthorised access to site/ potential vandalism/ damage leading to pollution.	4	3	12	Implement the management measures in the Emergency Response Plan (or equivalent). Provide emergency spill kits available onsite and include required maintenance. Inspect and audit storage areas and materials regularly. Restrict access to storage areas. Reduce/eliminate need for hazardous substances. Secure all work sites before leaving the site. Lock away all liquids (i.e. fuels, paints) securely at the end of each day. Wear appropriate PPE.	2	2	4	Site HSE Manager Area Manager Warehouse Tenants
Biodiversity									
Clearing and grubbing of vegetation within work site	Sediment deposition into surrounding vegetated areas and water courses, and invasion of weeds. Removing wrong vegetation.	3	4	12	Implement management measures in the Operational Flora and Fauna Management Plan.	2	3	6	Asset Manager/ Development Manager Site HSE Manager Area Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
	Potential for injury to native fauna. Habitat loss / Fragmentation. Spread of noxious weeds.								
Use of heavy and light vehicles and equipment	Risk of collision with fauna Creation of hazards for fauna Mortality to flora and fauna	2	3	6	Implement management measures in the Operational Flora and Fauna Management Plan. Include induction / toolbox training on clearance zones and required protection measures. Contact the local wildlife rescue agency and/or veterinary surgery for animal injuries.	1	3	3	Asset Manager/ Development Manager Site HSE Manager Area Manager Warehouse Tenants
Air Quality									
General operation and construction works (site establishment, vegetation clearing, earthworks, piling, drilling, etc)	High dust activity in close proximity to residential and commercial premises. Possibility of complaints. Odours form contaminated material stockpiles or due to use of bitumen / road sealing	4	4	16	Develop and implement Air Quality Management Plan in accordance with the Conditions of Consent.	3	3	9	Asset Manager/ Development Manager Site HSE Manager Area Manager Warehouse Tenants
Exhaust from plant and equipment	Emissions resulting in air pollutions.	3	2	6	Conduct inductions and toolbox trainings on Dust and Air Quality Management.	2	2	4	Site Supervisors

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
					Maintain plants and equipment.				
Heritage									
Unexpected heritage items encountered (removal or disturbances to heritage items).	Work delays. Additional studies. Approval requirements. Damages to heritage items.	3	4	12	Include general inductions and toolbox training on heritage management protocols. Implement Unexpected Finds Procedure.	2	4	8	Asset Manager/ Development Manager Site HSE Manager Area Manager Heritage Consultant
Traffic									
General operation and construction traffic disturbing public access between local roads.	Disturbance to local residents resulting in complaints being made. Potential for delays at local road access points resulting in compliant.	3	3	9	Develop and implement a Traffic Management Plan in consultation with relevant authorities. Advertise/notify detour routes. Provide clear notifications/ signage.	2	2	4	Site HSE Manager Area Manager Warehouse Tenants
Management of heavy vehicles/ haulage routes.	Complaints from sensitive receivers due to increased level and frequency of noise. Increasing local traffic. Changes to local traffic conditions.	3	3	9	Develop and implement a Traffic Management Plan in consultation with relevant authorities.	2	2	4	Asset Manager/ Development Manager Site HSE Manager Area Manager Warehouse Tenants CER
Heavy and light vehicle use of	Disturbance to local road users and residents resulting in complaints	3	4	12	Induction of new drivers regarding approved access routes	2	3	6	Site HSE Manager Area Manager

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
unauthorised access routes	Safety risk to road users Potential for delays at local road access points				Implement management measures in the Operational Traffic and Access Management Plan. Implement community notification procedures.				Warehouse Tenants CER
Road works	Road closures delays and diversions. Disturbance to road users resulting in community complaints Safety risk to road users	4	3	12	Implement management measures in the Operational Traffic and Access Management Plan. Conduct Road Safety Audit. Implement community notification procedures.	3	3	9	Site HSE Manager Area Manager Warehouse Tenants CER
Road closures	Changes to local traffic conditions. Increasing local traffic. Community complaints.	4	2	8	Implement Traffic Management Plan. Provide detour signage. Community Notification.	2	2	4	Site HSE Manager Area Manager Warehouse Tenants CER
Driving around site and offsite	Disturbance to EEC areas/ heritage sites Generation of dust leading to complaint/ impact on EEC habitat. Spread of weeds.	4	3	12	Do not access EEC areas by vehicle. Park on hard stand areas where possible, or outside of the drip line of trees. Use of water carts where necessary to suppress dust on exposed and trafficable areas. Maintain site speed limits and signage speed limits onsite.	3	3	9	Site HSE Manager Area Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
Resources and Energy Use									
Energy consumption by construction plant and operation of site compound facilities.	Inappropriate energy use. Waste of energy resources. Energy wastage costs. Increasing greenhouse gas emissions.	3	3	9	Provide inductions and toolbox training on waste management and energy saving practices in construction plant and equipment and during office work during operations. Avoid plant/equipment idling where possible onsite. Undertake equipment/plant inspects prior to use onsite. Consider of material substitution where reasonable and feasible to reduce embodied energy of construction materials.	3	2	6	Site HSE Manager Area Manager Warehouse Tenants
Water usage during operational activities	Excess usage of portable water for operational activities leading to a decline in the amount of portable water for residents.	3	2	6	Include water conservation and verifiable targets. Capture and reuse rainfall and runoff for site activities.	2	2	4	Site HSE Manager Area Manager Warehouse Tenants
Resource usage (e.g. building materials, water, fuels, packaging), waste generation and disposal.	Depletion of resources due to the wastage	2	4	8	Implement Waste Mitigation measures in accordance with project approval requirements as required.				Site HSE Manager Area Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
Visual									
Visual amenity	Light spill impacts to surrounding sensitive receivers and flora and faunas Land clearing Land use change from a defence facility to an operational IMT and warehousing site Graffiti	5	1	5	Direct lighting. Landscape. Retain vegetation where possible. Implement community communication strategy.	4	1	4	Site HSE Manager Area Manager Warehouse Tenants CER
Community									
Disruption to the community due to operational activities	Impacts on local residents	3	2	6	Implement Community Communication Strategy. Maintain communication with the community.	2	2	4	CER

