STATEMENT OF COMMITMENTS

1 Introduction

The Director-General's Requirements stipulate that the Environmental Assessment must contain:

> *A draft Statement of Commitments, outlining environmental management, mitigation and monitoring measures.*

Following is a Statement of Commitments which describes the management measures which Concrete Recyclers is prepared to implement with regard to the environmental management of the Site, and the mitigation and monitoring of potential environmental impacts associated with the operation of the proposed Materials Recycling Facility.

Concrete Recyclers is committed to the following objectives:

- To provide a long term, fully licensed Materials Recycling Facility capable of recycling waste from the building and construction industry.
- To protect the health of site workers and the general public, and ensure business viability by compliance with relevant legislation, standards and regulating authorities.
- To ensure site operations do not significantly impact on potential environmental receptors and comply with the following environmental legislation:
  - the *Environmental Planning and Assessment Act 1979*, and
  - the *Protection of the Environment Operations Act 1997*.
- To ensure that new technologies are implemented in relation to resource recovery and environmental management of the Materials Recycling Facility throughout its life.
- To encourage and facilitate community participation in the recycling of building and construction waste.
- To protect the surrounding environment through the implementation and management of environmental controls and contingency measures.
- To operate the Materials Recycling Facility in a manner which is sympathetic to the amenity of the area in which it is located.

2 General Commitments

1. The Project will be undertaken in accordance with the Project Application and the Environmental Assessment prepared by Nexus Environmental Planning Pty Ltd, including accompanying appendices, as amended in proceedings before the Land and Environment Court.

2. The Project will be undertaken in accordance with the drawings:

Architectural Drawings - Lyle Marshall & Associates Pty Ltd

Drawing Number	Description
01, Issue B	Indicative Re-graded Landform (Waste Removed From Areas 3 and 4)
02, Issue B	Proposed Site Control Plan
03, Issue B	Proposed Overall Site Plan
04, Issue B	Proposed Detailed Site Plan
05, Issue B	Proposed Site Sections Sheet 1
06, Issue B	Proposed Site Sections Sheet 2
07, Issue B	Office Floor and Weigh Bridges - Plan
08, Issue B	Office Floor and Weigh Bridges - Sections and Elevations
09, Issue B	Staff Lunch Room / Amenities - Plan
10, Issue B	Staff Lunch Room / Amenities - Sections and Elevations
11, Issue B	Wheel Wash Structure - Plan
12, Issue B	Workshop Building - Plan
13, Issue B	Workshop Building - Sections and Elevations
14, Issue B	Primary Crusher Shed - Plan
15, Issue B	Primary Crusher Shed - Sections and Elevations
16, Issue B	Secondary Crusher Shed & Screen Shed 1 - Plan
17, Issue B	Secondary Crusher Shed & Screen Shed 1 - Sections and Elevations
18, Issue B	Screen Shed 2 - Plan
19, Issue B	Screen Shed 2 - Sections and Elevations
20, Issue B	Workshop Shed - Plan
21, Issue B	Workshop Shed - Sections and Elevations

Access Plans - Cardno

Drawing Number	Description
SK 1001, Issue R	Site Plan Sheet 1
SK 1001.1, Issue B	Site Plan Sheet 2
SK 1002, Issue E	Swept Paths Plan
SK 1003, Issue H	Longitudinal Sections
Sk 1004, Issue F	Cross Sections

Acoustic Walls and Mound Plans

Site layout plan prepared by Renzo Tonin & Associates dated 11 August 2016 (Figure 5 in the report of Renzo Tonin dated 17 August 2016).
Marked up Cardno Site Plan entitled "Height and location of ramp acoustic walls" (Figure 8 in the report of Renzo Tonin as revised 18 October 2016).

