

BUSHFIRE MANAGEMENT STRATEGY

Moorebank Precinct East Stage 1, Package 2

07 JULY 2021

SYDNEY INTERMODAL TERMINAL ALLIANCE

Moorebank Precinct East, Stage 1, Package 2

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REVISIONS

Revision	Date	Description	Prepared by	Approved by
001	28/02/17	First revision for internal review		
002	28/02/17	Updated based on comments for submission		
003	26/10/2017	Revision of Construction footprint		
004	18/09/2018	Revised EDO Conditions of Consent. Revisions associated with the internal environmental and sustainability audit & RfMA 003 – 005 & 008		
005	11/01/2019	Minor updates associated with 'non-conformance,' 'non-compliance' and 'corrective and preventative actions'		
006	9/07/2019	Revisions associated with RfMA 011		

Revision	Date	Description	Prepared by	Approved by
007	07/07/2021	Revision associated with Disused Rail Spur removal	■	■

ACRONYMS AND DEFINITIONS

Term	Definition
AHD	Australian Height Datum
ARI	Average Rainfall Intensity
BMS	Bushfire Management Strategy
CEMP	Construction Environmental Management Plan
CERP	Construction Emergency Response Plan
CoC	Conditions of Consent
CSWMP	Construction Soil and Water Management Plan
CTAMP	Construction Traffic and Access Management Plan
DECC	Department of Energy and Climate Change
DPE	Department of Planning and Environment
DURS	Disused Rail Spur
EDO	Environmental Defenders Office
EMP	Environmental Management Plan
EMS	Environmental Management Systems
EPA	Environment Protection Authority
FERP	Flood Emergency Response Plan
HAZID	Hazardous Substances Identification
HSE	Health Safety and Environment
IMEX	<p>Import Export Terminal. Includes the following key components:</p> <ul style="list-style-type: none"> • Truck processing, holding and loading areas - entrance and exit from Moorebank Avenue • Rail loading and container storage areas – installation of four rail sidings with adjacent container storage area serviced by manual handling equipment initially and overhead gantry cranes progressively • Administration facility and associated car parking- light vehicle access from Moorebank Avenue.
IMT facility	<p>MPE Stage 1 Site including the construction of the following key components together comprising the intermodal terminal (IMT):</p> <ul style="list-style-type: none"> • Truck processing and loading areas. • Rail loading and container storage areas. • Administration facility and associated car parking • Rail Link.

Term	Definition
ISO	International Organisation for Standardisation
ITP	Inspection and Test Plan
JSEA	Job Safety and Environmental Analysis
L&EC	Land and Environment Court
Non-compliance	An occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with Development Consent SSD 6766 Conditions of Consent or EPBC Act Approval (EPBC 2011/6229) Conditions of Approval but is not an incident
Non-conformance	Non-conformances are observations or actions that are not in strict accordance with the CEMP and the aspect specific sub-plan.
SDS	Safety Data Sheet
SSD	State Significant Development
SCRIM	SIMTA Incident Management Reporting System
SHEMS	SIMTA Environmental Management System
SIMTA	Sydney Intermodal Terminal Alliance
SWMS	Safe Works Method Statement

COMPLIANCE MATRICES

Table 1 Final Compilation of Mitigation Measures (FCMM)

FCMM	Requirement	Document Reference
14A	A bushfire management strategy, or equivalent, will be prepared as part of the CEMP for the construction phase. The strategy will include:	This Document
	<ul style="list-style-type: none"> Emergency response plans and procedures 	
	<ul style="list-style-type: none"> Restrictions on activities (namely hot works) that cannot be undertaken on total fire ban days within areas of high Bushfire Hazard Rating, unless otherwise advised by the NSW Rural Fire Service. 	Table 4 BM8 and BM9 Section 6.1.1
	<ul style="list-style-type: none"> All construction site offices and temporary buildings will be located outside buffer areas to ensure minimum setbacks of 10m. 	Table 4 BM13
	<ul style="list-style-type: none"> All construction site offices will be accessible via access roads suitable for firefighting appliances similar to NSW Rural Fire Service Category 1 tankers. 	Table 4 BM10

