

# CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Moorebank Precinct East Stage 2 -  
SSD 7628

Moorebank Intermodal Precinct – Precinct East Stage 2  
SSD 7628

Construction Environmental Management Plan

Authors		
Checker		
Approver		
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Original Author Details

Author Details	Qualifications and Experience
	PhD Molecular and Cellular Biology BS Biochemistry has over 15 years of experience including post-approval environmental management and compliance on large infrastructure projects.

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Revision	Date	Description
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017	22/07/2022	Updates associated with: <ul style="list-style-type: none"> <li>• SSD 7628 MOD1</li> <li>• WH 6&amp;7 amended layout</li> </ul>
018	25/09/2023	Updates associated with:



Revision	Date	Description
019	03/12/2024	<ul style="list-style-type: none"> <li>RfMA-043 – Inclusion of Moorebank Avenue Realignment early works scope</li> </ul> <p>Updates associated with:</p> <ul style="list-style-type: none"> <li>SSD 7628 MOD5</li> <li>RfMA-042 - Figure 1-2 of Moorebank Precinct East (LOGOS compound)</li> <li>RFMA-044 - Figure 1-2 of Moorebank Precinct East (MAUW compound)</li> <li>RfMA-045 - Figure 1-2 of Moorebank Precinct East (Temporary Storage Compound)</li> <li>Administrative updates to reflect development status</li> </ul>

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## Acronyms and Definitions

Acronym / Term	Meaning
CAQMP	Construction Air Quality Management Plan
CCS	Community Communication Strategy
CEC	Community Engagement Consultant
CEMP	Construction Environmental Management Plan
CMP	Contamination Management Plan
CoC	Conditions of Consent
Construction area	Extent of construction works, namely areas to be disturbed during the construction of the Development, as identified in the MPE S2 RtS.
Contractor's CM	Contractor's Construction Manager
Contractor's EM	Contractor's Environmental Manager
Contractor's WM	Contractor's Works package Manager
DM Communication	Development Manager (Communication)
Development, the	Stage 2 of the MPE Concept Approval (MP 10_0193) approved as the MPE Stage 2 Development (SSD 7628) as consolidated. It involves the construction and operation of warehousing and distribution facilities on the MPE Site and upgrades to approximately 1.5 kilometres of Moorebank Avenue.
Development site	The subject of the MPE Stage 2 EIS, the part of the MPE Site which includes all areas to be disturbed by the Development (including the operational area and construction area).
Development Management Team	The Development management team would include, as a minimum the Development Manager, Construction Manager, Environmental Manager and Site Supervisor. Additional parties may be included where deemed relevant.
Development Personnel	All persons listed in Section 2.4 including sub-contractors working on the Development site.
Development Site	The subject of the MPE Stage 2 EIS, the part of the MPE Site which includes all areas to be disturbed by the Development (including the operational area and construction area).
DIPNR	Department of Infrastructure Planning and Natural Resources
DJLU	Defence Joint Logistics Unit
DNSDC	Defence National Storage and Distribution Centre
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water(formerly DotEE)

Acronym / Term	Meaning
DP&E	Department of Planning and Environment (now DPHI)
DPHI	Department of Planning Housing and Infrastructure (formerly DPIE)
DPIE	Department of Planning, Industry and Environment (formerly DP&E now DPHI)
Early Works	Site preparation works, including: (a) establishment of site access points; (b) installation of temporary site fencing; (c) remediation, where required, including unexploded ordnance (UXO), exploded ordnance (EO) and exploded ordnance waste management; (d) survey; acquisitions; or building/ road dilapidation surveys; (e) establishment of site compounds; (f) installation of environmental mitigation measures; (g) heritage archival monitoring and recording; (h) heritage salvage; (i) clearing of non-native vegetation; (j) importation, stockpiling and placement of 60,000 m3 of spoil (k) utilities adjustment and relocation that do not present a significant risk to the environment, as determined by the Environmental Representative; and (l) other activities determined by the Environmental Representative to have minimal environmental impact.
ECM	Environmental Control Map
EIS	Environmental Impact Statement
EMS	Environmental Management System
Environmental Emergency	Any event that causes or has the potential to cause material harm to the environment. An environmental emergency is a Class 3 incident.
Environmental Incident	A set of circumstances resulting in harm, or potential harm, to the environment. Environmental incidents include pollution incidents and environmental emergencies. Environmental incidents may arise from natural (e.g. storm, wind or bushfire) or human factors.
EO	Exploded ordnance
EP&A Act	Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999
ER	Environmental Representative

Acronym / Term	Meaning
EWEMP	Early Works Environmental Management Plan
FCMMs	Final Compilation of Mitigation Measures
ICAM	Incident Cause Analysis Method
IMEX	<p>Import Export Terminal. Includes the following key components:</p> <ul style="list-style-type: none"> <li>• Truck processing, holding and loading areas – entrance and exit from Moorebank Avenue</li> <li>• Rail loading and container storage areas – installation of four rail sidings with adjacent container storage area serviced by manual handling equipment initially overhead gantry cranes progressively.</li> <li>• Administration facility and associated car parking – light vehicle access from Moorebank Avenue</li> </ul>
ISCA	Infrastructure Sustainability Council of Australia
Material harm	<p>Material harm is harm that:</p> <ul style="list-style-type: none"> <li>• Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</li> <li>• Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).</li> </ul>
MAUW	Moorebank Avenue Upgrade Works
Minor Amendment	<p>Minor amendments to the CEMP are those that:</p> <ul style="list-style-type: none"> <li>• Comprise updating the CEMP or are of an administrative nature, and are consistent with the terms of the consent and the CEMP, sub-plans and monitoring programs approved by the Secretary</li> <li>• Do not significantly alter the outcomes of the Development, such that a planning modification would be required by DPHI</li> <li>• Are not considered to carry significant environmental risk, more than those outlined in the Environmental Impact Statement (EIS)</li> <li>• Will not detrimentally increase predicted impacts to the surrounding communities.</li> </ul>
Moorebank Precinct	Refers to the whole Moorebank intermodal Precinct, i.e. the MPE Site and the MPW site.
MPE	Moorebank Precinct East
MPE Concept Plan Approval	MPE Concept Approval (MP 10_0193), granted by DP&E on 29 September 2014 for the Development of an intermodal terminal facility including; a rail link connecting the site to the Southern Sydney Freight Line, an intermodal terminal, warehousing and distribution facilities and a freight village.

Acronym / Term	Meaning
MPE EPBC Approval	Commonwealth Approval (No. 2011/6229) granted in March 2014 under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> , for the impact of the MPE Development 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).
MPE Stage 2 EIS	Moorebank Precinct East Stage 2 Proposal – Environmental Impact Statement publicly exhibited between 13 December 2016 and 24 February 2017.
MPW	Moorebank Precinct West
Native vegetation	For the purposes of this management plan, native vegetation is defined as areas of plant community types mapped by Arcadis and WSP Parsons Brinckerhoff in the Moorebank Precinct (including Moorebank Precinct East and Moorebank Precinct West), being a consolidation of all assessments for the Moorebank Precinct conducted since 2011.
Non-compliance	An occurrence, set of circumstances, or Development that results in a non-compliance or is non-compliant with Development Consent SSD 7628 Conditions of Consent or EPBC Act Approval (EPBC 2011/6229) Conditions of Approval but is not an incident
Non-conformance	Observations or actions that are not in strict accordance with the CEMP and the aspect specific sub-plan as there may be activity-specific justification for a change in implementation of the requirements of the management plan.
OEH	Office of Environment and Heritage
OSD	On-site detention basin
POEO Act	Protection of the Environment Operations Act 1997
Pollution Incident	A set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).
PIRMP	Pollution Incident Response Management Plan
Rail link	Part of the MPE Stage 1 Proposal (14-6766), connecting the MPE Site to the SSFL. The Rail link (as discussed above) is to be utilised for the operation of the Proposal.
RALP	Rail Access Lands Package
RfMA	Request for Minor Amendment
RtS	Response to Submissions
SODCT	Sustainability Online Data Collection Tool
SHEMS	Safety Health and Environmental Management System

Acronym / Term	Meaning
SSD	State significant development
UHI	Urban Heat Island
UHIMS	Urban Heat Island Mitigation Strategy
UXO	Unexploded ordnance
VENM	Virgin excavated natural material

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## 1. Background

### 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. Introduction

Approval for the construction and operation of Stage 2 of the Moorebank Precinct East (MPE) Development, operated by ESR Australia & NZ (formerly LOGOS), which comprises the second stage of development under the MPE Concept Approval (MP10\_0193) was received 31 January 2018 (State significant development (SSD) 7628)), as consolidated.

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

- Stage 1 – Construction of the IMEX facility and rail link
- Stage 2 – Construction of warehouse and distribution facilities
- Stage 3 – Extension of the IMEX and completion of warehouse and distribution facilities.

The MPE Site is located approximately 27km south-west of the Sydney Central Business District and approximately 26km's west of Port Botany and includes the former Defence National Storage and Distribution Centre (DNSDC) site. The MPE Site is situated within the Liverpool Local Government Area, in Sydney's south-west subregion, approximately 2.5km's from the Liverpool City Centre.

Stage 2 of the MPE Development (hereafter "the Development") involves the construction and operation of warehousing and distribution facilities on the MPE Site. It includes an upgrade of approximately 2.1 km's of Moorebank Avenue.

Key components of the Development include:

- Earthworks including the importation of 600,000m<sup>3</sup> of fill and vegetation clearing
- Importation, stockpiling and placement of up to 250,000m<sup>3</sup> of suitable spoil (separate to the 600,000 m<sup>3</sup> of imported clean general fill permitted for bulk earthworks)
- Approximately 300,000m<sup>2</sup> gross floor area of warehousing and ancillary offices
- Warehouse fit-out
- Freight village, 8,000m<sup>2</sup> gross floor area of ancillary retail, commercial and light industrial land uses
- Internal road network and hardstand across the site
- Ancillary supporting infrastructure within the site, including:

- Stormwater, drainage and flooding infrastructure
- Utilities relocation/installation
- Fencing, signage, lighting, remediation and landscaping
- Moorebank Avenue upgrade including:
  - Raising by about two metres and some widening
  - Embankments and tie-ins to existing Moorebank Avenue road levels
  - Signalling and intersection works
- Intersection upgrades along Moorebank Avenue including:
  - Moorebank Avenue/MPE Stage 2 access
  - Moorebank Avenue/MPE Stage 1 northern access
  - Moorebank Avenue/MPE Stage 2 central access
  - Moorebank Precinct West (MPW) Southern Access/MPE Stage 2 southern emergency access.

The MPE Site is defined by the MPE Concept Plan Approval (MP10\_0193) and is provided in Figure 1-1.

Moorebank Avenue Realignment Works (MARW) was approved by the NSW Minister for Planning on 14 October 2021 as State Significant Infrastructure (SSI-10053) (Infrastructure Approval) under Division 5.2 of the Environmental Planning and Assessment Act 1979 (EP&A Act). It is also a controlled action under Section 130(1) and 133(1) of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and was approved by the Minister for the Environment on 7 December 2021 (EPBC Approval 2020-8839).

The footprint of MARW, which generally runs along the northern and eastern boundary of the MPE Site, interfaces and encroaches on the MPE Site. In order to allow for progression of construction works for MARW (in particular, the northern carriageway), some early preparatory works are required that are located within the MPE Site (where the project boundaries overlap). These works are undertaken under the MPE CEMP, with the MARW CEMP not being relevant to these works.

This CEMP defines the environmental management framework under which the Development will be delivered.

Figure 1-1 Site Location

Construction Environmental Management Plan

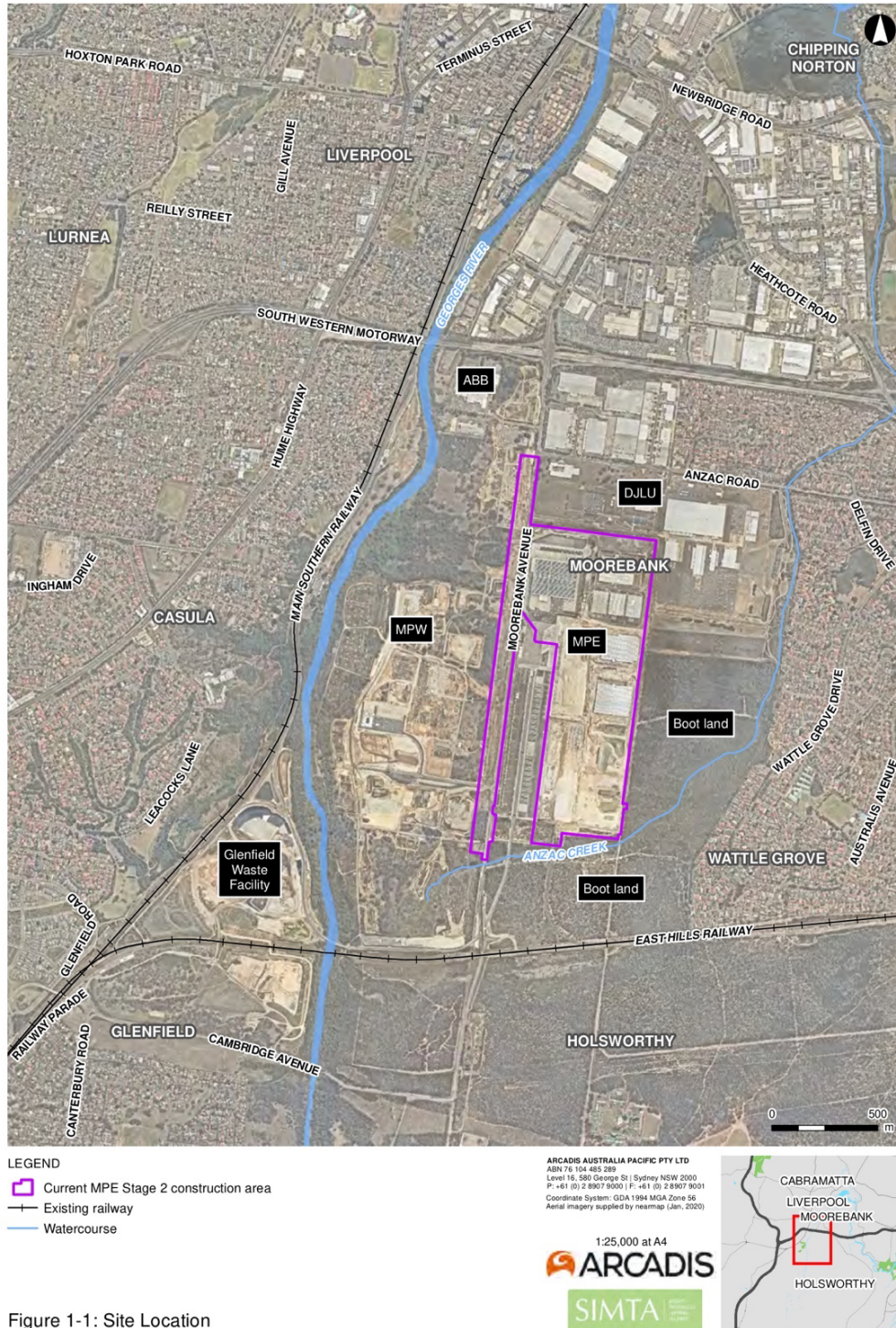


Figure 1-1: Site Location

Date: 4/03/2020 Path: \\hc-aus-na-fs-01\jobs\A008765\L-GIS\A\_Current\B\_Maps\MPE\Stage2\MPE\_S2\_CEMP\SIMTA\_MPE\_S2\_CEMP\_008\_SiteOverview\_A4P\_v5.mxd  
 Created by: TT  
 QA by: RM

### 1.3. Development Consent

The MPE Stage 2 Development was assessed by the DPE under Part 4.7 (Division 4.1 prior to 1 March 2018) of the EP&A Act as SSD. The Planning Assessment Commission granted approval for the MPE Stage 2 Development on 31 January 2018 and is subject to the Minister's CoCs (SSD 7628) as consolidated. The Development has subsequently been modified. The Development, including its potential impacts, consultation and proposed mitigation and management, is documented in the following suite of documents:

- SSD consent SSD 7628, as consolidated
- SSD partial consent (subdivision) SSD 7628, as consolidated
- Moorebank Precinct East – Stage 2 – Environmental Impact Statement (Arcadis Australia Pacific Pty Limited, December 2016)
- Moorebank Precinct East – Stage 2 – Response to Submissions (Arcadis Australia Pacific Pty Limited, July 2017)
- MPE *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval (No. 2011/6229) granted on March 2014
- MPW *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval (No. 2011/6086) granted on September 2016 (for Moorebank Avenue Upgrade Works only)

#### 1.3.1. CEMP Context

This CEMP forms part of the overarching Project Management Plan for delivery of the Development and provides a structured approach to the management of environmental issues during construction of the Development. The CEMP is to be read in conjunction with the Project Management Plan.

This CEMP has been developed in accordance with:

- Department of Climate Change, Energy, the Environment and Water (DCCEEW) Approval (EPBC 2011/6229)
- The Minister's Conditions of Consent (CoC) and Development Consent SSD 7628, as modified
- Final Compilation of Mitigation Measures (FCMM) from the MPE Stage 2 Response to Submissions (RtS)
- Infrastructure Sustainability Council (ISC) Project specific requirements
- Guideline for the Preparation of Environmental Management Plans (Dept. of Infrastructure Planning and Natural Resources (DIPNR), 2004)
- MPE – Stage 2 Proposal: Response to Submissions, Appendix I: Consolidated Proposal Description
- MPE – Stage 2 Proposal: Response to Submissions, Appendix H: Pre-construction Environmental Works Method Statement
- MPE – Stage 2 Proposal Environmental Impact Statement.

This CEMP is relevant during the construction phase of the Development.

### 1.3.2. Staged Submission of this Plan

Subject to the approval of the Secretary (CoC A14), the Development has elected to stage the submission of a number of strategies, plans and programs that are required by the CoCs based on the Delivery Works Phases identified in Table 1-1.

In accordance with CoC A15, Table 1-1 identifies the stage of the Development to which this document applies, and the relationship to any future stage. The trigger for updating the document is also identified. When a document is updated, the most recent version of the document will supersede the previous version(s).

Table 1-1 Staged Documentation and Triggers to Satisfy CoC A15

Delivery Works Phases	General Description of Works	Current Document	Trigger to Update Document
<b>Early Works</b>			
Early Works	Utilities adjustments and relocations, clearing and stripping of topsoil, heritage salvage, fill importation, establishment of site access, temporary fencing and compound establishment, asbestos and hazardous material removal and demolition of buildings	<input type="checkbox"/> Document prepared to address Early Works only	Prior to the commencement of construction works
<b>Construction</b>			
Construction Phase A	Early Works activities (as described above), bulk earth works, drainage and utilities, construction and internal fit-out of warehousing and finishing works	<input type="checkbox"/> Document prepared to address Construction Works Phase A only (does not address Moorebank Avenue upgrade works)	Prior to the commencement of Moorebank Avenue upgrade works
Construction Phase B	Construction Phase A activities, construction of the Moorebank Avenue Diversion Road, bulk earthworks, drainage and utilities and pavement works	<input checked="" type="checkbox"/> Document prepared to address all construction works (Phase A + Phase B)	

### 1.3.3. CEMP Purpose, Objectives and Application

The primary purpose of the CEMP is to define the environmental management framework and management measures that are to be implemented throughout the construction of the Development, enabling Development personnel to understand their obligations under applicable environmental legislation, specifications and approvals and minimise environmental impacts associated with construction of the Development.

The objectives of this CEMP are to:

- Identify relevant environmental legal and other regulatory requirements applicable to the construction works

- Identify the potential environmental aspects and impacts associated with construction of the Development and provide management measures which enable the Development to minimise and manage impacts on the environment and community
- Assign responsibility for the implementation, management and review process
- Provide a consistent and uniform approach which assures that the required standards and environmental protection are attained and maintained for the duration of the Development works
- Provide all personnel working on the Development with sufficient information to undertake their works in accordance with the development consent conditions, contractual, legal and other relevant environmental requirements
- Provide a framework for training, development and support (systems, procedures and documentation) necessary to undertake the works
- Capture the commitments from the Environmental Impact Assessment (EIA) process
- Establish and define environmental roles and responsibilities
- Assist senior management and construction personnel to understand their environmental duty of care under legislation and terms of the contract
- Provide a consistent approach for environmental management of the MPE
- Meet the requirements of, and align with, *AS/NZS ISO 14001:2015 Environmental Management System*.

Implementing this CEMP effectively enables the Development team to meet its regulatory and policy requirements in a systematic manner and continually improve its environmental performance.

#### 1.3.4. Stakeholder Consultation

The CEMP sub-plans were produced in consultation with the relevant stakeholders identified in the CoCs. Table 1-2 provides a summary of the stakeholders consulted during preparation of the plans.

During the consultation process comments received were addressed within relevant sub-plans, with plans updated to address comments received. Evidence of consultation is included in each relevant sub-plan.

Table 1-2 Consultation Summary

Agency	Plan(s) Consulted	Status
Campbelltown City Council	Construction Traffic and Access Management Plan	Closed
Department of Defence	Construction Heritage Management Plan	Closed
Environmental Protection Authority	Construction Noise and Vibration Management Plan	Closed
Liverpool City Council	Construction Traffic and Access Management Plan	Closed



Agency	Plan(s) Consulted	Status
	Construction Heritage Management Plan	Closed
Moorebank Heritage Group	Construction Heritage Management Plan	Closed
NSW Heritage Division	Construction Heritage Management Plan	Closed
	Unexpected Finds Protocol – included in Construction Heritage Management Plan	Closed
Office of Environment and Heritage	Unexpected Finds Protocol – included in Construction Heritage Management Plan	Closed
	Construction Flora and Fauna Management Plan	Closed
Registered Aboriginal Parties	Unexpected Finds Protocol – included in Construction Heritage Management Plan	Closed
Roads and Maritime Services	Construction Traffic and Access Management Plan	Closed
Transport for NSW	Construction Traffic and Access Management Plan	Closed

### 1.3.5. CEMP Approval and Implementation

This CEMP was submitted to DCCEEW for approval in accordance with the MPE EPBC Approval (EPBC 2011/6229) and MPW EPBC Approval (EPBC 2011/6086).

For construction Phase B, this CEMP was reviewed and endorsed by the Development's Environmental Representative (ER). In accordance with CoC C8 this CEMP was submitted to DPHI for approval by the Secretary one month prior to the commencement of Phase B. The DPHI notification in compliance with CoC A 18 was submitted one month prior to commencement of a new phase of the Development

Construction did not commence until the CEMP was approved (CoC C2(a)).

Construction is to be undertaken in accordance with the most recent, approved version of this CEMP (CoC B1(c), C2(b)).

### 1.3.6. Distribution and Availability

The master 'controlled' CEMP document is to be held within the Development's document management system where it can be accessed by personnel as necessary.

The most recent approved version of this CEMP and other nominated documents and records are made publicly available on the Development's website (<https://moorebankintermodalprecinct.com.au>), in accordance with CoC C20.

