

OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN – ADDENDUM

Moorebank Intermodal Precinct –
Precinct West South

23 OCTOBER 2024

Moorebank Intermodal Precinct – Precinct West South

EPBC 2011/6086 Approval, SSD 5066 Development Consent, SSD 7709 Development Consent and Complying Development Consent 230736/01

Operational Environmental Management Plan – Addendum

Author

Checker

Approver

Report No J192720241024.02

Date 24/10/2024

Revision Text 02

<https://moorebankintermodalprecinct.com.au/>

© Copyright 2024 ESR Australia & NZ. The concepts and information contained in this document are the property of ESR Australia & NZ. Use or copying of this document in whole or in part without the written permission of ESR constitutes an infringement of copyright. Limitation: This report has been prepared on behalf of, and for the exclusive use of ESR's Client, and is subject to, and issued in accordance with, the provisions of the contract between ESR and the Client. ESR accepts no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this report by any third party.

Limitations on use and reliance

Aspect Environmental Pty Ltd has prepared this report solely for the use of the Client and those parties with whom a warranty / end-user agreement or licence has been executed, or with whom an assignment has been agreed. Should any third party wish to use or rely upon the contents of the report, written approval must be sought from Aspect Environmental Pty Ltd; a charge may be levied against such approval.

Aspect Environmental Pty Ltd accepts no responsibility or liability for:

- a) the consequences of this document being used for any purpose or project other than for which it was commissioned, and*
- b) the use of, or reliance on, this document by any third party with whom an agreement has not been formally executed.*

The work undertaken to provide the basis of this report comprised a study of available documented information from a variety of sources (including the Client).

Should additional information become available which may affect the opinions expressed in this report, Aspect Environmental Pty Ltd reserves the right to review such information and, if warranted, to modify the opinions accordingly.

Author Details

Author Details	Qualifications and Experience
██████████	BSc, Dipanshi, MSc ██████████ has 30+ years as an environmental scientist and project manager and director, in the water, transport, energy, communications, industrial and other sectors, both in Australia and internationally.
██████████	BEnvSc (Hons1), GradCert EnvPI 18 years of experience in environmental planning, assessment and management.

Revisions

Revision	Date	Description	Prepared by	Approved by
01	14/06/2024	Draft for client review	██████████	██████████
02	24/10/2024	Final for issue	██████████	██████████

DECLARATIONS OF ACCURACY

LOGOS MLP Development Management PTY LTD (as joint approval holder)

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

Signed

Full name

Organisation LOGOS MLP Development Management Pty Ltd (ACN: 649 469 778)

Date

2 December 2024



Qube Re Services (No. 2) (as joint approval holder)

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

Signed

Full name

Organisation

Qube Re Services (No. 2) Pty Limited (ACN: 605 751 782)

Date

26/11/24

ACRONYMS AND DEFINITIONS

Acronym/Term	Meaning
AEC	Area of environmental concern
AS	Australian Standard
CoA	Condition(s) of Approval of EPBC 2011/6086 Approval
CoC	Condition(s) of consent
DCCEEW	Department of Climate Change, Energy, the Environment and Water (formerly DotEE)
DPE	Department of Planning and Environment (formerly the Department of Planning, Industry and Environment)
DPHI	NSW Department of Planning, Housing and Infrastructure (formerly the Department of Planning and Environment)
DotEE	Department of the Environment and Energy (now DCCEEW)
EMP	Environmental management procedure included in the LTEMP (EP Risk, 1 December 2020)
EMS	Environmental Management System
EO	Exploded ordnance
EOW	Exploded ordnance waste
EPA	NSW Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
ESR	ESR Australia & New Zealand
HSE	Health, Safety and Environment
ICAM	Incident Cause Analysis Method
IMT	Intermodal Terminal
IPC	Independent Planning Commission
LVMP	Landscape Vegetation Management Plan
LTEMP	Long Term Environmental Management Plan
MIP	Moorebank Intermodal Precinct
MOD 1	Modification 1 to SSD 7709, granted by the IPC 24 December 2020
MOD 2	Modification 1 to SSD 7709, granted by the IPC 30 September 2021
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
MPW Stage 3 POEMP	MPW Stage 3 Precinct Operational Environmental Management Plan
NRS	National Relay Service
NZS	New Zealand Standard
OAQMP	Operational Air Quality Management Plan

Acronym/Term	Meaning
OEH	Office of Environment and Heritage (now NSW Environment and Heritage)
OEMP	Operational Environmental Management Plan
OFFMP	Operational Flora and Fauna Management Plan
ONMP	Operational Noise Management Plan
OTAMP	Operational Traffic and Access Management Plan
PFOA	Perfluorooctane sulfonic acid
PFOS	Perfluorooctanoic acid
POEO Act	Environment and Operations Act 1997
PPE	Personal Protective Equipment
REMM	Revised Environmental Management Measures
RtS	Response to Submissions
SIOMP	Stormwater Infrastructure Operation and Maintenance Plan
SQMP	Stormwater Quality Monitoring Program
SSD	State Significant Development
TEUs	Twenty-foot Equivalent Units
UFP	Unexpected Finds Protocol
UXO	Unexpected ordnance
WHS	Work Health and Safety
WTP	Workplace Travel Plan

TABLE OF CONTENTS

DECLARATIONS OF ACCURACY	V
ACRONYMS AND DEFINITIONS	VII
1 INTRODUCTION	1
1.1 Development Ownership	1
1.2 Moorebank Intermodal Precinct Overview	1
1.3 Addendum Purpose	1
1.4 Objectives and Targets.....	2
1.5 Consultation.....	3
1.6 Progressive Implementation of this Addendum	3
1.6.1 Distribution and Availability	3
1.6.2 Submission, Review and Update.....	4
1.7 Document Structure.....	4
2 DEVELOPMENT DESCRIPTION.....	6
3 STATUTORY REQUIREMENTS.....	9
3.1 Development Approvals	9
3.1.1 EPBC 2011/6086 Approval.....	9
3.1.2 EP&A Act Development Consents	9
3.1.3 CDC 230736/01	10
3.2 Legislation.....	10
3.3 Permits and Licences	10
3.4 Guidelines	11
4 ENVIRONMENTAL MANAGEMENT	12
4.1 Environmental Management System.....	12
4.2 MIP Sustainability Policy and Sustainability Framework	12
4.3 WHS Management System	13
4.4 MPW Stage 3 Precinct Operational Environmental Management Plan	13
4.5 Operational Environmental and Sustainability Objectives and Targets	14
4.6 Roles and Environmental Responsibilities	14
4.7 Training and Competence	15
4.8 Community Consultation and Complaints Management	15
4.9 Incident Management and Emergency Responses.....	15
4.9.1 Environmental Incidents	15
4.9.2 Incident Classification and Notification	16
4.9.3 Incident Response	18
4.9.4 Reportable Incidents.....	18
4.9.5 Incident Review	20
4.9.6 Emergency Contact Details	20

4.10 Document Control and Records	22
5 IMPLEMENTATION	23
5.1 Risk Assessment and Management	23
5.1.1 Aspects and Impacts Assessment.....	23
5.2 Environmental Management Measures.....	24
5.2.1 Environmental Aspects and Sub-plan Addenda.....	24
5.2.2 Environmental Forms.....	28
6 MONITOR AND REVIEW.....	30
6.1 Monitoring	30
6.1.1 Interface of Operation and Construction Area.....	32
6.2 Reporting	32
6.2.1 Management Review and Continuous Improvement	33
6.2.2 Compliance Reporting	33
6.3 Auditing and Inspections	33
6.3.1 Audit Requirements	33
6.3.2 Inspections.....	34
6.4 Non-compliance, Non-conformance and Corrective Actions.....	35
6.4.1 Non-conformance	35
6.4.2 Non-compliance.....	35

APPENDICES

- APPENDIX A – DEVELOPMENT APPROVAL COMPLIANCE MATRIX**
- APPENDIX B – DEVELOPMENT PERMITS AND LICENCES REGISTER**
- APPENDIX C – GUIDELINES AND CODES OF PRACTICE**
- APPENDIX D – ASPECTS AND IMPACTS REGISTER**

LIST OF TABLES

Table 4-1 Emergency contact details	20
Table 6-1 Summary of monitoring requirements for the Development	30
Table 6-2 Summary of reporting requirements for the Development	32
Table 6-3 Summary of audit requirements for the Development.....	34
Table 6-4 Development inspection summary	34

LIST OF FIGURES

Figure 2-1 MPW South Development site (MP01-23103-P7, Watson Young, September 2023).....	7
Figure 2-2 Aerial view of Warehouses S1, S2, S3, S5 and S6 (LOGOS 2023).....	8
Figure 4-1 LOGOS EMS Framework.....	12

Figure 4-2 LOGOS Sustainability Framework.....	13
Figure 4-3 Organisation Chart.....	14
Figure 4-4 Environmental incident notification and reporting	17
Figure 4-5 Environmental Incident Response flowchart.....	18

1 INTRODUCTION

1.1 Development Ownership

In 2022, LOGOS joined the ESR group of companies and since August 2024, the LOGOS and ESR operations have been integrated to now operate under the name ESR Australia & NZ (ESR). The applicant/ approval holder entity remains unchanged at this stage until further notice and references to LOGOS and LOGOS authored documents and/or plans may continue and remains relevant where LOGOS and ESR are used interchangeably.

1.2 Moorebank Intermodal Precinct Overview

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

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

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

MPW Stage 2 is located to the north of MPW South (the Development) and includes operation of a multi-purpose Intermodal (freight) Terminal facility, rail link connection, warehousing and a freight village. The MPW Stage 2 Operational Environmental Management Plan (OEMP) and sub-plans were approved by:

- the Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEEW) in accordance with Condition of Approval (CoA) 4 of the EPBC 2011/6086 Approval
- the NSW Department of Planning, Industry and Environment (DPIE) in accordance with Condition of Consent (CoC) C7 of the MPW Stage 2 (SSD 7709) Development Consent.

Operations on MPW Stage 2 commenced after these plans were approved.

1.3 Addendum Purpose

This Operational Environmental Management Plan – Addendum (Addendum) has been prepared to apply environmental management measures, where relevant, consistently for the operation of the Development and meet the relevant conditions of the applicable development approvals and consents. This Addendum is an addendum to the MPW Stage 2 OEMP that has been approved under the EPBC 2011/6086 Approval and the SSD 7709 Development Consent.

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

- the relevant conditions of the EPBC 2011/6086 Approval issued under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
- the relevant conditions of the MPW – Concept and Stage 1 (State Significant Development (SSD) 5066) Development Consent
- the relevant conditions of the MPW Stage 2 (SSD 7709) Development Consent
- the relevant conditions of the Complying Development Consent (CDC) 230736/01 issued under the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TISEPP).

This Addendum has been prepared specifically to address requirements of Conditions of Approval (CoA) 4-13 of the EPBC 2011/6086 Approval, which requires the preparation of an OEMP, to the satisfaction of the Federal Minister for the Environment (or delegate) and/or the relevant NSW regulator prior to commencement of operation. This Addendum has been prepared for submission to DCCEEW under CoA 21 of the EPBC 2011/6086 Approval, as a revision to an approved management plan for an action that would not be likely to have a new or increased impact.

This Addendum was developed in reference to the following documents:

- Moorebank Intermodal Terminal Project Environmental Impact Statement (Parsons Brinkerhoff, October 2014)
- Moorebank Intermodal Terminal Response to Submissions Report (Parsons Brinkerhoff, May 2015)
- Moorebank Intermodal Terminal Supplementary Response to Submissions Report (Parsons Brinkerhoff, August 2015), including Chapter 7 Revised environmental management measures
- MPW Stage 2 OEMP.

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

1.4 Objectives and Targets

The objectives of this Addendum are:

- Identify and comply with relevant environmental legal and other regulatory requirements applicable to the operation of the Development.
- Identify the environmental activities and impacts associated with operation of the MPW Stage 2 and provide management measures to minimise and manage impacts on the environment and community.
- Establish and define environmental roles and responsibilities.
- Assign responsibility for the implementation, management and review process of this Addendum.

- Provide a consistent and uniform approach to site environmental management such that the required standards for environmental protection are attained and maintained for the duration of the operation of the Development.
- Provide all operational personnel with sufficient information to undertake their activities in accordance with legal and other relevant environmental requirements.
- Provide a framework for training, development and support (systems, procedures and documentation) necessary to undertake operations.

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

1.5 Consultation

The MPW Stage 2 OEMP was prepared in consultation with stakeholders as detailed in Table 1-1 of the MPW Stage 2 OEMP.

No stakeholder consultation was required for the preparation of this Addendum and sub-plan addenda.

1.6 Progressive Implementation of this Addendum

This Addendum is applicable to the operation of the Development. Operation of the Development will not commence until this Addendum has been submitted for information to the Minister responsible for the EPBC Act (or delegate) under CoA 21 of the EPBC 2011/6086 Approval. The most recent version of this Addendum will be implemented to manage the potential impacts of the Development during operation.

Operational areas will come online progressively as warehouses are constructed, commissioned, and tenanted. As areas become operational, any adjacent construction areas will continue to be managed in accordance with the relevant approved Construction Environmental Management Plan – Addendum and sub-plans addenda, while operational areas will be managed in accordance with this Addendum and sub-plan addenda.

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

1.6.1 Distribution and Availability

A copy of the approved Addendum and sub-plan addenda will be kept at the Development Office and will be made available to relevant regulatory officers, the Certifying Authority and operational staff upon request.

In accordance with CoA 27 of the EPBC 2011/6086 Approval, each management plan will be published on the website of the person taking the action within one month of being approved or being submitted under CoA 21. This Addendum, sub-plan addenda and other nominated documents (listed in Section 1.6) and records will be published on the MIP website (<https://moorebankintermodalprecinct.com.au/>).

1.6.2 Submission, Review and Update

This Addendum will be submitted to DCCEE as required by CoA 21 of the EPBC 2011/6086 Approval prior to the commencement of operation of the Development.

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

Under CoA 21 of the EPBC 2011/6086 Approval, the revised document can be submitted to DCCEE for information if implementing the plan would not be likely to have a new or increased impact, and approval of the plan under Section 143A of the EPBC Act is not required. CoA 21 to 25 of the EPBC 2011/6086 Approval detail the process for review and implementation of the revised documents following submission to DCCEE. In the event that ESR or DCCEE considers that the implementation of the revised document would be likely to have a new or increased impact, approval of the revised documents under Section 143A of the EPBC Act will be required prior to implementation.

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

- Inspection outcomes (either by internal or external parties)
- Changes to the precinct-wide environmental management requirements (see Section 4.1)
- Changes to procedures and/or scope of works after an incident or potential incident
- Design or operational changes
- Opportunities for improvement identified as part of an investigation or non-compliance report
- Material complaints.

1.7 Document Structure

The structure of this Addendum is summarised below:

- **Section 1** provides a brief overview of the MIP and the purpose of the OEMP.
- **Section 2** provides a summary of operations.
- **Section 3** outlines the statutory requirements and obligations which need to be fulfilled during operations.
- **Section 4** describes the environmental management requirements for the Development, including environmental objectives and targets, community and stakeholder consultation and incident and emergency management. This section also outlines the roles and responsibilities for employees and others involved in operations, and relevant training and inductions required so that they are aware of their environmental obligations.
- **Section 5** provides the environmental risk analysis which identifies the key environmental risks and the environmental management measures that will be implemented for operations.
- **Section 6** provides the monitoring, reporting, and auditing requirements and management of non-compliance and non-conformance.

The following sub-plan addenda have been prepared in accordance with the relevant CoA (as noted below):

- Operational Traffic and Access Management Plan (OTAMP) – Addendum (CoA 5)
- Workplace Travel Plan (WTP) – Addendum (CoA 5)
- Operational Noise Management Plan (ONMP) – Addendum (CoA 6)
- Operational Flora and Fauna Management Plan (OFFMP) – Addendum (CoA 7)
- Stormwater Quality Monitoring Program (SQMP) – Addendum (CoA 9)
- Stormwater Infrastructure Operation and Maintenance Plan (SIOMP) – Addendum (CoA 9)
- Landscape Vegetation Management Plan (LVMP) – Addendum (CoA 10)
- Operational Air Quality Management Plan (OAQMP) – Addendum (CoA 10).