Table 2 Revised Statement of Commitments

RSoC	Requirement	Document Reference
1.65	Bushfire Management	Table 4
	<p>a) The Proponent commits to incorporating the key objectives identified by the Rural Fire Service (RFS) into relevant future design stages, in accordance with the following principles:</p> <ul style="list-style-type: none"> Afford occupants of any building adequate protection from exposure to a bush fire Ensure safe operational access and egress for emergency service personnel and residents. Provide for ongoing management and maintenance of bush fire protection measures, including fuel loads in asset protection zones (APZs) Ensure that utility services are adequate to meet the needs of fire fighters 	
	<p>b) The Proponent commits to the development of a Bushfire Management Plan for both the construction and operational phases of the Principal proposal that aligns with the requirements of the local RFS Bushfire Management Committee operational plans of management.</p>	This Document

Table 3 Commonwealth Mitigation Measures

Cth MM	Requirement	Document Reference
Biodiversity	Vehicles and plant should not block fire trails.	This Document

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1 INTRODUCTION

The Sydney Intermodal Terminal Alliance (SIMTA) received approval for the construction and operation of Stage 1 of the Moorebank Precinct East (MPE) Project, comprising an Intermodal (IMT) Facility including a rail link (Package 1) and Import Export (IMEX) Terminal (Package 2) on 12 December 2016 (SSD 6766). The construction and operation of the associated rail link was subject to an appeal in September 2017 (Appeal Number 2017/00081889). The approval was upheld and the revised Conditions of Consent (CoC) were released on 13 March 2018.

This strategy has been established to demonstrate the contractor's approach to bushfire management.

This Bushfire Management Strategy (BMS) addresses the relevant requirements of the Project Approvals, including the EIS, Submissions Report and Minister's Conditions of Consent (CoC), and all applicable guidelines and standards specific to the management of bushfire during construction of the Project

1.1 Background and Scope

The MPE Project site is located approximately 27 kilometres (km) south-west of the Sydney Central Business District (CBD) and approximately 26 km west of Port Botany and includes the former Defence National Storage and Distribution Centre (DNSDC) site.

The MPE Project involves the development of an intermodal facility, including warehouse and distribution facilities, rail link, freight village (ancillary site and operational services), stormwater, landscaping, servicing and associated works on the eastern side of Moorebank Avenue, Moorebank. It is to be developed in three key stages:

Stage 1 - Construction of the IMT

Stage 2 - Construction of warehouse and distribution facilities

Stage 3 - Extension of the IMT and completion of warehouse and distribution facilities.

Stage 1 of the MPE Project comprises, and will be constructed across, two packages:

- Package 1: The Rail Link (not included within this BMS) includes a connection to the IMEX, and traverses across Moorebank Avenue, Anzac Creek and Georges River prior to connecting to the Southern Sydney Freight Line (SSFL) (refer to Figure 1).
- Package 2: The IMEX (subject of this BMS) includes the following key components:
 - Truck processing, holding and loading areas - entrance and exit from Moorebank Avenue
 - Rail loading and container storage areas – installation of four rail sidings with adjacent container storage area serviced by manual handling equipment initially and overhead gantry cranes progressively
 - Administration facility and associated car parking- light vehicle access from Moorebank Avenue.
- Removal of the Disused Rail Spur (DURS) and rehabilitation of the land containing the DURS as required by CoC C23B of the MPE Stage 1 Consent (as amended by the court decision on 13 March 2018).

The layout of the IMEX generally comprises operational areas, an administration area, rail sidings, utilities and drainage infrastructure, landscaping and signage. The operational areas of the IMEX consists of the primary and secondary container loading / unloading areas and container storage areas, and the truck holding area. Within these areas containers will be stacked up to five high.

