Moorebank Logistics Park

Pollution Incident Response Management Plan (PIRMP)

Environment

FINAL

Prepared for:
LOGOS MLP Development Management Pty Ltd

Doc. Ref. MP-PIRMP -01

Date 05/06/2025

Revision 8

Contaminated Land Advisory

Project Management

Cost & Risk Advisory

Expert Reports

Safety

Document Control

Version	Date	Description of Revision	Prepared by	Reviewed by	Approved by
0	16/10/2018	Final	[redacted]	[redacted]	[redacted]
1	10/05/2019	General Update for Variation EPL	[redacted]	[redacted]	[redacted]
2	25/06/2019	Minor update to Section 6.2.3	[redacted]	[redacted]	[redacted]
3	29/06/2020	General Update	[redacted]	[redacted]	[redacted]
4	29/7/2020	Minor revisions	[redacted]	[redacted]	[redacted]
5	14/07/2021	Annual Review	[redacted]	[redacted]	[redacted]
6	12/10/2022	Annual Review	[redacted]	[redacted]	[redacted]
7	26/07/2023	Annual Review	[redacted]	[redacted]	[redacted]
8	05/06/2025	Annual Review – Updates shown in Blue	[redacted]	[redacted]	[redacted]

Prepared for LOGOS MLP Development Management Pty Ltd

Construction and Remediation Advisory Services (CARAS)
ABN 45 121 538 458
e info@caras.com.au
p 02 9929 2362

LIMITATIONS

This plan was prepared for LOGOS MLP Development Management Pty Ltd for the purpose/s stated in Section 1. Construction and Remediation Advisory Services (CARAS) has prepared this document in good faith but is unable to provide certification outside of areas over which we had some control or was reasonably able to check. The plan also relies upon information provided by third parties. CARAS has undertaken all practical steps to confirm the reliability of the information provided by third parties and does not accept any liability for false or misleading information provided by these parties. It is not possible in this document to present all data, which could be of interest to all readers of this plan. Readers are referred to referenced documentation for further data. Users of this document should satisfy themselves concerning its application to, and where necessary seek expert advice in respect to, their situation. All work conducted and documents produced by CARAS are based on a specific scope and have been prepared for LOGOS MLP Development Management Pty Ltd and therefore cannot be relied upon by any other third parties unless agreed in writing by CARAS. The documents(s) and/or information produced by CARAS should not be reproduced and/or presented/reviewed except in full.

Contents

Tables

Figures

Glossary/Abbreviations

Term	Meaning
CBD	Central Business District
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
DPHI	Department of Planning, Housing and Infrastructure
EPA	NSW Environment Protection Authority
EPL	Environment Protection License
ISO	International Organization for Standardization
LGA	Local Government Authority
LOGOS	LOGOS MLP Development Management Pty Ltd
OEH	Office of Environment and Heritage
MPE	Moorebank Precinct East
MPE Stage 1	Moorebank Precinct East Stage 1 – As defined in the State Significant Development (SSD) consent (SSD – 6766)
MPE Stage 2	Moorebank Precinct East Stage 2 – As defined in the State Significant Development (SSD) consent (SSD – 7628)
MLP	Moorebank Logistics Park
MPW	Moorebank Precinct West
MPW – Early Works	Moorebank Precinct West – Early Works consent as defined in the State Significant Development (SSD) consent (SSD – 5066)
POEO Act	Protection of the Environment Operations Act 1997
PIRMP	Pollution Incident Response Management Plan
PC	Principal Contractor
PPE	Personal Protective Equipment
The Premises	PART LOT 100 DP 1049508, LOT 101 DP 1049508, PART LOT 1 DP 1197707, LOT 2 DP 1197707, PART LOT 4 DP 1197707, LOT 13 DP 1251885, PART LOT 27 DP 1253673, PART MOOREBANK AVENUE, MOOREBANK (SOUTH M5 MOTORWAY) AND PART ANZAC ROAD, MOOREBANK. collectively referred to as Moorebank Logistics Park
RMS	Roads Maritime Service
SSD	State Significant Development as defined in at Division 4.7 of the Environmental Planning and Assessment Act 1979

1 Introduction

1.1 Premises details

1.1.1 The Moorebank Logistics Park (**the Premises**) is situated within the Liverpool City Council and is located approximately 2.5km from the Liverpool City Centre and approximately 27km southwest of the Sydney Central Business District (**CBD**).

1.1.2 The Premises is legally defined as: PART LOT 100 DP 1049508, LOT 101 DP 1049508, PART LOT 1 DP 1197707, LOT 2 DP 1197707, PART LOT 4 DP 1197707, LOT 13 DP 1251885, PART LOT 27 DP 1253673, PART MOOREBANK AVENUE, MOOREBANK (SOUTH M5 MOTORWAY) AND PART ANZAC ROAD, MOOREBANK. The Premises are defined in the Appendix A of this Pollution Incident Response Management Plan (**PIRMP**).

1.1.3 The development of the Premises involves the construction of intermodal facilities which will be linked to Port Botany, the interstate road networks and the interstate freight rail network.

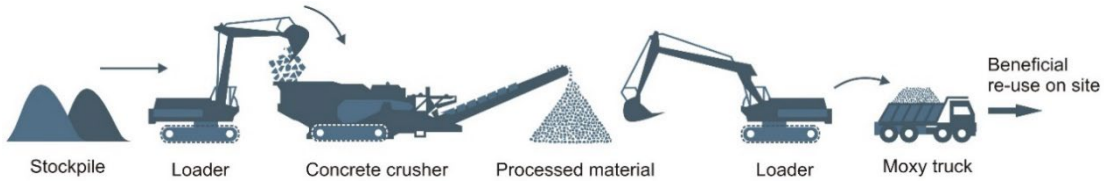
1.2 Context

1.2.1 It is the intention of LOGOS MLP Development Management Pty Ltd (**LOGOS**) to engage a Principal Contractor(s) (**PC**) to carry out the scheduled activities as part of construction works on the Premises. The PC shall carry out the scheduled activities in accordance with Environment Protection Licence (**EPL**) 21054 and the Construction Environmental Management Plan (**CEMP**) applicable to the portion of the Premises where the scheduled activity is being carried out.

