CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Moorebank Precinct West Stage 2

22 MARCH 2021

SYDNEY INTERMODAL TERMINAL ALLIANCE

Moorebank Precinct West Stage 2

Construction Environmental Management Plan

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REVISIONS

Revision	Date	Description	Prepared by	Approved by
A	27/07/2018	Initial draft to client	KN / AK	KP
B	24/09/2018	Second draft to client	JC / KN	JC
C	26/10/2018	Issued for ER Review	JC / KN	JC
D	04/01/2018	Updated to address ER comments	JH	JC

Revision	Date	Description	Prepared by	Approved by
E	31/07/2019	Updated to Reflect Conditions of Consent and client comments	KP	JC
F	13/09/2019	Updated to address ER comments	KP, ZQ	JC
G	27/09/2019	Updated to address ER comments	AC	AL
H	17/10/2019	Updated to include Appendix R Light Spill Management (now Appendix Q)	MWR/AC	JC
I	09/12/2019	Updated to address ER comments and Final Conditions of Approval	MWR	AL
J	14/01/2020	Updated to address DPIE comments	ZQ	JC
K	18/02/2020	Updated to reflect annual review	CS	RJ
L	22/03/2020	Updated in response to approval of MPW Stage 2 MOD1	KB	KP

KEY TERMS AND ACRONYMS

Acronym/Term	Meaning
Accordance Assessment	An examination of the need, scope, scale and method of a proposed change to the Project to determine whether the proposed change is of "*minor environmental impact"* and "*in accordance with"* the planning approval documentation (i.e. the EIS/RtS, CoC and this CEMP), or if the proposed change constitutes a modification to the consent under Section 4.55 of the EP&A Act.
AS	Australian Standard
CAQMP	Construction Air Quality Management Plan
CCS	Community Consultation Strategy
CEC	Community Engagement Consultant
CEMP	Construction Environmental Management Plan
CFFMP	Construction Flora and Fauna Management Plan
CMP	Contamination Management Plan
CMRP	Compliance Monitoring and Reporting Program
CNVMP	Construction Noise and Vibration Management Plan
CRPAR	Compliance Reporting Post Approval Requirements (Department, 2018)
CoA	Conditions of Approval as detailed in the EPBC Act Approval EPBC 2011/6086
CoC	Conditions of Consent as detailed in the EP&A Act Development Consent SSD 7099
Construction area / footprint	Extent of construction works, namely areas to be disturbed during the construction of the Project, as identified in the MPW S2 RtS
Contractor's CLM	Contractor's Community Liaison Manager
Contractor's CM	Contractor's Construction Manager
Contractor's EM	Contractor's Environmental Manager
Contractor's PM	Contractor's Project Manager
Council	Liverpool City Council
CSWMP	Construction Soil and Water Management Plan
CTAMP	Construction Traffic and Access Management Plan
DAWE	Department of Agriculture, Water and the Environment (formerly DotEE)
DECC	Department of Energy and Climate Change
DIPNR	Department of Infrastructure Planning and Natural Resources

Acronym/Term	Meaning
DotEE	Department of the Environment and Energy merged with all functions of the Department of Agriculture (February 2020) to form the Department of Agriculture, Water and the Environment (DAWE)
DPIE	Department of Planning, Industry and Environment
ECMs	Environmental Control Maps
EIFR	Environmental Incident Frequency Rate
EIS	Environmental Impact Statement
EMS	Environmental Management Systems
ENM	Excavated Natural Material (ENM) is naturally occurring rock and soil (including materials such as sandstone, shale, clay and soil) that has: a) Been excavated from the ground b) Contains at least 98 per cent (by weight) natural material c) Does not meet the definition of Virgin Excavated Natural Material (VENM).
Environmental Emergency	Any event that causes or has the potential to cause material harm to the environment. An environmental emergency is a Class 3 incident.
Environmental Incident	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.
EP&A Act	*Environmental Planning and Assessment Act* 1979
EPA	Environment Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act* 1999
EPL	Environment Protection Licence
ERP	Emergency Response Plan
ER	Environmental Representative
ESCP	Erosion and Sediment Control Plans
FCMM	Final Compilation of Mitigation Measures. These are the management and mitigation measures (2 November 2018) included in Appendix 2 of the SSD 7709 Consent.
GHG	Greenhouse gases
ICAM	Incident Cause Analysis Method
IMEX	Import-Export Terminal Facility
IMT	Intermodal freight terminal
IPC	Independent Planning Commission
ISO	International Organisation for Standardisation

Acronym/Term	Meaning
Material harm	Harm that involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)
Minor amendment	Updates to the CEMP, CEMP sub-plans and monitoring programs that are of an administrative nature and are consistent with the terms of the consent and the CEMP, CEMP sub-plans and monitoring programs, do not materially alter the outcomes of the Project, such that planning modification would be required by DPIE and are not considered to carry an environmental risk greater than that considered in the approved Project EIS
MIT	Moorebank Intermodal Terminal
MOD 1	Modification 1 to SSD 7709, granted by the IPC 24 December 2020.
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
MPW Concept Approval	MPW Concept Approval (SSD 5066), granted by (the now) DPIE 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 Concept EPBC Act Approval	Commonwealth Approval (No. 2011/6086) granted in September 2016 under the *Environment Protection and Biodiversity Conservation Act 1999*, for the impact of the MPW Project on listed threatened species and communities (sections 18 and 18A of the EPBC Act) and Commonwealth action (sections 28 of the EPBC Act).
MPW Stage 2	Moorebank Precinct West Stage 2 ('the Project')
MPW Stage 2 EIS	The Environmental Impact Statement prepared to support the application for approval of MPW Stage 2 under the *Environmental Planning and Assessment Act 1979*.
MPW Stage 2 RtS	Moorebank Precinct West Stage 2 Proposal – Response to Submissions Report (July 2017), prepared in response to the submissions received regarding the MPW Stage 2 Proposal.
Non-compliance	An occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with Development Consent SSD 7709 Conditions of Consent or EPBC Act Approval (EPBC 2011/6086) Conditions of Approval but is not an incident
Non-conformance	Observations or actions that are not in strict accordance with the CEMP and the aspect specific sub-plan.
NGER	National Greenhouse and Energy Reporting
OEH	Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
PFAS	Per- and Poly-Fluoroalkyl Substances
PIRMP	Pollution Incident Response Management Plan

Acronym/Term	Meaning
Principal's Representative	The Project Management Team and Environmental Specialists
Project ('the')	The MPW Stage 2 project, as approved under the MPW Stage 2 Approval (SSD 7709) and the MPW EPBC Approval (2011/6086).
Project personnel	All persons listed in Section 2.4 including sub-contractors working on the Project site.
Project site / Project footprint	The subject of the MPW Stage 2 EIS, the part of the MPW site which includes all areas to be disturbed by the Project (including the operational area and construction area).
RCMM	Revised Compilation of Mitigation Measures. These are the management and mitigation measures presented in the MPW Stage 2 RtS (July 2017). The RCMM were superseded by the FCMM.
REMM	Revised Environmental Management Measures. These are the management and mitigation measures presented in the MPW Concept Plan Supplementary RtS (August 2017).
RfMA	Request for Minor Amendment
RtS	Response to Submissions
SHEMS	Safety Health and Environmental Management System (also known as the Moorebank Intermodal Precinct Incident Management Process)
SIMTA	Sydney Intermodal Terminal Alliance
SSD	State significant development
SSFL	Southern Sydney Freight Line
TEUs	twenty-foot equivalent units
VENM	Virgin Excavated Natural Material (VENM) has been excavated or quarried from areas that are not contaminated with manufactured chemicals or process residues, as a result of industrial, commercial, mining or agricultural activities
Warehouse JN	The warehouse known as Warehouse JR, identified as Warehouse 5 in the plan titled 'Precinct Modification Plan — Proposed' (Drawing No JR-SK-A-0-9402, Revision G), prepared by Bell Architecture and dated 16 October 2020)
Warehouse JR	The warehouse known as Warehouse JN, identified as Warehouse 6 in the plan titled 'Precinct Modification Plan — Proposed' (Drawing No JR-SK-A-0-9402, Revision G), prepared by Bell Architecture and dated 16 October 2020)
WMS	Work Method Statement

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1 INTRODUCTION

The Sydney Intermodal Terminal Alliance (SIMTA) received approval for the construction and operation of Stage 2 of the Moorebank Precinct West (MPW) Project (State Significant Development (SSD) 7709), (the Project), and subsequently Modification 1 (MOD1), which comprises the second stage of development under the MPW Concept Approval (SSD 5066). This Construction Environmental Management Plan (CEMP) defines the environmental management framework under which the Project will be delivered.

The Project involves the construction and operation of a multi-purpose Intermodal (freight) Terminal (IMT) facility, rail link connection, warehousing, freight village, and upgrades to the Moorebank Avenue and Anzac Road intersection. Details on the key components of the Project are included in Schedule 1 of the Development Consent and Section 1.2 of this plan. The location of the Project site is shown in Figure 1-1.

1.1 Development Consent

The MPW Stage 2 Project has been assessed by the Department of Planning, Industry and Environment (DPIE) under Part 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as SSD. The Independent Planning Commission (IPC) granted approval for the MPW Stage 2 Project on 11 November 2019 and is subject to the Minister's Conditions of Consent (CoC) (SSD 7709) with MOD1 approved on 24 December 2020. The Project, including its potential impacts, consultation and proposed mitigation and management is documented in the following suite of documents:

- Development Consent SSD 7709
- Modification to Development Consent SSD 7709 MOD1
- Moorebank Precinct West – Stage 2 – Environment Impact Statement (EIS) (Arcadis Australia Pacific Pty Limited, October 2016)
- Moorebank Precinct West – Stage 2 – Response to Submissions (RtS) (Arcadis Australia Pacific Pty Limited, July 2017)
- *Environment Protection and Biodiversity Conservation Act* 1999 (EPBC Act) Approval (EPBC 2011/6086) granted on 27 September 2016.

1.1.1 CEMP Purpose and Context

This CEMP is the overarching plan for construction environmental management of the Project.

This CEMP has been developed in accordance with Guidelines for the Preparation of Environmental Management Plans (Dept. of Infrastructure of Planning and Natural Resources (DIPNR), 2004) to address:

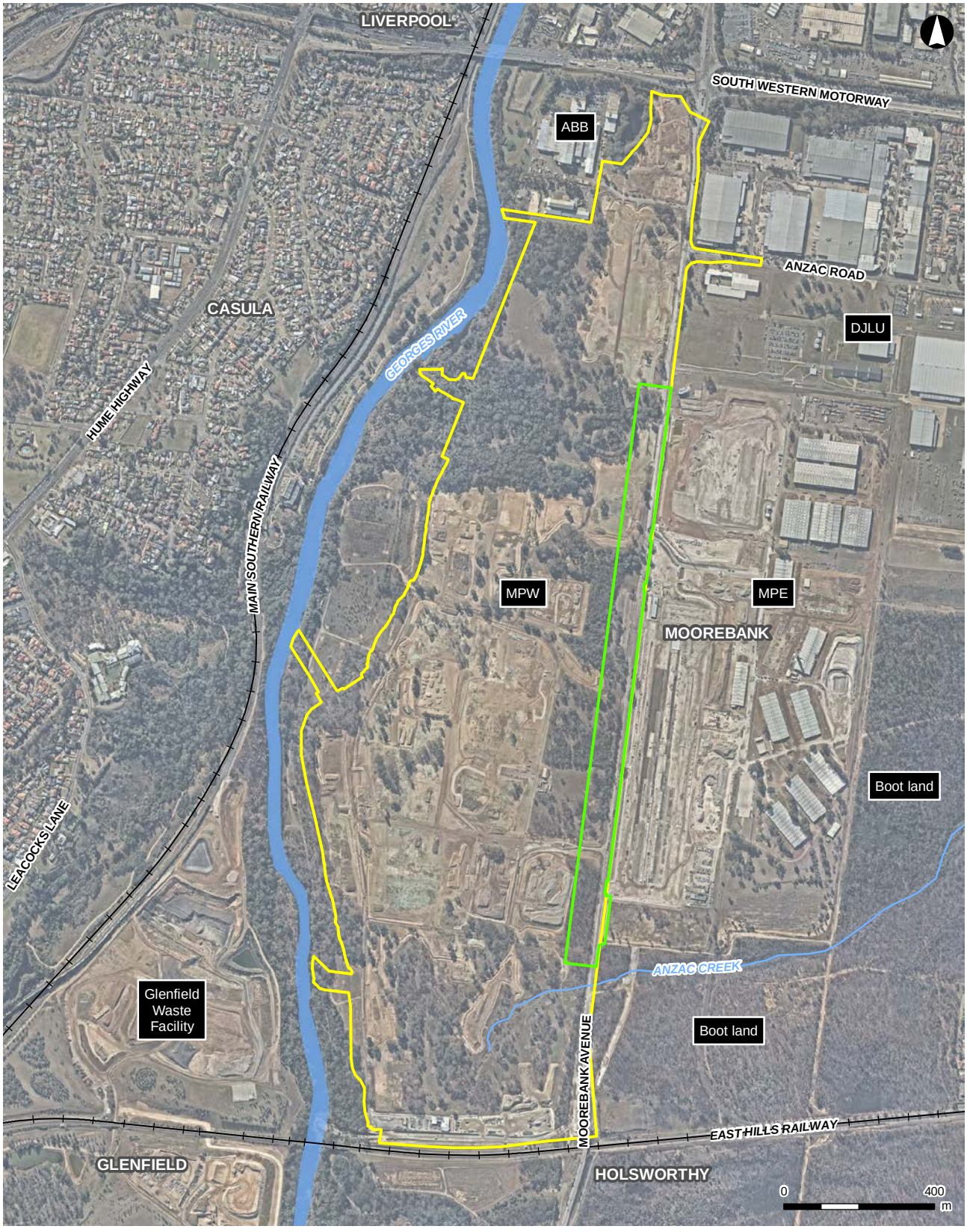
- CoC under Development Consent SSD 7709 and MOD1
- Department of Agriculture, Water and Environment (DAWE) (formerly Department of the Environment and Energy (DotEE)) Approval (EPBC 2011/6086) Consolidated assessment clarification responses
- Final Compilation of Management Measures (FCMM) (2 November 2018) included in Appendix 2 of the SSD 7709 Consent
- Revised Compilation of Mitigation Measures (RCMM) from the MPW Stage 2 RtS
- Revised Environmental Management Measures (REMM) for the Moorebank Intermodal Terminal (MIT) Final EIS
- Environment Protection Licence (EPL) No. 21054

This CEMP is relevant during construction of the Project as detailed in Section 1.2.1.

This CEMP has been prepared specifically to address the requirements of CoC C1 and C2 of MPW Stage 2 SSD 7709. It should be noted that there is some overlap with the Moorebank Precinct East (MPE) Stage 2 (SSD 7628) project footprint in respect of the Moorebank Avenue upgrade and associated works on the MPW Site. These works will continue to be managed under the MPE Stage 2 consent and CEMP documentation. The MPW Stage 2 CEMP will be inclusive of this area, however, management controls will not include the Moorebank Avenue upgrade or associated works, (Figure 1-1). Once these works are complete, the area will revert to management under this CEMP.

The objectives of this CEMP are to:

- Identify and implement relevant environmental legal and other regulatory requirements applicable to the construction works
- Identify the Project environmental management measures which will enable the Project to minimise and manage impacts on the environment and community
- Assign roles and responsibilities for the implementation, management and review process
- Provide a consistent and uniform approach to environmental management
- Provide all personnel working on the Project with sufficient information to undertake their works in accordance with the development consent conditions, contractual, legal and other relevant environmental requirements
- Provide a framework for training, development and support (systems, procedures and documentation) necessary to undertake the works
- Enable the commitments within the EIS process to be captured and implemented on-site.



LEGEND

- MPW Stage 2 construction area
- Moorebank Avenue site
- Existing railway
- Watercourse

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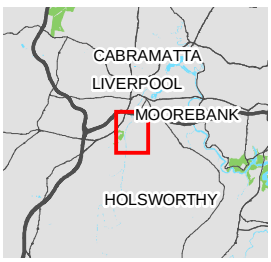


Figure 1-1: Site Location

1.1.2 Stakeholder Consultation

The aspect specific CEMP sub-plans were produced in consultation with relevant stakeholders identified in the CoC. A summary of the stakeholders consulted during preparation of the plans is provided within each sub-plan. No stakeholder consultation is required in the preparation of this CEMP.

1.1.3 CEMP and Sub-Plans

A summary of the construction environmental documentation required to as part of the CEMP, and the source of that requirement (SSD 7709, EPBC 2011/6086 and SSD 7709 FCMM) is provided in Table 1-1.

In accordance with the EPBC Act Approval (EPBC 2011/6086), Condition of Approval (CoA) 17, this CEMP and relevant sub-plans will be provided to DAWE within one month of their approval by DPIE. CEMP sub-plans required for approval by DAWE are the Construction Flora and Fauna Management Plan (CFFMP) (CoA 7) and Contamination Management Plan (CMP) including the Per- and Poly-Fluoroalkyl Substances (PFAS) Management Plan (CoA 8) which must be approved prior to the commencement of construction.

In accordance with CoC A37(d), this CEMP and relevant sub-plans as required under the consent (SSD 7709) must be reviewed and endorsed by the Project's Environmental Representative (ER). Once endorsed by the ER, relevant CEMP and sub-plans will be submitted for the approval of the Secretary of DPIE in accordance with CoC C2, (see Table 1-1).

Construction will not commence until the CEMP and sub-plans are approved by the Planning Secretary in accordance with CoC C4.

Construction will be undertaken in accordance with the most recent, approved version of this CEMP and sub-plans.

Table 1-1 Management Plan Requirements

Document	DPIE (SSD 7709)	DAWE (EPBC 2011/6086)	DPIE (SSD 7709 – FCMM)
Construction Environmental Management Plan (CEMP)	✓ - CoC C2	✓ - CoA 2	✓ - FCMM 0B
Construction Soil and Water Management Plan (CSWMP)	✓ - CoC B29	✓ - CoA 8 & 9	✓ - FCMM 5A
Acid Sulphate Soils Management Plan	✓ - CoC B39	✓ - CoA 8	✓ - FCMM 6E
Construction Traffic and Access Management Plan (CTAMP)	✓ - CoC B113	✓ - CoA 5	✓ - FCMM 1A
Construction Noise and Vibration Management Plan (CNVMP)	✓ - CoC B134	✓ - CoA 6	✓ - FCMM 2A
Out of Hours Works Protocol	✓ - CoC B135(g)	×	×
Construction Flora and Fauna Management Plan (CFFMP)	✓ - CoC B154	✓ - CoA 7	✓ - FCMM 4A
Unexpected Finds Protocol	✓ - CoC B175	×	✓ - FCMM 6A, 9E & 10C
Contamination Management Plan (including PFAS Management Plan) (CMP)	✓ - CoC B164	✓ - CoA 8	×
Construction Air Quality Management Plan (CAQMP)	×	✓ - CoA 10	✓ - FCMM 3A

Document	DPIE (SSD 7709)	DAWE (EPBC 2011/6086)	DPIE (SSD 7709 – FCMM)
Construction Heritage Management Plan (European and Aboriginal) (CHMP)	×	✓ - CoA 11 & 12	×
Light Spill (Urban Design and Landscape Plan)	×	✓ - CoA 13	×
Community Communication Strategy (CCS)	✓ - A31	×	✓ - FCMM 14A
Construction Emergency Response Plan (ERP)	✓ - B194	×	✓ - FCMM 5E & 5H
Bushfire Risk Management Plan	✓ - B191	×	✓ - FCMM 13A
Construction Demolition and Waste Management Plan (CDWMP)	×	×	✓ - FCMM 12A

1.1.4 Distribution and Availability

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

1.1.5 Revision

The CEMP will be reviewed annually which may lead to revision of the document. The CEMP may be revised more regularly which may result from:

- Changes to the Development Consent SSD 7709
- Audits and inspections (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)
- Written direction by the Planning Secretary
- Complaints.

Revisions that are classified as Minor Amendments, in accordance with CoC A37(i) shall be issued to the ER who has been given the authority to approve/reject "minor" amendments to the CEMP. Minor amendments to the CEMP are those that:

- Comprise updating the CEMP or are of an administrative nature, and are consistent with the terms of the consent and the CEMP, CEMP sub-plans and monitoring programs approved by the Secretary
- Do not materially alter the outcomes, nature, scale and extent of the Project, such that planning modification would be required by DPIE
- Are not considered to carry an environmental risk greater than that considered in the approved Project EIS.

Where amendments are considered to be outside the definition of "minor" provided above, the CEMP will be submitted to DPIE for review and approval.

Only approved version of the CEMP and sub-plans will be implemented; approved versions will be uploaded to the project website in accordance with CoC C21. DAWE will be advised of their availability on the Project website within 1 month of their approval in accordance with CoA 15.

1.1.5.1 Changes to the CEMP and Sub-Plans

Proposed changes to the Project (i.e. to the design, construction methodology or location) will be assessed to determine the appropriate approval pathway. Classification of a proposed change will be determined through an "Accordance Assessment" process undertaken by the Principal's Representative for due diligence purposes. Change requests may be classified as negligible, minor, major or a modification.

The accordance assessment is an examination of the proposed change need, scope, scale and method to determine whether the proposed change is of "*minor environmental impact"* and "*in accordance with"* the planning approval documentation (i.e. the EIS/RtS, CoC and this CEMP), or if the proposed change constitutes a modification to the consent under Section 4.55 of the EP&A Act.

This assessment process has been prepared to facilitate the review and approval of Requests for Minor Amendments (RfMA) to the CEMP and associated sub-plans and involves:

- Preparation of an Accordance Assessment (where required), developed by the Principal's Representative to assess the proposed change and satisfy themselves that the change is in accordance with the documents listed in CoC A3
- Submission of an RfMA by the Principal's Representative to the ER to update the CEMP and sub-plans
- ER review of RfMA supported by Accordance Assessment (where required) and subsequent approval of the RfMA and the CEMP and sub-plans under CoC A37(i) updated accordingly.

The term "Minor Amendment" as it relates to this process is defined above (Section 1.1.5). Consideration of 'Minor Amendments' is also given to consistency with relevant Commonwealth CoA.

A modification may be necessary where:

- Changes in the project are in direct conflict with a CoC / CoA
- Change of the construction footprint are beyond the EIS and / or RtS Proposal site
- Changes in the design are not generally in accordance with the EIS or CoC / CoA
- Changes result in impacts that are inconsistent with, or significantly greater than those identified in the approvals documentation.

1.1.6 Submission of CEMP Sub-Plans

This CEMP has been prepared to consider all delivery phases of construction for this Project.

This CEMP and associated sub-plans will be submitted to DPIE a minimum of one month prior to the commencement of construction. In accordance with CoC C8, the strategies, plans and programs required under the Development Consent will be reviewed within three months of the:

- Submission of an incident report under CoC C10
- Submission of an Independent Audit under CoC C17
- Approval of any modification of the conditions of this consent
- Issue of a direction of the Planning Secretary under CoC A3(b) which requires a review.

DPIE 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.

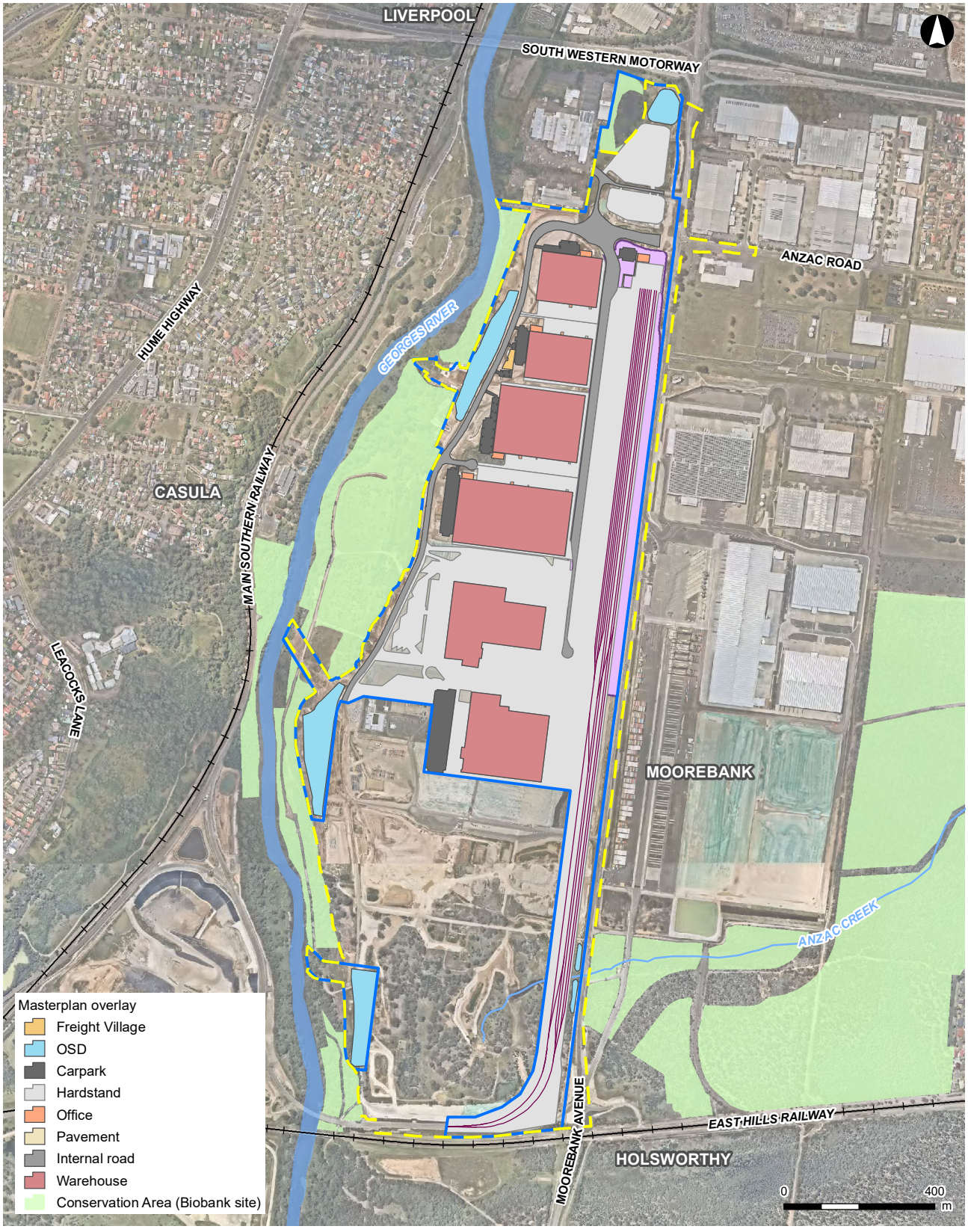
1.2 Project Description

The Project site is located approximately 27 km south-west of the Sydney Central Business District and approximately 26 km west of Port Botany. The Project site is situated within the Liverpool Local Government Area, in Sydney's South West Sub-Region, approximately 2.5 km from the Liverpool City Centre.

The Project involves the construction and operation of a multi-purpose IMT facility, Rail link connection, warehousing, freight village, and upgrades to the Moorebank Avenue and Anzac Road intersection. Details on the key components of the Project include:

- Construction and 24/7 operation of an IMT facility to support a container freight throughput volume of 500,000 twenty-foot equivalent units (TEUs) per annum, including:
  - A rail terminal with nine rail sidings and associated locomotive shifter
  - 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)
  - A rail and truck container loading and unloading and container storage areas
  - Truck waiting area and emergency truck storage area
  - 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 movements 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 of 215,000 m^2 and, for each warehouse, associated offices, staff amenities, hardstands and truck and light vehicle parking
  - Construction of Warehouse 5 and 6 to a maximum of 45m height and allowance for the storage of Dangerous Goods on-site
  - 800 m^2 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 basins, 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 1,600,000 m^3 of uncompacted fill, temporary stockpiling and placement over the entire site to raise existing ground levels by up to 3 m
  - 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 Project overview is shown in Figure 1-2, and the indicative location of the Project construction compounds and stockpiles area at the commencement of construction are shown in Figure 1-3.



LEGEND

- MPW Stage 2 construction area
- MPW Stage 2 operational area
- IMT facility area
- Rail link connection
- Existing railway
- Watercourse

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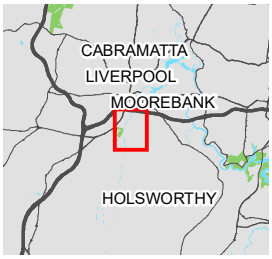
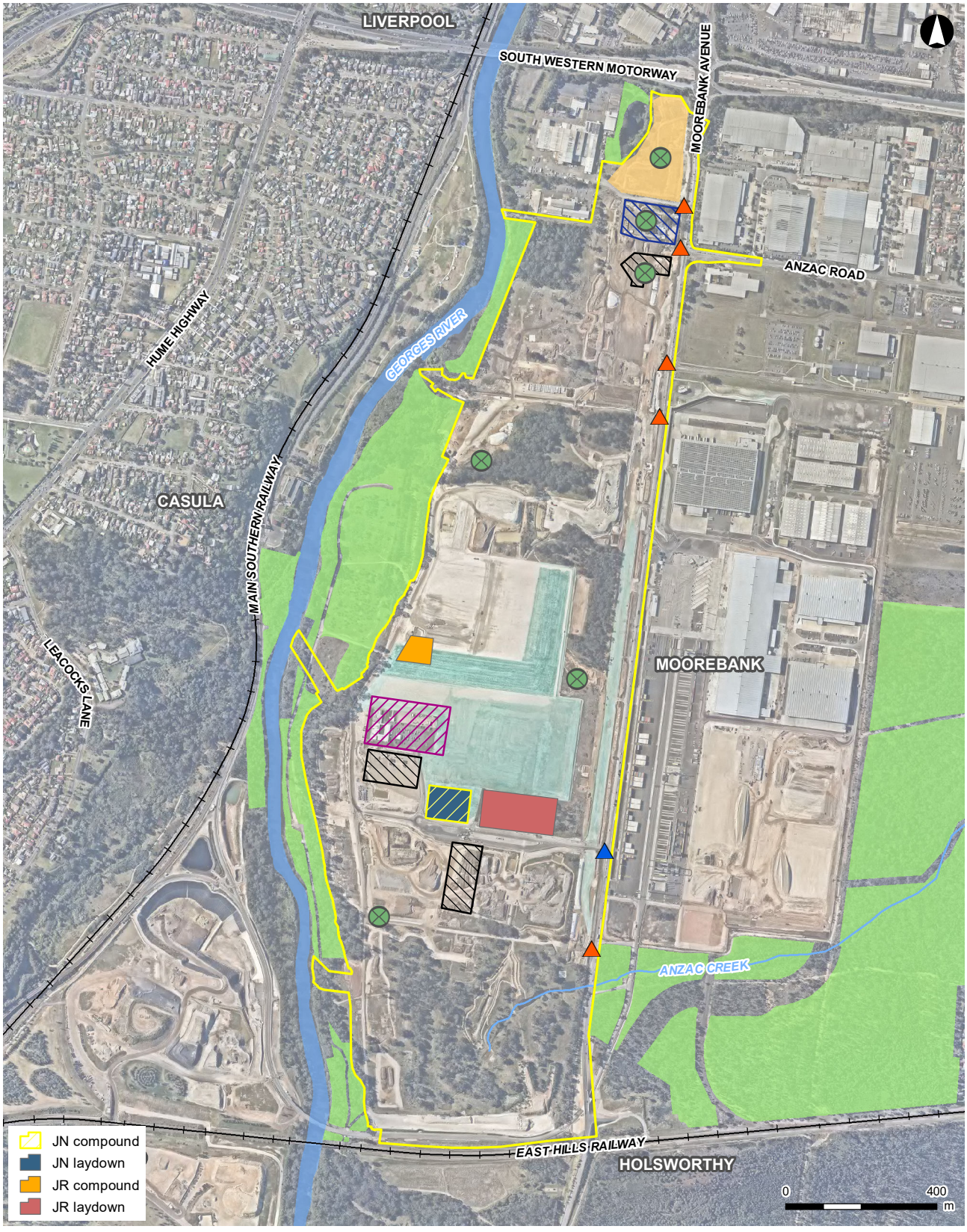


Figure 1-2: Project Overview



LEGEND

- MPW Stage 2 construction area
- ACM stockpiling area
- Main compound
- MAUW compound
- Additional compound
- Biobank offset site
- Satellite construction compound - Earthworks
- Construction site access
- Future construction site access
- Existing railway

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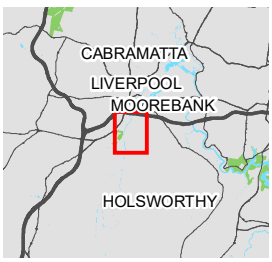


Figure 1-3: Indicative Earthworks Construction Compounds and Construction Area Locations

1.2.1 Construction Activities

Construction of the Project is anticipated to be approximately 36 months. Construction works have been divided into delivery phases which are interrelated and may overlap. The terminology for the Project delivery phases or periods has been developed from the approved EIS and RtS documentation.

The project delivery phases and the equivalent CoC and RtS phases are provided in Table 1-2. This list of works does not represent the sequencing of activities. Timing of activities will be largely driven by the application of the relevant CoC.

Table 1-2 Project Delivery Phase Terminology

Works Activity	Project Delivery Phase	MPW Stage 2 RtS Equivalent
Pre-Construction	Site Preparation	Works period B – Site preparation activities
Construction	Benching	Works period C – Bulk earthworks, drainage and utilities Works period A - Pre-construction stockpiling and filling
	Roads	Works period D – Moorebank Avenue intersection works and internal road network
	Terminal and Rail	Works period E – IMT facility and Rail link connection construction
	Warehousing	Works period F – Construction and fit-out of warehousing and freight village
		Works period G – Miscellaneous structural construction and finishing works

1.2.1.1 Pre-Construction Activities

A summary of the Pre-Construction activities includes, but are not limited to:

- Site surveying including, but not limited to, the installation of survey equipment such as survey controls, repeater stations, environmental monitoring equipment and construction monitoring equipment
- Investigations including, but not limited to, investigative drilling, contamination investigations and excavation
- Property acquisition adjustments including installation of property fencing, and relocation and adjustments of utilities to property including water supply and electricity
- Relocation and connection of utilities which have a minor impact to the environment and sensitive receivers as determined by the ER (Section 1.1.5.1)
- Heritage salvage in accordance with the Aboriginal Sites Salvage Strategy (CoC B144)
- Vegetation clearing required to conduct remediation but only following the approval of the:
    - CMP (CoC B164)
    - CFFMP (CoC B154)
    - Koala Management Plan (CoC B152).
- Maintenance of existing buildings and structures including pre-established erosion and sediment controls
- Establishment of exclusion zones
- Installation of temporary sediment and erosion control measures where required to undertake Pre-Construction Activities (pre-construction stockpiling and filling is not a pre-construction activity)

- Installation of temporary construction compounds, including amenities and office for bulk earthworks. The locations of these compounds have been provided in Figure 1-3 and are indicative and subject to confirmation by the Construction Contractor.

1.2.1.2 Benching

Bulk earthworks, drainage and utility activities include, but not limited to:

- Establishment of temporary stockpiling pads and associated temporary access roads
- Establishment of temporary batch plant sites and installation of batch plant if required
- Importation, stockpiling and placement of clean fill (bulk earthworks) and raising of the Project site to final level
- Importation, placement and compaction of engineered fill, which is comprised of virgin excavated natural material (VENM), excavated natural material (ENM) or other material approved in writing by the NSW Environment Protection Authority (EPA)
- Importation of construction materials
- Installation of erosion and sediment controls
- Installation of on-site detention basins
- Drainage and utilities installation.

1.2.1.3 Roads

Moorebank Avenue Upgrade Works are excluded from the scope of MPW Stage 2 and will be undertaken within MPE Stage 2 (SSD 7628). Road works associated with the Project comprise Moorebank Avenue intersection works and internal road network activities which include, but are not limited to:

- Establishment of traffic management devices
- Installation of erosion and sediment controls
- Relocation, adjustment and/or protection of all affected utilities, services and signage, as required
- Stripping and stockpiling of topsoil by excavators and trucks
- Drainage works
- Progressive stabilisation of exposed areas
- Preparation of new lane surfaces
- Forming of new kerbs, gutters, medians and other structures
- Application of asphalt and concrete pavement
- Landscaping of exposed earthworks areas
- New line marking, lighting and sign posting
- Removal of construction traffic management and opening of new works to traffic
- Establishment of construction access roads, site entry and exit points and security.