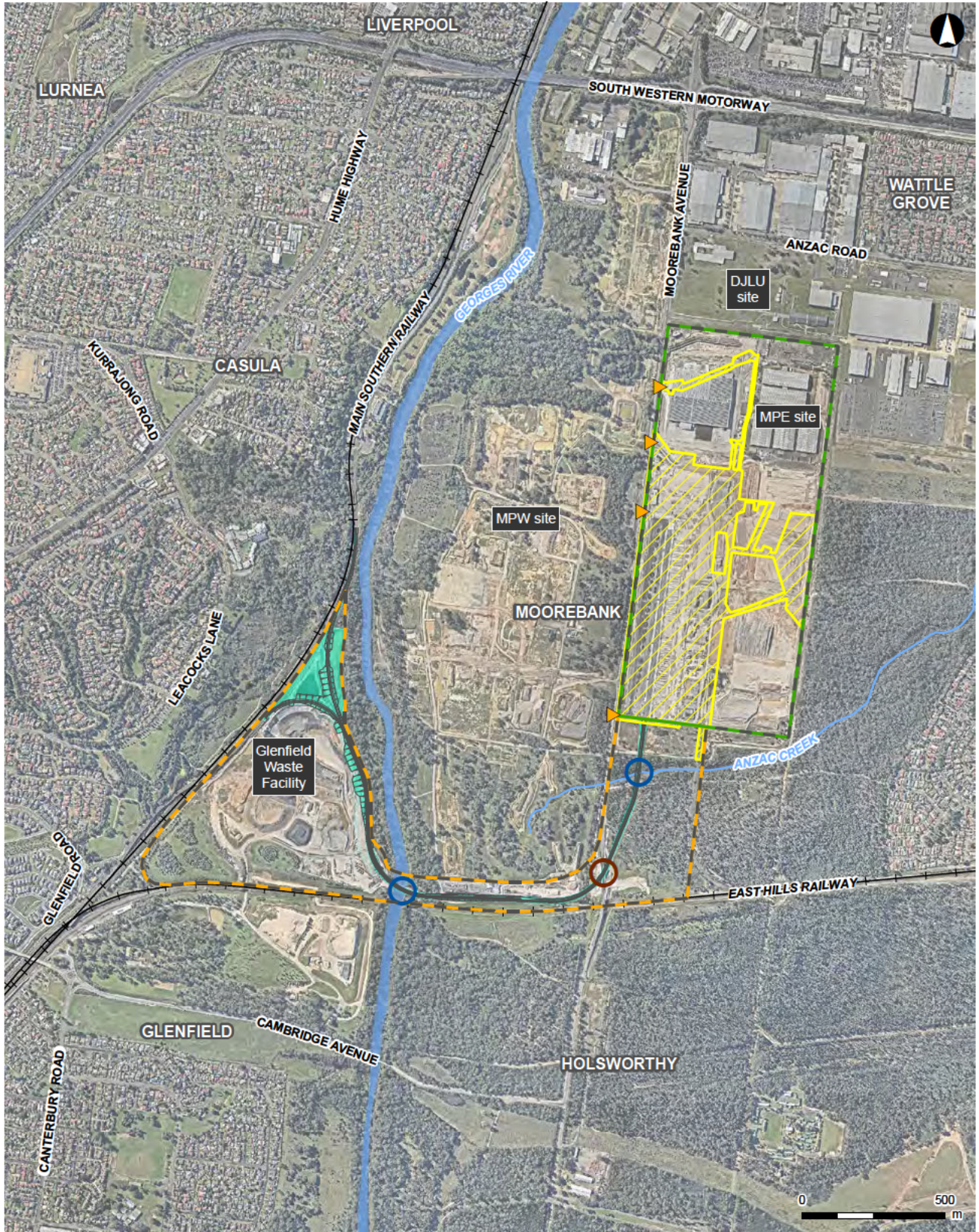
1.1.1 Removal of Disused Rail Spur

As a result of the NSW Land and Environment Court Order of 13 March 2018, the MPE Stage 1 Consent was amended to include the removal of the DURS as CoC 23B. The DURS removal works involve the removal of the DURS and associated infrastructure, followed by the remediation and













rehabilitation of the DURS footprint. Remediation of the site will be covered by the existing “Boot Land” Environmental Management Plan (EMP) prepared by GHD and dated May 2016. This EMP includes procedures for managing unexpected finds, water and sediment monitoring, reporting and record keeping.