The CoA (as noted below) also require the preparation of the following OEMP sub-plans and supporting documents:

- Long Term Environmental Management Plan (LTEMP) (CoA 8)
- Unexpected Finds Protocol (Appendix H to the MPW Stage 2 OEMP) (CoA 11 and CoA 12)
- Light Spill Management (Appendix G to the MPW Stage 2 OEMP) (CoA 13).

This Addendum references these documents, and their requirements will be implemented during the operation of the Development. The current version of this Addendum and the other documents listed above are available for reference on the MIP website (<https://moorebankintermodalprecinct.com.au/>).

2 DEVELOPMENT DESCRIPTION

The Development comprises Warehouses S1, S2, S3, S5 and S6, located within the southern portion of the MPW footprint. The operation of the Development also includes ancillary infrastructure, namely car parking, landscaping, signage and lighting. Bushmaster Avenue provides truck and car access to the Development site.

The warehouses have been approved to operate 24 hours per day, 365 days per year. Heavy and light vehicles would access the warehouses via the main site access off Moorebank Avenue and Bushmaster Avenue, light vehicles would park in the allocated parking area adjacent to each warehouse and heavy vehicles would progress to the truck loading/unloading areas alongside each warehouse. Containers would be transferred directly to the warehouses from the rail terminals located to the east of the Development site.

The future tenant(s) for the warehouses are currently unknown, and so further details on future warehouse operations, for example chemical, fuels and/or dangerous goods handling and storage, are currently not available.

The Development site is shown in Figure 2-1. Figure 2-2 shows an aerial view of the MPW South warehouses.

Figure 2-2 Aerial view of Warehouses S1, S2, S3, S5 and S6 (LOGOS 2023)



3 STATUTORY REQUIREMENTS

The operation of the Development is required to comply with all relevant development approvals and consents legislation, permits, and licences applicable to the Development site. Where updated or revised versions of guidelines, protocols, standards or policies, or a replacement of these are available, the most recent versions would be reviewed and their applicability to this Addendum determined.

3.1 Development Approvals

The Development was approved under both the EPBC Act and *Environment Planning and Assessment Act 1979* (EP&A Act). The approval, consent and certificate granted under these acts include conditions relevant to operations and potential environmental impacts as detailed below. The compliance of this Addendum with the relevant conditions of the approval and consents is detailed in Appendix A.

3.1.1 EPBC 2011/6086 Approval

The EPBC 2011/6086 Approval for the MPW Concept was granted by DotEE (now DCCEEW) in September 2016 and varied on 17 September 2019 and 22 April 2022. The operation of the Development will be consistent with EPBC 2011/6086 Approval, where relevant.

EPBC 2011/6086 Approval includes specific CoA that are required to be met during operations. Additionally, the CoA refer to various provisional management frameworks and the Revised Environmental Management Measures (REMM) of the “finalised EIS” (i.e. the Moorebank Intermodal Terminal Supplementary Response to Submissions (RtS), Parsons Brinckerhoff, August 2017).

The EPBC 2011/6086 Approval specifies the development phase in which the requirements must be met; during detailed design, early works, construction and/or operations. The relevant requirements are identified within Appendix A, along with where they have been addressed in preparing this Addendum.

3.1.2 EP&A Act Development Consents

The MPW Concept and Stage 1 (SSD 5066) Development Consent was granted on 3 June 2016 (and modified on 30 October 2019 and 24 December 2020). The CoC under Schedule 2 (Terms of Approval) are potentially relevant to the operation of the Development, although CoC under Schedule 3 (Stage 1 Early Works) and Schedule 4 (Future Development Applications) are not. The operation of the Development will be consistent with the SSD 5066 Development Consent, where relevant.

As noted above, the REMM detailed in the Moorebank Intermodal Terminal Supplementary RtS (Parsons Brinckerhoff, August 2017) are relevant to this Addendum.

The MPW Stage 2 (SSD 7709) Development Consent was approved on 11 November 2019 by the NSW Independent Planning Commission (IPC) and subsequently reissued by the NSW Land and Environment Court on 24 December 2021. The SSD 7709 Development Consent was modified by the IPC on 24 December 2020 and 30 September 2021.

The SSD 7709 Development Consent defines ‘site’ as including the area of the Development. Therefore, CoC that refer to the “site” may apply to operation of the Development.

The relevant CoC and REMMs are identified within Appendix A, along with where they have been addressed in preparing this Addendum.

3.1.3 CDC 230736/01

CDC 230736/01 was issued by the Certifier for the construction and operations of the Development under the TISEPP on 27 February 2024. The CDC included conditions consistent with those required under Part 2 of Chapter 6 of the TISEPP and no additional conditions were included. Nonetheless, the CDC included conditions relevant to the operation of the Development and this Addendum.

CDC conditions are identified within Appendix A, along with where they have been addressed in this Addendum and sub-plan addenda.

3.2 Legislation

The regulatory framework relevant to the operation of the Development is documented in Appendix F of the MPW Stage 2 OEMP. This framework identifies relevant legislative instruments, their key objectives and their application to the Development.

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

3.3 Permits and Licences

Permits and licences relevant to the operation of the Development are detailed in Appendix B of the MPW Stage 2 OEMP. This register will be revised and updated in conjunction with the management review outlined in Section 6.2.1 of this Addendum, or when there has been a change to relevant legislation.

Where relevant, compliance conditions relating to items listed on this register are incorporated into this Addendum and the sub-plan addenda.

The key permits and licences applicable to operations are:

- An environmental protection licence may be required for operations under the *Protection of the Environment and Operations Act 1997* (POEO Act) in the event that an activity scheduled under Schedule 1 of the POEO Act is carried out.
- If any adjustments or relocations of a public utility are required in the future during operations, approval from the relevant utility service providers will be sought by ESR prior to undertaking the works.
- As detailed in the OTAMP – Addendum, the transport of any dangerous goods by road will comply with:
 - Dangerous Goods (Road and Rail Transport) Act 2008
 - Dangerous Goods (Road and Rail Transport) Regulation 2014

- Managing risks of hazardous chemicals in the workplace (SafeWork NSW, July 2014)
- NSW Environment Protection Authority (EPA) requirements for transporting dangerous goods by road and rail.

3.4 Guidelines

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

This Addendum and its sub-plan addenda have been prepared in accordance with a list of guidelines and codes of practice as detailed in Appendix C, including the *Environmental Management Plan Guideline – Guideline for infrastructure Projects* (DPE, 2020) and the *Environmental Management Plan Guidelines* (Commonwealth of Australia, 2014).

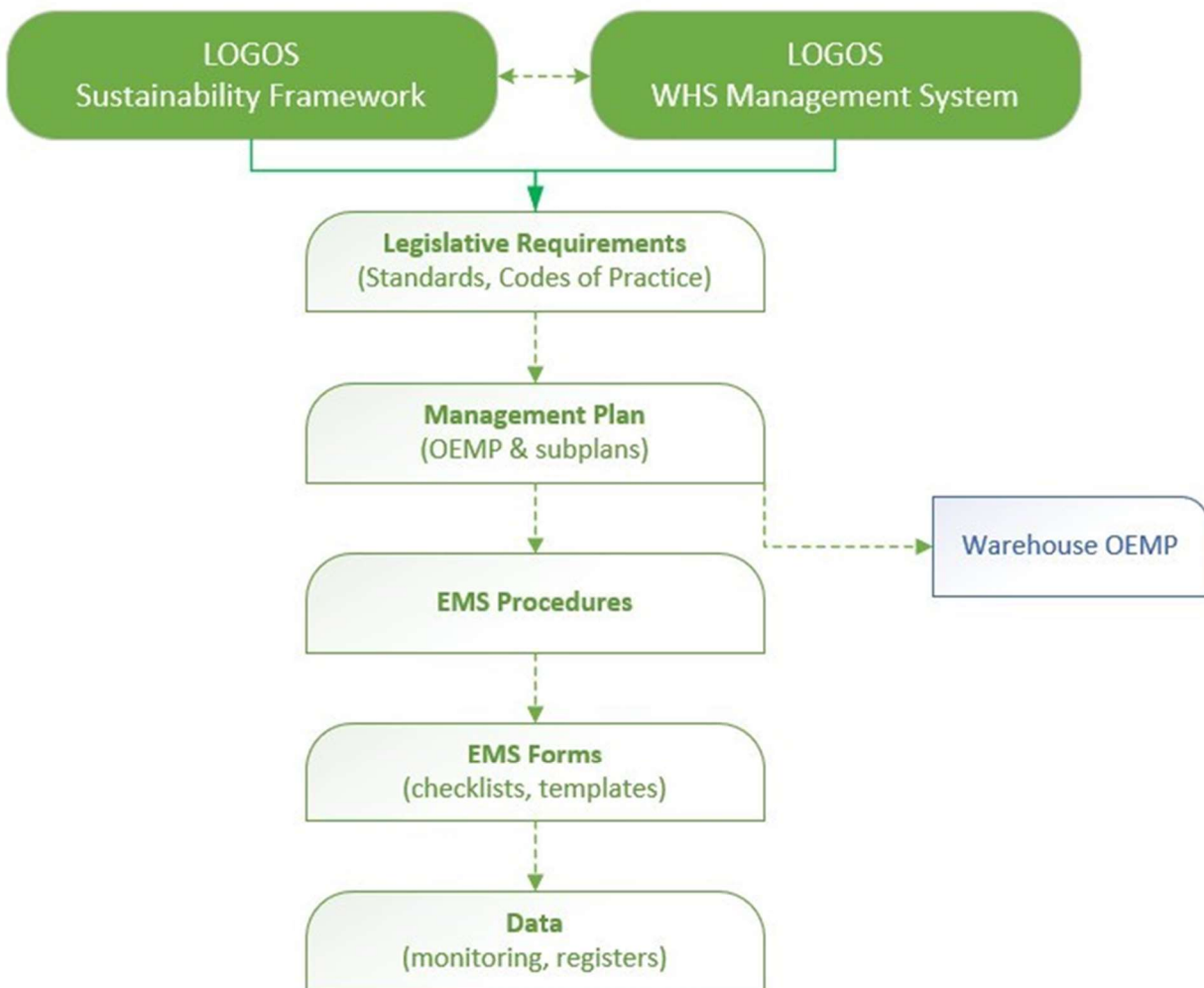
Refer to the relevant sub-plan addenda, available on the MIP website (<https://moorebankintermodalprecinct.com.au/>) for further information.

4 ENVIRONMENTAL MANAGEMENT

4.1 Environmental Management System

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

Figure 4-1 LOGOS EMS Framework



4.2 MIP Sustainability Policy and Sustainability Framework

The LOGOS Sustainability Policy (Appendix E of the MPW Stage 2 OEMP) describes the commitment to provide sustainable, integrated logistics solutions that add value to its customers, investors, partners and communities.

LOGOS' Group Sustainability Framework (Figure 4-2) describes its commitment to environmental excellence through minimising impacts, enhancing climate resilience, and generating positive outcomes. The Development and its tenants will operate in accordance with this framework.

Figure 4-2 LOGOS Sustainability Framework



4.3 WHS Management System

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

The Development will be operated in accordance with the WHS Management System as detailed in Section 4.3 of the MPW Stage 2 OEMP.

4.4 MPW Stage 3 Precinct Operational Environmental Management Plan

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

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

The MPW S3 POEMP has been included as Appendix I to the MPW Stage 2 OEMP for completeness and ease of reference.

4.5 Operational Environmental and Sustainability Objectives and Targets

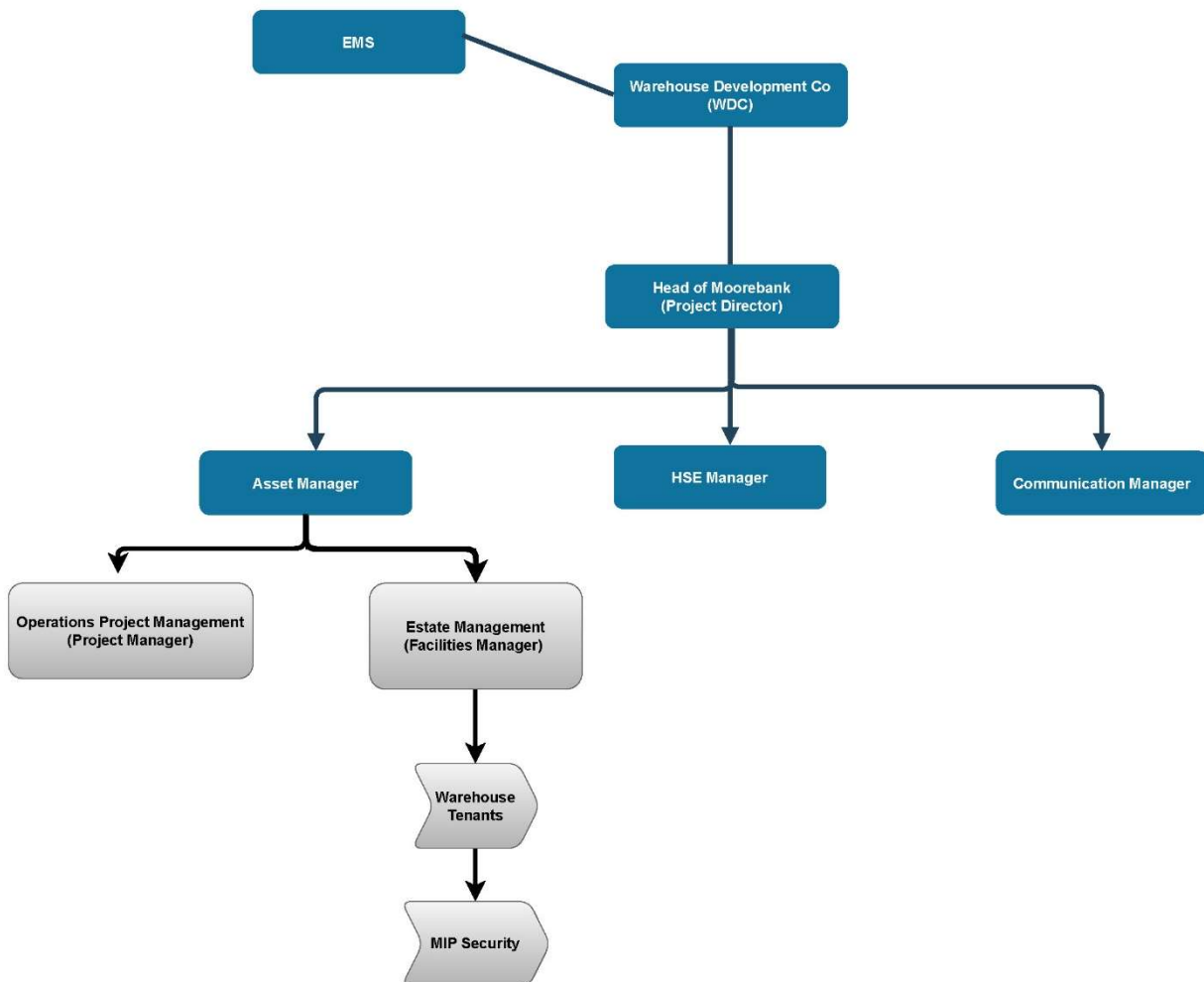
The operational environmental and sustainability objectives and targets detailed in Section 4.5 of the MPW Stage 2 OEMP apply to the Development.

4.6 Roles and Environmental Responsibilities

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

The interaction between the organisations involved in operations is shown in Figure 4-3.

Figure 4-3 Organisation Chart



The key operational roles for the operation of the Development:

- Asset Manager
- Facilities Managers
- Health Safety and Environment (HSE) Manager

- Communications Manager
- Warehouse Tenants
- All personnel.