1.3 EPL Overview

1.3.1 EPL No 21054 was issued to QUBE for the Premises by the NSW Environmental Protection Authority (EPA) on 4th June 2018 for the activity of crushing, grinding and separating of material. This EPL covered the Crushing, grinding, and separating (Figure 1) as the only scheduled activity allowed on the site. An amendment of this EPL was issued on 18th April 2019, Variation No. 1 to include the Extractive Activities as another scheduled and fee-based activity allowed to this site as specified in the Table 1. EPL No 21054 was transferred to LOGOS on the 7th of March 2022.

Figure 1: Crushing, Grinding and Separating Flow Chart



1.3.2 The EPL was further amended on the 18th August 2023 to allow the scheduled activity Contaminated soil treatment, namely the stockpiling of contaminated soils and the inclusion of containment cells in the south-eastern corner of MPW stage 2 described as "Eagles Beak" and under hardstand in the northern part of the Premises.

1.3.3 The EPA determined that as the containment cells are not intended for later re-use, the ongoing containment does not trigger the EPL requirement after the containment cell is complete and these areas will be managed under the Long-Term Environmental Management Plan (**LTEMP**).

1.3.4 The containment cell works are now complete and the LTEMP is the active document for compliance in the event of any disturbance in these areas.

1.3.5 Under section Part 5.7A Section 153A of the Protection of the Environment Operations Act 1997 (**POEO Act**) all EPL holders must prepare a PIRMP.

1.3.6 Details of the EPL are given in Table 1.

Table 1: Details of EPL

EPL No.	21054
Anniversary Date	4-June
Licensee	LOGOS MLP DEVELOPMENT MANAGEMENT PTY LTD
Licensee's Address	Level 29/88 Phillip Steet, Sydney, NSW,2000
Premises	Moorebank Precinct, Moorebank, NSW, 2170
Scheduled Activities	Contaminated soil treatment Crushing, grinding or separating
Scale	Contaminated soil treatment – Any annual handling capacity Crushing, grinding or separating - >100,000 – 500,000 T annual processing capacity

1.4 Plan Availability

1.4.1 A copy of this plan is to be maintained at the site office on the Premises.

1.4.2 This plan will be made available to anybody that request it on the 1800 986 465.

1.4.3 A copy of this plan and its revisions will be available 14 days after the issue or revision of this document on site and online at the website: www.simta.com.au/project-wide.

1.5 Plan Objectives

1.5.1 The objectives of this PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the Premises, the EPA, other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health,

SafeWork NSW and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident;

- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks; and,
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.

2 Legislative and Regulatory Requirements

2.1 Relevant Legislation

2.1.1 Key environmental legislation relating to pollution incident response management includes:

- Protection of the Environment Operations Act 1997 (POEO Act);
- Protection of the Environment Operations (General) Regulation 2009; and
- Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012.

2.2 Guidelines and Standards

2.2.1 Key environmental guidelines relating to pollution incident response management includes:

- Environmental guidelines: Preparation of pollution incident response management plans, 2012.
- RMS: Environmental Incident Classification and Reporting Procedure Sep 2017.

2.3 Legislative Requirements

- Key environmental legislation relating to pollution incident response management are summarised in Table 2:

Table 2: Plan requirements

General Requirements for preparing PIRMPs	Legislative Reference of POEO Act.	Legislative Reference of POEO (G) Regulation.	Reference Section of this Plan
Form of plans			
▿ Written form and available at the premises.	Section 153D	Section 98B (1)	Section 1.4
▿ Made available on request.	Section 153D	Section 98D (1)	Section 1.4
▿ May form part of another document (i.e., existing emergency plan or incident management plan) as long as it is readily identifiable as such in that other document, and it meets the requirements of section 153C of POEO Act and the POEO (G) Regulation.		Section 98B (2)	N/A
▿ Made publicly available in the 14 days after it has been prepared: i) At an accessible website. ii) If there is not a website, providing a copy of the plan to anybody that requests it.		Section 98D (2)	Section 1.4
Main hazards			
▿ Description and likelihood of the main hazards to human health or the environment associated with the activity undertaken at the premises.		Clause 98C (1)(a) and (b)	Section 4.5
Procedures			
▿ Procedures to be followed by the EPL holder or the occupier of the premises, in notifying: a) The owners or occupiers of premises in the premises. b) The local authority. c) Any persons or authorities that required to be notified by Part 5.7 of the Act.	Section 153C (a)		Section 6
▿ The procedures to be followed for co-ordinating with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident.	Section 153C (c)		Section 6
Actions			
▿ Pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or the environment.		Clause 98C (1)(c)	Section 4.4
▿ A detailed description of the action to be taken immediately after a pollution incident, to reduce or control any pollution.		Clause 98C (1)(l)	Section 4.4
Contacts Details (name, role and 24h phone number)			
▿ Of the key personnel responsible for activating the plans and managing the response.		Clause 98C (1) (g)	Section 7
▿ Of the EPA, the local council, NSW Ministry of Health, WorkSafe NSW and Fire and Rescue NSW, relevant to the licensee's premises. ▿ Of any other organisation or agency that needs to be advised).		Clause 98C (1) (h)	Section 7
Inventory			