It is noted that in accordance with CoC B110A, provision will be made to use/reinstate for use, the Chatham Avenue/Moorebank Avenue intersection, as an operational access in the event that the Moorebank Avenue and Anzac Road Intersection is not available. Should this not be possible an alternative arrangement would be agreed in writing with Transport for NSW.

1.2.1.4 Terminal and Rail

IMT facility and rail link connection construction activities include, but not limited to:

- Importation, placement and compaction of engineering fill
- Compaction of engineering fill
- Importation and placement of ballast material
- Establish formwork and reinforcement for sidings and bridge infrastructure
- Placement of concrete, curing and sealing
- Installation of permanent rail systems
- Installation of permanent access gates, security gatehouse and permanent fencing
- Installation of the connection between the Rail link and the IMT facility sidings
- Erection of IMT facility administration building – excavation foundation and floor slab construction, structural wall and roof framework, and roofing
- Internal fit-out of building with control room, office, workshops, loco-shifter and staff amenities
- Removal of construction traffic management and opening of new works to traffic.

1.2.1.5 Warehousing

Warehousing activities include, but not limited to:

Construction and fit-out of warehousing and freight village

- Establishment of construction compound, temporary fencing/ hoardings and temporary sediment and erosion control
- Installation of temporary site offices and amenities
- Excavation, foundation and floor slab installation
- Erection of framework and structural walls, including use of cranes
- Installation of roof, including use of cranes
- Internal fit out
- Landscaping
- Preparation of warehouse access road subgrade
- Forming of new kerbs, gutters, medians and other structures
- Placement of asphalt and concrete pavement
- New line marking, lighting and sign posting
- Removal of construction traffic management and opening of the internal road and warehouse access roads to traffic.

Miscellaneous structural construction and finishing works

- Decommissioning/demobilisation of the construction area
- Commissioning of operational facilities
- Landscaping
- Rehabilitation of affected areas
- Post-construction condition surveys
- Post-construction site survey
- Removal of construction environmental controls
- Removal of construction ancillary facility related traffic signage
- Removal of construction traffic management and opening of new works to traffic.

1.2.2 Construction Hours

In accordance with CoC B125 construction works will generally be undertaken during standard daytime construction working hours, being:

- 7:00 am to 6:00 pm Monday to Friday
- 8:00 am to 1:00 pm Saturday
- No works on Sunday or public holidays.

In accordance with CoC B126, highly noise intensive works[1] (including impulsive or tonal noise emissions) will only be undertaken as follows (except where permitted by the EPL[2]):

- Between the hours of 8:00 am to 5:00 pm Monday to Friday
- Between the hours of 8:00 am to 1:00 pm Saturday
- In continuous[3] blocks not exceeding three hours each, with a minimum respite from those activities and works of not less than one hour between each block.

Construction outside of the hours nominated above may be undertaken in the following circumstances (CoC B127):

a. Works that are inaudible at the nearest sensitive receivers
b. Where a negotiated agreement has been arranged with affected receivers
c. Works agreed to in writing by the Planning Secretary
d. For the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons
e. Where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm
f. Where they are undertaken in accordance with the Out-Of-Hours Work Protocol (CoC B135).

No blasting is permitted on the Project. For further details refer to the CNVMP.

1.2.3 Ancillary Construction Facilities

Construction compounds will be required to support construction of the Project. The locations of these compounds have been provided in Figure 1-3 and are indicative and subject to confirmation by the Construction Contractor. Minor ancillary facilities will be established when required in accordance with CoC A40 after assessment by the ER. CoC A40 states:

Minor ancillary facilities, including lunch sheds, office sheds, portable toilet facilities, and the like, can be established where they satisfy the following criteria:

a. *are located within the construction boundary; and*
b. *have been assessed by the ER to have:*
    i. *minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009),*

---

[1] *Highly noise intensive works include:*
(a) use of power saws, such as used for cutting timber, rail lines, masonry, road pavement or steel work;
(b) grinding metal, concrete or masonry;
(c) rock drilling;
(d) line drilling;
(e) vibratory rolling;
(f) rail tamping and regulating;
(g) bitumen milling or profiling;
(h) jackhammering, rock hammering or rock breaking; and
(i) impact piling

[2] *Section 4.42(1)(e) of the EP&A Act requires that an EPL be substantially consistent with this approval. Out-of-hours works considered under* ***Condition B127*** *must be justified and include an assessment of mitigation measures.*
[3] *Continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work that is the subject of this condition*

traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and

ii. *minimal environmental impact with respect to waste management and flooding, and*

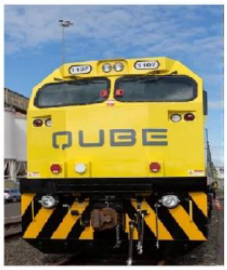
iii. *no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.*

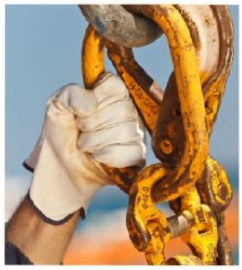
1.3 Environmental Policy

Qube's Safety, Health and Environmental Policy (Figure 1-4) describes the Project's commitments to continual improvement in environmental performance and compliance obligations. The Project and its nominated contractors will operate in accordance with this policy which will be:

- Displayed at prominent locations on the Project site
- Communicated to site personnel during induction and training
- Made publicly available and accessible to clients and concerned / interested members of the public.

All personnel associated with the Project, including sub-contractors, must comply with the spirit and intent of these policies.





Safety Health & Environment Policy

Qube is committed to providing a safe and healthy workplace, and ensures the protection of the environment.

Effective safety is a shared responsibility. Our commitment and encouragement of personal accountability is summarised by our program:

ZERO HARM

Zero Harm reflects our belief that we operate in an environment where risks are managed, and that work does not impact upon our people's health and wellbeing.

The Company demonstrates a commitment to ensuring the health and safety of all our workers and protection of the environment, by:

- Striving for continuous improvement by establishing safety and environment performance targets and then measure and monitor performance through effective audit programs.
- Providing resources which enable communication, the sharing of safety and environment knowledge and ideas, and effective consultation with Workers and other Stakeholders.
- Ensuring relevant legislative and regulatory compliance is achieved.
- Preventing injuries and environmental incidents through the implementation of the Qube Safety and Environment Management System based on hazard management principles (hazard identification, risk assessment, hazard control and review).
- Ensuring all incidents are reported and investigated to prevent recurrence and serious incidents are reported to relevant state authorities.
- Implementing effective injury management to reduce the personal and financial cost of work related injuries.

Environmental Management

Through the adoption and promotion of sound and sustainable environmental practice in business, it is Qube's objective to be the company of choice in creating value for workers, shareholders, business partners, customers and suppliers, by:

- Managing day to day operations in a manner that seeks to prevent any harmful impact on the environment
- Complying with and aim to exceed all applicable environmental legislation nationally
- Implementing and maintaining an Environmental Management System that

conforms with or exceeds AS/NZS ISO 14001:2004

- Promote leadership in environmental protection through employee training and support for third party educational and training initiatives
- Develop business, community and political relationships with like-minded partners to foster a culture of environmentally sustainable growth and development
- Communicate proactively, promptly and transparently with all stakeholders, the community, media and government on environmental issues
- Engage proactively in thought leadership, development, implementation and promotion of new environmentally sustainable business practices

Maurice James

Issue Date: 28.04.2016
Review Date: 28.04.2018

QH-SHE-PO-012 (Version 1.0)

Figure 1-4 Qube Environmental Policy

1.4 Project Objectives and Targets

Project objectives and targets have been developed incorporating the governance, social and environmental aspects of sustainable development. Corresponding reporting and monitoring requirements are detailed in Table 1-3.

Table 1-3 Project's Objectives and Targets

Objective	Indicator	Target	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP Reference
Governance and Management						
Construct the Project in accordance with environmental approvals	• # non-compliances	• Zero non-compliances at each quarterly construction compliance reporting stage	• Audits • Construction compliance reporting • Management review	Construction Contractor	Quarterly	Section 2 Section 4
Compliance with all relevant legislative requirements	• # of infringements • # of formal regulatory warnings	• Zero regulatory infringements (penalty notices or prosecutions) • Zero formal regulatory warnings	• Audits • Construction compliance reporting • Management review	Construction Contractor	End of Project	Section 1.1
Minimise the potential for environmental incidents	• Environmental Incident Frequency Rate (EIFR)	• Class 2 or Class 3 EIFR of <1	• Monthly reports	Construction Contractor	Monthly	Section 2.8
Manage the impacts of our supply chain	• Supplier evaluations	• Supplier evaluation through use of multi-criteria analysis or other scored means	• Monitoring of supply contracts • Monthly reports	Construction Contractor	Monthly	Section 2.5.4
Minimising Social Impacts						
Proactively engage with the Project team	• # inspections accompanied by supervisory or engineering personnel	• 50% of project environmental inspections accompanied by Contractor's Environmental Manager (EM)	• Monthly reports • Weekly environmental inspections	Contractor's EM	Weekly	Section 4.2
	• # of inspections signed off	• 100% of weekly environmental inspections signed off	• Monthly reports • Weekly environmental inspections	Contractor's Project Manager (PM)	Weekly	Section 4.2

Objective	Indicator	Target	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP Reference
	• # of environmental toolbox talks per month	• Minimum one environmental tool box per month	• Training records	Construction Contractor	Monthly	Section 2.7
Support local health and amenity	• # of environmental complaints per month • Actual response time for each complaint • # of complaints resolved as a % of # complaints received	• Receive less than three substantiated environmental complaints per month • Complainant contacted within four hours of receiving complaint • Complainant concerns adequately resolved such that prevention of perceived or potential human health and/or environmental impacts are achieved.	• Complaints form • Incident register	Construction Contractor Elton Consulting (Community Engagement Consultant)	Monthly	CCS
Minimising Environmental Impacts						
Protect biodiversity	• # of environmental incidents relating to threatened species	• No harm to any threatened species	• Weekly environmental inspections	Construction Contractor	Daily	Appendix K - CFFMP
Minimise waste production	• % of total construction and demolition waste recycled	• 90% of construction and demolition waste to be recycled	• Waste tracking spreadsheet	Construction Contractor	Monthly	Appendix O- CDWMP
	• % of spoil beneficially re-used on site • % of spoil beneficially reused locally	• 100% of spoil beneficially reused on-site or locally (not including contaminated material)	• Waste tracking spreadsheet	Construction Contractor	Monthly	Appendix O - CDWMP
	• % of office waste recycled	• >60% of office waste recycled	• Waste tracking spreadsheet	Construction Contractor	Monthly	Appendix O - CDWMP

Objective	Indicator	Target	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP Reference
	• % of topsoil retained as productive	• 95% Topsoil to remain productive	• Waste tracking spreadsheet	Construction Contractor	Monthly	Appendix O - CDWMP
Minimise energy consumption and emission of greenhouse gasses	• Business as usual defined Greenhouse Gases (GHG) Scope 1 and Scope 2 emissions • % reduction of Scope 1 and Scope 3 GHG emissions against defined benchmark	• >15% reduction of Scope 1 and Scope 2 GHG emissions against a modelled business as usual scenario	• Monthly online reporting of energy and fuel usage	Construction Contractor	Monthly	**NA**
	• % renewable energy used on site	• >20% renewable energy usage on site	• Monthly online reporting of energy and fuel usage	Construction Contractor	Monthly	**NA**
Use of sustainable materials	• % reduction in embodied energy in construction materials used achieved against defined benchmark	• >15% reduction in embodied energy in construction materials based on a business as usual scenario	• Concrete specifications • Energy consumption register	Construction Contractor	Monthly	**NA**
Effectively manage water consumption	• % reduction achieved against defined benchmark	• >10% reduction in water usage against a modelled business as usual scenario	• Water consumption register • Weekly environmental inspection • Monthly reports	Construction Contractor	Monthly	Appendix F - CSWMP

Objective	Indicator	Target	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP Reference
	• % non-potable use achieved against defined benchmark	• >33% non-potable water usage against a modelled business as usual scenario	• Weekly environmental inspection • Monthly reports	Construction Contractor	Monthly	Appendix F - CSWMP
Minimise visual impacts	• Number of complaints during construction regarding light spill from temporary lighting	• Receive no substantiated environmental complaints	• Daily inspections (during out of hours works) • Weekly inspections at all other times	Construction Contractor	Daily	Appendix P– Light Spill Management CCS

2 ENVIRONMENTAL FRAMEWORK

2.1 Environmental Management Systems

Qube's EMS is part of an overarching management system which is known as SHEMS (Safety Health and Environmental Management System). The SHEMS provides the process and policy that govern all on-site and offsite activities. The SHEMS assists in the management of all construction activities from a safety, health and environmental management perspective. It is within this framework that the EMS exists. The EMS is built on ISO 14001:2015 and has third party accreditation. Qube's EMS provides the framework for reporting and documentation of environmental activities and this plan references relevant parts of Qube's EMS.

2.2 Environmental Management Documentation

This CEMP is the overarching management plan for a suite of environmental management documents for the Project. It provides a structure and systematic approach to environmental management and aligns to the EMS.

Figure 2-1 shows the structure of the suite of environmental management documents that are applicable to the Project.

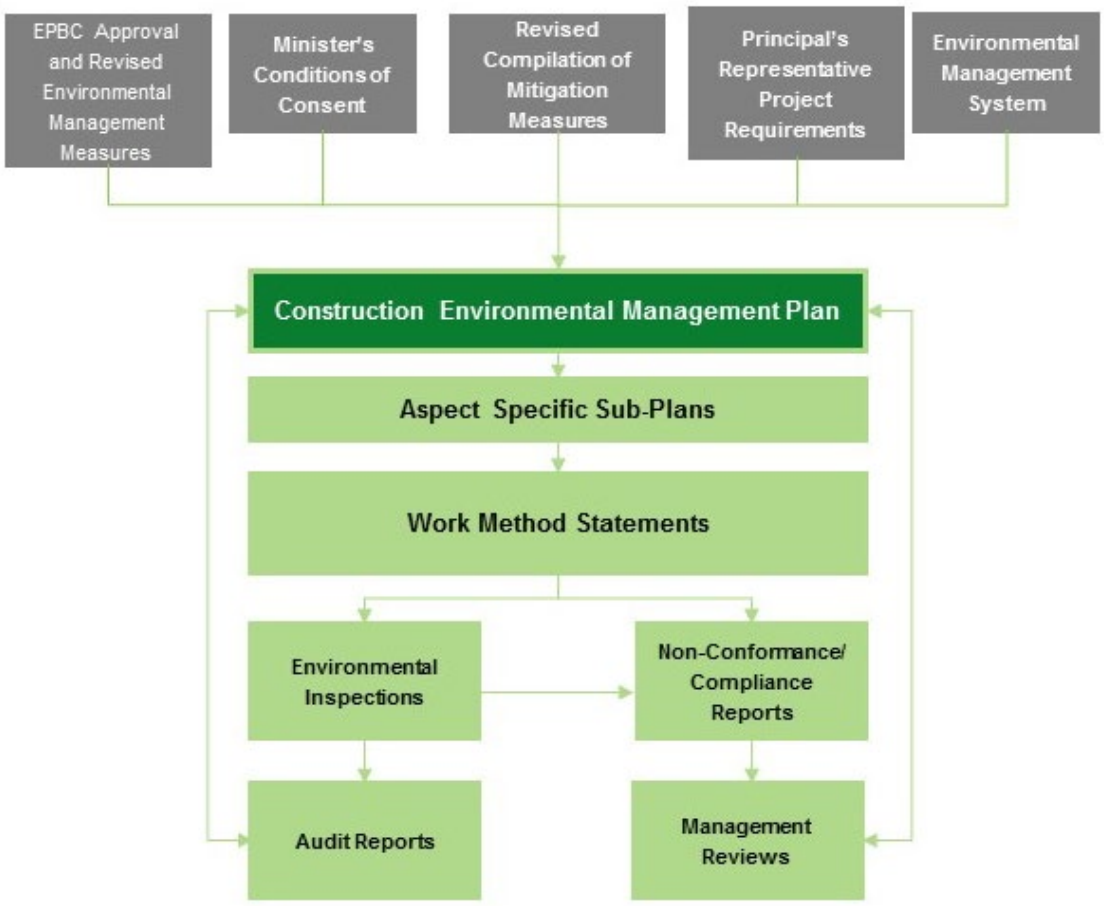


Figure 2-1 Environmental Management Documentation

2.3 Document Control and Records

All Project documentation, including environmental records, will be controlled in accordance with the SHEMS document control system and the Project contractual requirements. Aconex will be used to store records, documents and plans.

Environmental records will be kept as objective evidence of compliance and conformance with environmental requirements, filed in Aconex and made available to relevant Project personnel. The controlled records and documentation retained on Aconex are the versions to be relied upon in determining compliance and performance.

Relevant sub-plans and WMS will be made available to those personnel who are responsible for their implementation. The Contractor's EM will enable their current issued documentation to be produced or made available.

Documentation will be maintained in a legible manner, dated (with dates of revision) and readily identifiable. Relevant documentation will be uploaded to the Project website.

2.4 Legislative Requirements

The regulatory framework for the Project is outlined within the Compliance and Obligations Register (refer to Appendix A). This register identifies relevant legislative instruments, their key objectives and relevance to the Project, including legislative and voluntary obligations, permits and licences, standards and guidelines, and relevant CoA, CoC and management measures.

Where updated or revised versions of guidelines, protocols, standards or policies, or a replacement of them are available, the most recent versions should be applicable to this Plan.

2.4.1 Development Approval

The Project has been approved under both the EP&A Act and the EPBC Act. Both these approvals have environmental conditions relevant to the construction works for the Project, which are discussed below. In the compliance tables, Primary Conditions are specific to the development of the management plan, while Secondary Conditions are conditions which are related to the environmental aspects associated with the plan; secondary conditions are included within Appendix A.

2.4.1.1 EPBC Act Approval

The EPBC Act approval for the MPW Concept was granted by DotEE (now DAWE) in September 2016 (No. 2011/6086). This approval was provided for the impact of the MPW Project on listed threatened species and communities (Sections 18 and 18A of the EPBC Act) and Commonwealth action (Section 28 of the EPBC Act).

The construction and operation of the Project has been designed to be consistent with the EPBC Act Approval (EPBC 2011/6086) conditions, where relevant. EPBC Act Approval (EPBC 2011/6086) conditions for the Project include specific conditions and commitments that are required to be addressed in this CEMP. These conditions are identified within Table 2-1 and Appendix A, along with where they have been addressed in preparing this CEMP.

Table 2-1 Commonwealth Approvals

CoA	Requirement	CEMP Section
Primary Condition		
2	For the protection of the environment, including listed threatened species and communities, the person taking the action must prepare a construction environmental management plan (CEMP) addressing at least the elements outlined in Conditions 5 to 13. Apart from early works as described in Condition 3, construction must not commence until all specified CEMP approvals have been obtained in writing, and once approved, the CEMP must be implemented. The CEMP may be prepared in stages, in which case the corresponding stage must be clearly defined, and construction of that stage must not commence until all specified approvals have been obtained in writing.	CFFMP – Section 2.1.1 Appendix K – CFFMP

Revised Environmental Management Measures (EPBC REMM) are presented in the MIT Final EIS prepared to satisfy the Commonwealth approval process (EPBC Final EIS) dated Dec 2015. The EPBC REMM are generally the same as the REMM presented in the Supplementary Response to Submissions Report for the

MPW Concept Proposal MOD 1 (Arcadis, 2017). The REMM relevant to this plan, and as comparable to MPW Stage 2 SSD 7709 CoC and FCMM are identified in Table 2-2.

The aspect specific REMM related to the CEMP, not already covered by the MPW Stage 2 FCMM (refer to Table 2-4), will be addressed in the aspect specific CEMP subplan(s).

Table 2-2 Revised Environmental Management Measures (REMM) and comparable FCMM

REMM No.	Requirement	How Addressed	Comparable CoC	Comparable FCMM
Primary Condition				
1B	EMPs including CEMPs and [Operational Environmental Management Plans] OEMPs (or equivalent) would be prepared for the Project. At this point, Provisional EMPs (included in Volume 2, Appendix H of the EIS) have been prepared and would be updated as more is known about the Project phasing including detailed design, construction and operation	Aspect specific CEMP subplans	CoC C2	FCMM 0B details the composition of the CEMP, and FCMM 0C details the composition of the OEMP
5D	Construction works outside of the standard construction hours identified in REMM 5C may be undertaken in the following circumstances: • construction works that generate noise that is: – no more than 5 dB(A) above rating background level at any residence in accordance with the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009); and – no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009) at other sensitive receivers; or • for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or • where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or • works approved through an EPL, or • works as approved through the out-of-hours work protocol outlined in the CEMP.	This CEMP Section 1.2.2	CoC B127	-
6A	Following detailed design and before construction, detailed flora and fauna mitigation measures would be developed and presented as part of the CEMP. These detailed measures would incorporate the measures listed in 6B to 6W. The CEMP would address:	CFFMP - Section 2.1.1	CoC B154	FCMM 4A

REMM No.	Requirement	How Addressed	Comparable CoC	Comparable FCMM
	• general impact mitigation; • staff/contractor inductions; • vegetation clearing protocols; • pre-clearing surveys and fauna salvage/translocation; • rehabilitation and restitution of adjoining habitat; • weed control; • pest management; and • monitoring. The plans would include clear objectives and actions for the Project including how to: • minimise human interferences to flora and fauna; • minimise vegetation clearing/disturbance; • minimise impact to threatened species and communities; • minimise impacts to aquatic habitats and species; and • undertake flora and fauna monitoring at regular intervals.			
6I	The potential for translocation of threatened plant species as individuals or as part of a soil translocation process would be considered during the detailed development of the CEMP.	CFFMP – Section 2.1.1	N/A	FCMM 4J
6R	The CEMP (or equivalent) would include detailed measures for minimising the risk of introducing weeds and pathogens.	CFFMP - 2.1.1 Appendix K- CFFMP	CoC B83	FCMM 4O
8C	A CEMP would be prepared by the contractor for all excavation and remediation works and would include requirements for decontamination facilities at the Project site.	Appendix K - CMP	CoC B161	Measures to mitigate potential geology, soils and land contamination impacts are provided in FCMM Section 6.
10A	A Dust Management Plan (DMP) (or equivalent) would be prepared as part of the CEMP.	CAQMP – Section 2.1.1 Appendix H - CAQMP	N/A	Procedures for controlling/managing dust are identified in FCMM 3A
10D	Activities with the potential to cause significant emissions, such as material delivery and load out and bulk earthworks, would be identified in the CEMP. Work practices that minimise emissions during these activities would be investigated and applied where reasonable and feasible.	CAQMP – Section 2.1.1	N/A	Initiatives to mitigate greenhouse gas emissions during construction are identified in FCMM 11B
18A	A construction waste management plan (or equivalent) would be prepared as part of the overall CEMP. This would implement key principles of relevant	CDWMP – Section 2.1.1	N/A	Mitigation measures to manage waste during construction

REMM No.	Requirement	How Addressed	Comparable CoC	Comparable FCMM
	waste guidelines, and the waste management hierarchy of reduction, reuse, recycling and recovery.	Appendix O - CDWMP		are identified in FCMM 12A

2.4.1.2 EP&A Act Approval

The Project is being delivered under Part 4, Division 4.7 of the EP&A Act. The SSD 7709 CoC include requirements to be addressed in this CEMP and delivered during the Project. These requirements, where and how they are addressed, is provided within Table 2-3. Relevant CoC related to MOD1 are provided in Appendix A4 and/or the relevant aspect specific sub-plan.

Table 2-3 Conditions of Consent (CoC)

CoC	Requirement	CEMP Section	How Addressed
Primary Conditions			
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include	This CEMP Section 1.4	This CEMP has been prepared to meet the Project's regulatory and policy requirements in a systematic manner and to continually improve the Project's environmental performance. The nominated sub-plans have been prepared in accordance with the applicable CoC.
	(a) detailed baseline data;	N / A	Baseline data is included in aspect specific sub-plans where applicable
	(b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Section 2.4 Appendix A – Compliance and Obligations Register	Legislation, permits and licences applicable to the Project have been identified within this CEMP.
	(ii) any relevant limits or performance measures and criteria; and	Section 1.4	Relevant limits or performance measures/criteria are outlined in Section 1.4.
	(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;	Section 1.4 Individual aspect specific sub-plans	The Project objectives and targets are detailed in Section 1.4 which provide performance indicators for the Project.
	c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 2 Section 3 Individual aspect specific sub-plans	Section 2 and Section 3 of this CEMP include environmental management practices and procedures to be followed during construction. Section 3.2 indicates that environmental measures to ensure compliance with relevant statutory requirements, limits, performance measures and criteria are documented in the aspect specific CEMP sub-plans.

CoC	Requirement	CEMP Section	How Addressed
			Aspect specific sub-plans will include additional detail. Refer to Aspect and Impacts Register (Appendix B) for identified environmental aspects and a reference to the relevant aspect specific sub-plans, where appropriate.
	(d) a program to monitor and report on the: (i) impacts and environmental performance of the development;	Section 4 Individual aspect specific sub-plans	Environmental performance of the Project will be monitored in accordance with Section 4 of this CEMP, and in accordance with the monitoring activities identified in the relevant aspect specific sub-plans.
	(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Section 4.2 Section 4.5 Individual aspect-specific sub-plans	The effectiveness of management measure implementation will be determined during site inspections and observations detailed in Section 4.2 and reviewed in line with Section 4.5 during the annual management review.
	(e) a contingency plan to manage any unpredicted impacts and their consequences;	Appendix D – Unexpected Finds Protocol Individual aspect specific sub-plans	Appendix D outlines the Unexpected Finds Protocol. Relevant aspect specific sub-plans include measures to manage any unpredicted impacts and their consequences.
	(f) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 4.5	Review and improvement of this plan will be undertaken annually and periodically in accordance with Section 4.5 of this plan.
	(g) a protocol for managing and reporting any: (i) incidents and non-compliances (specifically including any exceedance of the impact assessment criteria and performance criteria);	Section 2.8	Managing and reporting for incidents will be undertaken in accordance with Section 2.8 of this plan.
	(ii) complaints;	Section 2.6.3 CCS	Protocols for managing and reporting complaints is outlined in Section 2.6.3. Further detail is found in Appendix B of the CCS.
	(iii) failure to comply with statutory requirements;	Section 4.4	Non-compliances will be undertaken in accordance with Section 4.4 of this plan.
	(h) roles and responsibilities for implementing the plan; and	Section 2.5	Section 2.5 provides details on the roles and responsibilities of all project personnel implementing this CEMP.
	(i) a protocol for periodic review of the plan.	Section 4.5	Periodic review of the plan will occur and is outlined in Section 4.5 of this plan.

CoC	Requirement	CEMP Section	How Addressed
	Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for a particular management plan.	Section 2.5	Roles and responsibilities specific to the application of this CEMP are detailed in Section 2.5
C2	The Applicant must prepare a **Construction Environmental Management Plan (CEMP)** in accordance with the requirements of **condition C1** and submit it to the Planning Secretary for approval.	This Plan	This CEMP has been prepared in accordance with the requirements of these CoC
C3	As part of the CEMP required under **Condition C2** of this consent, the Applicant must include the following: (a) **Soil and Water Management Plan** (see **Condition B29**); (b) **Acid Sulfate Soils Management Plan** (see **Condition B39**); (c) **Construction Traffic and Access Management Plan** (see **Condition B113**); (d) **Construction Noise and Vibration Management Plan** (see **Condition B134**); (e) **Out-of-hours Work Protocol** (see **Condition B135(g)**); (f) **Construction Flora and Fauna Management Plan** (see **Condition B154**); and (g) **Unexpected Finds Protocol(s)** (**see Condition B175**).	Section 1.1.6 Refer to specific sub-plan	The listed sub-plans have been prepared in accordance with the CoC.
C4	The Applicant must: (a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and (b) carry out the construction of the development in accordance with the CEMP approved by the Secretary, and as revised and approved by the Secretary from time to time.	Section 1.1.3	Construction activities will not commence until the CEMP is approved by the Secretary. Activities will be undertaken in accordance with the most recent, approved version of the CEMP.
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;	Section 1.1.6	The review and submission process for the CEMP will be undertaken in accordance with this condition, as described in Section 1.1.6

CoC	Requirement	CEMP Section	How Addressed
	(c) the approval of any modification of the conditions of this consent; or (d) the issue of a direction of the Planning Secretary under condition A3(b) which requires a review; 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.		
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 must be submitted to the Planning Secretary for approval within six weeks of the review. ***Note:*** *This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.:*	Section 1.1.5	Section 1.1.5 details revision and submission requirements.

The management and mitigation Measures referred to in SSD 7709 CoC A3(d) (Appendix 2) are provided as the Final Compilation of Mitigation Measures (FCMM) (Arcadis, November 2018). A list of the FCMM as relevant to the Project and how they have been complied within this CEMP are provided in Table 2-4.

Table 2-4 Final Compilation of Mitigation Measures (FCMM)

FCMM	Requirement	How Addressed
Primary Conditions		
0B	The Construction Environmental Management Plan (CEMP), or equivalent, for the Proposal would be based on the PCEMP (Appendix I of this EIS), and include the following preliminary management plans: • Preliminary Construction Traffic Management Plan (PCTMP) (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 CEMP would include the following sub-plans: • Construction Traffic Management Plan (CTMP) • Construction Noise and Vibration Management Plan (CNVMP), prepared in accordance with the Interim Construction Noise Guideline • Cultural Heritage Assessment Report/Management Plan (CHMP)	All nominated plans have been prepared as sub-plans to the CEMP or as stand-alone documents. The CCS has been prepared in place of the Community Information and Awareness Strategy. Appendix N - CCS

FCMM	Requirement	How Addressed
	• Construction Air Quality Management Plan (CAQMP) • Construction Soil and Water Management Plan (CSWMP), prepared in accordance with Managing Urban Stormwater, 4th Edition, Volume 1, (2004). • Erosion and Sediment Control Plan • Flood Emergency Response and Evacuation Plan (FERP) • UXO, EO, and EOW Management Plan • Acid Sulfate Soils Management Plan • Bushfire Management Strategy • Community Information and Awareness Strategy. • Flora and Fauna Management Plan (CFFMP) • Groundwater Monitoring Program (GMP) • Stockpile Management Protocol.	
4A	Following detailed design and before construction, detailed flora and fauna mitigation measures would be developed and presented as part of the CEMP. These detailed measures would incorporate the measures listed below. The CEMP would address: • general impact mitigation • staff/contractor inductions • vegetation clearing protocols including identification of exclusion zones • pre-clearing surveys and fauna salvage/translocation • rehabilitation and restitution of adjoining habitat • weed control • pest management • monitoring. The CEMP would include clear objectives and actions for the Proposal including how to: • minimise human interferences to flora and fauna • minimise vegetation clearing/disturbance • minimise impact to threatened species and communities • minimise impacts to aquatic habitats and species • undertake flora and fauna monitoring at regular intervals	Appendix K – CFFMP
4J	The potential for translocation of threatened plant species as individuals or as part of a soil translocation process would be considered during the detailed development of the Environmental Work Method Statements and CEMP.	Appendix K – CFFMP
4O	The CEMP (or equivalent) would include detailed measures for minimising the risk of introducing weeds and pathogens for construction related vehicles and equipment.	Appendix K – CFFMP
4P	The CEMP and OEMP for the Proposal would consider and have reference to the weed removal and riparian vegetation restoration undertaken within parts of the Georges River corridor under the MPW Concept Approval (identified within the Biodiversity Offset Package for the MPW Projects).	Appendix K – CFFMP
6A	The CEMP would identify the actions to be taken should additional contamination be identified during the development of the site (i.e. an unexpected finds protocol), and will address REMM items 8H, 8T, 8U, 8V and 8W (of the MPW Concept Approval (SSD 5066)).	Appendix L – CMP Appendix D – Unexpected Finds Protocol
6C	The CEMP would include the preparation of a site wide UXO, EO, and EOW management plan (or equivalent) based on the UXO Risk Review and Management Plan (G-Tek, 2016). This plan would be implemented to address the discovery of UXO or EOW during construction, to ensure a safe environmental for all staff, visitors and contractors.	Appendix L – CMP Appendix D – Unexpected Finds Protocol

FCMM	Requirement	How Addressed
6D	An Asbestos in Soils Management Plan (AMP) is to be implemented as part of the CEMP in accordance with the Safe Work NSW requirements, including but not limited to: • The Guidelines for Managing asbestos in or on soil (2014), and • Codes of Practice - How to Safely Remove Asbestos (2011) and How to Manage and Control Asbestos in the Workplace (2016).	Appendix L - CMP
6E	An Acid Sulfate Soils Management Plan (or equivalent) would be prepared as part of the CEMP in accordance with the ASSMAC Assessment Guidelines (1998), for areas identified as being of low or high risk i.e. works within close vicinity of the Georges River (Figure 13-2 of this EIS). In addition, a risk assessment quantifying the risks associated with the volumes of soil to be disturbed, the laboratory results from ASS testing undertaken, the end use of the materials and the proximity to sensitive environments is to be undertaken. All offsite disposal would be in accordance with the NSW Waste Classification Guidelines Part 4: Acid Sulfate Soils (2009).	Appendix L - CMP
6K	The CEMP would include an Earthworks Specification, which would include details on earthworks material criteria, handling and placement requirements, embankment and cutting formation (including foundation, batter and benching requirements), unsuitable material and bridging layer requirements, conformance testing methods and acceptance criteria (e.g. for material acceptance and compaction control).	Appendix F - CSWMP
7A	The following measures would be included in the CEMP (or equivalent) to minimise hazards and risks: • Procedures for safe removal of asbestos • Provision for safe operational access and egress for emergency service personnel and workers would be provided at all times • An Incident Response Plan that would include a Spill Management Procedure.	Appendix L - CMP
9D	An Aboriginal Cultural Heritage Assessment Report (ACHAR) (also known as Cultural Heritage Management Plan) would be prepared as part of the CEMP for the Proposal and would outline ongoing management/mitigation measures relating to MA6 and MA7.	Appendix J - CHMP
10C	An unexpected finds protocol (or. equivalent), including a stop works procedure, would be included within the CEMP. If unexpected finds are identified during works, the stop works procedure would be followed and a suitably qualified archaeological consultant would be engaged to assess the significance of the finds and the NSW Heritage Council notified. In this instance, further archaeological work or recording may be required.	Appendix D – Unexpected Finds Protocol
11B	The following initiatives would be implemented, where reasonable and feasible, for mitigation of GHG emissions during construction: • Construction works would be planned to minimise double handling of materials • Construction/transport plans would be incorporated within the CEMP to minimise the use of fuel during construction • Fuel efficiency of the construction plant/equipment would be assessed prior to selection, and where practical, equipment with the highest fuel efficiency and which uses lower GHG intensive fuel (e.g. biodiesel) would be used • On-site vehicles would be fitted with exhaust controls in accordance with the Protection of the Environment Operations (Clean Air) Regulation 2010, as required and appropriate. • Regular maintenance of equipment would be undertaken to maintain good operations and fuel efficiency • Where practicable, trucks removing waste from the site or bringing materials to the site would be filled to the maximum amount allowable, depending on the truck size and load weight, to reduce the number of traffic movements required • The mitigation measures, management strategies and abatements opportunities (Section 18 of the EIS) would be reviewed and considered where appropriate for incorporation in the CEMP.	Appendix E - CTAMP

FCMM	Requirement	How Addressed
12A	The following mitigation measures would be implemented as part of the CEMP (or equivalent) for waste management: • Characterisation of construction waste streams in accordance with the NSW Waste Classification Guidelines • Management of any identified hazardous waste streams • Procedures to manage construction waste streams, including handling, storage, classification, quantification, identification and tracking • Mitigation measures for avoidance and minimisation of waste materials • Procedures and targets for re-use and recycling of waste materials	Appendix O - CDWMP
13A	The following actions would be considered for implementation, where reasonable and feasible, for mitigation of bushfire risk during construction: • A bushfire management strategy, or equivalent, would be prepared as part of the CEMP for the construction phase. The strategy would include: – Emergency response plans and procedures – All site offices and temporary buildings would have a minimum setback of 10 m to bushfire prone areas – All site offices would be accessible via access roads suitable for firefighting appliances similar to NSW Rural Fire Service category 1 tankers.	Appendix G - ERP
14A	A community information and awareness strategy would be included in the CEMP and would outline measures to maintain communication with the community and all relevant stakeholders throughout the construction process of the Proposal.	The CCS provides mechanisms to facilitate communication with the community and relevant stakeholders.