The environmental management responsibilities of these roles are outlined in Section 4.6 of the MPW Stage 2 OEMP.

4.7 Training and Competence

All personnel are to complete general environmental awareness training and training relevant to their responsibilities under this Addendum; the level of which would be dependent on the exposure to environmental hazards and their involvement in environmental management. Section 4.7 of the MPW Stage 2 OEMP details the environmental training requirements, including:

- Visitor induction
- General induction
- Development Management Team training
- Vocational training.

4.8 Community Consultation and Complaints Management

There are no specific community consultation requirements that apply to the operation of the Development.

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

4.9 Incident Management and Emergency Responses

4.9.1 Environmental Incidents

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

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

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

4.9.2 Incident Classification and Notification

Environmental incidents are classified at one of five levels as defined in Table 4-4 of the MPW Stage 2 OEMP:

- Level 1 Insignificant
- Level 2 Minor
- Level 3 Moderate
- Level 4 Major
- Level 5 Critical.

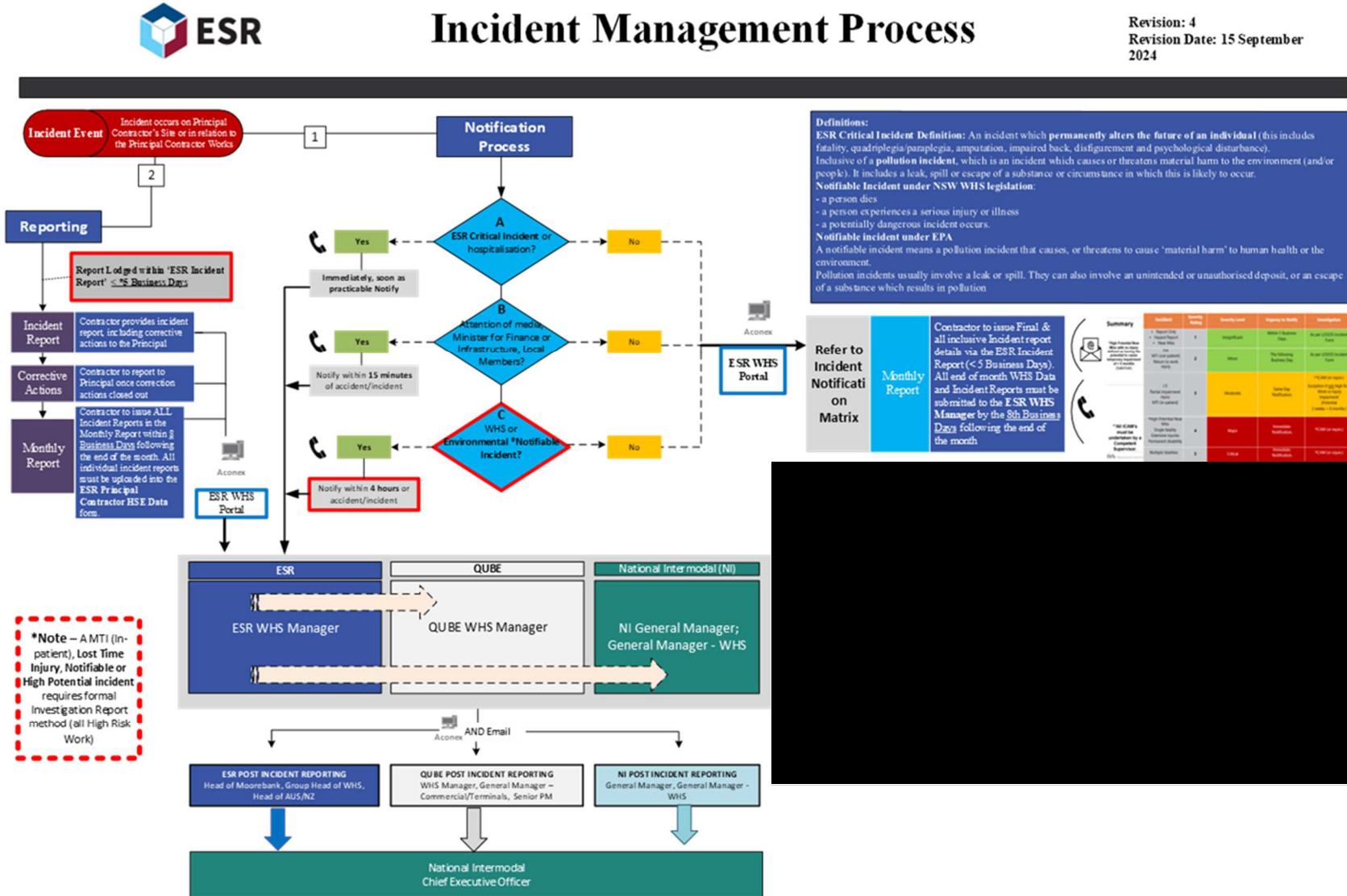
Incidents are either reportable or non-reportable as follows:

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

All environmental incidents are to be reported and managed in accordance with LOGOS Incident Reporting and Management Procedure (WHSMS-LOGOS-007), reproduced in Figure 4-4. Incident reporting is detailed in Section 4.9.4.

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

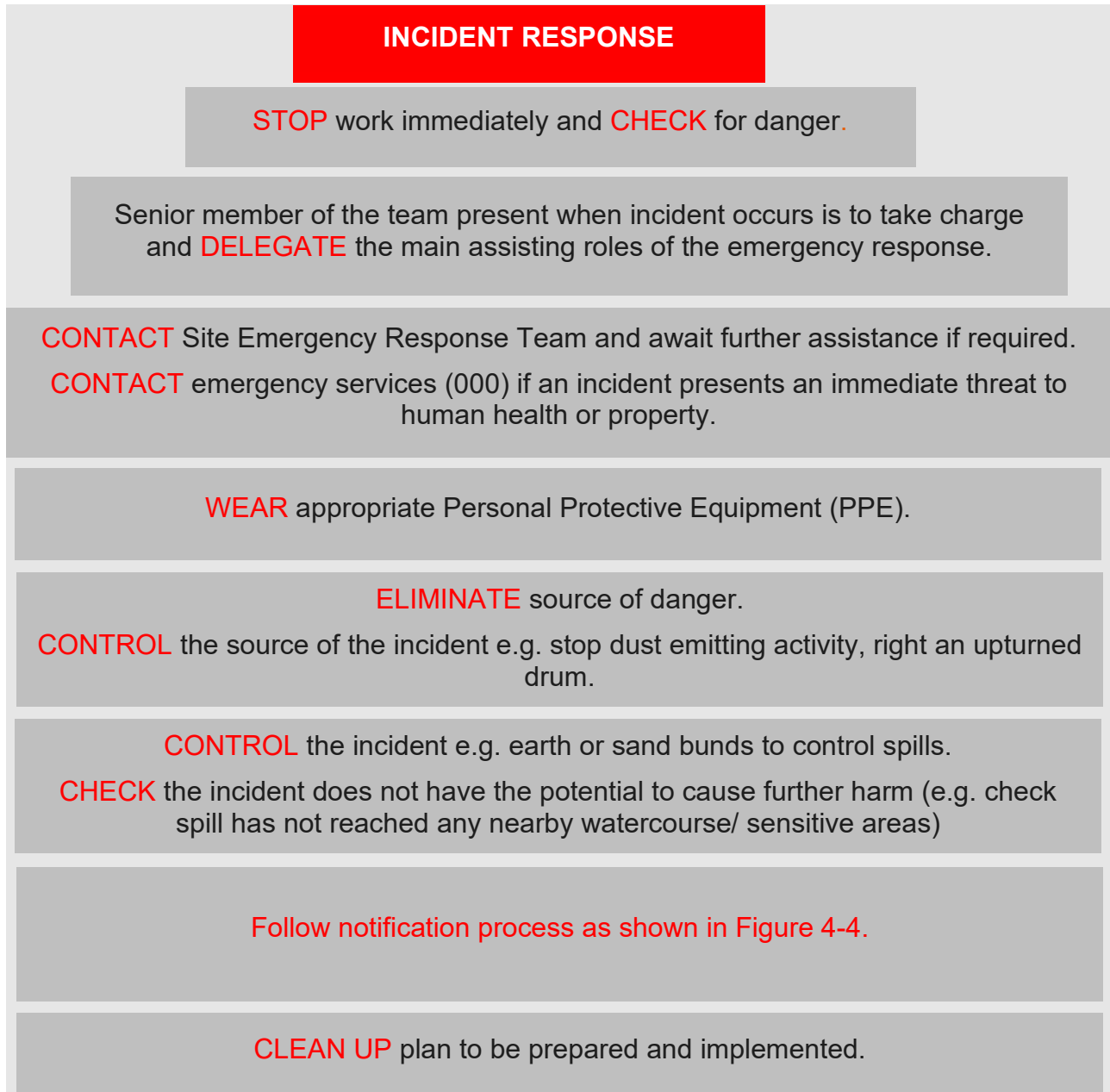
Figure 4-4 Environmental incident notification and reporting



4.9.3 Incident Response

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

Figure 4-5 Environmental Incident Response flowchart



4.9.4 Reportable Incidents

Regulatory authorities will be notified of actual or potential Level 2-5 incidents. The notification processes for the relevant regulatory authorities are detailed below. Records of contact with, and details of the information provided to external authorities will be maintained by the HSE Manager.

4.9.4.1 EPA

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

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

4.9.4.2 DCCEEW

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

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

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

4.9.4.3 Other Relevant Authorities

In addition to notifying the EPA and DCCEEW of pollution incidents, the Asset Manager is also required to notify other regulatory authorities listed below (contact details are provided in Table 4-1):

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

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

4.9.5 Incident Review

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

Within three days of a potential or actual Level 3, Level 4 or Level 5 incident, the HSE Manager will convene a briefing to provide an update on the incident to relevant senior management.

The following information relating to the incident will be documented:

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

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

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


4.9.6 Emergency Contact Details

Emergency contact details are included in Table 4-1.

Table 4-1 Emergency contact details

Service	Authority	Contact Number
Local Emergency Operations Controller	Emergency	000
Knight Frank – Facilities Response Centre	Local	██████████
Fire Brigade	Emergency	000
Ambulance	Emergency	000
Liverpool Police Station	Emergency	02 9821 8444
State Emergency Service	Emergency	13 25 00
Liverpool Hospital Cnr Elizabeth and Goulburn Streets Liverpool NSW 2170	Local	02 8738 3000

Service	Authority	Contact Number
Local Medical Centre Elizabeth Drive Medical Centre, 177 Elizabeth Dr, Liverpool	Local	02 9600 7778
NSW Fire and Rescue	Local	1300 729 579
NSW Rural Fire Service Cnr Alderney Street and Townson Avenue, Minto NSW 2566	Local	1800 679 737 02 9603 7077
RMS Traffic Incident Reporting	Local	13 17 00
Sydney Trains Safety Incident and Injury	Local	1800 772 779
Sydney Trains Rail Management Centre	Local	02 9379 1743
ARTC Australian Rail Track Corporation (Enquiries)	Local	(08) 8217 4366
OEH Hotline	Emergency	13 15 55 02 9995 5555 (if calling from outside NSW)
Poisons Information	Poison Information	13 11 26
Liverpool City Council Ground Floor, 33 Moore St, Liverpool NSW 2170	Customer Contact Centre for NSW residents	1300 36 2170
	Calling from interstate	02 9821 9222
	National Relay Service (NRS) for hearing and speech impaired customers	133 677
Safe Work NSW	Customer Contact Number	13 10 50
	NRS for hearing and speech impaired customers	133 677
Knight Frank Facility Manager	Local	██████████
ESR Asset Manager	Local	██████████
ESR Site HSE Manager	Local	██████████
Emergency Response Team	See 'Emergency Management Plan & Communication Chart'	
Utilities		
Electricity	Ausgrid (24 hours)	13 13 88
	Endeavour Energy (24 hours)	13 10 03

Service	Authority	Contact Number
Water	Sydney Water	13 20 90
Gas	Jemena	13 19 09
Network	Telstra	13 22 03
	Optus	13 39 37
	NBN	1800 687 626
After Hours Contact		
Security Guard	PSI Corporate	

4.10 Document Control and Records

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

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

All documentation, including environmental records, is to be controlled in accordance with the LOGOS WHS Management System document control system and the MPW South contractual requirements. Documents are to be forwarded to ESR for publication on the MIP website (if required). The MIP website will be the primary Document Control System used during operations. MIP website is to be used to store records, documents, and plans as a minimum.

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

5 IMPLEMENTATION

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

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

As per Section 4.7, ESR employees, warehouse tenants and contractors are to be trained in the requirements of this Addendum to enable the environmental risks to be managed in accordance with this Addendum and the relevant statutory requirements.

5.1 Risk Assessment and Management

Environmental aspects, impacts and opportunities associated with the operation of the Development have been identified and assessed based on a review of the Aspect and Impact Register included in Appendix D of the MPW Stage 2 OEMP.

The key environmental aspects and impacts for operations are:

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

5.1.1 Aspects and Impacts Assessment

A review of the Aspects and Impacts Register (Appendix D of the MPW Stage 2 OEMP) was undertaken to identify and update the aspects and impacts resulting from operation of the Development and to determine the relevant risk ranking, control measures and residual risk ranking.

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

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

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

5.2 Environmental Management Measures

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

5.2.1 Environmental Aspects and Sub-plan Addenda

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

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

The key environmental aspects are assessed in the relevant sub-plan addenda to this Addendum which provide the specific detailed control measures being implemented to manage the complete range of environmental aspects. The relevant sub-plan addenda to this Addendum are:

- OTAMP – Addendum
- WTP – Addendum
- ONMP – Addendum
- OFFMP – Addendum
- SQMP – Addendum
- SIOMP – Addendum
- LVMP – Addendum
- OAQMP – Addendum.

The CoA also require the preparation of the following sub-plans and supporting documents:

- LTEMP
- Unexpected Finds Protocol (Appendix H to the MPW Stage 2 OEMP)
- Light Spill Management (Appendix G to the MPW Stage 2 OEMP).

The following sections address the other environmental aspects relevant to the operation of the Development.

5.2.1.1 Visual Impact

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

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

Further detail regarding light spill management is provided in Appendix G of the MPW Stage 2 OEMP.

5.2.1.2 Water Quality

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

- Promptly report all spills to the HSE Manager.
- Spills are to be managed in accordance with the Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin (EPA, 1997).
- Emergency spill clean-up kits will be maintained on site in agreed locations that are accessible and known to all site workers.
- Spill kits will be used in the event of inadvertent spills of fuels, oils, hydraulic fluids and other hazardous wastes to contain the spill and avoid contamination of waters.
- Personnel will be trained in the use of spill kits.
- Hazardous materials and waste will be managed and disposed of in accordance with the LTEMP.
- Standby or emergency generators and transformers operated on site will have secondary containment.
- Oil coolers will generally be located in areas where leaks and runoff are appropriately controlled at source or in a retention basin.

5.2.1.3 Waste

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

- No hazardous or regulated wastes will be disposed of on site.
- Other dangerous goods, including any waste materials present on site, would be suitably contained, with secondary containment and runoff controls implemented where appropriate to prevent leaks or spills migrating to environmentally sensitive areas, in particular via stormwater systems that drain to the Georges River.
- Waste disposal will be in accordance with the POEO Act, *Waste Avoidance Resource Recovery Act 2001* and the EPA's NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.
- Waste that is unable to be reused or recycled will be disposed of off site to an EPA approved waste management facility following classification in accordance with EPA Waste Classification Guidelines (2014).
- Waste separation and segregation will be promoted to facilitate reuse and recycling.
- Liquid wastes to be stored in appropriate containers in bunded areas until transported off site (if applicable).
- If present on site, hazardous material and waste will be managed by appropriately qualified and licensed contractors in accordance with the LTEMP.
- All recyclable or non-recyclable wastes to be stored in appropriate bins or skips with regular replacement and disposal of the bins to approved and appropriately licensed facilities.
- An education programme and on-going monitoring for training personnel to properly sort and transport waste into the right components and destinations.