General Requirements for preparing PIRMPs	Legislative Reference of POEO Act.	Legislative Reference of POEO (G) Regulation.	Reference Section of this Plan
▽ Inventory of potential pollutants to be kept at the premises.			Section 4.1
Safety Equipment			
▽ A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident.		Clause 98C (1) (f)	Section 5.2
Community Liaison			
▽ Details of the mechanisms that will be used for communicating with the community in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on.		Clause 98C (1) (i)	Section 6.3
Risk Minimisation			
▽ Details of the arrangements for minimising the risk of harm to any persons on the premises. ▽ a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk.		Clause 98C (1)(j)	Section 4.5
Map or set of Maps			
▽ Detailed map or maps showing the location of: • The premises which the license relates. • The surrounding area likely to be affected by a pollution incident. • The location of any pollutants. • The location of any storm water drains. • The discharge locations of the storm water.		Clause 98C(1)(k)	Appendix A
Staff Training			
▽ The nature and objectives of any staff training program in relation to the plan.		Clause 98C(1)(m)	Sections 5.3
Plan Testing			
▽ The dates on which the plan has been tested and the name of the person who carried out the test. ▽ The manner in which the plan is to be tested and maintained.	Section 153E	Section 98E and 98C (n), (p), (f)and (g)	Section 8.3
Plan Updates			
▽ The dates on which the plan is updated.		Section 98C (o)	Section 9.1

3 What is a Pollution Incident?

3.1 Pollution Incident Definition

3.1.1 For the purposes of this plan the definition of 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, but it does not include an incident or set of circumstances involving only the emission of any noise.*

3.2 Pollution Incidents that require notification

3.2.1 A pollution incident is required to be notified if there is a risk of 'material harm to the environment' as a result of activities undertaken by the PC or delegate in relation to the scheduled activities. Material Harm is defined in section 147 of the POEO Act as:

> (a) harm to the environment is material if:
>
> (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
>
> (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and
>
> (b) 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.

3.2.2 In the event of a pollution incident the PC shall notify the Superintendent who will determine whether or not the incident is required to be notified.

3.2.3 In the event of a pollution incident the following stakeholders must be notified immediately by the PC;

- NSW EPA;
- NSW Department of Planning, Housing and Infrastructure (DPHI);
- NSW Health;
- Fire and Rescue NSW;
- SafeWork NSW; and
- Local Council.

3.3 Pollution Incident Types

3.3.1 Pollution incidents that could potentially occur at the Premises and which are covered by this plan include;

- material, such as waste materials, dust, hydrocarbons, that travel beyond the site boundary causing or potentially causing adverse impact to the environment or community; and,
- discharge of waters from site not in accordance with the EPL (21054) conditions.

3.3.2 Small spills that do not leave the site boundary and which are cleaned up without material harm to the environment or residual environmental impact will be managed and will not require notification to the EPA or other authorities, however all such incidents are to be recorded, categorised, and reported in accordance with the relevant Project CEMP.

3.3.3 The three categories of environmental incidents that have been adopted from and described in Table 16 Environmental Incident Classification from the CEMP are detailed in Table 3.

Table 3: Environmental Incident Classification

Incident Category	Direct Cost including clean up	Impact
Class 1	Up to $10,000	▼ Pollution or degradation which has low severity impacts on the community and/or environment in the short-term (<1 month duration) and is fully reversible with no residual impacts. ▼ Harming a protected animal that is not vulnerable or threatened.
Class 2	$10,000 to $100,000	▼ Pollution or degradation which has moderate severity impacts on the community and/or environment (1-3 months duration) but is fully reversible with no residual impacts. ▼ Harming an animal that is (or is part of) a vulnerable species or vulnerable ecological community. ▼ Picking a plant that is (or is part of) a vulnerable species or vulnerable ecological community.
Class 3	More than $100,000	▼ Pollution or degradation which has high severity impacts on the community and/or environment and may have irreversible residual impacts. ▼ Harming an animal that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community) (S2.1). ▼ Picking a plant that is (or is part of) a threatened species or threatened ecological community (other than a vulnerable species or community). ▼ Damaging a declared area of outstanding biodiversity value. ▼ Knowingly damages any habitat of a threatened species or threatened ecological community. ▼ Contravention of a stop work order.

4 Pollution Risk Assessment

4.1 Pollutant Inventory

4.1.1 A list of potential pollutants, the estimated quantities that may be stored at the Premises, and the approximate location of each pollutant is detailed in Table 4 below.

Table 4: Inventory of pollutants

Pollutant	Estimated Quantity	Location
Hydraulic oil, transmission fluid, engine oil, anti-freeze, gearbox and diff oils	1,000 litres	Likely to be stored in drums on bunded pallets in the yard.
Asbestos and/or PFAS impacted soils	30,000 – 250,000 T	Placed in the nominated Containment Cell locations

4.2 Risk Assessment Overview

4.2.1 The risk assessment process documented in this Project Risk Assessment is based on the principles of ISO3100:2009 Risk Management – Principles and Guidelines. This process provides a structured approach to assessing risk of a pollution incident.

4.3 Risk Analysis

4.3.1 The risk matrix used to evaluate the risk on this project is illustrated below where the risk is assigned a score based on the Likelihood rating (Table 5) and consequence rating (Table 6). The score assigned to the risk corresponds to a risk rating from low to extreme as illustrated in Table 8.

4.3.2 The PC shall carry out a detailed risk assessment in accordance with the CEMP.

Table 5: Classification of Likelihood

Probability	Description	Likelihood Rating
Almost Certain	More than once a month	A
Likely	Less than once a month, but more than once per year	B
Possible	Less than once per year, but more than once per five years	C
Unlikely	Less than once per five years	D
Rare	Unlikely to ever occur	E

Table 6: Classification of Consequence

Consequence Level	Negligible	Minor	Moderate	Major	Severe
Consequence Score	1	2	3	4	5
Consequence Criteria					
Environmental Consequence	Minor localised environmental incident	Onsite or Offsite environmental incident immediately resolved	Onsite environmental incident with detrimental effects	Offsite environmental incident with detrimental effects	Offsite or Onsite environmental incident with significant detrimental effects

Table 7: Qualitative Risk Evaluation Matrix

Consequence Rating / Likelihood Rating	Negligible (1)	Minor (2)	Moderate (3)	Major (4)	Severe (5)
Almost Certain (A)	11	16	20	23	25
Likely ((B))	7	12	17	21	24
Possible (C)	4	8	13	18	22
Unlikely (D)	2	5	9	14	19
Rare (E)	1	3	6	10	15

Table 8: Risk Evaluation Summary

Risk Rating	Risk Score	Risk Acceptability
Low	1 – 6	Acceptable
Moderate	7 – 10	Acceptable with management controls
High	11 - 19	Unacceptable
Extreme	20 – 25	Unacceptable

4.4 Risk Identification

4.4.1 The potential risks associated with the activities being carried out on the Premises have been identified and assessed. The details of this risk assessment are detailed in Table 9.