Management measures in this BMS are considered appropriate to manage the DURS construction activities.

MPE Stage 1 CEMP



LEGEND

-  Project site
-  Construction footprint
-  MPE site
-  Rail corridor
-  MPE Stage 1 Package 1 (Rail Link)
-  Construction access
-  DURS Laydown/ Stockpile Area
-  Creek/river crossing
-  Road crossing
-  Rail link
-  Existing railway
-  Watercourse

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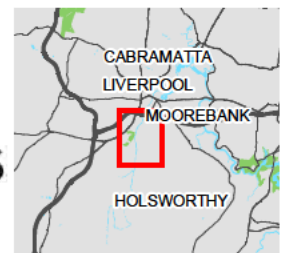


Figure 1: MPE Site Overview

1.1.2 Environmental Planning Approval

The MPE Stage 1 Project has been assessed by the Department of Planning and Environment (DP&E) under Division 4.7 (Division 4.1 prior to March 2018) of the Environmental Planning and Assessment Act 1979 (EP&A Act) as State Significant Development (SSD). The Planning Assessment Commission (PAC) granted Approval for the MPE Stage 1 Project on 12 December 2016 and is subject to the Minister’s Conditions of Consent (CoC, 18 December 2016 (ref SSD-6766)). The MPE Stage 1 Project, its impacts, consultation and mitigation were documented in the following suite of documents:

- State Significant Development Application SSD 6766 (as amended in the Land and Environment Court 13 March 2018)
- SIMTA Intermodal Terminal Facility – Stage 1 – Environmental Impact Statement (Hyder Consulting Pty Ltd, May 2014)
- SIMTA Intermodal Terminal Facility – Stage 1 – Response to Submissions (Hyder Consulting Pty Ltd, September 2015)
- Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) Approval (No. 2011/6229) granted on March 2014.

This IMEX Bushfire Management Strategy (BMS) has been prepared to address:

- Condition 14A (Final Compilation of Mitigation Measures (FCMM)) – A bushfire management strategy, or equivalent, will be prepared as part of the CEMP for the construction phase.

1.2 Purpose and Application

The purpose of this BMS is to provide key information pertaining to the bushfire hazard during the construction phase of IMEX, provide a strategic assessment of bushfire risk, identify priority areas of risk and outline coordinated, proactive processes in the management and prevention of this risk.

By implementing the various components of the Project environmental management system (EMS) such as the Construction Emergency Response Plan (CERP), bushfire risk will be mitigated in line with the Project approval conditions and directives.

1.3 Objectives and Targets

The following high level objectives and targets are set for the Project for bushfire management:

Table 4 Bushfire Objectives and Targets

Objectives	Performance Indicators
<ul style="list-style-type: none"> • Minimise adverse impacts or adverse environmental consequences of bushfire • Mitigate on-site landscaping contributing to precinct bushfire via installation of appropriate flora species and management devices (as per approved Landscape Plan) 	<ul style="list-style-type: none"> • No death or injury to personnel during bushfire event • No avoidable contribution to fire via landscaping fuel loads during bushfire event

1.4 Context of the Report

This BMS is site specific pertaining to construction of MPE Stage 1 Package 2 (IMEX Terminal), and should be read in conjunction with the final and approved Contractor's Emergency Response Plan (CERP) to be developed and approved prior to commencement, and other related studies including Appendix W of the MPE Stage 1 Environmental Impact Statement.

It should be noted that the final approved CERP will prescribe all emergency response procedures, based on hazards and risk identified within the Risk Assessment (Contractor), and where any conflict or confusion arises with this BMS, the Construction Emergency Response Plan (CERP) shall apply. This BMS will be revised and updated immediately upon completion of the CERP to ensure compliance and conformance with overall emergency response management.