5.2.1.4 Contamination

Contamination has been remediated on the MPW Site in accordance with the Land Preparation Works Stage 1 and Stage 2 – Remediation Action Plan (Golder, 2016). The completed remediation works were validated in the Remediation Validation Report, Land Preparation Work – Demolition and Remediation Moorebank Property West, Moorebank, NSW (JBS&G, 2020), which reported the site had been remediated to a commercial/industrial land use and was therefore suitable for the intended Intermodal Terminal, subject to the implementation of an LTEMP covering the operation of the site.

An LTEMP has been prepared for the MPW Site (Long-Term Environmental Management Plan – Moorebank Precinct West Site, 400 Moorebank Avenue, Moorebank, NSW, EP Risk, v13, 01/12/2020) and was approved by the (then) Commonwealth Department of Agriculture, Water and the Environment on 26 October 2021.

The LTEMP was prepared in accordance with the requirements of relevant legislation, regulations, codes of practice, Australian Standards, CoC and CoA to address the potential risk to human health and the environment from impacted media during the (construction and) operation on the MPW Site.

Section 3 of the LTEMP details the areas of environmental concern (AEC) remaining on site following remediation, including:

- AEC 1 – Chlorinated hydrocarbons impact (Trichloroethylene and Cis-1,2-dichloroethene) and total recoverable hydrocarbons in the north-west portion of the site to the south of the ABB Building (not relevant to the Development).
- AEC 2 – Petroleum hydrocarbon impact including light non-aqueous phase hydrocarbons in the eastern portion of the site.
- AEC 3 – PFAS impact associated with historical fire-fighting training.
- Other areas not able to be remediated (for various reasons) consisting of underground services and anthropogenic fill materials.

The objectives of the LTEMP include the development of management measures for the management of these AEC and contamination impacted materials that may be encountered during operations, including monitoring and reporting to satisfy relevant health and safety and environmental legislation.

The LTEMP must be implemented for all operational activities being undertaken on the MPW Site, including the Development. Operations of the Development will occur on areas covered by roadways, pavement and hardstand areas in conjunction with the warehouse built forms. There are also landscaped areas on the Development site. Therefore, the LTEMP covers the following operational activities that have the potential to encounter contamination impacted material on the site:

- Sub-surface maintenance works
- Maintenance of landscaped areas
- Groundwater and surface water monitoring
- Operation and maintenance of the Engineered Stockpile in AEC 3.

The LTEMP includes specific environmental management procedures (EMPs) for these activities:

- EMP11 Importation of Fill Material/Aggregate – The objective of this EMP is to ensure that only material fit for purpose and lawfully able to be brought onto site is imported either temporarily or permanently onto the subject site.
- EMP12 Subsurface Maintenance Works – The objective of this EMP is to ensure that subsurface maintenance works will not result in risk to human health and the environment.
- EMP13 Landscape Maintenance – The objective of this EMP is to ensure that landscape maintenance works will not result in risk to human health and the environment.
- EMP14 Unexpected Finds – The objective of this EMP is to minimise exposure of contractors and site personnel to impacted sub-surface soils during future excavation works beneath the site.
- EMP21 Contingency Plan – The objective of this EMP is to ensure that in the event of unplanned exposure of impacted materials all appropriate measures are implemented to minimise the risk to on site personnel and the environment.
- EMP26 Cessation of LTEMP Application – The objective of this EMP is to ensure impacts associated with residual issues requiring management at the site during

(construction and) operation have been appropriately resolved to ensure the ongoing suitability for the proposed land use.

These EMPs will be implemented during operation of the Development.

- The risk of operational activities causing contamination of soils on the site will be mitigated through the implementation of the following mitigation measures:
- Diesel tanks (used for refuelling) will be self-bunded and compliant with AS 1940:2004 The storage and handling of flammable and combustible liquids.
- Spill kits must be provided on site at all times.
- A refuelling procedure must be developed and implemented for all refuelling activities undertaken.
- Fuel stored on the Development site must only be used for the purposes of refuelling plant and equipment used at the Development.
- Unexpected contamination finds must be managed in accordance with the Unexpected Finds Protocol (Appendix H of the MPW Stage 2 OEMP).

In the event of an oil, chemical or fuel spill that results in an emergency situation, the processes detailed in the MPW Stage 2 Operational Emergency Response Plan will be implemented on the Development site.

5.2.1.5 Heritage

Any unexpected heritage finds, Aboriginal and non-Indigenous, will be managed in accordance with the Unexpected Finds Protocol (UFP) provided as Appendix H of the MPW Stage 2 OEMP.

5.2.1.6 Maintenance of Emergency Facilities

In the event that maintenance or other work on existing alarm signalling equipment results in a loss of a monitoring service, fire watch measures will be implemented during the period of the loss of service.

5.2.2 Environmental Forms

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

- Project induction and training register/records
- Weekly environmental inspection form
- Water discharge permit
- Noise and vibration monitoring form

- Air quality monitoring form
- Water quality monitoring form
- Waste tracking spreadsheet
- Energy consumption register
- Water consumption register
- Materials register (including material specifications)
- Corrective actions register
- Incident register
- Complaints form.

6 MONITOR AND REVIEW

6.1 Monitoring

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

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

Monitoring requirements are included in the relevant sub-plan addenda. Where relevant, the sub-plan addendum provides detail on the following:

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

Table 6-1 summarises operations monitoring requirements.

Table 6-1 Summary of monitoring requirements for the Development

Condition for reference	Monitoring Requirements	Frequency	Reference Document
Sustainability			
REMM 3B	Implementation of sustainability initiatives	Ongoing	Section 4.1
Biodiversity			
REMM 6S SSD 7709 Development Consent CoC B83	Presence of noxious and environmental weeds in landscaped areas	Ongoing	OFFMP – Addendum
Traffic			
TISEPP	Main gate monitoring (e.g. CCTV) for heavy vehicles turning right from the terminal site onto Moorebank Avenue, or	Daily and Continuous	OTAMP – Addendum



Condition for reference	Monitoring Requirements	Frequency	Reference Document
	turning left from Moorebank Avenue to the terminal site		
TISEPP	Main intersection monitoring (e.g. CCTV) to identify heavy vehicles accessing development from MAAI signalised intersection.	Daily and Continuous	OTAMP – Addendum
CoA 5	Visual monitoring of all traffic movement within MPW to detect unsafe movement of traffic and risk to persons and property	Daily and Continuous	OTAMP – Addendum
CoA 5	Turning areas, internal roads and access roads to/from Moorebank Avenue will be inspected to ensure roads remain clear and road conditions support a safe environment for all road users	Daily	OTAMP – Addendum
CoA 5	Following periods of adverse weather conditions (e.g., a significant heavy rain event), access and onsite roads will be inspected prior to heavy vehicle traffic use to maintain driver and vehicle safety	As required	OTAMP – Addendum
Noise and Vibration			
CoA 6c) (REMM 5AG and 5AJ)	Site Operational Noise Monitoring	Within 12 months of operation of the intermodal terminal facility; occupation of the first warehouse, 50% occupation of the site and 100% occupation of the site, or as otherwise agreed by the Planning Secretary	ONMP – Addendum
Air Quality			
CoA 10b) (REMM 10AH) CoC B47A of SSD 7709 Development Consent	Ambient air quality monitoring	Continuous	OAQMP – Addendum

Condition for reference	Monitoring Requirements	Frequency	Reference Document
Contamination			
CoA 9b) (REMM 9AD)	Surface and groundwater monitoring for remaining areas of environmental concern	Quarterly up until two years have elapsed after the completion of construction on the site, then subject to review	LTEMP
Greenhouse Gases			
CoA 10b) (REMM 11E)	Monitoring of energy and resource use and greenhouse gas emissions	Ongoing	Section 4.5 of MPW Stage 2 OEMP
Human Health Risks and Impacts			
REMM 17A	Review of air quality and noise monitoring	Annually	ONMP – Addendum OAQMP – Addendum
Waste			
REMM 18P	Monitoring of operational waste management practices	Six-monthly	Section 5.2.1.3

6.1.1 Interface of Operation and Construction Area

As detailed in Section 1.6, construction and operation of the Development will be progressive, and as such, operational areas will be adjacent to construction areas. The construction areas will be delineated by fencing and will be subject to the approved CEMP. The Facilities Manager should consider the construction activities occurring in proximity to the operational area when monitoring their area of responsibility. If the Facilities Manager suspects that construction activities are affecting the compliance obligations of this Addendum, they will report to the Asset Manager who should then negotiate with the Environmental Manager of the construction area in order to implement appropriate mitigation measures.

6.2 Reporting

Environmental monitoring identified in Table 6-1 and ongoing compliance with statutory requirements is required during operations. Table 6-2 provides a summary of the various reporting requirements and the frequency of submission of reports to the various regulatory authorities, including DCCEEW.

Table 6-2 Summary of reporting requirements for the Development

Condition or reference	Reporting requirements	Frequency
CoA 6) (REMM 5AG and 5AJ)	Ambient noise monitoring	Annually for up to two years after the completion of all warehouse construction

Condition or reference	Reporting requirements	Frequency
REMM 11E	Energy, resource use and greenhouse gas emissions	Annually
CoC B36(e) of SSD 7709 Development Consent	Maintenance reports, detailing the results of quarterly inspections, inspections after major rainfall events, and maintenance activities	Quarterly
CoC B36(f) of SSD 7709 Development Consent	Recording results of water quality monitoring	In accordance with the SQMP – Addendum

6.2.1 Management Review and Continuous Improvement

ESR will annually review the adequacy of the environmental and sustainability controls, procedures objectives and targets within this Addendum as detailed in Section 6.2.1 of the MPW Stage 2 OEMP. This enables ESR to determine whether the controls are still applicable to operations and to track progress against the objectives and targets.

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

Minor updates (i.e. those which comply with the statutory requirements) will be undertaken by ESR as appropriate and updates may include consultation with relevant Authorities and warehouse tenants. These changes would be reviewed and approved by the HSE Manager.

If required, an assessment will be prepared by the HSE Manager to assess a proposed change to the Development and satisfy ESR that the change is in compliance with statutory requirements, including the EPBC 2011/6086 Approval.

6.2.2 Compliance Reporting

Reporting of compliance with the EPBC 2011/6086 Approval will be undertaken annually during operations as required by CoA 19. Compliance reports will be published on the Development’s website before 21 October each year and documentary evidence of the publication and any non-compliances will be provided to DCCEEW at the same time.

6.3 Auditing and Inspections

6.3.1 Audit Requirements

Environmental and sustainability audits are to be undertaken in accordance with the EMS and CoA requirements. These audit requirements are detailed in Table 6-3. Audits will be undertaken in accordance with AS/NZS ISO 19011 – Guidelines for Auditing Management Systems. Under section 458 of the EPBC Act and CoA 20, DCCEEW may also undertake an audit or require that an independent audit is undertaken to verify compliance with the CoA.

Table 6-3 Summary of audit requirements for the Development

Condition or Reference	Audit Type	Frequency	Scope and Dissemination
EMS	Internal Compliance Audit	Annual	Audit to consider compliance with CoA Audit report must be submitted to the Minister as detailed in Section 6.2.2
CoA 20	Independent Compliance Audit	Upon the direction of the Minister	Independent auditor and audit criteria to be approved by the Minister Audit to consider compliance with CoA Audit report must address audit criteria and be submitted to the Minister
TISEPP	Traffic Audit	Where the ongoing monitoring shows heavy vehicles visiting the Development have reached the established interim thresholds of 25%, 50% and 75%	

6.3.2 Inspections

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

Table 6-4 Development inspection summary

CoC/CoA	Inspection Requirements	Focus	Frequency	Record
CoC B36(b) and (c) of SSD 7709 Development Consent	Routine checking of water quality devices in accordance with manufacturers recommendations	Stormwater	Quarterly and after major rainfall events	SIOMP – Addendum
CoC B82 of SSD 7709 Development Consent	Inspection for replacement plantings for shrubs and trees which fail at an equivalent pot size or larger	Biodiversity	Every two months	LVMP – Addendum
CoC B83(b) of SSD 7709 Development Consent	Inspect pest and weed control measures and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area	Biodiversity	Regular Basis	OFFMP – Addendum

6.4 Non-compliance, Non-conformance and Corrective Actions

6.4.1 Non-conformance

Non-conformances are observations that are not in accordance with this Addendum and/or the sub-plan addenda. 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.

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

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

6.4.2 Non-compliance

A non-compliance is defined as “an occurrence, set of circumstances, or development that is a breach of this consent”. An incident may or may not cause a non-compliance, however, if reported as an incident it does not require reporting as a non-compliance. Non-compliances may also arise where an occurrence, set of circumstances or development is considered to be in non-compliance with the EPBC 2011/6086 Approval or REMM. Incident response, classification and notification requirements are outlined in Section 4.9.

Potential non-compliances with statutory requirements, including the EPBC 2011/6086 Approval can be identified by anyone and are to be reported to the HSE Manager as a potential non-compliance.

Non-compliance with the EPBC 2011/6086 Approval will be reported in an annual compliance report as required by CoA 19. Documentary evidence providing proof of the date of publication and non-compliance with any of the CoAs must be provided to DCCEEW at the same time as the compliance report is published.

Any corrective and/or preventative actions will be recorded within the Project Corrective Actions Register and handled in accordance with the Environmental Management System – Corrective and Preventative Action. Non-compliances shall be recorded and addressed through Aconex.

All leases on site will require tenant compliance with this Addendum, including the implementation of corrective actions and reasonable directions from ESR in relation to compliance with the statutory requirements, including the EPBC 2011/6086 Approval, and the requirements of this Addendum.

APPENDIX A – DEVELOPMENT APPROVAL COMPLIANCE MATRIX

EPBC 2011/6086 Approval

The EPBC 2011/6086 Approval for the Moorebank Intermodal Terminal Project- Concept, Moorebank New South Wales was granted by DotEE (now DCCEEW) in September 2016 (No. 2011/6086) and varied on 17 September 2019. This approval was provided for the impacts on listed threatened species and communities (Sections 18 and 18A of the EPBC Act) and Commonwealth land (Sections 26 and 27A of the EPBC Act).

The operation of the Development will be consistent with the CoA of the EPBC 2011/6086 Approval. The specific CoA and the section of this Addendum, sub-plan addenda and other documents where these requirements are addressed are identified in Table A-1.

Several of the CoA refer to the REMM and further details on where the REMM applicable to operations are addressed in this Addendum, the sub-plan addenda and other documents are identified in Table A-2.

Table A-1 Compliance with relevant CoA of EPBC 2011/6086 Approval

CoA	Requirement	Reference	How Addressed
1	The person taking the action must not undertake (or permit to be undertaken) any construction activities or operations outside the development footprint as depicted in Annexure 1.	Figure 2-1	Figure 2-1 identifies the operational area for the Development. This area is wholly within the development footprint depicted within Annexure A to the EPBC 2011/6086 Approval.
4	For the protection of the environment, including listed threatened species and communities, the person taking the action must prepare an operational environmental management plan (OEMP) addressing at least the elements outlined in Conditions 5 to 13. Operations must not commence until all specified OEMP approvals have been obtained in writing, and once approved, the OEMP must be implemented. The OEMP may be prepared in stages, in which case the corresponding stage must be clearly defined, and operations of that stage must not commence until all specified approvals have been obtained in writing.	This Addendum	This Appendix A identifies which operational management plans and other documents address CoA 5 to 13.