Appendix E – LOGOS Sustainability Policy

Appendix F – Legislation register

Table F-1 Legislation register

Legislation	Relevance
Commonwealth Legislation	
Environment Protection and Biodiversity (EPBC) Act 1999	EPBC Approval (No. 2011/6086) issued in September 2016 includes a number of Conditions of Approval to be addressed as part of the Facility. Key sections under this Act that are relevant to the MPW Stage 2 Development include, but are not limited to: • Section 18 and 18A: Offences relating to threatened species • Section 25: Requirement for approval of prescribed actions • Section 26 and 27A: Protection of the environment from actions involving Commonwealth land • Section 28: Requirement for approval of activities of Commonwealth agencies significantly affecting the environment.
NSW Legislation	
Biodiversity Conservation Act 2016	Supersedes Parts 7-9 of the *National Parks and Wildlife (NPW) Act* 1974 • Part 2: Outlines requirements relating to the protection of animals and plants • Part 7: Outlines biodiversity assessment and approvals under Planning Act Section 98 (relating to the harm of protected fauna and threatened species) and Part 8A (relating to threatened species, populations and ecological communities) were applicable. Parts 7-9 of the Act have been repealed.
Biosecurity Act 2015	• Part 3: Establishes a general biosecurity duty requiring a person who is dealing with a biosecurity matter to ensure that, so far as is reasonably practicable the biosecurity risk is prevented, eliminated or minimised. • Part 4: Makes it an offence to fail to discharge a biosecurity duty in relation to a prohibited matter and includes a duty to notify the local control authority. • Schedule 1: Establishes special provisions relating to weeds, including a duty to control weeds on roads (where the road is not fenced on both sides). • Schedule 2: Lists 'prohibited matter' including terrestrial weeds.
Biosecurity Regulation 2017	• Part 2: Establishes mandatory measures relating to biosecurity matters • Part 6: Sets out the requirements for notifiable matters (i.e. prohibited matter or events and biosecurity events) • Schedule 1: Lists pests and diseases required to be notified

Legislation	Relevance
	• Schedule 3: Lists weeds that must not be imported into or sold in NSW
Crown Land Act 1989	The bed of the Georges River is considered to be Crown Lands and an easement or right-of-way over, a Crown reserve for the purposes of the Georges River rail bridge has been obtained in accordance CL Act. In addition, a crown land road within Glenfield waste facility exists. Note: Access to Crown Land will not be required
Contaminated Land Management (CLM) Act 1997	• Part 4: Requirements for Site audits outlines any ongoing validation requirements. • Section 60: Outlines duty to report contamination
Dangerous Goods (Road and Rail Transport) Act 2008	• Section 9: Outlines duties concerning the transport of dangerous goods
Dangerous Goods (Road and Rail Transport) Regulation 2014	• Part 3: Outlines duties concerning the transport of dangerous goods to which special provisions apply • Part 4: Outlines duties in relation to packaging of dangerous goods • Part 5: Outline consignment procedures for dangerous goods • Part 6: Outlines safety standards (vehicles and equipment) for dangerous goods • Part 7: Outlines transport operations relating to certain dangerous goods
Environmental Planning and Assessment (EP&A) Act 1979	• Part 4, Division 4.7: Relates to the approval pathway for State significant developments (SSD). In particular, Section 4.38 provides consent for the Facility as SSD (and thus conditions of consent relating to operation). Section 4.55: Modification of consents • Division 9.2: Investigative powers of Investigation Officers • Schedule 5 Development control order: Orders that may be given from the Minister or Secretary (i.e. stop work and compliance orders).
Environmental Planning and Assessment Regulation 2000	• Part 4: Development contributions. Check if already paid • Part 6: Procedures relating to development applications (including modifications) • Part 8: Certification of development
Fisheries Management Act 1994	• Part 7A: Conditions for threatened species conservation
Heritage Act 1977	• Section 146: Relating to the notification of impacts and heritage finds to the Heritage Council of NSW