4.5 Pre-emptive Actions/ Controls

4.5.1 Pre-emptive actions are those actions to be taken to minimise or prevent any risks of harm to human health or the environment arising from the scheduled activity. The specific pre-emptive actions to be undertaken to mitigate the risks on the Premises are detailed in Table 9.

Table 9: Pollution Incident Residual Risk Assessment (after controls)

Potential Hazard	Potential Risk	Control Measure	Responsibility	Consequence	Likelihood	Residual Risk Rating
Spillages of contaminants into waterways (chemical, fuel, hazardous liquids…)	Discharge into the storm water	▿ Construction Environmental Management Plan (CEMP) with an Incident Response Plan and Spill Management Procedure ▿ Run-off controls ▿ Provision of Material Safety Data Sheet ▿ Plan and implement works to minimise the possibility of pollution ▿ Use and storage of chemicals strictly in accordance with relevant legislation, manufacturer and the Safety Data Sheets. ▿ Spill kits located with adequate quantities of emergency response material are readily available in the proximity to oil storage areas or next to the machinery that is carrying out the activity, to contain the spillage on time ▿ Where safe to do so, install containment measures such as sandbags, booms, earth bunds or cut drains to capture and retain spilled material and prevent it from leaving site, entering any watercourse or impacting on vegetation stands	Principal Contractor Environmental Manager	Minor	Unlikely	**Moderate**
Sediment tracking off -site	Sediment on public roads	▿ Import Fill Material protocol ▿ Use of Wheel wash before leaving the site ▿ Toolboxes to truck drivers to explain wet days procedures ▿ Use of road sweepers	Principal Contractor Environmental Manager	Moderate	Rare	**Low**
Spillage from machinery or vehicles	Discharge onto the land	▿ Provision of a CEMP to include an Incident Response Plan and Spill Management Procedure ▿ Plant Inspection checklist daily ▿ Spill kits with adequate quantities of emergency response materials located in the proximity to oil storage areas	Principal Contractor Environmental Manager	Moderate	Rare	**Low**
Discovery of potentially contaminated soil/material (including but not limited to: Asbestos, PFAS, ASS, hydrocarbon compounds,	Contaminated soil and ground water/surface waters.	▿ CEMP and associated sub plans ▿ Environmental testing and verification of the import material prior to arrival on site ▿ Site inspections ▿ Document review of previous uses of the land Construction work to follow the CEMP and associated sub plans ▿ PCs to be appropriately qualified and train in handling and management contaminated materials	Principal Contractor Environmental Manager	Minor	Unlikely	**Moderate**

Potential Hazard	Potential Risk	Control Measure	Responsibility	Consequence	Likelihood	Residual Risk Rating
contaminated import material)	Potential health risk	/ASS				
Fugitive dust or particulate matter (PM) generated during the activity	Effects on the Air Quality	▽ Use of water carts ▽ CEMP ▽ Procedures to reject excessively smoky trucks visiting the site based on visual inspection. ▽ Implementation and communication of anti-idling policy for trucks ▽ Complaints procedure for the community to report on excessive idling and smoky vehicles	Principal Contractor Environmental Manager	Moderate	Rare	**Low**
Fire	Smoke (due to onsite fire) causing impact to human health (inhalation)	▽ Emergency response/evacuation procedures. ▽ Fire/Smoke Monitoring system ▽ Fire extinguishing equipment located in all sheds and other locations around the site.	Principal Contractor Environmental Manager	Moderate	Rare	**Low**

5 Preparedness

5.1 Responsibilities

5.1.1 The following table illustrate these roles and responsibilities for the scheduled activities.

Table 10: Roles and responsibilities

Roles	Responsibilities
Principal	▽ Compliance with EPL, LTEMP and PIRMP; and, ▽ Organize annual reviews and drills.
Principal Representative	▽ Compliance with EPL, CEMP, LTEMP and PIRMP.
Contractor's Project Manager (Contractor's PM)	▽ Compliance with EPL, CEMP, LTEMP PIRMP; ▽ Oversees the implementation and maintenance of the CEMP, LTEMP and this PIRMP; ▽ Report environmental incidents to the Principal Representative and other relevant parties; ▽ Sign off on all environment and sustainability inspections; ▽ Monitoring; ▽ Internal audits; ▽ Take action to resolve environmental non-compliances and incidents; ▽ Authorise expenditure to implement environmental management requirements within limits of authority as defined in the Principal's Representatives Project requirements; ▽ Undertake ICAM investigations; ▽ Review audit corrective actions and take action as necessary to ensure timely close out of issues; ▽ Be contactable 24 hours a day; ▽ 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; and, ▽ Stop work if there is potential for a safety or environmental incident to occur.
Contractor's Construction Manager (Contractor's CM)	▽ Compliance with EPL, CEMP, LTEMP and PIRMP; ▽ Communicating with all personnel and sub-contractors regarding compliance with the CEMP and LTEMP; ▽ Identifying resources required for implementation of the PIRMP; ▽ Incident Reporting; ▽ Take action to resolve non-compliances and incidents; and, ▽ Be contactable 24 hours a day.
Contractor's Community Liaison Manger (Contractor's CLM)	▽ Implement the Community Consultation Strategy; ▽ Assist the Contractor's EM in consulting regulatory agencies and community; ▽ Communicate potential environmental impacts to the community and all stakeholders; ▽ Manage the resolution of environmental complaints; and, ▽ Act as a 24-hour contact (if other staff as outlined above are not available).