CoA	Requirement	Reference	How Addressed
5	Sections of the CEMP and OEMP relating to traffic must be prepared by a suitably qualified expert and must:	OTAMP – Addendum	The OTAMP – Addendum was prepared by suitably qualified experts from Ason Group and Aspect Environmental.
	a) be consistent with the Traffic, Transport and Access Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	OTAMP – Addendum	The OTAMP – Addendum is consistent with Section 6.3 of the Traffic, Transport and Access Provisional Environmental Management Framework that requires that traffic management plans would be implemented as part of the OEMP.
	b) incorporate all measures 4A to 4Q from Table 7.1 of the finalised EIS that are described as ‘mandatory	OTAMP – Addendum Section 5.3 WTP – Addendum Section 3.2.4	REMM 4K applies to operations. See Table A-2. REMM 4A-4B, 4H, 4J and 4L-4P do not apply to operations.
	c) explain how all measures 4A to 4Q from Table 7.1 of the finalised EIS that are described as ‘subject to review’ have been addressed	OTAMP – Addendum Section 5.3 WTP – Addendum Sections 3.2.3 and 3.4.2	REMM 4C-4E apply to operations. See Table A-2. REMM 4F-4G, 4I and 4Q do not apply to operations.
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	The OTAMP – Addendum will be submitted to DCCEEW under CoA 21.
6	Sections of the CEMP and OEMP relating to noise and vibration must be prepared by a suitably qualified expert and must:	ONMP – Addendum	The ONMP – Addendum was prepared by suitably qualified experts from Aspect Environmental and Renzo Tonin & Associates.

CoA	Requirement	Reference	How Addressed
	a) be consistent with the Noise and Vibration Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	ONMP – Addendum Sections 4 and 5	The ONMP – Addendum is consistent with Section 6.3 of the Noise and Vibration Provisional Environmental Management Framework which details management controls to be implemented during the operation phase.
	b) incorporate all measures 5A to 5T (CEMP only) and 5U to 5AJ (OEMP only) from Table 7.1 of the finalised EIS that are described as ‘mandatory’	NA	REMM 5AI does not apply to operations
	c) explain how all measures 5A to 5T (CEMP only) and 5U to 5AJ (OEMP only) from Table 7.1 of the finalised EIS that are described as ‘subject to review’ have been addressed	ONMP – Addendum Sections 5.4 OTAMP – Addendum Appendix B	REMM 5U-5W, 5Y, 5AF-5AH and 5AJ apply to operations. See Table A-2. REMM 5X, 5Z, 5AA, 5AB and 5AD do not apply to the operation of the Development and REMM 5AC and 5AE do not apply to operations Drivers’ Code of Conduct
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	The ONMP – Addendum will be submitted to DCCEEW under CoA 21.
7	Sections of the CEMP and OEMP relating to biodiversity must be prepared by a suitably qualified expert and must:	OFFMP – Addendum	The OFFMP – Addendum was prepared by suitably qualified experts from Aspect Environmental.
	a) be consistent with the Biodiversity Provisional Environmental Management Framework (3 July 2014), provided at Appendix O to the finalised EIS	OFFMP – Addendum	The OFFMP – Addendum is consistent with Section 6.3 of the Biodiversity Provisional Environmental Management Framework

CoA	Requirement	Reference	How Addressed
			which details management controls to be implemented during the operation phase.
	b) incorporate all measures 6A to 6R, 6T, 6V and 6X from Table 7.1 of the finalised EIS that are described as ‘mandatory’	NA	REMM 6A-6I, 6K, 6O-6P, 6R, 6T, 6V and 6X do not apply to operations.
	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	NA	REMM 6J, 6M-6N and 6Q do not apply to operations.
	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	OFFMP – Addendum Section 5.2 MPW Stage 2 OFFMP Appendix E	The OFFMP – Addendum references the biosecurity protocols outlined in Appendix E of the MPW Stage 2 OFFMP.
	e) be approved by the Minister.	NA	The OFFMP– Addendum will be submitted to DCCEEW under CoA 21.
8	Sections of the CEMP and OEMP relating to contamination and soils must be prepared by a suitably qualified expert and must:	This Addendum LTEMP Appendix H of MPW Stage 2 OEMP	These documents were prepared by suitably qualified experts from EP Risk and Aspect Environmental.
	a) be consistent with the Soils and Contamination Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	NA	Section 6.3 of the Soils and Contamination Provisional Environmental Management Framework states that there are no specific management controls proposed for the operational phase of the Project.

CoA	Requirement	Reference	How Addressed
	b) incorporate all measures 7A to 7K, and 8A to 8AA, from Table 7.1 of the finalised EIS that are described as 'mandatory'	This Addendum Sections 5.2.1.3 and 5.2.1.4 OTAMP – Addendum	REMM 7A-7F and 7I-7K apply to operations. See Table A-2. REMM 7G-7H and 8A-8Z do not apply to operations.
	c) explain how all measures 7A to 7K, and 8A to 8AA, from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed	NA	REMM 8AA does not apply to operations.
	d) in relation to management of PFAS i) be consistent with: <ul style="list-style-type: none"> National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) Australian and New Zealand Guidelines for Fresh and Marine Water Quality (under the National Water Quality Management Strategy) including the draft default guideline values for perfluorooctanoic acid (PFOS) and perfluorooctane sulfonic acid (PFOA) in freshwater as applied by the state government relevant Commonwealth environmental management guidance on PFOS and PFOA ii) detail implementation and operational procedures, appropriate to the risk posed by any contamination, including: <ul style="list-style-type: none"> roles and responsibilities management of potential PFAS contaminated sites as yet un-investigated management of areas of known PFAS contamination, including strategies to reduce 	MPW PFAS Management Plan Sections 3, 6, 7, 9, 10 and 11 LTEMP Section 4	The MPW PFAS Management Plan contains sections detailing management related to this CoA. Section 3 outlines relevant legislation addressed. Section 6 outlines roles and responsibilities for management. Section 7 details the relevant mitigation measures. Section 9 details disposal and reporting. Section 10 details response to unexpected PFAS finds. Section 11 details review procedures for the plan. Section 4 of the LTEMP details contamination (including PFAS) management activities during operations.

CoA	Requirement	Reference	How Addressed
	<p>runoff, dewatering and migration of contamination across and off the proposed site</p> <ul style="list-style-type: none"> • a contingency action plan for unexpected PFAS contaminant discoveries <p>iii) detail soil, groundwater and surface water PFAS contamination monitoring requirements and testing and disposal procedures appropriate to the risk posed by any contamination</p> <p>iv) include requirements for site validation reports appropriate to the risk posed by any contamination</p> <p>v) include requirements for remedial action plans appropriate to the risk posed by any contamination</p> <p>vi) detail review procedures appropriate to the risk posed by any contamination</p> <p>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:</p> <ul style="list-style-type: none"> • contaminated sediment to be discharged outside the site of the action to be minimised • contaminated waste material, including excavated soil, to be released through dewatering to be handled appropriately to the risk posed by the contamination and disposed of in an environmentally sound manner such that potential for the PFAS content to enter the environment is minimized • contaminated waste material, including excavated soil, with a PFOS or PFOA content above 50 milligrams per kilogram (mg / kg) to be stored or disposed of in an environmentally sound manner, such that PFAS content does not enter the environment 		

CoA	Requirement	Reference	How Addressed
	<ul style="list-style-type: none"> all soil remaining at the site of the action to be suitable for purpose, 		
	e) be approved by the Minister.	NA	MPW PFAS Management Plan approved by (then DAWE) 26/10/21. LTEMP approved by (then) DAWE 26/10/21.
9	Sections of the CEMP and OEMP relating to water must be prepared by a suitably qualified expert and must:	This Addendum SQMP – Addendum SIOMP – Addendum	This Addendum, the SQMP – Addendum and the SIOMP – Addendum were prepared by suitably qualified experts from Aspect Environmental and Costin Roe Consulting.
	a) be consistent with the Water Quality, Stormwater and Flooding Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	This Addendum SQMP – Addendum SIOMP – Addendum	This Addendum the SQMP – Addendum and the SIOMP – Addendum are consistent with Section 6.1.3 of the Water Quality, Stormwater and Flooding Provisional Environmental Management Framework which details management controls to be implemented during the operation phase.
	b) incorporate all measures 9A to 9AG from Table 7.1 of the finalised EIS that are described as ‘mandatory’	SIOMP – Addendum Section 5.2 SQMP – Addendum Sections 4 and 5 LTEMP Appendix D	REMM 9X and 9AD apply to operations. See Table A-2 REMM 9A-9B, 9E-9H, 9J-9W, 9Y, 9AA-9AC and 9AG do not apply to operations.

CoA	Requirement	Reference	How Addressed
	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	SIOMP – Addendum Section 5.2	REMM 9AE applies to operations. See Table A-2 REMM 9C, 9I, 9Z and 9AF do not apply to operations.
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	This Addendum, SQMP – Addendum and the SIOMP – Addendum will be submitted to DCCEEW under CoA 21. The LTEMP was approved by (then) DAWE on 26/10/21.
10	Sections of the CEMP and OEMP relating to air quality must be prepared by a suitably qualified expert and must:	OAQMP – Addendum	The OAQMP – Addendum was prepared by suitably qualified experts from Aspect Environmental.
	a) be consistent with the Air Quality Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	OAQMP – Addendum Sections 4 and 5 OTAMP – Addendum Section 5.3	The OAQMP – Addendum and OTAMP – Addendum are consistent with Section 6.1.3 of the Air Quality Provisional Environmental Management Framework which details management controls to be implemented during the operation phase.
	b) incorporate all measures 10A to 10U (CEMP only) and 10V to 10AH and 11A to 11H (OEMP only) from Table 7.1 of the finalised EIS that are described as 'mandatory'	OAQMP – Addendum Sections 3.3 and 4.1.2 LVMP – Addendum Section 5	REMM 10W, 10Y-10AA, 10AH, 11A and 11E-11G apply to operations. See Table A-2. REMM 10AG does not apply to the operations of the Development and REMM 10V does not apply to operations.

CoA	Requirement	Reference	How Addressed
		This Addendum 4.1, 5.2.2, 6.1 and 6.3.1 MPW Stage 2 OEMP Section 4.5	
	c) explain how all measures 10A to 10U (CEMP only) and 10V to 10AH and 11A to 11H (OEMP only) from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed	OAQMP – Addendum Section 5.3	REMM 11B-11D and 11H apply to operations. See Table A-2. REMM 10AB and 10AC do not apply to the operation of the Development and REMM 10X and 10AD-10AF do not apply to operations.
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	The OAQMP – Addendum will be submitted to DCCEEW under CoA 21.
11	Sections of the CEMP and OEMP relating to Aboriginal heritage must be prepared by a suitably qualified expert and must:	This Addendum Section 5.2.1.5 Appendix H of MPW Stage 2 OEMP	This Addendum and the UFP were prepared by suitably qualified experts from Aspect Environmental.
	a) be consistent with the Aboriginal Heritage Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	This Addendum Section 5.2.1.5 Appendix H of MPW Stage 2 OEMP	This Addendum and the UFP are consistent with Section 6.3 of the Aboriginal Heritage Provisional Environmental Management Framework which details management controls to be implemented during the operation phase.
	b) incorporate all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'mandatory'	NA	REMM 12B and 12D-12G do not apply to operations.

CoA	Requirement	Reference	How Addressed
	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	NA	REMM 12A and 12C do not apply to operations.
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	This Addendum will be submitted to DCCEEW under CoA 21. The MPW Stage 2 OEMP (including the UFP) was approved by the Minister on 22/05/24.
12	Sections of the CEMP and OEMP relating to European heritage must be prepared by a suitably qualified expert and must:	This Addendum Section 5.2.1.5 Appendix H of MPW Stage 2 OEMP	This Addendum and the UFP were prepared by suitably qualified experts from Aspect Environmental.
	a) be consistent with the European Heritage Provisional Environmental Framework (2 July 2014), provided at Appendix O to the finalised EIS	This Addendum Section 5.2.1.5 Appendix H of MPW Stage 2 OEMP	This Addendum and the UFP are consistent with Section 6.4 of the European Heritage Provisional Environmental Management Framework which requires objectives to be met during the operation phase.
	b) incorporate all measures 13A to 13M from Table 7.1 of the finalised EIS that are described as 'mandatory'	NA	REMM 13C-13F and 13K-13L do not apply to operations.
	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	NA	REMM 13A-13B, 13G-13J and 13 M do not apply to operations.
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	This Addendum will be submitted to DCCEEW under CoA 21.

CoA	Requirement	Reference	How Addressed
			The MPW Stage 2 OEMP (including the UFP) was approved by the Minister on 22/05/24.
13	Sections of the CEMP and OEMP relating to visual impacts (including light spill) must be prepared by a suitably qualified expert and must:	This Addendum Section 5.2.1.1 Appendix G of MPW Stage 2 OEMP	This Addendum and Light Spill Management were prepared by suitably qualified experts from Aspect Environmental.
	a) be consistent with the Light Spill Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS	NA	Section 6.1.3 of the Light Spill Provisional Environmental Management Framework proposes management controls for lights on trains leaving the Project. This is outside of the scope of this Addendum.
	b) incorporate all measures 14A to 14H from Table 7.1 of the finalised EIS that are described as 'mandatory'	NA	REMM 14C-14D, 14F and 14H do not apply to operations.
	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	NA	REMM 14A-14B, 14E and 14H do not apply to operations.
	d) be approved by the Minister or a relevant New South Wales regulator.	NA	This Addendum will be submitted to DCCEEW under CoA 21. The MPW Stage 2 OEMP (including Light Spill Management) was approved by the Minister on 22/05/24.

CoA	Requirement	Reference	How Addressed
21	The person taking the action may choose to revise a management plan or strategy approved by the Minister under Conditions 2, 4 or 14 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised plan or strategy would not be likely to have a new or increased impact. If the person taking the action makes this choice they must:	This Addendum	This Addendum and the sub-plan addenda will be submitted for information to DCCEEW under CoA 21 as a variation to a previously approved plan. No approval of this revised plan is required.
	a) notify the Department in writing that the approved plan or strategy has been revised and provide the Department with an electronic copy of the revised plan or strategy	NA	DCCEEW will be notified and electronic copies of this Addendum and the sub-plan addenda will be submitted.
	b) implement the revised plan or strategy from the date that the plan or strategy is submitted to the Department	Sections 4 and 5	Sections 4 and 5 outline the responsibilities for the implementation of this Addenda and the sub-plan addenda during the operation of the Development.
	c) for the life of this approval, maintain a record of the reasons the approval holder considers that taking the action in accordance with the revised plan or strategy would not be likely to have a new or increased impact.	NA	The notification submitted to DCCEEW under CoA 21b) will document these reasons and will be maintained as a record for the Development.
	Note: Condition 21 does not affect any obligation to consult or seek approval from a relevant New South Wales regulator when revising a management plan or strategy.	NA	This Addendum and sub-plan addenda do not require approval from the NSW regulator.

Revised Environmental Management Measures

Several of the EPBC 2011/6086 Approval CoA refer to the REMM and further detail on where the REMM applicable to operations are addressed in this addendum, the sub-plan addenda and other documents are identified in Table A-2. Note that REMM not related to operations (i.e. related to detailed design, early works and/or construction) have not been included in this table.

Table A-2 Compliance with relevant REMM

REMM	Requirement	Reference	Comments
Traffic			
4C	Install a variable message signage system within the Project site to direct heavy vehicles and facilitate safe and efficient access and navigation.	OTAMP – Addendum Section 5.3	Management measures TA4-TA8 and TA19 (in Table 5-2) of the OTAMP – Addendum describe a variable message signage system that will be implemented as part of the overall signage strategy.
4D	Consider the provision of pedestrian and cyclist connections from Moorebank Avenue into the Project site.	OTAMP – Addendum Section 5.3 WTP – Addendum Sections 3.2.3 and 3.2.4	Management measures TA16 and TA17 (in Table 5-2) of the OTAMP – Addendum provide that during interim operations, pedestrian access would continue to be managed by construction contractors consistent with the Construction Traffic and Access Management Plan (CTAMP). For ultimate operations, pedestrian access will be provided as detailed in Sections 3.2.3 and 3.2.4 the WTP – Addendum.
4E	Consider the provision of staff storage and shower areas to promote cycling, jogging and walking as modes of transport.	OTAMP – Addendum Section 5.3	Management measures TA2 and TA3 (in Table 5-2) of the OTAMP – Addendum require that end-of-trip facilities will be provided in warehouses.