2.4.2 Permits and Licences

Permits and licences relevant to this Project are detailed in the Project Permits and Licences Register, included as Appendix A of this CEMP. The Permits and Licences Register will be revised and updated in conjunction with the management review outlined in Section 4.5 or when there has been a change to relevant legislation.

2.4.2.1 Environment Protection Licence

Construction and operation of the Project will be undertaken in accordance with the requirements of the *Protection of the Environment Operations Act 1997* (POEO Act). An EPL may be issued under Section 43(a) 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 21054) was issued for Moorebank Precinct on 4 June 2018 for the crushing, grinding and separating of >100,000 to 500,000 tonne (T) annual processing capacity. The following variations have been issued for EPL 21054 under the POEO Act Section 58:

- Variation notice number 1571681, issued on 18 April 2019
- Variation notice number 1582348, issued on 1 August 2019
- Variation notice number 1597271, issued on 22 October 2020

Table 2-5: Section 58 Licence 21054 variations and amendments

Date Issued	Variation Notice Number	Amendments
18 April 2019	1571681	• To include Extractive Activities as a scheduled and fee based activity • Update premises description

Date Issued	Variation Notice Number	Amendments
		• Limit the authorisation of activities to only those that have been approved under a SSD approval for the relative part of the premises • Addition of surface water licensed discharge points, limits, monitoring and reporting • Revision of the special condition regarding assessment of material processed under the licence to be referred to the Site Auditor prior to commencing works.
1 August 2019	1582348	• A2.1 - premises location updated to reflect most recent map supplied to EPA (no change to actual premises boundary) • A2.2 - Premises map updated to reflect most recent map supplied to EPA (including new discharge point 7) • P1.2 - Addition of licensed discharge point 7 • L2.4 - Amendment of table to include concentration limits for point 7 • L2.5 and L2.6 amended to include point 7 • M2.2 - Amendment of table to include monitoring requirements for point 7 • G2.1 amended to include point 7
22 October 2020	1597271	• A1.1 - extractive activities from the scheduled activity table removed • A2.1 - Lot and DP details updated and superfluous premises details removed as these are replaced by the map in condition A2.2 • A2.2 - premises location map replaced with updated licensed area • A3 - condition removed as ancillary activities not carried out and the categories are not consistent with those specified in schedule 1 of the Act • A5 - condition removed as not required • P1.1 - condition removed as not relevant • P1.2 - table updated to reflect updated premises map reference in condition A2.2 • O3 - standard dust control conditions added • O4 - standard emergency response condition added • E1 - crushing, grinding or separating conditions updated and amended for clarity • E2 - extractive activities condition removed because it is no longer relevant

A further variation (application number 1605300) is pending NSW EPA approval.

2.4.3 Other Requirements

This CEMP has been prepared in accordance with the Guidelines for the Preparation of Environmental Management Plans (DIPNR 2004) as demonstrated in Table 2-5.

Table 2-6 Guidelines for the Preparation of Environmental Management Plans Requirements

EMP Guideline Section		CEMP Section
Background	Introduction	Section 1.1
	Location	Section 1.2

EMP Guideline Section		CEMP Section
	Construction activities Timing and schedule	
	Project description	Section 1.2
	EMP context	Section 2.1 Section 2.2
	EMP objectives	Section 1.4
	Environmental policy	Section 1.3
Environmental Management	Environmental management structure and responsibility	Section 5
	Approval and licencing requirements	Section 2.4 Appendix A
	Reporting	Section 4.6
	Environmental training	Section 2.7
	Emergency contacts and responses	Table 2-9 Section 2.8
Implementation	Risk assessment	Section 3.1 Appendix B
	Environmental management activities and controls	Aspect specific CEMP sub-plans
	Environmental control plans or maps	Appendix C
	Environmental schedules	Environmental schedules (e.g. site inspection checklists, waste register, imported spoil tracking register) will be retained on the Project's document management system and/or included in aspect specific sub-plans where appropriate.
Monitor and review	Environmental monitoring	Section 4.1 Aspect specific CEMP sub-plans
	Environmental auditing	Section 4.3
	Corrective actions	Section 4.4
	EMP review	Section 4.5

Compliance with relevant legislation and industry best practice is often achieved through the adherence to relevant guidelines and standards. Guidelines and standards used during the compilation of this CEMP and aspect specific CEMP sub-plans include but are not limited to those detailed within the Obligations register (Appendix A). The most recent version of the applicable Australian Standard was used in the preparation of this CEMP and aspect specific CEMP sub-plans.

2.5 Roles and Environmental Responsibilities

2.5.1 CEMP Management Hierarchy

All Project personnel are responsible for the implementation of this CEMP and have the responsibility to stop works if there is potential for a safety or environmental incident to occur.

The interaction between the key organisations involved in environmental management is displayed in Figure *2-2*.

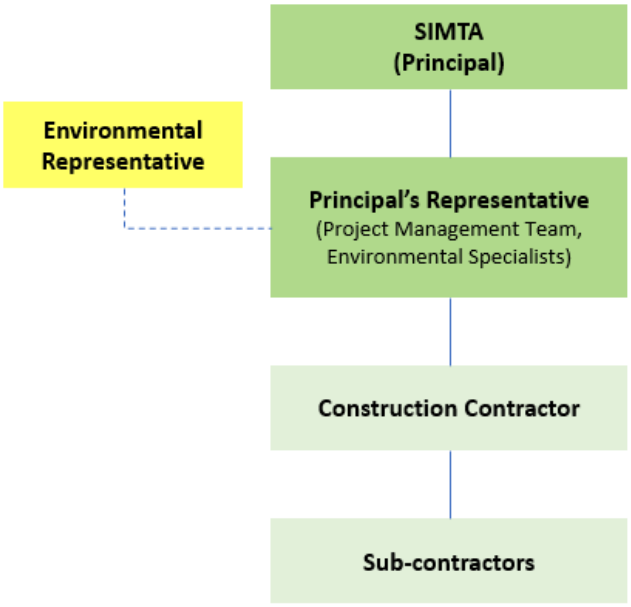


Figure 2-2 Organisational Chart

2.5.2 Principal's Representative and Community Engagement Consultant

For the purposes of this CEMP, the Principal's Representative is considered to consist of both the Project Management Team and a team of environmental specialists. The Principal's Representative is responsible for reviewing and assessing conformance and compliance of the Construction Contractor's works with the Project requirements.

Elton Consulting is the CEC for SIMTA and will act as the 'control tower' for all public communications; they will be the central contact to keep nearby residents informed of the progress of the development. General responsibilities of the Principal's Representative and the CEC are outlined within Table 2-6.

Table 2-7 Roles and Responsibilities of Principal's Representative and CEC

Role	Responsibility
SIMTA (Principal)	• Provide advice and leadership on environmental management
Principal's Representative (Project Management Team and Environmental Specialists)	• Manage and assist the contractors to meet their environmental responsibilities and minimise the potential for environmental incidents • Review the CEMP and sub-plans for adequacy • Review the Construction Contractor's environmental monitoring reports and compliance documentation to confirm that the CEMP and sub-plans are being implemented and remain adequate • Issue a stop work direction immediately where an unacceptable environmental impact may occur

Role	Responsibility
	• Liaise with the DPIE and other relevant regulators as required
Community Engagement Consultant (CEC)	• Manage the relevant enquiries and complaints in accordance with the CCS • Working with contractors in the organisation and delivery of community notifications and/or information dissemination • Reviewing contractor community relations materials, including notifications, letters, advertising, signs and factsheets • Monitoring, responding to and triaging Project calls and emails from community stakeholders • Working with Contractor's EM and Community Liaison Manager (CLM) on environmental complaints received from the public

2.5.3 Construction Contractor

The indicative roles and responsibilities of Project personnel are outlined below in Table 2-7. The Construction Contractor will provide roles and responsibilities to the Principal's Representative prior to the commencement of construction.

Table 2-8 Construction Contractor's Roles and Responsibilities

Role (or equivalent)	Key Responsibility
Contractor's Project Manager (Contractor's PM)	• Oversee the implementation and maintenance of the CEMP • Report to senior management and the Principal's Representative on the performance of the system and environmental breaches • Take action to resolve environmental non-conformances, non-compliances and incidents • Demonstrate that suppliers and sub-contractors are implementing Project environmental requirements • Report environmental incidents to the Principal's Representative • Authorise expenditure to implement environmental management requirements within limits of authority as defined in the Principal's Representatives Project requirements • Coordinate Incident Cause Analysis Method (ICAM) investigations • Review audit corrective actions and take action as necessary to ensure timely close out of issues • Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm • Employ apprentices in trade roles wherever possible.
Contractor's Construction Manager (Contractor's CM)	• Communicating with all personnel and sub-contractors regarding conformance with the CEMP and site-specific environmental issues/Environmental Work Method Statements • Identifying resources and competencies required for implementation of the CEMP • Organise and manage site plant, labour and temporary materials • Co-ordinating the implementation and maintenance of site environmental controls and provide support for the Contractor's EM • Report all environmental incidents in accordance with incident reporting protocol

Role (or equivalent)	Key Responsibility
	• Participate ICAM investigations • Take action to resolve non-conformances, non-compliances and incidents • Manage and direct works in an environmentally responsible manner that reduces environmental impacts or stop works if there is a risk of environmental harm • Managing and minimising water consumption, energy consumption, waste consumption and emission of greenhouse gases, wherever possible.
Contractor's Environmental Manager (Contractor's EM)	• Assist and guide the respective workers to meet their environmental responsibilities and minimise the potential for environmental incidents • Undertake regular environmental inspections including against implementation of management measures and environmental controls • Report to the Contractor's CM on environmental issues • Implement appropriate action to address any environmental incidents • Investigate and report on identified non-conformances and non-compliances • Ongoing identification and mitigation of environmental risks and notify the Principals Representative of any required change • Develop environmental components of site induction and ensure a register of attendance is maintained • Present and participate in toolbox meetings • Manage environmental document control, reporting, inductions and training • Oversee site monitoring, inspections and internal audits • Monitor and report on the environmental capability and performance of subcontractors • Participate ICAM investigations • Report environmental non-conformances, incidents and potential incidents to the Contractor's PM • Cooperate and participate in audits and action results of any audit findings.
Site Supervisors	• Effectively implement environmental controls on-site • Present and participate in toolbox talks and meetings • Report environmental non-conformances, incidents and potential incidents to the Contractor's EM and PM • Manage and direct works in a manner that minimises potential for environmental impacts or stop works if there is a risk of environmental harm
Contractor's Community Liaison Manager (Contractor's CLM)	• Implement the CCS • Assist the CEC in the management of the relevant enquiries and complaints in accordance with the CCS • Communicate results of complaint, audit report findings and incident investigations to the community and relevant stakeholders
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 • Take all feasible and reasonable steps to comply with the requirements of this CEMP • Comply with lawful management directions to prevent environmental harm or enhance protection of site environmental values

Role (or equivalent)	Key Responsibility
	• Stop works if there is a potential risk of material harm • Promptly report to management on any non-conformances, perceived non-compliances, or environmental incidents • Undergo induction and training in environmental awareness

2.5.4 Sub-Contractors

All sub-contractors are required to attend Project and / or site inductions where the requirements and obligations of the CEMP will be communicated.

In addition to project wide monitoring, sub-contractors will manage, monitor and report on their environmental performance in accordance with the requirements of this CEMP.

2.5.5 Environmental Representative

The primary role of the ER is to independently oversee compliance with the Development Consent. Works must not commence until an ER has been approved by the Planning Secretary and engaged by the Applicant. (CoC A33)

2.5.5.1 Appointment of an ER

The Planning Secretary's approval of an ER must be sought no later than one month before the commencement of works, or within another timeframe agreed with the Planning Secretary (CoC A34).

The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the EIS, RtS and any other supporting information submitted as part of applications for either MPW or MPE, and is independent of the construction and design personnel for the project and those involved in delivery of it.

Note: Should the requirements of the conditions of this consent be satisfied, an ER approved for MPE and MPW development may also be considered for approval for the development (CoC A35).

The Applicant may engage more than one ER for the development, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of the development (CoC A36).

2.5.5.2 The Role of the ER

For the duration of the works until 6 months after the commencement of operation (or staged operation), or as agreed with the Planning Secretary, the approved ER must:

- receive and respond to communication from the Planning Secretary in relation to the environmental performance of the development;
- consider and inform the Planning Secretary on matters specified in the terms of this consent;
- consider and recommend to the Applicant any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community;
- review documents required under this consent and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this consent and if so:

  (i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or

  (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary/ Department for information or are not required to be submitted to the Planning Secretary/ Department);

- regularly monitor the implementation of the documents required under this consent to ensure implementation is being carried out in accordance with the document and the terms of this consent;
- as may be requested by the Planning Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings, and site visits, but not Independent Audits required under Condition C18 of this consent;
- as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints; and
- assess the impacts of minor ancillary facilities comprising lunch sheds, office sheds and portable toilet facilities as required by Condition A40 of this consent;
- consider any minor amendments to be made to the CEMP or CEMP sub-plans that require updating, or amendments of an administrative nature, and are consistent with the conditions of this consent and the most recent version of the CEMP or CEMP sub-plan approved by the Planning Secretary, and if satisfied that such an amendment is necessary, approve the minor amendment; and
- prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Department's Environmental Representative Protocol (2018) under the heading "Environmental Representative Monthly Reports." The Environmental Representative Monthly Report must be submitted within seven calendar days following the end of each month for the duration of the ER's engagement for the development, or as otherwise agreed with the Planning Secretary.
- Facilitate and assist the Planning Secretary in any audit of the ER's activities.

2.5.5.3 The Provision of Documentation to the ER

The Applicant must provide all documentation requested by the ER in order for the ER to perform their functions specified in Section 2.5.5.2 (including preparation of the ER monthly report), as well as:

- the complaints register (to be provided on a monthly basis); and
- a copy of any assessment carried out by the Applicant of whether proposed work is consistent with the consent (which must be provided to the ER before the commencement of the subject work in accordance with CoC A37 and A38)

2.6 Communication

Clear lines of communication throughout all levels and functions (e.g. management, staff and subcontracted service providers), as well as to key external stakeholders, is key to minimising environmental impacts and achieving continual improvements in environmental performance.

2.6.1 Internal Communications

The Contractor's Management Team[4] and Principals Representative will meet at least fortnightly to discuss progress and any issues with environmental management or performance on-site, any amendments to plans that might be required or any new / changes to construction activities. Meeting minutes will be taken and maintained by the Construction Contractor.

Any changes to environmental management, personnel and practice on site will be communicated to Project personnel through the following internal communications:

- Management reports
- Site inspection reports
- Incident notification reports
- Noticeboards
- Site meetings

[4] The Contractor's Management Team includes, as a minimum the Contractor's PM, Contractor's CM, Contractor's EM and Site Supervisor.

- Employee induction, training and toolbox sessions
- Briefings, notifications and alerts
- Project reports.

2.6.2 External Communications

A CCS (CoC A31) has been developed to facilitate communication between SIMTA and the key stakeholders, including regulators, Liverpool City Council and the community, during construction of the development. The CEC will act as the 'control tower' for all community communications. All community liaison must be undertaken in accordance with the CCS.

Media inquiries and external communications with DPIE, DAWE and the EPA are the responsibility of the Principal's Representative. Direct requests from the media to any personnel for information about the Project will be referred directly to the Principal's Representative.

External communication will also include regulatory consultation such as:

- ER meetings
- ER Compliance Reports
- Site Environmental Compliance reports
- Liaison and meetings with DPIE and DAWE
- Visitors induction and training.

2.6.2.1 Notification to Planning Department Prior to Development Stages

In accordance with CoC A46 DPIE must be notified of the date of commencement for each of the following phases of the Project at least 2 weeks before commencement of each phase:

- any work
- vegetation clearing required to conduct remediation
- remediation
- low impact works
- construction.

2.6.3 Complaints Management

Public complaints shall be logged with the Principal's Representative and are to be responded to in accordance with the CCS. Public complaints may be received via:

- Project email - simta@elton.com.au
- 24-hour project information line - 1800 986 465
- Postal address - PO Box 1488 Bondi Junction NSW 2022
- Project website - www.simta.com.au
- Face to face interactions with Project personnel.

Environmental management-related complaints will be recorded in a complaints register and forwarded onto the Contractor's EM by the Contractor's CLM and/or the Principal's Representative, in accordance with the CCS.

The complaints register will be forwarded to the ER on a monthly basis in accordance with CoC A38(a). Records of complaints will be maintained in accordance with the CCS.

2.7 Environmental Training and Competence

2.7.1 Training

All Project personnel shall undergo general environmental awareness training and training relevant to their responsibilities under the CEMP. Records of Project environmental induction and other environmental training will be maintained and readily accessible.

2.7.1.1 Project Environmental Induction

All workers and sub-contractors accessing the Project site will receive a site-specific induction that includes details of environmental and compliance obligations. The Contractor's EM is responsible for developing the site-specific induction and maintaining a register of attendance at the project environmental induction including dates, names of people inducted and trainer details.

All employees (including sub-contractors) will receive induction/ training including, but not limited to, the following:

- Environmental Policy
- Requirements of the CEMP and sub-plans
- Individual authorities and responsibilities
- Site environmental rules and requirements
- Emergency procedure and response (e.g. spill clean-up)
- Location of environmentally sensitive areas and exclusion zones
- Communications and reporting incidents
- Environmental competency requirements for works.
- Heritage considerations
- Potential consequences of departure from rules
- Legal obligations
- Waste management
- Conservation of on-site resources including water, materials, and energy
- Requirement to provide more than 2 weeks advanced notice prior to each of the construction phases detailed in Section 2.6.2.1.

Site personnel will be informed of their individual responsibility to be proactive and report any instances of environmental control measures not operating properly.

All visitors to the Project site must undergo a visitor's induction. All visitors must be accompanied by Project personnel at all times.

2.7.1.2 Pre-start and Toolbox Talks

Pre-starts will be held on a daily basis by the Site Supervisor and provide the Project personnel with any updates on environmental matters, including any key or recurring environmental issues. Any personnel undertaking works on site must attend a pre-start. The Pre-starts will include requirements of relevant Work Method Statement (WMS) and Environmental Control Maps (ECMs).

Toolbox talks will be undertaken in response to evolving issues on the ground, particularly in response to environmental incidents, non-conformance or non-compliance issues or any changes to the CEMP and environmental management procedures.

Attendance at toolbox talks is mandatory for site personnel and sub-contractors. Specific environmental issues that may be addressed in toolbox talks include:

- Community awareness
- Working with potentially contaminated soils
- Waste management

- Soil and water management practices
- Unexpected finds (heritage, contamination, flora and fauna)
- Noise minimisation for staff working out of hours
- Incident management, and environmental emergency mock training
- Any other subjects listed in environmental management plans.

2.7.1.3 Recommended Environmental Training

A summary of proposed awareness training by environmental aspect is provided in Table 2-8. The training shall be scheduled to reflect works / activities in the construction program and/or as deemed required by the Contractor's EM from time to time, to address specific occurrences or changes.

The Contractor's EM is responsible for maintaining a register of environmental training carried out, including dates, names of people trained and details of the training and trainer.

Table 2-9 Indicative Awareness Training by Environmental Aspect

Aspect	Training Inclusion	Personnel Required	Timing / Frequency / Means
Emergency spill response	• Use and location of spill kits • Spill control • Emergency response procedures • Spill response drill • Identification of hydraulic hose fatigue.	Construction personnel	Project induction Project toolbox talks Construction Contractor to provide relevant training
Erosion and sediment control	• Types of erosion and sediment controls • Implementation of erosion and sediment controls on site • Development of ESCPs.	Construction personnel	Project induction Project toolbox talks Contractor to provide relevant training
Heritage awareness	• Stop works and reporting protocols for discovery of heritage and archaeological items.	Construction personnel	Project induction Project toolbox talks Protocol posted on message boards
Contamination awareness	• Contamination status of site • Stop works protocols for unexpected contamination (e.g. hydrocarbons and asbestos) • Acid Sulphate Soils	Construction personnel	Project induction Project toolbox talks Protocol distributed to workers and posted on message boards
Environmental legal obligations	• POEO Act and other project requirements • Applicable fines and prosecutions.	Construction personnel	Project induction Project toolbox talks
Waste Management	• Opportunities to minimise waste • Waste disposal requirements and minimisation of litter	Construction personnel	Project induction Project toolbox talks
Community / stakeholder awareness	• Adjacent community and Project involvement • Relevant Project stakeholders	Construction personnel	Project induction Project toolbox talks

Aspect	Training Inclusion	Personnel Required	Timing / Frequency / Means
	• Accepted behaviours • Approved hours of work.		
Biodiversity	• 'No go' areas and exclusion areas • ECMs • Wildlife status of project and surrounds • Stop work and reporting protocols for injured wildlife • Measures to stop feral animals coming to site.	Construction personnel	Project induction Project toolbox talks
Noise and vibration	• Work hours • Management measures to reduce noise and vibration from construction activities • EPL requirements • POEO Act and other project requirements.	Construction personnel	Project induction Project toolbox talks

The Contractor's EM is responsible for identifying additional environmental training requirements in response to changes in the Project environmental management documentation, site conditions or review of the CEMP.

2.7.2 Worker Competency

The Contractor's CM is responsible for identifying the competency needs for the Project and allocating resources for training. Some key competency environmental standards for the Project include:

- Specific hazardous liquid / hazardous waste removal licence
- Vegetation removal and fauna relocation
- Traffic management qualifications
- Asbestos awareness (removal)
- Erosion and sediment control including Volume 1 of Managing Urban Stormwater: Soils and Construction ('Blue Book') (Landcom 2004)
- Air quality, noise and vibration and water quality monitoring
- ICAM.

Records of licences, training and verification of competencies will be documented in a training register and maintained on the Project site.

Evidence of training and competency is to be provided prior to commencement of works by site personnel and contractors, applicable to the tasks to be undertaken.

2.8 Emergency Preparedness and Response

An ERP has been prepared in accordance with CoC B194 and is consistent with the Pollution Incident Response Management Plan (PIRMP), required under the EPL (Licence Number 21054) for the Project. The Construction Contractor must operate in accordance with the ERP and PIRMP. The ERP addresses the planning and preparation for emergency scenarios and detailed emergency procedure for, but not limited to, the following:

- Bushfire
- Flooding

An environmental emergency is any event that causes or has the potential to cause material harm to the environment.

Each Construction Contractor must nominate a Site Emergency Contact and an alternate contact that will be available 24-hours a day, seven days a week. The Site Emergency Contact has the authority to stop and direct works. Emergency contact details are included in Table 2-10.

Table 2-10 Emergency Contact Details

Contact Name	Telephone Number	Address
Ambulance	000	N/A
Fire Brigade	000	N/A
Police	000	N/A
NSW EPA Pollution Hotline	131 555 or (02) 9995 5555 (if calling from outside NSW).	N/A
Ministry of Health	(02) 9391 9000	N/A
SafeWork NSW	13 10 50	N/A
Liverpool City Council	Customer Contact Centre for NSW residents: 1300 36 2170 Calling from interstate: (02) 9821 9222 National Relay Service (NRS) for hearing and speech impaired customers: 133 677	Ground Floor, 33 Moore St, Liverpool NSW 2170
Rural Fire Service	9603 7077	Cnr Alderney St and Townson Ave, Minto 2566
Liverpool Hospital	8738 3000	Corner of Elizabeth and Goulburn Streets, Liverpool, NSW 2170
Principal's Representative	Contact details to be confirmed	Contact details to be confirmed
Contractor's PM	Contact details to be confirmed	Nominated 24-hour contact
Contractor's CM	Contact details to be confirmed	Nominated 24-hour contact
Contractor's EM	Contact details to be confirmed	Back-up 24-hour contact
Contractor's CLM	Contact details to be confirmed	Back-up 24-hour contact
Contractor's Health & Safety Manager	Contact details to be confirmed	Contact details to be confirmed
SIMTA Hotline number	1800 986 465	N/A

2.8.1 Incident Classification and Notification

An environmental incident is defined within the CoC as 'an occurrence or a set of circumstances that causes or threatens to cause material harm'. Environmental incidents include pollution incidents and environmental emergencies and 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 4.4.

A pollution incident is an incident or set of circumstances during or as a consequence of, which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has

been placed or disposed of on premises. It does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).

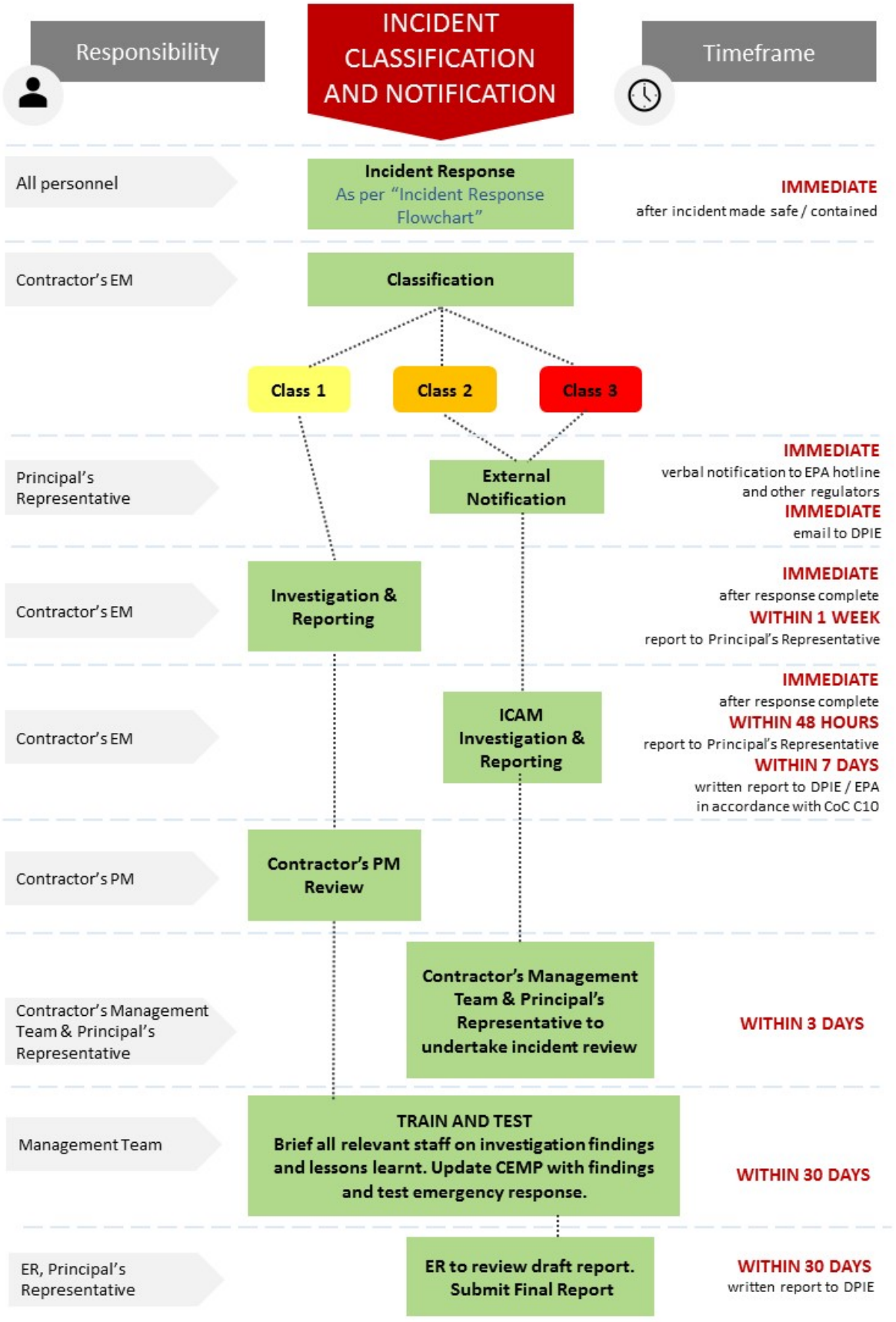


Figure 2-3 Environmental Incident Classification and Notification

Additional clarifications on the environmental incident classification and notification process for the Construction Contractor are as follows:

- Incidents will be classified into one of three classes as per Table 2-11. The Contractor's EM is responsible for the classification of incidents in consultation with the Principal's Representative
- For actual or potential Class 2 and 3 environmental incidents the Contractor's EM will immediately inform the Principal's Representative
- An ICAM certified person must complete a detailed ICAM investigation for actual or potential Class 2 and 3 environmental incidents
- Designated personnel to implement corrective and preventative actions.

Table 2-11 Environmental Incident Classification

	Class One	Class Two (including potential)	Class Three (including potential)
Direct costs including clean up	Up to $10,000	$10,000 to $100,000	More than $100,000
Impact	Potential or actual material harm such as: • Pollution or degradation which has low severity impacts 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. • Discarding a lit cigarette	Material harm such as: • Pollution or degradation which has moderate severity 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 • Discarding a lit cigarette during a total fire ban	Material harm such as: • Pollution or degradation which has high severity 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. • Permitting a fire to escape causing injury or damage to person, land or property of the Crown or a public authority.

2.8.2 Incident Response

All environmental incidents will be managed in accordance with the flowchart shown in Figure 2-4.

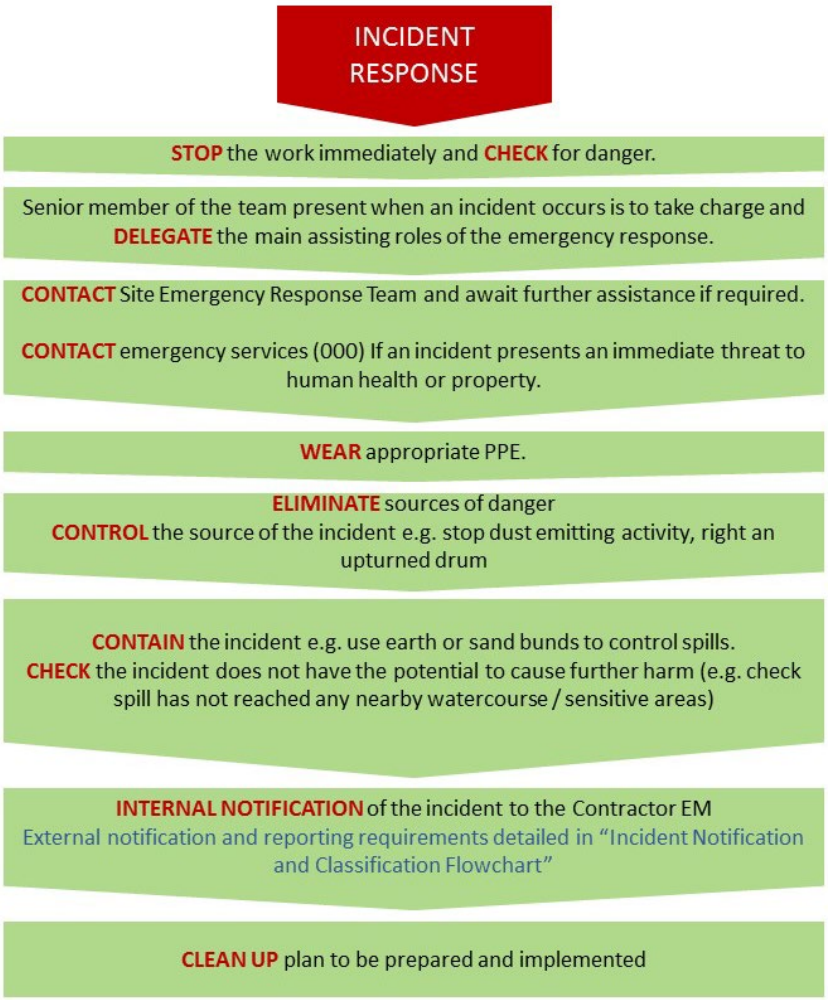


Figure 2-4 Environmental Incident Response Flowchart

2.8.3 External Notification

All environmental incidents are to be reported and managed in accordance with Qube's Incident Reporting and Management procedure (SHEMS-QM-13-PR-0126) and in accordance with the ERP and PIRMP. Environmental incidents will be classified and notified in accordance with Figure 2-3.

2.8.3.1 Environmental Protection Authority

In accordance with the POEO Act, the Principal's Representative Project Management Team will immediately notify the EPA of all actual or potential Class 2 and Class 3 incidents via the EPA Environment Line (131 555).

The notification to the EPA will need 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.

In addition to notifying the EPA of pollution incidents, the Principal's Representative Project Management Team will also immediately notify other relevant regulatory authorities as outlined below:

- The Ministry of Health (via the local Public Health Unit – 02 9391 9000)
- The WorkCover Authority – 13 10 50
- Liverpool City Council – 1300 36 2170
- Campbelltown City Council – 02 4645 4000
- Fire and Rescue NSW – 000.

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.

2.8.3.2 DPIE

DPIE will be notified in writing (compliance@planning.nsw.gov.au) immediately upon the Principal's Representative 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.

Incident notification requirements, in accordance with CoC C10 and Appendix 3 of the Development Consent must:

a. Identify the development and application number;
b. Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
c. Identify how the incident was detected;
d. Identify when the Applicant became aware of the incident;
e. Identify any actual or potential non-compliance with conditions of consent;
f. Describe what immediate steps were taken in relation to the incident;
g. Identify further action(s) that will be taken in relation to the incident; and
h. Identify a project 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. A summary of the incident
b. The outcomes of an incident investigation, including identification of the cause/s of the incident
c. Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
d. Details of any communication with other stakeholders regarding the incident.

All external notification of environmental incidents will be undertaken by the Principal's Representative Project Management Team

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.

2.8.3.3 DAWE

Environmental incidents relating to the EPBC Act must be notified to the Secretary of the DAWE within seven days of the event.

These types of incidents may include, but are not limited to, the death or injury to the following:

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

2.8.4 Incident Review

Actual and potential Class 1 incidents will be reviewed by the Contractor's EM and notified to the Principal's Representative.

Actual or potential Class 2 or 3 incidents will be reviewed by the Contractor's Management Team and the Principal's Representative.

Actual or potential Class 2 or 3 incidents will be reviewed by the Contractor's EM who will immediately notify the Principal's Representative. The Principal's Representative will undertake external notification as required.

Within three days of a potential or actual Class 2 or 3 incident, the Contractor's EM will convene a briefing with the Contractor's Management Team and Principal's Representative to provide an update on the incident investigation.

The following information relating to the incident investigation shall be documented:

- The condition of the environment and the status of any rectification or remediation works
- The completed 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.

The Contractor's EM will provide the Principal's Representative evidence to show the recommendations from the ICAM have been implemented.

3 IMPLEMENTATION

This section addresses the key risks associated with the Project and the environmental controls established to manage them.

3.1 Aspects, Impacts and Risk Management

Project-wide environmental aspects, impacts and opportunities have been identified and assessed in accordance with the risk assessment as presented in the MPW Stage 2 EIS. The key environmental aspects and impacts for the Project, as identified in the MPW Stage 2 EIS, include:

- Construction traffic impacts on local roads surrounding construction worksites
- Noise and vibration impacts on surrounding residents and businesses
- Diminishing air quality through construction vehicle emissions and dust generation
- Loss of biodiversity
- Pollution of adjacent waterways from water discharge and/or spills from worksites
- Adverse flood impacts and increases in stormwater discharge
- Erosion and sedimentation due to ground disturbance, temporary stockpiling and construction of internal roads and structures
- Discovery of unidentified contaminated soils
- Visual impacts of temporary construction worksites on surrounding residences and businesses
- Discovery of unidentified Aboriginal or non-Aboriginal heritage.

3.1.1 Aspects and Impacts Assessment

A risk workshop was undertaken with the Project Management Team and a team of environmental specialists to identify the aspects and impacts, the relevant risk ranking, control measures and residual risk ranking. The resulting Aspects and Impacts Register (Appendix B) has been reviewed, and where appropriate updated, by the ER, Project Management Team and environmental specialists.