Roles	Responsibilities
Contractor Environmental Manager (Contractor's EM)	▽ Check and monitor the implementation of this PIRMP; ▽ Report to the Contractor's CM on environmental issues; ▽ Monitor the rectification and reporting of incidents; ▽ Provide technical advice to personnel and management in the review of work methods; ▽ Development, implementation, monitoring and updating of the PIRMP; ▽ Ensure environmental risks of the Project are identified and appropriate mitigation measures implemented; ▽ Develop environmental site induction and maintain a register of attendance; ▽ Present and participate in toolbox meetings; ▽ Manage environmental document control, reporting, inductions and training; ▽ Oversee site monitoring, inspections and internal audits; ▽ 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; ▽ Act as a 24-hour contact (if other staff as outlined above are not available); ▽ Liaise with construction team as required in order to implement the ISCA requirements; ▽ 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; and, ▽ Cooperate and participate in audits and action results of any audit findings.
Site Supervisor	▽ Implement environmental controls on-site; ▽ Present and participate in toolbox talks and meetings; ▽ Monitor the skills required by workers to effectively implement the PIRMP; ▽ Meet environmental and incident reporting requirements of the Project; and, ▽ 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.
Technical Advisor	▽ Development and compliance with the PIRMP.
All Personnel	▽ Minimise the potential of pollution of land, air and water; ▽ Preserve the natural and cultural heritage environment; ▽ Report incidents to the relevant parties; ▽ Take all feasible and reasonable steps to comply with the requirements of this PIRMP; ▽ Comply with the relevant Acts, Regulations and Standards; ▽ Comply with the Project policies and procedures; ▽ Comply with the CEMP, LTEMP and sub-plans; and ▽ Comply with lawful management directions.

5.2 Safety Equipment

5.2.1 The Principal Contractor shall supply all safety equipment including Personal Protective Equipment (**PPE**), spill kits, ventilated lockable chemical storage areas in accordance with the CEMP and Workplace Health and Safety Management Plan.

5.3 Training

5.3.1 The Principal Contractor must ensure all personnel working on the licensed activity on the Premises will be trained as follows:

- Existing employees/existing contractors- during the regular toolboxes and pre-starts meetings;
- New employees/new contractors informed of the location of this PIRMP when inducted to the site; and,
- Personnel involved in emergency response activities- will be provided with specific training.

5.3.2 Additionally, the Principal Contractor must provide specific training will be in the following areas

- Spill minimisation measures and spill response.

5.3.3 The Principal Contractor must maintain records of the staff training. Records must be available upon request by the Principal.

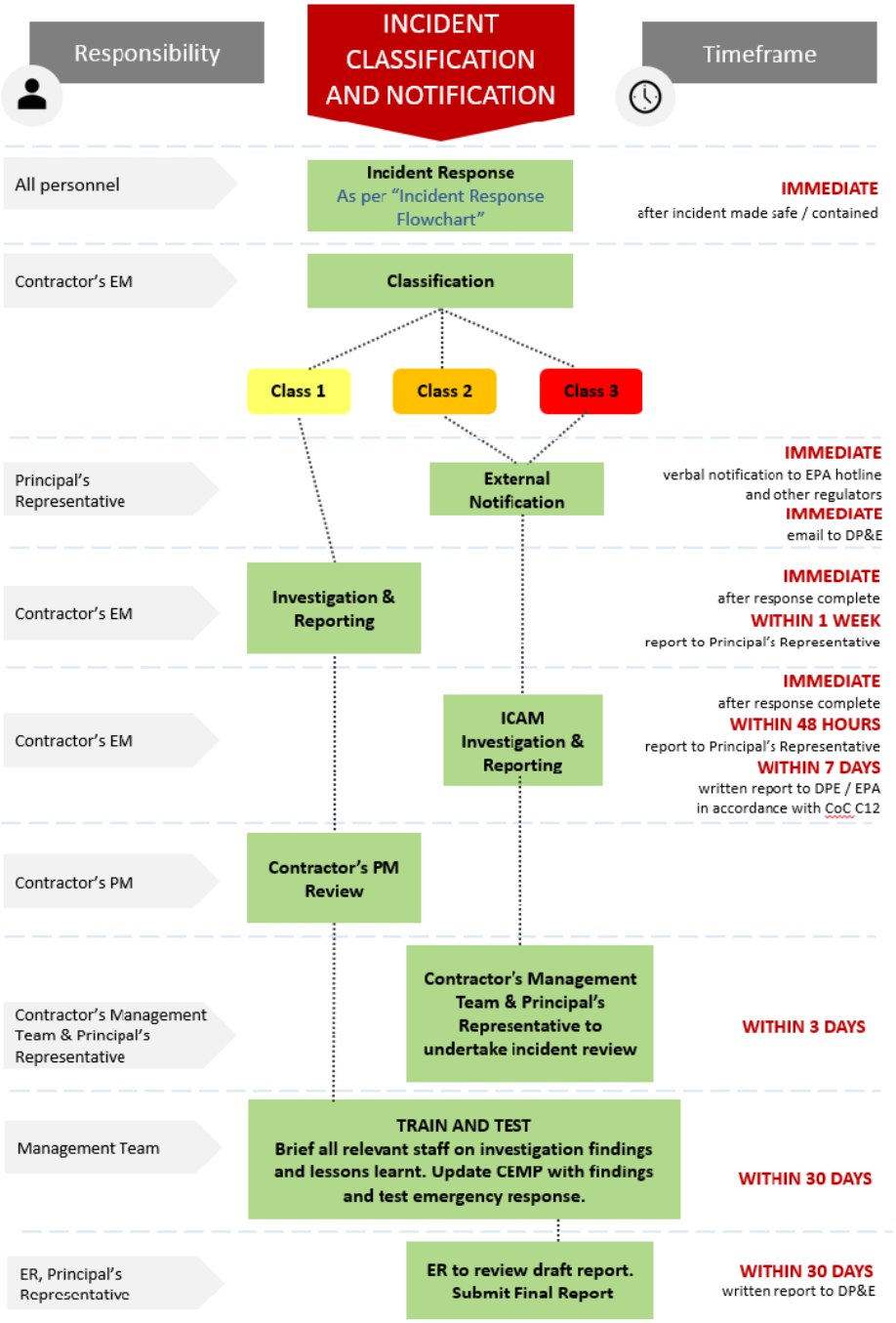
6 Implementation

6.1 Pollution Incident Response Procedure

6.1.1 The Principal Contractor must respond to the incident in accordance with the CEMP, the LTEMP the Moorebank Intermodal Precinct Incident Management Process (Appendix B) and this PIRMP.