### 1.3.7. Revision

The CEMP is to be reviewed annually, as a minimum, but may be revised more regularly depending on process changes and refinements. Revisions of this CEMP may result from:



- CEMP review
- Audits (either internal or by external parties)
- Changes to the EMS
- Changes to procedures, scope of works and/or systems after an incident or potential incident
- Design changes, where a change to procedures or additional mitigation measures are required
- Construction activity changes, where a change to procedures or additional mitigation measures are required
- Changes in the CoCs
- Identification of opportunities for improvement or deficiencies in the Development system (e.g. through the course of site inspections)
- Following, complaints, where a change to procedures or additional mitigation measures are required

Revisions that are classified as Minor Amendments, in accordance with CoC C24(h) are to be reviewed and approved by the Principal's Representative then issued to the ER who in accordance with CoC C24 (h) can approve or reject "minor" amendments to the CEMP. Minor amendments to the CEMP are those that:

- Are of an administrative nature, and are consistent with the terms of the consent and the CEMP, CEMP sub-plans and monitoring programs approved by the Secretary
- Do not significantly alter the outcomes of the Development, such that a consent modification would be required by the DPHI
- Are not considered to carry environmental risk, more than those outlined in the Development's Environmental Impact Statement (EIS)
- Will not detrimentally increase predicted impacts to the surrounding communities.

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

A variation to the CEMP must also be submitted to DCCEEW for approval in accordance with the EPBC Act Approval (2011/6229) CoA 14. However, where the revised plans would not be likely to have a new or increased impact, the CEMP will be submitted to DCCEEW for information in accordance with EPBC Act Approval (2011/6229) CoA 14A.

Updates to this plan are numbered consecutively and issued to holders of controlled copies.

#### **1.3.7.1. Changes to the CEMP and Sub-plans**

CoC A2 identifies that the Development must be undertaken '*in accordance with*' relevant EIA documentation and in compliance with the CoCs.

To demonstrate compliance with this condition, an assessment process has been prepared, to facilitate the review and approval of minor amendments to the CEMP and associated sub-plans.

The assessment process involves:

- Preparation of an Accordance Assessment, developed by the Principal's Representative to assess the proposed change and satisfy themselves that the change is compliant/ in accordance with the documents listed in CoC A2
- Submission of a Request for a Minor Amendment (RfMA) by the Principal's Representative to the ER to update the CEMP and sub-plans
- ER reviews RfMA and subsequently endorses the updated CEMP and sub-plans under CoC C24(h)).

The term "Minor Amendment" as it relates to this process is defined within Section 1.3.7 of this CEMP. Consideration of 'Minor Amendments' is also given to consistency with relevant Commonwealth CoAs.

#### 1.4. Development Description

The Development involves the construction and operation of warehousing and distribution facilities on the MPE Site and upgrades to approximately 2.1 km of Moorebank Avenue. Key components of the Development include:

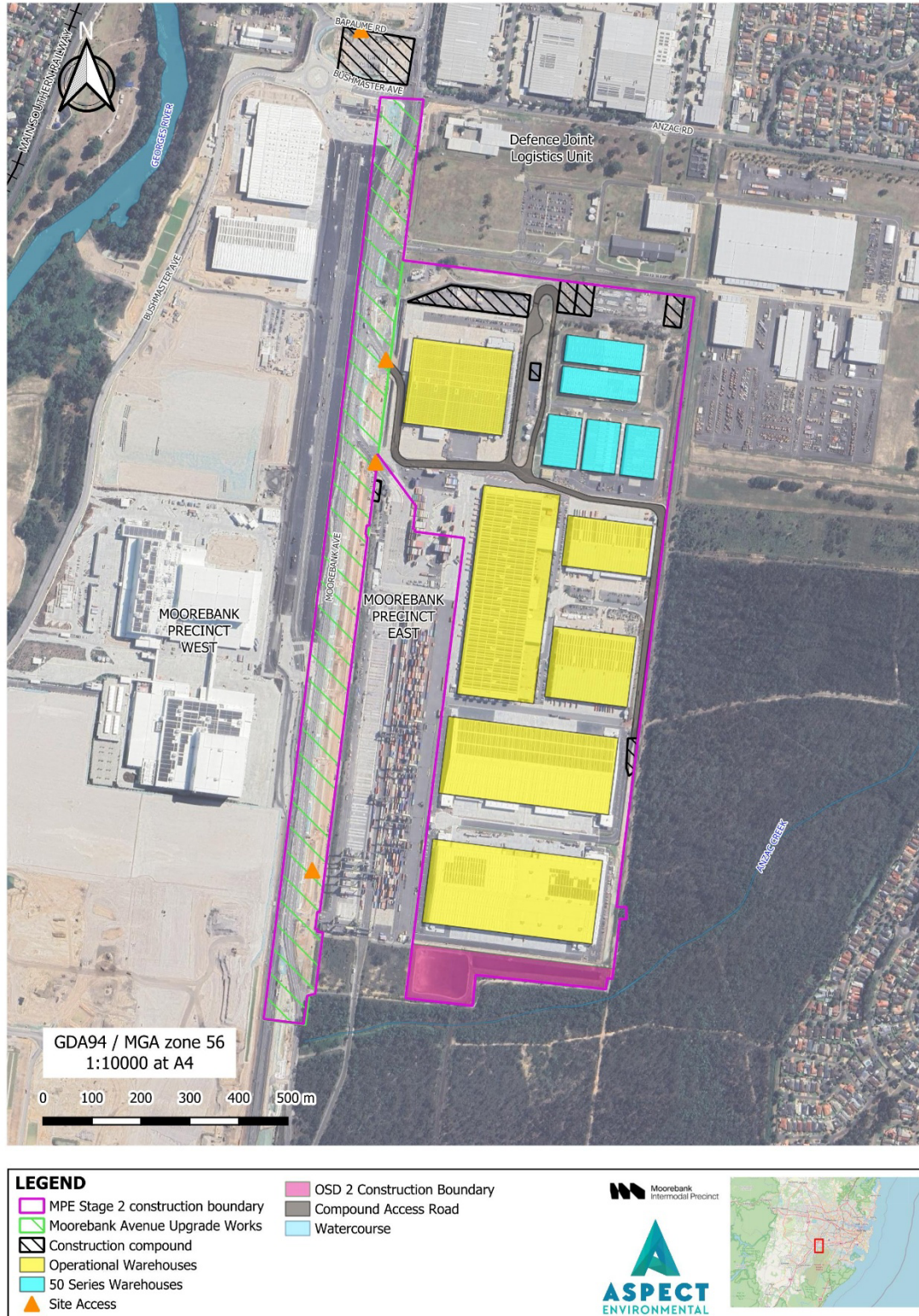
- **Warehousing** comprising approximately 300,000m<sup>2</sup> gross floor area and including, but not limited to, warehousing and attached offices, container storage areas, car parking, truck loading/unloading areas and vehicle manoeuvring and access roads
- A **freight village**, comprising 8,000m<sup>2</sup> gross floor area and including, but not limited to, freight village buildings, car parking, truck loading/unloading areas and vehicle manoeuvring and access roads
- Establishment of an internal road network, and connection of the Development to the surrounding public road network
- Ancillary supporting infrastructure within the Development site, including:
  - Stormwater, drainage and flooding infrastructure
  - Utilities relocation and installation
  - Vegetation clearing, remediation, earthworks, signage and landscaping
- **Moorebank Avenue upgrade** comprising the following key components:
  - Establishment of a temporary diversion road on the MPW Site
  - Modifications to the existing lane configuration, including some widening
  - Earthworks, raising the entire footprint equivalent to adjacent areas including construction of embankments and tie-ins to existing Moorebank Avenue pavement level at the southern and northern extents of the Development. (If Moorebank Avenue Realignment (SSI – 10053) is delivered road upgrades beyond IMEX terminal access will not be required.)
  - Installation of new road pavement
  - Installation of new road pavement
  - Establishment of temporary drainage infrastructure, including temporary basins and / or swales

- Adjusting the vertical alignment by about two metres from the existing levels, including kerbs, gutters and a sealed shoulder
- Signalling and intersection works
- Upgrading existing intersections along Moorebank Avenue, including:
  - Moorebank Avenue / MPE Stage 2 access
  - Moorebank Avenue / MPE Stage 1 northern access
  - Moorebank Avenue / MPE Stage 2 central access
  - MPW Northern Access / MPE Stage 2 southern emergency access
- **MARW preparatory works** comprising the following key components:
  - At the northern boundary of MPE Stage 2:
    - Property adjustments to Piccolo Me Cafe and display suite including partial demolition of carpark and reallocation of carparking space
    - Provide adjustments to MPE lead-in services including sewer/water meters, communication pits and electrical kiosk
    - Demolition of shared pathways
    - Establishing shared internal pathways
    - Overhead utilities adjustments as required by internal MARW works
    - Provision of local connection for temporary MARW utilities
    - Demobilisation of equipment
    - Modifications to the existing lane configuration, including some widening
  - At the southern boundary of MPE Stage 2:
    - Disconnection and removal of 11kV overhead wires to eastern on-site detention (OSD) basin water pump
    - Disconnection and removal of pad-mounted substation currently servicing the eastern water pump
    - Relocation of the generator from western to eastern water pump
    - Removal of the western water pump and associated hoses
  - At the eastern boundary of MPE Stage 2:
    - Disconnection and removal of 11kV overhead wires to Hansen Yuncken construction compound.

The above listed MARW Early Works, within the MPE 2 construction boundary are to be managed in accordance with MPE 2 CEMP and CEMP sub-plans management and mitigation measures.

The Development construction compounds, and construction area are shown in Figure 1-2, and the warehousing, freight village and Moorebank Avenue upgrade works are shown in Appendix Q.

Figure 1-2 Development Construction Compounds and Construction Area



### 1.4.1. Summary of Development Delivery Phases

The Development construction period is anticipated to be up to five years, which will be generally divided into three works phases, as detailed in the following sections.

The terminology for the Development phases or periods has developed from the preparation of the EIS and RtS documentation in response to the language of the CoCs and the need to stage the delivery of the environmental management documentation required by the CoCs. Current terminology, and the equivalent terminology from the CoCs and RtS are included in Table 1-3.

Table 1-3 Development Delivery Phase Terminology

<b>Development Delivery Phase</b>	<b>CoC A18 Phase Equivalent</b>	<b>MPE Stage 2 RtS Works Period Equivalent</b>
Early Works	Early Works	Works Period A: Pre-construction
	Fill importation (to 60,000m <sup>3</sup> )	Works Period B: Site preparation
Construction Phase A	Fill importation Construction	Works Period B: Site preparation
		Works Period E: Bulk Earthworks, drainage and utilities
		Works Period F: Construction and internal fit out of warehousing
		Works Period G: Miscellaneous construction works
Construction Phase B	Fill importation Construction	Works Period C: Construction of Moorebank Avenue Diversion Road
		Works Period D: Pavement and intersection works along Moorebank Avenue
		Works Period E: Bulk Earthworks, drainage and utilities

### 1.4.2. Early Works

Early Works is generally described as site preparatory works including utilities adjustments and relocations, clearing and stripping of topsoil (top 100 mm of topsoil), heritage salvage and fill importation (including VENM and ENM, up to 60,000 m<sup>3</sup>), establishment of site access, temporary fencing and compound establishment, asbestos and hazardous material removal and preparation for the demolition of buildings.

The Early Works includes but is not limited to:

- Geotechnical and utilities investigation works including potholing to confirm the location of existing services, disconnection of non-critical services (with retention in place), grout filling of disconnected draining lines, and adjustment and relocation where applicable
- Clearing of non-native vegetation, stripping of topsoil and stockpiling of topsoil on site for later re-use within site landscaping
- Stabilisation of areas where topsoil has been stripped with imported clean hard fill or by other methods determined by the ER to have minimal environmental impact

- Removal of asbestos from heating equipment and fire resistant building elements (e.g. fire doors) by a licenced asbestos removalist followed by clearance by a certified occupational hygienist
- Hazardous material cleaning and decontamination in Buildings 67, 69, 81 and 83
- Heritage salvage works in Buildings 37, 75 and 80 on the Development site to recover architectural elements for adaptive re-use
- Importation, stockpiling and placement of up to 60,000 m<sup>3</sup> (not exceeding a total of 22,000 m<sup>3</sup> of material per day) of imported clean general fill material by truck-and-dog and / or semi-trailer
- Establishment of a site access point at the existing MPE Site northern access and construction of associated access road, utilising existing paved areas with minor pavement extensions required, to provide for access and manoeuvrability of vehicles into and through the site in accordance with CoC B10
- Establishment of temporary site fencing, a site compound/s (includes MAUW compound establishment) and temporary car parking areas to support Early Works and construction of the Development in accordance with CoC B10
- Other activities determined by the ER to have minimal environmental impact.

Any of the activities defined in SSD Consent 7628 as 'Early Works' may be undertaken during Early Works, which may overlap the construction works phase and be undertaken concurrently with construction phase activities. All works during Early Works will be undertaken in accordance with the EWEMP and required sub-plans.

Upon the commencement of construction, this CEMP will supersede the EWEMP.

#### **1.4.3. Construction Works Phase A (excluding Moorebank Avenue Upgrade Works)**

Construction Works Phase A will include all works described in Early Works in addition to bulk earthworks, drainage and utilities, construction and internal fit-out of warehousing and finishing works. All vegetation clearing, and filling will be completed within the construction boundary. Construction Works Phase A excludes Moorebank Avenue works described in Section 1.3.4 below.

Construction Works Phase A includes, but is not limited to:

##### **Completion of Site Preparation Activities**

- Demolition of existing structures in accordance with Australian Standard AS2601-1991 – Demolition of Structures
- Clearing of remaining vegetation
- Adjusting the building formation of the site (to final operational levels) within which the Warehousing Compound will be located
- Establishment of temporary batch plant and materials crushing plant

##### **Bulk Earthworks, Drainage and Utilities**

- Importation, stockpiling and placement of up to 600,000 m<sup>3</sup> of imported clean general fill for bulk earthworks



- Importation, stockpiling and placement of up to 250,000 m<sup>3</sup> of suitable spoil (separate to the 600,000 m<sup>3</sup> of imported clean general fill permitted for bulk earthworks)
- Installation of on-site detention (OSD) and drainage infrastructure within the MPE Stage 2 site
- Construction of retaining walls
- Creation of internal road formation by general earthworks (by constructing fill embankments)
- Bulk earthworks and adjusting the building formation of the Development site to final level, including the terminal hardstand
- Utilities relocation and installation
- Establishment of hardstand areas.

### **Construction and Internal Fit out of Warehousing**

- Foundation and floor slab installation
- Erection of framework and structural walls
- Installation of roof
- Internal fit-out of warehouses (racking and associated services).
- Installation of solar panels, rainwater harvesting systems and Green star features as per the recommendations of the UHIMS. This includes helicopter assisted installation.

### **Miscellaneous Construction and Finishing Works**

- Pavement construction (internal transfer roads and perimeter road), including forming of new kerbs, gutters, medians (where required) and other structures
- Line marking, lighting and sign posting
- Installation of road furniture, including traffic signs and pavement markers.
- Miscellaneous structural construction
- Finishing works, including landscaping and general site rehabilitation, where required
- Commissioning of the Development
- Decommissioning/demobilisation of the Development site, including removal of construction compound(s) and temporary construction environmental controls.

#### **1.4.4. Construction Works Phase B**

Construction Works Phase B will include all works described in Early Works Phase and Construction Works Phase A, in addition to the Moorebank Avenue upgrade works. Generally, the Moorebank Avenue upgrade works are described as construction of the Moorebank Avenue Diversion Road, bulk earthworks, drainage and utilities, and pavement works.

Construction Works Phase B includes, but is not limited to:

#### **Construction of the Moorebank Avenue Diversion Road**

- Stripping of topsoil within footprint of temporary diversion road

- Installation of temporary drainage
- Placement of fill and temporary road pavement (e.g. gravel)
- Construction of interface between temporary diversion road and existing Moorebank Avenue
- Installation of temporary road signage, street lighting and signalling
- Transfer of traffic onto temporary diversion road from Moorebank Avenue.

### **Bulk Earthworks, Drainage and Utilities**

- Removal of existing pavement and stripping of topsoil within Moorebank Avenue
- Importation, stockpiling and placement of approximately 600,000m<sup>3</sup> of imported clean general fill for bulk earthworks
- Importation, stockpiling and placement of up to 250,000m<sup>3</sup> of suitable spoil (separate to the 600,000m<sup>3</sup> of imported clean general fill permitted for bulk earthworks)
- Creation of a road formation for Moorebank Avenue and the Moorebank Avenue Diversion Road by general earthworks (by constructing fill embankments)
- Earthworks, raising the entire footprint equivalent to adjacent areas including construction of embankments and tie-ins to existing Moorebank Avenue pavement level at the southern and northern extents of the Development. (If Moorebank Avenue Realignment (SSI-10053) is delivered, the southern road tie will not be required.)
- Installation of on-site detention (OSD) 10 and drainage infrastructure associated with MAUW
- Utilities relocation and installation

### **Pavement Works Along Moorebank Avenue**

- Placement of select layer of earthworks material on top of the road formation
- Placing and compacting the pavement later (concrete, or concrete and asphalt) over the select layer (consisting of a sub-base and base) and potential sealing and bitumen sealing as required to suit the various pavement designs (subject to change and TfNSW design approval)
- Where specified, a pavement constructed out of compacted gravel (road base) will be used in lieu of concrete sub-base and base (subject to change and TfNSW design approval)
- Installation of new road pavement, or if Moorebank Avenue Realignment (SSI-10053) is delivered, the new road pavement will be installed to the IMEX Terminal main access point only
- Traffic switching from diversion road onto final upgraded Moorebank Avenue or switch to Moorebank Avenue Realignment (SSI-10053) if delivered
- Removal of construction traffic management and progressive opening of the internal road and warehouse and IMEX access roads to traffic
- Removal of road surface, road signage, street lighting and signalling from temporary diversion road



- Commissioning of Moorebank Avenue to the southern extent of site, or if Moorebank Avenue Realignment (SSI-10053) is delivered, then commissioning to IMEX Terminal main access point.

#### 1.4.5. MARW Early Works

The MARW Early Works comprises the following activities, within the scope of the CoC for the MPE Stage 2 Development (SSD 7628):

- At the northern boundary of MPE Stage 2:
  - Property adjustments to Piccolo Me Café and display suite including partial demolition of carpark and reallocation of carparking space
  - Provide adjustments to MPE lead-in services including sewer/water meters, communication pits and electrical kiosk
  - Demolition of shared pathways
  - Establishing shared internal pathways
  - Overhead utilities adjustments as required by internal MARW works
  - Provision of local connection for temporary MARW utilities
  - Demobilisation of equipment from the area
- At the southern boundary of MPE Stage 2:
  - Disconnect and remove 11kV overhead wires to eastern on-site detention (OSD) basin water pump
  - Disconnect and remove pad-mounted substation currently servicing eastern water pump
  - Relocate generator from western to eastern water pump
  - Remove western water pump and associated hoses
- At the eastern boundary of MPE Stage 2:
  - Disconnect and remove 11kV overhead wires to Hansen Yuncken construction compound.

The MARW Early Works Development boundary is provided in Appendix Q.

The above listed MARW Early Works, within the MPE 2 construction boundary are to be managed in accordance with MPE 2 CEMP and CEMP sub-plans management and mitigation measures.

### 1.5. Construction Program

Construction of the Development commenced in the first quarter of 2018. The delivery phases are interrelated and overlap; the order of staging may alter slightly based on detailed construction contractor staging. Works will be undertaken progressively in different areas of the Development site. Some warehouses may be operational, prior to completion of construction in other areas of the site.

An indicative construction program is outlined in Table 1-4.

Table 1-4 Indicative Construction Program

Construction Works Period		2018				2019				2020				2021				2022				2023				2024				2025			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4				
Early Works	Pre-construction Activities																																
	Site Preparation Activities																																
Construction Phase A	Completion of Site preparation activities																																
	Bulk earthworks, drainage and utilities																																
	Construction and internal fit-out of warehousing																																
	Miscellaneous construction and finishing works																																
Construction Phase B	Bulk earthworks, drainage and utilities																																
	Construction of the Moorebank Avenue Diversion Road																																



Pavement and intersection works along Moorebank Avenue									
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## 1.6. Construction Hours

In accordance with CoC B65, construction works will generally be undertaken during standard daytime construction working hours, being:

- 07:00 am to 06:00 pm Monday to Friday
- 08:00 am to 01:00 pm Saturday
- No works on Sunday or public holidays.

In accordance with CoC B66, activities resulting in a high noise impact (including impulsive or tonal noise emissions) shall only be undertaken:

- Between the hours of 08:00 am to 05:00 pm Monday to Friday
- Between the hours of 08:00 am to 01:00 pm Saturday, and
- In continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block, where continuous includes any period during which there is less than a one-hour respite between ceasing and recommencing any high noise impact work.

*NOTE: For the purposes of this condition, 'continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work that is the subject of this condition.*

*High-noise impact activities and work includes jack hammering, rock breaking or hammering, pile driving, cutting of pavement, concrete or steel or other work occurring on the surface that generates noise with impulsive, intermittent or low tonal frequency characteristics.*

Notwithstanding CoC B65 and B66, works may be undertaken outside the hours specified under those conditions in the following circumstances in accordance with CoC B67:

- For the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons
- Where it is required in an emergency to avoid the loss of lives, property and / or to prevent environmental harm
- Where different construction hours are permitted or required under an EPL in force in respect of construction, in which case these construction hours must be complied with
- Where they are undertaken in accordance with an Out-Of-Hours Work Protocol detailing the assessment management and monitoring of noise as part of the Construction Noise and Vibration Management Plan (CNVMP).

Extended hours works and OOH works may occur during construction. For more detail, refer to the CNVMP.

## 1.7. Ancillary Construction Facilities

Temporary construction facilities and compounds will be required to support construction of the Development. The location of these compounds (Figure 1-2) are indicative and subject to confirmation by the construction contractor. Two primary construction compounds were identified in the MPE Stage 2 EIS, being:

- Moorebank Avenue Compound (A) (located on the MPW Site)
- Moorebank Avenue Compound (B) (located on the MPE Site)

The location of these compounds is shown in Figure 1-2 and further detail on the compounds is provided below.

#### **1.7.1. Moorebank Avenue Compound A**

The Moorebank Avenue Compound will be located on the western side of Moorebank Avenue, immediately south of Bapaume Road. Access will be from Bapaume Road.

The Moorebank Avenue Compound will include:

- Site offices
- Car parking
- Amenities block
- Equipment storage and laydown areas.

Materials, such as pre-cast culverts, will be temporarily stored within the compound area on occasion.

Access and egress to this compound for light vehicles will be via a left or right turn from Moorebank Avenue into Bapaume Road. Heavy vehicle access and egress will be via a left turn from Moorebank Avenue into Bapaume Road and vice versa. Heavy vehicles accessing the compound will travel southbound along Moorebank Avenue, will turn right into Chatham Avenue, turn around within the MPW site, turn left from Chatham Avenue (northbound) onto Moorebank Avenue and turn left into Bapaume Road.

#### **1.7.2. Moorebank Avenue Compound B**

The Moorebank Avenue Compound B will be located on the eastern side of Moorebank Avenue on MPE 1 IMEX terminal.

The Moorebank Avenue Compound B will include:

- Site offices
- Car parking
- Amenities block
- Equipment storage and laydown areas.

Access and egress to this compound for light and heavy vehicles will be via a left or right turn from Moorebank Avenue into the IMEX Terminal main access point.