REMM	Requirement	Reference	Comments
		WTP – Addendum Section 3.4.2	
Traffic Management Plans			
4K	In addition to the Community Engagement Plan (or equivalent) (Refer to 2A), a communication plan will be developed to provide information to the relevant authorities and bus operators in addition to the local community. The communication plan will need to incorporate a contact list with the chain of command.	OTAMP – Addendum Section 5.3 WTP – Addendum Section 3.2.4	Management measure TA21 (in Table 5-2) of the OTAMP – Addendum notes that the location of bus stops on Moorebank Avenue have been agreed with operators following consultation.
Operations Noise and Vibration			
5U	<p>To achieve the noise reductions outlined in Table 7.30 of the Response to Submissions report and the Revised Project Noise and Vibration Impact Assessment report in Appendix F, mitigation treatments may be required to reduce noise from all dominant noise sources. The Project would implement reasonable and feasible noise mitigation to control potential noise levels. In the event that the Project does not meet the assessment criteria at receptors, if the Project has reduced noise levels to be as low as practicable, the NSW Industrial Noise Policy (INP) (EPA 2000b) notes that:</p> <ul style="list-style-type: none"> achievable noise limits can be negotiated with regulators and the community; and the Project specific noise mitigation measures and noise levels outlined in Table 7.30 of this report and in the Noise and Vibration Assessment (Appendix F) should not automatically be interpreted as conditions for approval without consideration of other factors (environmental, social and economic) consistent with the objectives of the EP&A Act. In this regard, where appropriate, the 	ONMP – Addendum Sections 5.2 and 5.4	Table 5-2 and Table 5-3 of the ONMP – Addendum include further assessment and monitoring to capture actual noise performance.

REMM	Requirement	Reference	Comments
	INP notes that noise limits can be set above the Project specific noise levels.		
5V	Where practical operational plant and equipment would be selected to reduce noise emissions.	ONMP – Addendum Section 5.4	Management measures N14 and N15 (in Table 5-3) of the ONMP – Addendum include use of quieter plant, fitting and maintaining noise reduction packages on plant and equipment where feasible and reasonable.
5W	Mechanical components on fixed and mobile equipment, such as motors, gearboxes and exhausts, would include enclosures and acoustic insulation (lagging) (as necessary) to limit noise emissions.	ONMP– Addendum Section 5.4	Management measure N15 (in Table 5-3) of the ONMP – Addendum includes fitting and maintaining noise reduction packages on plant and equipment where feasible and reasonable.
5X	Where feasible, motors and mechanical noise-generating components of the rail mounted gantries (RMGs) would be located near to ground level rather than at the top of the gantry.	NA	No RMGs have been provided for the Development.
5Y	Where reasonable and feasible, and where it would produce a lower noise emission, electric motors would be operated instead of diesel powered equipment.	OAQMP – Addendum Section 5.3 ONMP – Addendum Section 5.4	Management measures AQ16 and AQ16 (in Table 5-1) of the OAQMP – Addendum and N14 (in Table 5-3) of the ONMP – Addendum include electrical equipment being used rather than diesel equipment.
Operational Noise Management			
5AF	Before the start of each phase of operations, an operational noise and vibration management plan (ONVMP) (or equivalent) would be developed and implemented. The ONVMPs would detail the operation of the relevant Project phase, the potential offsite operational noise	ONMP – Addendum Section 5.4	Section 5.4 of the ONMP – Addendum includes further assessment and monitoring to capture actual noise performance.

REMM	Requirement	Reference	Comments
	levels as determined during the detailed design process, and all measures to manage and mitigate operational noise and vibration.		
5AG	<p>As a minimum, the ONVMP (or equivalent) would include:</p> <ul style="list-style-type: none"> the operational noise criteria/limits as defined by the relevant Project approvals and Environmental Protection Licence; identification of all surrounding receptors and land use that would be potentially sensitive to noise and vibration; identification of all noise and vibration generating operations and the timing of these operations; the location and specification of any onsite and offsite noise mitigation, including the requirement for future mitigation as part of the staged operation; detailed measures for managing operational noise, including checklist and auditing procedures to ensure measures are implemented before the start of noise generating activity; procedures for the monitoring and reporting of operational noise and vibration; procedures for consultation with the community regarding operational noise and vibration; and complaint handling procedures. 	ONMP – Addendum Sections 5 and 6	The requirements of this condition are addressed throughout Sections 5 and 6 of the ONMP – Addendum.
5AH	<p>During detailed design, where practical and feasible to do so, consideration would be given to:</p> <ul style="list-style-type: none"> undertaking locomotive maintenance during the daytime and evening period between 7.00 am and 10.00 pm; 	<p>ONMP – Addendum Section 5.4</p> <p>OTAMP – Addendum Appendix B</p>	Management measures N8 and N9 (in Table 5-3) of the ONMP – Addendum includes minimising use of reversing alarms by providing forward manoeuvring where practicable. The implementation of broadband reversing alarms for permanent and tenant

REMM	Requirement	Reference	Comments
	<ul style="list-style-type: none"> operating heavy vehicles to limit the requirement for reversing and audible reversing alarms; and appropriate management measure – either contractual or operational – that rail operators accessing the site would be required to undertake regular maintenance of all trains to address wheel flat spots and locomotive exhausts. 		<p>owned/controlled vehicles, where feasible and reasonable.</p> <p>Rail related items not applicable to the Development.</p> <p>The Drivers' Code of Conduct defines acceptable behaviour and procedures for heavy vehicle drivers.</p>
Noise and Vibration Monitoring			
5AJ	<p>The ambient noise monitoring surveys within Casula, Wattle Grove and Glenfield would be continued throughout the construction and operation of the Project (with annual reporting of noise results up to two years beyond the completion of Full Build). The noise surveys would quantify any potential noise from the Project and identify any trends/changes in the ambient noise environment during the progressive development.</p> <p>The measured noise levels and contribution from the operation of the Project would be continually applied to the detailed design of the Project to ensure it includes appropriate mitigation measures to reduce and control noise during construction and operation. The monitoring data would also include any changes to the ambient noise environment from new or changed developments in the area.</p> <p>In the event of any noise or vibration related complaint or adverse comment from the community, noise and ground vibration levels would be measured at the potentially affected premises, where reasonable and feasible. In accordance with procedures in the CNVMP and ONVMP, the measured noise and/or vibration levels would then be assessed to ascertain if remedial action is required</p>	<p>ONMP – Addendum Sections 5.4, 6.4, 6.5 and 6.6</p>	<p>These sections of the ONMP – Addendum detail noise monitoring (including ambient noise monitoring), reporting and response to exceedances, complaints and non-compliances related to noise management levels identified during monitoring.</p>

REMM	Requirement	Reference	Comments
Hazards and Risks			
7A	<p>To minimise the risk of leakages involving natural gas, liquid natural gas (LNG) and flammable and combustible liquids to the atmosphere:</p> <ul style="list-style-type: none"> • appropriate standards for a gas reticulation network, including AS 2944-1 (2007) and AS 2944-2 (2007), would be referred to in the detailed design process; • correct schedule pipes would be used; • a fire protection system would be installed if necessary for gas users; • cathodic protection would be installed for external corrosion if appropriate; and • access to the Project site would be secure. 	NA	At this stage, warehouse tenants are unknown and the use and/or storage of these materials at the Development has not been determined.
7B	<p>To minimise the risks of leakage of LNG and liquid petroleum gas (LPG) and flammable liquids during transport:</p> <ul style="list-style-type: none"> • materials would be transported according to the Australian Dangerous Goods (ADG) Code, relevant standards and regulations; and • contractors delivering the gas would be trained, competent and certified by the relevant authorities. 	NA	At this stage, warehouse tenants are unknown and the transport of these materials to/from the Development has not been determined.
7C	<p>To minimise hazards associated with venting of natural gas, LNG and LPG:</p> <ul style="list-style-type: none"> • LNG storage would be designed to AS/NZS 1596-2008 standards; • access to the Project site would be secure; and 	NA	At this stage, warehouse tenants are unknown and the use and/or storage of these materials at the Development has not been determined.

REMM	Requirement	Reference	Comments
	<ul style="list-style-type: none"> significant separation distances to residences and other assets would be put in place. 		
7D	Storage of flammable/combustible liquids would be carried out in accordance with AS 1940, with secondary containment in place and location away from drainage paths.	NA	At this stage, warehouse tenants are unknown and the use and/or storage of these materials at the Development has not been determined.
7E	Standby or emergency generators and transformers would all have secondary containment.	NA	Addressed during detailed design and construction, with no ongoing management required during operation.
7F	Oil coolers would generally be located in areas where leaks and runoff are appropriately controlled at source or in a retention basin.	NA	Addressed during detailed design and construction, with no ongoing management required during operation.
7I	No hazardous or regulated wastes would be disposed of onsite.	This Addendum Section 5.2.1.3	This section addresses how waste will be disposed of in accordance with the POEO Act, <i>Waste Avoidance Resource Recovery Act 2001</i> and the EPA's NSW Waste Avoidance and Resource Recovery Strategy 2014-2021 and other requirements.
7J	All offsite disposals would be carried out by approved transport operators and to approved facilities.	This Addendum Section 5.2.1.3	Section 5.2.1.3 of this Addendum addresses how waste will be disposed of in accordance with the POEO Act, <i>Waste Avoidance Resource Recovery Act 2001</i> and the EPA's NSW Waste Avoidance and Resource Recovery Strategy 2014-2021 and other requirements.

REMM	Requirement	Reference	Comments
7K	Other dangerous goods, including any waste materials present on the Project site, would be suitably contained, with secondary containment and runoff controls implemented where appropriate to prevent leaks or spills migrating to environmentally sensitive areas, in particular via stormwater systems that drain to the Georges River.	This Addendum Section 5.2.1.3	At this stage, warehouse tenants are unknown and the use and/or storage of dangerous goods at the Development has not been determined. Section 5.2.1.3 of this Addendum addresses how wastes will be managed in accordance with the relevant statutory requirements.
Onsite Stormwater and Surface Water Quality			
9X	A stormwater treatment system would be implemented, incorporating sedimentation and bio-filtration basins upstream of the stormwater detention basins.	SIOMP – Addendum Section 5.2 SQMP – Addendum Sections 4 and 5	Section 5.2 of the SIOMP – Addendum describes the stormwater treatment system (including gross pollutant traps and biofiltration/bioretenion basins) constructed for the Development. Sections 4 and 5 of the SQMP – Addendum outline monitoring requirements to assess the efficacy of the stormwater system in treating stormwater runoff from the Development during operations.
Groundwater			
9AD	Suitable groundwater monitoring where required would be established and undertaken before construction, during construction and during operation of the Project.	LTEMP Appendix D	LTEMP Appendix D EMP18 outlines the groundwater monitoring required during (construction and) operations.
9AE	To prevent the contamination of groundwater during Project construction and operation, suitable water treatment, water retention,	SIOMP – Addendum Section 5.2	Section 5.2 of the SIOMP – Addendum details the surface water management system and its maintenance requirements.

REMM	Requirement	Reference	Comments
	water proofing and ground treatments would be investigated and implemented where required.		
Air Quality – Operation			
10W	Manage Project site traffic to minimise the possibility of trucks queueing along public roads adjacent to the Project site. This can be achieved through the implementation and enforcement of an idling limit for trucks on site and provision for a troubled truck parking area.	OAQMP – Addendum Section 5.3	Management measures AQ1, AQ2, AQ5, AQ11 and AQ16 (in Table 5-1) of the OAQMP – Addendum address potential truck queueing.
10Y	Optimise the use of trucks capable of transporting multiple TEU containers simultaneously to achieve maximum efficiency onsite and reduce air emissions.	OAQMP – Addendum Section 5.3	Management measures AQ11 and AQ12 (in Table 5-1) of the OAQMP – Addendum address onsite efficiency.
10Z	Vehicles would be maintained to not release excessive levels of smoke from the exhaust and to be compliant with OEH's Smokey Vehicles Program under the POEO Act and POEO Regulations.	OAQMP – Addendum Section 5.3	Management measures AQ6, AQ7, AQ8 and AQ9 (in Table 5-1) of the OAQMP – Addendum address smoky vehicles.
10AA	Emissions from the operators' trucks would be regulated by the NEPM (Diesel Vehicle Emissions) (NEPC 2001).	OAQMP – Addendum Section 5.3	Management measures AQ5-AQ11 (in Table 5-1) of the OAQMP – Addendum address exhaust from diesel trucks.
10AB	Emissions from locomotives would follow international standards, such as those provided for under United States legislation 'Final Rule: Control of Emissions of Air Pollution from Locomotives and Marine Compression-Ignition Engines Less Than 30 Litres per Cylinder' (US EPA 2012) and should meet the Tier 2+ or above emission standard for all new locomotives entering the Project site (No emission standards are available under the NSW or Federal legislative framework for locomotives).	NA	Not relevant to the operation of the Development.

REMM	Requirement	Reference	Comments
10AC	Emissions from shunting engines would follow international standards, such as those provided for under United States legislation 'Final Rule: Control of Emissions of Air Pollution from Locomotives and Marine Compression-Ignition Engines Less Than 30 Litres per Cylinder' (US EPA 2012) and should meet the Tier 2+ or above emission standard. Older locomotives should be upgraded to meet Tier 1 or Tier 2+ emission standards where reasonable and feasible. (No emission standards are available under the NSW or Federal legislative framework for shunting engines).	NA	Not relevant to the operation of the Development.
Odours			
10AG	<p>Odour emissions would be controlled through the implementation of best management practice (BMP). The following mitigation measures and safeguards are recommended for the operational works:</p> <ul style="list-style-type: none"> • providing covering for inlet works; • extraction of inlet works foul air gases to a soil bed filter for treatment; and • contingencies in place for potential loss of aeration (backup generator for power supply and storage of lime for dosing to the process units in the event that anaerobic conditions occur). 	NA	Not relevant to the operation of the Development.
Future Monitoring			
10AH	<p>It is also proposed that ambient air quality monitoring be undertaken as part of the Project's construction phase right through to operation. This would include:</p> <ul style="list-style-type: none"> • onsite monthly dust deposition monitoring during construction to measure dust fallout from the Project at boundary points and 	OAQMP – Addendum Section 6.1	Section 6.1 (Table 6-1) of the OAQMP – Addendum details the ambient air quality monitoring required during operations.

REMM	Requirement	Reference	Comments
	<p>selected sensitive receiver locations. This would include comparison of concentrations with the air quality criteria; and</p> <ul style="list-style-type: none"> annualised average monitoring after operations commence to ensure that the ambient air quality criteria are met. 		
Greenhouse Gases			
11A	Where possible, establish and maintain areas of native flora and vegetation within the Project site to generate significant carbon sequestration benefits.	LVMP – Addendum Section 5	Section 5 of the LVMP – Addendum describes the landscape planting on the Development site and its maintenance.
11B	Where possible, implement the use of biofuels (e.g. biodiesel, ethanol, or blends such as E10 and B880) to reduce GHG emissions from plant and equipment.	OAQMP – Addendum Section 5.3	Management measure AQ5 (in Table 5-1) of the OAQMP – Addendum addresses the use of low GHG emission fuels.
11C	Consider the use of vehicles with minimum GHG emissions ratings of 7.5 for passenger vehicles and 6 for light commercial vehicles, as described in the Green Vehicle Guide (http://www.greenvehicleguide.gov.au/GVGPublicUI/home.aspx).	OAQMP – Addendum Section 5.3	Management measure AQ5 (in Table 5-1) of the OAQMP – Addendum addresses the use of low GHG emission fuels.
11D	Energy-efficient guidelines for operational work, such as minimal idling time for machinery or complete shut off, would be considered and implemented where appropriate.	OAQMP – Addendum Section 5.3	Management measure AQ4 (in Table 5-1) of the OAQMP – Addendum addresses plant and equipment idling.
11E	Establish an Environmental Management System (EMS) that involves regular monitoring, auditing and reporting on energy, resource use and GHG emissions from all relevant activities; include energy audits with a view to progressively improving energy efficiency and investigation of renewable energy sources (e.g. onsite solar generation), where feasible.	This Addendum Sections 4.1, 5.2.2 and 6.1 MPW Stage 2 OEMP Section 4.5	Section 4.1 of this Addendum outlines the LOGOS EMS. Section 5.2.2 of this Addendum lists environmental forms, including an energy consumption register.