6.1.2 The procedure to follow in the case of a pollution incident on the Premises related to the licensed activities are given in Figure 2 below.

Figure 2: Pollution Incident Response Management Process as per relevant CEMP



6.2 Notification

6.2.1 Relevant parties are required to be notified in accordance with Pollution Incident Response Management Process in Figure 2, with the exact process dependant on the Class of the Incident.

6.2.2 In accordance with the Moorebank Logistics Park Incident Management Process, the Contractor must notify the Superintendent and the Principal:

- immediately of any accident or incident that involves serious injury, hospitalisation or a fatality; otherwise
- within 15 minutes of any accident or incident that involves attention of media, Minister for Finance, Minister for Infrastructure, or Local Members; otherwise
- within 2 hours of any WHS or environmental incident that is notifiable; otherwise
- as soon as practicable of any incident which had actual or potential significant on-site or off-site impacts on human health or the environment.

6.2.3 The Contractor must provide full written details of the incident and corrective actions to the Principal and the Superintendent of the incident within an Incident Report, Corrective Action Report and Monthly Report. The information that needs to be reported includes:

1. Time, date, location and likely duration of incident;
2. Location of place where pollution is occurring or likely to occur;
3. Type of incident (e.g., chemical spill, water pollution etc.);
4. Extent of incident (e.g., magnitude of spill, area covered etc.); and
5. Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution.
6. Notifications to authorities must be verbal communication (i.e. – via telephone call.)

6.2.4 In accordance with Section 3, where an incident also requires notification to the EPA and to inform the DPHI. The incident report prepared for the purposes of notifying the EPA and to inform DPHI must include the following (as per the CEMP):

1. Identify the development and application number
2. Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
3. Identify how the incident was detected;
4. Identify when the Applicant became aware of the incident;
5. Identify any actual or potential non-compliance with conditions of consent;
6. Describe what immediate steps were taken in relation to the incident;
7. Identify further action(s) that will be taken in relation to the incident; and
8. Identify a project contact for further communication regarding the incident

6.2.5 The PC must record information provided during notification of a pollution incident in accordance with the CEMP.

6.3 Community Notification

6.3.1 In the event of a pollution incident, notifications will be communicated to potentially affected community members in accordance with the CEMP and Community Communication Strategy.

6.3.2 Early warnings to affected community must be given when practicable.

6.3.3 Community liaison officers must advise of any relevant information during Community Consultation Committee meetings. This must include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants or avoiding the use of water creeks or rivers affected by a pollutant discharge.

6.4 Clean-Up

6.4.1 In the event of a pollution incident the PC must clean up the pollution in consultation with the relevant authorities and in accordance with the CEMP and LTEMP.

6.5 Incident Investigation

6.5.1 Following a pollution incident, the PC must carry out an investigation in accordance with the CEMP.

7 Contact Details

7.1.1 In the event of a pollution incident the external agencies and all relevant stakeholders of the project must be contacted immediately in accordance with the flowchart in Figure 2.

7.1.2 Regular updates if required will be provided to the affected community throughout the course of event by one of the key contacts.

7.1.3 Details for external agencies and key project stakeholders are provided below.

Table 11: Contacts Details for external agencies

Department	Contact Details
Environment Protection Authority	13 15 55
Department of Planning, Housing and Infrastructure	compliance@planning.nsw.gov.au
Local Council Liverpool City Council Campbelltown City Council	 1300 36 2170 (02) 4645 4000
Liverpool Public Health Unit (South Western Sydney Local Health District). NSW Ministry of Health	(02) 8738 6000 (02) 9391 9000
SafeWork NSW	13 10 50
Fire and Rescue NSW - Liverpool	(02) 9824 0521

Table 12: Details for key Contacts personnel

Role	Company	Name	Telephone	Email
Principal	[redacted]			
Project Manager				
Environmental Manager				
Project Manager				
Principal Contractor				
Principal Contractor				
Principal Contractor				
Project Manager				
Principal Contractor				

8 Inspection, Monitoring and Auditing

8.1 Inspections

8.1.1 The PC must inspect the scheduled activities covered by the EPL in accordance with the CEMP and LTEMP.

8.2 Environmental Monitoring

8.2.1 The PC must monitor the scheduled activities covered by the EPL in accordance with the CEMP and LTEMP.

8.3 Testing

8.3.1 The testing of this PIRMP is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.

8.3.2 This PC must test the PIRMP at least once every 12 months or within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

8.3.3 The PC must cover all components of the plan, including the effectiveness of training by means of desktop simulations and practical exercises or drills when testing the plan.

8.3.4 The PC must record the dates on which the plan has been tested and the name of the staff members who carried out the testing.

8.4 Auditing

8.4.1 This section defines the proposed means of auditing the PIRMP for pollutant incidents arising from the activity of crushing, grinding, and separating.

8.4.2 Upon issue of the PIRMPs to the PC, any requirements not already specified in the PIRMPs will be added.

8.4.3 Compliance of the PIRMPs will be audited as follows:

- Internal audits –the PC will carry out an audit on a minimum 6-monthly basis.
- External audits - will be undertaken by an independent environmental auditor in accordance with ISO 19011:2014 – Guidelines for Quality and/or Environmental Management Systems Auditing, as required.