#### **1.7.3. Additional Compound/ ancillary Facilities**

Additional construction compound and stockpile sites will be temporary in nature and removed / decommissioned at the completion of construction. In the event that additional construction compounds are required, or indicative compound locations or uses are amended, the following site selection criteria will be applied to their location and operation (CoC B147):

- Facility is Development of a type that would, if it were not for the purpose of the Development, otherwise be exempt or complying Development; or
- Facility is located as follows:

- (i) at least 50 metres from any waterway unless an erosion and sediment control plan is prepared and implemented so as not to affect water quality in the waterway in accordance with Managing Urban Stormwater series;
- (ii) within or adjacent to land upon which the Development is being carried out;
- (iii) with ready access to a road network;
- (iv) so as to avoid the need for heavy vehicles to travel on local streets or through residential areas in order to access the facility;
- (v) on level land;
- (vi) so as to be in accordance with the INCG (DECC 2009) or as otherwise agreed in writing with affected landowners and occupiers;
- (vii) so as not to require vegetation clearing beyond the extent of clearing approved under other terms of this approval except as approved by the ER as minor clearing;
- (viii) so as not to have any impact on heritage items (including areas of archaeological sensitivity) beyond the impacts identified, assessed and approved under other terms of this approval;
- (ix) so as not to affect lawful uses of adjacent properties that are being carried out at the date upon which construction or establishment of the facility is to commence;
- (x) to enable operation of the ancillary facility during flood events and to avoid or minimise, to the greatest extent practicable, adverse flood impacts on the surrounding environment and other properties and infrastructure; and<sup>1</sup>
- (xi) so as to have sufficient area for the storage of raw materials to minimise, to the greatest extent practicable, the number of deliveries required outside standard construction hours.

- Practicable, the number of deliveries required outside standard construction hours.

Consideration to each of the above factors will be undertaken prior to the establishment of any additional construction compound or stockpiles for the purpose of the Development. Where these facilities do not align with the description and location in the MPE Stage 2 EIS or RtS, an Ancillary Facilities Management Plan will be prepared in consultation with Liverpool Council and submitted to the Secretary for approval one month prior to installation of the facility (CoC B147).

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<sup>1</sup> Spoil stockpiles may be located in flood prone areas. However, this will only be permitted with the installation of appropriate erosion and sediment controls, including flood water diversions that are protective of other properties, in accordance with the CSWMP and the Progressive Erosion and Sediment Control drawings (as approved by a Certified Professional Erosion and Sediment Control (CPESC) or suitably qualified person).

## 1.8. Development Objectives and Targets

Development objectives and targets have been developed incorporating the governance, social and environmental aspects of sustainable development. Corresponding reporting and monitoring requirements are also detailed in Table 1-5. Note that the sustainability targets and objectives below have been developed in accordance with ISCA requirements.

Table 1-5 Development Environmental and Sustainability Targets

Objective	Target / Indicator	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP/ Sub-plan Reference
<b>Governance and Management</b>					
Construct the Development in accordance with environmental approvals	Zero non-compliances at each quarterly construction compliance reporting stage	Audits, construction compliance reporting, management review	Construction Contractor	Quarterly	Section 1 and 4 of this CEMP
Compliance with all relevant legislative requirements	Zero regulatory infringements (penalty notices or prosecutions) Zero formal regulatory warnings	Audits, construction compliance reporting, management review	Construction Contractor	Ongoing	Section 2.7 of this CEMP
Minimise the potential for environmental incidents	Class 2 or Class 3 Environmental Incident Frequency Rate (EIFR) of <1	Monthly reports	Construction Contractor	Monthly	Section 2.9 of this CEMP
Manage the environmental, social and economic impacts of our supply chain	Supplier evaluation will consider sustainability aspects through use of multi-criteria analysis or other scored means	Monitoring of Supply Contracts Monthly report	Construction Contractor	Monthly	Section 2.6 of this CEMP

Objective	Target / Indicator	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP/ Sub-plan Reference
Embed sustainability through all aspects of the Development	Achieve a Commended Design and As Built Rating within the Infrastructure Sustainability Council of Australia (ISCA) Framework for the Development.	Design Rating As Built rating	Construction Contractor Principal's Representative	As applicable	Table 1-5
<b>Minimising Social Impacts</b>					
Proactively engage with the Development team	50% of the Development's environmental and sustainability inspections accompanied by supervisory or engineering personnel	Monthly reports, weekly inspections	Construction Contractor	Weekly	Section 4.2 of this CEMP
	100% of weekly environmental and sustainability inspections signed off by the Contractor's WM	Monthly reports, weekly inspections	Construction Contractor	Weekly	Section 4.2 of this CEMP
	Environmental Toolbox Talks – minimum 1 per month	Training records	Construction Contractor	Monthly	Section 2.8 of this CEMP
Support local health and amenity	Receive less than three substantiated	Complaints form and incident register	Construction Contractor	Monthly	Community Communication Strategy



Objective	Target / Indicator	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP/ Sub-plan Reference
(Sta-4)	<p>environmental complaints per month</p> <p>Complainant contacted within four hours of receiving complaint</p> <p>Complainant concerns adequately resolved such that prevention of perceived or potential human health and/or environmental impacts are achieved.</p>		TSA Management (Community Engagement Consultant)		
Maximise employment and training opportunities	Trade jobs created during construction are filled by apprentices	Monthly reports	Construction Contractor	Ongoing	To be confirmed
<b>Minimising Environmental Impacts</b>					
Protect Biodiversity (Eco-2)	No harm to any threatened species	Weekly inspections	Construction Contractor	Ongoing	Appendix L
Minimise energy consumption and emission of greenhouse gasses	>15% reduction of scope 1 and 2 greenhouse gas emissions against a modelled business as usual scenario	Monthly online reporting of energy and fuel usage	Construction Contractor	Monthly	To be confirmed
(Ene-1/Ene-2)	>20% renewable energy usage on site	Monthly online reporting of energy and fuel usage	Construction Contractor	Monthly	To be confirmed

Objective	Target / Indicator	Reporting / Monitoring	Responsibility	Timing for Compliance	CEMP/ Sub-plan Reference
Use of sustainable materials (Mat-1)	>15% reduction in embodied energy in construction materials based on a business as usual scenario	Concrete specifications and volumes reports.	Construction Contractor	Monthly	To be confirmed
	>1% materials used that meet ISCA ECO label requirements	Product information	Construction Contractor	When procured	NA
Minimise visual impacts	Zero complaints during construction regarding light spill from temporary lighting used during construction	Daily inspections (during out of hours works) / Weekly inspections at all other times	Construction Contractor	Daily (during out of hours works) / Weekly at all other times	Appendix P Community Communication Strategy
Minimise waste production	90% of construction and demolition waste to be recycled	Waste Tracking Spreadsheet	Construction Contractor	Monthly	Appendix M
	100% of spoil beneficially reused on-site or locally (not including contaminated material)	Waste Tracking Spreadsheet	Construction Contractor	Monthly	Appendix M
	>60% of office waste recycled	Waste Tracking Spreadsheet	Construction Contractor	Monthly	Appendix M
	95% Topsoil to remain Productive	Waste Tracking Spreadsheet	Construction Contractor	Monthly	Appendix M

## 2. Environmental Framework

### 2.1. WHS Management System

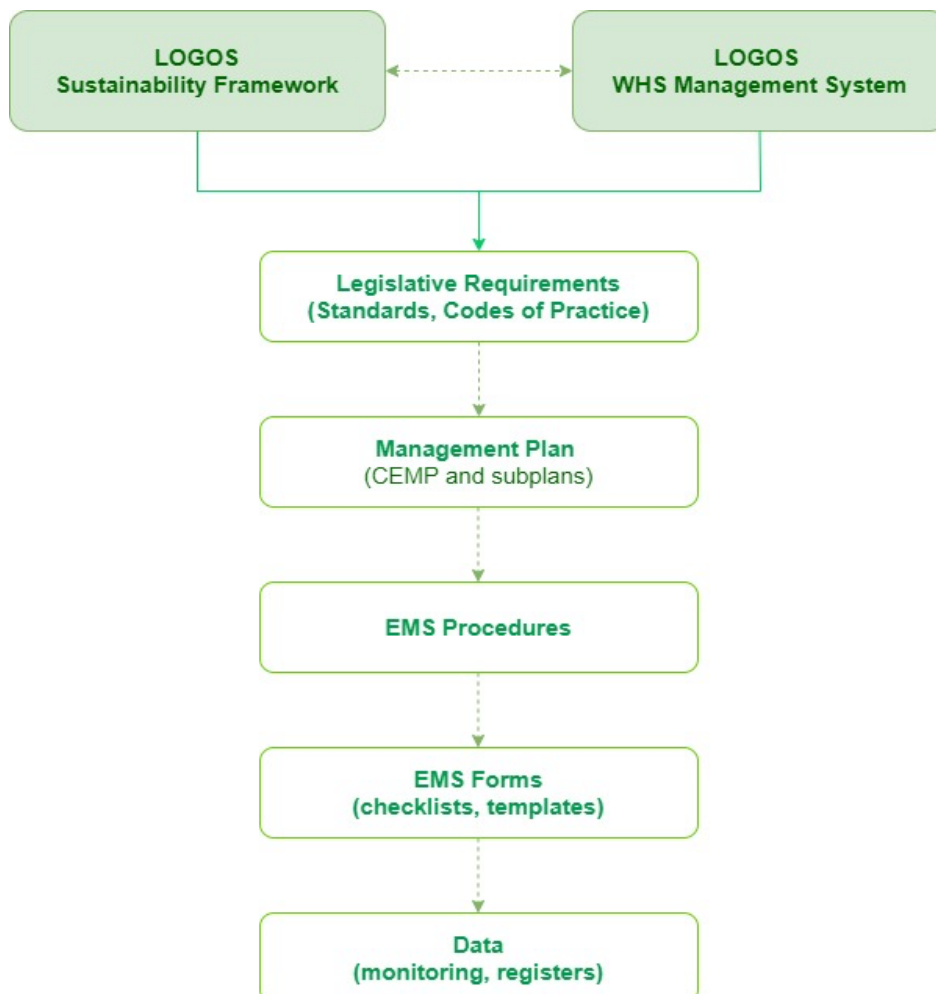
The LOGOS WHS Management System expresses LOGOS's commitment to the health and safety of workers, and protection of the environment in which LOGOS operate. The LOGOS WHS Management System is aligned to AS/NZS ISO 45001 and AS/NZS ISO 14001 (2015). It provides the overarching policies, procedures, requirements, standards and guidelines to facilitate the identifying, managing and reporting of safety and environmental risks. The WHS Management System is shown in Figure 2-1.

The WHS Management System requirements will be:

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

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

Figure 2-1 LOGOS WHS Management



## **2.2. MIP Sustainability Policy**

The LOGOS Sustainability Policy (Appendix S) describes the commitment to provide sustainable, integrated logistics solutions that add value to LOGOS customers, investors, partners, and communities. This includes, but is not limited to:

- Establishing meaningful and measurable sustainability goals and objectives relating to environment, social and governance principles across LOGOS Group's operations to ensure continuous improvement
- Promoting individual contributions to LOGOS Group sustainability initiatives, through education and awareness, thereby building a strong environmentally aware business culture
- Investing in protecting, restoring and creating opportunities to improve the biodiversity of environments in which LOGOS may have an impact.

### **2.2.1. MIP Sustainability Framework**

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

Figure 2-2 LOGOS Sustainability Framework

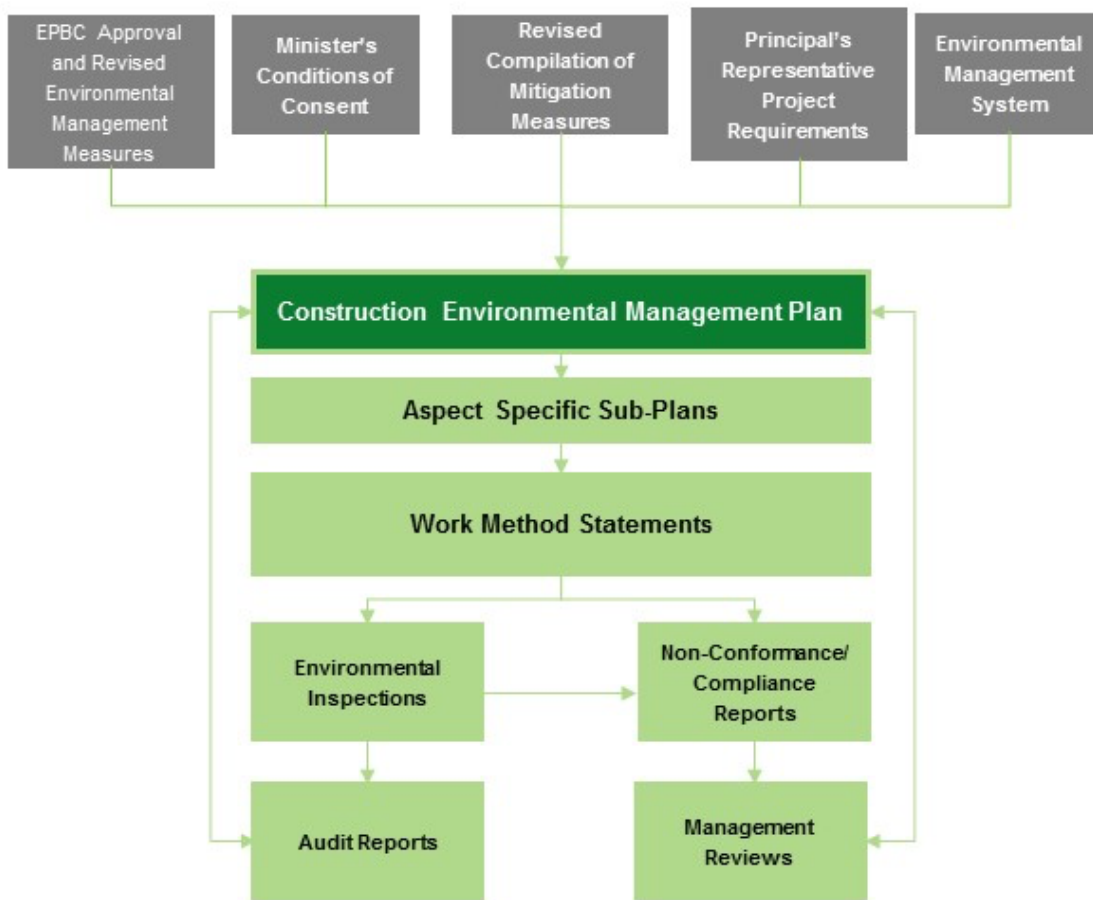


### 2.3. Environmental Management Documentation

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

Figure 2-3 shows the structure of the suite of environmental management documents that are applicable to the Development.

Figure 2-3 Environmental Management Documentation



### 2.3.1. Aspect Specific Sub-plans

Several environmental management sub-plans support the CEMP. These documents are prepared to identify requirements and processes applicable to specific environmental aspects of the activities described in Section 1.3 and address requirements of the FCMM identified in the Consent. The list of construction sub-plans, as required by CoC C1 include:

- Construction Traffic and Access Management Plan (B2)
- Concrete Batching Plant Management Plan (B31)
- Soil and Water Management Plan (B34)
- Flood Emergency Response Plan (B52)
- Construction Air Quality Management Plan (B57)
- Construction Noise and Vibration Management Plan (B77)
- Heritage Management Plan (B92)
- Construction Flora and Fauna Management Plan (B108)
- Construction and Demolition Waste Management Plan (B118)
- Contamination Management Plan (B134)

- Bushfire Emergency and Evacuation Plan (B143).

### **2.3.2. Environmental Control Maps**

The key environmental constraints for the Development are identified in the sub-plans and captured spatially in Environmental Control Maps (ECMs) (Appendix D). Key environmental constraints include:

- Development boundaries
- Heritage
- Endangered ecological communities (EEC), threatened flora and fauna species and habitat vegetation
- Potential UXO areas
- Sensitive receivers (e.g. watercourses)
- Location of site offices.

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

### **2.3.3. Environmental Work Method Statements**

Environmental Work Method Statements (EWMS) are prepared to manage and control all activities that have the potential to negatively impact on the environment. EWMS will be prepared prior to the commencement relevant construction activities on site and will incorporate relevant mitigation measures and controls from management plans. EWMS are specifically designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions.

EWMS will be prepared progressively in the lead up to and throughout construction in consultation with relevant members from the Development team. All construction personnel and sub-contractors undertaking a task governed by an EWMS must participate in training on the EWMS and acknowledge that they have read and understood their obligations prior to commencing work.

Regular monitoring, inspections and auditing against compliance with the EWMS will be undertaken by Development personnel to verify that all controls are being followed and that any non-compliances are recorded, and corrective actions implemented (see Section 4 of this CEMP for further detail).

### **2.3.4. Environmental and Sustainability Forms**

Each Construction Contractor is required to prepare their own environmental monitoring or management forms and checklists, relevant to their works. Where forms or checklists have been included within this CEMP or sub-plans, these are indicative and can be replaced with contractor-specific forms. The relevant Construction Contractor must provide environmental and sustainability forms, registers and/or checklists to the Principal's Representative for review prior to commencement of works. The forms, registers and/or checklists must include the relevant minimum specified content within the contractor-specific forms.

At a minimum the following are to be developed:

- Development induction and training register
- Weekly environmental inspection
- Water discharge permit
- Noise and vibration monitoring form
- Air quality monitoring form
- Water quality monitoring form
- Corrective actions register
- Waste monitoring register
- Incident register
- Pre-clearing checklist
- Energy consumption register
- Water consumption register
- Materials register
- Clearing permit.

## **2.4. Document Control and Records**

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

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

Relevant sub-plans and EWMS will be issued to those personnel who are responsible for their implementation.

Documentation will be maintained in a legible manner, dated (with dates of revision) and readily identifiable. Development relevant documentation will be uploaded to the Development website in accordance with CoC C20.

## **2.5. Roles and Environmental Responsibilities**

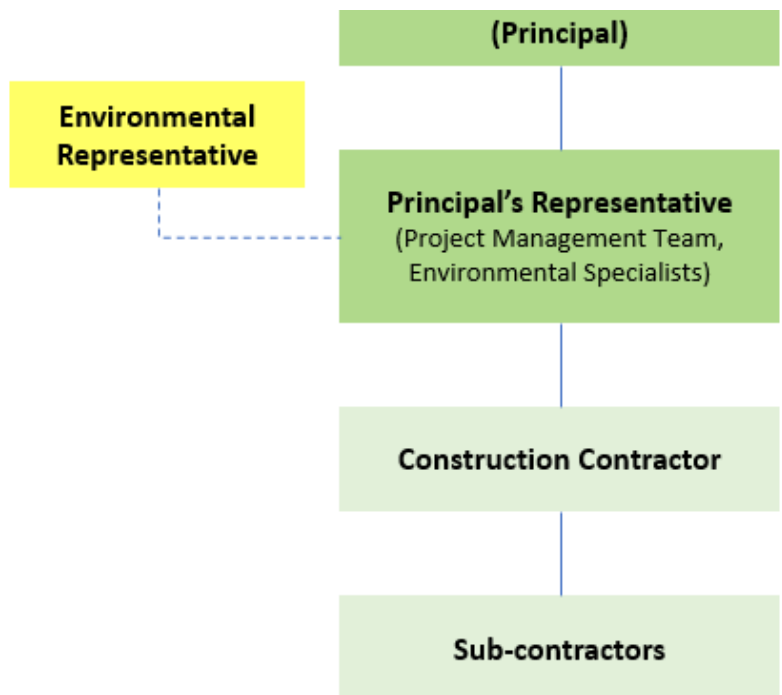
### **2.5.1. Construction Contractor**

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

The interaction between the key organisations involved in environmental management is displayed in Figure 2-4.



Figure 2-4 Organisational Chart



The key roles and responsibilities of relevant Development personnel are outlined below in Table 2-1. These roles are indicative only and the contractor may allocate the responsibilities across these roles. The Construction Contractor will provide roles and responsibilities and staff names to the Principal's Representative prior to the commencement of construction.

Table 2-1 Construction Contractor's Roles and Responsibilities

Role	Responsibility
<b>Contractor's Works package Manager (Contractor's WM)</b>	<ul style="list-style-type: none"> <li>• Include environmental consideration into all aspects of Development planning</li> <li>• Communicate to personnel responsibilities and authorities</li> <li>• Attend audit meetings and action results of any audit findings</li> <li>• Allocate Development resources to handle environmental issues</li> <li>• Oversee the implementation and maintenance of the CEMP</li> <li>• Endorse updated EWMS's</li> <li>• Appoint/nominate and provide support to the Contractor's EM</li> <li>• Report to senior management and the Principal's Representative on the performance of the system and non-compliances</li> <li>• Take action to resolve environmental non-compliances and incidents</li> <li>• Sign off on all environment and sustainability inspections</li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>• Inform suppliers and sub-contractors of the Development's environmental requirements</li> <li>• Report environmental incidents to the Principal Representative</li> <li>• Authorise expenditure to implement environmental management requirements within limits of authority as defined in the Principal's Representatives Development requirements</li> <li>• Undertake incident investigations</li> <li>• Review audit corrective actions and act as necessary to close out of issues</li> <li>• Be contactable 24 hours a day</li> <li>• Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm beyond that identified with in the EIS.</li> </ul>
<b>Contractor's Construction Manager (Contractor's CM)</b>	<ul style="list-style-type: none"> <li>• Communicating with all personnel and sub-contractors regarding compliance with the CEMP and site specific environmental issues/EWMS</li> <li>• Identifying resources required for implementation of the CEMP</li> <li>• Organise and manage site plant, labour and temporary materials</li> <li>• Co-ordinating the implementation and maintenance of site environmental controls and provide support for the Contractor's EM</li> <li>• Report all environmental incidents in accordance with incident reporting protocol</li> <li>• Undertake ICAM investigations</li> <li>• Take action to resolve non-compliances and incidents</li> <li>• Be contactable 24 hours a day</li> <li>• Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm beyond that identified with in the EIS.</li> </ul>
<b>Contractor Environmental Manager (Contractor's EM)</b>	<ul style="list-style-type: none"> <li>• Assist and guide the respective workers to meet their environmental responsibilities.</li> <li>• Check and monitor the implementation of this CEMP</li> <li>• Report to the Contractor's CM on environmental issues</li> <li>• Monitor the rectification of incidents</li> <li>• Provide technical advice to personnel and management in the review of work methods</li> <li>• Implement appropriate action to address any environmental incidents</li> <li>• Manage and investigate identified non-compliances to CoCs</li> <li>• Implementation, monitoring and updating of the CEMP and sub-plans</li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>Identify environmental risks and implement appropriate mitigation measures</li> <li>Develop environmental site induction and maintain a register of attendance</li> <li>Present and participate in toolbox meetings</li> <li>Manage environmental document control, reporting, inductions and training</li> <li>Oversee site monitoring, inspections and internal audits</li> <li>Undertake incident investigations</li> <li>Manage all sub-contractors and consultants with regards to environmental matters, including assessing their environmental capabilities, identifying additional training needs and overseeing the submission of their environmental documents</li> <li>Respond to stakeholder enquires/complaints within required timeframes</li> <li>Act as a 24-hour contact (if other staff as outlined above are not available)</li> <li>Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm</li> <li>Liaise with construction team as required to implement the ISCA requirements</li> <li>Submit energy and materials use data to the Principal using the Sustainability Online Data Collection Tool (SODCT)</li> <li>Cooperate and participate in audits and action results of any audit findings.</li> </ul>
<b>Site Supervisor</b>	<ul style="list-style-type: none"> <li>Implement environmental controls on-site</li> <li>Present and participate in toolbox talks and meetings</li> <li>Monitor the skills required by workers to effectively implement the CEMP and sub-plans</li> <li>Train staff in their obligations under EWMS</li> <li>Meet environmental reporting requirements of the Development</li> <li>Direct works to be performed in a more environmentally responsible manner that reduces impacts or stop works if there is a risk of environmental harm.</li> </ul>
<b>Development Manager (Communication) (DM Communication)</b>	<ul style="list-style-type: none"> <li>Implement the Community Consultation Strategy</li> <li>Assist the Contractor's EM in consulting regulatory agencies and community</li> <li>Communicate potential environmental impacts to the community and all stakeholders</li> <li>Manage the resolution of environmental complaints</li> <li>Act as a 24-hour contact (if other staff as outlined above are not available).</li> </ul>
<b>All Personnel</b>	<ul style="list-style-type: none"> <li>Minimise the potential of pollution of land, air and water</li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>• Preserve the natural and cultural heritage environment</li> <li>• Minimise the occurrence of offensive noise</li> <li>• Take all feasible and reasonable steps to comply with the requirements of this CEMP</li> <li>• Comply with the relevant Acts, Regulations and Standards</li> <li>• Comply with the Development's policies and procedures</li> <li>• Comply with the CEMP and sub-plans</li> <li>• Comply with lawful management directions</li> <li>• Promptly report to management on any non-compliances, environmental incidents and/or breaches of the system</li> <li>• Undergo induction and training in environmental awareness as directed by management</li> <li>• Report all incidents in accordance with reporting requirements outlined in this CEMP</li> <li>• Fulfil the General Environmental Obligations</li> <li>• Undertake works in a manner that will enable the Development to obtain the required ISCA As-built rating.</li> </ul>

#### 2.5.1.1. Contractor's Management Team

The Contractor's Management Team includes, as a minimum the Contractor's WM, Contractor's CM, Contractor's EM and Site Supervisor. The Contractor's Management Team will:

- Check the status and adequacy of the CEMP to confirm that it meets current client and contract requirements as well as relevant environmental standards
- Review environmental incident investigations reports and implement recommendations
- Identify any improvement opportunities to the delivery of construction and / or to the CEMP
- Assist to resolve any relevant complaints received.