Landscape Plans - Mim Woodland

Landscape Concept Plan for Moorebank Site, Revision 5
Landscape Concept for Area 7 Panhandle Road, Revision 3
Landscape Plan Section Area 8 Revision 3 with no sight line shown
Landscape Plan Section Area 8 Revision 3 with sight line shown
Landscape Plan Section Area 9 Revision 3
Landscape Concept Area 10, Revision 4

Stormwater Plan

Indicative Arrangement for the Southern Stormwater Sump and Flood Levee Adjacent to the Eastern Leachate Bund (Figure A2 in Addendum Report of Dr Perrens dated 16 September 2016).

3. The Project will be conducted and operated in accordance with this Statement of Commitments.

4. Concrete Recyclers will develop a program of informing the NSW Department of Planning and Infrastructure, the NSW Office of Environment and Heritage, and

Liverpool City Council of construction staging and operation of the Materials Recycling Facility throughout the development process.

5. Concrete Recyclers will obtain the necessary approvals and permits to undertake both construction and operation of the Materials Recycling Facility.

6. A copy of the approved and certified plans, specifications and documents, including conditions of approval will be kept on the Site at all times.

7. All building works will be carried out in accordance with the Building Code of Australia.

3 Environmental Management Plan

An Environmental Management Plan (**EMP**) will be developed for both the construction and operation stages of the Materials Recycling Facility.

The key principles of the EMP will be to provide:

- An environmental management tool for the construction and operation of the proposed Materials Recycling Facility.
- A means of identifying baselines for monitoring the impact of the Materials Recycling Facility.
- An outline of reporting requirements associated with the Materials Recycling Facility.
- The processes for interaction between Concrete Recyclers and the relevant government authorities.
- The means by which compliance with the Environment Protection Licence will be achieved.

The EMP will contain sub-sections which will provide details of the management of the Materials Recycling Facility to minimise potential impacts. Sub-sections of the EMP will include:

- Induction and Training.
- An Erosion and Sediment Control Plan which will cover both establishment and operation of the Materials Recycling Facility.
- A Construction and Operational Noise Management Plan which will detail measures to minimise acoustic impact during establishment and operation.

- An Air Quality Management Plan which will detail measures to be employed to minimise air quality impacts during both establishment and operation.
- A Waste Management Plan.
- A Stormwater Management Plan.
- A Traffic Management Plan.
- A Bushfire Control Plan
- A Complaints Management Plan.
- Hazard Reduction.

Following are drafts of the relevant sections of the EMP, refinement of which will be undertaken following receipt of approval for the proposed development.