9 Review and Improvement of the PIRMP

9.1 Plan updates

9.1.1 Updates of this plan will be produced to ensure continual improvement is achieved.

9.1.2 In accordance with the Environmental guidelines: Preparation of pollution incident response management plans (2012), this plan will be updated annually. However, updates will be issued after any major pollution incident takes place.

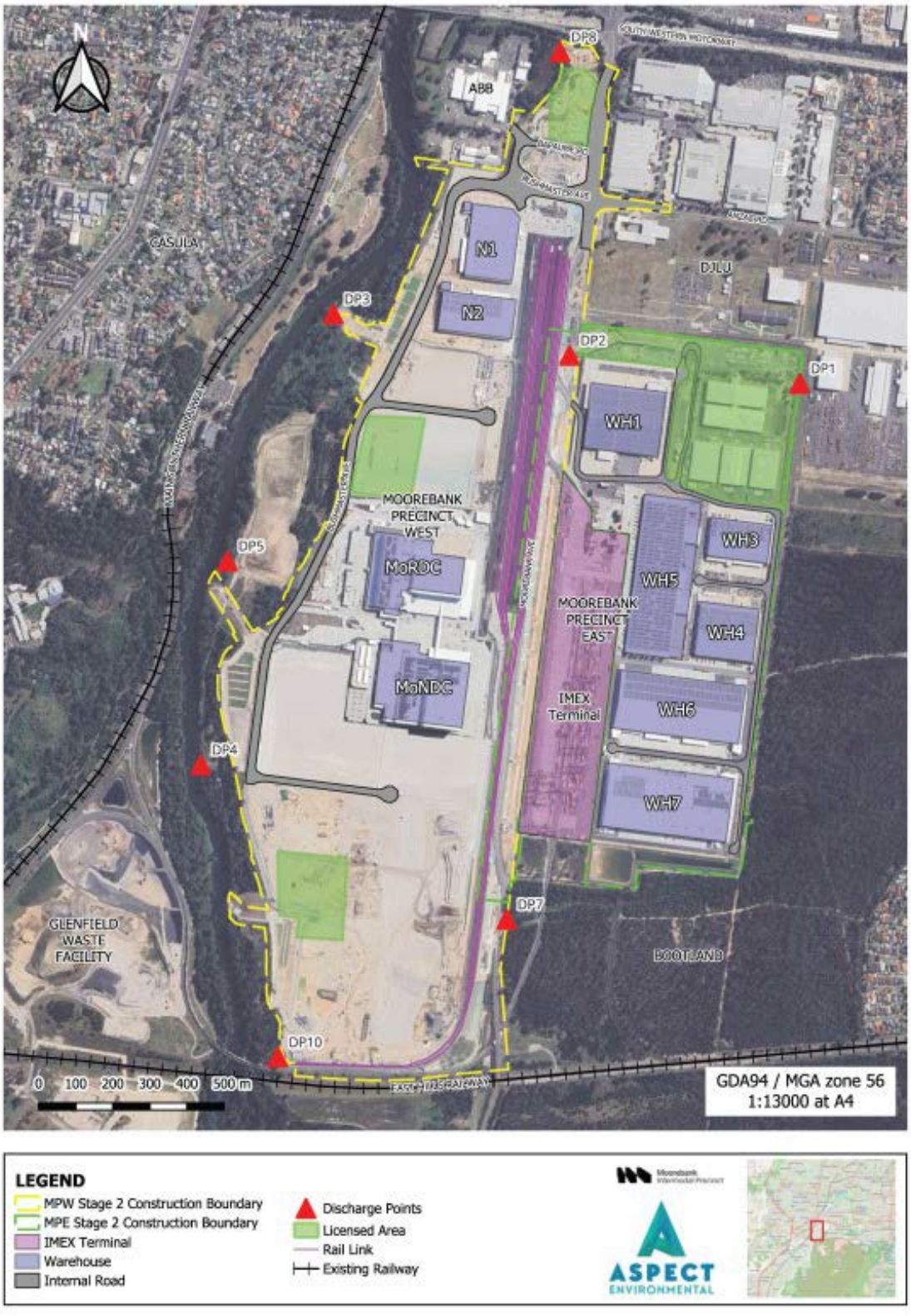
9.1.3 Any improvements identified during the review will be included in an updated version of the plan.

9.1.4 Plans must include the dates on which they are updated. When this PIRMP is updated, the most recent version of the document will supersede the previous version(s).

9.1.5 Obsolete documents will be suitably identified and removed from all points of issue and points of use.

9.1.6 Revisions of the Plan will be updated to the Development website. Project Managers and Principal Contractors will be advised via email.

Appendix A - Moorebank Logistics Park EPL Premises Map



Appendix B - Moorebank Intermodal Precinct Incident Management Process

Incident Management Process

Revision: 5
Revision Date: 21 November 2024

Incident Event — Incident occurs on Principal Contractor's Site or in relation to the Principal Contractor Works

1

Notification Process

2

Reporting

Report Lodged within 'ESR Incident Report' < *5 Business Days

- **Incident Report** — Contractor provides incident report, including corrective actions to the Principal
- **Corrective Actions** — Contractor to report to Principal once correction actions closed out
- **Monthly Report** — Contractor to issue ALL Incident Reports in the Monthly Report within 8 Business Days following the end of the month. All individual incident reports must be uploaded into the **ESR Principal Contractor HSE Data** form.

Aconex → ESR WHS Portal

A — **ESR Critical Incident** or hospitalisation?
- Yes → **Immediately, soon as practicable Notify**
- No

B — Attention of media, Minister for Finance or Infrastructure, Local Members?
- Yes → Notify within **15 minutes** of accident/incident
- No

C — WHS or **Environmental *Notifiable Incident?**
- Yes → Notify within **4 hours** or accident/incident
- No

Aconex → **ESR WHS Portal**

Refer to Incident Notification Matrix

Monthly Report — Contractor to issue Final & all inclusive Incident report details via the ESR Incident Report (< 5 Business Days). All end of month WHS Data and Incident Reports must be submitted to the **ESR WHS Manager** by the 8th Business Days following the end of the month

Definitions:
ESR Critical Incident Definition: An incident which **permanently alters the future of an individual** (this includes fatality, quadriplegia/paraplegia, amputation, impaired back, disfigurement and psychological disturbance).
Inclusive of a **pollution incident**, which is an incident which causes or threatens material harm to the environment (and/or people). It includes a leak, spill or escape of a substance or circumstance in which this is likely to occur.
Notifiable Incident under NSW WHS legislation:
- a person dies
- a person experiences a serious injury or illness
- a potentially dangerous incident occurs.