The Aspects and Impacts Register identifies the actual or potential environmental impact and provides a reference to relevant management documentation within the CEMP where control measures can be found.

A risk assessment has been conducted on each environmental impact, in accordance with Figure 3-1.

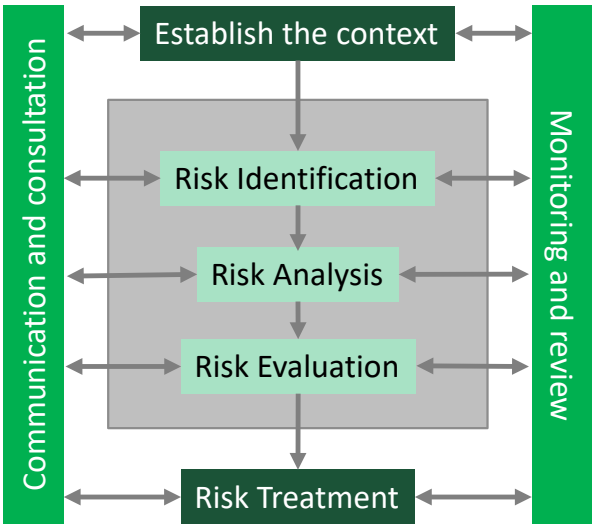


Figure 3-1 Risk Assessment Process

Environmental impacts will be controlled to a degree which is commensurate with the level of risk, with greater emphasis on managing impacts with ‘moderate’ and ‘high’ risks.

The control measures to address these issues are also documented in the Aspects and Impacts Register (Appendix B) and within the aspect specific CEMP sub-plan.

The Aspects and Impacts Register will be updated on an annual basis with the review of the CEMP or where additional aspects, impacts or opportunities are identified during construction of the Project and specific site conditions are encountered and documented.

3.2 Environmental Management Activities and Controls

Environmental management measures to be implemented during construction of the Project to ensure compliance with relevant statutory requirements, limits, performance measures and criteria are documented in the aspect specific CEMP sub-plans. Other measures to manage environmental impacts include ECMs, environmental hold points, WMS and environmental forms.

3.2.1 Environmental Control Maps (ECMs)

The key environmental constraints for the Project are identified in the sub-plans and captured spatially in ECMs (refer to Appendix C). Key environmental constraints include:

- Project boundaries
- Heritage (European and Indigenous)
- Endangered ecological communities, threatened flora and fauna species and habitat vegetation
- Sensitive receivers (e.g. watercourses)
- Weeds
- Location of site offices.

The ECMs must be available in hard copy format in the Construction Contractor's site office. The content of the ECMs must be included in the site induction and covered in pre-starts prior to works adjacent to identified environmental values.

3.2.2 Hold Points

The ability to proceed with works requires process steps, relevant to site environmental values, to be followed. These process steps are included within the CEMP sub-plans and must be complied with and are represented in Table 3-1.

Table 3-1 Summary of Process

Item	Activity	Process	Plan Reference
Traffic	Road works	Approved road occupancy licence	CTAMP – 3.3.1.3 Appendix E – CTAMP
Dewatering	Dewatering / pumping water off the site	Verification that water quality criteria set-out in the CSWMP have been met	CSWMP – 2.1.1 Appendix F - CSWMP
Sediment and erosion control measures	Commencement of ground disturbing activities in the new works area	Progressive Erosion and Sediment Control drawings have been developed, reviewed, and approved	CSWMP – 2.1.1 Appendix F – CSWMP
Site clearing / vegetation removal	Commencement of site clearing or vegetation removal in new works area	Pre-clearing requirements as outlined in the CFFMP have been undertaken and verified.	CFFMP – Appendix B Appendix K – CFFMP
Unexpected finds including threatened	Recommencement of works in the affected area	Refer to aspect specific sub-plan	Appendix K – CFFMP Appendix L – CMP

Item	Activity	Process	Plan Reference
species, heritage item and contamination.			Appendix D – Unexpected Finds Protocol
Dangerous Goods	Transport of Dangerous Goods	Verification that transport vehicles meet the requirements	CTAMP – 2.1.1 Appendix E – CTAMP
Dangerous Goods	Storage of Dangerous Goods[5]	Verification that bunded storage is provided and that offset distances are maintained for the storage area Prior to the commencement of construction the preconstruction studies detailed in CoC B176B are to be undertaken and complied with for the special goods store on the JN Warehouse to which the Preliminary Hazard Assessment applies.	CDWMP – 2.1.1 Appendix O – CDWMP
Controlled / hazardous waste	Transport of controlled/ hazardous waste from the site	Verification that the waste has been classified in accordance with the guidelines, transport licensing in place and landfill can lawfully receive the waste	Appendix O – CWDMP
Spoil transport	Removal of spoil from site	Verification that the spoil has been classified and the disposal location can lawfully receive the waste. Obtain Approved Form Under Section 143 of the POEO Act from location owner if not a NSW EPA licensed facility)	Appendix O – CWDMP
Spoil transport	Import of spoil to site	Waste classification of imported spoil as either ENM, VENM, or other material approved by the EPA prior to spoil entering the site. Visual check and confirmation Supply Approved Form Under Section 143 of the POEO Act from QUBE to spoil owner and transporter	Appendix O – CWDMP Spoil Management Plan (SMP) attached to Appendix F

3.2.3 Work Method Statements

WMSs will be prepared by the Construction Contractor to manage and control activities that have the potential to impact on the community, safety or environment where relevant prior to the commencement of relevant construction activities.

3.2.4 Environmental Forms

Each Construction Contractor is required to prepare their own environmental monitoring or management forms and checklists, relevant to their works. Where forms or checklists have been included within this CEMP or sub-plans, these are indicative and can be replaced with contractor specific-forms. The relevant Construction Contractor must provide environmental and sustainability forms, registers and/or checklists to

[5] The total quantities of dangerous goods present at any time during construction and transport movements to and from the Project will be kept below the screening threshold quantities and movements listed in the Department's Hazardous and Offensive Development Guidelines Applying SEPP 33 (January 2011).

the Principal's Representative for review prior to commencement of works. The Construction Contractor specific forms, registers and/or checklists must include the relevant minimum specific content within.

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
- Pre-clearing checklist
- Energy consumption register
- Water consumption register
- Materials register (including material specifications)
- Clearing permit
- Corrective actions register
- Incident register
- Complaints form.

4 MONITOR AND REVIEW

4.1 Environmental Monitoring

Environmental monitoring will be undertaken to assist in the management of the following:

- Construction of the Project in accordance with environmental approvals
- Compliance with all relevant legislative requirements
- The minimisation of potential environmental incidents
- Effectiveness of environmental controls
- Implementation of this CEMP.

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

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

4.2 Observations and Inspections

4.2.1 Daily Observations

A daily pre-start on plant and equipment will be undertaken and any leaks, fauna relocation or excessive emissions reported to the Contractor's EM.

Site environmental controls will be inspected daily by the Contractor's EM or their delegate. Each work team must inspect the environmental controls as relevant to their work area.

4.2.2 Inspections

Table 4-1 provides a summary of the minimum inspections that will be undertaken for the Project.

Table 4-1 Inspection Summary

Inspection Type	Frequency	Focus	Responsibility	Record
Environment site inspection	Weekly	Relevant social and environmental aspects related to works period	Contractor's EM	Inspection log / report
Rainfall and pre-shutdown inspection	Detailed within CSWMP	Erosion and sediment controls	Contractor's EM	Inspection log / report
ER Inspection	Fortnightly	Compliance with CoC	ER	ER Report
Principal's Representative Inspection	Weekly	Compliance with CoC and Commonwealth Approvals	Principal's Representative	Principal's Representative Report

ER inspections are expected to be undertaken fortnightly. The frequency of inspections will be determined based on the nature of current / upcoming works and the location of works (e.g. proximity to environmentally sensitive areas).

The weekly environment inspections, undertaken by the Principal and the Construction Contractor, will cover the environmental aspects of the Project which are relevant to the stage of works being undertaken. The purpose of these inspections is to:

- Determine compliance with CoC
- Determine conformance with management measures detailed within sub-plans
- Review the performance and effectiveness of environmental controls
- Identify non-conformance to expected performance levels or implementation of controls expected under this CEMP and the respective sub-plans
- Document observations and track performance.

The Construction Contractor will develop and use an environment inspection checklist to document performance and identify potential issues on site. Any corrective actions undertaken are required to be documented, in accordance with the requirements described in Section 4.4.

Weekly inspection checklists will be forwarded to the Principal's Representative through Aconex.

4.3 Environmental Auditing

Auditing will be undertaken in accordance with ISO19011:2014 – *Guidelines for Quality and/or Environmental Management Systems Auditing* by an ISO14001 accredited lead auditor. External independent audits will also be undertaken in accordance with the Independent Audit Post Approval Requirements (Department 2018), and CoC C17 and CoC C18.

The results of the audits will be communicated to the Project site team during the audit close out meeting and an audit report will be issued to management for action and to inform the CEMP review (refer to Section 4.4). A follow up/close out verification inspection and meeting will occur within one month of the issue of the audit report.

Corrective action requests can be issued as part of the audit process as outlined in Section 4.4.

4.3.1 External Audits

External auditing will be undertaken by an independent environmental auditor within 20 weeks of the commencement of construction and annually thereafter in accordance with the Independent Audit Post Approval Requirements.

External audits will focus on determining compliance and conformance with the CEMP, CoC, CoA, FCMM and REMM requirements as a minimum.

The independent auditor will provide a DRAFT of the Independent Audit Report to SIMTA and the Principal's Representative for review before finalisation. The Principal's Representative will submit the response to the independent audit findings to DPIE. The audit report will be publicly available on the Project website within 60 days of submission to DPIE; who will be notified at least seven days before the report is made public.

Within three months of commencing the nominated audit, a copy of the audit report will be submitted to DPIE and any other NSW agency that requests it. In addition, a response to the audit recommendations and proposed timetable to implement the recommendations must be submitted to DPIE.

4.3.2 Internal Audits

The first internal audit of the Construction Contractor will be undertaken by the Principal's Representative within six months of the initial independent audit.

Internal audits will be undertaken annually thereafter on a rolling schedule. The audit scope will be determined by the auditor based on current site activities.

4.4 Non-conformance, Non-compliance and Actions

4.4.1 Non-conformances

Non-conformances are observations or actions that are not in accordance with the CEMP and the aspect specific sub-plan. 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 DPIE as an incident (CoC C10 and CoC C11).

It is the responsibility of all personnel to report non-conformances to their Site Supervisor and / or the Contractor's EM. The Contractor's EM will investigate non-conformances, log corrective actions, and delegate responsibility for corrective actions within assigned timeframes.

Non-conformances with the implementation of the CEMP and sub-plans shall be investigated to determine the root cause and any corrective and/or preventative actions arising. This will be reported to the Principal's Representative in a Non-Conformance/NCR and any corrective and/or preventative actions will be recorded within the Project Corrective Actions Register to be developed by the Construction Contractor and handled in accordance with the Environmental Management System – Corrective and Preventative Action [SHEMS-QM-04-PR-0022].

4.4.2 Non-compliances

A non-compliance as defined in Development Consent SSD 7709 is "*an occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with this consent but is not an incident*". Non-compliances may also arise where an occurrence, set of circumstances or development is considered to be in non-accordance with the EPBC Act Approval (EPBC 2011/6086) CoA, REMM or FCMM. Incident response, classification and notification requirements are outlined in Section 2.8.

Potential non-compliances with the CoC can be identified by anyone and are to be reported to the Contractor's EM as a potential non-compliance. Whether the occurrence, set of circumstances, or development requires to be notified to the DPIE as a non-compliance is the responsibility of the project management team.

Non-compliance with the CoC shall be investigated to determine the root cause and any corrective and/or preventative actions arising. This will be reported to the Principal's Representative in a Non-Conformance/NCR and any corrective and/or preventative actions will be recorded within the Project Corrective Actions Register to be developed by the Construction Contractor and handled in accordance with the Environmental Management System – Corrective and Preventative Action [SHEMS-QM-04-PR-0022]. Non-compliances shall be recorded and addressed through Aconex.

DPIE will be notified in writing to compliance@planning.nsw.gov.au within seven days after the Project becomes aware of any non-compliance (CoC 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 for the non-compliance (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 CoA must be provided to DAWE at the same time as the compliance report is published.

Appendix A1 (Legislation Register) and Appendix A2 (Permits and Licences) provide further detail on notification requirements related to failures to comply with statutory requirements.

4.4.3 Corrective and Preventative Actions Register

Corrective and preventative actions will be logged into a register which will be used to verify the close out of an NCR. Additionally, the register will also be used to identify opportunities for improvement.

The nominated timeframes to resolve corrective actions are detailed in Table 4-2.

Table 4-2 Corrective Actions Timeframe for Resolution

Risk Ranking	Timeframe
1	Action needs to be commenced immediately to resolve the issue
2	Action needs to be resolved within 1 week
3	Action needs to be resolved within 1 month

Trends relating to environmental incidents, non-compliance or non-conformance findings will be reviewed at the Construction Contractor's Management Team meetings to identify any recurring or systemic issues that are indicative of the need to take preventative action.

4.5 Management Review

The Contractor's Management Team and Principal's Representative will annually review the adequacy of the environmental controls and procedures within the CEMP as well as the effectiveness of their implementation to determine whether they are still applicable to the activities being carried out on site.

The management review will be minuted. Changes to the plan will be made by the Principal's Representative and submitted for approval as per Section 1.1.5.

4.6 Environmental Reporting

Reporting requirements for the project include but are not limited to:

- Incident reports
- ER monthly reports
- NCR
- Compliance reports
- Inspection reports
- Internal and external audit reports
- Independent audit report responses.

4.6.1 Compliance Reporting

In accordance with CoC C14, a Construction Compliance Monitoring and Reporting Program (CMRP) will be submitted to the Planning Secretary no later than six weeks prior to the notified commencement of construction. The CMRP will be developed in accordance with the Compliance Reporting Post Approval Requirements (CRPAR, Department 2018). Compliance reports will be developed in accordance with CRPAR by the Principal's Representative who will submit reporting of compliance status to the Planning Secretary, periodically, including but not limited to:

- Pre-Construction Compliance Report submitted to DPIE prior to the commencement of construction
- Construction Compliance Reports at intervals no greater than 26 weeks from the commencement of construction i.e. 6 monthly.

The Principal's Representative will compile and review the compliance issues identified in the Construction Contractor's and ER environment reporting. The compliance issues will be submitted via the compliance report to the Secretary. Each Compliance Report will be publicly available no later than 60 days after submitting it to the Department and the Department and the Certifying Authority will be notified in writing at least seven days before this is done.

APPENDIX A – COMPLIANCE AND OBLIGATIONS REGISTERS

APPENDIX A1: LEGISLATION REGISTER

Legislation Register

Legislation	Objectives & Application	Relevance
Commonwealth Legislation		
Environment Protection and Biodiversity Act 1999 (EPBC)	The objects of this Act are: • To provide for the protection of the environment, especially those aspects of the environment that are matters of national environmental significance, the impacts to land owned by the Commonwealth and the impacts to land by the Commonwealth • To promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources • To promote the conservation of biodiversity • To provide for the protection and conservation of heritage • To promote a co-operative approach to the protection and management of the environment involving governments, the community, land-holders and indigenous peoples • To assist in the co-operative implementation of Australia's international environmental responsibilities • To recognise the role of indigenous people in the conservation and ecologically sustainable use of Australia's biodiversity • To promote the use of indigenous peoples' knowledge of biodiversity with the involvement of, and in co-operation with, the owners of the knowledge.	Commonwealth Approval (No.201/6806) under this Act has been granted in mid-2016 for the MPW Project and includes a number of Conditions of Approval to be addressed as part of the Project. Key sections under this Act that are relevant to the Project 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	The purpose of this Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development and in particular: • To conserve biodiversity at bioregional and State scales • To maintain the diversity and quality of ecosystems and enhance their capacity to adapt to change and provide for the needs of future generations • To improve, share and use knowledge, including local and traditional Aboriginal ecological knowledge, about biodiversity conservation • To support biodiversity conservation in the context of a changing climate	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 2, Division 1: o Section 2.1: Harming or attempting to harm protected animals without authorisation o Section 2.2: Picking protected plants without authorisation

Legislation	Objectives & Application	Relevance
	• To support collating and sharing data, and monitoring and reporting on the status of biodiversity and the effectiveness of conservation actions • To assess the extinction risk of species and ecological communities, and identify key threatening processes, through an independent and rigorous scientific process • To regulate human interactions with wildlife by applying a risk-based approach • To support conservation and threat abatement action to slow the rate of biodiversity loss and conserve threatened species and ecological communities in nature • To support and guide prioritised and strategic investment in biodiversity conservation • To encourage and enable landholders to enter into voluntary agreements over land for the conservation of biodiversity • To establish a framework to avoid, minimise and offset the impacts of proposed development and land use change on biodiversity • To establish a scientific method for assessing the likely impacts on biodiversity values of proposed development and land use change, for calculating measures to offset those impacts and for assessing improvements in biodiversity values • To establish market-based conservation mechanisms through which the biodiversity impacts of development and land use change can be offset at landscape and site scales • To support public consultation and participation in biodiversity conservation and decision-making about biodiversity conservation.	○ Section 2.4: Damaging habitat of threatened species or ecological communities without authorisation • Part 2, Division 2: ○ Sections 2.8 and 2.10: Acts authorised under other legislation (e.g. development consent) or acts authorised by biodiversity conservation licence respectively • Part 7: Biodiversity assessment and approvals under Planning Act • Part 7, Division 4, Section 7.17: Modifications of planning approvals or activities.
Biodiversity Conservation (Savings and Transitional) Regulation 2017	The Regulation sets out the provisions of a savings and / or transitional nature consequent on the enactment of the *Biodiversity Conservation Act 2016*. The Project is defined as a 'pending or interim planning application' and the former planning provisions apply to the Project, to the extent of the biodiversity assessment and approvals under the *EP&A Act*. Modification to the planning approval for the Project is subject to the *Biodiversity Conservation Act 2016*.	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 7: ○ Clause 28: Former planning provisions continue to apply to pending or interim planning applications ○ Clause 30: *Biodiversity Conservation Act* 2016 applies to modification of planning approvals granted before commencement of the *Biodiversity Conservation Act* 2016.

Legislation	Objectives & Application	Relevance

Biosecurity Act 2015	The objects of this Act are to provide a framework for the prevention, elimination and minimisation of biosecurity risks posed by biosecurity matters.
	Other objects of the Act are:
	• To promote biosecurity as a shared responsibility between government, industry and communities,
	• To provide a framework for the timely and effective management of the following:
	  ○ Pests, diseases, contaminants and other biosecurity matter that are economically significant for primary production industries
	  ○ Threats to terrestrial and aquatic environments arising from pests, diseases, contaminants and other biosecurity matter
	  ○ Public health and safety risks arising from contaminants, non-indigenous animals, bees, weeds and other biosecurity matter known to contribute to human health problems
	  ○ Pests, diseases, contaminants and other biosecurity matter that may have an adverse effect on community activities and infrastructure.
		Key sections of this Act that are relevant to the Project include, but are not limited to:
		• 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.
		• Division 5: Outlines the duty to notify biosecurity events
		• 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	This regulation supports the *Biosecurity Act 2015* through: • Establishment of mandatory measures in relation to biosecurity matters • Establishment of biosecurity zones for aquatic pests and diseases • Establishment of biosecurity zones for plant pests and diseases • Establishment of biosecurity zones for weeds • Establishment of notification procedures • Establishment of penalty notices offences and fees payable under the *Biosecurity Act 2015.*	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 2: Sets out mandatory measures that must be implemented in relation to the biosecurity matters identified (i.e. sale or import of plants listed in Schedule 3) • Part 6: Sets out the requirements for notifiable matters (i.e. prohibited matter or events and biosecurity events) • Schedule 3: Lists weeds that must not be imported into or sold in NSW.

Legislation	Objectives & Application	Relevance
Contaminated Land Management Act 1997 (CLM Act)	The objects of this Act are: • Establish a process for investigating (where appropriate) remediating land that the Environment Protection Authority (EPA) considers to be contaminated significantly enough to require regulation under Division 2 of Part 3 • To set out accountabilities for managing contamination if the EPA considers the contamination is significant enough to require regulation under Division 2 of Part 3 • To set out the role of the EPA in the assessment of contamination and the supervision of the investigation and management of contaminated sites • To provide for the accreditation of site auditors of contaminated land to ensure appropriate standards of auditing in the management of contaminated land • To ensure that contaminated land is managed with regard to the principles of ecologically sustainable development.	Contamination on the Project site must be assessed and managed in accordance with this Act. Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 1, Section 5: Defines 'contamination' of land • Part 3, Division 2, Section 11-17: Details regulations of significantly contaminated land • Part 5, Section 60: Outlines the duty to report contamination. Note also SEPP 55 below.
Disability Discrimination Act 1992	The objects of this Act are: • To eliminate, as far as practicable, discrimination against persons on the ground of disability • To ensure, as far as practicable, that persons with disabilities have the same rights to equality before the law as the rest of the community • To promote recognition and acceptance within the community of the principle that persons with disabilities have the same fundamental rights as the rest of the community.	Offices and amenities provided for the Project must comply with this Act.
Environmental Planning and Assessment Act 1979 (EP&A Act)	The objects of this Act are: • To encourage: ○ The proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment ○ The promotion and co-ordination of the orderly and economic use and development of land ○ The protection, provision and co-ordination of communication and utility services ○ The provision of land for public purposes	Planning approval for the Project is regulated by the Department of Planning and Environment (DP&E) under this Act Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 3A, Section 75O, Section 75U, Section 79C: Now repealed but previously related to the approval pathway for the Concept Plan for the SIMTA Project • Part 4, Division 4.7: Relates to the approval pathway for State Significant Developments (SSD). In particular, Section 4.33 provides consent for the Project as SSD

Legislation	Objectives & Application	Relevance
	○ The provision and co-ordination of community services and facilities ○ The protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats ○ Ecologically sustainable development ○ The provision and maintenance of affordable housing, and to promote the sharing of the responsibility for environmental planning between the different levels of government in the State. • To provide increased opportunity for public involvement and participation in environmental planning and assessment.	• Part 4, Division 4.9, Section 4.55: Modification of consents • Part 7, Division 7.1, Subdivision 3, Section 7.12 and 7.16: Payment of monetary levy to Liverpool City Council • Part 9, Division 9.2: Investigative powers of Investigation Officers • Part 9, Division 9.3, Section 9.3 - 9.37 and Schedule 5: Orders that may be given from the Minister or Secretary (i.e. stop work and compliance orders).
Environmental Planning and Assessment Regulation 2000	This Regulation together with the EP&A Act provides the overarching framework for planning in NSW. While the EP&A Act provides the overarching framework for the planning system in NSW, this Regulation supports the day-to-day requirements of this system. The Regulation aims to address the following: • Requirements for preparing Environmental Impact Statements • Building regulation and subdivision certification • Development contributions, including the preparation of contributions plans • Planning certificates which provide information about land • Other miscellaneous matters, including amounts for penalty notices (or fines) that may be issued for breaches of the EP&A Act and the Regulation, provisions for planning bodies (the Planning Assessment Commission and Independent Hearing and Assessment Panels), development by the Crown, and record keeping requirements for councils.	Key sections of this Regulation that are relevant to the Project include, but are not limited to: • Part 4: Development contributions • Part 6: Procedures relating to development applications • Part 7: Procedures relating to complying development certificates • Part 8: Certification of development • Schedule 3: Designated development.
Fisheries Management Act 1994	The objects of this Act are: • To conserve, develop and share the fishery resources of the State for the benefit of present and future generations • To conserve fish stocks and key fish habitats • To conserve threatened species, populations and ecological communities of fish and marine vegetation	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 7A: Conditions for threatened species conservation

Legislation	Objectives & Application	Relevance
	• To promote ecologically sustainable development, including the conservation of biological diversity, and, consistently with those objects: • To promote viable commercial fishing and aquaculture industries • To promote quality recreational fishing opportunities • To appropriately share fisheries resources between the users of those resources • To provide social and economic benefits for the wider community of NSW • To recognise the spiritual, social and customary significance to Aboriginal persons of fisheries resources and to protect, and promote the continuation of, Aboriginal cultural fishing.	
Heritage Act 1977	The objects of this Act are: • To promote an understanding of the State's heritage • To encourage the conservation of the State's heritage • To provide for the identification and registration of items of State heritage significance • To provide for the interim protection of items of State heritage significance • To encourage the adaptive reuse of items of State heritage significance • To constitute the Heritage Council of NSW and confer on it functions relating to the State's heritage • To assist owners with the conservation of items of State heritage significance.	Approval must be gained from the Heritage Council when making changes to a heritage place listed on the State Heritage Register, or when excavating any land in NSW where an archaeological relic might be disturbed. Key sections of this Act that are relevant to the Project include, but are not limited to: Part 6, Division 9, Section 146: Relating to the notification of impacts and heritage finds to the Heritage Council.
Local Government Act 1993	The purposes of this Act are: • To provide the legal framework for the system of local governments for NSW • To set out the responsibilities and powers of councils, councillors and other persons and bodies that constitute the system of local government • To provide for governing bodies of councils that are democratically elected • To facilitate engagement with the local community by councils, councillors and other persons and bodies that constitute the system of local government • To provide for a system of local government that is accountable to the community and that is sustainable, flexible and effective.	Key sections of this Act that are relevant to the Project include, but are not limited to: • Chapter 6, Part 2, Division 2: Outlines the use and management of community land. with requirements to provide: • 100m minimum buffer width from the edge of the gorge or the top of the banks of the Georges River and its tributaries on currently forested Crown lands and natural bushland classified as community land • 40 m minimum buffer widths from wetlands.

Legislation	Objectives & Application	Relevance

National Parks and Wildlife Act 1974	The objects of this Act are:
	• The conservation of nature, including, but not limited to, the conservation of:
	  ○ Habitat, ecosystems and ecosystem processes
	  ○ Biological diversity at the community, species and genetic levels
	  ○ Landforms of significance, including geological features and processes, and Landscapes and natural features of significance including wilderness and wild rivers.
	• The conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including, but not limited to:
	  ○ Places, objects and features of significance to Aboriginal people
	  ○ Places of social value to the people of NSW
	  ○ Places of historic, architectural or scientific significance.
	• Fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation
	• Providing for the management of land reserved under this Act in accordance with the management principles applicable for each type of reservation.
		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 the site.

Protection of the Environment Operations Act 1997 (POEO Act)	The objects of this Act are:
	• To protect, restore and enhance the quality of the environment in NSW, having regard to the need to maintain ecologically sustainable development
	• To provide increased opportunities for public involvement and participation in environment protection
	• To ensure that the community has access to relevant and meaningful information about pollution
	• To reduce risks to human health and prevent the degradation of the environment by the use of mechanisms that promote the following:
	  ○ Pollution prevention and cleaner production
	  ○ The reduction to harmless levels of the discharge of substances likely to cause harm to the environment
	  ○ The elimination of harmful waste
		Key sections of this Act that are relevant to the Project include, but are not limited to:
		• Chapter 3, Part 3.2: Outlines the licenses required for scheduled development work and scheduled activities
		• Chapter 5, Part 5.2:
		  ○ Section 115: Offence to dispose of waste in a manner that harms or is likely to harm the environment
		  ○ Section 116: Offence to cause a spill of a substance in a manner that harms or is likely to harm the environment.
		• Chapter 5, Part 5.3, Section 120: Offense to cause pollution of waters

Legislation	Objectives & Application	Relevance
	○ The reduction in the use of materials and the re-use, recovery or recycling of materials ○ The making of progressive environmental improvements, including the reduction of pollution at source, ○ The monitoring and reporting of environmental quality on a regular basis. • To rationalise, simplify and strengthen the regulatory framework for environment protection • To improve the efficiency of administration of the environment protection legislation • To assist in the achievement of the objectives of the *Waste Avoidance and Resource Recovery Act 2001*.	• Chapter 5, Part 5.4, Division 1: ○ Sections 124 - 126: Require activities to be conducted in a proper and efficient manner relating to air pollution ○ Division 1, Section 128: Requires that all necessary practicable means are used to prevent or minimise air pollution ○ Section 129: Offence to cause or permit the emission of any offensive odour from premises licenses for scheduled activities. • Chapter 5, Part 5.7A: Duty to prepare and implement pollution incident response management plans • Chapter 5, Part 5.7, Section 148: Duty to report pollution incidents causing or threatening material harm • Schedule 1: Defines premises based activities that require an Environmental Protection Licence (EPL) under Section 48. This Act classifies environmental offences and penalties into three tiers: • Tier 1 offences are the most serious which may involve wilful or neglectful disposal of waste. Tier 1 offences result in a maximum of $5,000,000 in fines for a corporation or $1,000,000 in fines or seven years in jail for an individual • Tier 3 can be dealt with penalty notices (i.e. on the spot fines) that can be paid or defended in court.
Protection of the Environment Operations (Clean Air) Regulation 2010	The objects of this Regulation are: • Controls burning generally by imposing an obligation to prevent or minimise emissions, by prohibiting the burning of certain articles and requiring approval for certain fires/incinerators	Key parts of this Regulation that are relevant to the Project include, but are not limited to: • Part 4: Outlines the requirements for motor vehicles and motor vehicle fuels

Legislation	Objectives & Application	Relevance
	• Requires the fitting of anti-pollution devices to certain motor vehicles and prescribes an offence of emitting excessive air impurities • Imposes certain requirements and standards on the supply of petrol • Prescribes standards for certain groups of plant and premises to regulate industry's air impurity emissions • Imposes requirements on the control, storage and transport of volatile organic liquids.	• Part 6: Outlines the control of volatile organic liquids. All construction vehicles and plant will be regulated under the Australian Design Rules (ADRs), which provides the legislative framework for setting national fuel quality standards. All dangerous goods present will be stored in locations and quantities below the risk levels under SEPP 33, and will be compliant with this Regulation.
Protection of the Environment Operations (Waste) Regulation 2014	The objects of this Regulation are: • Provides for the contributions to be paid by the occupiers of scheduled waste facilities for each tonne of waste received at the facility or generated in a particular area • Exempts certain occupiers or types of waste from these contributions • Allows rebates to be claimed in relation to certain types of waste • Provides for certain reporting and record-keeping requirements in relation to scheduled waste facilities and scheduled landfill sites • Exempts certain waste streams from the full waste tracking and recordkeeping requirements • Makes requirements relating to the transport of waste to interstate destinations • Makes special requirements including reporting requirements relating to asbestos waste as well as prohibiting the re-use and recycling of asbestos waste • Imposes requirements on brand owners and retailers to recover, re-use and recycle packaging • Allows the EPA to issue exemptions from certain provisions of the Act and Regulations • Allows the EPA to approve the immobilisation of contaminants in waste • Makes it an offence to apply, or to cause or permit the application of, residue waste to land that is used for the purpose of growing vegetation, subject to any exemptions.	This Regulation outlines the management and disposal of the wastes on the site. Other key parts of this Regulation that are relevant to the Project include, but are not limited to: • Part 7: Transportation and management of asbestos waste • Part 11: Miscellaneous – outlines offence of polluting land at unlicensed landfill site. All wastes generated at the site will be classified in accordance with *NSW EPA Waste Classification Guidelines 2014 and addendums where necessary.* All contamination will be managed in accordance with the Long Term Environmental Management Plan which will be approved by the Site Auditor.

Legislation	Objectives & Application	Relevance
Protection of the Environment Operations (Noise Control) Regulation 2017	The objects of this Regulation are: • Provides for the sale and use of various motor vehicle and motor vehicle accessories devices such as horns and alarms • Regulates noise emitted as a result of the use of marine vessels • Requires labelling of certain other noise emitting articles such as chainsaws, air conditioners, air compressors, pavement breakers, garbage compactors • Provides for the inspection and testing of certain articles.	Relates to procurement and use of noise generating equipment during construction. Relevant sections of this piece of legislation include: • Part 2: Outlines the motor vehicles and motor vehicle accessories • Part 6: Determination of noise levels. All plant used during construction will be monitored in accordance with Part 6 of the Regulation.
Roads Act 1993	The objects of this Act are: • To set out the rights of members of the public to pass along public roads • To set out the rights of persons who own land adjoining a public road to have access to the public road • To establish the procedures for the opening and closing of a public road • To provide for the classification of roads • To provide for the declaration of RMS and other public authorities as roads authorities for both classified and unclassified roads • To confer certain functions (in particular, the function of carrying out road work) on RMS and on other roads authorities • To provide for the distribution of the functions conferred by this Act between RMS and other roads authorities, and • To regulate the carrying out of various activities on public roads. Under Section 138 of the Roads Act, approval is required for works undertaken within a public road reserve. An approval under Section 138 of the Roads Act must be consistent with any conditions of consent under Division 4.1, Part 4 of the EP&A Act (Section 89K(f), EP&A Act).	Key parts of this Act that are relevant to the Project include, but are not limited to: • Part 9, Division 2, Section 138: Approval is required for works undertaken within a public road reserve. As such, an approval under Section 138 for road infrastructure works associated with the Project is required. Moorebank Avenue, to the south of the intersection with Anzac Road, is owned by the Commonwealth of Australia and, as such, the *Roads Act 1993* does not apply.
Rural Fires Act 1997	The objects of this Act are to: • For the prevention, mitigation and suppression of bush and other fires in local government areas (or parts of areas) and other parts of the State constituted as rural fire districts • For the co-ordination of bush firefighting and bush fire prevention throughout the State	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 4, Division 1: ○ Section 63: Duty of public authorities and owners and occupiers of land to prevent bushfires

Legislation	Objectives & Application	Relevance
	• For the protection of persons from injury or death, and property from damage, arising from fires • For the protection of infrastructure and environmental, economic, cultural, agricultural and community assets from damage arising from fires • For the protection of the environment by requiring certain activities to be carried out having regard to the principles of ecologically sustainable development described in Section 6 (2) of the *Protection of the Environment Administration Act 1991.*	○ Section 64: Occupiers to extinguish fires or notify firefighting authorities • Part 4, Division 4: Outlines bushfire danger periods: and the applicability to the performance of hot works in open areas • Part 4, Division 5, Section 89 - 98: Outlines the permit requirements • Part 4, Division 6: Outlines the total fire bans and the applicability to the performance of hot works in open areas • Part 4, Division 7: Outlines the offences for starting fires.
Sydney Water Act 1994	This Act establishes the Sydney Water Corporation whose responsibilities are to provide, construct, operate, manage or maintain systems or services for: • Storing or supplying water, or • Providing sewerage services, or • Providing stormwater drainage systems, or • Disposing of waste water.	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 6, Division 9, Section 73: Grant of compliance certificates prior to commencement of operations.
Waste Avoidance and Resource Recovery Act 2001	The objects of this Act are: • To encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecologically sustainable development • To ensure that resource management options are considered against a hierarchy of the following order: ○ Avoidance of unnecessary resource consumption ○ Resource recovery (including reuse, reprocessing, recycling and energy recovery) ○ Disposal. • To provide for the continual reduction in waste generation • To minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 3, Section 12: Relating to the development of waste strategies.

Legislation	Objectives & Application	Relevance
	• To ensure that industry shares with the community the responsibility for reducing and dealing with waste • To ensure the efficient funding of waste and resource management planning, programs and service delivery • To achieve integrated waste and resource management planning, programs and service delivery on a State-wide basis • To assist in the achievement of the objectives of the POEO Act.	
Water Act 1912	The objects of this Act are: • To govern the issue of water licences within all areas not specified by an approved 'water sharing plan'.	Key sections of this Act that are relevant to the Project include, but are not limited to: • Part 2 and 5, Division 3: Outlines the licenses required to carry out temporary dewatering of groundwater during construction earthworks If during construction earthworks, the temporary dewatering of groundwater (from an excavation) is deemed necessary, then: • Construction Contractor must provide DPI Water with details on the volume of groundwater that is encountered and the duration of pumping.