1.5 Interface with other Plans & Requirements

This BMS is to be read in conjunction with the Construction Emergency Response Plan, Construction Project Management Plan, Construction Environmental Management Plan, Urban Design Landscape Plan and the Construction Health & Safety Management Plan.

1.6 Access

Access to the Project would be to and from Moorebank Avenue, as detailed within the Construction Traffic and Access Management Plan, and Environmental Control Plan(s) (Appendix Q of the CEMP).

The main construction compound will be accessed and egressed directly to and from Moorebank Avenue via internal haul roads through the Project site. The compound will utilise the existing main central entrance (from Moorebank Avenue) and transition to use of the proposed main entrance (from Moorebank Avenue) once this has been constructed. An emergency access point has been nominated to the south of the site (figure 3). All construction site offices will be accessible via these access roads which will be suitable for firefighting appliances such as NSW Rural Fire Service category 1 tankers.

2 ENVIRONMENTAL OBLIGATIONS

Table 1 details project condition requirements related to bushfire. A full legislation register is provided in Appendix M of the CEMP.

The following outlines relevant legislation and guidelines applicable to bushfire management on this project which have been considered in the development of this strategy:

- *Environmental Planning and Assessment Act 1979*
 - Section 79C(1)
 - Section 79BA
- *Rural Fires Act 1997*
- Liverpool Local Environmental Plan 2008
- Planning for Bush Fire Protection (PBP) – NSW RFS 2006
- Australian Standards AS3959-2009 – Construction in Bushfire Prone Areas

3 EXISTING ENVIRONMENT

The Project has been assessed in the EIS as having a low bushfire risk, having been designed to ensure compliance with Planning for Bushfire Protection (PBP). However, bushfire risk is most likely to arise from the large area of native vegetation contained on the Commonwealth land adjoining the Project to the east and south. This vegetation is mapped as 'Vegetation Category 1' bushfire prone land (Liverpool City Council 2014).