Notifiable incident under EPA
A notifiable incident means a pollution incident that causes, or threatens to cause 'material harm' to human health or the environment.
Pollution incidents usually involve a leak or spill. They can also involve an unintended or unauthorised deposit, or an escape of a substance which results in pollution

Summary

*High Potential Near Miss with no injury defined as having the potential to cause temporary impairment of > 6 months (SafeWork)

**All ICAM's must be undertaken by a Competent Supervisor.

Incident	Severity Rating	Severity Level	Urgency to Notify	Investigation
• Report Only • Hazard Report • Near Miss	1	Insignificant	Within 5 Business Days.	As per LOGOS Incident Form
- FAI - MTI (out-patient) - Return to work injury	2	Minor	The following Business Day.	As per LOGOS Incident Form
- LTI - Partial impairment injury - MTI (in-patient)	3	Moderate	Same Day Notification.	**ICAM (or equiv.) Exception if not High Risk Work or Injury Impairment (Potential 2 weeks < 6 months)
- *High Potential Near Miss - Single fatality - Extensive injuries - Permanent disability	4	Major	Immediate Notification.	*ICAM (or equiv.)
Multiple fatalities	5	Critical	Immediate Notification.	*ICAM (or equiv.)

***Note –** A MTI (In-patient), **Lost Time Injury**, **Notifiable or High Potential incident** requires formal Investigation Report method (all High Risk Work)

ESR	QUBE	National Intermodal (NI)
ESR WHS Manager	QUBE WHS Manager	NI General Manager; General Manager - WHS

Aconex AND Email

- **ESR POST INCIDENT REPORTING** — Head of Moorebank, Group Head of WHS, Head of AUS/NZ
- **QUBE POST INCIDENT REPORTING** — WHS Manager, General Manager – Commercial/Terminals, Senior PM
- **NI POST INCIDENT REPORTING** — General Manager, General Manager - WHS

National Intermodal
Chief Executive Officer

ESR Key Contacts – Incident & Emergencies

NAME	COMPANY	POSITION	MOBILE	EMAIL
[redacted]	ESR	Senior Development Manager	[redacted]	[redacted]
	ESR	National Construction Manager		
	ESR	WHS Manager – Major Projects		
	ESR	Development Manager		
	ESR	Development Manager		
	ESR	Pjoject Manager		
	Tactical	Senior Project Manager – Roads		
	Knight Frank	Senior Facility Manager		
	PSI Corporate	Site Security (24/7 Patrol)		
		CCTV Monitoring Room		

10 CARAS Certified Systems

CARAS' proposed services will be delivered in accordance with our Integrated Management System (IMS), which is certified to comply with the International Organization for Standardisation (ISO) ISO 45001, ISO 9001 and ISO 14001.

Work Health and Safety

CARAS is committed to operate in accordance with the AS/NZ 45001 and industry best practices. We look to provide a positive safety culture which benefits CARAS employees and external stakeholders. CARAS strives to implement improvement strategies to maintain occupational health and safety and recognises the values of the return on this investment: a safer, healthier workplace, with increased productivity of the workforce while maintaining quality of products and efficiency in all aspects of job delivery.

Quality Assurance

The delivery of all of CARAS' services is managed through our integrated Quality Management System and this will apply for all works outlined in this proposal.

CARAS will undertake systematic internal review of all deliverables outlined in this fee proposal as a part of our quality assurance process.

Environmental Management

CARAS firmly believe that a successful future depends on the sustainability of the environment, communities and economies in which we operate and is strongly committed to working toward ensuring compliance with environmental laws and regulations and managing and minimising the environmental impacts of our operation and offerings.

11 CARAS Commitment to Sustainability

CARAS is committed to a sustainable future. We believe delivering better environments means committing to delivering projects that improve the places where we live and work. CARAS' commitment to sustainability is summarized below.

Carbon Neutral Business

CARAS is a registered **Climate Active Carbon Neutral** business. Climate Active is an Australian Government program that supports national climate policy by driving voluntary climate action by Australian businesses

5.5 Star Office Energy Nabers Rating

NABERS (National Australian Built Environment Rating System) provides simple, reliable, and comparable sustainability measurement you can trust across building sectors like hotels, shopping centres, apartments, offices, data centres, and more. Following our self-managed office fit-out, CARAS's **NABERS office energy efficiency rating is 5.5 out of 6 Stars**, with a 5.97 out of 6 Star equivalency rating.

100% Renewable Energy

CARAS is certified as using 100% renewable energy as noted by the NABERS Renewable Energy Indicator which displays the proportion of the building's energy that comes from on-site renewable energy generated, as well as off-site renewable energy procured.

City of Sydney's Cityswitch Business Partner

CARAS is proud to a be a committed signatory of City of Sydney's City Switch Program. The City of Sydney has set an ambitious target for our local area emissions and are aiming for net zero by 2035. CitySwitch demonstrate the commitment from the business community to act by reducing waste and energy usage, switching to renewables, and greening supply chains.

Sustainability Reporting

CARAS's sustainability action plan and **reporting processes are in accordance with the Global Reporting Initiative (GRI) Standards**, the most widely used sustainability reporting standards globally. This means we can easily align with our clients reporting obligations.

End

CARAS

Construction and Remediation Advisory Services (CARAS)

e info@caras.com.au
p 02 9929 2362
w caras.com.au

Head Office
Level 2/ 63 Foveaux St
Surry Hills NSW 2010