Water Management Act 2000	The objects of this Act are to provide for the sustainable and integrated management of the water sources of the State for the benefit of both present and future generations and, in particular:
	• To apply the principles of ecologically sustainable development
	• To protect, enhance and restore water sources, their associated ecosystems, ecological processes and biological diversity and their water quality
	• To recognise and foster the significant social and economic benefits to the State that result from the sustainable and efficient use of water, including:
	  ○ Benefits to the environment
	  ○ Benefits to urban communities, agriculture, fisheries, industry and recreation
	  ○ Benefits to culture and heritage
	  ○ Benefits to the Aboriginal people in relation to their spiritual, social, customary and economic use of land and water.
		Key sections of this Act that are relevant to the Project include, but are not limited to:
		• Chapter 2 Part 3:
		  ○ Division 3: Outlines application of division for water use, and lists the core and additional provisions for water use
		  ○ Division 4: Outlines application of division for drainage management, and lists the core and additional provisions for drainage management
		  ○ Division 5: Outlines application of division for floodplain management, and lists the core and additional provisions for floodplain management

Legislation	Objectives & Application	Relevance
	• To recognise the role of the community, as a partner with government, in resolving issues relating to the management of water sources • To provide for the orderly, efficient and equitable sharing of water from water sources • To integrate the management of water sources with the management of other aspects of the environment, including the land, its soil, its native vegetation and its native fauna • To encourage the sharing of responsibility for the sustainable and efficient use of water between the Government and water users • To encourage best practice in the management and use of water.	• Chapter 9, Section 393: Outlines the abolition of common law riparian rights.

Work Health and Safety Act 2011	The objects of this Act are:
	• To provide a balanced and nationally consistent framework to secure the health and safety of workers and workplaces by:
	  ○ Protecting workers and other persons against harm to their health, safety and welfare through the elimination or minimisation of risks arising from work or from specified types of substances or plant
	  ○ Providing for fair and effective workplace representation, consultation, co-operation and issue resolution in relation to work health and safety
	  ○ Promoting the provision of advice, information, education and training in relation to work health and safety
	  ○ Providing a framework for continuous improvement and progressively higher standards of work health and safety.
		Key sections of this Act that are relevant to the Project include, but are not limited to:
		• Part 2: Health and safety duties that apply to persons.

State Environmental Planning Policy No 55—Remediation of Land	The objects of this Policy are:
	• To provide for a Statewide planning approach to the remediation of contaminated land.
	• To promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment:
	  ○ By specifying when consent is required, and when it is not required, for a remediation work
	  ○ By specifying certain considerations that are relevant in rezoning land and in determining development applications in general and development applications for consent to carry out a remediation work in particular
		Key sections of this legislation that are relevant to the Project include, but are not limited to:
		• Section 7: Contamination and remediation to be considered in determining development application.

Legislation	Objectives & Application	Relevance
	○ By requiring that a remediation work meet certain standards and notification requirements.	
Dangerous Goods (Road and Rail Transport) Regulation 2014	The objects of this Regulation are: • To set out the obligations of persons involved in the transport of dangerous goods byland transport • To reduce as far as practicable the risks of personal injury, death, property damage andenvironmental harm arising from the transport of dangerous goods by land transport • To give effect to the standards, requirements and procedures of the ADG Code so faras they apply to the transport of dangerous goods by land transport • To promote consistency between the standards, requirements and procedures applyingto the transport of dangerous goods by land transport and other modes of transport.	Key sections of this Regulation that are relevant to theProject include, but are not limited to: • Clause 67: Duty on prime contractors to transport dangerous goods in accordance with the Australian Dangerous Goods code • Part 5: Consignment procedures for dangerousgoods • Part 12: Outlines the owner's, prime contractor's and driver's duties pertaining to Safety equipment.
Threatened Species Conservation Act 1995 (Repealed)	The objects of this Act were: • To conserve biological diversity and promote ecologically sustainable development • To prevent the extinction and promote the recovery of threatened species, populationsand ecological communities • To protect the critical habitat of those threatened species, populations and ecologicalcommunities that are endangered • To eliminate or manage certain processes that threaten the survival or evolutionarydevelopment of threatened species, populations and ecological communities • To ensure that the impact of any action affecting threatened species, populations andecological communities is properly assessed To encourage the conservation of threatened species, populations and ecological communities by the adoption of measures involving co-operative management.	Biodiversity offsets for the Project site were developed in accordance with the biobanking provisions of the TSCAct, and have been updated to reflect the requirements of the *Biodiversity Conservation Act 2016.* Key sections of this Act that are relevant to the Projectinclude, but are not limited to: • Schedule 1 and 2: Lists species, populations or ecological communities of native flora and fauna considered to be threatened in NSW.
Pesticides Act 1999	The objects of this Act were: • To promote the protection of human health, the environment, property and trade inrelation to the use of pesticides, having regard to the principles of ecologically sustainable development within the meaning of the Protection of the Environment Administration Act 1991 • To minimise risks to human health, the environment, property and trade • To promote collaborative and integrated policies in relation to the use of pesticides	Key sections of this Act that are relevant to the Projectinclude, but are not limited to: • Part 2, Division 3: Outlines general offences relatingto control of pesticides • Part 6: Outlines licenses and restricted pesticide authorisations.

Legislation	Objectives & Application	Relevance
	• To establish a legislative framework to regulate the use of pesticides.	

APPENDIX A2: PERMITS AND LICENCES

Project Permits and Licences Register

Legislation	Part 4 Applicability	Requirement	Commencement Date	Expiry Date	Project Responsibility
General					
Environment Protection and Biodiversity Conservation Act 1999	N/A	Construction Compliance Report to determine regular periodic status of compliance against the Conditions of Consent (CoCs) and the approval to be closed out after completion of construction and operation phases of the Project to which the approval applies.	-	-	Contractor's Environmental Manager (EM) - Construction compliance report to be compiled.
Environmental Planning and Assessment Act 1979	Yes	Planning determination under Part 4, Division 4.7 of this Act ensures the Project complies with the Minister's approval for the Project. Obtain the Minister's approval for any project modifications that are not consistent with the planning approval.	-	This approval will lapse ten years from the date of this approval unless works subject of this approval are physically commenced, on or before that lapse date.	Contractor's EM - The approval requirements will be briefed to all Project personnel prior to and during construction.
Protection of the Environment Operations Act 1997	Yes	Environmental Protection Licences (EPL) may be issued for the following purposes generally: • To authorise the carrying out of scheduled development work at any premises, as required under Section 47 • To authorise the carrying out of scheduled activities at any premises, as required under Section 48 • To authorise the carrying out of scheduled activities not related to premises, as required under Section 49 • To control the carrying out of non-scheduled activities for the purpose of regulating water	4 June 2018	4 June 2023	Contractor's EM and Principal's Representative – The EPL requirements will be briefed to all Project personnel prior to and during construction. Annual return reporting is to be prepared and provided in accordance with EPL commencement date.

Legislation	Part 4 Applicability	Requirement	Commencement Date	Expiry Date	Project Responsibility
		pollution resulting from any such activity, as referred to in Section 122. An EPL (Number 21054) was issued for Moorebank Precinct on 4 June 2018 for the crushing, grinding and separating of > 100000 to 500000 tonne (T) annual processing capacity.			
Water					
Water Act 1912	Yes	In the unexpected event that temporary dewatering of groundwater (from an excavation) is deemed to be required, then a licence to carry out such an activity will be required under Part 5, Division 3, Section 112 of this Act.	To be confirmed if groundwater dewatering required	To be confirmed if groundwater dewatering required	Contractor's EM
Sydney Water Act 1994	Yes	Part 6, Division 9, Section 73 of this Act requires a compliance certificate for water and sewerage infrastructure prior to commencement of operations.	To be confirmed	To be confirmed	Contractor's EM
Biodiversity					
Biosecurity Act 2015 (*Noxious Weeds Act 1993 repealed)*	Yes	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 as referred to in Division 5	If required	N/A	Contractor's EM – Noxious weeds to be controlled as specified under the control category.
Pesticides Act 1999	Yes	Any possession of pesticides on the Project site must be authorised through a permit in accordance with Part 2, Division 3 of this Act. Any application of pesticides in association with the Project site must be undertaken by a person who is licenced to carry out that type of work in accordance with Part 6, Division 1, Section 45 of this Act.	If required	If required	Contractor's EM – Engage suitably qualified pest controller for the Project site as required.

Legislation	Part 4 Applicability	Requirement	Commencement Date	Expiry Date	Project Responsibility
Contamination					
Contaminated Land Management Act 1997	Yes	In accordance with Part 5, 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	Principal's Representative – 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 Chapter 5, Part 5.7, Section 148.	If required	N/A	Principal's Representative – Notification to the EPA will be undertaken, if required.
Hazardous Substances					
Dangerous Goods (Road and Rail) Transport Act 2008	Yes	In accordance with Part 2, 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	To be confirmed	Contractor's EM and sub-contractors – Ensure an appropriate licence is held and is in place where any transportation of dangerous goods is intended.
	Yes	In accordance with Part 2, 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	To be confirmed	Contractor's EM – License requirements will be obtained and briefed to all relevant Project personnel prior to and during construction.
Protection of the Environment		Makes special requirements, including load tracking and reporting requirements, relating to	To be confirmed	To be confirmed	Contractor's EM

Legislation	Part 4 Applicability	Requirement	Commencement Date	Expiry Date	Project Responsibility
Operations (Waste) Regulation 2014		asbestos waste as well as prohibiting the re-use and recycling of asbestos waste.			
Work Health and Safety Regulation 2017	Yes	Asbestos Removal Work Notification will be undertaken by an appropriately qualified sub-contractor where required during the construction phase. Copies of relevant documentation to be obtained upon engagement of sub-contractors and provided to WorkCover	To be confirmed	An asbestos removal licence or asbestos assessor licence lasts for five years unless cancelled earlier (Clause 503 of the WHS Regulation).	Contractor's EM – Ensure engagement of appropriately qualified assessors and removal of asbestos materials in accordance with this Regulation. An Asbestos Removal Work Notification will be undertaken by sub-contractors where required. Clearance certificates will be documented and kept.
Traffic and Transport					
Roads Act 1993	Yes	Section 138 approval will be required from Liverpool City Council and Roads and Maritime for works on the Moorebank Avenue and Anzac Road intersections and north of this intersection, and may also be required during construction for the occupancy of other roads in the vicinity Road occupancy licences under Section 138 of the local Councils and Roads and Maritime Services 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	To be confirmed	Contractor's EM – Ensure all relevant licences and approvals are sought prior to undertaking works within a public road.
Heritage					
Heritage Act 1977	Yes	Notify Office of Environment and Heritage (OEH) (Heritage Division) on discovery of a relic, in accordance with Part 6, Division 9.	If required	N/A	Principal's Representative – Notify OEH (Heritage Division) on discovery of a relic.

Legislation	Part 4 Applicability	Requirement	Commencement Date	Expiry Date	Project Responsibility
Bushfire					
Rural Fires Act 1997	Yes	If hot works are deemed unavoidable, then relevant hot works permits will be obtained by the Construction Contractor under this Act, in accordance with Part 4, Division 5, Section 89 - 98.	To be confirmed	To be confirmed	Contractor's EM - Permit requirements will be obtained and briefed to all relevant Project personnel.
Waste					
The Protection of the Environment Operations (Waste) Regulation 2014	Yes	Comply with record keeping requirements in relation to the transport of certain types of waste.	To be confirmed	To be confirmed	Contractor's EM – Waste transport records will be recorded and kept.
Protection of the Environment Operations Act 1997	Yes	Waste is to be transported to a facility that can lawfully accept the waste, in accordance with Chapter 5, Part 5.7, Section 143.	To be confirmed	To be confirmed	Contractor's EM – Section143 Agreement Notice and proof of waste classification must be provided prior to the acceptance of material on the Project site.

APPENDIX A3: STANDARDS AND GUIDELINES

Compliance with relevant legislation and industry best practice is often achieved through the adherence to relevant guidelines and standards. Guidelines and standards used during the compilation of this CEMP and aspect specific CEMP sub-plans include but are not limited to those detailed below. The most recent version of the applicable Australian Standard (AS) was used in the preparation of this CEMP and aspect specific CEMP sub-plans.

Standards

- AS1158 - Street Lighting Applications
  - AS1158.3 Pedestrian Area (Category P) Lighting
- AS1940 - The Storage and Handling of Flammable and Combustible Liquids
- AS2601 - The Demolition of Structures
- AS2890 – Parking Facilities
  - AS2890.1 - Parking facility off-street parking
  - AS 2890.2 - Parking facilities – Off-street commercial vehicle facilities
  - AS 2890.6 - Off-street parking for people with disabilities
- AS3745 Planning for Emergencies in Facilities
- AS3580.9.3 - Methods for sampling and analysis of ambient air Method 9.3: Determination of suspended particulate matter - Total suspended particulate matter (TSP) - High volume sampler gravimetric method
- AS3580.10.1 - Methods for sampling and analysis of ambient air – Determination of particulates – Deposited matter – Gravimetric Method
- AS4282 - Control of the Obtrusive Effects of Outdoor Lighting
- AS4970 - Protection of Trees on Development Sites
- AS/ISO 10002 - Customer Satisfaction – Guidelines for Complaints handling in Organisations
- AS/NZS ISO 14001 - Environmental Management Systems
- AS/NZS ISO 19011 - Guidelines for Auditing Management Systems
- AS/NZS ISO 31000 - Risk Management.

Guidelines

- Assessing Vibration: A Technical Guide (DECC 2006)
- Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2000)
- Australian Dangerous Goods Code Edition 7.4
- Australian Rainfall and Runoff – Volume 1 (2001), Engineers Australia
- Code of Practice – How to Manage and Control Asbestos in the Workplace (REMM 6D 2016)
- Community Consultative Committee Guidelines: State Significant Projects (2019)
- Compliance Reporting Post Approval Requirements (Department 2018)
- Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (OEH, 2011);
- DECC June 2007 – Local Government Air Quality Toolkit, Visual Guide: Dust from urban construction sites (DECC 2007)
- DIN 4150-3: Structural Vibration – Effects of Vibration on Structures (for structural damage)
- Environmental Guidelines: Solid Waste Landfills, NSW EPA 1996
- Environmental Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA 1997)
- EPA's Smoky Vehicles Program under the NSW Protection of the Environment and Operations Act 1997 and NSW Protection of the Environment and Operations Regulations 2010.
- Guide to Road Design (Austroads)
- Guideline for the Preparation of Environmental Management Plans (DIPNR 2004)
- Guidelines for Controlled Activities (NSW Office of Water)

- Independent Audit Post Approval Requirements (Department 2018)
- Interim Construction Noise Guideline (DECC 2009)
- Managing Urban Stormwater – Soils and Construction Volume 1, 4th Edition (Landcom 2004)
- National Environment Protection Council 2016 – Ambient Air: National Environment Protection Measurefor Ambient Air Quality
- National Environment Protection Measure (NEPM) (Diesel Vehicle Emissions)
- NEPM Guidelines for the Assessment of Site Contamination and Amendments
- Noise wall design guideline – Design guideline to improve the appearance of noise walls in NSW (RMS,March 2016)
- NSW Biodiversity Offsets Policy for Major Projects (OEH 2014)
- NSW Department of Primary Industries (DPI) Policy and Guidelines for Fish Habitat Conservation andHabitat Management (2013)
- NSW EPA 2006 Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales(2006)
- NSW EPA Best Practice Note: Land farming (2014)
- NSW EPA Contaminated Sites, Sampling Design Guidelines (1995)
- NSW Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme 2017
- NSW Planning Hazardous and Offensive Development Guidelines Applying State Environmental Planning Policy No. 33 (January 2011)
- PFAS National Environmental Management Plan (2018)
- Principal's Project Requirements IMEX Terminal No. 1 (IMEX No. 1)
- Safe Work Australia, Code of Practice: How to Safely Remove Asbestos (Safe Work Australia 2016)
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
- State Environmental Planning Policy No. 44 – Koala Habitat Protection
- State Environmental Planning Policy No. 55 – Remediation of Land
- State Environmental Planning Policy (Exempt and Complying Development Codes)
- State Environmental Planning Policy (State and Regional Development)
- Storing and Handling Liquids: Environmental Protection – Participants Handbook (EPA)
- Waste Classification Guidelines Part 1: Classifying waste (NSW EPA 2014) and Addendum to Part 1(2016)
- Water Sensitive Urban Design Guideline 2017 (Roads and Maritime Services).

APPENDIX A4: CEMP RELATED SECONDARY CONDITIONS

It is noted that the other secondary conditions related to aspect specific sub-plans are detailed within those sub-plans.

EPBC 2011/6086 Secondary Conditions

CoA	Requirement	CEMP Section
Secondary Conditions		
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 40 from Table 7.1 of the finalised EIS that are described as 'mandatory' c) explain how all measures 4A to 40 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.	CTAMP – 2.1.1 Appendix E - CTAMP
6	Section of the CEMP and OEMP relating to noise and vibration must be prepared by a suitably qualified expect 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 b) incorporate all measures 5A and 5T (CEMP only) and 5U and 5AJ (OEMP only) from Table 7.1 of the finalized EIS that are described as 'mandatory' c) explain how all measures 5A and 5T (CEMP only) and 5U and 5AJ (OEMP only) from Table 7.1 of the finalized EIS are described as 'subject to review' have been addressed d) be approved by the Minister or a relevant New South Wales regulator.	CNVMP – 2.1.2 Appendix I - CNVMP
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 0 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.	CFFMP - 2.1.1 Appendix J - CFFMP
8	Sections of the CEMP and OEMP relating to contamination and soils must beprepared 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 0 to the finalised EIS b) incorporate all measures 7A to 7K, and BA to BAA, from Table 7.1 of the finalisedEIS that are described as 'mandatory' c) explain how all measures 7A to 7K, and BA to BAA, from Table 7.1 of the finalisedEIS 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) Measure1999 (as amended 2013)	Appendix L– CMP

CoA	Requirement	CEMP Section
Secondary Conditions		
	• 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 posedby 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 toreduce 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 byany contamination iv) include requirements for site validation reports appropriate to the risk posed byany contamination v) include requirements for remedial action plans appropriate to the risk posed byany 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 • contaminated waste material, including excavated soil, to be released throughdewatering to be handled appropriately to the risk posed by the contamination and disposed of in an environmentally sound manner such that potential for thePFAS content to enter the environment is minimised • 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 inan 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, Storm water and Flooding Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 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.	CSWMP – 2.1.1 Appendix F – CSWMP

CoA	Requirement	CEMP Section
Secondary Conditions		
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 0 to the finalised EIS b) incorporate all measures 10A to 10U (CEMP only) and 10 OV to 10AH and 11 A to 11 H (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 11 H (OEMP only) 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.	CAQMP – 2.1.1 Appendix H – CAQMP
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 0 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	CHMP – 2.1.1 Appendix J – CHMP
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 0 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.	CHMP – 2.1.1 Appendix J – CHMP
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.	Appendix P– Light Spill Management CFFMP – 2.1.1 Appendix J – CFFMP
16	Within ten (10) days after the commencement of construction, the person taking the action must advise the Department in writing of the actual date of commencement.	Section 1.2.4
17	The person taking the action must provide the Department with copies of all management plans or strategies required by this approval within one (1) month of their approval.	Section 1.2.4

Secondary Revised Environmental Management Measures (REMM)

No.	Requirement	How Addressed	Comparable CoC
Secondary Condition			
5D	Construction works outside of the standard construction hours identified in condition 5C may be undertaken in the following circumstances: a) construction works that generate noise that is: i) no more than 5 dB(A) above rating background level at any residence in accordance with the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009); and ii) no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009) at other sensitive receivers; or b) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or c) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; d) works approved through an EPL, or e) works as approved through the out-of-hours work protocol outlined in the CEMP.	CNVMP – Section 2.1.2 Appendix I - CNVMP	CoC B126

Secondary Conditions of Consent (SSD 7709)

CoC No.	Condition	CEMP Section	How Addressed
Secondary Conditions			
A1	In addition to meeting the specific performance measures and criteria established under this consent all reasonable measures must be implemented to prevent, and if prevention is not reasonable, minimise, any harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Section 3 Section 4	Section 3 of this CEMP identifies the management measures to be implemented to prevent and minimise environmental harm. Aspect-specific management measures are also identified in each sub-plan required under this CEMP. Section 4 sets out the processes for monitoring and reviewing the effectiveness of these management measures. Opportunities to further minimise environmental harm will be identified through the ongoing evaluation of environmental management performance and effectiveness of this plan.
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	Section 2.7	All personnel must attend the Project induction which outlines the requirements of the Development Consent and environmental management on site

CoC No.	Condition	CEMP Section	How Addressed
	consent relevant to activities they carry out in respect of the development.		
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 plan	This CEMP and associated sub-plans have been developed to comply with the CoC, written directions of the Secretary, amended development layout and management and mitigation measures outlined in Appendix B of the CoC.
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).	Section 1.1.5	Section 1.1.5 details when revisions of the CEMP may be undertaken including upon written direction by the Planning Secretary
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 G), prepared by Bell Architecture and dated 16 October 2020).	Figure 1-2	Figure 1-2 demonstrates the proposed Project layout in accordance with drawing No JR-SK-A-0-9402, Revision G
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.	Section 1.1.2	This CEMP and associated sub-plans have been developed in consultation with the identified parties. Evidence and details of consultation is included within the associated sub-plans.
A33	Works must not commence until an Environmental Representative (ER) has been approved by the Planning Secretary and engaged by the Applicant	Section 2.5.5.1	An ER has been appointed for the project and approved by the Planning Secretary.
A34	The Planning Secretary's approval of an ER must be sought no later than one month before the commencement of works, or within another timeframe agreed with the Planning Secretary	Section 2.5.5.1	
A35	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the EIS, Response to Submissions and any other supporting information submitted as part of applications for either MPW or MPE,	Section 2.5.5.1	The appointed ER is suitably qualified and has not been involved in the MPW Stage 2 planning assessments.

CoC No.	Condition	CEMP Section	How Addressed
	and is independent of the construction and design personnel for the project and those involved in delivery of it Should the requirements of the conditions of this consent be satisfied, an ER approved for MPE and MPW development may also be considered for approval for the development		
A36	The Applicant may engage more than one ER for the development, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of the development	Section 2.5.5.1	The option for engaging more than one ER is detailed in Section 2.5.5.1, however, at present only one ER has been appointed.
A37	For the duration of the works until 6 months after the commencement of operation (or staged operation), or as agreed with the Planning Secretary, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the development; (b) consider and inform the Planning Secretary on matters specified in the terms of this consent; (c) consider and recommend to the Applicant any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents required under this consent and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this consent and if so: (i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary/ Department for information or are not required to be submitted to the Planning Secretary/ Department); (e) regularly monitor the implementation of the documents required under this consent to ensure implementation is being carried out in accordance with the document and the terms of this consent; (f) as may be requested by the Planning Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings, and site visits, but not Independent Audits required under Condition C18 of this consent; (g) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints; and (h) assess the impacts of minor ancillary facilities comprising lunch sheds, office sheds and portable	Section 2.5.5.2	The role, responsibilities and authority of the ER is detailed in Section 2.5.5.2.

CoC No.	Condition	CEMP Section	How Addressed
	toilet facilities as required by Condition A40 of this consent; (i) consider any minor amendments to be made to the CEMP or CEMP sub-plans that require updating, or amendments of an administrative nature, and are consistent with the conditions of this consent and the most recent version of the CEMP or CEMP sub-plan approved by the Planning Secretary, and if satisfied that such an amendment is necessary, approve the minor amendment; and (j) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Department's Environmental Representative Protocol (2018) under the heading "Environmental Representative Monthly Reports." The Environmental Representative Monthly Report must be submitted within seven calendar days following the end of each month for the duration of the ER's engagement for the development, or as otherwise agreed with the Planning Secretary		
A38	The Applicant must provide all documentation requested by the ER in order for the ER to perform their functions specified in Condition A37 (including preparation of the ER monthly report), as well as: (a) the complaints register (to be provided on a monthly basis); and (b) a copy of any assessment carried out by the Applicant of whether proposed work is consistent with the consent (which must be provided to the ER before the commencement of the subject work)	Section 2.5.5.3	Requirements of CoC A38 included at Section 2.5.5.3
A39	The Planning Secretary may at any time commission an audit of an ER's exercise of its functions under Condition C20. The Applicant must: (a) facilitate and assist the Planning Secretary in any such audit; and (b) make it a term of their engagement of an ER that the ER facilitate and assist the Planning Secretary in any such audit	Section 2.5.5.2 Section 4.3	Section 2.5.5.2 specifies the ER's responsibility to assist with audits. Section 4.3 details the project's auditing requirements.
A40	Minor ancillary facilities, including lunch sheds, office sheds, portable toilet facilities, and the like, can be established where they satisfy the following criteria: (a) are located within the construction boundary; and (b) have been assessed by the ER to have: (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts,	Section 1.2.3	This section describes the criteria by which a minor ancillary facility must be assessed prior to its installation

CoC No.	Condition	CEMP Section	How Addressed
	and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.		
A41	Unless stated otherwise, the Applicant must submit strategies, plans and programs required under this consent to the Planning Secretary at least one month prior to commencement of construction or operation.	Section 1.1.6	Submission requirements for the CEMP are outlined in Section 1.1.6
A43	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Section 1.1.5	This section describes the revision requirements of the CEMP and sub-plans
A46	The date of commencement of each of the following phases of the development must be notified to the Department in writing, at least 2 weeks before that date: (a) any work; (b) vegetation clearing required to conduct remediation; (c) remediation; (d) low impact works; (e) construction; (f) operation; (g) cessation of operations; and (h) decommissioning	Section 2.6.2.1	This section species the requirements of this condition as they relate to development phases up to and including construction.
A54	Prior to the commencement of any works, and for the life of the development, the Applicant must ensure that there is a suitable meteorological station operating on the site or within the vicinity of the site that: (a) complies with the requirements in the latest version of EPA's Approved Methods for Sampling of Air Pollutants in New South Wales (DEC, 2016) (as may be updated or replaced from time to time); and (b) is capable of continuous real-time measurement of atmospheric stability category determined by the sigma theta method in accordance with the NSW Noise Policy for Industry (NPI, EPA, 2017) (as may be updated or replaced from time to time).	Appendix H	The requirements of this condition will be addressed in the CAQMP included within Appendix H.
B175	The CEMP required under Condition C2 must include an Unexpected Finds Protocol(s) for, but not limited to, contamination, ordnances, Aboriginal sites, non-indigenous heritage and flora and fauna.	Appendix D	An Unexpected Finds Protocol is included within Appendix D
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	Section 3.2.2	Section 3.2.2 commits to maintaining storage and movements of dangerous goods during construction to below the screening thresholds.

CoC No.	Condition	CEMP Section	How Addressed
	and Offensive Development Guidelines Applying SEPP 33 (January 2011), with the exception of dangerous goods storage for Warehouses JR and JN.		
B176B	Prior to the commencement of construction, the pre-construction studies set out below must be completed: (a) a Fire Safety Study for Warehouse JR and/or Warehouse JN, covering the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The study must be prepared in consultation with Fire and Rescue NSW. (b) a Final Hazards Analysis for Warehouse JR and/or Warehouse JN, consistent with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'. Construction of Warehouse JR or Warehouse JN, other than of preliminary works that are outside the scope of the hazards studies, must not commence until the relevant study recommendations for the subject warehouse have been considered and, where appropriate, acted upon. The studies must be submitted to the Planning Secretary no later than one month prior to the commencement of construction of relevant warehouse to which they apply (other than preliminary works), or within such further period as the Planning Secretary may agree.	Section 3.2.2	Section 3.2.2 provides a commitment to undertake these studies for the special goods store on the JN Warehouse to which the Preliminary Hazard Assessment applies.
B176E	The Applicant must comply with all reasonable requirements of the Planning Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions B176B to B176D, within such time as the Planning Secretary may agree.	Section 3.2.2	Section 3.2.2 provides a commitment to comply with the findings of these studies and reasonable requirements of the Planning Secretary
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	Appendix O	This appendix addresses the management and removal of waste during construction of the Project.
B181	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials	Appendix O	This appendix addresses the management and removal of waste during construction of the Project.
B184	The concrete batching plants must comply with the following criteria: (a) have a total production capacity less than 150 tonnes per day or 30,000 tonnes per year; (b) only one concrete batching plant is to operate at any one time; and	Appendix P	Concrete Batching Plant Management Plan (Appendix P) will be prepared to address the requirements of this condition prior to the establishment of the Concrete Batching Plant

CoC No.	Condition	CEMP Section	How Addressed
	(c) the first concrete batching plant must be disassembled immediately following commencement of operation of the second concrete batching plant		
B185	The CEMP required under Condition C2 must include: (a) a drawing showing the location and layout of the two concrete batching plants including facilities for cementitious water treatment and connections to construction site water management and erosion and sediment control structures; (b) mitigation, monitoring and management procedures specific to the concrete batching plants that would be implemented to minimise environmental and amenity impacts during both facility establishment and operation; and (c) timeframes for establishment of each of the batching plants	Appendix P	Concrete Batching Plant Management Plan (Appendix P) will be prepared to address the requirements of this condition prior to the establishment of the Concrete Batching Plant
B186	The CEMP required under Condition C2 must include mitigation, monitoring and management procedures specific to the crushing plant that would be implemented to minimise environmental and amenity impacts	Section 2.4.2.1 Individual aspect-specific sub-plans Appendix P	The crushing plant will be operated in accordance with the EPL (Licence Number 21054). In addition, the crushing plant will be operated in accordance with this CEMP and all relevant aspect specific sub-plans (including Appendix P where relevant) to minimise environmental and amenity impacts.
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 2.8.3	This section provides detail of the external notification requirements of incidents
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 4.4.2	This section provides detail of the external notification requirements of non-compliances
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 be, undertaken to address the non-compliance.	Section 4.4.2	This section provides detail of the external notification requirements of non-compliances
C13	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Section 4.4.2	This section provides detail of the external notification requirements of non-compliances
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	Section 4.3	This section details the Project's auditing requirements

CoC No.	Condition	CEMP Section	How Addressed
	Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.		
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).	Section 4.3	This section details the Project's auditing requirements
C18	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: (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 is done.	Section 4.3	This section details the Project's auditing requirements

Revised Compilation of Mitigation Measures

No relevant secondary conditions identified.

APPENDIX B – ASPECTS AND IMPACTS REGISTER

Construction Activity	Category	Environmental Aspect	Environmental Impact	Consequence	Likelihood	Consequenc	Rating	Control Measures (*Opportunities shown in green*)	Likelihood	Consequenc	Rating	Responsibility
General	General	- Approvals and licensing	- Not identifying appropriate approvals / licencesrequired or proceeding without them	- Works delayed - Infringements - Poor client relations - Reputational loss	B	5	Very High	- Check Environmental Assessment / Conditions of Consent / EIS and statutory documentation (Revised Compilation of Mitigation Measures (RCMM), Revised Statement of Commitments (RSoC),Commonwealth Mitigation Measures (CMM), Conditions of Consent (CoC), EPL Conditions) - Document requirements in CEMP and associated sub-plans - Establish and maintain a register of approvals, licenses and permits - Implement a Compliance Tracking Program to track compliance	C	3	Moderate	Contractor's PMSIMTA Contractor's EM
	Visual	- Use of vehicles, plant and equipment - General construction activities	- Changes to visual landscape	- Impacts to community - Visual amenity	B	2	Moderate	- Elements within construction sites will be located to minimise visual impacts, (e.g. setting back largeequipment from site boundaries, use of hoardings, progressive re-vegetation) - Regular maintenance will be undertaken of site hoardings and perimeter areas including the promptremoval of graffiti - Re-vegetation / landscaping would be undertaken progressively - Design of site hoardings would consider the use of artwork or project information	D	2	Low	Contractor's EM Contractor's CLM Contractor's PM
	Contamination	- Unexpected finds (including asbestos,UXO, EO and EOW)	- Pollution of surface water, groundwater and landthough spread of existing contamination - Safety hazards associated with Chemicalcontaminants, UXO, EO and EOW	- Water quality degradation - Fauna mortality - Loss of amenity (e.g. fishing) - Safety risk to construction staff and community	B	5	Very High	- Implement management measures in the Contamination Management Plan - Identify any contamination hotspots and incorporate procedures for these locations into constructiondocumentation - Implement an Unexpected Finds Protocol	C	4	High	Contractor's EM
		- Use of vehicles, plant and equipment	- Pollution of surface water, groundwater and landthrough leaks and spills	- Water quality degradation - Fauna mortality - Loss of amenity (e.g. fishing) - Contamination of land	C	2	Low	- Implement the management measures in the Emergency Preparedness and Response ManagementPlan (or equivalent) - Emergency spill kits to be made available and maintained on site - Avoid refuelling or maintenance activities in close proximity to the Georges River - Spill response training sessions for relevant staff	E	4	Low	Contractor's EM
	Traffic	- Use of heavy and light vehicles	- Use of unauthorised access routes	- Disturbance to local road users and residents resulting incomplaints - Safety risk to road users - Potential for delays at local road access points	C	4	High	- Implement management measures in the Construction Traffic and Access Management Plan - Implement community notification procedures	D	3	Low	Contractor's CM Contractor's CLM
		- Moorebank Avenue Works	- Road closures delays and diversions	- Disturbance to road users resulting in communitycomplaints - Safety risk to road users	B	3	High	- Implement management measures in the Construction Traffic and Access Management Plan - Conduct Road Safety Audit - Implement community notification procedures - Implement a Fill Importation Management Protocol	C	3	Moderate	Contractor's PM Contractor's EM
	Noise and Vibration	- Use of vehicles, plant and equipmentfrom general construction activities	- Production of noise and vibration	- Disruption to community and surrounding fauna - Potential damage to adjacent commerical and residentialstructures - Potential damage to heritage structures - Potential for complaints	B	3	High	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on their upcomingactivities that may be impacted by construction vibration - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations.	C	2	Low	Contractor's EM Contractor's CLM
	ERSED	- Movement of vehicles, plant andequipment - General construction activities	- Transport of soils and sediments	- Soil loss - Increased sedimentation and turbidity - Damage to offsite flora and fauna habitat - Degradation of local watercourses - Fines for sedimante escaping the site	B	4	Very High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Locate stockpiles away from waterways, watercourses and drains - Induction / toolbox training on the need to prevent pollution - Reuse excavated material on site where possible	D	3	Low	Contractor's EM
	Air Quality	- Use of vehicles, plant and equipment	- Production of atmospheric pollutants	- Air quality degradation from vehicle exhaust - Impacts to community - Impacts to flora and fauna	C	3	Moderate	- Implement management measures in the Construction Air Quality Management Plan - Activities to be undertaken in accordance with EPL - Erosion and Sediment Control Plans approved before works commence - Ensure only well maintained plant / equipment are used on the site - Use of recycled water for dust suppression	D	3	Low	Contractor's EM Contractor's CLMSite Supervisor
	Resource use	- Use of vehicles, plant and equipment	- Depletion of natural resources - Greenhouse gas emissions	- Depletion of resources - Contribution to climate change	B	2	Moderat	- Inductions and toolbox training on waste management and energy saving practices in constructionplant and equipment and during office work - No idling of plant equipment where possible onsite - Equipment / plant equipment inspections must be undertaken prior to use on site - Consideration will be given to material substitution where reasonable and feasible to reduce embodiedenergy of construction materials - Procurement of materials and consumables considering environmental impacts in their manufactureand disposal (e.g. silica fume for use within concrete, recycled paper, etc.) - Where possible locally sourced materials will be used to reduce GHG emissions associated withtransport during construction - Reduce carbon emissions and costs through under clearing - Engage local workforce / suppliers	C	2	Low	Contractor's EMSite Supervisor All Project personnel