MPE Stage 1 BMS

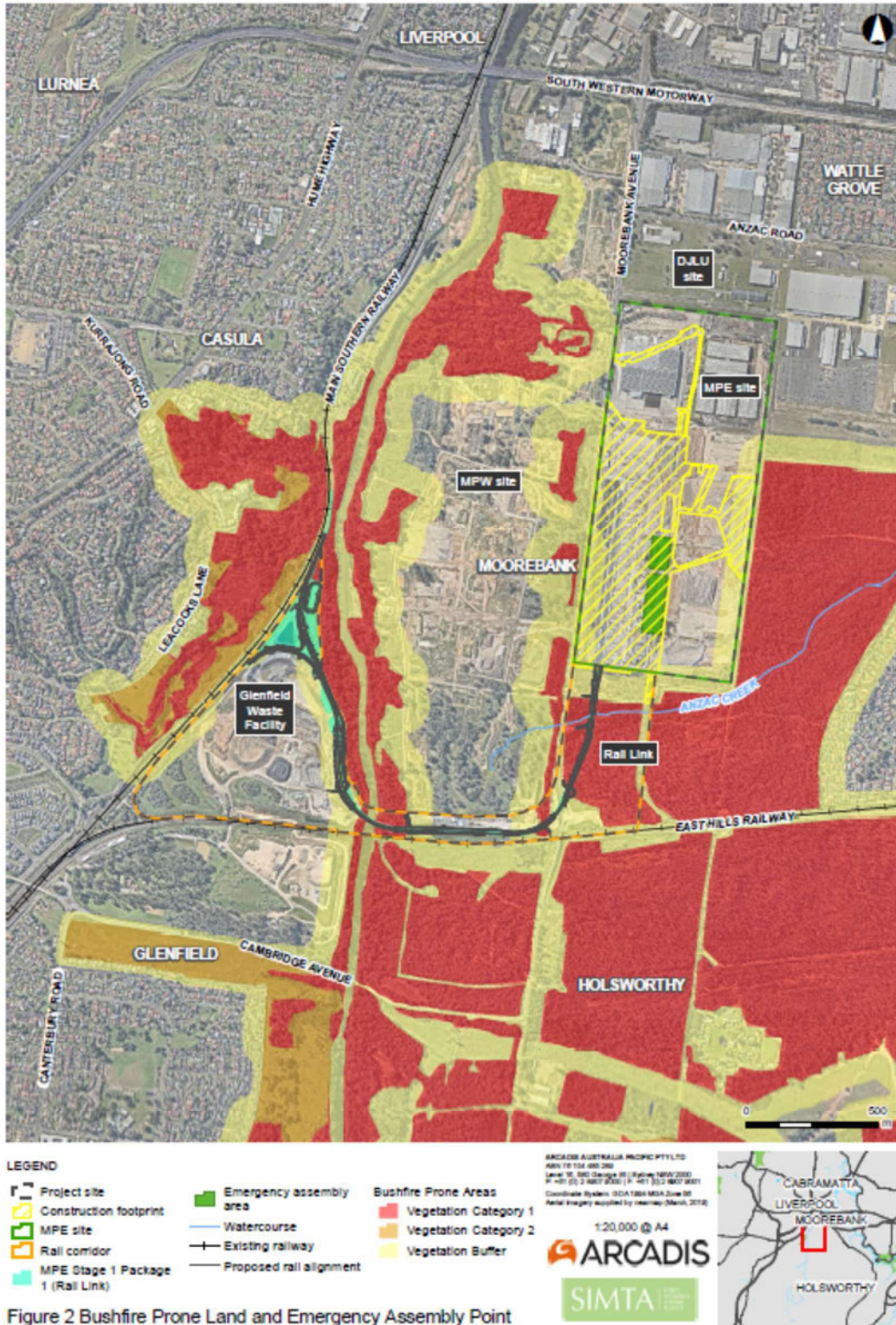


Figure 2 Bushfire Prone Land Map and Emergency Assembly Point

4 ASPECTS AND IMPACTS

Both on-site and off-site sources which have the potential to ignite a bushfire. The bushfire may result in significant social, economic and ecological impacts on the Project and surrounding environment.

External sources of ignition include:

- Deliberate burning of bushland
- Car dumping
- Discarded cigarette butts
- Illegal burning
- Lightning strike

Activities associated with undertaking the Project may have the potential to cause ignition of bushfires as detailed below:

- Hot works
- Vehicle exhaust
- Idling of vehicles on vegetated areas
- Sparks or flame sources such as grinders and welders
- Stockpiles of vegetation such as mulch
- Site staff discarded cigarette butts.

The impacts of the above include:

- Damage to site facilities, property and equipment
- Increased risk of safety to site staff, local residents and businesses and the environment
- Damage/destruction of threatened species

5 MITIGATION MEASURES

The Project is more likely to be at risk from bushfire rather than representing a potential ignition source for a bushfire. Fire management or prevention practices include activities that land owners and communities implement to prepare for, and respond to, bushfire events. These include fire control line construction and maintenance, fuel reduction through burning or clearing (slashing, mowing etc.) and having the resources and equipment available to fight fires. The risk of fire is increased if these prevention and preparation activities are incomplete. To keep risks associated with bushfire impact to a low level the following items will be actioned prior to, and during construction:

- Management strategies will be adopted to maintain low availability of ground fuel around all site boundaries and within the Asset Protection Zone.
- Maintenance of weeds and potential fuel sources will be undertaken
- Consultation with the Rural Fire Service will be maintained to facilitate hazard reduction activities in proximity to the Project
- Bushfire response strategies will be included within the contractors Emergency Response Plan for the Project

This is further discussed below (Table 5).