TITLE	EMP 1 - INDUCTION AND TRAINING
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To ensure all persons working on the site are aware of their environmental obligations, site environmental issues and control measures, as well as roles and responsibilities.
Procedures	1. Environmental induction for all employees and contractors before starting work. Induction to cover the following issues: (i) requirements of the EMP; (ii) specific environmental issues on the site and control measures; (iii) roles and responsibilities for environmental management, and (iv) environmental incident procedures. 2. Retraining sessions within one month of changes to relevant sections of the EMP. 3. Retraining sessions within one month to persons identified by *Complaints Register* as not conforming to procedures. 4. All truck drivers entering the site for the first time to be provided with the *Site Induction for Drivers* form.
Monitoring	Status of inductions to be checked monthly.
Reporting	Record of all inductions and retraining, including name and date provided, to be retained on site.
Responsible Person	Environmental Officer responsible for ensuring all persons working on the site are properly inducted and retraining provided as required.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 2 - EROSION AND SEDIMENT CONTROL
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To minimise and manage erosion and sedimentation on the site and ensure that sediment laden runoff is not discharged from the site.
Procedures	1. Construct all internal access tracks as per the approval. 2. Divert runoff to sediment basins, sediment traps and catch ponds as a primary means of sediment trapping before water is discharged to main tank storage. 3. Inspect drainage and sediment controls monthly and conduct maintenance as required to ensure effectiveness. Where erosion is observed to be occurring, implement rehabilitation/stabilisation measures. 4. Implement and maintain silt fence. Fence to be maintained along boundary.
Monitoring	Monthly inspection of all drainage and sediment controls on site, including water storage, pumps and pipes.
Reporting	As required by Conditions/Licence.
Responsible Person	Environmental Officer or person(s) authorised by Environmental Officer.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 3 - NOISE MANAGEMENT PLAN
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To ensure that construction and operation noise complies with EPA regulations. To minimise impact of noise on surrounding residents. To ensure employees are not subject to noise levels above those specified in the OH&S legislation.
Procedures	1. Consult with the industrial facility on the northern boundary in relation to higher noise levels near the boundary during the establishment phase of the development. 2. Implement acoustic mitigation measures as per relevant conditions of the approval. 3. Take all reasonable steps to obtain an Environment Protection Licence from the Environment Protection Authority containing the noise limits in Condition C11 of the draft conditions in Land and Environment Court proceedings 20216/159652 and 2016/157848, as agreed by Dr Renzo Tonin. 4. Minimise works near the northern boundary of the site wherever feasible. 5. Standard construction work hours will be as follows: • Monday to Friday 7:00am to 6:00pm. • Saturday 8:00am to 1:00pm. • No work on Sundays or public holiday. 6. Ensure mobile plant used is fitted with residential grade silencers. 7. At all times, but particularly prior to 7:00am, trucks should be loaded in a quiet manner by placing rather than dropping material into trucks. 8. Plant based at the site must incorporate "quacker" style reversing alarms. 9. Trucks with traditional "beep beep" alarms will not reverse on the site prior to 7:00am. 10. Moorebank Recyclers will manage its hourly / daily truck movements to remain within the intrusiveness criteria at all residences.
Monitoring	As required by Conditions/Licence.
Reporting	As required by Conditions/Licence.
Responsible Person	Environmental Officer to organise monitoring and reporting as required. Truck drivers responsible for required actions to reduce noise.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 4 - AIR QUALITY MANAGEMENT PLAN
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To minimise dust generation and air pollution. To prevent impact to surrounding residences and comply with the approved ambient goals. To ensure employees are not subject to dust levels above those specified in the OH&S legislation.
Procedures	A proactive and reactive air quality management plan (AQMP) would be developed and implemented in accordance with Department of Planning and Infrastructure and NSW EPA requirements. The AQMP will detail the following: • The dust emission controls to be applied on site. • Dust monitoring to be undertaken. • Wind speed and wind direction triggers with associated mitigation measures to be implemented during adverse weather conditions. Dust emission controls which would be applied to operations at the site. In summary, the following controls would be used: • Delivery trucks entering and leaving site on sealed access road: - Tar sealed - Regular water application - Sweeping • Delivery trucks entering and leaving site on unsealed internal roads: - Cement stabilised road base - Regular water application to road surface • Vehicles unloading to tipping zone stockpiles: - Water sprays/fog canon • Primary crushing: - Wet suppression and indoors • Secondary crushing: - Wet suppression and indoors • Screening: - Wet suppression and indoors • Loading to product stockpiles from conveyors: - Water sprays • Loading from product stockpiles to trucks: - Material already high moisture content from processing/water sprays as required

	• Product trucks on paved surfaces entering/leaving site: - Tar sealed - Regular water application - Sweeping • Product trucks on unpaved surfaces entering/leaving site: - Cement stabilised road base - Regular water application to road surface • Wind erosion from tipping stockpiles: - Water sprays/surface crusting • Wind erosion from product stockpiles: - Water sprays/surface crusting • Wind erosion from open areas: - Water sprays/surface crusting • Maintain dust suppression devices to all processing equipment. • Maintain the sprinkler system including fine sprays on the conveyors of the processing plant and stockpile sprinklers. • 20 km/hr speed limit on internal, unsealed access tracks to minimise dust generation. • All loaded vehicles entering and leaving the site to be covered. • Regular maintenance of mobile and fixed equipment to minimise exhaust emissions. Asbestos Management Asbestos management would be undertaken in accordance with Workcover NSW guide *Management of asbestos in recycled construction and demolition waste*. In addition, Concrete Recyclers will: • advise suppliers that asbestos and asbestos-containing material will not be accepted. • incorporate a 'no asbestos' clause in contracts. • install highly visible signs indicating that NO ASBESTOS in C&D waste will be accepted. • ensures that workers who receive and inspect C&D materials are trained and provided with suitable equipment to complete their tasks. • have a site safety plan which documents a safe system of work. Stockpile Management