#### 2.5.2. Sub-contractors

All sub-contractors are required to work in accordance with this CEMP. Prior to engagement, prospective sub-contractors are required to complete a sub-contractor questionnaire or similar that will consider their past environmental performance.

All sub-contractors are required to attend Development and/or site inductions where the requirements and obligations of the CEMP will be communicated. A record of all sub-contractors inducted would be maintained.

Monitoring of sub-contractors will be undertaken to assess:

- The sub-contractor's general work practices

- The implementation and effectiveness of the sub-contractor's environmental protection measures
- The sub-contractor's compliance with the requirements of the CEMP and their EWMS
- The maintenance and management of environmental control measures.

Monitoring may be part of a general Development wide review or targeted to a specific activity or sub-contractor.

### 2.5.3. Principal's Representative and Community Engagement Consultant

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

TSA Management is the Community Engagement Consultant (CEC) for LOGOS and will act as the 'controller' for all public communications; they will be the central contact to keep nearby residents informed of the progress of the Development. General responsibilities of the Principal's Representative and the CEC are outlined within Table 2-2.

Table 2-2 Principal's Representative's Roles and Responsibilities

Role	Responsibility
<b>LOGOS (Principal)</b>	<ul style="list-style-type: none"> <li>• Act as proponent for planning approvals and Development consent</li> <li>• Provide advice and leadership on environmental policy and regulation</li> </ul>
<b>Principal's Representative (Development Management Team and Environmental Specialists)</b>	<ul style="list-style-type: none"> <li>• Review the CEMP and sub-plans against all relevant regulatory and Development requirements</li> <li>• Review the Construction Contractor's environmental monitoring reports and compliance documentation to confirm that the CEMP and sub-plans are being implemented</li> <li>• Issue a stop work direction immediately where an unacceptable environmental impact may occur</li> <li>• Liaise with relevant regulators if an incident occurs, including necessary notifications, if required</li> <li>• Manage and implement the program of independent and internal audits of the system</li> <li>• Review audit outcomes and act as necessary</li> <li>• Review environmental performance through the monthly reporting cycle</li> <li>• To manage all aspects of the contract between LOGOS and the Construction Contractor</li> <li>• Compile and submit compliance status to the Secretary (e.g. pre-construction and quarterly compliance reports for the Development).</li> </ul>
<b>Community Engagement</b>	<ul style="list-style-type: none"> <li>• Preparing and coordinating content for the Development website, newsletters, factsheets, etc.</li> </ul>

**Consultant (CEC) (TSA Management)**

- Working with subcontractors in the organisation and delivery of community information sessions
- Reviewing subcontractor community relations materials, including notifications, letters, advertising, signs and factsheets
- Monitoring, responding to and triaging Development calls and emails
- Preparing overarching Development key messages
- Managing the calendar of all Development communication and engagements activities
- Coordinating regular subcontractor communications meetings
- Liaising with LOGOS on all of the above.

#### 2.5.4. Environmental Representative

The primary role of the ER is to independently oversee compliance with the Development Consent. The nominated ER(s) must be submitted to the Secretary for approval no later than one month prior to the commencement of construction, in accordance with CoC C22 and C23 and engaged for the duration of construction.

The role of the ER is specified in CoC C24:

- On behalf of the Applicant, receive and respond to communication from the Secretary in relation to the environmental performance of the Development.
- Consider and inform the Secretary on matters specified in the terms of this consent.
- Consider and recommend any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community.
- Review the following documents required to be prepared under the terms of this consent, ensure they are consistent with requirements in or under this consent and if so, endorse them prior to submission to the Secretary (if required to be submitted to the Secretary) or prior to implementation (if not required to be submitted to the Secretary):
  - (i) CEMP;
  - (ii) OEMP; and
  - (iii) the other plans and sub-plans required by these conditions, and referenced in conditions C1 and C3.
- Regularly monitor the implementation of all documents required to be prepared under the terms of this consent to ensure implementation is being carried out in accordance with what is stated in the document and the terms of this consent.
- As may be requested by the Secretary, help plan, attend or undertake Department audits of the Development including scoping audits, programming audits, briefings, and site visits, but not independent audits required under condition C18 of this consent.
- If conflict arises between the Applicant and the community in relation to the environmental performance of the Development, attempt to resolve the conflict, and if it cannot be resolved, notify the Secretary.

- Consider any minor amendments to be made to the CEMP, CEMP sub-plans and monitoring programs that comprise updating or are of an administrative nature, and are consistent with the terms of this consent and the CEMP, CEMP sub-plans and monitoring programs approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this consent.
- Prepare and submit to the Secretary and other relevant regulatory agencies, for information, a monthly Environmental Representative Report detailing the ER's actions and decisions on matters for which the ER was responsible in the preceding month (or other timeframe agreed with the Secretary). The Environmental Representative Report must be submitted within seven (7) days following the end of each month for the duration of construction of the Development, or as otherwise agreed with the Secretary.

## **2.6. Legislative Requirements**

The regulatory framework for the Development is outlined within the Legislation Register, (Appendix A). This register identifies relevant legislative instruments, their key objectives and relevance to the Development, including legislative obligations.

The Development will comply with all relevant guidelines, standards, codes and legislation as outlined within the following sections and Appendix A and Appendix B of this CEMP.

A copy of this approved CEMP and all relevant permits, licences and Development approvals relevant to the Development activities will be kept at the Construction Contractor's offices and shall be readily available for perusal by relevant regulatory officers or the Certifying Authority.

### **2.6.1. Development Approvals**

The Development has been approved under both the EP&A Act and the EPBC Act. Both these approvals have environmental conditions relevant to the construction works for the Development, which are discussed below.

### 2.6.1.1. MPE EPBC Act Approval (2011/6229)

The EPBC Act approval for the MPE Concept was granted by DCCEEW in March 2014 (No. 2011/6229). This approval was provided for the impact of the MPE Development 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 approval was subsequently varied on the 27 June 2022 by Department of Agriculture, Water and the Environment to include revised management plan conditions.

The construction and operation of the Development has been designed to be consistent with the EPBC Act Approval conditions, where relevant. EPBC Act Approval conditions for the Development includes specific conditions and commitments that are required to be addressed in this CEMP. These conditions and how they have been addressed are identified within Table 2-3.

Table 2-3 EPBC Act Approval (2011/6229)

Condition	Requirement	CEMP Section
7a)	Details on the timing of the construction works (accompanied by current and detailed maps)	Section 1.5
7b)	Identification and quantification of all potential impacts associated with noise, vibration, air quality, traffic, light spill, hydrological changes, contamination, and indigenous heritage (including cumulative impacts associated with the separately approved but related and adjacent intermodal terminal facility project, EPBC approval 2011/6086) upon Commonwealth land. Consideration must be given to people and communities at SME, DNSDC, Defence housing, and the environment more generally in neighbouring bushland areas. Of note, the air quality assessment must quantify all emissions of PM2.5 and PM10 arising from project-related sources identified in the EIS.;	This CEMP and relevant aspect specific sub-plans, and Appendix P – Light Spill Management Plan Note: The School of Military Engineering (SME) and Defence housing have been relocated off the MPW Site to the Holsworthy Barracks and are no longer sensitive receivers to the MPE Site. The DNSDC has been relocated to the DJLU, to the north of the MPE Site, and is listed as a sensitive receiver in aspect specific sub-plans.
7c)	Results of further investigations with regard to land contamination and indigenous heritage impacts (specifically PADS 2 and 3)	Refer to Appendix K – Construction Heritage Management Plan (CHMP) and Appendix N – Contamination Management Plan (CMP)
7d)	Refined details (including implementation timeframes) for the mitigation measures outlined in the EIS (Sections 7.4.2, 7.4.3, 7.4.6, 7.4.7, 7.4.8, 7.4.9) and summarised at Annexure A	Relevant sub-plan



Condition	Requirement	CEMP Section
		MPE Stage 2 Urban Design and Landscape Plan – Lighting sub-plan addresses light spill
7e)	A commitment to ensure no lights are installed above the height of 40 metres or, the maximum approved height of the intermodal warehouse buildings (whichever is less);	Appendix P – Light Spill Management Plan
7f)	Identification of the trigger values and criteria for all matters mentioned in condition 7(b) (excluding light spill, land contamination and indigenous heritage) that will be adopted for monitoring and managing potential impacts to Commonwealth land;	Relevant sub-plan
7g)	Details of a comprehensive monitoring program (including locations, frequency and duration) for: 1. validating the anticipated impacts associated with condition 7(b); and 2. determining the effectiveness of proposed mitigation / management measures;	Relevant sub-plan, Appendix P – Light Spill Management Plan
7h)	Provisions to revise the approved CEMP in response to monitoring associated with condition 7(g) including, details of response / contingency mechanisms to address any exceedances of the relevant trigger values;	Section 1.3.7
7i)	Evidence of consultation with Defence regarding the adequacy of proposed mitigation measures in particular, those measures to mitigate potential light spill impacts upon residential dwellings within SME outside of standard construction hours; and	Section 1.3.4, Appendix P – Light Spill Management Plan Note: The School of Military Engineering (SME) and Defence housing have been relocated off the MPW Site to the Holsworthy Barracks and are no longer sensitive receivers to the MPE Site.
7j)	Details of a complaints handling procedure;	Appendix R – Construction Community Communication Strategy (CCCS)

### 2.6.1.2. MPW EPBC Act Approval 2011/6086

The EPBC Act approval for the MPW Concept was granted by DCCEEW in September 2016 (No. 2011/6086). This approval was provided for the impact of the MPW Development 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 Moorebank Avenue upgrade works will be performed under the MPE Stage 2 Consent as described in Section 1.1 and 1.4. Since the western side of the Moorebank Avenue upgrade works construction footprint is located in an existing area of hardstand within the MPW site, the works must comply with the MPW Commonwealth Approval. Table 2-4 outlines how the relevant conditions have been addressed in preparing this CEMP.

Table 2-4 EPBC Act Approval (2011/6086)

Condition	Requirement	CEMP Section
2	For the protection of the environment, including listed threatened species and communities, the person taking the action must prepare a construction environmental management plan (CEMP) addressing at least the elements outlined in Conditions 5 to 13. Apart from early works as described in Condition 3, construction must not commence until all specified CEMP approvals have been obtained in writing, and once approved, the CEMP must be implemented.  The CEMP may be prepared in stages, in which case the corresponding stage must be clearly defined, and construction of that stage must not commence until all specified approvals have been obtained in writing.	This Plan
2B	The CEMP corresponding to the stage that is confined to the upgrade of <b>Moorebank Avenue</b> is exempt from the requirements of condition 8(d).	Noted.
3	For the protection of the environment, including listed threatened species and communities, the person taking the action must ensure that early works are undertaken in accordance with SSD 5066 and comply with the measures described in Condition 8 wherever perfluoroalkyl substance (PFAS) contamination is identified.	Not applicable to this plan as early works is not in the scope of works Addressed in the MPW PFAS Management Plan
3A	For the protection of the environment, including listed threatened species and communities, the person taking the action must implement the following for the stage that is confined to the upgrade of <b>Moorebank Avenue</b> :	Addressed in the Contamination Management Plan – Moorebank Avenue Upgrade Works.

Condition	Requirement	CEMP Section
	<ul style="list-style-type: none"> <li>a) comprehensively sample the soil, sediment, surface water, groundwater, and other material at <b>Moorebank Avenue</b> for PFAS contamination prior to any construction commencing. Sampling must be consistent with the requirements set out in the <b>Assessment of Site Contamination NEPM</b> and sufficient to delineate any site contamination (with 95% confidence). PFAS must be analysed in samples at ultratrace level and reported in accordance with guidance set out in the <b>PFAS NEMP</b>;</li> <li>b) record the origin, nature, volume, concentrations and masses of PFAS contaminants, source location, and intended placement location of soil and other materials imported to <b>Moorebank Avenue</b>;</li> <li>c) analyse and record the origin, nature, volume, concentrations and masses of PFAS contaminants, of soil, sediment, water and other materials taken, excavated, extracted or discharged from within <b>Moorebank Avenue</b>, at an appropriate frequency to allow for effective management intervention;</li> <li>d) record the source location, and intended disposal destination of soil, sediment, water and other materials taken, excavated, extracted or discharged from within <b>Moorebank Avenue</b>;</li> <li>e) not infiltrate, recharge, discharge, or re-use water arising from dewatering if the mean concentrations of PFAS contaminants exceed the ecosystem freshwater guideline values for the 95% species protection set out in the <b>PFAS NEMP</b>;</li> <li>f) treat water in (d) above the limits set in (e) to remove the PFOS and PFOA content at or below these limits before being infiltrated, recharges or discharged<sup>2</sup>;</li> <li>g) manage, treat, remediate, or dispose of any soil with concentrations of PFOS, PFHxS, or the sum of PFOS+PFHxS greater than 0.01 mg/kg and below 50 mg/kg or ppm, and / or concentrations of PFOA greater than 0.3 mg/kg and below 50mg/kg or ppm, in accordance with the <b>PFAS NEMP</b>;</li> <li>h) in accordance with the <b>PFAS NEMP</b>, treat, remediate, completely contain, or destroy and PFAS - contaminated material including water and excavated soil, with a PFOS, PFOA, or PHHxS content about 50 milligrams per kilogram (mg/kg or ppm) such that PFAS contaminants are prevented from entering the environment;</li> <li>i) not re-use excavated and extracted materials and sediments until the conditions in (g) and (h) are met. Temporary or long-term stockpiling of soils, sediments and materials, such as [sic] while analysis is undertaken, must be in accordance with guidance set out in the <b>PFAS NEMP</b>.</li> </ul>	
5	Sections of the CEMP and OEMP relating to traffic must be prepared by a suitably qualified expert and must:	Addressed in Appendix E – Construction Traffic and Access

<sup>2</sup> It is recognised that there may be operational constraints on treatment plant process that mean treatment levels may vary over time. With this in mind water must not be re-infiltrated if it is more than 50% above the limit (ie 0.195 µg/L and 330 µg/l).

Condition	Requirement	CEMP Section
	<ul style="list-style-type: none"> <li>a) Be consistent with the Traffic, Transport and Access Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>b) incorporate all measures 4A to 4Q from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>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</li> <li>d) be approved by the Minister or a relevant New South Wales regulator.</li> </ul>	Management Plan (CTAMP) CTAMP-B
6	<p>Sections of the CEMP and OEMP relating to noise and vibration must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the Noise and Vibration Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>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'</li> <li>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</li> <li>d) be approved by the Minister or a relevant New South Wales regulator.</li> </ul>	Addressed in Appendix J – CNVMP
7	<p>Sections of the CEMP and OEMP relating to biodiversity must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the Biodiversity Provisional Environmental Management Framework (3 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>b) incorporate all measures 6A to 6R, 6T, 6V and 6X from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>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</li> <li>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 be approved by the Minister.</li> </ul>	Addressed in Appendix L – CFFMP
8	<p>Sections of the CEMP and OEMP relating to contamination and soils must be prepared by a suitably qualified expert and must:</p>	Addressed in the MPW PFAS Management Plan

Condition	Requirement	CEMP Section
	<ul style="list-style-type: none"> <li>a) be consistent with the Soils and Contamination Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>b) incorporate all measures 7A to 7K, and BA to BAA, from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>c) explain how all measures 7A to 7K, and BA to BAA, from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed</li> <li>d) in relation to management of PFAS: <ul style="list-style-type: none"> <li>i. be consistent with: <ul style="list-style-type: none"> <li>▪ National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013)</li> <li>▪ 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</li> <li>▪ relevant Commonwealth environmental management guidance on PFOS and PFOA</li> </ul> </li> <li>ii. detail implementation and operational procedures, appropriate to the risk posed by any contamination, including: <ul style="list-style-type: none"> <li>▪ roles and responsibilities</li> <li>▪ management of potential PFAS contaminated sites as yet un-investigated</li> <li>▪ management of areas of known PFAS contamination, including strategies to reduce runoff, dewatering and migration of contamination across and off the proposed site</li> <li>▪ a contingency action plan for unexpected PFAS contaminant discoveries</li> </ul> </li> <li>iii. detail soil, groundwater and surface water PFAS contamination monitoring requirements and testing and disposal procedures appropriate to the risk posed by any contamination</li> <li>iv. include requirements for site validation reports appropriate to the risk posed by any contamination</li> <li>v. include requirements for remedial action plans appropriate to the risk posed by any contamination</li> <li>vi. detail review procedures appropriate to the risk posed by any contamination</li> <li>vii. impose the following performance measures for managing earthworks and the potential for effects to occur due to disturbance of PFAS contaminated soil</li> <li>viii. during construction: <ul style="list-style-type: none"> <li>▪ contaminated sediment to be discharged outside the site of the action to be minimised</li> <li>▪ 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</li> </ul> </li> </ul> </li> </ul>	Condition 8(d) not applicable (see Condition 2B)

Condition	Requirement	CEMP Section
	<p>environmentally sound manner such that potential for the PFAS content to enter the environment is minimised</p> <ul style="list-style-type: none"> <li>▪ 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</li> <li>▪ all soil remaining at the site of the action to be suitable for purpose.</li> </ul> <p>e) be approved by the Minister.</p>	
9	<p>Sections of the CEMP and OEMP relating to water must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the Water Quality, Storm water and Flooding Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>b) incorporate all measures 9A to 9AG from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>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</li> <li>d) be approved by the Minister or a relevant New South Wales regulator.</li> </ul>	Addressed in Appendix G – CSWMP
10	<p>Sections of the CEMP and OEMP relating to air quality must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the Air Quality Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>b) incorporate all measures 10A to 10U (CEMP only) and 1 OV to 10AH and 11 A to 11 H (OEMP only) from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>c) explain how all measures 10A to 10U (CEMP only) and 10V to 10AH and 11A to 11 (OEMP only) from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed</li> <li>d) be approved by the Minister or a relevant New South Wales regulator.</li> </ul>	Addressed in Appendix I – CAQMP
11	<p>Sections of the CEMP and OEMP relating to Aboriginal heritage must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the Aboriginal Heritage Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> </ul>	Addressed in Appendix K - CHMP

Condition	Requirement	CEMP Section
	<ul style="list-style-type: none"> <li>b) incorporate all measures 12A to 12G from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>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</li> <li>d) be approved by the Minister or a relevant New South Wales regulator.</li> </ul>	
12	<p>Sections of the CEMP and OEMP relating to European heritage must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the European Heritage Provisional Environmental Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>b) incorporate all measures 13A to 13M from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>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</li> <li>d) be approved by the Minister or a relevant New South Wales regulator.</li> </ul>	Addressed in Appendix K - CHMP
13	<p>Sections of the CEMP and OEMP relating to visual impacts (including light spill) must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the Light Spill Provisional Environmental Management Framework (2 July 2014), provided at Appendix 0 to the finalised EIS</li> <li>b) incorporate all measures 14A to 14H from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>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</li> <li>d) be approved by the Minister or a relevant New South Wales regulator.</li> </ul>	<p>Addressed in Appendix C – Aspects and Impacts Register (see visual category) excluding 14C which is not applicable to the MPE Site.</p> <p>Also addressed in the MPE Stage 2 Urban Design and Landscape Plan (UDLP)</p>
14	<p>To address residual impacts on protected biodiversity values, including listed threatened species and communities, the person taking the action must finalise a biodiversity offset strategy (BOS). The BOS must be approved in writing within twelve (12) months of commencement of early works, by a relevant New South Wales regulator, and once approved must be implemented. The BOS must be prepared by a suitably qualified expert and must:</p> <ul style="list-style-type: none"> <li>a) be consistent with the biodiversity offsets strategy provided at Appendix E to the finalised EIS</li> </ul>	Addressed in the Moorebank Precinct East – Biodiversity Offset Strategy

Condition	Requirement	CEMP Section
	<ul style="list-style-type: none"> <li>b) incorporate all measures 6S, 6U, 6W and 6Y to 6AA from Table 7.1 of the finalised EIS that are described as 'mandatory'</li> <li>c) incorporate all measures 6S, 6U, 6W and 6Y to 6AA from Table 7.1 of the finalised EIS that are described as 'subject to review' or justify any alternative protocols</li> <li>d) offset impacts on protected biodiversity values including listed threatened species and communities in accordance with the FBA</li> <li>e) include map(s) and shapefiles that identify the location and boundaries of all offset sites</li> <li>f) be approved by a relevant New South Wales regulator, and also by the Minister if the BOS does not involve the protection and management in perpetuity of the 'Casula', 'Moorebank' and 'Wattle Grove' Offset Areas identified at Annexure 2.</li> </ul>	

### 2.6.1.3. EP&A Act Approval

The Development is being delivered under Part 4, Division 4.1 (Division 4.1 prior to 01 March 2018) of the EP&A Act. The CoCs include requirements to be addressed in this CEMP and delivered during the Development. These requirements, how they are addressed, along with division of responsibilities is provided within Table 2-5, prepared in accordance with CoC C21.