Table 5 Bushfire Management Measures

Item	Management Measure	Timing	Responsibility	Reference
Monitoring and Training				
BM1	The contractor will sign up to NSW RFS alerts or similar. BOM and Liverpool Council alerts will also be monitored	Daily during construction	Supervisor	PBP 2006
BM2	All staff will be required to undergo a site induction which will outline the requirements of fire safety	Construction	Safety Coordinator	PBP 2006
BM3	Weather conditions will be monitored daily	Daily during construction	Supervisor	PBP 2006
Plant and Equipment				
BM4	Firefighting equipment will be made available at designated locations in site offices and within site vehicles. These will be well maintained in accordance with AS1851:2012	Construction	Supervisor Safety Coordinator	PBP 2006
BM5	Plant and equipment will be fitted with appropriate guards to minimise potential for sparks causing accidental ignition.	Construction	Supervisor	PBP 2006
BM6	Water trucks will be available on site at all times	Construction	Supervisor	PBP 2006
BM6	Hazardous materials transport, containment and storage will comply with the relevant regulations of the Dangerous Goods Safety Act 2004. All hazardous materials will be stored in accordance with the relevant Australian Standards in designated areas	Construction	Supervisor	PBP 2006

Item	Management Measure	Timing	Responsibility	Reference
Construction				
BM7	No vehicles will be permitted to idle whilst on vegetation to minimise risk of ignition from heat sources	Construction	Supervisor	PBP 2006
BM8	No hot works permitted during total fire bans	Construction	Supervisor	PBP 2006
BM9	All hot works to be undertaken with a hot work permit which must state that all flammable material must be removed from the vicinity of the works	Construction	Supervisor	PBP 2006
Access and Compounds				
BM10	All site offices will be accessible via access roads suitable for firefighting appliances similar to NSW RFS category 1 tankers.	Construction	Supervisor	PBP 2006
BM11	Access roads will be well maintained and inspected to ensure that they are adequate	Construction	Supervisor	PBP 2006
BM12	The emergency assembly point and evacuation routes will be clearly signposted and communicated	Construction	Supervisor	PBP 2006
BM13	All site offices and temporary buildings will be located outside buffer areas to ensure minimum setbacks of 10m	Construction	Supervisor	PBP 2006
BM14	Buffer zones must be maintained to allow full access at all times throughout Construction.	Construction	Supervisor	PBP 2006
BM 15	Fire trails will remain clear of vehicles and plant to enable access for management of APZs.	Construction	Supervisor	PBP 2006
Vegetation Management				
BM16	Trees and other vegetation in the vicinity of power lines and tower lines should be managed and trimmed in accordance with the specifications in "Vegetation Safety Clearances" issued by Energy Australia (NS179, April 2002).	Construction	Supervisor	PBP 2006
BM17	Perimeter vegetation buffer zones will be clearly designated and shall not be used at any time for storage of materials during Construction	Construction	Supervisor	PBP 2006

Item	Management Measure	Timing	Responsibility	Reference
BM18	Stockpiles of mulch will be maintained and turned regularly to minimise potential for spontaneous combustion	Construction	Supervisor	PBP 2006
Consultation				
BM19	The contractor will actively engage in, and maintain, on-going consultation with RailCorp and the Rural Fire Service to facilitate hazard reduction activities in proximity to the Project	Construction	Project Manager	PBP 2006

6 EMERGENCY RESPONSE

During conditions of bushfire the initial response of all site personnel will be to ensure safe mobilisation (refuge), beyond the reach of bushfire, to the nominated bushfire emergency assembly area. This procedure will be detailed within the Contractor’s Construction Emergency Response Plan (CERP).

The contractor will inform the client and relevant statutory and regulatory authorities (such as the EPA) in the event of an incident as necessary including details of the date, location and area burnt.

Other types of environmental emergencies which could occur on the Project are outlined in Appendix R of the CEMP.

6.1 Activation of Bushfire Emergency Response

Bushfire response operations will begin on receipt of National Fire Danger Rating advice indicating, or when other evidence leads to, an expectation of bushfire, as detailed in Table 6.

The Bureau of Meteorology also issue fire weather warnings when weather conditions are conducive to the spread of dangerous bushfires. Warnings are generally issued within 24 hours of the potential onset of hazardous conditions. Warnings are also broadcast on radio and television.