	Dust emissions from the stockpiles will be managed as summarised below: • All aggregates will be kept damp. • Uncrushed brick and concrete and sandstone: - Water sprays/foggers will be applied to the material as each load tips to the uncrushed/brick rubble/concrete rubble stockpiles. - Additional water will be sprayed over the stockpiles, a surface crust then forms which prevents dust emissions due to wind erosion. - Water sprays will be used when loading from the stockpiles to the primary crusher. • Crushed road base (product): - The material will be moist when it exits the crusher and is loaded to the product stockpiles. - Due to the inherent moisture of the material, a surface crust then forms which prevents dust emissions due to wind erosion. - Irrigation-type water sprays/foggers will be used during the load-out process. The facility would only receive non-putrescible waste materials. Putrescible waste can be defined as organic material which is capable of being decomposed which often leads to the release of an offensive odour. Non-putrescible material is material which cannot be decomposed by microorganisms and, hence, would not generate this odour. The type of non-putrescible material likely to be received on-site may include concrete, bricks, asphalt, sandstone and sand from the building and construction industry. All loads would be inspected prior to entering the Site and if any putrescible waste is found, the load would be rejected.
Monitoring	As required by Conditions/Licence. It is envisaged that the monitoring would include the following: • On-site meteorological station. • Real-time monitoring of PM_{10} concentrations air quality in the vicinity of the residences predicted to be most impacted by the operations. An additional monitor would also be located to the south of the site. Analysis of the data from these two monitoring locations, in combination with meteorological data, will enable the Project contribution to measured concentrations to be determined. It is proposed that the real-time monitoring would be completed for a limited period of time to demonstrate that the Project is not adversely impacting the local air quality.
Reporting	As required by Conditions/Licence.
Responsible Person	1. Drivers responsible for adherence to speed limits, covering loads, regular vehicle maintenance. 2. Site supervisor responsible for ensuring processing plant operator(s) maintain dust suppression equipment on the plant. 3. Environmental Officer or person(s) authorised by Environmental Officer responsible for dust and air quality monitoring and reporting,