Legislation	Relevance
National Parks and Wildlife (NPW) Act 1974	• Part 6: Aboriginal objects and places. Aboriginal Heritage sites are managed under this Act by the Office of Environment and Heritage (OEH). Unexpected finds of heritage require stop work proceedings and approval sought from OEH to disturb site.
National Greenhouse and Energy (NGER) Act 2007*(Commonwealth)*	• Part 3: Reporting obligations of registered corporations
Protection of the Environment Operations (POEO) Act 1997	• Section 115: Offence relating to the disposal of waste and harm to environment • Section 116: Offence relating to leaks, spillages and other escapes • Section 120: Offence relating to pollution of waters • Part 5.4: Requirements to prevent air pollution • Part 5.5: Requirements to prevent noise pollution • Section 142A: Offence relating to the pollution of land • Section 143: Relating to the unlawful transporting or depositing of waste • Section 148: Pollution incidents causing or threatening material harm to be notified • An EPL for operations may be obtained, should it be required.
Protection of the Environment Operations (Clean Air) Regulation 2010	• Part 4: Relating to use and maintenance of motor vehicles and motor vehicle fuels • Part 5: Air impurities emitted from activities and plant • Part 6: Control of volatile organic liquids
Protection of the Environment Operations (Waste) Regulation 2014	• Part 3: Records, measurement of waste and monitoring at scheduled waste facilities. Relating to interface with Glenfield waste facility.
Protection of the Environment Operations (Noise Control) Regulation 2017	• Part 2: Motor vehicles and motor vehicle accessories • Part 6: Determining noise levels
Roads Act 1993	• Section 138: An approval under Section 138 for road infrastructure works (i.e. maintenance) associated with the Facility is required in accordance with the CoC
Rural Fires Act 1997	• Section 63: Duty of public authorities and owners and occupiers of land to prevent bushfires • Section 64: Duty of occupiers to extinguish fires or notify firefighting authorities • Division 4: Bush fire danger period • Division 7: Offences

Legislation	Relevance
Work Health and Safety Act 2011	• Part 2: Outlines Health and safety duties • Part 3: Duty to notify WH&S incidents
Work Health and Safety Regulation 2017	• Section 34: Duty to identify hazards • Part 3.2: General workplace management

Appendix G – Light spill management

Light Spill Management

Purpose

This Appendix has been developed for the operation of the Development to address Condition 13 of the MPW EPBC 2011/6086 Approval, and forms part of the Operational Environmental Management Plan.

Local context

A number of residential suburbs are located in proximity to the Development. The approximate distances of these suburbs to the Facility are provided below:

Table G-1 Proximate residential suburbs

Suburb	Distance to Facility
Casula	330m to the west
Moorebank	630m to the north-east
Glenfield	820m to the south-west
Wattle Grove	1000m to the east

The land surrounding the site includes:

- The Moorebank Precinct East (MPE) Site, formerly the Defence National Storage Distribution Centre (DNSDC), on the eastern side of Moorebank Avenue, which was owned by Qube Holdings Ltd.
- The Medium Voltage Production Facility site, also known as the ABB site, located to the north-west of the MPW Site on the eastern side if the Georges River, owned by ABB Australia.
- The Glenfield Waste Facility (GWF) located to the south-east of the MPW Site, on the western side of the Georges River, which is owned by Glenfield Waste Services Group.
- The area immediately east of the MPW Site (and directly south of the MPE Site) known as the ‘Southern Boot Land’, includes an existing rail spur within a vegetated remnant bushland. The East Hills Rail Corridor is south of the Southern Boot Land, which is owned and operated by Sydney Trains. Further to the southeast is the Holsworthy Military Reserve, which is owned by the Commonwealth.
- The Boot Land, to the immediate east of the MPE Site between the eastern site boundary and the Wattle Grove residential area, which is owned by the Commonwealth.
- The Defence Joint Logistics Unit (DJLU) is located immediately east of the MPW Site. The DNSDC was relocated to the Defence Joint Logistics Unit (DJLU), to the north of the MPE Site, and is listed as a sensitive receiver in the MPW Stage 2 EIS.
- The Moorebank Business Park located adjacent to the MP Site on the eastern side of Moorebank Avenue to the north of the DJLU site and Anzac Road.

Operational impacts

Lighting would be required during operation of the Project to illuminate the Development, and on plant and equipment.

The impacts of light spill during operation of the Development are expected to be minor due to proposed appropriate placement, height, direction and selection of lighting types. There is a considerable separation of residential dwellings from the Development, which would further reduce the impact of this lighting during operation of the Development.

Management measures

The following management measures will be implemented during the operation of the Development:

- Appropriate selection of light source, luminaire, luminaire mounting height and luminaire aiming as detailed in the MPW Stage 2 Urban Design Development Report (UDDR) (MPW Response to Submission Management and Mitigation Measures 14D to 14H).
- Lighting will be located and selected in accordance with AS4282-1997 – Control of the Obtrusive Effects of Outdoor Lighting.
- Management of light spill impacts in response to light spill related complaints.
- Temporary lighting (fixed and portable) will be designed and located to minimise the effects of light spill on surrounding sensitive receivers (MPW Response to Submission Management and Mitigation Measure 14C).
- Potentially affected residents and relevant authorities will be notified in advance of any out of hours works (MPW PEMF).

Monitoring

Monitoring of light spill impacts will be undertaken by the Site HSE Manager (or delegate) during monthly inspections of operational activities to monitor compliance with the requirements of the approval and this OEMP.

Inspections will consider the following key issues:

- Location and direction of temporary (fixed and portable) lighting
- Implementation of permanent lighting in compliance with the UDDR.

Appendix H – Unexpected Finds Protocol

Moorebank Intermodal Precinct – West Precinct Stage 2

SSD 7709

Unexpected Finds Protocol

Author	Neda Yousefi	
Checker	Andrew Wiltshire	
Approver	Andrew Wiltshire	
Report No	J1883230515.3	
Date	15/03/2023	
Revision	3	

Author Details

Author Details	Qualifications and Experience
Neda Yousefi	BEng, MHydStructures, PhD Neda has over 4 years of experience in environmental science, assessment, and planning. This experience has seen her involvement in projects for both the public and private sector, ranging from small to large scale.

