Department of Planning, Housing & Infrastructure

Our ref: SSD-7424-PA-13

Mr Allan Young
National Technical Leader, Urban and Regional Planning
Roussakis Holdings Pty Ltd
20 Chandos Street
St Leonards, Sydney
NSW, 2065

4 October 2024

Subject: Smeaton Grange Waste Facility - Construction Environmental Management Plan

Dear Mr Young

I refer to your submission of the Construction Environmental Management Plan (CEMP) in accordance with Conditions C1 and C2 of Schedule C of the SSD-7424 consent for the Smeaton Grange Waste Facility (SSD-7424).

The Department has carefully reviewed the CEMP and the associated sub-plans and is satisfied it meets the requirements of the relevant conditions of SSD-7424. Accordingly, as nominee of the Planning Secretary, I approve the following plans:

- Smeaton Grange Waste Facility, Construction Environmental Management Plan (CEMP), Version 1 prepared by EMM Consulting Pty Ltd and dated September 2024 (Condition C1)
- Construction Noise and Vibration Management Plan, Version 2, prepared by EMM Consulting Pty Ltd and dated September 2024 (Condition B3)
- Erosion and Sediment Control Plan, CPESC 7811 Review - 12 September 2024 (Condition B26)

You are reminded that if there are any inconsistencies between the CEMP and the conditions of approval, the conditions prevail.

Please ensure you make the document publicly available on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Penny White on (02) 8289 6410 or at penny.white@planning.nsw.gov.au

Yours sincerely

Pamela Morales
Acting Team Leader
Industry Assessments

As nominee of the Planning Secretary

Construction Environmental Management Plan

Smeaton Grange Waste Recycling and Transfer Facility - 52 Anderson Road, Smeaton Grange

Prepared for Roussakis Holdings Pty Ltd

September 2024

Construction Environmental Management Plan

Smeaton Grange Waste Recycling and Transfer Facility - 52 Anderson Road, Smeaton Grange

Roussakis Holdings Pty Ltd

E231336 RP7

September 2024

Version	Date	Prepared by	Reviewed by	Comments
V1	12 September 2024	Samantha Hayes	David Bone	Final

Approved by

David Bone
Associate Director
12 September 2024

Ground floor 20 Chandos Street
St Leonards NSW 2065
ABN: 28 141 736 558

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1 Introduction

1.1 Project overview

Roussakis Holdings Pty Ltd (Roussakis Holdings) is developing a waste recycling and transfer facility (the facility) at 52 Anderson Road, Smeaton Grange (the site) in the Camden local government area (LGA) (the project). The facility will process up to 140,000 tonnes per annum (tpa) of non-putrescible waste including building and demolition waste, selected commercial and industrial waste, soils, vegetation, virgin natural excavated material, excavated natural material, rail ballast and spoil. Site location, boundaries and indicative site layout are shown in Figure 1.1 and further described in Section 2.

This Construction Environmental Management Plan (CEMP) has been developed to meet the requirements of Condition C1 of development consent SSD 7424 (as modified by MOD 3). The CEMP applies to site establishment and construction activities of the project.

Unless specifically noted otherwise, references to plans and consent conditions for SSD 7424 in this document and Appendix documents mean SSD 7424 (as modified by MOD 3).

Construction activities associated with the project will include fencing, concrete/asphalt works (e.g. internal roads, yard, parking area, perimeter curb), construction of the waste transfer holding shed (the shed), waste stockpiling areas, weighbridges, wheel-washes, a surface water management system, sprinkling site irrigation system, installation of offices and amenities, and landscaping.

Minor ground disturbance and excavation is anticipated, which will involve the installation of anchors for the lunch room and amenities, footings for fencing, and a 2 metre (m) deep sedimentation basin. The site has existing utilities and stormwater connections.