Table 2-5 Conditions of Consent (CoCs)

CoC	Relevant Requirement	CEMP Section	How Addressed
A1	In addition to meeting the specific performance measures and criteria established under this consent all reasonable measures must be implemented to prevent, and if prevention is not reasonable, minimise, any harm to the environment that may result from the construction and operation of the Project, and any rehabilitation required under this consent.	Section 3 Section 4	<p>Section 3 of this CEMP identifies the management measures to be implemented to prevent and minimise environmental harm. Aspect-specific management measures are also identified in each sub-plan required under this CEMP.</p> <p>Section 4 sets out the processes for monitoring and reviewing the effectiveness of these management measures. Opportunities to further minimise environmental harm will be identified through the ongoing evaluation of environmental management performance and effectiveness of this plan.</p>
A2	The Project may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Secretary in relation	This plan	This CEMP and associated sub-plans have been developed to comply with the Conditions of Consent (CoCs), written directions of the Secretary, amended Development layout



CoC	Relevant Requirement	CEMP Section	How Addressed
	to this consent; (c) in accordance with the EIS, Submissions Report, Consolidated assessment clarification responses and updated Biodiversity Assessment Report; (d) in accordance with the amended Project Layout Plans and Design Plans, amended WSUD plans and amended architectural plans to be submitted for the Secretary's approval as part of this consent; and (e) in accordance with the management and mitigation measures at APPENDIX B of this consent.		and management and mitigation measures outlined in Appendix B of the CoCs.
A15	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage of the Project to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program	Section 1.3.2	This CEMP is relevant to construction only.
A18	The date of commencement of each of the following phases of the Project must be notified to the Department, at least one month before that date:  (a) early works; (b) fill importation; (c) construction; (d) operation; and (e) occupation.  If the construction, operation or occupation of the Project is to be staged, then the Applicant must notify the Department in writing at least one month before the commencement of each stage, and clearly identify the Project to be carried out in that stage.	Section 1.3.5	The date of commencement for the construction phase will be notified to DPHI at least one month before work begins.
A19	Where conditions of this consent require a document to be prepared in consultation with an identified party, the Applicant must:	Section 1.3.4 Appendix P	This CEMP and associated sub-plans have been developed in consultation with the identified parties.

CoC	Relevant Requirement	CEMP Section	How Addressed
	<p>(a) consult with the relevant party prior to submitting the subject document to the Secretary for approval;</p> <p>(b) provide evidence that at least two weeks was provided for the relevant party to comment on the document; and</p> <p>(c) include in the document:</p> <p>(i) details of the consultation undertaken;</p> <p>(ii) a description of how matters raised by those consulted have been resolved to the satisfaction of both the Applicant and the party consulted; and</p> <p>(iii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>		
A20	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the Project. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits, approvals and consents.	Section 2.5.2	<p>All applicable licences, permits and approvals will be obtained as required.</p> <p>Approvals, permits and licences required for the Development are discussed in Section 2.6.2, Appendix A and Appendix B.</p>
A27	Before the construction of any utility works associated with the Project, approvals required from service providers must be obtained.	Section 2.6.2.2	Utilities connections for the Development will be from the MPE Stage 1 site and approvals from utilities providers will not be required.
A28	Prior to operation of the Project, a compliance certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994 must be obtained.	Section 2.6.2.2 Appendix A – Legislation Register	A compliance certificate under Section 73 of the Sydney Water Act 1994 for water and sewerage infrastructure servicing of the site will be obtained.
A32	<p>All plant and equipment used at the site or to monitor the performance of the Project must be:</p> <p>(a) maintained in a proper and efficient condition; and</p>	Aspect-specific sub-plans (e.g. CAQMP, CNVMP)	All plant and equipment used at the site or to monitor the performance of the Development will be maintained and operated in a proper and efficient manner.

CoC	Relevant Requirement	CEMP Section	How Addressed
	(b) operated in a proper and efficient manner.		
B1	<p>The Applicant must:</p> <p>(a) prepare each plan, program and other documents in consultation with the specified stakeholders;</p> <p>(b) not commence each phase of the project until the plans, programs and other documents required under this consent are approved by or, where not required to be approved, submitted to the Secretary specified within the timeframes; and</p> <p>(c) implement the most recent version of the required plans and programs approved by the Secretary for the duration of the Project.</p>	<p>Section 1.3.4</p> <p>Section 1.3.5</p> <p>Appendix P</p>	<p>This CEMP and associated sub-plans, programs and documents in consultation with identified stakeholders.</p> <p>This CEMP and associated sub-plans will be submitted to the Secretary, and approved, where required, prior to the commencement of construction.</p> <p>Construction will be undertaken in accordance with the most recent, approved version of this CEMP and associated sub-plans.</p>
B2	<p>Prior to commencement of early works and construction, the Applicant must prepare a Construction Traffic and Access Management Plan (CTAMP) to the satisfaction of the Secretary.</p> <p>...</p>	Appendix E	<p>A CTAMP has been prepared to address the requirements of this condition.</p>
B19	<p>The Applicant is responsible for all works required by public utility adjustment/relocation works necessitated by the road infrastructure upgrade works and as required by the various public utility authorities and/or their agents.</p>	Section 2.6.2.2	<p>Public utility works involving adjustment / relocations works will be undertaken by the Construction Contractor who will be responsible for the approval / agreement of the utility service provider prior to the works.</p>
B31	<p>The applicant must prepare a Concrete Batching Plant Management Plan to the satisfaction of the Secretary. The plan must be approved by the Secretary prior to the establishment of Concrete Batching Plant and form part of the CEMP required by condition C1.</p> <p>...</p>	Appendix F	<p>Concrete Batching Plant Management Plan (Appendix F) will be prepared to address the requirements of this condition prior to the establishment of the Concrete Batching Plant.</p>
B34	<p>Prior to early works, fill importation or any other surface disturbance, the Applicant must prepare a Soil and Water Management Plan (SWMP) to the satisfaction of the Secretary.</p>	Appendix G	<p>A Construction Soil and Water Management Plan (CSWMP; Appendix G) has been prepared to address the requirements of this condition.</p>

CoC	Relevant Requirement	CEMP Section	How Addressed
	...		
B52	Before the commencement of construction, the Applicant must prepare a Flood Emergency Response Plan to the satisfaction of the Secretary. The Plan must form part of the CEMP and OEMP required by conditions C1 and C3 and must: ...2.6.2.2	Appendix H	A Flood Emergency Response Plan (Appendix H) has been prepared to address the requirements of this condition.
B57	The Applicant must prepare a Construction Air Quality Management Plan (AQMP) to the satisfaction of the Secretary. ...	Appendix I	A Construction Air Quality Management Plan (CAQMP; Appendix I) has been prepared to address the requirements of this condition.
B60	The Applicant must ensure the Project does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Appendix A	The Development will not cause or permit the emissions of any offensive odour, as defined in the POEO Act.
B64	Continuous noise monitoring at sensitive receivers must be undertaken during early works, fill importation, construction and for at least 12 months following occupation of the entire site.	Appendix J	A Construction Noise and Vibration Management Plan (CNVMP; Appendix J) has been prepared to address the requirements of this condition.
B65	The construction hours detailed in Table 2 must be complied with, except where they may be undertaken under condition B66. ..	Section 1.6	Hours of the activities associated with construction are able to be undertaken according to Section 1.6.
B66	Except as permitted by an EPL, activities resulting in high noise impact (including impulsive or tonal noise emissions) must only be undertaken: (a) between the hours of 8:00 am to 5:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) in continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block.	Section 1.6	Activities resulting in high noise impact (including impulsive or tonal noise emissions) must only be undertaken in accordance with the condition. An Environmental Protection Licence (EPL) (No. 21054) was issued by the EPA on 4 June 2018. The licence applies to the Moorebank Precinct areas identified in the Licence's premises map condition. Scheduled activities include crushing, grinding or separating, and contaminated soil treatment. The licence enables the importation of material classified under a Resource Recovery

CoC	Relevant Requirement	CEMP Section	How Addressed
	<p><i>Note:</i></p> <p><i>For the purposes of this condition, 'continuous' includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work that is the subject of this condition.</i></p>		Order where the onsite use (approved land use) is consistent with the applicable Resource Recovery Exemption
B67	<p>Works may be undertaken outside the hours detailed in Table 2 in the following circumstances:</p> <p>(a) for the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons;</p> <p>(b) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm;</p> <p>(c) where different construction hours are permitted or required under an EPL in force in respect of construction, in which case these construction hours must be complied with;</p> <p>(d) where they are undertaken in accordance with an Out-Of-Hours Work Protocol detailing the assessment, management and monitoring of noise as part of the Construction Noise and Vibration Management Plan.</p>	<p>Section 1.6</p> <p>Appendix J</p>	Out of hours works may occur during construction. The protocol is included in Appendix J.
B68	<p>The Applicant must prepare an Out-Of-Hours Work Protocol for any work undertaken outside the hours specified in condition B64 or outside the circumstances specified under condition B66. An Out-Of-Hours Work Protocol must provide for the assessment, management and monitoring of out of hours work noise including:</p> <p>(a) where works are shown to be inaudible at the nearest sensitive receivers and vibration levels do not exceed those stipulated by Table 2.2 and Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006);</p> <p>(b) where a negotiated agreement has been arranged with affected receivers;</p>	Appendix J	Out-of-Hours works may occur during construction. The protocol is included in Appendix J.

CoC	Relevant Requirement	CEMP Section	How Addressed
	<p>(c) where noise can be shown to satisfy the noise management levels specified in the Interim Construction Noise Guideline (ICNG, DECC, 2009) at non-residential land uses; or</p> <p>(d) where works are undertaken as part of an Extended Hours Work Plan approved as part of the Out-Of-Hours Work Protocol.</p>		
B69	<p>An Extended Hours Work Plan will be prepared for any construction undertaken during the extended hours detailed in Table 3 as required by condition B67(d). The Extended Hours Work Plan must provide for:</p> <p>(a) a three month assessment period, commencing at the start of extended hours construction works;</p> <p>(b) implementation of the Construction Noise and Vibration Management Plan;</p> <p>(c) noise monitoring at a representative number of sensitive receivers (including closest and furthest) to confirm the predicted noise levels;</p> <p>(d) targeted consultation with the noise affected sensitive receivers;</p> <p>(e) notification of the relevant Council, local residents and other affected stakeholders and sensitive receivers of the timing and duration at least 48 hours prior to the commencement of the works.</p> <p>(f) construction work timeframes and methods for investigation of noise complaints;</p> <p>(g) submission of monthly complaints reports to the Department for the life of extended hours activities;</p> <p>(h) continual refinement of mitigation measures based on consultation with the noise affected sensitive receivers;</p> <p>(i) implementation of work practices set out in section 5.2 of the ICNG;</p> <p>(j) a final summary report submitted to the Secretary at the end of the assessment period in subcondition (a), detailing the outcomes of the assessment period, the resolution of complaints during the assessment</p>	Appendix J	Extended Hours may occur during construction. The Extended Hours Work Plan is detailed in Appendix J

CoC	Relevant Requirement	CEMP Section	How Addressed
	period, and demonstrate the acceptability of works outside standard hours.		
B78	Blasting is not permitted on the site	Appendix J	No blasting will be undertaken for the Development.
B92	Prior to commencement of Early Works and Fill Importation, the Applicant must prepare a Heritage Management Plan, to the satisfaction of the Secretary. ...	Appendix K	A Construction Heritage Management Plan (CHMP; Appendix K) has been prepared to address the requirements of this condition. The plan has been prepared by a suitably qualified person and identified stakeholders have been consulted in the Development of this plan.
B108	Prior to clearing of native vegetation, the Applicant must prepare a Construction Flora and Fauna Management Plan (CFFMP) in consultation with OEH. The CFFMP must form part of the CEMP required by condition C1 and must include the following:	Appendix L	A Construction Flora and Fauna Management Plan (CFFMP; Appendix L) has been prepared to address the requirements of this condition.
B118	Prior to the commencement of early works, the Applicant must prepare a Construction and Demolition Waste Management Plan for the Project to the satisfaction of the Secretary. ...	Appendix M	A Construction and Demolition Waste Management Plan (CDWMP; Appendix M) has been prepared to address the requirements of this condition.
B134	Prior to early works and fill importation, a Contamination Management Plan must be prepared to the satisfaction of the Secretary and form part of the CEMP required under condition C1. ...	Appendix N	A Contamination Management Plan (CMP; Appendix N) has been prepared to address the requirements of this condition.

CoC	Relevant Requirement	CEMP Section	How Addressed
B139	<p>Prior to commencement of permanent built surface works and/or landscaping, or as otherwise agreed by the Secretary, an Urban Heat Island (UHI) Mitigation Strategy must be prepared and submitted to the Secretary for approval, in consultation with the NSW Government Architect. The UHIMS must be prepared by a suitably qualified and experienced person(s).</p> <p>...</p> <p>The UHI Mitigation Strategy must:</p> <p>d) details of where and how recommendations from the UHI Mitigation Strategy have been incorporated into the:</p> <p>i) CEMP required by condition C1</p>	Section 1.4.3	UHIMS will be constructed or installed in accordance with relevant design drawings and specifications during Construction Phase A.
B143	<p>Before the commencement of construction, the Applicant must ensure that a Bushfire Emergency and Evacuation Plan is prepared. The Plan must form part of the CEMP and OEMP required by conditions C1 and C3 and must:</p> <p>be prepared by a suitably qualified and experienced person(s);</p> <p>be consistent with the <i>Project Planning – A Guide to Developing a Bushfire Emergency Management and Evacuation Plan</i>, December 2014 and <i>Australian Standard AS3745 2010 Planning for Emergencies in Facilities</i>; and</p> <p>a copy of the plan must be submitted to the Secretary, NSW Rural Fire Service, Council and the Certifying Authority prior to occupation</p>	Appendix O	A Bushfire Emergency and Evacuation Plan (Appendix O) has been prepared to address the requirements of this condition.
B148	<p>Prior to establishment of any ancillary facility that is not identified by description and location in the documents listed in A2 that satisfies the criteria in condition B148, the Applicant must prepare and implement an Ancillary Facilities Management Plan which outlines the environmental management practices and procedures for the establishment and operation of the ancillary facility. The Ancillary Facilities Management Plan must be prepared in consultation with the relevant council and submitted to the Secretary for approval one month prior to installation of</p>	Ancillary Facilities Management Plan	An Ancillary Facilities Management Plan has been prepared to address the requirements of this condition.



CoC	Relevant Requirement	CEMP Section	How Addressed
	ancillary facilities. The Ancillary Facilities Management Plan must detail the management of the ancillary facilities and include: ...		
B155	No later than one month before early works and fill importation, a Community Communication Strategy must be prepared and submitted to the Secretary for approval. ...	Appendix R	A Community Communication Strategy has been prepared to address the requirements of this condition and is attached to this CEMP as Appendix R.
	Before the commencement of construction, a Construction Environmental Management Plan (CEMP) must be prepared to the satisfaction of the Secretary. The CEMP must:	This CEMP Section 1.3.5	This CEMP has been prepared to meet the Development's regulatory and policy requirements in a systematic manner and to continually improve the Development's environmental performance.  The nominated sub-plans have been prepared in accordance with the applicable CoCs.
	(a) identify the statutory approvals required to carry out the Project;	Section 2.5 Appendix A Appendix B	Legislation, permits and licences applicable to the Development have been identified within this CEMP.
C1	(b) outline all environmental management practices and procedures to be followed during construction works associated with the Project;	Section 2 Section 3 Individual aspect-specific sub-plans	Section 2 and Section 3 of this CEMP include environmental management practices and procedures to be followed during construction.  Aspect-specific sub-plans will include additional detail. Refer to Aspect and Impacts Register (Appendix C) for identified environmental aspects and a reference to the relevant aspect-specific sub-plans, where appropriate.
	(c) describe all activities to be undertaken on the site during construction of the Project, including a clear indication of construction stages;	Section 1.4	Activities to be undertaken on site during construction are identified in Section 1.4 of this CEMP.

CoC	Relevant Requirement	CEMP Section	How Addressed
	(d) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts;	Section 4 Individual aspect-specific sub-plans	Environmental performance of the Development will be monitored in accordance with Section 4 of this CEMP, and in accordance with the monitoring activities identified in the relevant aspect-specific sub-plans.
	(e) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Project; and	Section 2.5	Roles and responsibilities of key personnel have been nominated in Section 2.5 of this CEMP.
	(f) include the management plans required under this approval, including:  (i) Construction Traffic and Access Management Plan; (ii) Concrete Batching Plant Management Plan; (iii) Soil and Water Management Plan; (iv) Flood Emergency Response Plan; (v) Construction Air Quality Management Plan; (vi) Construction Noise and Vibration Management Plan; (vii) Heritage Management Plan; (viii) Construction Flora and Fauna Management; (ix) Construction and Demolition Waste Management Plan; (x) Contamination Management Plan; and (xi) Bushfire Emergency and Evacuation Plan.	Refer to specific plan	
C2	The Applicant must: (a) not commence construction until the CEMP is approved by the Secretary; and	Section 1.3.5	Construction activities did not commence until the CEMP was approved by the Secretary. Activities will be undertaken in accordance with the most recent, approved version of the CEMP.

CoC	Relevant Requirement	CEMP Section	How Addressed
	(b) carry out the construction of the Project in accordance with the most recent version of the CEMP approved by the Secretary, unless otherwise agreed by the Secretary.		
	The Applicant must ensure that the environmental management plans required under this consent are prepared in accordance with any relevant guidelines, and include:		
	(a) detailed baseline data;		<ul style="list-style-type: none"> <li>Baseline data is included in aspect-specific sub-plans where applicable</li> </ul>
	(b) a description of:		
	(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);		<ul style="list-style-type: none"> <li>Sections 1.8 and Appendix C</li> </ul>
	(ii) any relevant limits or performance measures/criteria; and		<ul style="list-style-type: none"> <li>Applicable management measures are included in aspect-specific sub-plans.</li> </ul>
	(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Project or any management measures;		<ul style="list-style-type: none"> <li>Monitoring and reporting requirements are addressed in Section 4</li> </ul>
C7	(c) a description of the management measures to be implemented to comply with the relevant statutory requirements, limits or performance measures/criteria;	See next column	<ul style="list-style-type: none"> <li>Where appropriate, unexpected finds procedures are included in aspect-specific sub-plans.</li> </ul>
	(d) a program to monitor and report on the:		
	(i) impacts and environmental performance of the Project; and		<ul style="list-style-type: none"> <li>Section 4.5 describes the review process for the CEMP and environmental management of the Development.</li> </ul>
	(ii) effectiveness of any management measures (see (c) above);		<ul style="list-style-type: none"> <li>Section 2.8</li> </ul>
	(e) a contingency plan to manage any unpredicted impacts and their consequences;		<ul style="list-style-type: none"> <li>Appendix R</li> </ul>
	(f) a program to investigate and implement ways to improve the environmental performance of the Project over time;		<ul style="list-style-type: none"> <li>Section 4.4</li> </ul>
	(g) a protocol for managing and reporting any:		<ul style="list-style-type: none"> <li>Section 4.5</li> </ul>
	(i) incidents and non-compliances;		

CoC	Relevant Requirement	CEMP Section	How Addressed
	<p>(ii) complaints;</p> <p>(iii) non-compliances with statutory requirements; and</p> <p>(h) a protocol for periodic review of the plan.</p> <p>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for a particular management plan.</p>		
C8	At least one month prior to the commencement of a new phase of the Project, the CEMP or OEMP and applicable subplans must be reviewed and submitted to the Secretary for approval.	Section 1.3.5	This CEMP and applicable sub-plans will be submitted to the Secretary for approval at least one month prior to the commencement of construction.
C9	<p>Within three months of:</p> <p>(a) the submission of an annual review under condition C10;</p> <p>(b) the submission of an incident or non-compliance notification under condition C13;</p> <p>(c) the submission of an audit under condition C18;</p> <p>(d) the approval of any modification of the conditions of this consent; or</p> <p>(e) the issue of a direction of the Secretary under condition A2;</p> <p>the strategies, plans and programs required under this consent must be reviewed, and if necessary to either improve the environmental performance of the Project, cater for a modification or comply with a direction, must be revised, to the satisfaction of the Secretary. Where revisions are required, the revised document must be submitted to the Secretary for approval within six weeks of the review.</p> <p>Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve the environmental performance of the Project.</p>	Section 4.5	The review and submission process for the CEMP will be undertaken in accordance with this condition, as described in Section 4.5.

CoC	Relevant Requirement	CEMP Section	How Addressed
C10	<p>Each year, the Applicant must submit a review the environmental performance of the Project (including all tenants and occupants) to the to the Department. The review must:</p> <ul style="list-style-type: none"> <li>(a) describe the Project that was carried out in the previous calendar year, and the Project that is proposed to be carried out over the next year;</li> <li>(b) include a comprehensive review of the monitoring results and complaints records from the previous year, including a comparison of these against the: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements, limits or performance measures/criteria;</li> <li>(ii) requirements of any plan or program required under this consent;</li> <li>(iii) the monitoring results of previous years; and</li> </ul> </li> <li>(iv) the relevant predictions in the EIS, Submissions Report, Consolidated assessment clarification responses; Modification Assessment, or conditions of this consent;</li> <li>(c) identify any non-compliance over the previous year, and describe what actions were (or are being) taken to ensure compliance;</li> <li>(d) identify any trends in the monitoring data over the life of the Project;</li> <li>(e) identify any discrepancies between the predicted and actual impacts of the Project, and analyse the potential cause of any significant discrepancies; and</li> <li>(f) describe what measures will be implemented over the next year to improve the environmental performance of the Project.</li> </ul> <p>The Applicant must ensure that copies of the Annual Review are submitted to Council and are available to the CCC and any interested person upon request.</p>	Section 4.5	A review of the environmental performance of the Development will be submitted to the Department, in accordance with this condition.

CoC	Relevant Requirement	CEMP Section	How Addressed
C11	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> immediately after the Applicant becomes aware of an incident. The notification must identify the Project (including the Project application number and the name of the Project if it has one), and set out the location and nature of the incident.	Section 2.9.3	Written notification to the Department will occur immediately, as required.
C12	A written incident notification addressing all requirements for such notification set out in Appendix D of this consent, must also be emailed to the Department at the following address: <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within 7 days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition or, having given such notification, subsequently forms the view that an incident has not occurred.	Section 2.9.3	Written incident notification addressing all requirements for such notification will occur as required.
C13	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Secretary the Applicant must provide the Secretary and any relevant public authorities (as determined by the Secretary) with a detailed report on the incident addressing all requirements for such reporting set out in Appendix D of this consent, and such further reports as may be requested.	Section 2.9.3	A detailed report of an incident addressing the requirements set out in Appendix C of the Development Consent will be provided to the Secretary within 30 days, or as otherwise agreed with the Secretary.
C14	Any written requirements of the Secretary or relevant public authority (as determined by the Secretary) which may be given at any point in time, to address the cause or impact of an incident must be complied with and within any timeframe specified by the Secretary or relevant public authority.	Section 2.9.4	Any written requirements of the Secretary (or relevant public authority) that may be given to address the cause or impact of an incident will be complied with.
C15	If statutory notification is provided to EPA as required under the POEO Act in relation to the Project, such notification must also be provided to the Secretary within 24 hours after the notification was provided to EPA.	Section 2.9.3	Notification will be provided to the Secretary within 24 hours after notification was provided to the EPA.