REMM	Requirement	Reference	Comments
			<p>Section 6.1 of this Addendum (Table 6-1) includes requirement for monitoring of energy and GHG emissions.</p> <p>Section 4.5 of the MPW Stage 2 OEMP (Table 4 1) includes energy use reporting and monitoring.</p>
11F	Investigate methods to reduce losses from industrial processes (refrigerants and SF6).	NA	At this stage, warehouse tenants are unknown and the use of these materials at the Development has not been determined.
11G	Investigate and, where possible, implement key performance indicators (KPIs) for plant efficiency and GHG intensity.	MPW Stage 2 OEMP Section 4.5	Section 4.5 of the MPW Stage 2 OEMP (Table 4-1) includes targets for energy monitoring and renewable energy use.
11H	Consider and implement, where possible, the mitigation options for further reducing energy and GHG emissions detailed in Table 9.4 in Section 9 – Project sustainability.	NA	<p>The initiatives listed have been considered for the Development and in many cases implemented. Examples relevant to operations include:</p> <ul style="list-style-type: none"> • Water sensitive urban design principles incorporated into landscape design • Installation of PV panels on warehouse roofs • Establishment of conservation zone and revegetation of riparian zone.

EP&A Act Development Consents

The MPW Concept and Stage 1 (SSD 5066) Development Consent was granted on 3 June 2016 (and modified on 30 October 2019 and 24 December 2020). The CoC under Schedule 2 (Terms of Approval) are potentially relevant to the operation of the Development.

The operation of the Development will be consistent with the CoC of the SSD 5066 Development Consent. The specific CoC and the section of this Addendum, sub-plan addenda and other documents where these requirements are addressed are identified in Table A-3.

The MPW Stage 2 (SSD 7709) Development Consent was approved on 11 November 2019 by the NSW Independent Planning Commission (IPC) and subsequently reissued by the NSW Land and Environment Court on 24 December 2021. The SSD 7709 Development Consent was modified by the IPC on 24 December 2020 and 30 September 2021.

The SSD 7709 Development Consent defines the MPW Stage 2 Site to include the area of the Development. Therefore, CoC that refer to the “site” may apply to operation of the Development and this Addendum. The specific CoC and the section of this Addendum, sub-plan addenda and other documents where these requirements are addressed are identified in Table A-4.

Table A-3 MPW Concept and Stage 1 (SSD 5066) CoC requirements

CoC	Requirement	Reference	Comment
Development Description			
1	Except as amended by the conditions of this consent, development consent is granted only to the Concept Proposal and Early Works as described in Schedule 1 and the Environmental Impact Statement dated October 2014, as amended by the Response to Submissions, dated May 2015 (as further amended by the Supplementary Response to Submissions dated August 2015), subsequent modifications as outlined in Condition 4 below and the conditions contained in this development consent.	This Addendum Section 2	The Development is consistent with the requirements of the approved MPW Concept.

CoC	Requirement	Reference	Comment
Development in Accordance with Plans and Documents			
4	<p>The applicant shall carry out the development generally in accordance with the:</p> <ul style="list-style-type: none"> a) Environmental Impact Statement titled Moorebank Intermodal Terminal Project Environmental Impact Statement, prepared by Parsons Brinckerhoff Australia Pty Limited, dated October 2014; b) Response to Submissions report titled, Moorebank Intermodal Terminal Response to Submissions Report, prepared by Parsons Brinckerhoff Australia Pty Limited, dated May 2015; c) Supplementary Submissions report titled, Moorebank Intermodal Terminal Supplementary Response to Submissions Report, prepared by Parsons Brinckerhoff Australia Pty Limited, dated August 2015; and d) MOD 1 Report titled, Moorebank Precinct West Intermodal Terminal Facility Concept Plan Approval (SSD 5066) Modification, prepared by Arcadis, dated June 2016; e) MOD 1 Response to Submissions report titled, Moorebank Precinct West – Concept Modification Response to Submissions – SSD 5066 MOD 1, prepared by Arcadis, dated December 2016; f) MOD 1 Supplementary Response to Submission report titled, Moorebank Precinct West – Concept Modification Supplementary Response to Submissions – SSD 5066 MOD 1, prepared by Arcadis, dated August 2017; and g) the conditions of this consent. 	This Addendum Section 2	The Development is consistent with the requirements of the approved MPW Concept.
Limits of Approval			
15	The warehousing and distribution facilities must only be used for activities associated with freight using the intermodal terminal facility unless otherwise approved in a subsequent Development Application.	This Addendum Section 2	The Development is consistent with the requirements of the approved MPW Concept.

CoC	Requirement	Reference	Comment
Traffic			
E12	All future Development Applications must include adequate measures to prevent heavy vehicles associated with the construction or operation of the facility from using Cambridge Avenue.	OTAMP – Addendum Sections 5.1 and 5.3 and Appendix C	Figure 5-1 and management measure TA1 (in Table 5-2) of the OTAMP – Addendum provide for heavy vehicle access to and from the Development site and does not include use of Cambridge Avenue. The Drivers' Code of Conduct (Appendix C of the OTAMP – Addendum) describes responsibilities of heavy vehicle drivers including the use of the designated routes.
E14	All future Development Applications shall consider the need for a bus stop on Moorebank Avenue (including direct pedestrian access from the warehousing to the bus stop), and associated turnaround facility suitable for a 14.5-metre-long non-rear steer bus.	WTP – Addendum Section 3.2.4	Direct pedestrian access from warehousing to the bus stop on Moorebank Avenue has been considered in Section 3.2.4.

Table A-4 MPW Stage 2 (SSD 7709) site-wide CoC requirements

CoC	Requirement	Reference	Comment
Stormwater Infrastructure Operation and Maintenance Plan			
B36	<p>Prior to commencement of operation, the Applicant must prepare a Stormwater Infrastructure Operation and Maintenance Plan to manage the operation and maintenance of stormwater infrastructure on-site and off-site, to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required under Condition C5 and must be implemented for the life of the assets and must include provision for:</p> <ul style="list-style-type: none"> (a) the management and maintenance of the assets, including evidence that a maintenance contract is in place with a reputable and experienced maintenance contractor; (b) quarterly inspections, and inspections after major rainfall events including scour/ bank protection structures; (c) schedule for routine checking (at least quarterly), cleaning and servicing of all water quality devices/ systems in accordance with the manufacturer's and/ or designer's recommendations; (d) maintenance of records of all maintenance activities undertaken; (e) preparing quarterly maintenance reports, detailing the results of quarterly inspections, inspections after major rainfall events, and maintenance activities; (f) recording results of water quality monitoring required under Condition B38; (g) investigation, management and mitigation of water quality target exceedances; (h) requiring annual independent auditing; and (i) procedures for submission of the quarterly maintenance reports and annual independent audit reports to the Planning Secretary, including the results of inspections, management and maintenance actions and water quality monitoring. 	SIOMP – Addendum	The SIOMP – Addendum addresses these requirements for the operation of the Development, where relevant.

CoC	Requirement	Reference	Comment
Prevention of Odours			
B47A	<p>Prior to the commencement of operation of the MPW development, the Applicant must prepare an Operational AQMP (AQMP) for the entire precinct (MPE + MPW) and submit for the approval of the Planning Secretary. The Applicant may submit a plan approved under an approval for the MPE site, provided it is amended to apply to and address air quality impacts of the MPW development. The AQMP must be prepared by a suitably qualified person(s) and must form part of the OEMP required by condition C5. The AQMP must demonstrate how the development would comply with the conditions of consent, and include:</p> <ul style="list-style-type: none"> (a) identification of sources and quantify airborne pollutants; (b) best practise reactive and proactive control measures that will be implemented for each emission source; (c) provisions for the implementation of additional measures in response to issues identified during monitoring and reporting; (d) for all emission sources associated with site operations; <ul style="list-style-type: none"> (i) key performance indicator(s); (ii) monitoring method(s); (iii) location, frequency and duration of monitoring; (iv) recording keeping; (v) complaints register; (vi) response procedures; and (vii) compliance monitoring. (e) phased conversion to reach stackers of Tier 4 standard for particle emissions (or equivalent standard that is satisfactory to the Secretary) at the MPW Site within ten years of first operation of the Site. 	OAQMP – Addendum	The OAQMP – Addendum addresses these requirements for the operation of the Development, where relevant.

CoC	Requirement	Reference	Comment
Pest and Weed Control			
B83	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) implement measures to manage pests, vermin and declared noxious weeds on the site; and (b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area. <p>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Biosecurity Act 2015.</p>	<p>LVMP – Addendum Section 5</p> <p>OFFMP – Addendum Section 5.4</p>	<p>The LVMP – Addendum and OFFMP – Addendum address these requirements for the operation of the Development, where relevant.</p>
Traffic and Access			
B93	<p>The development is to be designed and operated so that:</p> <ul style="list-style-type: none"> (a) all vehicles are wholly contained on site before being required to stop; (b) adequate parking for heavy vehicles is provided on-site to accommodate any potential delays in schedule time; (c) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site; (d) all loading and unloading of materials is carried out on-site; and (e) site roads accommodate buses, bus infrastructure and cyclist use for employees. 	<p>OTAMP – Addendum Section 5.3</p> <p>WTP – Addendum Sections 3.2.3, 3.2.4 and 3.4.2</p>	<p>Management measures TA15, TA18 and TA20 (in Table 5-2) of the OTAMP – Addendum address these requirements for the operation of the Development, where relevant.</p> <p>Management measures WT4, WT5, WT6, WT7 and WT9 (in Table 3-2) of the WTP – Addendum addresses the requirements for buses and cyclists for the Development.</p>
Operational Traffic and Access Management Plan			
B119	<p>The OTAMP must form part of the OEMP and, in addition to the general management plan requirements listed in Conditions C5 and C6, the OTAMP must:</p>	<p>OTAMP – Addendum</p>	<p>Management measures TA8-TA14 (in Table 5-2) of the OTAMP – Addendum address these requirements for the</p>

CoC	Requirement	Reference	Comment
	<ul style="list-style-type: none"> (a) detail numbers and frequency of truck movements, sizes of trucks, vehicle routes and hours of operation; (b) detail access arrangements for the site to ensure road and site safety, and demonstrate there will be no queuing on the road network; (c) detail measures to ensure turning areas and internal access roads are kept clear of any obstacles, including parked cars, at all times; and (d) set out a framework and procedures for data collection required to prepare the Biannual Trip Origin and Destination Report required under Condition B120 including a main gate monitoring system (e.g. CCTV) to identify heavy vehicles turning right from the terminal site onto Moorebank Avenue, or turning left from Moorebank Avenue to the terminal site. 		operation of the Development, where relevant.
Intermodal Terminal Operational Noise Limits			
B131	The noise generated by the development must not exceed the noise limits in Table 4 which are generated by the overall precinct operations (defined as all activities approved for MPW and MPE).	ONMP – Addendum Sections 5.2 and 5.4	Management measures (Table 5-3) of the ONMP – Addendum were developed in consideration of the cumulative noise generated by the operations of the Development and other parts of the MIP.

CoC	Requirement	Reference	Comment																									
	<p>Table 4: Operational Noise Limits dB(A)</p> <table border="1"> <thead> <tr> <th>Location (residential receivers)</th> <th>Day <u>L_{Aeq,15 minute}</u></th> <th>Evening <u>L_{Aeq,15 minute}</u></th> <th>Night <u>L_{Aeq,15 minute}</u></th> <th>Night <u>LAFmax Sleep Arousal Screening Level</u></th> </tr> </thead> <tbody> <tr> <td><u>Casula</u></td> <td><u>46 dB</u></td> <td><u>44 dB</u></td> <td><u>39 dB</u></td> <td><u>52 dB</u></td> </tr> <tr> <td><u>Glenfield</u></td> <td><u>49 dB</u></td> <td><u>46 dB</u></td> <td><u>42 dB</u></td> <td><u>52 dB</u></td> </tr> <tr> <td><u>Wattle Grove</u></td> <td><u>44 dB</u></td> <td><u>42 dB</u></td> <td><u>42 dB</u></td> <td><u>52 dB</u></td> </tr> <tr> <td><u>Wattle Grove North</u></td> <td><u>41 dB</u></td> <td><u>41 dB</u></td> <td><u>41 dB</u></td> <td><u>52 dB</u></td> </tr> </tbody> </table> <p>Notes: <u>To determine compliance with the L_{Aeq,15 minute} noise limits, noise from the development is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 m of a dwelling where the dwelling is more than 30 m from the boundary. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see Chapter 7 of the NPI). The modification factors in Fact Sheet C of NPI must also be applied to the measured noise levels where applicable.</u></p> <p><u>To determine compliance with the LAFmax Sleep Arousal Screening Level in Table 4 above, noise from the project is to be measured at 1 m from the dwelling façade. Where it can be demonstrated that direct measurement of noise from the project is impractical, the EPA may accept alternative means of determining compliance (see Chapter 7 of the NPI).</u></p> <p><u>The noise emission limits identified above apply under meteorological conditions of:</u></p> <p><u>(i) wind speeds of up to 3 m/s at 10 m above ground level; or</u></p> <p><u>(ii) 'F' atmospheric stability class.</u></p>	Location (residential receivers)	Day <u>L_{Aeq,15 minute}</u>	Evening <u>L_{Aeq,15 minute}</u>	Night <u>L_{Aeq,15 minute}</u>	Night <u>LAFmax Sleep Arousal Screening Level</u>	<u>Casula</u>	<u>46 dB</u>	<u>44 dB</u>	<u>39 dB</u>	<u>52 dB</u>	<u>Glenfield</u>	<u>49 dB</u>	<u>46 dB</u>	<u>42 dB</u>	<u>52 dB</u>	<u>Wattle Grove</u>	<u>44 dB</u>	<u>42 dB</u>	<u>42 dB</u>	<u>52 dB</u>	<u>Wattle Grove North</u>	<u>41 dB</u>	<u>41 dB</u>	<u>41 dB</u>	<u>52 dB</u>		
Location (residential receivers)	Day <u>L_{Aeq,15 minute}</u>	Evening <u>L_{Aeq,15 minute}</u>	Night <u>L_{Aeq,15 minute}</u>	Night <u>LAFmax Sleep Arousal Screening Level</u>																								
<u>Casula</u>	<u>46 dB</u>	<u>44 dB</u>	<u>39 dB</u>	<u>52 dB</u>																								
<u>Glenfield</u>	<u>49 dB</u>	<u>46 dB</u>	<u>42 dB</u>	<u>52 dB</u>																								
<u>Wattle Grove</u>	<u>44 dB</u>	<u>42 dB</u>	<u>42 dB</u>	<u>52 dB</u>																								
<u>Wattle Grove North</u>	<u>41 dB</u>	<u>41 dB</u>	<u>41 dB</u>	<u>52 dB</u>																								
Operational Flora and Fauna Management																												
B160	<p>Prior to commencement of operation an Operational Flora and Fauna Management Plan (OFFMP) must be prepared by a suitably qualified person in consultation with OEH and be submitted to the Planning Secretary for approval. The OFFMP must include:</p> <p>(a) monitoring, management and maintenance procedures for koala habitat corridors; and</p> <p>(b) management and maintenance of other measures and site operations to minimise the risk of harm to koalas and other native fauna.</p>	OFFMP – Addendum Section 6	The OFFMP – Addendum addresses these requirements for the operation of the Development, where relevant.																									

CoC	Requirement	Reference	Comment
Hazards and Risks			
B178	Fuel stored on the site must only be used for the purposes of refuelling IMT facility plant and equipment and locomotives.	NA	At this stage, warehouse tenants are unknown and the storage of fuels at the Development has not been determined.
Waste Management			
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.	This Addendum	Section 5.2.1.3 of this Addendum addresses these requirements.
Operation of Plant and Equipment			
B188	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	OAQMP – Addendum Section 5.3 ONMP – Addendum Section 5.4	Management measure AQ7 (in Table 5-1) of the OAQMP – Addendum and management measure N13 (in Table 5-1) of the ONMP – Addendum address these requirements for the operation of the Development.