The Bureau of Meteorology does not have the power to declare a total fire ban. This responsibility resides with the NSW Rural Fire Service.

Table 6 Fire Danger Rating alert and activation levels.

Response Item	Action	Procedures	Responsibility
Fire Danger Rating: Low Moderate High Very High	Monitor daily weather / fire danger rating	Monitor NSW Rural Fire Service: http://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans Notify all on-site supervisors of fire danger rating.	Construction Manager
Fire Danger Rating: Very High	Increase level of alert, prepare for activation of ERP	Notify all on-site supervisors of fire danger rating.	Construction Manager
Fire Danger Rating: Severe	Increase level of alert, prepare for activation of ERP	Notify all on-site supervisors of fire danger rating. Monitor Bureau of Meteorology (BOM) website.	Construction Manager
Fire Danger Rating: Extreme	Increase level of alert, prepare for activation of ERP	Notify all on-site supervisors of fire danger rating. Prepare for activation of bushfire emergency response procedures. Monitor Bureau of Meteorology (BOM) website.	Construction Manager
Fire Danger Rating: Catastrophic	Mobilise site personnel to designated emergency assembly area or evacuation assembly area.	Immediately notify all personnel of the activation of bushfire emergency response procedures.	Construction Manager

Response Item	Action	Procedures	Responsibility
	Close site to external visitors		

6.1.1 Total Fire Ban

The NSW Rural Fire Service Commissioner will declare a Total Fire Ban when conditions warrant, and to reduce the risk of fires damaging or destroying life, property and the environment.

During a Total Fire Ban no personnel will be permitted to light, maintain or use a fire in the open, or to carry out any activity in the open that causes, or is likely to cause, a fire.

No general purpose hot works, such as welding or gas cutting will be carried out in the open on the site.

6.2 Emergency Contacts

Table 7 Emergency Contact details

Contact name	Telephone number	Address
OEH Pollution Hotline	131 555 or (02) 9995 5555 (if calling from outside NSW).	
Ministry of Health	(02) 9391 9000	
WorkCover	13 10 50	
Fire and Rescue NSW	000	
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
Client Representative	Contact details to be confirmed	
Interface Manager	Contacts details to be confirmed	
Contractor Environmental Representative	Contact details to be confirmed	
Contractor Project Manager	Contact details to be confirmed	
Contractor Health & Safety Manager	Contact details to be confirmed	
Contractor Community Representative	Contact details to be confirmed	

7 COMPLIANCE MANAGEMENT

7.1 Roles and Responsibilities

All roles and responsibilities are detailed in Section 10.1 of the CEMP. Further to this, the management measures outlined in Table 3 detail personnel responsible for undertaking specific actions.

7.2 Training

All site personnel shall undergo site specific induction training, which will include bushfire management. Toolbox meetings will also be undertaken as and when required.

7.3 Monitoring, Auditing and Reporting

Monitoring, auditing and reporting will be undertaken in accordance with the CEMP. Audits and inspections will assess the effectiveness of the environmental controls and compliance with this this BMS and conditions.

7.4 Non-compliances, Non-conformance and Actions

It is the responsibility of all site personnel to report non-compliances and non-conformances to the Site Supervisor and/or the Contractor's EM.

Non-compliances, non-conformances and corrective and preventative actions will be managed in accordance with Section 9.2.1 of the CEMP.

7.5 Review and Improvement

Continuous improvement of this strategy will be achieved by the ongoing evaluation of environmental management performance against regulatory environmental policies, legislative requirements, SIMTA's Environmental Policy, Project objectives and targets for identifying opportunities for improvement.

The continuous improvement process is designed to:

- Identify areas of opportunity for improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets.

Any revisions to the BMS will be in accordance with the process outlined in Section 1.6 of the CEMP. A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure.

This strategy will be reviewed annually as a minimum but may be updated more regularly depending on process changes and refinements.

APPENDIX A

NSW RFS Bush Fire Provisions - Landscaping and Property Maintenance