CoC	Relevant Requirement	CEMP Section	How Addressed
C16	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within 7 days after the Applicant becomes aware of any non-compliance.	Section 4.4	DPHI will be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within 7 days after the Development becomes aware of any non-compliance.
C17	The notification must identify the Project and the application number for it, set out the condition of consent that the Project is non-compliant with, the way in which it does not comply, the reasons for the non-compliance (if known), and what actions have been, or will be, undertaken to address the non-compliance.	Section 4.4	Section 4.4 outlines the requirements for the notification of the non-compliance, in accordance with this condition.
C18	<p>Within one year of the commencement of any Project under this consent, and every three years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the Project. Audits must:</p> <p>(a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) be carried out in consultation with the relevant agencies and the CCC;</p> <p>(c) assess the environmental performance of the Project (and tenancies) and assess whether it is complying with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and</p> <p>(d) review the adequacy of any approved strategy, plan or program required under this consent; and</p> <p>(e) recommend appropriate measures or actions to improve the environmental performance of the Project, and/or any strategy, plan or program required under this consent.</p>	Section 4.3.2	<p>Within one year of the commencement of any Development and annually thereafter, an Independent Environmental Audit will be undertaken by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary.</p> <p>Section 4.3.2 outlines the requirements of this condition.</p>
C19	Within three months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency	Section 4.3.2	A copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, with a response to any recommendations contained in the audit report, and a

CoC	Relevant Requirement	CEMP Section	How Addressed
	that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.		timetable for the implementation of the recommendations. The recommendations will be implemented to the satisfaction of the Secretary.
C20	<p>At least 48 hours before the commencement of construction until the completion of all works under this consent, including demolition and remediation, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) make copies of the following publicly available on its website: <ul style="list-style-type: none"> <li>(i) the documents referred to in condition A2 of this consent;</li> <li>(ii) all current statutory approvals for the Project;</li> <li>(iii) all approved strategies, plans and programs required under the conditions of this consent;</li> <li>(iv) regular reporting on the environmental performance of the Project in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</li> </ul> </li> <li>(v) a comprehensive summary of the monitoring results of the Project, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>(vi) a summary of the current stage and progress of the Project;</li> <li>(vii) contact details to enquire about the Project or make a complaint;</li> <li>(viii) a complaints register updated on a monthly basis;</li> <li>(ix) the Annual Reviews of the Project;</li> <li>(x) audit reports prepared as part of any independent environmental audit of the Project and the Applicant's response to the recommendations in any audit report;</li> <li>(xi) any other matter required by the Secretary; and</li> </ul>	<p>Section 1.3.6 Appendix R</p>	Required documents, including this CEMP will be made available on the MIP website, as required.



CoC	Relevant Requirement	CEMP Section	How Addressed
	(b) keep such information up to date, to the satisfaction of the Secretary.		
C21	<p>The Proponent must prepare and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The Compliance Tracking Program must be submitted to the Secretary for approval prior to the commencement of construction.</p> <p>...</p>	Compliance Tracking Program	A Compliance Tracking Program has been prepared to address the requirements of this condition.
C22	<p>A suitably qualified and experienced ER who is independent of the Project must be nominated by the Applicant, approved by the Secretary and engaged for the duration of construction of the Project in accordance with the <i>Environmental Representative Protocol</i> (DPE 2017). Additional ERs may be engaged for the purpose of this condition in which case the obligations to be carried out by an ER under the terms of this consent may be satisfied by any ER that is approved by the Secretary. The details of nominated ER(s) must be submitted to the Secretary for approval no later than one month prior to the commencement of works, or within another timeframe agreed with the Secretary.</p> <p>This condition does not preclude the same ER for MPW projects being considered by the Secretary.</p>	Section 2.5	<p>The Secretary has approved a suitably qualified and experienced ER for the Development.</p> <p>The role of the ER is described in Section 2.5.4.</p>
C23	Construction must not commence until an ER nominated under C24 has been approved by the Secretary.	Section 2.5	Construction will not commence until an ER is approved by the Secretary.
C24	<p>From commencement of any works until completion of construction, the approved ER must:</p> <p>(a) on behalf of the Applicant, receive and respond to communication from the Secretary in relation to the environmental performance of the Project;</p>	Section 2.5	Section 2.5 of this CEMP outlines the roles and responsibilities of the ER for the Development.

CoC	Relevant Requirement	CEMP Section	How Addressed
	<p>(b) consider and inform the Secretary on matters specified in the terms of this consent;</p> <p>(c) consider and recommend any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community;</p> <p>(d) review the following documents required to be prepared under the terms of this consent, ensure they are consistent with requirements in or under this consent and if so, endorse them prior to submission to the Secretary (if required to be submitted to the Secretary) or prior to implementation (if not required to be submitted to the Secretary):</p> <p>(i) CEMP;</p> <p>(ii) OEMP; and</p> <p>(iii) the other plans and sub-plans required by these conditions, and referenced in conditions C1 and C3;</p> <p>(e) regularly monitor the implementation of all documents required to be prepared under the terms of this consent to ensure implementation is being carried out in accordance with what is stated in the document and the terms of this consent;</p> <p>(f) as may be requested by the Secretary, help plan, attend or undertake Department audits of the Project including scoping audits, programming audits, briefings, and site visits, but not independent audits required under condition C18 of this consent;</p> <p>(g) if conflict arises between the Applicant and the community in relation to the environmental performance of the Project, attempt to resolve the conflict, and if it cannot be resolved, notify the Secretary;</p> <p>(h) consider any minor amendments to be made to the CEMP, CEMP sub-plans and monitoring programs that comprise updating or are of an administrative nature, and are consistent with the terms of this consent and the CEMP, CEMP sub-plans and monitoring programs approved by the Secretary and, if satisfied such amendment is necessary, approve</p>		

CoC	Relevant Requirement	CEMP Section	How Addressed
	<p>the amendment. This does not include any modifications to the terms of this consent; and</p> <p>(i) prepare and submit to the Secretary and other relevant regulatory agencies, for information, a monthly Environmental Representative Report detailing the ER's actions and decisions on matters for which the ER was responsible in the preceding month (or other timeframe agreed with the Secretary). The Environmental Representative Report must be submitted within seven (7) days following the end of each month for the duration of construction of the Project, or as otherwise agreed with the Secretary.</p>		

The Final Compilation of Mitigation Measures (FCMMs) were prepared as part of the consolidated assessment clarification responses issued on 10 November 2017. A list of the FCMMs as relevant to the Development and how they have been complied with in this CEMP are provided in Table 2-6 and the Compliance Tracking Program, prepared in accordance with CoC C21.

Table 2-6 Final Compilation of Management Measures (FCMMs)

No.	Relevant Requirement	How Addressed
0B	<p>The Construction Environmental Management Plan (CEMP), or equivalent, for the Amended Proposal would be based on the PCEMP (Appendix G of the EIS), and include the following preliminary management plans:</p> <p>Preliminary Construction Traffic Management Plan (PCTMP) (Appendix K of the EIS)</p> <p>Air Quality Management Plan (AQMP) (Appendix M of the EIS)</p> <p>Erosion and Sediment Control Plans (ESCPs) and Bulk Earthworks Plans (Appendix P of the EIS).</p> <p>As a minimum, the CEMP would include the following sub-plans:</p> <p>Construction Traffic Management Plan (CTMP)</p> <p>Construction Noise and Vibration Management Plan (CNVMP), prepared in accordance with the Interim Construction Noise Guideline</p> <p>Construction Air Quality Management Plan</p>	<p>All nominated plans have been / will be prepared as sub-plans to the CEMP or as stand-alone documents.</p> <p>The Community Communication Strategy is being prepared in place of the Community Information and Awareness Strategy and is attached to the CEMP as Appendix R.</p>

No.	Relevant Requirement	How Addressed
	<p>Flora and Fauna Management Plan</p> <p>A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan</p> <p>Contamination Management Plan</p> <p>Flood Emergency Response and Evacuation Plan</p> <p>UXO, EO, and Exploded Ordnance Waste Management Plan</p> <p>Asbestos Management Plan</p> <p>Heritage (Indigenous and Non-Indigenous) Management Plan/s</p> <p>Bushfire Management Strategy</p> <p>Community Information and Awareness Strategy.</p>	
0D	<p>The construction and/or operation of the Amended Proposal may be delivered in a number of stages. If construction and/or operation is to be delivered in stages a Staging Report would be provided to the Secretary prior to commencement of the initial stage of construction and updated prior to the commencement of each stage as that stage is identified.</p>	<p>The construction of the Development is not proposed to be delivered in multiple stages.</p>
6E	<p>An Emergency Response Plan would be prepared and implemented. The plan would meet the requirements of Clause 153C of the POEO Act and the POEO (General) Regulation (Cl. 98B) and specify the procedure to be followed in the event of a spill, including the notification requirements and use of absorbent material to contain the spill. A spill kit would be provided on the Amended operational area at all times.</p>	<p>Section 2.9</p>
6G	<p>The CEMP would include an Earthworks Specification, which would include details on earthworks material criteria, handling and placement requirements, embankment and cutting formation (including foundation, batter and benching requirements), unsuitable material and bridging layer requirements, conformance testing methods and acceptance criteria (e.g. for material acceptance and compaction control).</p>	<p>Refer to Construction Soil and Water Management Plan (Appendix G)</p>
7B	<p>The following measures would be included in the CEMP (or equivalent) to minimise hazards and risks:</p> <p>Construction works, including the storage, handling and use of hazardous construction materials would be undertaken in accordance with the provisions of the Work Health and Safety Act 2011 and Work Health and Safety Regulation 2011.</p>	<p>Section 1.4.3</p> <p>Refer to Bushfire Emergency and Evacuation Plan (Appendix O), Asbestos Management Plan contained</p>

No.	Relevant Requirement	How Addressed
	<p>All demolition activities would be undertaken in accordance with Australian Standard AS2601-1991 – Demolition of Structures</p> <p>Safe operational access and egress for emergency service personnel and workers will be provided at all times and specified in the CEMP.</p> <p>Regular maintenance and inspection of all environmental and safety protection controls would be undertaken.</p>	<p>within the Contamination Management Plan (Appendix N)</p> <p>Health and safety requirements for the Development will be addressed within the Health and Safety Plan, to be prepared by the Contractor's CM in accordance with the Principal Representative's Development Requirements</p>
7D	<p>All asbestos removal works, including the demolition of the eight structures identified as containing asbestos (refer to Figure 14-1 of the EIS will be undertaken in accordance with the Environmental Management Plan (GHD, 2016) and the following:</p> <p>The Code of Practice for the Safe Removal of Asbestos (NOHSC, 2005)</p> <p>Code of Practice: How to Safely Remove Asbestos (WorkCover NSW, 2017)</p> <p>Asbestos removal would be carried out by an appropriately licensed asbestos removalist. The licensing requirements for asbestos removal are specified in the <i>Code of Practice How to Safely Remove Asbestos</i> (WorkCover NSW, 2011). .</p>	<p>Refer to Asbestos Management Plan contained within the Contamination Management Plan (Appendix N)</p>
9B	<p>Management of Aboriginal heritage would be included in the CEMP for the Amended Proposal. Information within the CEMP would include:</p> <p>A summary of the findings of the Aboriginal Heritage Impact Assessment</p> <p>Report (provided at Appendix S of the EIS)</p> <p>Guidance on unexpected archaeological and cultural finds (including human remains).</p>	<p>Refer to the Construction Heritage Management Plan (Appendix K)</p>
11F	<p>Waste would be diverted from landfill, including diversion of spoil, construction and demolition waste, and commercial and industrial waste, where reasonable and feasible. The management of waste would be considered as part of the preparation of the CEMP for the Amended Proposal, detailing the appropriate procedures for waste management.</p>	<p>Refer to the Construction Demolition and Waste Management Plan (Appendix M) and the Construction Spoil Management Plan</p>

No.	Relevant Requirement	How Addressed
12A	<p>Measures to mitigate the effect of the construction waste streams would be incorporated into the Amended Proposal's CEMP, including the following information:</p> <p>Avoidance and reuse of material will have priority over recycling</p> <p>Recycling will have priority over disposal</p> <p>Earth excavated from the site will be used for fill material and landscaping where feasible</p> <p>If possible concrete components will be crushed and reused onsite, with the remainder sent to a recycling facility</p> <p>Waste generation will be minimised by ordering the correct quantity of materials</p> <p>Selection of materials which maximise recycled content, while having low embodied water and energy use</p> <p>Selection of materials which maximise durability and lifespan.</p> <p>The following procedures and protocols will be considered within the CEMP regarding waste management:</p> <p>Characterisation of construction waste streams</p> <p>Management of any identified hazardous waste streams</p> <p>Procedures to manage construction waste streams, including handling, storage, classification, quantification, identification and tracking</p> <p>Mitigation measures for avoidance and minimisation of waste materials</p> <p>Procedures and targets for reuse and recycling of waste materials.</p> <p>Inclusion of the waste management strategies included in the Concept Plan Statement of Commitments for construction waste management.</p>	<p>Refer to the Construction Demolition and Waste Management Plan (Appendix M)</p>
15A	<p>A community information and awareness strategy would be included in the CEMP and would outline measures to maintain communication with the community and all relevant stakeholders throughout the construction process of the Amended Proposal.</p>	<p>The Community Communication Strategy provides mechanisms to facilitate communication with the community and relevant stakeholders and is attached in Appendix R.</p>

### **2.6.2. Permits and Licences**

Permits and licences relevant to this Development are detailed in the Development Permits and Licences Register Appendix B. This register will be revised and updated in conjunction with the management review outlined in Section 4.5 or when there has been a change to relevant legislation.

Compliance conditions relating to items listed on the Permits and Licences Register are incorporated into this CEMP. Specific details and controls are included within the associated sub-plans.

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

#### **2.6.2.1. Environment Protection Licence**

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

An EPL (No. 21054) was issued by the EPA for the Moorebank Precinct on 4 June 2018. A variation to the license was issued on 18 April 2019 to capture cut and fill earthworks occurring on the Development Site and additional considerations observed during a site inspection on the 23 November 2018.

The licence applies to the Moorebank Precinct (excluding the MPE Stage 1 Rail Access Land Package (RALP) which has a separate EPL licence (No. 20966) and authorises > 100,000 – 500,000 tonnes crushing, grinding or separating processing capacity per annum and > 500,000 – 2,000,000 tonnes extraction, processing or storage capacity per annum. The licence applies to all other activities carried on at the premises, including road construction, bulk earthworks ‘cut and fill’ and importing fill.

#### **2.6.2.2. Utilities Agreements and Approvals**

Utility connections for the Development will be to the existing utilities on the MPE Stage 1 site, which will be undertaken via applications made directly to the relevant utility providers and approved through their authority and delegation under Part 5 of the EP&A Act. No direct connections from the Development to any authority mains will be required and approvals from the utility service providers must be obtained (CoC A27).

Should it be identified that public utility adjustment/relocation works will be required by the Development, in particular for the Moorebank Avenue upgrade works, the Construction Contractor will be responsible for identifying the works required and gaining approval from the relevant utility service providers prior to undertaking the works. All relocation / adjustment works identified as required will be undertaken by the Development (CoC B19).

A Section 73 Compliance Certificate will be obtained from Sydney Water Corporation for water and sewerage infrastructure servicing the Development prior to commencement of operations (CoC A28).

### **2.6.3. Other Requirements**

#### **2.6.3.1. ISCA Requirements**

Infrastructure Sustainability Council of Australia (ISCA) requirements will be carried out for the Development and are referenced from the ISCA Version 1.2 documentation. The ISCA requirements which are relevant to the Development are detailed in Table 2-7.



Table 2-7 ISCA Requirements

ISCA Credit	Requirement	Phase	Reference Document	CEMP Section
Cli-1: Climate change risk assessment	Carry out a climate change risk assessment covering direct and indirect risks to the asset.	Design	Climate Change Risk Assessment Report	N/A
Cli-2: Adaptation measures	Provide a climate change study report showing identification of risks and implementation of adaptation measures.	Design	Climate Change Risk Assessment Report	N/A
Eco-1: Ecological value	The ecological value of the infrastructure site is maintained through ecological assessment.	Construction	CFFMP	N/A
	The ecological value of the infrastructure site is enhanced.	Construction	CFFMP	Section 2.3.32.3.2
Eco-2: Habitat connectivity	The existing degree of habitat connectivity is maintained (based on previous ecological assessments). This can include offset strategies.	Construction	CFFMP	Section 1.8; Table 1-5 Section 2.8.1.1; Table 2-8 Section 4.2.2; Table 3-1
	Ecological assessments and management plans must be reviewed by a suitably qualified professional.	Construction	CFFMP	Section 1.8; Table 1-5 Section 4.5
Ene-1 Energy and carbon monitoring and reduction	Model and monitor the energy and carbon footprint of the site.	Construction	SODCT	Section 1.8; Table 1-5 Section 4.1



ISCA Credit	Requirement	Phase	Reference Document	CEMP Section
Ene-2: Use of Renewable energy	Report actual energy and carbon footprints compared to base case scenarios.	Construction	SODCT	Section 1.8; Table 1-5 Section 4.6.1
	Opportunities for renewable energy use are comprehensively investigated.	Design	MIP Sustainability Management Plan	N/A
	Report and monitor substitution of energy from renewable sources.	Construction	SODCT	Section 1.8; Table 1-5 Section 4.6.1
Inn-1: Innovation strategies and technologies	Investigate and implement innovations.	Design	MIP Sustainability Management Plan	N/A
Lan-1: Previous land use	Report on area of land used by the Project.	Design	MIP Sustainability Management Plan	N/A
Man-6: Knowledge sharing	Sustainability knowledge is shared within the project, to stakeholders, beyond the project boundaries to the wider industry.	Construction	CEMP	Section 1.8; Table 1-5 Section 2.8.1
Mat-1: Materials lifecycle impact measurement and reduction	Monitor and model materials lifecycle impacts across the infrastructure lifecycle.	Construction	SODCT	Section 1.8 Table 1-5 Section 2.5.2
	Reduce materials lifecycle impacts compared to the base case scenario.	Construction	MIP Sustainability Management Plan	Section 1.8; Table 1-5



ISCA Credit	Requirement	Phase	Reference Document	CEMP Section
SODCT				
Sta-1: Stakeholder engagement strategy	Develop a comprehensive stakeholder engagement strategy.	Design	LOGOS CES	N/A
	A suitably qualified professional must manage, review and audit strategy.	Construction	CCS	Section 1.8; Table 1-5 Section 4.1
	Facilitate community involvement in the Project of the strategy.	Design	LOGOS CES	N/A
Sta-3: Effective communication	The community has been provided with information that: <ul style="list-style-type: none"><li>– was provided in a timely manner</li><li>– supported community participation</li><li>– was meaningful and relevant</li><li>– was accessible</li></ul>	Construction	CCS	Section 1.3.4 Section 1.3.6 Section 2.7.2 Section 4.5
	Public information is verified by independent reviews and audits.	Construction	CCS	Section 1.3.5 Section 1.8; Table 1-5 Section 4.3
Sta-4: Addressing community concerns	Ensure that community concerns are adequately addressed and verified by internal management, reviews and audits.	Construction	CCS	Section 1.3.4 Section 1.8; Table 1-5 Section 2.7.3 Section 4.5

### 2.6.3.2. Guidelines and Standards

This CEMP has been prepared in accordance with the Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004) as demonstrated in Table 2-8.

Table 2-8 Guideline for the Preparation of Environmental Management Plans requirements

EMP Guideline Section		CEMP Reference
Background	Introduction	Section 1.1
	Location	Section 1.1
	Construction activities	Section 1.1
	Timing and schedule	Section 1.6 and Section 1.5
	Project description	Section 1.1
	EMP context	Section 1.3.1, also Section 2.1 and Section 2.2
	EMP objectives	Section 1.3.3
	Environmental policy	Section 2.2
	Environmental management structure and responsibility	Section 2.5
	Approval and licencing requirements	Section 2.6.1, Section 2.6.2 and Appendix B
Environmental management	Reporting	Section 4.6
	Environmental training	Section 2.8
	Emergency contacts and responses	Table 2-10 and Section 2.9
	Risk assessment	Section 3.1 and Appendix C
	Environmental management activities and controls	Issue-specific sub-plans
Implementation	Environmental control plans or maps	Section 2.3.2 and Appendix D
	Environmental schedules	Environmental schedules (e.g. site inspection checklists, waste register, imported spoil tracking register) will be retained on the Development's document management system and/or included in issue-specific sub-plans where appropriate
	Environmental monitoring	Section 4.1 and aspect-specific sub-plans

Monitor and review	Environmental auditing	Section 4.3
	Corrective actions	Section 4.4.3
	EMP review	Section 4.5

Compliance with relevant legislation and industry best practice is often achieved through the adherence to relevant guidelines and standards. Guidelines and Standards used during the compilation of this CEMP and sub-plans include (but are not limited to):

- AS 1940-2004 The Storage and Handling of Flammable and Combustible Liquids
- AS 2890.1:2004 Parking facilities off-street Parking
- AS 2890.2:2002 Parking facilities - Off-street commercial vehicle facilities
- AS 2890.6:2009 Off-street parking for people with disabilities
- AS/ISO 10002:2006 Customer Satisfaction – Guidelines for Complaints handling in Organisations
- AS/NZS ISO 14001:2015 – Environmental Management Systems
- AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems
- AS/NZS ISO 31000:2009 - Risk Management
- AS1158 Street Lighting Applications
- AS1158.3:1999 Pedestrian Area (Category P) Lighting
- AS2601;2001 The Demolition of Structures
- AS3580.10.1 2003 Methods for sampling and analysis of ambient air – Determination of particulates – Deposited matter – Gravimetric Method
- AS3580.9.3-2015 Methods for sampling and analysis of ambient air Method 9.3: Determination of suspended particulate matter—Total suspended particulate matter (TSP)—High volume sampler gravimetric method
- AS4282:1997 Control of the Obtrusive Effects of Outdoor Lighting
- AS4970:2009 Protection of Trees on Project Sites
- Assessing Vibration: A Technical Guide (DECC 2006)
- Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2000)
- Australian Dangerous Goods Code Edition 7.4
- Australian Rainfall and Runoff – Volume 1 (2001), Engineers Australia
- DECC June 2007 – Local Government Air Quality Toolkit, Visual Guide: Dust from urban construction sites (DECC 2007)

- DIN 4150-3: Structural Vibration – Effects of Vibration on Structures (for structural damage)
- Environmental Guidelines: Solid Waste Landfills, NSW EPA 1996
- Environmental Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (EPA 1997)
- EPA's Smoky Vehicles Program under the NSW Protection of the Environment and Operations Act 1997 and NSW Protection of the Environment and Operations Regulations 2010.
- Guide to Road Design (Austroads)
- Guideline for the Preparation of Environmental Management Plans (DIPNR 2004)
- Guidelines for Controlled Activities (NSW Office of Water)
- Interim Construction Noise Guideline (DECC 2009)
- Managing Urban Stormwater – Soils and Construction Volume 1, 4th Edition (Landcom 2004)
- National Environment Protection Council 2016 – Ambient Air: National Environment Protection Measure for Ambient Air Quality
- National Environment Protection Measure (NEPM) (Diesel Vehicle Emissions)
- NEPM Guidelines for the Assessment of Site Contamination
- NSW Biodiversity Offsets Policy for Major Projects (OEH 2014)
- NSW Department of Primary Industries (DPI) Policy and Guidelines for Fish Habitat Conservation and Habitat Management (2013)
- NSW EPA 2006 – Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales (2006)
- NSW EPA Best Practice Note: Land farming (2014)
- NSW EPA Contaminated Sites, Sampling Design Guidelines (1995)
- Principal's Project Requirements IMEX Terminal No. 1 (IMEX No. 1)
- State Environmental Planning Policy No. 55 – Remediation of Land
- Storing and Handling Liquids: Environmental Protection – Participants Handbook (EPA)
- The Code of Practice for the Safe Removal of Asbestos (NOHSC, 2005)
- WorkCover NSW, Code of Practice: How to Safely Remove Asbestos (WorkCover NSW, 2017)
- Waste Classification Guidelines Part 1: Classifying waste (NSW EPA 2014).