Revisions

Revision	Date	Description	Prepared by	Approved by
1	10/11/2022	Draft	N. Yousefi	A. Wiltshire
2	07/12/2022	Final	N. Yousefi	A. Wiltshire
3	15/03/2023	Updated to include reference to the MPW Stage 3 Precinct Operational Environmental Management Plan	N. Yousefi	A. Wiltshire

Acronyms and Definitions

Acronym / Term	Meaning
CoC	Conditions of Consent
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
FCMMs	Final Compilation of Mitigation Measures
MOD 1	Modification 1 to SSD 7709, granted by the IPC 24 December 2020
MOD 2	Modification 1 to SSD 7709, granted by the IPC 30 September 2021
MPW Concept Approval	MPW Concept Approval (SSD 5066), granted by DPE on 29 September 2014 for the development of an intermodal terminal facility including a rail link connecting the site to the Southern Sydney Freight Line, an intermodal terminal, warehousing and distribution facilities and a freight village.
MPW	Moorebank Precinct West
PFAS	Per & Poly-Fluoroalkyl Substances
SIMTA	Sydney Intermodal Terminal Alliance
SSD	State Significant Development
the Development	MPW Stage 2 Development
UFP	Unexpected Finds Protocol

1. Introduction

This Unexpected Finds Protocol (UFP) has been developed to manage the unexpected discovery of contamination, ordnances, Aboriginal sites, Non-indigenous heritage items and threatened flora and fauna during the operation of the Moorebank Project West (MPW) Development (SSD 7709) (the Development), the second stage of Development under the MPW Concept Approval (SSD 5066).

The protocol provides a process for the management of unexpected finds at the Development during operations.

1.1. Objectives and targets

Table H-1 shows objectives and targets for the management of unexpected finds for the Development.

Table H-1 Objectives and targets

Objective	Target	Timeframe
To implement the unexpected finds protocol to minimise the impacts of onsite contamination (including Ordnance) that has not previously been recorded within the Development.	Stop relevant works in 100% of cases where potential contamination is identified in accordance with the Unexpected Finds (Contamination) Protocol (Appendix A)	Operation
To implement the unexpected finds protocol to minimise impacts on unknown non-indigenous heritage items and Aboriginal sites.	STOP works in 100% cases where potential heritage is identified in accordance with the Unexpected (Aboriginal Sites and Non-Indigenous Heritage) Finds Protocol (Appendix B)	Operation
To implement the unexpected finds protocol to minimise impacts on threatened flora and/or fauna species or threatened ecological communities that have not been previously recorded within the Development.	Stop relevant works in 100% of cases where potential threatened flora and/or fauna species or threatened ecological communities are identified in accordance with the Unexpected (Biodiversity) Finds Protocol (Appendix C)	Operation

2. Environmental Management

2.1. Compliance Matrix

The operation of the Development is approved under both the Environmental Planning and Assessment Act 1979 (EP&A) Act), and the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Both these approvals have environmental conditions relevant to the operation of the Development.

Table H-2 provides a summary of the MPW Stage 2 (SSD 7709) Conditions of Consent (CoC) requirements to be addressed in this protocol and delivered within the Development.

Table H-2 MPW Stage 2 (SSD 7709) CoC

CoC	Requirement	Reference
B148	If any Aboriginal object of Aboriginal place is identified on site, or suspected to be on site (other than those identified in the EIS): (a) all work in the immediate vicinity of the object or place must cease immediately; (b) a 10 m wide buffer area around the object or place must be cordoned off; and (c) OEH must be contacted immediately.	Appendix B of this Protocol
B149	Work in the immediate vicinity may only recommence if: (a) the object or place is confirmed by OEH upon consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal place; or (b) an Aboriginal Cultural Heritage Management Plan is prepared in consultation with the Registered Aboriginal Parities and OEH to include the object or place and appropriate measures in respect of it, and the Plan is approved by the Planning Secretary; or (c) OEH is satisfied as to the measures to be implemented in respect of the object or place and makes a written direction in that regard.	Appendix B of this Protocol
B150	If any unexpected archaeological relics are uncovered: (a) all work in the immediate vicinity of the find must cease immediately; (b) OEH Heritage Division must be notified;	Appendix B of this Protocol

CoC	Requirement	Reference
	(c) a suitably qualified and experienced archaeologist (e.g. project archaeologist) must record and assess the significance of the find with the results reported to the Planning Secretary, OEH Heritage Division, Council and the local Historical Society; and (d) where required, a Management Strategy is to be developed and implemented in consultation with the OEH Heritage Division.	
B151	Work in the immediate vicinity of the find may only recommence on the advice of the project archaeologist	Appendix B of this Protocol
B159	If any native flora or fauna is identified on site that has not been previously identified in the documents listed in Condition A3: (a) work must cease in the vicinity; (b) a buffer zone must be established in consultation with the project ecologist; (c) OEH must be notified; (d) appropriate mitigation measures must be determined in consultation with OEH (including relevant relocation measures); and (e) ecological monitoring and/ or biodiversity offset requirements must be updated, where required.	Appendix C of this Protocol
B174	Unexpected Ordnance (UXO), Exploded Ordnance (EO) and Exploded Ordnance Waste (EOW) protocols must be prepared by an UXO contractor listed on the Defence Panel of suitably qualified UXO consultants and contractors.	Appendix A of this Protocol

A list of the Final Compilation of Mitigation Measures (FCMMs) as relevant to the Development are also provided in Table H-3.