	implementation of dust suppression controls.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 5 - WASTE MANAGEMENT PLAN
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To minimise waste generated, maximise reuse and recycling, and ensure wastes are managed effectively to minimise impact on the environment.
Procedures	1. Maintain separate receptacles for paper, aluminium, glass, plastic and general domestic waste. 2. Recyclables (paper, aluminium, glass and plastic) to be collected and taken to a recycling depot. 3. Non-recyclable waste to be disposed of at registered landfill. 4. No putrescible material to be disposed of on site. 5. No waste generated outside site to be stored, treated, processed, or disposed on site except as permitted by a licence. 6. Maintain on-site sewage storage facility. 7. Encouragement of employees to adopt waste-reducing practices. 8. Apart from visual inspections of waste as it arrives at the site, it is a requirement of the EPA that all material leaving the site complies with the POEO (Waste) Regulation 2005 - General Exemption Under Part 6, Clause 51 and 51A *"The Recovered Aggregate Exemption 2010"* or *"The Excavated Natural Material Exemption 2008"*. These exemptions detail both the processes which must be adhered to and the chemical testing program required to allow the material leaving the site to be applied to land. These exemptions are to be utilised and complied with as part of the operation of the facility.
Monitoring	Monthly inspection of on-site sorting and storage of recyclables.
Reporting	As required by Conditions/Licence.
Responsible Person	All staff are responsible for correct management and disposal of waste. Environmental Officer to educate new staff of waste minimisation procedures.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 6 - STORMWATER MANAGEMENT PLAN
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To ensure discharge of stormwater from the site is clear of sediment, downstream ecosystems are protected, on-site re-use of water is maximised.
Procedures	1. Install and maintain water management structures. 2. Erosion and sediment control works to be implemented in accordance with EMP 2. 3. Minimise the area of disturbance. 4. Install tank farm to store stormwater collected on the site for re-use in dust mitigation. 5. Testing of stormwater discharge after completion of the site preparation to confirm that the pH is within acceptable limits.
Monitoring	As required by Conditions/Licence.
Reporting	As required by Conditions/Licence.
Responsible Person	Environmental Officer or person(s) authorised by Environmental Officer.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 7 - TRAFFIC MANAGEMENT PLAN
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To minimise the impact of trucks on the local road network and local residents, and to comply with approved access and vehicle movements.
Procedures	1. All new truck drivers to be provided with *Site Induction for Drivers* form at the site entrance. 2. Drivers provided with Site Traffic Management Policy. 3. All loads must be fully covered prior to leaving the site. 4. 20 km/hr speed limit on internal road. 5. All vehicles are to enter and leave the site in a forward direction.
Monitoring	1. All loads to be inspected at site entrance to make sure they are covered. 2. Complaints register to be used to record traffic management complaints.
Reporting	As required by Conditions/Licence.
Responsible Person	1. Environmental Officer responsible for weekly inspections of site entrance for sand/clay accumulation, monthly inspections of road pavements for damage condition. 2. Truck drivers responsible to comply with permitted hours of operation.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 8 - BUSHFIRE CONTROL
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To: • afford occupants of any building adequate protection from exposure to a bush fire; • provide for a defendable space to be located around buildings; • provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent direct flame contact and material ignition; • ensure that safe operational access and egress for emergency service personnel and residents is available; • provide for ongoing management and maintenance of bush fire protection measures, including fuel loads in the asset protection zone (APZ); and • ensure that utility services are adequate to meet the needs of firefighters (and others assisting in bush fire fighting).
Procedures	The following measures will be employed for bushfire fighting purposes: 1. Water storage tanks will be provided as per the approved plans. 2. Where an on-site water supply is provided, a suitable connection for firefighting purposes will be made available and located within the inner protection area (IPA) and away from the building. An Rural Fire Service standard 65mm metal Storz outlet with a gate or ball valve will be provided. The gate or ball valve, pipes and tank penetration are adequate for full 50mm inner diameter water flow through the Storz fitting and are metal rather than plastic. 3. Exposed, above ground tanks will be manufactured of concrete or metal and raised tanks will have their stands protected. 4. A Pump will be provided to supply water for fire suppression activities and be a minimum 5hp or 3kW (petrol or diesel powered). 5. Pumps for the water tank will be adequately shielded from potential bush fire threat. 6. All above ground water and gas service pipes/outlets/fittings external to the building will be metal, including and up to any taps. 7. Electrical transmission lines will be located underground. 8. Overhead electrical transmission lines will be installed with short pole spacing (30 metres), unless crossing gullies, gorges or riparian areas; and