## 2.7. Communication

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

A Community Communication Strategy (CCS) has been developed to provide mechanisms to facilitate communication between MIP and the key stakeholders, including regulators, Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the Development), during the design and construction of the Development. TSA Management is the Community Engagement Consultant (CEC) for MIP and will act as the 'control tower' for all public communications. All community liaison must be undertaken in accordance with the CCS.

The Construction Contractor will communicate with internal and external stakeholders and other interested parties will be kept informed of the Development's progress and any changes and issues as necessary as described in this section.

#### **2.7.1. Internal Communications**

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

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

- Management reports
- Site inspection reports
- Noticeboards
- Site meetings
- Employee induction, training and toolbox sessions
- Briefings, notifications and alerts
- Development reports.

##### **2.7.1.1. Incidents**

Information relating to incidents will be communicated / reported in accordance with the reporting hierarchy as shown in Section 2.8 and CoC C11 to C17.

#### **2.7.2. External Communications**

External communication methods that will be undertaken by the CEC and/or the Construction Contractor include:

- Site meetings
- ER meetings
- ER Compliance Reports
- Site Environmental Compliance reports
- Visitors induction and training
- Stakeholder meetings
- Community notifications for landowners and businesses who are directly impacted by the Development (e.g. community updates, Development information flyers and/or other communications material)

- Notifications and Development updates to Principal's Representative.

Media inquiries are the responsibility of the Principal's Representative. Direct requests from the media to any personnel for information about the Development will be referred directly to the Principal Representative.

Information relating to external notification for incidents is further detailed in Section 2.6.2 of this CEMP and the CCS.

### **2.7.3. Complaints**

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

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

Environmental management-related complaints will be forwarded onto the Contractor's EM by the Development Manager (Communication) (DM Communication) and / or the Principal's Representative, in accordance with the CCS.

#### **2.7.3.1. Damage to Third Party Property or Infrastructure**

Reports (including through complaints) of damage to third party property or infrastructure as a result of construction work will be treated as an incident that follows the process outlined in Section 2.8. Potential damage will be notified, classified, reported and investigated as per the incident management process. The CTAMP contains protocols for the identification and rectification of damage to roads and road infrastructure.

The initial response timeframes will follow the complaints process, as outlined within the CCS, however investigations and potential rectifications will be undertaken as per the incident management process (Section 2.8). Dispute resolution is outlined within the CCS.

## **2.8. Training and Competence**

### **2.8.1. Training**

All Development personnel shall undergo general environmental awareness training and training relevant to their responsibilities under the CEMP. Records of Development environmental induction and other environmental training will be maintained in the Construction Contractor's site office.

#### **2.8.1.1. Development Environmental Induction**

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



All employees (including sub-contractors) will receive induction/ training in the following:

- Environmental Policy
- Sustainability Policy
- Requirements of the CEMP and sub-plans
- Individual authorities and responsibilities
- Site environmental rules
- Heritage considerations
- Potential consequences of departure from rules
- Emergency procedure and response (e.g. spill clean-up)
- Legal obligations
- Location of environmentally sensitive areas and exclusion zones
- Waste management
- Conservation of on-site resources including water, materials, and energy
- Water consumption
- Sustainability requirements of the Development
- Communications and reporting incidents
- Environmental competency requirements for works
- Site personnel will be informed of their individual responsibility to be proactive and report any instances of environmental control measures not operating properly.

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

#### **2.8.1.2. Task-specific Training**

All construction personnel and sub-contractors undertaking a task governed by an EWMS will participate in training on the EWMS and acknowledge that they have read and understood their obligations prior to commencing work.

The Contractor's EM or Site Supervisor is responsible for training staff in the EWMS and maintaining a register / sign off sheets of EWMS training.

#### **2.8.1.3. Pre-start and Toolbox Talks**

Pre-starts will be held daily by the Site Supervisor and will provide Development personnel and sub-contractors with any updates on environmental matters, including any key or recurring environmental issues. The Pre-starts will be based on requirements in relevant EWMS and Environmental Control Map (ECM). Attendance of all work team members at the meetings is required.

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

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

- Community awareness
- Soil and water management practices
- Working with potentially contaminated soils
- Noise minimisation for staff working out of hours
- Incident management, and environmental emergency mock training
- Heritage awareness
- Sustainability requirements
- Waste management
- Any other subjects listed in environmental management plans.

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

The Contractor's EM is responsible for maintaining a register of environmental training carried out, including dates, names of people trained and details of the training and trainer. This may take the form of a sign-off sheet for pre-starts and toolbox talks.

#### 2.8.1.4. Recommended Environmental Training

A summary of proposed awareness training by environmental aspect is provided in Table 2-9. The training is to be scheduled to reflect works / activities in the construction program.

Table 2-9 Awareness Training by Environmental Aspect

Aspect	Training Inclusion	Personnel Required	Timing / Frequency / Means
Emergency spill response	<ul style="list-style-type: none"> <li>• Use and location of spill kits</li> <li>• Spill control</li> <li>• Emergency response procedures</li> <li>• Presentation and assessment</li> <li>• Spill response drill</li> <li>• Identification of hydraulic hose fatigue.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>• Development induction</li> <li>• Development toolbox talks</li> <li>• Contractor to provide relevant training</li> </ul>
Erosion and sediment control	<ul style="list-style-type: none"> <li>• Standard erosion and sediment controls from the Landcom 'Blue Book'</li> <li>• Implementation of erosion and sediment controls on site</li> <li>• Erosion and Sediment Control Plans.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>• Development induction</li> <li>• Development toolbox talks</li> <li>• Contractor to provide relevant training</li> </ul>



Heritage awareness	<ul style="list-style-type: none"> <li>Stop works and reporting protocols for discovery of previously unknown heritage and archaeological items.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>Development induction</li> <li>Development toolbox talks</li> <li>Protocol posted on message boards</li> </ul>
Contamination awareness	<ul style="list-style-type: none"> <li>Contamination status of site</li> <li>Stop works protocols for unidentified potential contamination (e.g. hydrocarbons and asbestos)</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>Development induction</li> <li>Development toolbox talks</li> <li>Protocol distributed to workers and posted on message boards</li> </ul>
Environmental legal obligations	<ul style="list-style-type: none"> <li>POEO Act and other Development requirements</li> <li>Applicable fines and prosecutions.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>Development induction</li> <li>Development toolbox talks</li> </ul>
Energy and resource usage	<ul style="list-style-type: none"> <li>Awareness training of energy and resource efficiency in the workplace including office / compound and site initiatives such as harvesting rainwater for dust suppression instead of potable mains water and use of bio-fuels, eco-driving.</li> <li>Data collation.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>Development induction</li> <li>Development toolbox talks</li> </ul>
Waste management	<ul style="list-style-type: none"> <li>Waste management and recycling</li> <li>Water reduction</li> <li>Spoil and topsoil management</li> <li>Data collation.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>Development induction</li> <li>Development toolbox talks</li> </ul>
Community / stakeholder awareness	<ul style="list-style-type: none"> <li>Adjacent community and Development involvement</li> <li>Relevant Development stakeholders</li> <li>Accepted behaviours</li> <li>Approved hours of work.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>Development induction</li> <li>Development toolbox talks</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>'No go' areas and exclusion areas</li> <li>Environmental Control Maps</li> <li>Wildlife status of Development and surrounds</li> <li>Stop work and reporting protocols for injured wildlife</li> <li>Measures to stop feral animals coming to site.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>Development induction</li> <li>Development toolbox talks</li> </ul>

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Noise and vibration	<ul style="list-style-type: none"> <li>• Work hours</li> <li>• Management measures to reduce noise and vibration from Early Works activities</li> <li>• EPL requirements</li> <li>• POEO Act and other Development requirements.</li> </ul>	Construction personnel	<ul style="list-style-type: none"> <li>• Development induction</li> <li>• Development toolbox talks</li> </ul>
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### 2.8.2. Worker Competency

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

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

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

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

The Site Supervisor and Contractor's EM is responsible for monitoring the skills required by workers to effectively implement the CEMP, sub plans and associated procedures on site. The Contractor's EM / Site Supervisor will communicate additional training needs identified to the Contractor's WM.

## 2.9. Emergency Preparedness and Response

An environmental incident is an incident or set of circumstances resulting in harm, or potential harm, to the environment. Environmental incidents include pollution incidents and environmental emergencies. Environmental incidents may arise from natural (e.g. storm, wind or bushfire) or human factors.

A pollution incident is an incident or set of circumstances during or as a consequence of, which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises. It does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).

An environmental emergency is any event that causes or has the potential to cause material harm to the environment. An environmental emergency is a Class 3 incident.

The Construction Contractor must develop an Emergency Preparedness and Response Management Plan (EPRMP) and be in accordance with the Pollution Incident Response Management Plan (PIRMP), required under the EPL for the Development.

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

Table 2-10 Emergency Contact Details

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



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DM Communication



Back-up 24-hour contact

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Contractor Health & Safety Manager



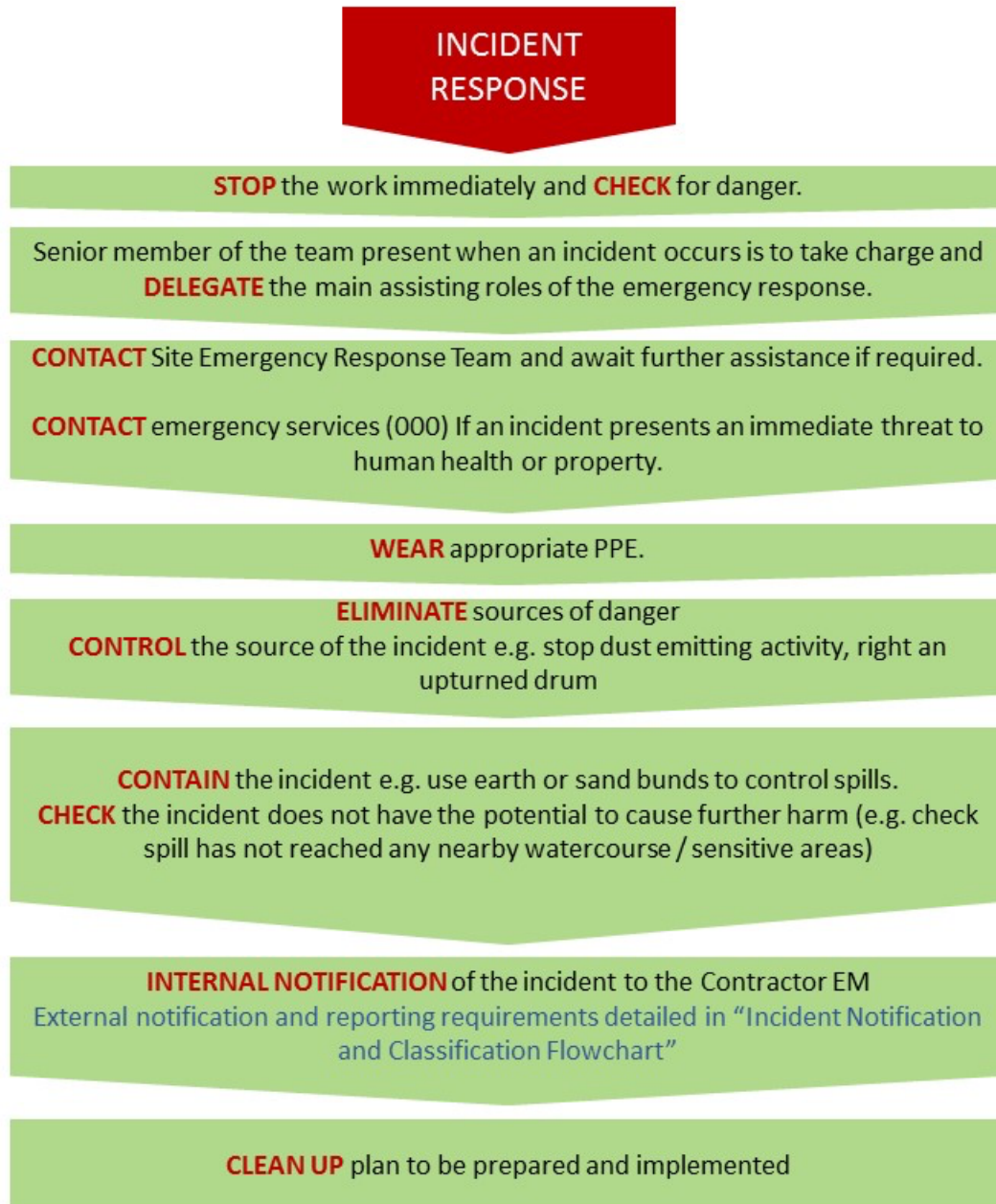
Back-up 24-hour contact

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### 2.9.1. Incident Response

All environmental incidents are to be managed in accordance with the flowchart shown in Figure 2-5.

Figure 2-5 Environmental Incident Response Flowchart



### 2.9.2. Incident Classification and Notification

All environmental incidents are to be reported and managed in accordance in accordance with the PIRMP, once implemented. Environmental incidents will be classified and notified in accordance with Figure 2-6.

Incident notification requirements, in accordance with Appendix C of the CoCs must:

- Identify the Development and application number
- Provide details of the incident (time, date, nature, duration and location of the incident)

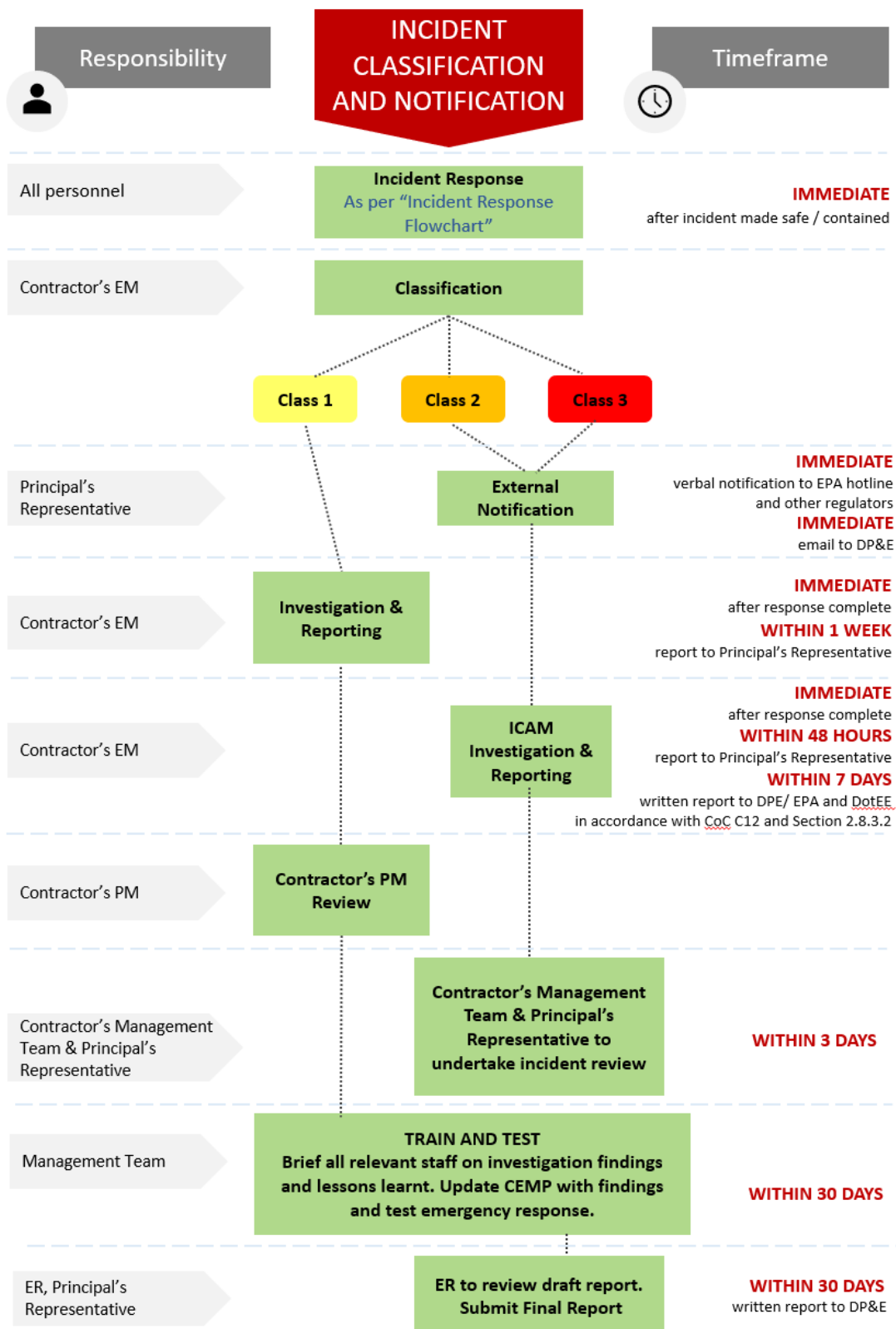
- State the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known
- Outline the circumstances in which the incident occurred (including the cause of the incident, if known)
- Identify how the incident was detected
- Identify when the Applicant became aware of the incident
- Identify any actual or potential non-compliance with conditions of consent or with an approved construction management plan
- Describe what immediate steps were taken in relation to the incident
- Identify further action(s) to be taken in relation to the incident
- Identify a contact for further communication regarding the incident and set out their contact details.

The incident report requirements, in accordance with Appendix C of the CoCs must include:

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



Figure 2-6 Environmental Incident Classification and Notification



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

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

Table 2-11 Environmental Incident Classification

	Class One	Class Two (including potential)	Class Three
Direct costs including clean up or implementing corrective action/s	Up to \$10,000	\$10,000 to \$100,000	More than \$100,000
Impact	<ul style="list-style-type: none"> <li>• Pollution or degradation which has low severity impacts on the community and/or environment in the short-term (&lt;1 month duration) and is fully reversible with no residual impacts</li> <li>• Harming a protected animal that is not vulnerable or threatened</li> <li>• Non-compliance with an approved management plan where non-compliance is administrative</li> </ul>	<ul style="list-style-type: none"> <li>• Pollution or degradation which has moderate severity impacts on the community and/or environment (1-3 months duration) but is fully reversible with no residual impacts</li> <li>• Harming an animal that is (or is part of) a vulnerable species or vulnerable ecological community</li> <li>• Picking a plant that is (or is part of) a vulnerable species or vulnerable ecological community.</li> <li>• Non-compliance with an approved management plan where non-compliance results in persistent failure to attain/maintain objectives and targets identified in Table 5.</li> </ul>	<ul style="list-style-type: none"> <li>• Pollution or degradation which has high severity impacts on the community and/or environment and may have irreversible residual impacts</li> <li>• Harming an animal that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community) (S2.1)</li> <li>• Picking a plant that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community)</li> <li>• Damaging a declared area of outstanding biodiversity value</li> <li>• Knowingly damages any habitat of a threatened species or threatened ecological community</li> <li>• Contravention of a stop work order.</li> </ul>

### 2.9.3. External Notification

All external notification of environmental incidents are to be undertaken by the Principal's Representative.

The CCS provides mechanisms to facilitate communication between LOGOS, the Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the Development), during construction.

#### 2.9.3.1. State Matters

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

The notification to the EPA 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.

In addition to notifying the EPA of pollution incidents, the Principal's Representative is to immediately notify other regulatory authorities as outlined below:

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

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

If statutory notification is provided to EPA as required under the POEO Act, such notification must also be provided to the Secretary within 24 hours after the notification was provided to EPA (CoC C15). Full written details of the incident shall be provided to the Secretary within 7 days of the date on which the incident occurred. The ER is to also be immediately notified.

DPHI is to be notified in writing ([compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)) immediately upon becoming aware of an incident that causes or threatens to cause material harm (as defined by the Development Consent), in accordance with CoC C11. Additional written notification of the incident (refer to Annexure C of the Development Consent for requirements) shall be provided to the Secretary within 7 days of the date on which the

incident occurred (CoC C12). A detailed report of the incident addressing the requirements set out in Appendix C of the Development Consent will be provided to the Secretary within 30 days, or as otherwise agreed with the Secretary (CoC C13).

Records of contact with and details of the information provided to external authorities must be maintained in the Development records. Any contact with the regulatory authorities will be logged using Aconex.

#### **2.9.3.2. Commonwealth Matters**

Environmental incidents relating to the EPBC Act must be notified to the Secretary of the DCCEE within seven days of the event ([epbcmonitoring@environment.gov.au](mailto:epbcmonitoring@environment.gov.au)).

These types of incidents include reporting of Class 2 and Class 3 non-compliance (Table 16), and/or the death or injury to the following:

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

#### **2.9.4. Incident Review**

Actual and potential Class 1 incidents are to be reviewed by the Contractor's EM.

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

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

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

- The condition of the environment and the status of any rectification or remediation works
- The completed incident investigation report, including appropriate causal analysis and corrective actions
- Program for the implementation of the corrective actions and any maintenance activities
- Incorporation of any requirements of regulatory agencies as a result of external notification
- Any other relevant information.

Any written requirements of the Secretary (or relevant public authority) that may be given to address the cause or impact of an incident will be complied with in accordance with CoC C14.

The Contractor's EM is to provide the Principal's Representative evidence to show the recommendations from the incident investigation have been undertaken. The ER is to be provided with the incident investigation report.

### **3. Implementation**

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

#### **3.1. Aspects, Impacts and Risk Management**

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

- Construction traffic impacts on local roads surrounding construction worksites
- Noise and vibration impacts on surrounding residents and businesses
- Diminishing air quality through construction vehicle emissions and dust generation
- Loss of biodiversity
- Pollution of adjacent waterways from water discharge and/or spills from worksites
- Discovery of previously unidentified Aboriginal or non-Aboriginal heritage
- Discovery of previously unidentified contaminated soils
- Visual impacts of temporary construction worksites on surrounding residences and businesses.