Table H-3 Final Compilation of Mitigation Measures (FCMMs)

FCMM	Requirement	Reference
9G	Consultation with RAPs would continue throughout the life of the Proposal, as necessary. Ongoing consultation with RAPs would take place throughout the reburial of retrieved artefacts and in the event of the discovery of any unexpected Aboriginal objects.	Appendix B of this Protocol

Relevant EPBC 2011/6086 Conditions of Approval that are required to be addressed in this UFP, are identified in Table H-4.

Table H-4 EPBC 2011/6086 Conditions of Approval

FCMM	Requirement	Document reference
8	Sections of the CEMP and OEMP relating to contamination and soils must be prepared by a suitably qualified expert and must: … d) in relation to management of PFAS: … ii) detail implementation and operational procedures, appropriate to the risk posed by any contamination, including: … • a contingency action plan for unexpected PFAS contaminant discoveries vi) detail review procedures appropriate to the risk posed by any contamination	Refer to the Moorebank Precinct West –Early Works Per & Poly-Fluoroalkyl Substances (PFAS) Management Plan Appendix A of this Protocol
11	Sections of the CEMP and OEMP relating to Aboriginal heritage must be prepared by a suitably qualified expert and must: a) be consistent with the Aboriginal Heritage Provisional Environmental Management	Appendix B of this Protocol

FCMM	Requirement	Document reference
	Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	
12	Sections of the CEMP and OEMP relating to European heritage must be prepared by a suitably qualified expert and must: a) be consistent with the European Heritage Provisional Environmental Framework (2 July 2014), provided at Appendix O to the finalised EIS b) incorporate all measures 13A to 13M from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 13A to 13M from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	Appendix B of this Protocol

2.2. Unexpected Finds Protocols

Specific protocols for the discovery of unexpected finds have been developed for potential:

- Onsite contamination, including ordnance
- Aboriginal sites and Non-indigenous heritage finds
- Threatened flora and/or fauna species or threatened ecological communities

Each of these specific protocols is included in the following appendices.

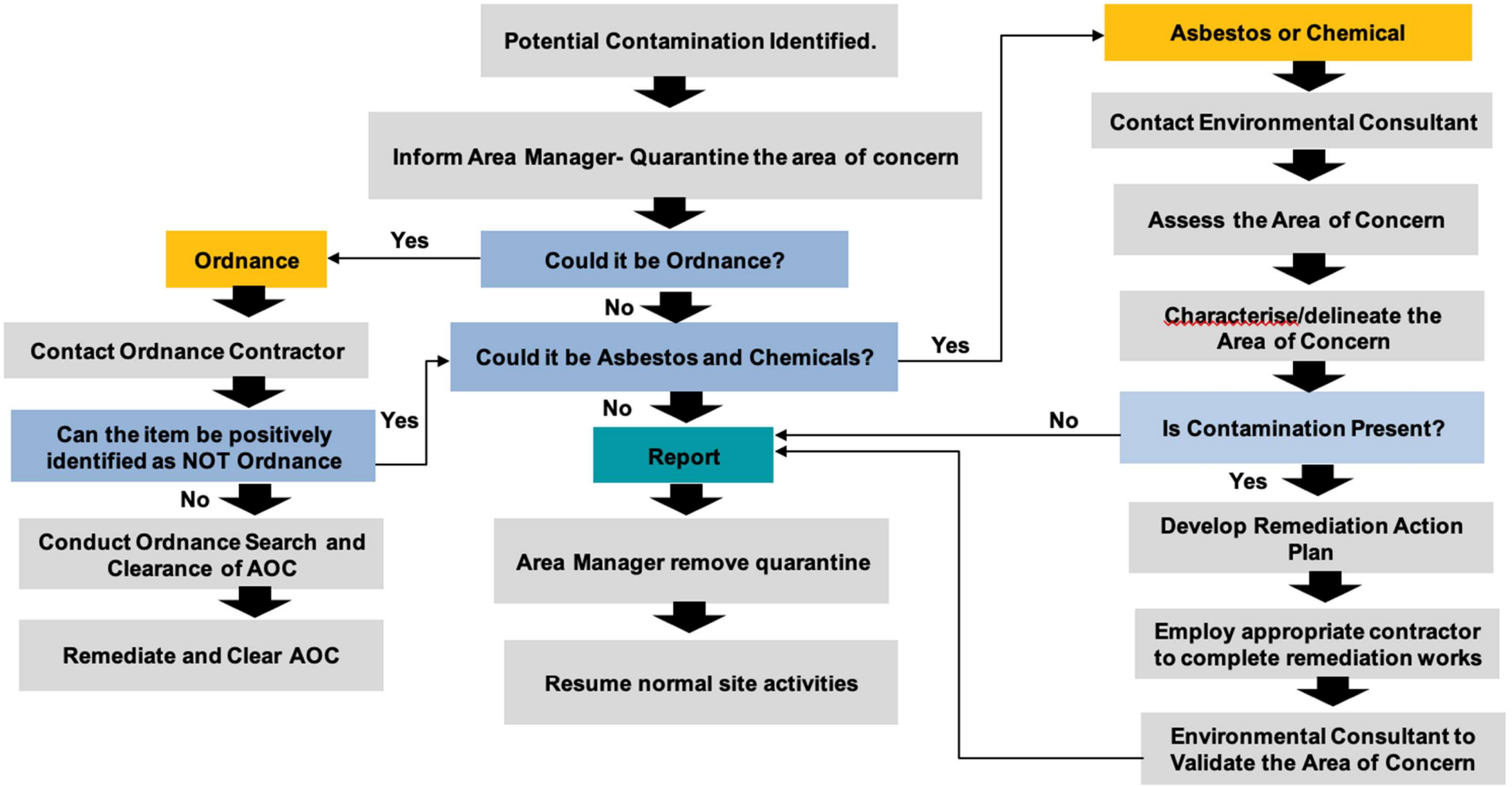
Appendix A – Unexpected Contamination Finds Protocol