Construction Activity	Category	Environmental Aspect	Environmental Impact	Consequence	Likelihood	Consequenc	Rating	Control Measures (*Opportunities shown in green*)	Likelihood	Consequenc	Rating	Responsibility
	Bushfire	- All works requiring a hot works permit	- Idling engines - Sparks from activities - Cigarette butts causing bushfire - Increases in temperature due to climate change	- Property damage - Destruction of flora and fauna	D	5	Moderate	- Implement management measures in the Construction Bushfire Management Plan - Conduct hot works permit - Consult with the RFS regarding bushfire risk	E	5	Moderate	Contractor's EM
	Waste	- Waste disposal during construction	- Generation of construction waste	- Depletion of natural resources and deposition of largeamounts of waste to landfill - Incorrect disposal of waste	C	2	Moderate	- Implement management measures in the Construction Demolition and Waste Management Plan - Waste management will be guided by the NSW EPA waste management hierarchy - Use local waste facilities - Identify opportunities to incorporate recovered materials into the permanent works	E	2	Low	Contractor's EM Site Supervisor Sub-contractors
	Biodiversity	- Use of heavy and light vehicles andequipment	- Risk of collision with fauna - Creation of hazards for fauna	- Mortality to flora and fauna	D	3	Low	- Implement management measures in the Construction Flora and Fauna Management Plan - Implement two-stage clearing approach - Induction / tool box training on clearance zones and required protection measures - For animal injuries, contact the local wildlife rescue agency and/or veterinary surgery	E	3	Low	Contractor's EM Site Supervisor Sub-contractors
		- Working in close proximity to endangered ecological communities	- Risk of clearing outside the Project footprint - Transport of soils / sediment	- Impacts and/or destruction of offsite flora and fauna - Soil loss - Increased sedimentation and turbidity	B	4	Very High	- Implement management measures in the Construction Flora and Fauna Management Plan - Induction / tool box training on clearance zones and required protection measures - Demarcate (e.g. flagging) no-go zones.	E	4	Low	Contractor's EM Site Supervisor Sub-contractors
Vegetation Clearing	Biodiversity	- Clearing of site vegetation	- Removal of vegetation	- Habitat loss - Fragmentation - Potential for injury / death of flora and fauna - Wrong vegetation removed	C	2	Low	- Implement management measures in the Construction Flora and Fauna Management Plan - Induction / tool box training on clearance zones and required protection measures - Where applicable, mature tree and other native vegetation to be retained would be clearly delineatedwith all construction activities excluded from these areas - Remove existing weeds species and prevent migration of species	E	4	Low	Contractor's EMSite Supervisor
	Waste	- Clearing of site vegetation	- Generation of vegetative waste	- Fire hazard - Odour impacts to community	B	2	Moderate	- Implement management measures in the Construction and Demolition Waste Management Plan - Avoidance of waste generated and reused where reasonable and feasible - Stockpiling of waste away from watercourses - Regularly turning vegetative waste	E	3	Low	Contractor's EMSite Supervisor All Project personnel
	ERSED	- Clearing of site vegetation	- Exposure of soils	- Increased sediment transport, sedimentation andturbidity - Soil loss - Increased runoff - Degradation of local watercourses	B	4	Very High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Locate stockpiles away from waterways, watercourses and drains - Induction / toolbox training on the need to prevent pollution - Reuse excavated material on site where possible	D	3	Low	Contractor's EM
	Air Quality	- Clearing of site vegetation - Vegetation stockpiling	- Production of particulates (i.e. dust or particulatematter)	- Impacts to community - Impacts to flora and fauna	C	3	Moderate	- Implement management measures in the Construction Air Quality Management Plan - Erosion and Sediment Control Plans approved before works commence - Activities undertaken in accordance with EPL - Use of recycled water for dust suppression	D	3	Low	Contractor's EM Contractor's CLM Contractor's PM
	Resource Use	- Clearing of site vegetation	- Depletion of natural resources - Greenhouse gas emissions	- Depletion of resources - Contribution to climate change	B	2	Moderat	- Inductions / toolbox training on waste management and energy saving practices in construction plantand equipment and during office work - No idling of plant equipment where possible onsite - Equipment / plant equipment inspections must be undertaken prior to use on site - Consideration will be given to material substitution where reasonable and feasible to reduce embodiedenergy of construction materials - Procurement of materials and consumables considering environmental impacts in their manufactureand disposal (e.g. silica fume for use within concrete, recycled paper, etc.) - Where possible locally sourced materials will be used to reduce GHG emissions associated withtransport during construction - Reduce carbon emissions and costs through under clearing	C	2	Low	Contractor's EM Site Supervisor
	Heritage	- Unexpected heritage itemsencountered	- Removal or disturbance to heritage items	- Work delays - Additional studies and approval required - Damage to heritage item	C	4	High	- Implement an Unexpected Finds Protocol - Inductions / toolbox training of heritage management protocols	E	4	Low	Contractor's CM Contractor's EM
	Noise and Vibration	- Clearing of site vegetation	- Production of noise and vibration	- Disruption to community - Damage to property - Disruption to fauna	B	3	High	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement community notification procedures - Determine vibration limits and structure/receiver offset distances	C	2	Low	Contractor's EM Contractor's CLM
	Contamination	- Remediation activities	- Pollution of surface water, groundwater and landthough spread of existing contamination within endangered ecological communities	- Water quality degradation - Killing of fauna, loss of amenity (e.g. fishing) - Contamination of ground	C	4	High	- Implement management measures in the Contamination Management Plan - Implement an Unexpected Finds Protocol	E	4	Low	Contractor's EMSub-contractors
	Air Quality	- Movement and deposition of fill (i.e. site levelling, importation andcompaction of fill material) - Use of vehicles and equipment - Stockpiling	- Production of particulates (i.e. dust or particulatematter)	- Impacts to community - Impacts to flora and fauna	C	3	Moderate	- Implement management measures in the Construction Air Quality Management Plan - Erosion and Sediment Control Plans approved before works commence - Activities undertaken in accordance with EPL - Use of recycled water for dust suppression	D	3	Low	Contractor's EM Contractor's CLM Contractor's PM

Construction Activity	Category	Environmental Aspect	Environmental Impact	Consequence	Likelihood	Consequenc	Rating	Control Measures (*Opportunities shown in green*)	Likelihood	Consequenc	Rating	Responsibility
Earthworks		- Contaminated material stockpiling	- Production of odours	- Impacts to community	B	2	Moderate	- Implement management measures in the Construction Air Quality Management Plan, ContaminationManagement Plan and Construction Demolition and Waste Management Plan - Activities undertaken in accordance with EPL	D	2	Low	Contractor's EM
	ERSED	- Stockpiling of soil	- Exposure of soils	- Increased sediment transport, sedimentation andturbidity - Soil loss - Increased runoff - Wind and water erosion causing weed/seed dispersaloffsite	B	4	Very High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Develop Environmental Control Maps to show stockpile areas - Minimise stockpiling as much as practicable - Locate stockpiles away from waterways, watercourses and drains - Reuse excavated material on site where possible	D	3	Low	Contractor's EM
		- Removal of soil - Placement of fill	- Erosion of soil	- Increased sediment transport, sedimentation andturbidity - Degradation of water quality - Damage to offsite flora and fauna habitat	B	4	Very High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Locate stockpiles away from waterways, watercourses and drains - Reuse excavated material on site where possible	D	3	Low	Contractor's EM
	Noise and vibration	- Earthworks activities	-Production of noise and vibration	- Disruption to community and fauna - Damage to property	B	3	High	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOH Protocol - Implement community notification procedures - Determine vibration limits and structure/receiver offset distances - Consult with potentially affected parties prior to commencement of works on their upcomingactivities that may be impacted by construction vibration and noise - On-going vibration monitoring during vibration intensive works	C	2	Low	Contractor's EM Contractor's CLM
	Visual	- Earthworks activities	- Changes to visual landscape	- Impacts to community - Visual amenity	B	2	Moderate	- Implement management measures in the Urban Design and Landscape Plan - Existing vegetation around the perimeter of construction sites would be retained - Develop and implement an Erosion and Sediment Control Plan	D	2	Low	Contractor's EM Contractor's CLM
		- Use of vehicles, plant and equipment - General construction activities	-Changes to visual landscape	- Impacts to community - Visual amenity	B	2	Moderate	- Elements within construction sites will be located to minimise visual impacts (e.g. setting back largeequipment from site boundaries, use of hoardings or progressive re-vegetation) - Regular maintenance will be undertaken of site hoardings and perimeter areas - Re-vegetation/landscaping would be undertaken progressively - Implement Fill Importation Management Protocol	D	2	Low	Contractor's EM Contractor's PM
		- Importation of fill during night-timehours	- Generation of light	- Light spill impacts to community and flora and fauna	C	3	Moderat	- Where required for construction works, cut-off and directed lighting would be used and lightinglocation considered to ensure glare and light spill are minimised	D	3	Low	Contractor's EM
	Traffic	- Use of heavy and light vehicles formaterial transportation	- Changes to local traffic conditions	- Disturbance to local road users and residents - Safety risk to road users - Potential for delays at local road access points	C	4	High	- Implement management measures in the Construction Traffic and Access Management Plan - Implement community notification procedures - Implement Fill Importation Management Protocol - Induction / toolbox training for traffic related protocols	D	3	Low	Contractor's CM Contractor's CLM
	Waste	- Excavation	- Generation of additional excavated material	- Loss of visual amenity - Degradation of water quality - Incorrect classification of waste resulting in incorrect /illegal disposal and/or re-use	B	3	High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - All material to be recovered offsite to be appropriately tested and classified against *EPA WasteClassification Guidelines* - Segregate top 100mm of topsoil and stockpile for use in rehabilitation	D	2	Low	Contractor's EM
	Acid Sulphate Soils	- Excavation	- Disturbance of potential acid sulphate soils andactual acid sulphate soils	- Mobilisation of metals within runoff which are toxic tonatural systems - Release of acidic runoff	C	3	Moderate	- Implement management measures in the Acid Sulphate Soils Management Plan - Provide awareness training in the identification and management of ASS - Ensure ASS material is left underwater, disposed of off-site or appropriately treated in a bunded area	D	2	Low	Contractor's CM Contractor's EM
	Biodiversity	- Removal of topsoil and soil	- Removal of vegetation	- Habitat loss - Fragmentation - Disturbance, injury or mortality to fauna - Transport of noxious weeds	C	4	High	- Implement management measures in the Construction Flora and Fauna Management Plan - Induction and tool box training on clearance zones and required protection measures - Demarcate the 10 metre buffer zone around threatened plant populations in bootland - Remove existing weeds species and prevent migration of species	E	4	Low	Contractor's EMSite Supervisor
	Heritage	- Unexpected heritage itemsencountered	- Removal or disturbance to heritage items	- Work delays - Additional studies and approval required - Damage to heritage item	C	4	High	- Implement an Unexpected Finds Protocol - Inductions / toolbox training of heritage management protocols	E	4	Low	Contractor's CM Contractor's EM

Construction Activity	Category	Environmental Aspect	Environmental Impact	Consequence	Likelihood	Consequenc	Rating	Control Measures (*Opportunities shown in green*)	Likelihood	Consequenc	Rating	Responsibility
Earthworks	Contamination	- Earthworks activities	- Creation of dirty water / pollution of waters - Pollution of surface water, groundwater and land though spread of existing contamination (PASS)	- Water quality degradation - Fauna mortality - Loss of amenity (e.g. fishing) - Safety risk to construction staff and community	A	3	High	- Implement management measures in the Construction Soil and Water Management Plan and the Contamination Management Plan - Implement an Erosion and Sediment Control Plan - Induction /tool box training on working in/near waterways.	C	3	Moderate	Contractor's EM Contractor's PM
		- Remediation activities	- Pollution of surface water, groundwater and land though spread of existing contamination	- Water quality degradation - Fauna mortality, loss of amenity (e.g. fishing) - Contamination of ground	C	4	High	- Implement management measures in the Contamination Management Plan - Implement an Unexpected Finds Protocol	E	4	Low	Contractor's EM Sub-contractors
		- Unexpected finds (including chemical contaminants, asbestos, UXO, EO and EOW)	- Pollution of surface water, groundwater and land though spread of existing contamination - Safety hazards associated with UXO, EO and EOW	- Water quality degradation - Fauna mortality - Loss of amenity (e.g. fishing) - Safety risk to construction staff and community	B	5	Very High	- Implement management measures in the Contamination Management Plan - Identify any contamination hotspots and incorporate procedures for these locations into construction documentation - Implement Unexpected Finds Protocol	C	4	High	Contractor's EM
Working near Georges River	Acid Sulphate Soils	- Excavation	- Disturbance of potential acid sulphate soils and actual acid sulphate soils	- Mobilisation of metals within runoff to levels toxic to natural systems - Release of acidic runoff	C	3	Moderate	- Implement management measures in the Acid Sulphate Soils Management Plan - Provide awareness training in the identification and management of ASS - Ensure ASS material is left underwater, disposed of site or appropriately treated in a bunded area	D	2	Low	Contractor's CM Contractor's EM
	ERSED	- Clearing of site vegetation	- Exposure of soils	- Increased sediment transport, sedimentation and turbidity - Soil loss - Increased runoff - Degradation of local watercourses	B	4	Very High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Locate stockpiles away from waterways, watercourses and drains - Induction / toolbox training on working in / near waterways.	D	4	Moderate	Contractor's EM
	Biodiversity	- Clearing of site vegetation	- Removal of vegetation	- Habitat loss - Fragmentation - Mortality -Transport of noxious weeds	C	4	High	- Implement management measures in the Construction Flora and Fauna Management Plan - Induction and tool box training on clearance zones and required protection measures - Staged habitat removal process - Clearly identify exclusion zones with high visibility fencing - Remove existing weeds species and prevent migration of species.	D	4	Moderate	Contractor's EM Site Supervisor
		- Impacts on aquatic ecology	- Disturbance to habitat - Degradation of water quality	- Mortality / morbidity of aquatic life - Habitat loss - Increased potential for algal blooms	C	4	High	- Implement management measures in the Construction Flora and Fauna Management Plan	D	4	Moderate	Contractor's EM Site Supervisor
Works on Anzac Creek	ERSED	- Clearing of site vegetation	- Exposure of soils	- Increased sediment transport, sedimentation and turbidity - Soil loss - Increased runoff - Degradation of local watercourses	B	4	Very High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Locate stockpiles away from waterways, watercourses and drains - Induction / toolbox training on working in / near waterways.	D	4	Moderate	Contractor's EM
	Biodiversity	- Clearing of site vegetation	- Removal of vegetation	- Habitat loss - Fragmentation - Mortality -Transport of noxious weeds	C	4	High	- Implement management measures in the Construction Flora and Fauna Management Plan - Induction and tool box training on clearance zones and required protection measures - Staged habitat removal process - Clearly identify exclusion zones with high visibility fencing - Remove existing weeds species and prevent migration of species.	D	4	Moderate	Contractor's EM Site Supervisor
		- Impacts on aquatic ecology	- Disturbance to habitat - Degradation of water quality	- Mortality / morbidity of aquatic life - Habitat loss - Increased potential for algal blooms	C	4	High	- Implement management measures in the Construction Flora and Fauna Management Plan	D	4	Moderate	Contractor's EM Site Supervisor
	Waste	- Dredging of Anzac Creek	- Generation of waste (i.e. sediment)	- Loss of visual amenity - Degradation of water quality - Incorrect classification of waste resulting in incorrect /illegal disposal and/or re-use	C	3	Moderate	- Implement management measures in the Construction Demolition and Waste Management Plan and Construction Soil and Water Management Plan relating to waste - Inductions / toolbox training on proper dredging protocols in accordance with appropriate waste guidelines	C	2	Low	Contractor's EM Site Supervisor
	Contamination	- Unexpected finds (including chemical contaminants, asbestos, UXO, EO and EOW)	- Pollution of surface water, groundwater and land though spread of existing contamination - Safety hazards associated with UXO, EO and EOW	- Water quality degradation - Fauna mortality - Loss of amenity (e.g. fishing) - Safety risk to construction staff and community	B	5	Very High	- Implement management measures in the Contamination Management Plan - Identify any contamination hotspots and incorporate procedures for these locations into construction documentation - Implement Unexpected Finds Protocol	C	4	High	Contractor's EM
Utilities and Excavation	Bushfire	- Excavation / ground penetration for utility works	- Sparks from activities	- Property damage - Destruction of flora and fauna	D	5	Moderate	- Implement management measures in the Construction Bushfire Management Plan - Conduct hot works permits - Consult with the RFS regarding bushfire risk	E	5	Moderate	Contractor's EM
	Biodiversity	- Excavation / ground penetration for utility works	- Creation of hazards for fauna	- Fragmentation - Mortality to flora and fauna	D	3	Low	- Implement management measures in the Construction Flora and Fauna Management Plan - Induction and tool box training on clearance zones and required protection measures - For animal injuries, contact the local wildlife rescue agency and/or veterinary surgery	E	3	Low	Contractor's EM Site Supervisor

Aspects and Impacts

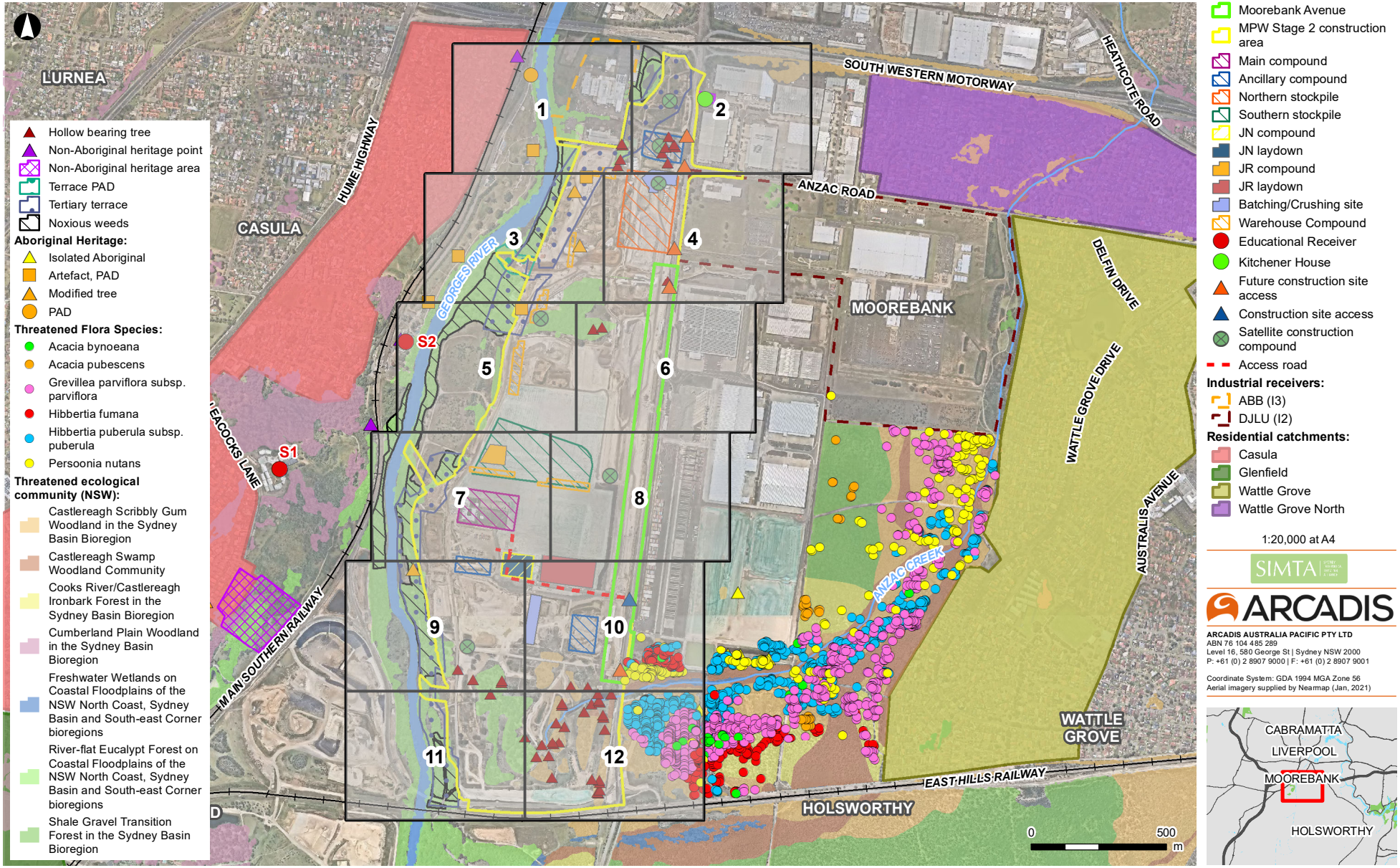
Heritage Removal	Heritage	- Unexpected heritage itemsencountered	- Removal or disturbance to heritage items	- Work delays - Additional studies and approval required - Damage to heritage item	C	4	High	- Implement an Unexpected Finds Protocol - Inductions / toolbox training of heritage management protocols	E	4	Low	Contractor's CMContractor's EM
		- Disturbance to heritage items	- Removal of heritage items	- Damage to heritage item - Damage to heritage values	C	4	High	- Implement management measures in the Construction Heritage Management Plan - Inductions / toolbox training on heritage management protocols - Label any known heritage items on Environmental Control Maps	E	4	Low	Contractor's EMSite Supervisor All Project personnel
Demolition of On Site Structures	Waste	- Removal of on site structures	- Generation of waste	- Visual amenity - Potential degradation of water quality - Deposition of large amounts to landfill	B	2	Moderate	- Implement management measures in the Construction Demolition and Waste Management Plan andConstruction Soil and Water Management Plan relating to waste - Inductions / toolbox training on proper demolition protocols in accordance with appropriateguidelines	B	1	Low	Contractor's EMSite Supervisor
	ERSED	- Removal of on site structures	- Exposure of soils	- Increased sediment transport, sedimentation andturbidity - Soil loss - Increased runoff	B	4	Very High	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Locate stockpiles away from waterways, watercourses and drains - Induction / toolbox training on the need to prevent pollution - Reuse excavated material on site where possible	D	3	Low	Contractor's EM
Demolition of On SiteStructures	Air Quality	- Removal of hazardous materials	- Production of particulates (ie.dust or particulatematter)	- Impacts to community - Impacts to flora and fauna	C	4	High	- Implement management measures in the Construction Air Quality Management Plan - Inductions / toolbox training on proper demolition protocols	D	3	Low	Contractor's EM Contractor's CLMSite Supervisor
		- Removal of on site buildings	- Production particulates (ie.dust or particulatematter)	- Impacts to community - Impacts to flora and fauna	C	3	Moderate	- Implement management measures in the Construction Air Quality Management Plan - Inductions / toolbox training on proper demolition protocols	D	3	Low	Contractor's EM Contractor's CLMSite Supervisor
	Resource use	- Use of vehicles, plant and equipment	- Depletion of natural resources - Greenhouse gas emissions	- Depletion of resources - Contribution to climate change	B	2	Moderat	- Inductions / toolbox training on waste management and energy saving practices in construction plantand equipment and during office work - No idling of plant equipment where possible onsite. - Equipment / plant equipment inspections must be undertaken prior to use on site - Consideration will be given to material substitution where reasonable and feasible to reduce embodiedenergy of construction materials - Procurement of materials and consumables considering environmental impacts in their manufactureand disposal (e.g silica fume for use within concrete, recycled paper, etc.) - Where possible locally sourced materials will be used to reduce GHG emissions associated withtransport during construction - Reduce carbon emissions and costs through under clearing -Engage local workforce /suppliers	C	2	Low	Contractor's EMSite Supervisor
	Biodiversity	- Removal of on site structures	- Removal of fauna	- Disturbance, injury or mortality to fauna	B	2	Moderate	- Implement management measures in the Construction Flora and Fauna Management Plan - For animal injuries, contact the local wildlife rescue agency and/or veterinary surgery	C	2	Low	Contractor's EMSite Supervisor
	Visual	- Use of vehicles, plant and equipment - Removal of on site structures	- Changes to visual landscape	- Impacts to community and surrounding streetscape - Visual amenity	B	2	Moderate	- Elements within construction sites will be located to minimise visual impacts, (e.g. setting back largeequipment from site boundaries, use of hoardings) - Implement management measures in the Urban Design and Landscape Plan	C	2	Low	Contractor's EM Contractor's CLMSite Supervisor
	Human Health	- Removal of potentially hazardousmaterials	- Hazardous materials	- Health impacts to workers	B	3	High	- Implement management measures in the Contamination Management Plan and ConstructionDemolition and Waste Management Plan - Wear appropriate PPE	C	2	Low	Contractor's EMSite Supervisor
	Noise and vibration	- Removing on site structures	- Production of noise and vibration	- Disruption to community and fauna - Damage to property	C	3	Moderat	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol (where applicable) - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on the upcoming activitiesthat may be impacted by construction vibration and noise - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations - Consider use of munchers rather than pneumatic breakers for concrete demolition	C	2	Low	Contractor's EM Contractor's CLM
	Contamination	- Remediation activities - Removal of on site structures potentially contaminated material	- Pollution of surface water, groundwater and landthough spread of existing contamination	- Water quality degradation - Fauna mortality, loss of amenity (e.g. fishing) - Contamination of ground	C	4	High	- Implement management measures in the Contamination Management Plan - Develop an Unexpected Finds Protocol - Implement management measures in the Construction Soil and Water Management Plan	D	3	Low	Contractor's EMSub-contractors
Activities involving Asbestos	Biodiversity	- Removal of asbestos from on site structures and asbestos contaminatedsoil	- Asbestos fibres becoming airborne - Removal of fauna	- Habitat loss - Fragmentation - Disturbance, injury or mortality to fauna	B	2	Moderate	- Implement management measure related to asbestos in the Contamination Management Plan and theConstruction Flora and Fauna Management Plan - General inductions toolbox training on asbestos management protocols - Asbestos to be removed in accordance with "The Code of Practice for the Same Removal of Asbestos(NOHSC, 2005) and Code of Practice: How to Safely Remove Asbestos (WorkCover NSW, 2017)	C	2	Low	Contractor's EMSite Supervisor
	ERSED	- Asbestos in or on soils and demolitionof waste materials	- Exposure of soils containing asbestos	- Increased sediment transport, sedimentation andturbidity - Soil loss - Increased runoff	C	3	Moderate	- Implement management measures in the Construction Soil and Water Management Plan - Implement an Erosion and Sediment Control Plan - Locate stockpiles away from waterways, watercourses and drains - Induction / toolbox training on the need to prevent pollution	D	3	Low	Contractor's EMSite

														Supervisor
	Air Quality	- Asbestos in or on soils and demolitionof waste materials	- Asbestos fibres becoming airborne	- Impacts to human health	C	4	High	- Implement management measures related to asbestos in the Contamination Management Plan - Inductions / toolbox training on asbestos management protocols - Wear appropriate PPE	D	3	Low	Contractor's EMSite Supervisor
	Waste	- Transport, handling and storage of asbestos from designated stockpiles and/or demolition waste	- Generation of waste	- Prosecution - Contamination of waste streams - Incorrect classification of waste resulting in incorrect /illegal disposal and/or re-use	C	4	High	- Implement management measures related to asbestos in the Contamination Management Plan andConstruction Demolition and Waste Management Plan - Inductions / toolbox training on asbestos management protocols	D	3	Low	Contractor's EMSite Supervisor
Crushing / ConcreteBatching	Noise and vibration	- Use of vehicles, plant and equipment	- Production of noise and vibration	- Disruption to community - Damage to property - Disruption to wildlife	B	3	High	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on the upcoming activitiesthat may be impacted by construction vibration and noise - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations	C	1	Low	Contractor's EM Contractor's CLM
	Air Quality	- Use of vehicles, plant and equipment	- Production of atmospheric pollutants	- Air quality degradation - Impacts to community - Impacts to flora and fauna	C	3	Moderate	- Implement management measures in the Construction Air Quality Management Plan - Activities to be undertaken in accordance with EPL - Concrete batching plant would be located centrally within the Project site	D	3	Low	Contractor's EM Contractor's CLMSite Supervisor
	ERSED	- Concrete batching	- Creation of dirty water / pollution of waters	- Degradation of local watercourses	B	3	High	- Implement management measures in the Construction Soil and Water Management Plan and theConcrete Batching Management Plan - Implement an Erosion and Sediment Control Plan - Locate washout bays away from waterways, watercourses and drains - Concrete washout areas of sufficient size suitable for construction activity undertaken are provided - Concrete washout areas are clearly marked on Environmental Control Maps and delineated - Inductions / toolbox talks on designated concrete washout areas.	D	3	Low	Contractor's EMSite Supervisor
	Visual	- Establishment of concrete batching site	- Changes to visual landscape	- Impacts to community and surrounding streetscape - Visual amenity	B	2	Moderate	- Implement management measures in the Urban Design and Landscape Plan - Elements within construction sites will be located to minimise visual impacts (e.g. setting back largeequipment from site boundaries, use of hoardings)	C	2	Low	Contractor's EM Contractor's CLMSite Supervisor
	Waste	- Concrete works	- Generation of concrete waste	- Depletion of natural resources and deposition of largeamounts of waste to landfill - Potential degradation of water quality	B	2	Moderate	- Implement management measures in the Construction Soil and Water Management Plan and theConstruction Demolition and Waste Management Plan - Implement an Erosion and Sediment Control Plan - Stockpiling of waste away from watercourses - Avoidance and reuse of material will have priority over recycling - Waste generation will be minimised by ordering the correct quantity of materials - Use local waste facilities	D	2	Low	Contractor's EM Contractor's PM
	Traffic	- Use of heavy and light vehicles formaterial transportation	- Changes to local traffic conditions	- Disturbance to local road users and residents - Safety risk to road users - Potential for delays at local road access points	C	4	High	- Implement management measures in the Construction Traffic and Access Management Plan - Implement community notification procedures - Implement Fill Importation Management Protocol - Induction / toolbox training for traffic related protocols	D	3	Low	Contractor's CM Contractor's CLM
	Bushfire	- Concrete works	- Sparks from activities	- Property damage - Destruction of flora and fauna	D	5	Moderate	- Implement management measures in the Construction Bushfire Management Plan - Conduct hot works permits - Consult with the RFS regarding bushfire risk	E	5	Moderate	Contractor's EM
Internal Road Construction	Air Quality	- Use of bitumen / road sealing	- Production of odours	- Impacts to community	C	2	Low	- Implement management measures in the Construction Air Quality Management Plan - Activities undertaken in accordance with EPL	D	2	Low	Contractor's EM Contractor's CLMSite Supervisor
	Noise and vibration	- Use of vehicles, plant and equipment	- Production of noise	- Disruption to community and fauna - Damage to property	B	3	High	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol (where applicable) - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on the upcoming activitiesthat may be impacted by construction vibration and noise - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations	C	2	Low	Contractor's EM Contractor's CLM
	Traffic	- Use of heavy and light vehicles formaterial transportation	- Changes to local traffic conditions	- Disturbance to local road users and residents - Safety risk to road users - Potential for delays at local road access points	C	4	High	- Implement management measures in the Construction Traffic and Access Management Plan - Ensure detour signage is used during road closures - Implement community notification procedures - Consultation in response to complaints will be undertaken	D	3	Low	Contractor's CM Contractor's CLM

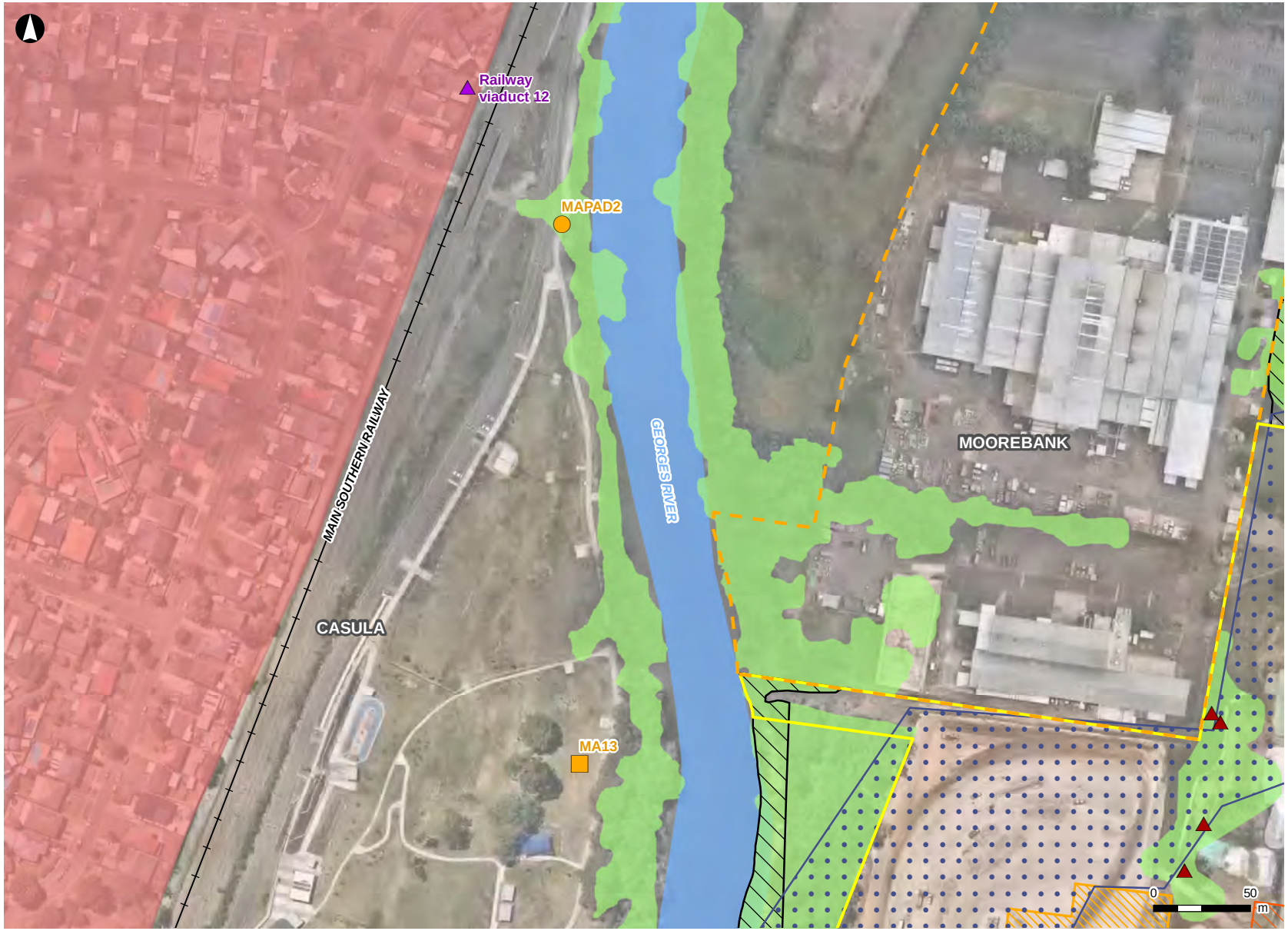
Moorebank Avenue and Anzac Road Intersection Works	Noise and vibration	- Use of vehicles, plant and equipment	- Production of noise	- Disruption to community and fauna - Damage to property	B	3	High	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on the upcoming activitiesthat may be impacted by construction vibration and noise - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations	C	2	Low	Contractor's EM Contractor's CLM
	Air Quality	- Use of bitumen / road sealing	- Production of odours	- Impacts to community	C	2	Low	- Implement management measures in the Construction Air Quality Management Plan - Activities undertaken in accordance with EPL	C	1	Low	Contractor's EM Contractor's CLMSite Supervisor
Warehouse Construction	Noise and vibration	- Use of vehicles, plant and equipment	- Production of noise	- Disruption to community and fauna - Damage to property	B	3	High	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on their upcomingactivities that may be impacted by construction vibration and noise - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations	C	2	Low	Contractor's EM Contractor's CLM
	Visual	- Use of vehicles, plant and equipment - Development of warehouses	- Changes to visual landscape	- Impacts to community and surrounding streetscape - Visual amenity	B	2	Moderate	- Implement management measures in the Urban Design and Landscape Plan - Elements within construction sites will be located to minimise visual impacts (e.g. setting back largeequipment from site boundaries, use of hoardings)	C	2	Low	Contractor's EM Contractor's CLMSite Supervisor
	Traffic	- Use of heavy and light vehicles formaterial transportation	- Oversized vehicle movements	- Disturbance to local road users and residents - Safety risk to road users - Potential for delays at local road access points	C	4	High	- Implement management measures in the Construction Traffic and Access Management Plan - Implement community notification procedures - Implement Fill Importation Management Protocol - Induction / toolbox training for traffic related protocols	D	3	Low	Contractor's CM Contractor's CLM
	Waste	- Construction activities associated withconstruction of warehouse	- Generation of construction waste	- Visual amenity - Deposition of large amounts to landfill - Potential degradation of water quality	B	2	Moderate	- Implement management measures in the Construction Demolition and Waste Management Plan andConstruction Soil and Water Management Plan relating to waste - Inductions / toolbox training on proper construction procedures for the building of warehouses	D	2	Low	Contractor's EM Contractor's PM
Landscaping	Waste	- Landscaping	- Generation of landscaping waste	- Depletion of natural resources and deposition of largeamounts of waste to landfill - Loss of visual amenity	B	2	Moderate	- Implement management measures in the Construction Demolition and Waste Management Plan - Avoidance and reuse of material will have priority over recycling - Waste generation will be minimised by ordering the correct quantity of materials - Use local waste facilities.	D	2	Low	Contractor's EM Contractor's PM
Rail Spur Activities	Noise and vibration	- Use of vehicles, plant and equipment	- Production of noise from tamping, ballastplacement and rail trimming	- Disruption to community and fauna - Damage to property	B	2	Moderate	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on the upcoming activitiesthat may be impacted by construction vibration and noise - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations	C	2	Low	Contractor's EM Contractor's CLM
	Rail Activities	- IMT facility and rail link connectionactivities	- Disruption to rail movement	- Loss of revenue from existing rail activities	A	4	Very High	- Conduct activities during hours that have potential to result in the least impact to existing rail activities	A	3	High	Contractor's PM
Noise Wall Construction	Noise and vibration	- Use of vehicles, plant and equipment	- Production of noise from noise wall constructionactivities	- Disruption to community and fauna - Damage to property	B	2	Minor	- Implement management measures in the Construction Noise and Vibration Management Plan - Implement OOHW Protocol - Conduct community notification procedures - Consult with potentially affected parties prior to commencement of works on the upcoming activitiesthat may be impacted by construction vibration and noise - Consultation in response to complaints will be undertaken - Provide periods of respite for high noise generating activities - On-going noise and vibration monitoring during vibration and noise intensive works at receiverlocations	C	2	Low	Contractor's EM Contractor's CLM