Complying Development Certificate

CDC 230736/01 was issued by the Certifier for the construction and operations of the Development under the TISEPP on 27 February 2024. The CDC included conditions consistent with those required under Part 2 of Chapter 6 of the TISEPP and no additional conditions were included. Nonetheless, the CDC included conditions relevant to the operation of the Development and this Addendum.

The operation of the Development will be consistent with the conditions of CDC 230736/01. The specific conditions and the section of this Addendum, sub-plan addenda and other documents where these requirements are addressed are identified in Table A-5.

Table A-5 CDC 230736/01 requirements

Condition	Requirement	Reference	Comment
17	<p>Development on land containing containment cell</p> <p>(1) This section applies to complying development carried out on land containing a containment cell if the development is likely to—</p> <p>(a) cause the cell to be breached or otherwise damaged, or</p> <p>(b) reduce the effectiveness of the cell.</p> <p>(2) A plan that provides for the following must be prepared and approved by a site auditor before the development commences—</p> <p>(a) the management of the construction process relating to a breach of or damage to the containment cell, including how exposed contaminated material will be dealt with,</p> <p>(b) the process for reinstating the containment cell before the development is completed.</p> <p>(3) The plan, including the reinstatement of the containment cell, must be complied with.</p> <p>(4) The land on which the development is carried out must not be used for the purpose of the development unless—</p> <p>(a) a site audit report and site audit statement are obtained from a site auditor before the development is completed, and</p> <p>(b) the report and statement indicate that the site is suitable for the intended use.</p> <p>(5) In this section— <i>site audit report, site audit statement and site auditor</i> have the same meaning as in the <i>Contaminated Land Management Act 1997</i>.</p>	LTEMP	The LTEMP addresses these requirements for the operation of the Development.

Condition	Requirement	Reference	Comment
20	<p>Emergency facilities</p> <p>Fire watch measures must be implemented during a period in which work on existing alarm signalling equipment results in a loss of a monitoring service.</p>	<p>This Addendum Section 5.2.1.6</p>	<p>Section 5.2.1.6 of this Addendum addresses this requirement.</p>

APPENDIX B – DEVELOPMENT PERMITS AND LICENCES REGISTER

Table B-1 Development permits and licences register

License/Permit	Requirement	Commencement Date	Expiry Date	Responsibility
Biodiversity				
<i>Biosecurity Act 2015 (Noxious Weeds Act 1993 repealed)</i>	As an owner/occupier of land, given a weed control notice by a local control authority, or a successor in title to the owner or occupier who has notice of the notice, must not fail to comply with the notice (refer to Division 5, Clause 26).	If required	N/A	All – Noxious weeds to be controlled as specified under the control category.
<i>Pesticides Act 1999</i>	Any possession of pesticides on the site must be authorised through a permit in accordance with Section 12 of this Act. Any application of pesticides in association with the site must be undertaken by a person who is licensed to carry out that type of work in accordance with Part 6 (Section 45) of this Act.	If required	NA	All – Engage suitably qualified pest controller for the site as required.
Contamination				
<i>Contaminated Land Management Act 1997</i>	In accordance with Section 60, the EPA must be notified if: <ul style="list-style-type: none"> Contaminants exceed thresholds contained in the guidelines or regulations, where contamination has entered or will foreseeably enter neighbouring land, the atmosphere, groundwater or surface water Contaminants in soil are equal to or exceed guideline levels with respect to the current or approved use of the land Contamination meets other criteria that may be prescribed by the regulations. 	If required	N/A	All – Notification of the EPA will be undertaken, if required.

License/Permit	Requirement	Commencement Date	Expiry Date	Responsibility
<i>Protection of the Environment Operations Act 1997</i>	Notify the EPA immediately of pollution incidents where material harm to the environment is caused or threatened, in accordance with Section 148.	If required	N/A	All – Notification of the EPA will be undertaken, if required.
Hazardous Substances				
<i>Dangerous Goods (Road and Rail) Transport Act 2008</i>	In accordance with Section 6, sub-contractors will work under this section for the licensing of vehicles transporting dangerous goods. Copies of permits to be obtained upon engagement of sub-contractors and this register will be updated accordingly.	If required	NA	All – Ensure an appropriate licence is held and is in place where any transportation of dangerous goods is intended.
<i>Dangerous Goods (Road and Rail) Transport Act 2008</i>	In accordance with Section 7, sub-contractors will work under this section for the licensing of drivers transporting dangerous goods. Copies of permits to be obtained upon engagement of sub-contractors and this register will be updated accordingly.	If required	NA	All – License requirements will be obtained and briefed to all relevant operational personnel prior to operation.
Traffic and Transport				
<i>Roads Act 1993</i>	Road occupancy consent/licences under Section 138 of the <i>Roads Act 1993</i> 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.	If required	N/A	All – Ensure all relevant licenses and approvals are sought prior to undertaking works within a public road.

License/Permit	Requirement	Commencement Date	Expiry Date	Responsibility
Heritage				
<i>Heritage Act 1977</i>	Notify Office of Environment and Heritage (OEH) (Heritage Division) on discovery of a relic, in accordance with Section 14A.	If required	N/A	All – Notify OEH (Heritage Division) on discovery of a relic.
Bushfire				
<i>Rural Fires Act 1997</i>	If hot works are deemed unavoidable, then relevant hot works permits will be obtained by the Contractor under this Act, in accordance with Section 89.	If required	NA	All – Permit requirements will be obtained and briefed to all relevant operational personnel prior to and during operation.
Waste				
<i>Protection of the Environment Operations Act 1997</i>	Waste is to be transported to a facility that can lawfully accept the waste, in accordance with Section 143.	To be confirmed (commencement of operational works)	NA	All – A s143 Agreement Notice and proof of waste classification must be provided prior to the acceptance of material at the Facility.

APPENDIX C – GUIDELINES AND CODES OF PRACTICE

Table C-1 lists the guidelines, code of practices and other documents used in preparation of this Addendum and sub-plan addenda.

Table C-1 Guidelines, codes of practices and other documents used in preparation of this Addendum and sub-plan addenda

Plan	Document
This Addendum	Environmental Management Plan Guideline – Guideline for Infrastructure Projects, NSW Department of Planning, Industry and Environment, 2020
	Environmental Management Plan Guidelines, Commonwealth of Australia, 2014
ONMP – Addendum	NSW EPA Noise Policy for Industry, 2017
	Approved methods for the measurement and analysis of environmental noise in NSW (EPA, 2022)
	NSW Road Noise Policy (DECCW, 2011)
OTAMP – Addendum	AS1742.1:2021 Manual of uniform traffic control devices – General introduction and index of signs
	AS1742.13:2023 Manual of uniform traffic control devices – Local area traffic management
	AS1743:2018 Road Signs – Specification
	AS1744:2015 Standard alphabets for road signs

APPENDIX D – ASPECTS AND IMPACTS REGISTER

Aspects and Impacts Register

The following risk assessment matrix has been used to determine the risk of each individual environmental aspect relevant to the Operation of the Development. The level of risk determined from the matrix identifies the level of control measures required for that environmental aspect and its potential environmental impacts, as detailed in Table D-1.

Risk Ranking Matrix

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

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

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

Table D-1 Aspects and impacts register (P = Probability, C = Consequence, R = Risk)

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
		P	C	R		P	C	R	
Approvals and Licencing									
Non-compliance with conditions of approvals and consents Appropriate approvals/licences not obtained	Works delays Infringements/regulatory actions Breach of deed requirements Reputational loss	4	5	20	Maintain register of approvals, licences and permits Implement Compliance Tracking Program to track compliance Implement this Addendum Provide appropriate training	3	3	9	Asset Manager Facilities Manager HSE Manager Warehouse Tenants
Training									
Not providing training to all personnel and subcontractors	Non-compliance/non-conformance with agreed work methods and procedures	3	3	9	Induct all personnel to cover Development-specific environmental requirements Provide toolbox talks for all personnel to cover the requirements of this Addendum and sub-plan addenda	2	2	4	HSE Manager
Emergency									
Emergency services	Inability of emergency services to access site	3	4	12	Design access roads to allow emergency services to access site if required Do not block site access Always have the water supply available Fill water carts fully with water when on standby	3	2	6	HSE Manager Warehouse Tenants
Works requiring a hot works permit	Sparks from activities Property damage	2	5	10	Implement the management measures in the MPW Stage 2 Bushfire Emergency and	1	5	5	HSE Manager Facilities Manager

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
	Destruction of flora and fauna Increase the potential for bushfire with increases in temperature				Evacuation Plan and MPW Stage 2 Operational Emergency Response Plan				Warehouse Tenants
Noise /Vibration									
Noise from general construction and operation activities during and out of construction hours resulting in impacts to residents	Disturbance to residents or neighbouring businesses Potential for complaints Disruption to community and surrounding fauna	4	4	16	Implement the management measures in the ONMP – Addendum	3	3	9	HSE Manager Facilities Manager Communications Manager Warehouse Tenants
Water Quality, Erosion & Sedimentation									
Sediment laden runoff leaving site during operations Non-compliant water from operation discharged from site	Degradation of local watercourses Damage to off site flora and fauna habitat and aquatic ecology Not compliant with discharge criteria Community impacts Soil loss	4	4	16	Implement the management measures in the SIOMP – Addendum and SQMP – Addendum	2	3	6	HSE Manager Facilities Manager Communications Manager Warehouse Tenants
Waste									
Waste generation and disposal during construction	Incorrect disposal of waste Prosecution Depletion of natural resources and disposal of large amounts of waste to landfill	3	2	6	Implement waste management measures in accordance with statutory requirements	2	2	4	HSE Manager Facilities Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
	Reputational impacts								
Contamination/Pollution Prevention									
Management of contaminated or untreated materials Unexpected (including asbestos, unexpected ordnance (UXO), exploded ordnance (EO) and exploded ordnance waste (EOW)), contaminated spoil during operation	Pollution of surface water, groundwater and land through spread of existing contamination resulting in water quality degradation Safety risk to staff and community from safety hazards associated with chemical contaminants, UXO, EO and EOW	3	4	12	Implement the management measures in the LTEMP relevant to operations In the event that contamination hotspots are identified during operations, incorporate procedures for these locations into LTEMP Implement the Unexpected Finds Protocol as required Implement the management measures in this Addendum Provide emergency spill kits on site and include required maintenance	2	2	4	HSE Manager Facilities Manager Warehouse Tenants
Hazardous Materials									
Storage of hazardous substances, leaking plant and equipment and spillage from refuelling Removal of hazardous materials	Localised ground contamination/pollution of stormwater and requiring clean-up and/or receiving fill Risk of igniting volatile substances Unauthorised access to site/potential vandalism/damage leading to pollution	4	3	12	Provide emergency spill kits on site and include required maintenance Inspect and audit storage areas and materials regularly Restrict access to storage areas Reduce/eliminate need for hazardous substances Secure all work sites before leaving the site Lock away all liquids (i.e. fuels, paints) securely at the end of each day Wear appropriate PPE Implement the processes detailed in the MPW Stage 2 Operational	2	2	4	HSE Manager Facilities Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
					Emergency Response Plan in the event of an oil, chemical or fuel spill that results in an emergency				
Biodiversity									
Clearing and grubbing of vegetation within work site	Sediment deposition into surrounding vegetated areas and water courses, and invasion of weeds Removing wrong vegetation Potential for injury to native fauna Habitat loss/fragmentation. Spread of noxious weeds	3	4	12	Implement the management measures in the OFFMP – Addendum	2	3	6	Asset Manager HSE Manager Facilities Manager Warehouse Tenants
Use of heavy and light vehicles and equipment	Risk of collision with fauna Creation of hazards for fauna Mortality to flora and fauna	2	3	6	Implement the management measures in the OFFMP – Addendum Induction/toolbox training to include clearance zones and required protection measures Contact the local wildlife rescue agency and/or veterinary surgery for animal injuries	1	3	3	Asset Manager HSE Manager Facilities Manager Warehouse Tenants
Air Quality									
General operations	High dust activity in close proximity to residential and commercial premises Possibility of complaints Odours from contaminated material	4	4	16	Implement the management measures in the OAQMP – Addendum	3	3	9	Asset Manager HSE Manager Facilities Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
	stockpiles or due to use of bitumen/road sealing								
Exhaust from plant and equipment	Emissions resulting in air pollution	3	2	6	Induction/toolbox training to include air quality management. Maintain plant and equipment	2	2	4	HSE Manager Facilities Manager Warehouse Tenants
Heritage									
Unexpected heritage items encountered (removal or disturbances to heritage items)	Work delays Additional studies Approval requirements Damage to heritage items	3	4	12	Induction/toolbox training to include heritage management protocols. Implement the Unexpected Finds Protocol as required	2	4	8	HSE Manager Facilities Manager Heritage Consultant
Traffic									
General operations traffic disturbing public access between local roads	Disturbance to local residents resulting in complaints being made Potential for delays at local road access points resulting in compliant	3	3	9	Implement the management measures in the OTAMP – Addendum Advertise/notify detour routes Provide clear notifications/signage	2	2	4	HSE Manager Facilities Manager
Management of heavy vehicles/haulage routes	Complaints from sensitive receivers due to increased level and frequency of noise Increasing local traffic Changes to local traffic conditions	3	3	9	Implement the management measures in the OTAMP – Addendum	2	2	4	Asset Manager HSE Manager Facilities Manager Warehouse Tenants
Heavy and light vehicle use of unauthorised access routes	Disturbance to local road users and residents resulting in complaints Safety risk to road users	3	4	12	Induction of new drivers regarding approved access routes	2	3	6	HSE Manager Facilities Manager Communications Manager

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
	Potential for delays at local road access points				Implement the management measures in the OTAMP – Addendum Implement community notification procedures				Warehouse Tenants
Driving around site and off site	Disturbance to EEC areas/ heritage sites Generation of dust leading to complaint/ impact on EEC habitat Spread of weeds	4	3	12	Do not access EEC areas by vehicle Park on hard stand areas where possible, or outside of the drip line of trees Maintain site speed limits and signage speed limits on site	3	3	9	HSE Manager Facilities Manager Warehouse Tenants
Resources and Energy Use									
Energy consumption during operation	Inappropriate energy use Waste of energy resources Energy wastage costs Increasing greenhouse gas emissions	3	3	9	Induction/toolbox training to include waste management and energy saving practices during operations Avoid plant/equipment idling where possible on site Undertake equipment/plant inspections prior to use Consider of material substitution where reasonable and feasible to reduce embodied energy of materials used for operations and maintenance	3	2	6	HSE Manager Facilities Manager Warehouse Tenants
Water usage during operational activities	Excess usage of portable water for operational activities leading to a decline in the amount of portable water for residents	3	2	6	Include water conservation and verifiable targets Capture and reuse rainfall and runoff for site activities	2	2	4	HSE Manager Facilities Manager Warehouse Tenants

Aspect	Consequence	Initial Risk Rating			Control Measures	Residual Risk Rating			Responsible Person(s)
Resource usage (e.g. building materials, water, fuels, packaging), waste generation and disposal	Depletion of resources due to the wastage	2	4	8	Implement waste management measures in accordance with statutory requirements	1	4	4	HSE Manager Facilities Manager Warehouse Tenants
Visual									
Warehouse operation, including presence of graffiti	Light spill impacts to surrounding sensitive receivers and flora and fauna Reduced visual amenity for residents and the community	5	1	5	Maintain direct lighting Maintain landscaping as required by the LVMP – Addendum	4	1	4	HSE Manager Facilities Manager Warehouse Tenants
Community									
Disruption to the community due to operational activities	Impacts on local residents	3	2	6	Maintain communication with the community	2	2	4	HSE Manager Facilities Manager Warehouse Tenants