	no part of a tree is to be closer to a power line than the distance set out in accordance with the specifications in 'Vegetation Safety Clearances' issued by Energy Australia. 9. Reticulated or bottled gas will be installed and maintained in accordance with Australian Standard AS/NZS 1596:2002: 'The storage and handling of LP gas' and the requirements of relevant authorities. Gas cylinders kept close to the building shall have release valves directed away from the building and be located at least 2 metres away from any combustible material. Connections to and from gas cylinders are to be metal. 10. At the commencement of building works and in perpetuity the property around the proposed buildings to a distance of 25 metres or to the boundary where insufficient, will be maintained as an inner protection area as outlined in Section 4.1.3 of Appendix 5 of *Planning for Bush Fire Protection 2006* and the NSW Rural Fire Service's document *Standards for asset protection zones*. 11. Water, electricity and gas supplies will to comply with sections 4.1.3 of *Planning for Bush Fire Protection 2006*. 12. The proposed building would be protected from ember attack by enclosing all openings (excluding roof tile spaces) or covering openings with a non-corrosive metal screen. Where applicable this includes sub floor area, openable windows, doors, vents, weepholes and eaves.
Monitoring	Status of bushfire fighting equipment to be checked monthly.
Reporting	Record of all incidents of bushfire.
Responsible Person	Environmental Officer responsible for ensuring all persons working on the site are properly inducted and retraining provided as required.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 9 - COMPLAINTS MANAGEMENT
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To ensure any site problems brought to the attention of Concrete Recyclers by the local community and/or relevant authorities are documented and acted upon to avoid re-occurrence.
Procedures	1. Complaints telephone number signposted at front gate. Telephone number, along with postal and email address for complaints advertised on website. 2. All complaints/concerns raised by local community/relevant authorities to be recorded on *Complaints Register* by Environmental Officer. *Complaints register* to be retained on site. 3. All complaints to be bought to the attention of the Environmental Officer immediately. 4. Environmental Officer to identify and initiate appropriate action in response to complaint and follow-up contact with complainant. 5. Any complaints received to be reviewed to ascertain if site management requires amendment.
Monitoring	1. All complaints to be recorded on *Complaints Register*. 2. *Complaints Register* to be checked monthly.
Reporting	Summary of complaints to the EPA as part of Annual Return for Licence.
Responsible Person	1. All persons who receive telephone complaints are responsible for completing the *Complaints Register* and notifying the Environmental Officer within 24 hours. 2. Environmental Officer responsible for initiating follow-up action and contact with complainant.
Information/References	Insert relevant EMPs and Policies.

TITLE	EMP 10 - HAZARD REDUCTION
Approval/Licence Ref.	Insert relevant Conditions of Approval. Insert relevant POEO Licence Conditions.
Objectives	To ensure any potential hazards are mitigated.
Procedures	1. Spill kits in the storage shed and adjacent to the diesel fuel tanks will be installed. 2. Staff will be trained in spill cleanup procedures and use of the spill kits at the Site. 3. A dry powder fire extinguisher will be installed in the shed and adjacent to the diesel fuel tanks. 4. Staff at the Site will be trained in the use of first attack fire fighting. 5. A procedure for the refuelling of mobile plant will be developed and refuelling operations will be performed no closer than 12 metres to the Site boundary. 6. Operational plant will be located no closer than 25 metres to the Site boundary.
Monitoring	1. All incidents will be recorded detailing measures taken to mitigate impact. 2. Spill kits and firefighting equipment to be checked monthly.
Reporting	Summary of incidents to the EPA as part of Annual Return for Licence.
Responsible Person	1. Environmental Officer responsible for initiating follow-up action and monitoring of equipment.
Information/References	Insert relevant EMPs and Policies.

4 Monitoring and Reporting

During both the construction and operational stages of the development, environmental reporting is essential to ensure that the facility operates within the parameters set down in both the approval for the development and the relevant legislation and licences which guide the operation of the facility.

Reporting will include details of:

- The parties who are responsible for the on-site Management Plan at the Site.
- The methods of communication with regard to matters contained in the EMP.

- Contact details of those responsible for the operation of the EMP.
- Compliance reports.
- Remedial action taken as a result of the reporting on an incident.
- Details of auditing carried on in compliance of approval and licence conditions.
- Details of any monitoring such as air quality, acoustic monitoring and groundwater monitoring.