Likelihood	**Consequence**				
	1 – Not significant	2 – Minor	3 – Moderate	4 – Major	5 - Severe
A – Almost certain	Moderate	Moderate	High	Very High	Very High
B – Likely	Low	Moderate	High	Very High	Very High
C – Possible	Low	Low	Moderate	High	High
D – Improbable	Low	Low	Low	Moderate	Moderate
E – Rare	Low	Low	Low	Low	Moderate

APPENDIX C – ENVIRONMENTAL CONTROL MAPS



Appendix C: MPW Stage 2 Construction Environmental Control Map Overview



MPW Stage 2 construction area
Northern stockpile
Tertiary terrace
Noxious weeds
Indicative Warehouse Construction Compound
Hollow bearing tree

Aboriginal Heritage:
Artefact, PAD
PAD
Non-Aboriginal heritage point

Industrial receivers:
ABB (I3)

Residential catchments:
Casula

Threatened ecological community (NSW):
River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

1:3,000 at A4

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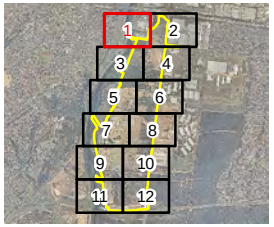

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Created by : EM Updated by EM QA by KP

- MPW Stage 2 construction area
- Ancillary compound
- Northern stockpile
- Tertiary terrace
- Noxious weeds
- Satellite construction compound
- Potential Concrete Batching/Crushing site
- Future construction site access
- Hollow bearing tree
- Non-Aboriginal heritage area

Industrial receivers:

- ABB (I3)
- DJLU (I2)

Threatened ecological community (NSW):

- Castlereagh Scribbly Gum Woodland in the Sydney Basin Bioregion
- River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

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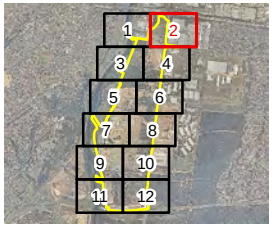

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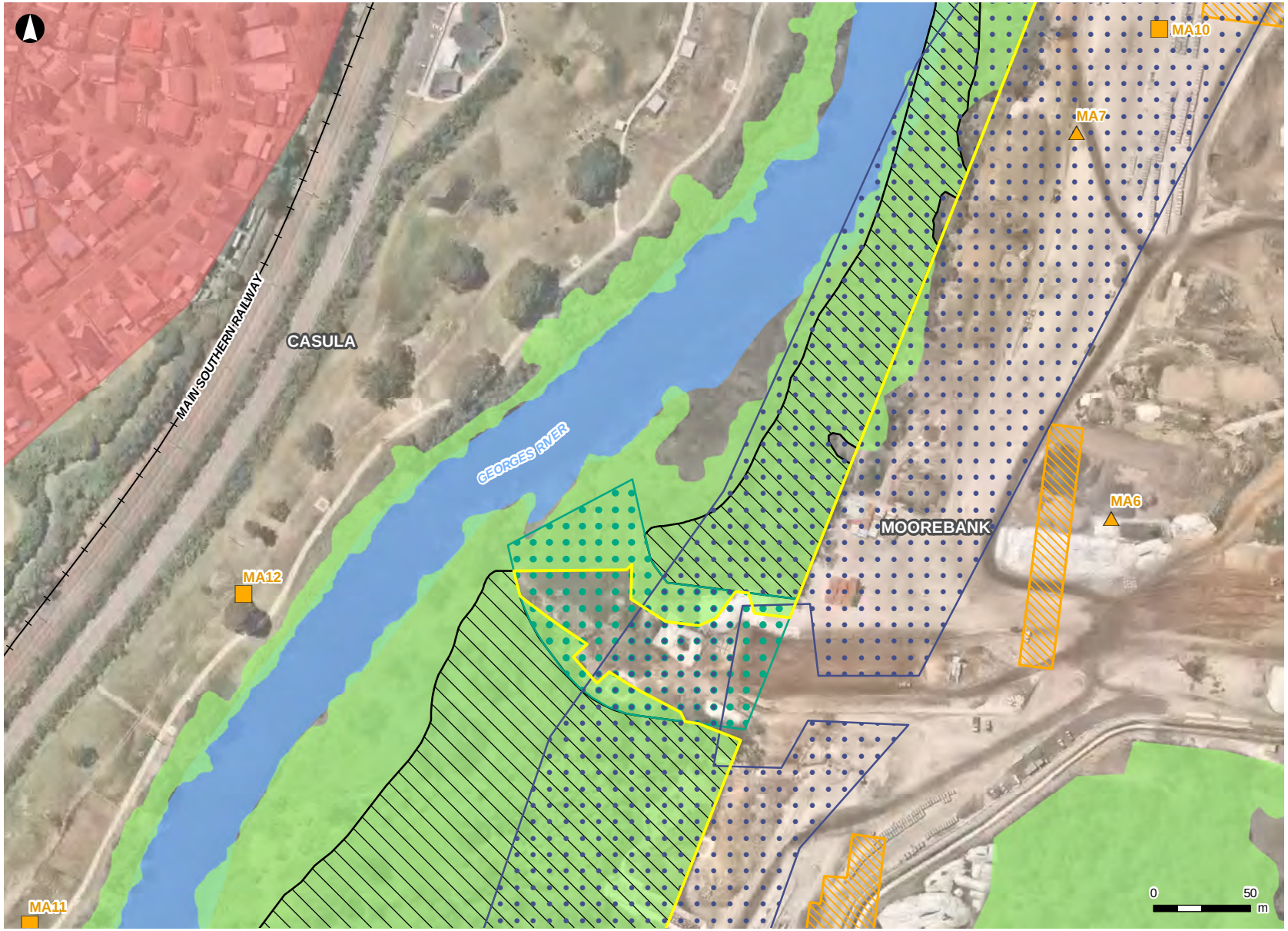

MPW Stage 2 construction area
Terrace PAD
Tertiary terrace
Noxious weeds
Indicative Warehouse Construction Compound

Aboriginal Heritage:
Artefact, PAD
Modified tree

Residential catchments:
Casula

Threatened ecological community (NSW):
River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

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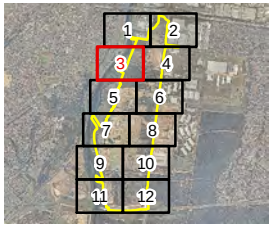

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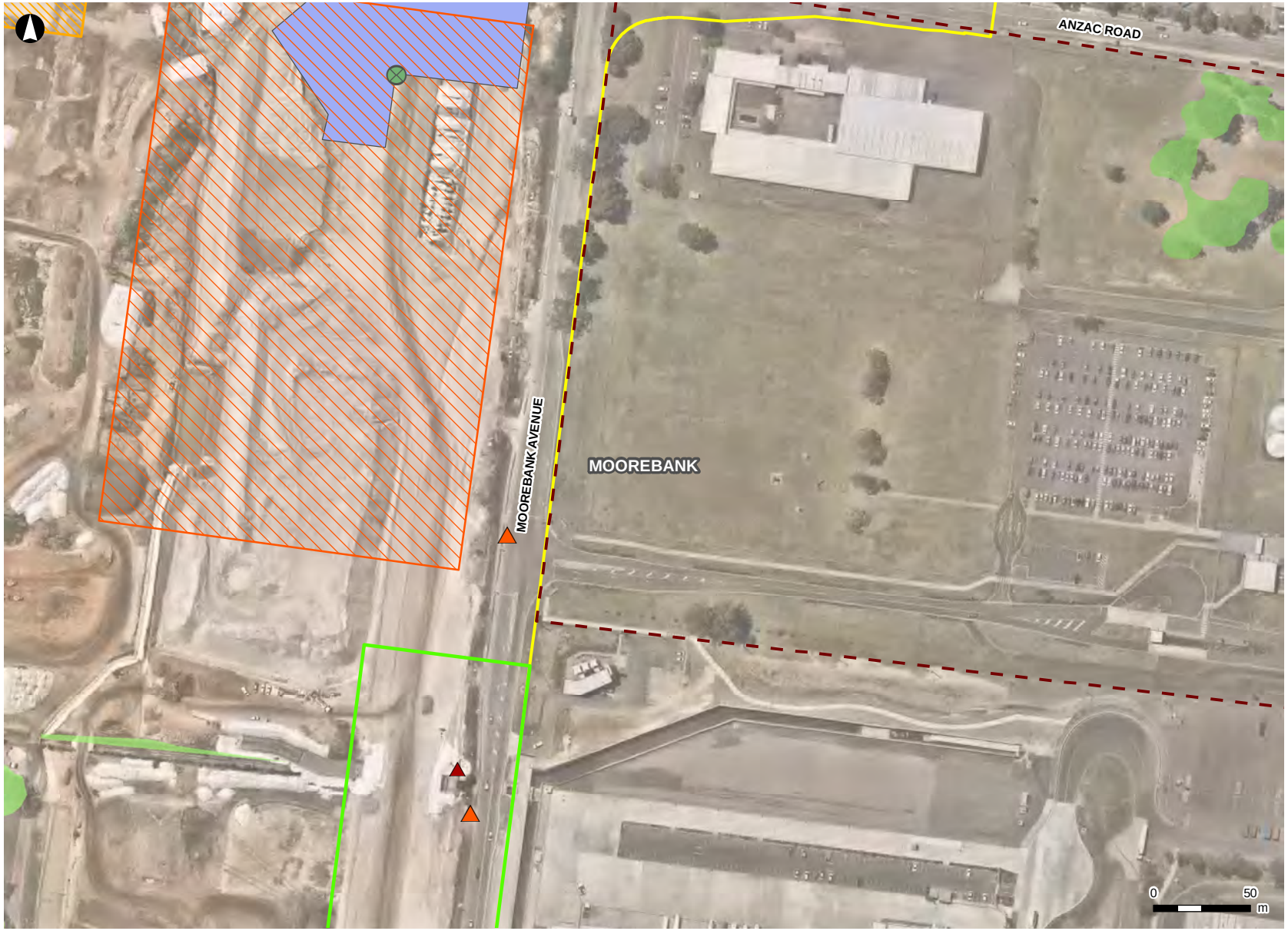

- MPW Stage 2 construction area
- Moorebank Avenue site
- Northern stockpile
- Satellite construction compound
- Indicative Warehouse Construction Compound
- Potential Concrete Batching/Crushing site
- Future construction site access
- Hollow bearing tree

Industrial receivers:
- DJLU (I2)

Threatened ecological community (NSW):
- River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions
- Shale Gravel Transition Forest in the Sydney Basin Bioregion

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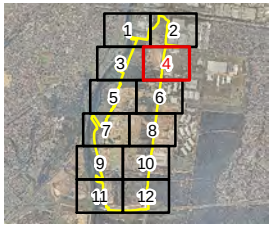

Appendix C: MPW Stage 2 Construction Environmental Control Maps

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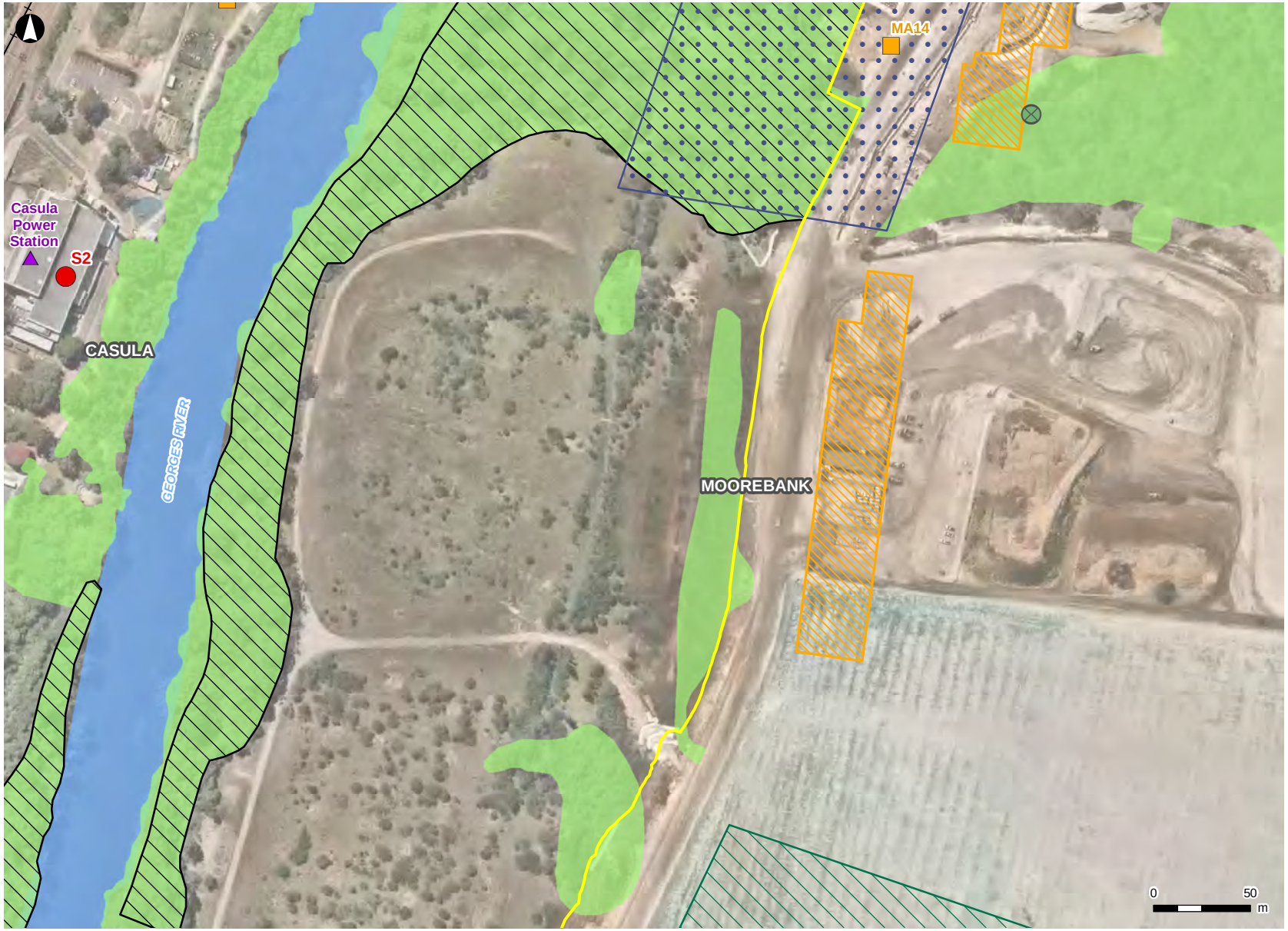

MPW Stage 2 construction area
Southern stockpile
Tertiary terrace
Noxious weeds
Satellite construction compound
Indicative Warehouse Construction Compound
Educational Receiver

Aboriginal Heritage:
Artefact, PAD
Non-Aboriginal heritage point

Threatened ecological community (NSW):
River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

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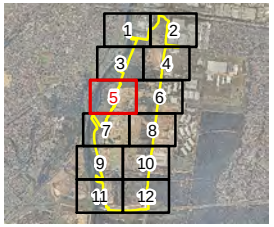

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Created by : EM Updated by EM QA by KP

MPW Stage 2 construction area

Moorebank Avenue site

Hollow bearing tree

Threatened ecological community (NSW):

River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

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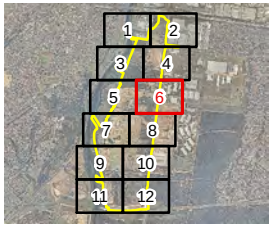

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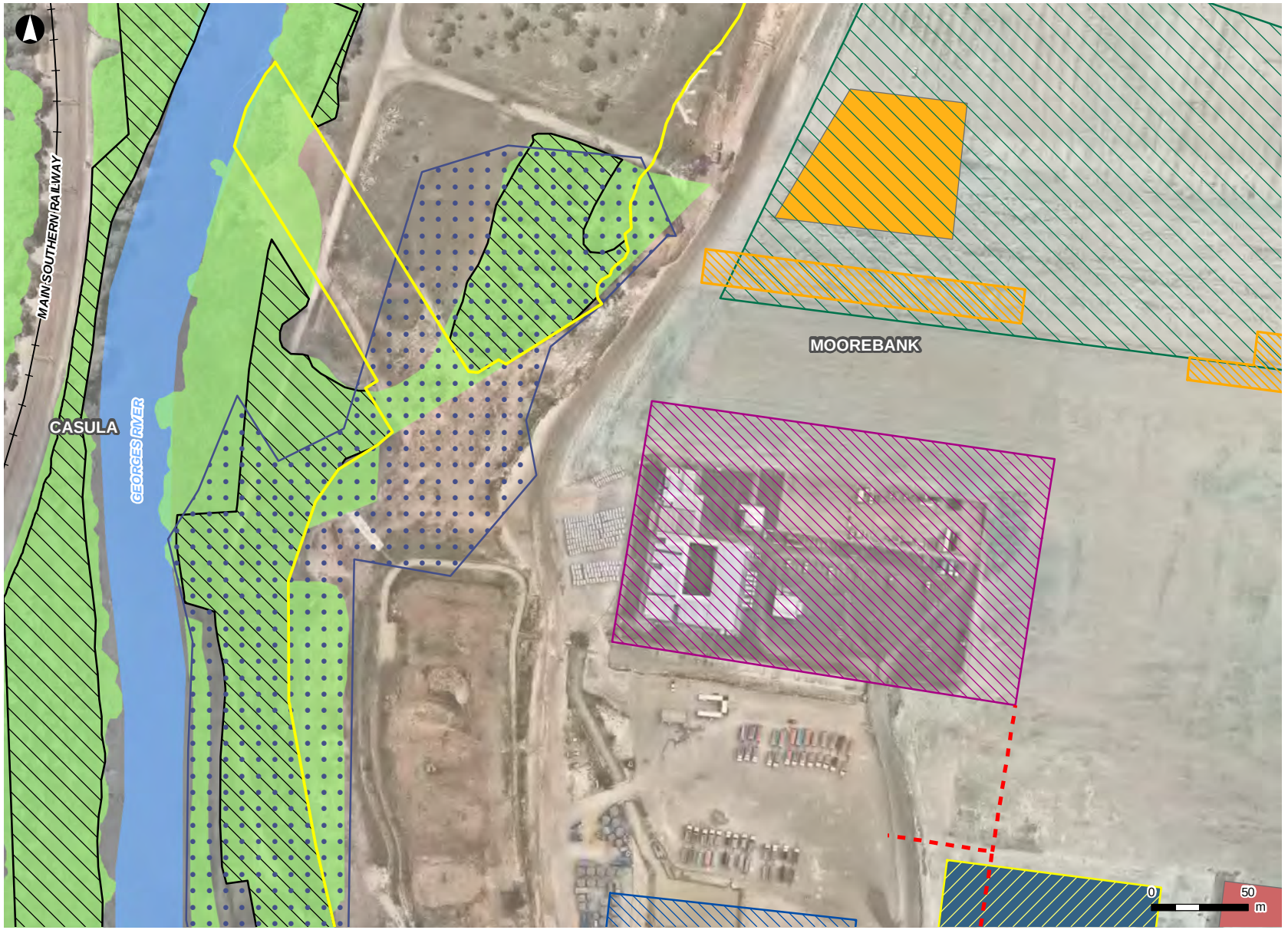

MPW Stage 2 construction area
Main compound
Ancillary compound
Southern stockpile
Tertiary terrace
Noxious weeds
Access road
Indicative Warehouse Construction Compound
JN compound
JN laydown
JR compound
JR laydown

Threatened ecological community (NSW):

River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

1:3,000 at A4

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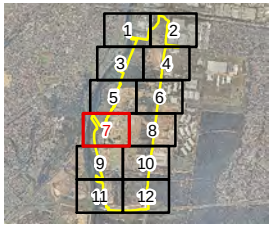

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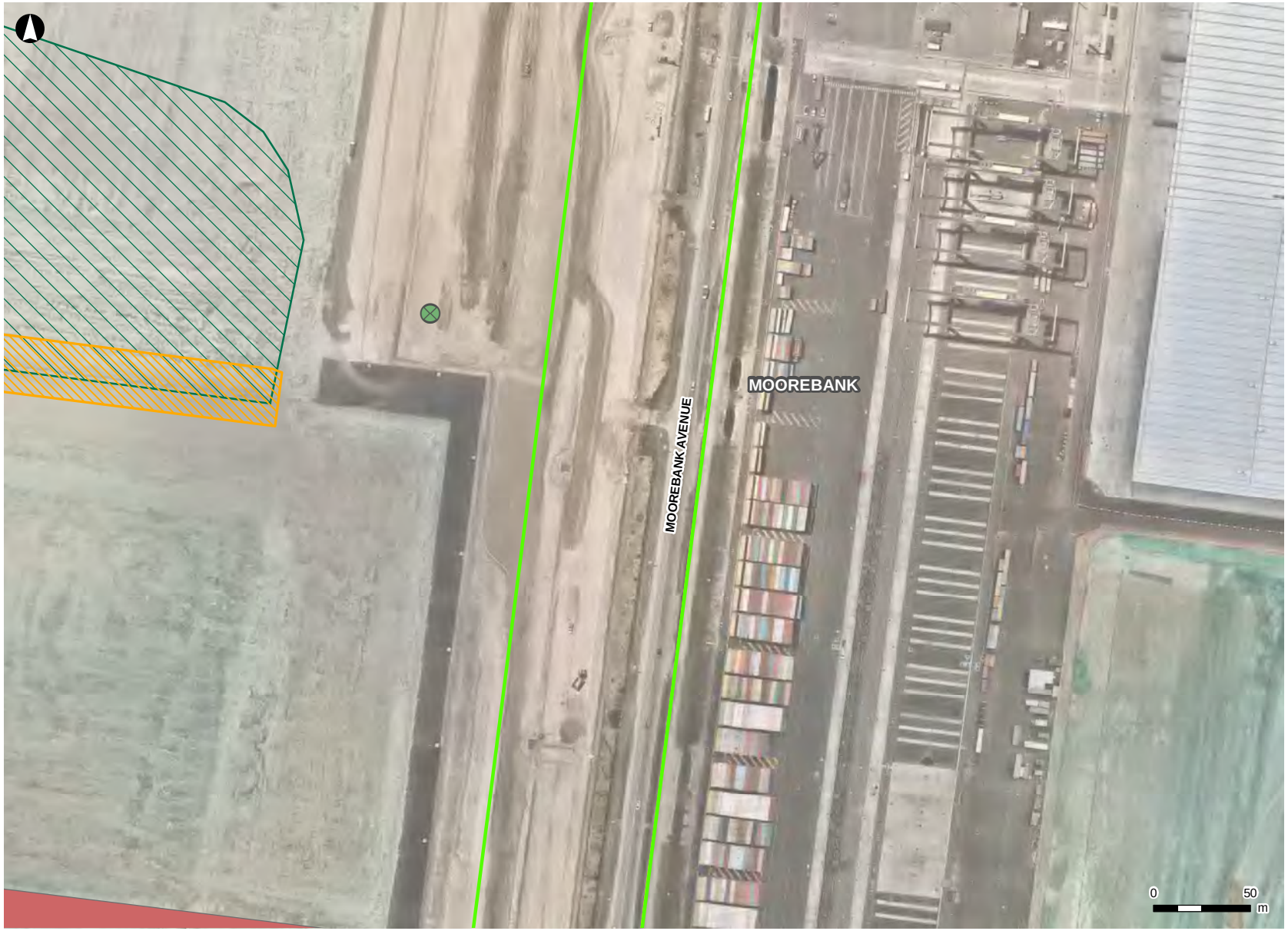

MPW Stage 2 construction area
Moorebank Avenue site
Southern stockpile
Satellite construction compound
Indicative Warehouse Construction Compound
JR laydown

1:3,000 at A4

SIMTA

ARCADIS

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 16, 580 George St | Sydney NSW 2000
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Coordinate System: GDA 1994 MGA Zone 56
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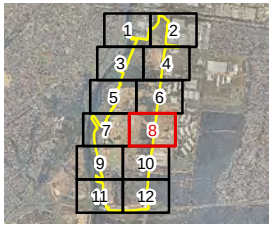

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MPW Stage 2 construction area
Ancillary compound
Tertiary terrace
Noxious weeds
Access road
Satellite construction compound
JN compound
JN laydown
Potential Concrete Batching/Crushing site
Hollow bearing tree

Aboriginal Heritage:
Modified tree

Threatened ecological community (NSW):
River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

1:3,000 at A4

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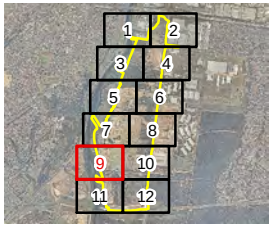

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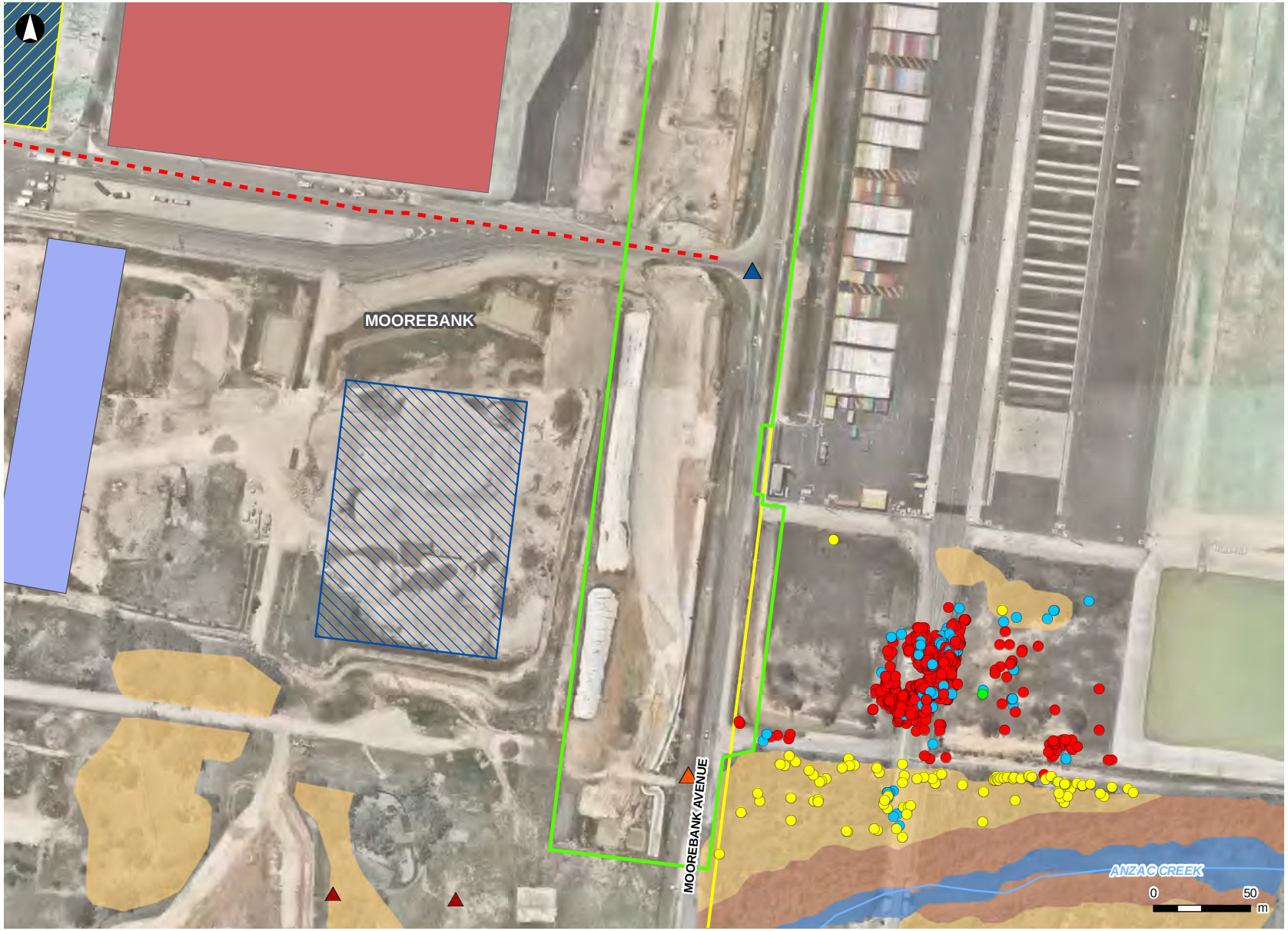

- MPW Stage 2 construction area
- Moorebank Avenue site
- Ancillary compound
- Access road
- JN compound
- JN laydown
- JR laydown
- Potential Concrete Batching/Crushing site
- Future construction site access
- Construction site access
- Hollow bearing tree

Threatened Flora Species:

- Acacia bynoeana
- Hibbertia fumana
- Hibbertia puberula subsp. puberula
- Persoonia nutans

Threatened ecological community (NSW):

- Castlereagh Scribbly Gum Woodland in the Sydney Basin Bioregion
- Castlereagh Swamp Woodland Community
- Freshwater Wetlands on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

1:3,000 at A4

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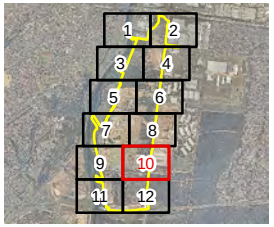

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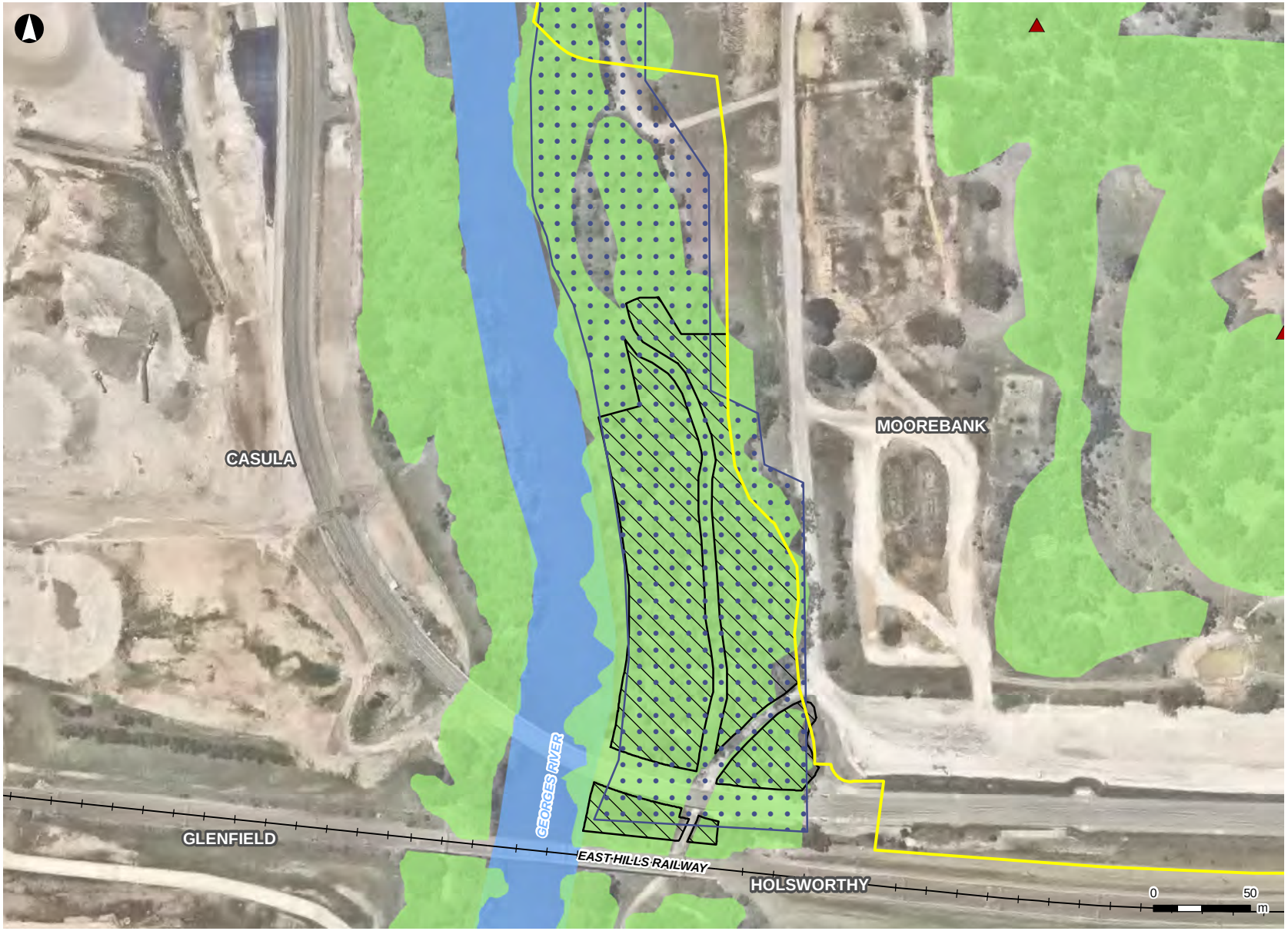

MPW Stage 2 construction area
Tertiary terrace
Noxious weeds
Hollow bearing tree

Threatened ecological community (NSW):

River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

1:3,000 at A4

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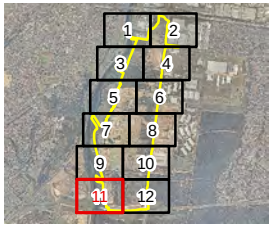