##### **3.1.1. Aspects and Impact Assessment**

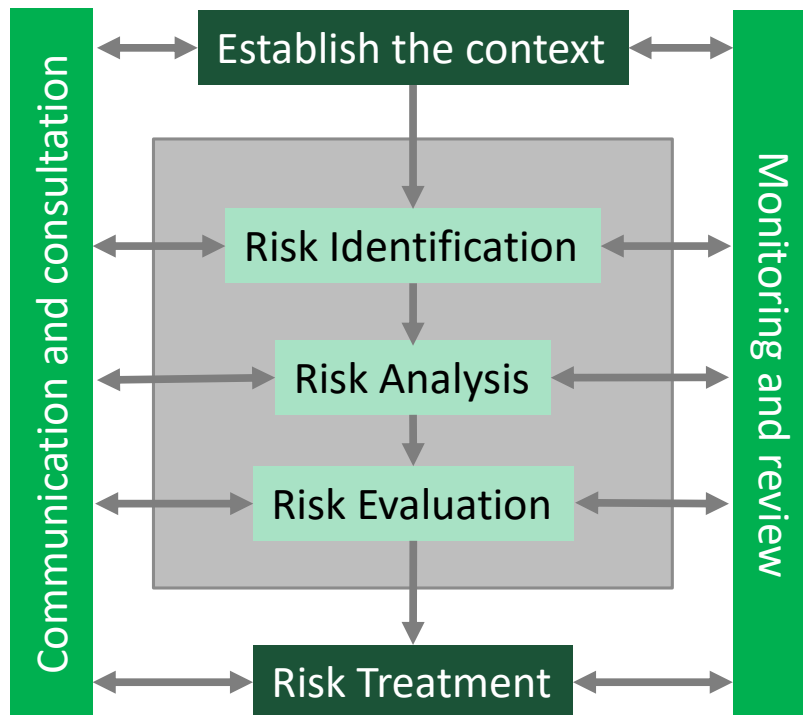
A risk workshop was undertaken with the Development Management Team and a team of environmental specialists. The workshop identified the aspects and impacts, their relevant risk ranking, control measures to reduce environmental harm, opportunities contributing to positive outcomes for the environment, community and the economy and a residual risk ranking.

The resulting Aspects and Impacts Register (Appendix C) has been reviewed, and where appropriate updated, by the Environmental Representative, the Development Management Team and environmental specialists.

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

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

Figure 3-1 Risk Assessment Process



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

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

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

### 3.1.2. Cumulative Impacts

A qualitative assessment of the potential cumulative impacts of the Development was undertaken during the preparation of the EIS for MPE Stage 2 (refer to Section 19 of the EIS). This assessment covered all the relevant aspects of construction and cumulative environmental impacts are documented within each of the sub-plans to this CEMP.

With the implementation of the management measures outlined in each of the individual aspect management plans, the potential cumulative impacts are considered to be manageable.

## 3.2. Environmental Management Activities and Controls

Environmental management measures are documented in the sub-plans to this CEMP.

Environmental hold points provide a key control and are discussed below.

Other measures to manage environmental impacts include ECMs (Appendix D) and the Aspects and Impacts Register (Appendix C).

### 3.2.1. Environmental Hold Points

The activities outlined in Table 3-1 below have been identified as 'moderate' or 'high' risk activities. They are not to proceed without objective review and approval by the nominated approval authority. The activities below are considered provisional hold points that must be identified within either the EWMS or an Inspection Test Plan, or other procedural documentation.

Table 3-1 Construction Environmental Hold Points

Item	Activity Held	Release Criteria	Approval Authority	Plan Reference
Traffic	Truck movements	Approved road occupancy licence	Contractor's EM	Appendix E – CTAMP
Dewatering	Dewatering/pumping water off the site	Verification that water quality criteria set-out in the CSWMP have been met	Contractor's EM	Appendix G – CSWMP
Sediment and erosion control measures	Prior to ground disturbing activities in the new works area	An Erosion and Sediment Control Plan has been developed, reviewed, and approved	Principal's Representative	Appendix G – CSWMP
Site clearing/vegetation removal	Commencement of site clearing or vegetation removal in new works area	Pre-clearing requirements as outlined in the CFFMP have been undertaken and verified	Principal's Representative	Appendix L – CFFMP
Unexpected finds including threatened species, heritage item and contamination	Resumption of works in the affected area	Refer to aspect specific sub-plan	Principal's Representative	Appendix K – CHMP Appendix L – CFFMP Appendix N – CMP
Dangerous Goods	Transport of Dangerous Goods	Verification that transport vehicles meet the requirements	Contractor's CM	Appendix E – CTAMP
Dangerous Goods	Storage of Dangerous Goods	Verification that bunded storage is provided and that offset distances are maintained for the storage area	Contractor's CM Site Supervisor	Appendix G – CSWMP
Controlled / hazardous waste	Transport of controlled / hazardous waste from the site	Verification that the waste has been classified in accordance with the guidelines, transport licensing in place and landfill can	Contractor's EM	Appendix M – CDWMP



Item	Activity Held	Release Criteria	Approval Authority	Plan Reference
		lawfully receive the waste		
Spoil transport	Removal of spoil from site	<p>Verification that the spoil has been classified and the disposal location can lawfully receive the waste.</p> <p>Obtain Approved Form Under Section 143 of the POEO Act from location owner if not a NSW EPA licensed facility)</p>	Contractor's EM	Appendix M – CDWMP
Spoil transport	Import of spoil to site for fill	<p>Waste classification of imported spoil as either ENM, VENM, or other material approved by the EPA prior to spoil entering the site.</p> <p>Visual check and confirmation</p> <p>Supply Approved Form Under Section 143 of the POEO Act from LOGOS to spoil owner and transporter</p>	Contractor's EM	<p>Appendix M – CDWMP</p> <p>Spoil Management Plan (SMP)</p>
Heritage	No works to be undertaken impacting on PADs V and W. Archaeological monitoring to be undertaken in accordance with an Archaeological Monitoring Program.	Archaeological Monitoring Program to be implemented	Principal's Representative	Appendix K – CHMP

## **4. Monitor and Review**

### **4.1. Environmental Monitoring**

Environmental monitoring will be undertaken to verify:

- The environmental impacts predicted for the Development
- The effectiveness of environmental controls including management measures
- Progress of sustainability requirements
- Implementation of this CEMP.

Monitoring requirements under the Development Consent and the EPL for aspects such as air quality, noise and vibration, soil and water, traffic, heritage, waste and resources, and flora and fauna are included in the relevant sub-plans.

Where relevant, the CEMP sub-plan provides details on the following:

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

Responsibilities for monitoring activities are identified within Section 2.5 in addition to the aspect specific monitoring responsibilities identified within individual sub-plans.

Monitoring may also be required in response to incidents and this would be determined in accordance with the ICAM.

### **4.2. Observations and Inspections**

#### **4.2.1. Daily Observations**

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

Site environmental controls are to be inspected daily by the Site supervisor and site personnel. Each work team must inspect the environmental controls as relevant to their work area, in accordance with the ECM and ESCP.

Development activities which have a potential risk of significant impact on the environment (as identified in Section 3 of this CEMP) require more frequent inspections that may be attended by the Contractor's EM.

Any measures undertaken to repair environmental controls must be documented and reported to the Contractor's EM.

#### 4.2.2. Inspections

Table 4-1 provides a summary of the minimum inspections that are to be undertaken for the Development.

Table 4-1 Inspection Summary

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

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

The weekly environment and sustainability inspections are to cover environmental and social aspects of the Development which are relevant to the stage of works being undertaken. The purpose of these inspections is to:

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

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

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

### 4.3. Environmental and Sustainability Auditing

Development environmental and sustainability audits are to be undertaken in accordance with the EMS, CoCs and ISCA. This includes three internal sustainability audits and one independent (external) audit.

Auditing is to be undertaken in accordance with ISO19011:2014 – *Guidelines for Quality and/or Environmental Management Systems Auditing* by an ISO14001 accredited lead auditor.

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

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

#### 4.3.1. Internal Audits

Internal sustainability audits are to be undertaken quarterly thereafter on a rolling schedule. The fourth internal sustainability audit is to be replaced by the annual independent external audit. The audit scope is to be determined by the auditor based on current site activities.

#### 4.3.2. External Audits

External auditing is to be undertaken by an independent auditor every three years.

External audits are to focus on determining compliance with the CEMP, CoCs, FCMM and ISCA requirements as a minimum.

In accordance with CoC C18, within one year of the commencement of any Development under the CoC, and every three years thereafter, an Independent Environmental Audit of the Development is to be undertaken by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary. Audits are to be carried out in consultation with relevant agencies and the Development's Community Consultative Committee. Independent environmental audits are to be undertaken in accordance with guidance provided in *ISO 19011:2014 (or as updated) – Guidelines for Quality and/or Environmental Management Systems Auditing*.

The audits assess the environmental performance of the Development, compliance with the Development Consent and strategies, plans or programs required under the Development Consent; the adequacy of those strategies, plans or programs and make recommendations to improve the environmental performance of the Development and/or any of those strategies, plans or programs required by the Development Consent or approved under the EPBC Act.

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

#### **4.4. Non-conformance, Non-compliance and Actions**

##### **4.4.1. Non-conformances**

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

Where a non-conformance is also considered to represent a possible non-compliance, it is to be recorded as a potential non-compliance. Depending upon the nature of the non-conformance, the non-conformance may require reporting to the DPHI and ER as an incident (CoC C11 and C12).

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

Non-conformances with the implementation of the CEMP and sub-plans shall be recorded and addressed by logging the issue within the Development's Corrective Actions Register to be developed by the Construction Contractor and handled in accordance with the Environmental Management System. Non-conformances shall be recorded and addressed through Aconex.

##### **4.4.2. Non-compliances**

A non-compliance as defined in Development Consent SSD 7628 as *"an occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with this consent but is not an incident"*.

Non-compliances may also arise where an occurrence, set of circumstances or the Development is considered to be in non-accordance with the EPBC Act Approval (EPBC 2011/6086) CoA, REMMs or RCMMs. Incident response, classification and notification requirements are outlined in Section 2.9.

Potential non-compliances with the CoC can be identified by anyone and are to be reported to the Contractor's EM as a potential non-compliance. Whether the occurrence, set of circumstances, or Development requires to be notified to the DPHI as a non-compliance, is the responsibility of the Development proponent (or delegate thereof).

Non-compliances with the CoC are to be recorded and addressed by logging the issue within the Development Corrective Actions Register to be developed by the Construction Contractor and handled in accordance with the Environmental Management System. Non-compliances shall be recorded immediately and addressed through Aconex.

DPHI is to be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) within seven days after the Development becomes aware of any non-compliance (CoC C16 and C17). The notification must identify the Development and the application number for it, set out the condition of consent that the Development is non-compliant with, the way in which it does not comply, the reasons for the non-compliance (if known), and what actions have been, or will be, undertaken to address the non-compliance.

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

#### 4.4.3. Corrective and Preventative Actions

A correction action request is issued where there is a non-conformance or non-compliance with any of the requirements of this CEMP or Development requirements, respectively during site inspections, audits or incident investigations. Corrective action requests are differentiated by risk ranking.

The nominated timeframes to resolve items on the corrective actions register is detailed in Table 4-2.

Table 4-2 Corrective Actions Timeframe for Resolution

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

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

Preventive actions are dependent on the issue but may include:

- Progressive landscaping
- Early identification of the requirement for out of hours works
- Stopping of works based on forecast inclement weather
- Preparation of site to manage inclement weather.

Any member of the Development team, including sub-contractors, can contribute and provide suggestions to any preventative action.

Corrective actions may be required as a result of the following:

- Internal inspection outcomes that cannot be rectified immediately
- Incidents and associated corrective actions
- Internal audit observations/non-compliance
- Client audits or other notice of non-compliance
- Notices or action from regulatory authorities
- Breach of legislative requirements or permit/license conditions and Development approvals
- Repetitive observations which have not been resolved in a timely manner.

Corrective actions are dependent on the issue but may include:

- Site remediation and rehabilitation
- Increased environmental awareness (re-training, toolbox meetings)

- Review and improve existing environmental controls and update of environmental controls maps, or erosion sediment control plans.

#### **4.5. Management Review**

The Construction Contractors Management Team and Principal's Representative are to annually review the adequacy of the environmental controls and procedures within the CEMP to determine whether they are applicable to the activities being carried out on site. The management review is to be minuted and changes to the plan made by the Principal's Representative and submitted for approval as per Section 1.3.7.

An annual review of the Development is to be undertaken and submitted to DPHI, Liverpool City Council and the Campbelltown City Council (CCC), in accordance with the MPW EPBC Approval (2011/6086) for MAUW and CoC C10. The details of this review are outlined in Section 4.6.3.

In accordance with CoC C9, the strategies, plans and programs required under the Development Consent will be reviewed within three months of the:

- Submission of an annual review under condition C10
- Submission of an incident or non-compliance notification under condition C13
- Submission of an audit under condition C19
- Approval of any modification of the conditions of consent, or
- Issue of a direction of the Secretary under condition A2.

Where revisions are required, the revised document must be submitted to the Secretary for approval within six weeks of the review.

#### **4.6. Environmental Reporting**

Reporting requirements for specific environmental areas (e.g. noise, air quality, water quality, vegetation) are listed in the relevant aspect specific sub-plan.

##### **4.6.1. Monthly Environmental and Sustainability Reporting**

A monthly environment and sustainability report is to be prepared for the Contractor's WM for inclusion in the monthly Development report. This report is to include the following:

- Analysis of performance against the Development environmental objectives targets as per Section 1.8 and Table 2-7 of this CEMP
- Analysis of performance against targets set in the CEMP sub-plans and monitoring results
- Analysis of performance against conditions of the Development Consent
- Details of any environmental incident(s) including:
  - Actions taken or outstanding
  - Lessons learned
  - Results from incident investigation.
- Verification that the CEMP is compliant with the Contractor's EMS by referring to the number and results of inspections, audits, observations and monitoring

- Verification that the National Greenhouse and Energy Reporting and ISCA reporting requirements have been implemented during the month and summary of progress against ISCA requirements
- Identification of any environmental innovations or opportunities implemented on the Development.

The report is to be submitted to the Principal's Representative through Aconex within one week of month end.

Sustainability reporting requirements are to be provided to the Principal. Specific sustainability reporting requirements are detailed within the Sustainability Management Plan and aspect-specific management plans; the reporting requirements align with the overall Development Objectives and Targets as detailed in Section 1.8 and Table 2-7.

#### **4.6.2. Compliance Reporting**

In accordance with Condition 19 of the MPW EPBC approval (2011/6086), Condition 12 of the MPE EPBC approval (2011/6229) and CoC C21(c) the Principal's Representative are to submit reporting of compliance status to the appropriate approval authority, periodically, including but not limited to:

- A Pre-Construction Compliance Report prior to the commencement of construction (to the Secretary)
- Six-monthly Construction Compliance Reports (to the Secretary)<sup>3</sup>
- Annual EPBC Act Approval Compliance Report (to DCCEEW).

The Principal Representative is to compile and review the compliance issues identified in the Construction Contractor's monthly environment and sustainability reporting and submit the compliance report to the Secretary.

A Compliance Tracking Program has been developed for the Development as per CoC C21.

#### **4.6.3. Annual Environmental Management Review**

In accordance with the MPW EPBC Approval (2011/6086) for MAUW and CoC C10, an Annual Environmental Management Review of the Development will be prepared and submitted to the relevant regulatory agencies (including DCCEEW) each year. This report reviews the performance of the Development against the CEMP and includes, but not necessarily be limited to:

- Construction undertaken during the reporting period
- Proposed construction to be undertaken the following reporting period
- Details of compliance with the various conditions of approval and approved management plans (Commonwealth and State)
- A copy of the complaints register, and details of how these complaints were addressed and received

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<sup>3</sup> Following the approval of the SSD7628-Mod 3 application on 18 December 2020, the compliance reporting frequency for the Development changed from quarterly to six-monthly.



- Any discrepancies between the predicted and actual impacts of the Development and potential causes of any significant discrepancies
- A summary of incidents and non-compliances, including where environmental goals and objectives have not been achieved and corrective actions undertaken
- Proposed measures to improve environmental performance of the Development
- Copies of relevant independent environmental audit reports and compliance reports.

## APPENDIX A LEGISLATION REGISTER

## **APPENDIX B DEVELOPMENT PERMITS AND LICENCES REGISTER**

## APPENDIX C ASPECTS AND IMPACTS REGISTER

### Risk Rating Matrix

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

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

The table below shows the criteria for evaluating likelihood

Level	Descriptor	Description	Frequency of occurrence
A	Almost Certain	Is expected to occur in most circumstances	Once per month
B	Likely	Will probably occur in most circumstances	Between once a month and once a year
C	Possible	Might occur at some time	Between once a year and once in 5 years
D	Unlikely	Could occur at some time	Between once in 5 years and once in 20 years
E	Rare	May occur in exceptional circumstances	Once in more than 20 years

The table below shoes the criteria for evaluating consequence.

Level	Category	Safety	Financial	Operational	Environmental	Community
1	Not Significant	No medical control required	<\$100,000	< 6 hours disruption to operations	<p>Pollution release immediately contained on-site, no need for external assistance.</p> <p>No impact on native vegetation / fauna / fauna habitat.</p>	No community or stakeholder complaints
2	Minor	Lost time injury occurs or medical control required	≥ \$100,000 but less than \$1M	≥ 6 hrs but < 24 hrs disruption to operations	<p>Pollution release to environment contained on-site in &lt; 24 hours, no need for external assistance.</p> <p>Minor impacts to native vegetation / fauna / fauna habitat on-site.</p>	<p>Several community or stakeholder complaints.</p> <p>Complaints rectified within adequate timeframes.</p>
3	Moderate	Serious injury occurs	≥ \$1M but less than \$2M	≥ 24 hrs but < 48 hrs disruption to operations	<p>Pollution release to off-site environment with short-term, localised, detrimental effect.</p> <p>Moderate, short-term impact to vegetation / fauna / fauna habitat requiring action to correct or minor impact on threatened species or communities.</p>	<p>Multiple and sustained community or stakeholder complaints.</p> <p>Complaints addressed after an interval.</p> <p>Limited media coverage of issues raised.</p>
4	Major	Single fatality occurs	≥ \$2M but less than \$10M	≥ 2 days but < 5 days disruption to operations	<p>Pollution release to off-site environment with medium-term, regional detrimental effect.</p> <p>Major, medium-term impact to vegetation / fauna / fauna habitat requiring action to correct or moderate impact on threatened species or communities.</p>	<p>Widespread community and stakeholder concern.</p> <p>Sustained failure to address complaints.</p> <p>Extensive media coverage.</p>

5	Severe	Multiple but localised fatalities occur	≥ \$10M	≥ 5 days disruption to operations	<p>Pollution release to off-site environment with long-term, wide-spread detrimental effect.</p> <p>Severe, long-term impact to vegetation / fauna / fauna habitat or major impact on threatened species or communities.</p>	<p>Ongoing and widespread community and stakeholder concern, culminating in litigation.</p> <p>Inability to address complaints.</p> <p>Extensive and sustained negative media coverage.</p>
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## **APPENDIX D ENVIRONMENTAL CONTROL MAPS**



## **APPENDIX E CONSTRUCTION TRAFFIC AND ACCESS MANAGEMENT PLAN**

## **APPENDIX F CONCRETE BATCHING PLANT MANAGEMENT PLAN**

To be included prior to establishment of Concrete Batching Plant in accordance with CoC B31.

## **APPENDIX G CONSTRUCTION SOIL AND WATER MANAGEMENT PLAN**

## **APPENDIX H FLOOD EMERGENCY RESPONSE PLAN**

## **APPENDIX I CONSTRUCTION AIR QUALITY MANAGEMENT PLAN**

## **APPENDIX J CONSTRUCTION NOISE AND VIBRATION MANAGEMENT PLAN**

## **APPENDIX K CONSTRUCTION HERITAGE MAANGEMENT PLAN**

## **APPENDIX L CONSTRUCTION FLORA AND FAUNA MANAGEMENT PLAN**



## **APPENDIX M CONSTRUCTION AND DEMOLITION WASTE MANAGEMENT PLAN**

## **APPENDIX N CONTAMINATION MANAGEMENT PLAN**

## **APPENDIX O BUSHFIRE EMERGENCY AND EVACUATION PLAN**

## **APPENDIX P LIGHT SPILL MANAGEMENT**

## P.1 Purpose

This Appendix has been developed for the construction period of the Development, to address the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Approval (EPBC 2011/6229 and EPBC 2011/6086) and forms part of the Construction Environmental Management Plan.

## P.2 Local Context

A number of residential suburbs are located in proximity to the Development site. The approximate distances of these suburbs to the MPE Stage 2 site and the Moorebank Avenue site are provided below:

Suburb	Distance to MPE Stage 2 site	Distance to Moorebank Avenue site
Wattle Grove	360 m to the north-east	865 m to the north-east
Moorebank	1300 m to the north	1430 m to the north
Casula	820 m to the west	760 m to the west
Glenfield	1830 m to the south-west	1540 m to the south-west

The land surrounding the site includes:

The Moorebank Precinct West (MPW) site, formerly the School of Military Engineering (SME) on the western side of Moorebank Avenue, which is owned by the Commonwealth

The area immediately south of the MPE Site, known as the 'Southern Boot Land', includes an existing rail spur within a vegetated remnant bushland. The East Hills Rail Corridor is south of the Southern Boot Land, which is owned and operated by Sydney Trains. Further to the south is the Holsworthy Military Reserve, which is owned by the Commonwealth

The Boot Land, to the immediate east of the MPE Site between the eastern site boundary and the Wattle Grove residential area, which is owned by the Commonwealth

The Defence Joint Logistics Unit (DJLU) is located immediately north and north-east of the MPE Site.

EPBC 2011/6229 condition 7b) states that consideration must be given to people and communities at SME, Defence National Storage and Distribution Centre (DNSDC), Department of Defence housing and the environment more generally in neighbouring bushland areas. The SME and Defence housing have been relocated off the MPW site to the Holsworthy Barracks and are no longer sensitive receivers to the MPE Site. Therefore, consultation with Defence regarding proposed mitigation measures for light spill impacts, as required in Condition 7i) is no longer considered relevant.

The DNSDC has been relocated to the Defence Joint Logistics Unit (DJLU), to the north of the MPE Site, and is listed as a sensitive receiver in the MPE Stage 2 EIS.

### **P.3 Construction Impacts**

Lighting would be required during construction of the Development to illuminate within ancillary facilities, and on plant and equipment.

The MPE Stage 2 EIS states that the impacts of light spill during construction of the Development are expected to be minor as it would be localised and temporary in nature. There is a considerable separation of residential dwellings from the Development site, which would further reduce the impact of this lighting during construction.

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

### **P.4 Management Measures**

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

Temporary lighting (fixed and portable) will be designed and located to minimise the effects of light spill on surrounding sensitive receivers (MPW Response to Submission Management and Mitigation Measure 14C)

No lights will be installed above the height of 40 m or, the maximum approved height of the intermodal warehouse buildings (whichever is less) (EPBC Act Approval (2011/6229) 7(e))

Where required for construction works, cut-off and directed lighting would be used and lighting location considered to minimise glare and light spill (MPE Stage 2 FCMM 8A)

Potentially affected residents and relevant authorities will be notified in advance of any out of hours works (MPW PEMF).

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

### **P.5 Monitoring**

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

Inspections will focus on the following key issue:

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

An Environmental Inspection Checklist will be used to maintain compliance and effectiveness of controls. Items that require action will be documented during environmental inspections and notified to the relevant Site Supervisor. The Site Supervisor

will be responsible for providing appropriate resources in terms of labour, plant and equipment to enable the items to be rectified in the nominated timeframes.

Further monitoring referred to in the MPW PEMF applies to the operation phase of the Development (and not the construction phase).

## **APPENDIX Q MARW DEVELOPMENT BOUNDARY**



## **APPENDIX R CONSTRUCTION COMMUNITY COMMUNICATION STRATEGY**

## **APPENDIX S MIP SUSTAINABILITY POLICY**