Potential Site Hazards

If you SEE or SMELL anything unusual

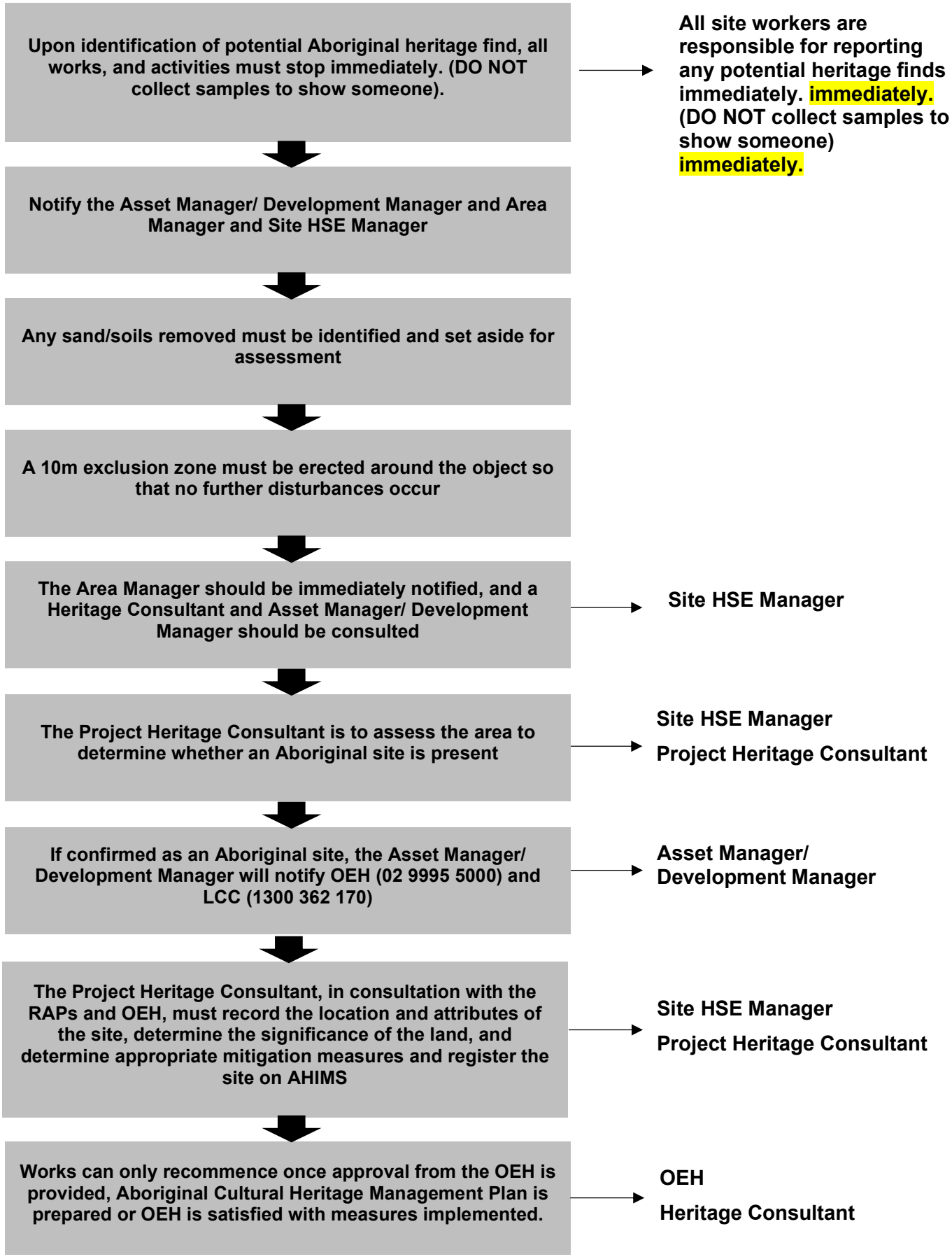
STOP WORK and contact Site HSE Manager

Do not restart work before the area has been investigated and cleared by an Environmental Consultant


Potential Contamination Identified.
Inform Area Manager- Quarantine the area of concern
Could it be Ordnance?
Yes
Ordnance
Contact Ordnance Contractor
Can the item be positively identified as NOT Ordnance
Yes
No
Conduct Ordnance Search and Clearance of AOC
Remediate and Clear AOC
No
Could it be Asbestos and Chemicals?
Yes
No
Report
Area Manager remove quarantine
Resume normal site activities
Asbestos or Chemical
Contact Environmental Consultant
Assess the Area of Concern
Characterise/delineate the Area of Concern
Is Contamination Present?
No
Yes
Develop Remediation Action Plan
Employ appropriate contractor to complete remediation works
Environmental Consultant to Validate the Area of Concern

Appendix B – Unexpected Aboriginal sites and Non-Indigenous Heritage Finds Protocol