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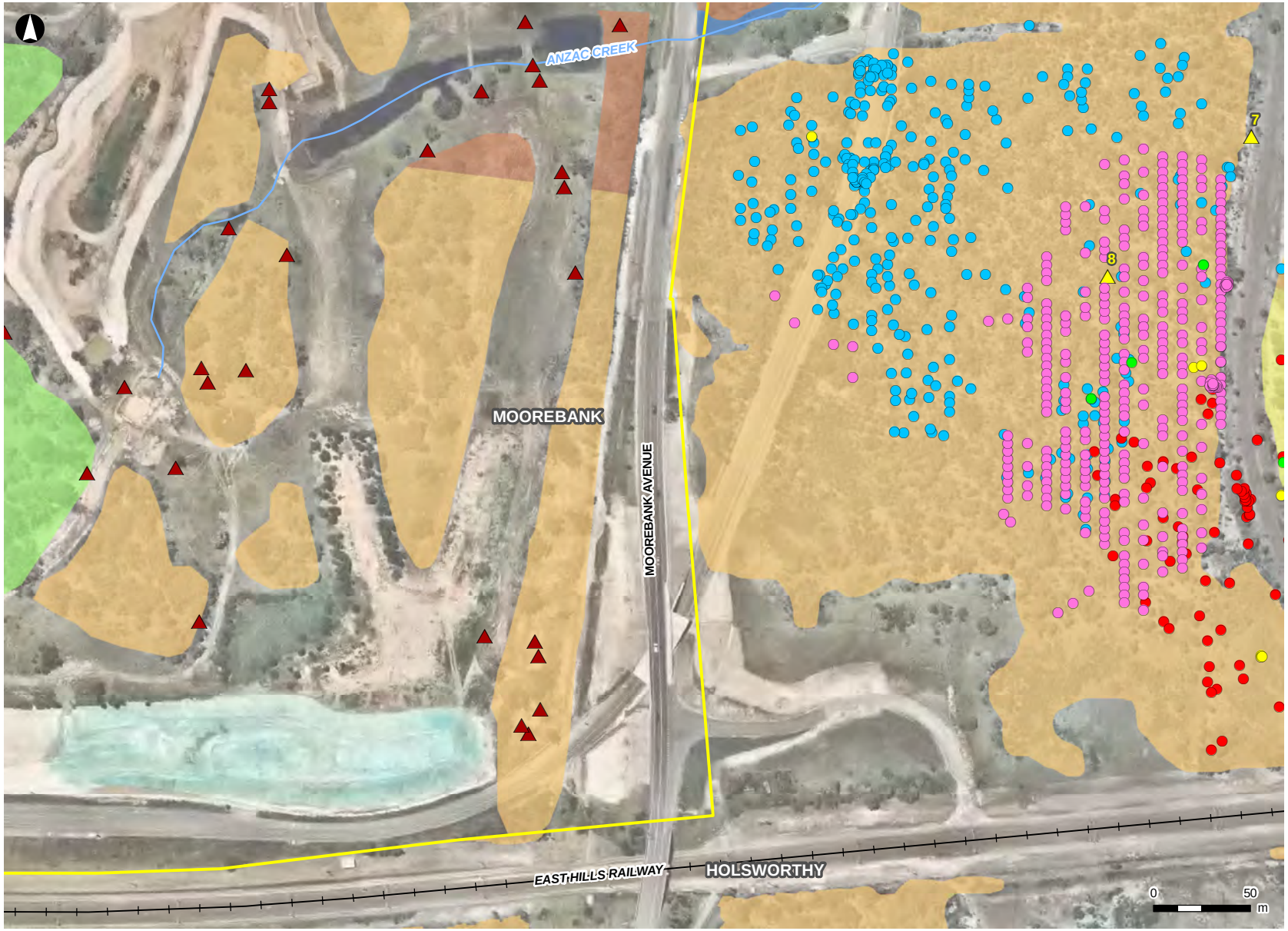

MPW Stage 2 construction area
Hollow bearing tree
Threatened Flora Species:
Acacia bynoeana
Grevillea parviflora subsp. parviflora
Hibbertia fumana
Hibbertia puberula subsp. puberula
Persoonia nutans
Aboriginal Heritage:
Isolated Aboriginal find
Threatened ecological community (NSW):
Castlereagh Scribbly Gum Woodland in the Sydney Basin Bioregion
Castlereagh Swamp Woodland Community
Cooks River/Castlereagh Ironbark Forest in the Sydney Basin Bioregion
Freshwater Wetlands on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions
River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions

1:3,000 at A4

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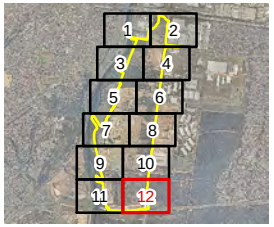

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APPENDIX D – UNEXPECTED FINDS PROTOCOLS

UNEXPECTED FINDS PROTOCOL

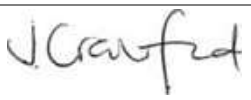
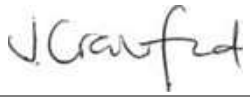
Moorebank Precinct West Stage 2

02 AUGUST 2019

SYDNEY INTERMODAL TERMINAL ALLIANCE

Moorebank Precinct East Stage 2

Unexpected Finds Protocol

Author	Ketan Patel	
Checker	Jamie Crawford	
Approver	Jamie Crawford	

Report No MIC2-QPMS-EN-APP-00022

Date 27/08/2019

Revision Text 005

Author Details

Author Details	Qualifications and Experience
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REVISIONS

Revision	Date	Description	Prepared by	Approved by
001	27/07/2018	Draft for review	AK	KP
002	14/09/2018	Second draft for client review	KN	JC
003	26/10/2018	Issued for ER Review	JC	JC
004	02/08/2019	Updated based on Conditions of Consent	KP	KP
005	27/08/2019	Updated to reflect the CFFMP	KP	KP

ACRONYMS AND DEFINITIONS

Acronym/Term	Meaning
BAR	Biodiversity Assessment Report
CFFMP	Construction Flora and Fauna Management Plan
CoCs	Conditions of Consent
DoTEE	Commonwealth Department of the Environment and Energy
EM	Contractor's Environment Manager
EP&A Act	*Environmental Planning and Assessment Act, 1979*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
MPW	Moorebank Precinct West
OEH	NSW Office of Environment and Heritage
PE	Project Ecologist
PFAS	Per & Poly-Fluoroalkyl Substances
RCMM	Revised Compilation of Mitigation Measures
SIMTA	Sydney Intermodal Terminal Alliance
SSD	State significant development
UFP	Unexpected Finds Protocol

CONTENTS

APPENDICES

LIST OF TABLES

1 INTRODUCTION

The Sydney Intermodal Terminal Alliance (SIMTA) received approval for the construction and operation of Stage 2 of the Moorebank Precinct West (MPW) Project (SSD 7709), which comprises the second stage of development under the MPW Concept Approval (SSD 5066). This Unexpected Finds Protocol (UFP) has been developed to manage the unexpected discovery of contamination within imported spoil, heritage items, threatened flora and fauna, and onsite contamination during the construction phase of Stage 2 of the Moorebank Precinct West (MPW) Project (the Project).

Within this protocol, a strategy has been established to demonstrate the Construction Contractor's approach to the management of unexpected discoveries.

1.1 Objectives and Targets

Refer to Table 1 for high level objectives and targets set for the Project for the management of unexpected discoveries.

Table 1 Objectives and Targets

Objective	Target	Timeframe	Accountability
To implement the unexpected finds protocol to minimise impacts of imported spoil	STOP works in 100% cases where potential contamination is identified in accordance with the Unexpected (Contamination within Imported Spoil) Finds Protocol (Appendix A)	Duration of works	Contractor's CM
To implement the unexpected finds protocol to minimise impacts on unknown heritage items	STOP works in 100% cases where potential heritage is identified in accordance with the Unexpected (Heritage) Finds Protocol (Appendix B)	Duration of works	Contractor's CM
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 Project Site	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)	Duration of works	Contractor's CM
To implement the unexpected finds protocol to minimise the impacts of onsite contamination that has not previously been recorded within the Project site.	Stop relevant works in 100% of cases where potential contamination is identified in accordance with the Unexpected Finds (Onsite Contamination) Protocol (Appendix D)	Duration of works	Contractor's CM

2 ENVIRONMENTAL MANAGEMENT

2.1 Compliance Matrices

The Project is being delivered under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act, 1979* (EP&A Act). The Conditions of Consent (CoCs) include requirements to be addressed in this protocol and delivered during the Project. These requirements, and how they are addressed are provided within Table 2.

Table 2 Conditions of Consent (CoCs)

CoC	Requirement	Plan Section	How Addressed
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 D	This Protocol
B175	The CEMP required under **Condition C2** must include an Unexpected Finds Protocol(s) for, but not limited to, contamination, ordnances, Aboriginal sites, non-indigenous heritage and flora and fauna.	Appendix B	This Protocol

The Revised Compilation of Mitigation Measures (RCMMs) were prepared as part of the Response to Submissions (Arcadis 2017). A list of the RCMMs as relevant to the Project and how they have been complied within this protocol are provided in Table 3.

Table 3 Revised Compilation of Mitigation Measures (RCMMs)

RCMM	Requirement	Document Reference
6A	The CEMP would identify the actions to be taken should additional contamination be identified during the development of the site (i.e. an unexpected finds protocol), and will address REMM items 8H, 8T, 8U, 8V and 8W (of the MPW Concept Approval (SSD 5066)).	Appendix D
9E	An unexpected finds procedure would be included in the ACHAR and in place for the construction phase of the Proposal.	Appendix B
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 A Appendix B
10C	An unexpected finds protocol (or equivalent) would be included within the CEMP. If unexpected finds are identified during works, a suitably qualified archaeological consultant would be engaged to assess the significance of the finds and the NSW Heritage Council notified. In this instance, further archaeological work or recording may be required.	Appendix B

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval for the MPW Concept was granted by the Commonwealth Department of the Environment and Energy (DoTEE) in September 2016 (No. 2011/6086). This approval was provided for the impact of the MPW Project on listed threatened species and communities (Sections 18 and 18A of the EPBC Act) and Commonwealth action (Section 28 of the EPBC Act).

The construction and operation of the Project has been designed to be consistent with the EPBC Act Approval conditions, where relevant. EPBC Act Approval conditions for the Project include specific conditions

and commitments that are required to be addressed in this UFP. These conditions relevant to this UFP are identified below in Table 4.

Table 4 Commonwealth Approvals

Commonwealth	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	Refer to the Moorebank Precinct West – Early Works Per & Poly-Fluoroalkyl Substances (PFAS) Management Plan

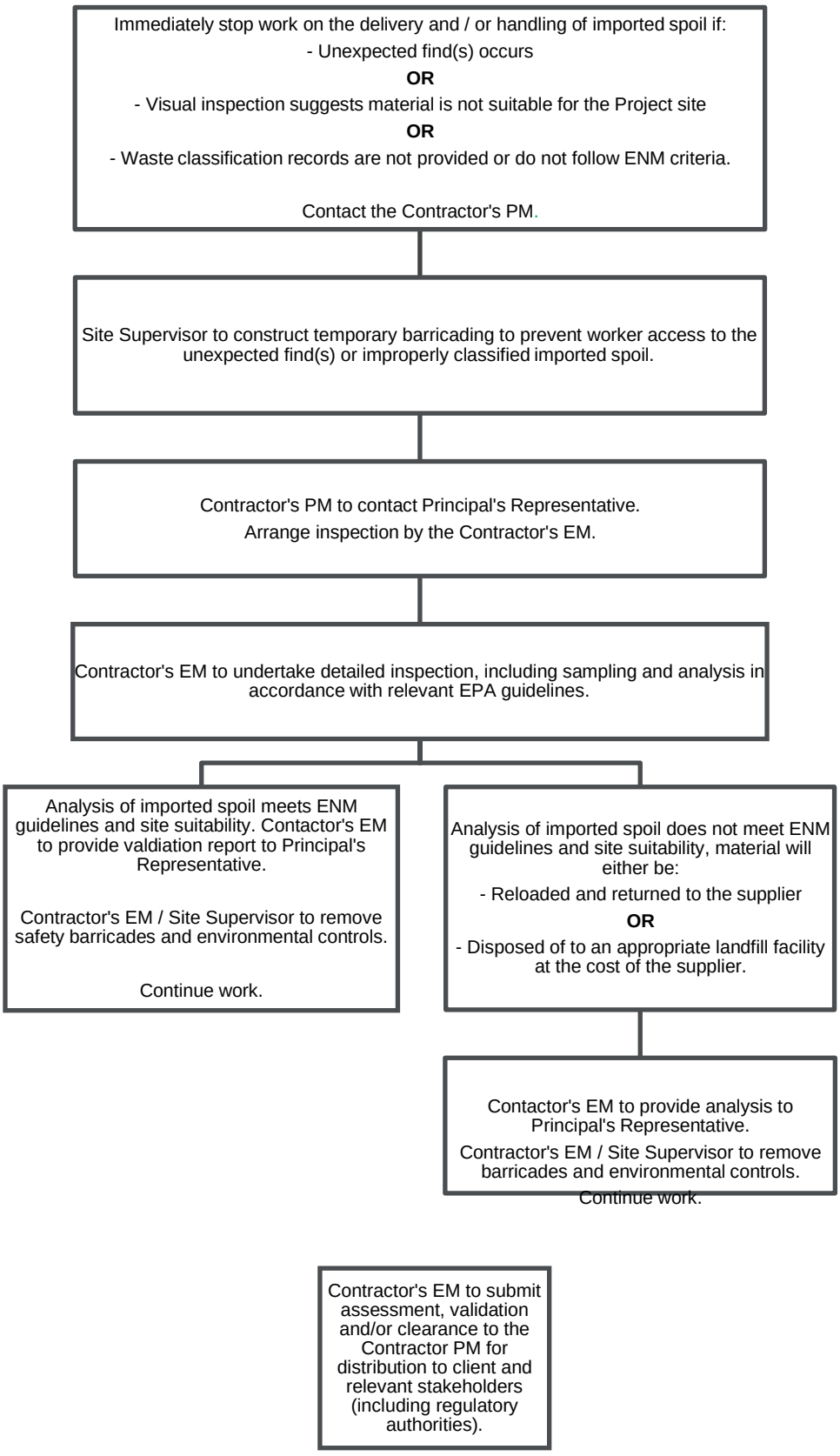
2.2 Unexpected Finds Protocols

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

- Contamination within imported spoil
- Aboriginal and non-Aboriginal finds
- Threatened flora and/or fauna species or threatened ecological communities
- Onsite contamination including ordnance.

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

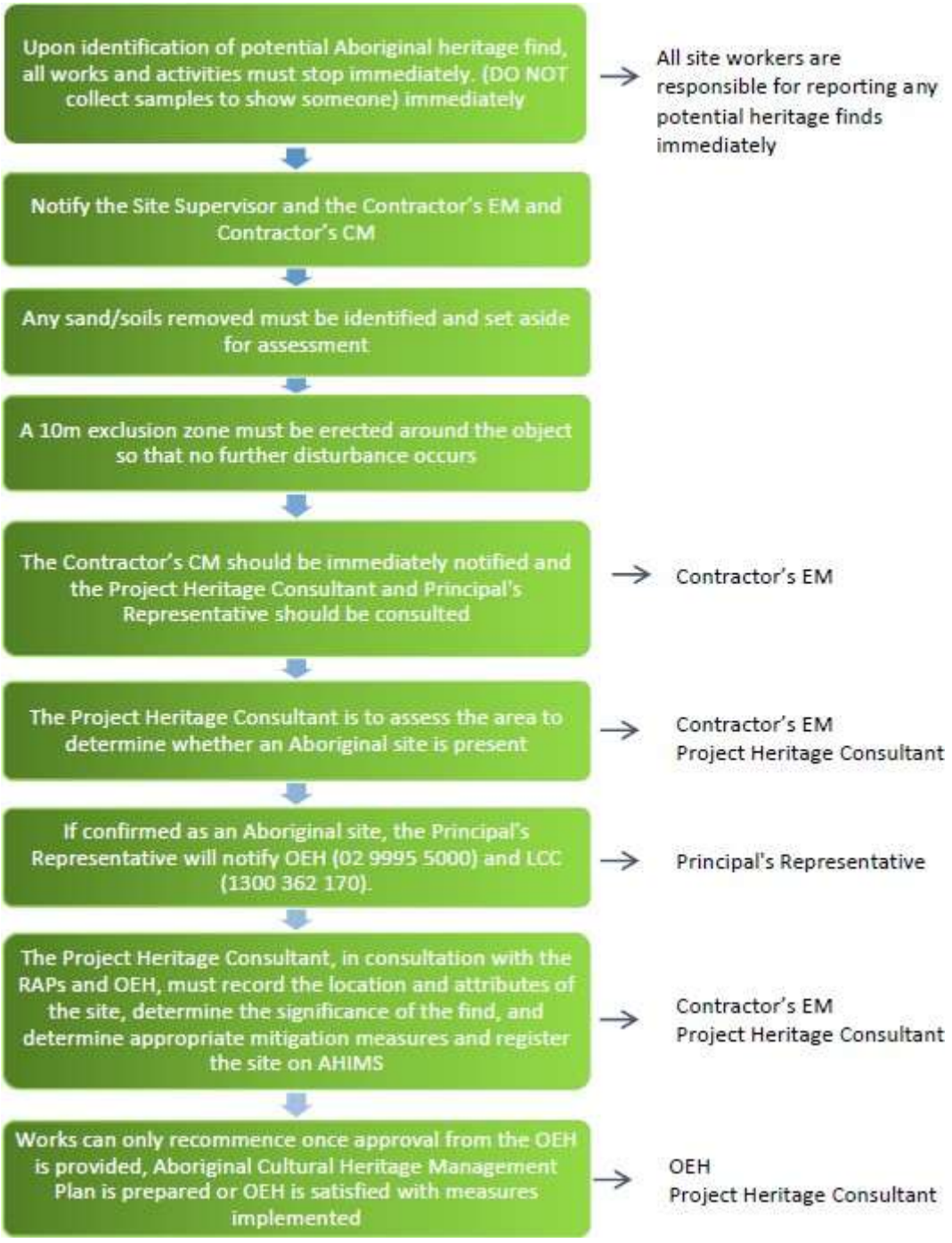
APPENDIX A UNEXPECTED (CONTAMINATION WITHIN IMPORTED SPOIL) FINDS PROTOCOL


Immediately stop work on the delivery and / or handling of imported spoil if:
- Unexpected find(s) occurs
OR
- Visual inspection suggests material is not suitable for the Project site
OR
- Waste classification records are not provided or do not follow ENM criteria.
Contact the Contractor's PM.
Site Supervisor to construct temporary barricading to prevent worker access to the unexpected find(s) or improperly classified imported spoil.
Contractor's PM to contact Principal's Representative.
Arrange inspection by the Contractor's EM.
Contractor's EM to undertake detailed inspection, including sampling and analysis in accordance with relevant EPA guidelines.
Analysis of imported spoil meets ENM guidelines and site suitability. Contactor's EM to provide valdiation report to Principal's Representative.
Contractor's EM / Site Supervisor to remove safety barricades and environmental controls.
Continue work.
Analysis of imported spoil does not meet ENM guidelines and site suitability, material will either be:
- Reloaded and returned to the supplier
OR
- Disposed of to an appropriate landfill facility at the cost of the supplier.
Contactor's EM to provide analysis to Principal's Representative.
Contractor's EM / Site Supervisor to remove barricades and environmental controls.
Continue work.
Contractor's EM to submit assessment, validation and/or clearance to the Contractor PM for distribution to client and relevant stakeholders (including regulatory authorities).

APPENDIX B UNEXPECTED (HERITAGE) FINDS

Unexpected (Heritage) Finds Protocol

Aboriginal Heritage



Examples of Potential Unexpected Aboriginal Finds

It is highly unlikely that any 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.

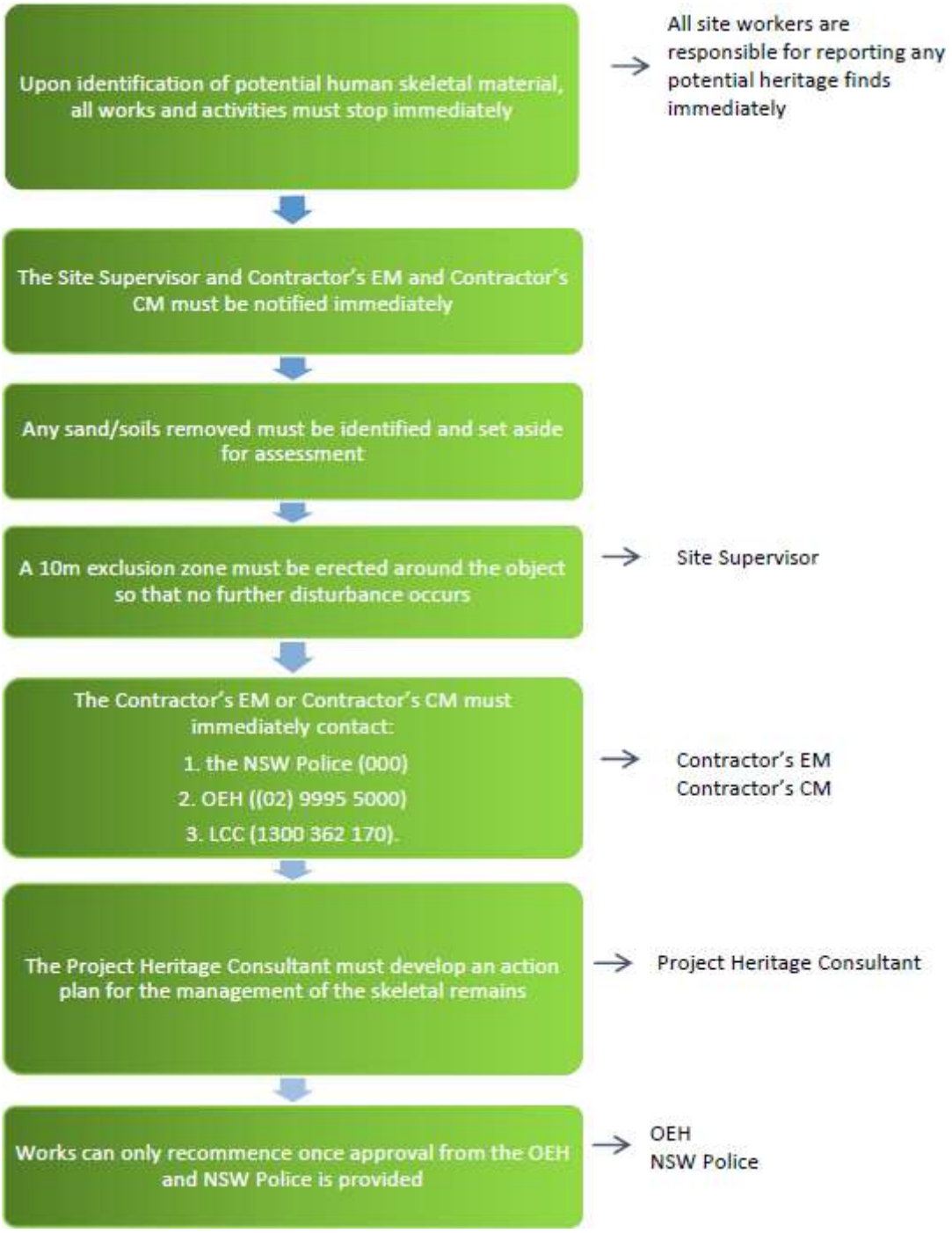
Typical characteristics of flaked stone tools include:

- Sharp edges.
  - Retouch along one or more edges.
  - Stone rich in silica.

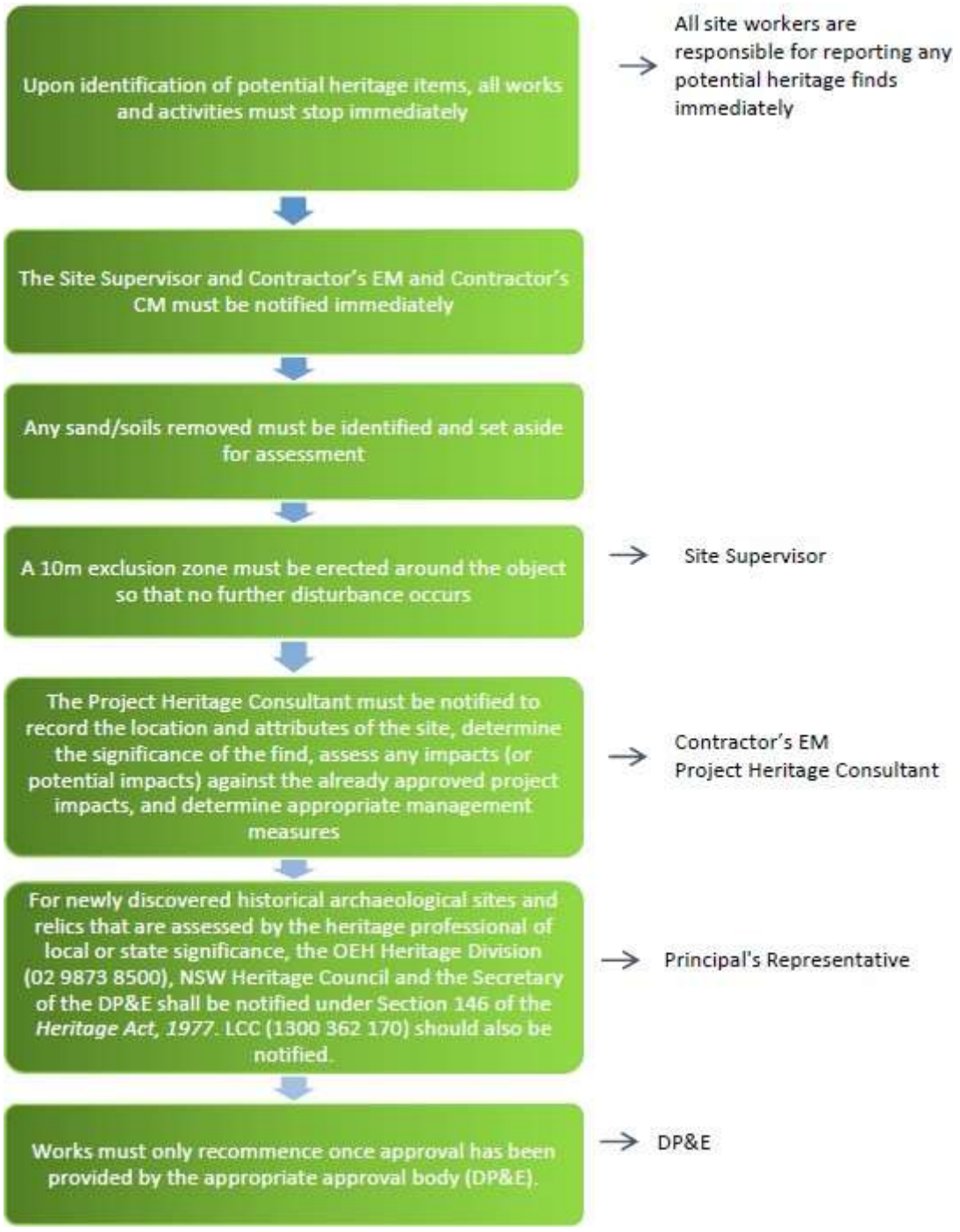
  - Stone type often different to the natural rock in the area.
- Flakes
  - Usually less than 50 mm long.
  - A ‘striking platform’ visible.
  - Impact point often present on the striking platform.
  - A ‘bulb of percussion’ often present below the striking platform.
  - May have been shaped into a recognisable tool form, such as a 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

Unexpected (Biodiversity) Finds protocol

Purpose

This Unexpected Finds Protocol explains the actions and measures to be implemented if any threatened flora and/or fauna species or threatened ecological communities that have not been previously recorded within the Project Site (as identified in the documents outlined in CoC A3) are identified during construction.

Training

All personnel undertaking construction activities within the Project site will be inducted on the identification of known and potential threatened species and ecological communities occurring on site, and will be trained in this protocol through Toolbox Talks or a site induction.

Protocol

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

1. **STOP ALL WORK** in the vicinity of the find. Immediately notify the Contractor's Environment Manager (Contractor's EM) who will notify the Project Ecologist (PE) and Principal's Representative. The project ecologist must confirm the presence of the threatened species.
2. **EXCLUSION ZONE.** In consultation with the PE, create a buffer zone/ exclusion zone around the find
3. **EXTERNAL NOTIFICATION.** Principal's Representative to notify OEH of previously unidentified species
4. **ASSESS IMPACT**. An assessment is to be undertaken by the Contractor's EM, PE and Principal's Representative 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 measures.
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 amendments to the location or reclassification of threatened species, populations and ecological communities as identified in the updated BAR.
6. **RECOMMENCE WORKS**. Construction works may recommence once the Contractor's EM has:
    a. Obtained approvals as required, and
    b. Confirmed that all corrective actions and additional mitigation measures have been implemented.
7. **UPDATE PLANS AND PROCEDURES**. The Contractor's EM must ensure that the threatened species / ecological community is included in subsequent site plans and/or sensitive area drawings, inductions and Toolbox Talks. The Contractor's EM must provide information to enable an update of ecological monitoring and/ or biodiversity offset requirements

APPENDIX D UNEXPECTED (ONSITE CONTAMINATION) FINDS PROTOCOL

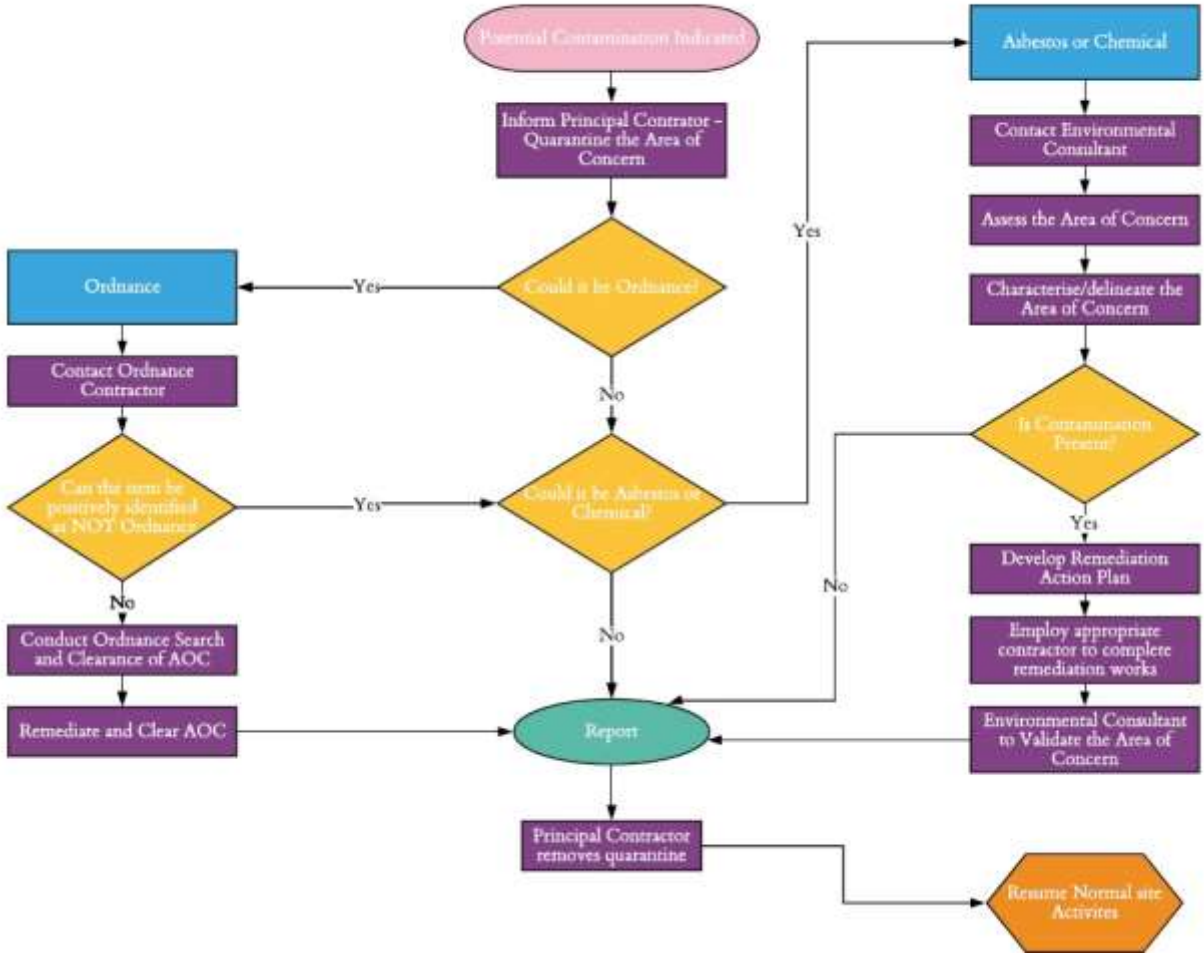
Potential Site Hazards

If you SEE or SMELL anything unusual

STOP WORK & contact Site Foreman

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

Unexpected Finds Protocol (UFP)



APPENDIX E– CONSTRUCTION TRAFFIC AND ACCESS MANAGEMENT PLAN

APPENDIX F – CONSTRUCTION SOIL AND WATER MANAGEMENT PLAN

APPENDIX G – CONSTRUCTION EMERGENCY RESPONSE PLAN

APPENDIX H – CONSTRUCTION AIR QUALITY MANAGEMENT PLAN

APPENDIX I – CONSTRUCTION NOISE AND VIBRATION MANAGEMENT PLAN

APPENDIX J – CONSTRUCTION HERITAGE MANAGEMENT PLAN

APPENDIX K – CONSTRUCTION FLORA AND FAUNA MANAGEMENT PLAN

APPENDIX L – CONTAMINATION MANAGEMENT PLAN

APPENDIX M – ACID SULFATE SOILS MANAGEMENT PLAN

APPENDIX N – COMMUNITY COMMUNICATION STRATEGY

APPENDIX O – CONSTRUCTION DEMOLITION AND WASTE MANAGEMENT PLAN

APPENDIX P – LIGHT SPILL MANAGEMENT

LIGHT SPILL MANAGEMENT

PURPOSE

This Appendix has been developed for the construction period of the Project, to address the Department of the Environment and Energy (DotEE) Approval (EPBC 2011/6086) and forms part of the Construction Environmental Management Plan.

LOCAL CONTEXT

A number of residential suburbs are located in proximity to the Project site. The approximate distances of these suburbs to the MPW Stage 2 site are provided below:

Suburb	Distance to MPW Stage 2 site
Wattle Grove	1000 m to the east
Moorebank	630 m to the north-east
Casula	330 m to the west
Glenfield	820 m to the south-west

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 northwest 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 (currently including companies such as Toyota, Electrolux and BMW warehousing and showroom facilities) located adjacent to the MPW site on the eastern side of Moorebank Avenue to the north of the DJLU site and Anzac Road.

CONSTRUCTION IMPACTS

Lighting would be required during construction of the Project to illuminate within ancillary facilities, and on plant and equipment used for various construction activities.

The MPW Stage 2 EIS states that the impacts of light spill during construction of the Project are expected to be minor as it would be localised and temporary in nature. The majority of construction activities would occur during standard daytime construction hours and would not require lighting. Lighting that would occur during out of hours works would be contained and positioned to avoid light spill to surrounding areas.

The Light Spill Provisional Environmental Management Framework (PEMF) prepared for the MPW EPBC Act approval indicated that some out of hours construction works may be required as part of the construction of the Project. Lighting required to enable these works would have the potential for light spill impacts due to the presence of fixed lighting within the facility and movement of vehicles during night works. However, lighting would be contained to the area of actual works and designed to avoid light spill to surrounding areas as much as possible. No significant effects on fauna are expected during construction of the Project.

MANAGEMENT MEASURES

The following management measures will be implemented during the construction of the Project:

- Temporary lighting (fixed and portable) will be designed, located and directed to minimise the effects of light spill on surrounding sensitive receivers and conservation area (MPW Response to Submission Management and Mitigation Measure 14C)
- Where required for construction works, cut-off and directed lighting would be used and lighting location considered to ensure glare and light spill are minimised (MPW Response to Submission Management and Mitigation Measure 14C and Revised Compilation Mitigation Measure 8A)
- Potentially affected residents and relevant authorities will be notified in advance of any out of hours works (MPW PEMF).

Refer also to the Construction Flora and Fauna Management Plan (Appendix K of this CEMP) regarding management of potential light spill impacts on fauna.

MPW Response to Submission Management and Mitigation Measures 14D to 14H are considered applicable to the design of permanent built infrastructure and will be addressed in the MPW Stage 2 Urban Design and Development Report (UDDR) and operational plans.

MONITORING

Monitoring of light spill impacts will be undertaken by the Contractor's Environment Manager (or delegate) during weekly inspections of construction activities to monitor compliance with the requirements of the approval and this CEMP. Daily (nightly) monitoring will be undertaken during any out of hours works.

Inspections will focus on the following key issue:

- Location and direction of temporary (fixed and portable) lighting.

An Environmental Inspection Checklist will be used to maintain compliance and effectiveness of controls. Items that require action will be documented during environmental inspections and notified to the relevant Site Supervisor. The Site Supervisor will be responsible for providing appropriate resources in terms of labour, plant and equipment to enable the items to be rectified in the nominated timeframes.

Note that additional monitoring referred to in the MPW PEMF applies to the operation phase of the Project and is therefore not references further in this appendix.