Aboriginal Sites/Item



Examples of potential unexpected Aboriginal sites/item finds

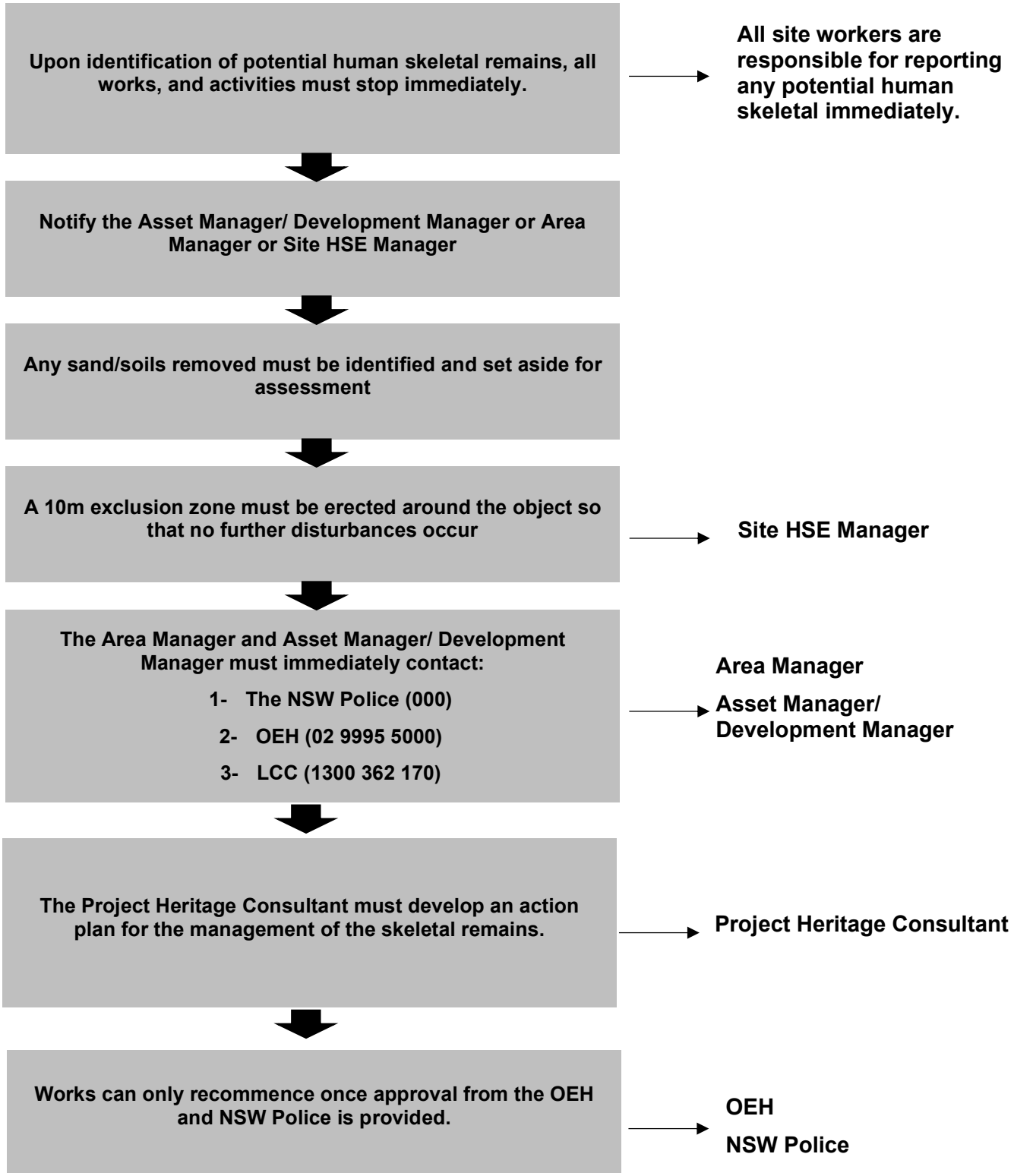
It is highly unlikely that an Aboriginal artefacts will be identified on the site due to the historical disturbance of the area. However, the most likely finds are isolated finds such as flaked stone tools.

Typical characteristics of flaked stone tools include:

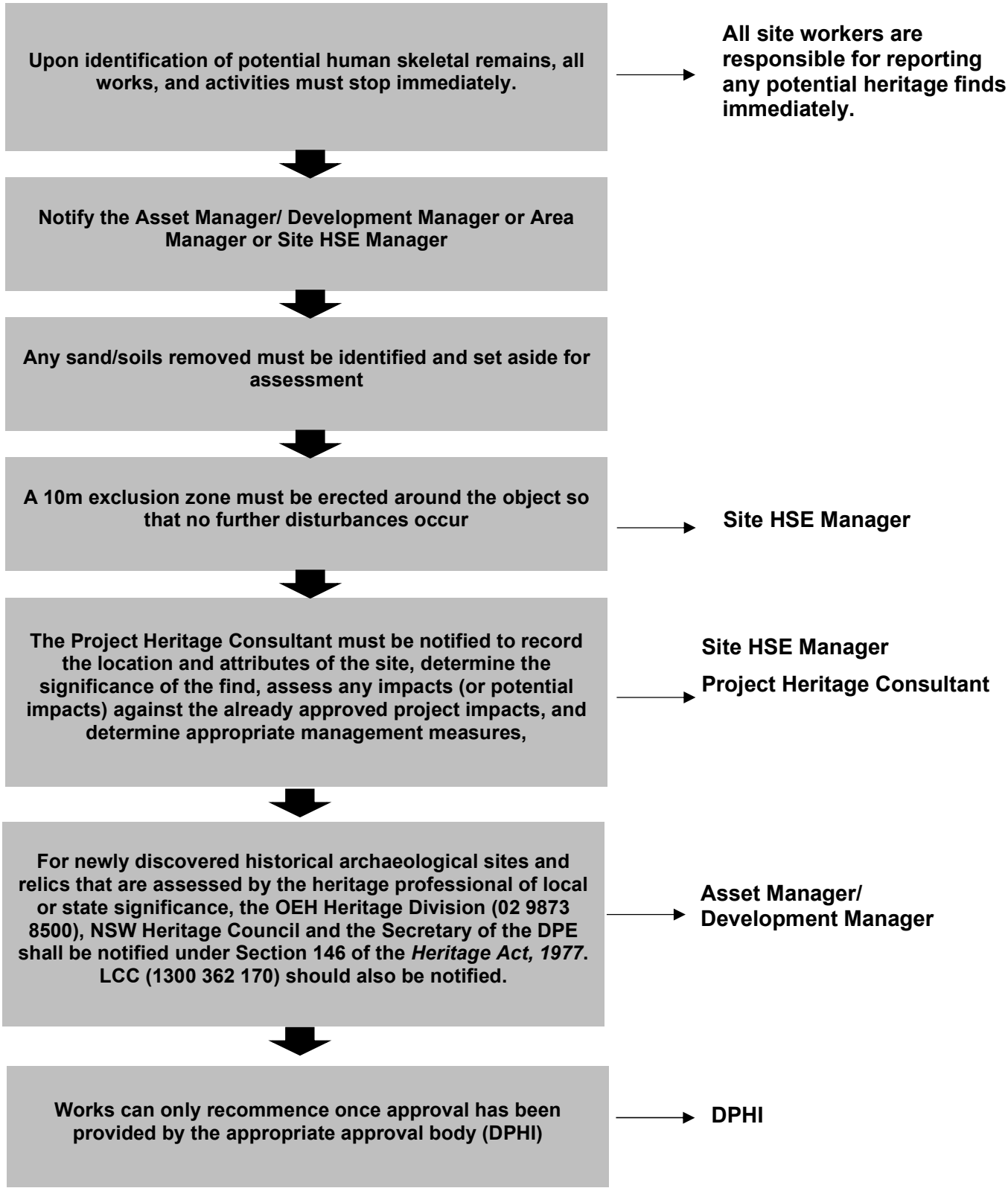
- Sharp edges
  - Retouch along one or more edges
  - Stone rich in silica
  - Stone type often different to the natural rock in the area
- Flakes
  - Usually less than 5 mm long
  - A ‘striking platform’ visible
  - Impact point often present on the striking platform
  - A ‘bulb of percussion’ often present below the striking platform
  - May have been shaped into a recognizable tool form, such as point or scraper.
- Cores
  - May be fist-sized or smaller
  - May have one or more scars where flakes have been removed.

It is noted that not all features can be seen on each stone tool and some require an experienced eye to identify them. Breakage can remove key features.

Skeletal remains



Non-Aboriginal heritage



Note: In the context of this UFP, an unexpected find is defined as a previously unknown heritage item or evidence of heritage value. It does not include uncovering findings within previously identified potential archaeological deposits.

Appendix C – Unexpected Biodiversity Finds Protocol

Unexpected Biodiversity Finds Protocol

Purpose

This Unexpected Finds Protocol explains the actions ad measures to be implemented if any threatened flora and/or fauna species or threatened ecological communities that have not been previously recorded within the Development are identified during operation.

Training

All personnel undertaking activities within the Development will be included on the identification of known and potential threatened species and ecological communities occurring onsite and will be trained in this protocol through Toolbox talks or a site induction.

Protocol

Upon detection of threatened species or ecological community during operation, the following steps must be followed.

1. **STOP ALL WORK** in the vicinity of the find. Immediately notify the Site HSE Manager/ Area Manager who will notify the Development Ecologist and Asset Manager/ Development Manager. The Project Ecologist must confirm the presence f the threatened species.
2. **EXCLUSION ZONE**. In consultation with the Development Ecologist, create a buffer zone/ exclusion zone around the find.
3. **EXTERNAL NOTIFICATION**. Asset Manager/ Development Manager to notify OEH of previously unidentified species.
4. **ASSESS IMPACT**. An assessment is to be undertaken by the Area Manager, Asset Manager/ Development Manager and Development Ecologist in consultation with OEH to identify the flora and/or fauna species level, the likely impact to them and appropriate management options, such as re-location measure.
5. **OBTAIN APPROVALS**. Obtain any relevant licences, permits or approvals required if the threatened species/ ecological community is likely to be significantly impacted. Consultation with OEH must be completed for any proposed amendment to location or reclassification of threatened species, populations and ecological communities as identified in the updated BAR.
6. **RECOMMENCE WORKS**. Any works may recommence once the Site HSE Manager has:
    - Obtained approvals as required
    - Confirmed that all corrective actions and additional mitigation measures have been implemented.
7. **UPDATE PLANS AND PROCEDURES**. The Site HSE Manager must ensure that the threatened species/ ecological community is included in subsequent site plans and/or sensitive area drawings, inductions and Toolbox Talks. The Site HSE Manager must provide information to enable an update of ecological monitoring and/or biodiversity offset requirements.

Appendix I – MPW Stage 3 Precinct Operational Environmental Management Plan