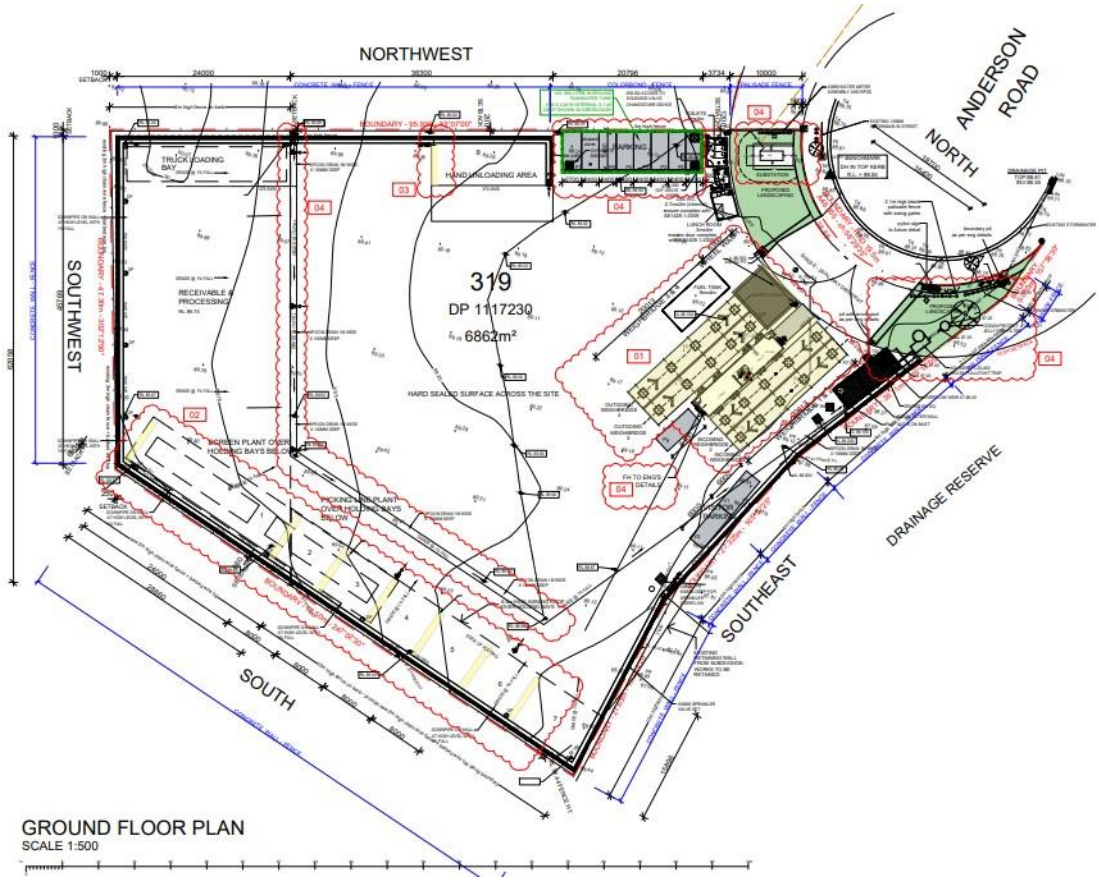

Figure 1.1 Site layout

1.2 CEMP scope and purpose

The CEMP has been developed to:

- describe the environmental management systems and practices to be implemented by Roussakis Holdings employees and contractors during the construction phase of the project
- provide an overarching framework for the construction works; by outlining the steps for taking a structural approach to the management of on-site environmental aspects and risks during the construction phase
- set out clear roles and responsibilities for management and operational personnel, and outlines the inductions and training, requirements, management procedures and measures, that direct all on-site personnel
- describe how Roussakis Holdings will implement monitoring programs and manage potential environmental impacts of the project during construction; and in accordance with applicable legislative requirements, external approvals and associated conditions of approval.

1.3 CEMP framework and approval

The CEMP provides the link between planning and execution of construction activities. The CEMP will ensure that approval conditions under SSD 7424 and obligations under applicable legislative requirements are transferred into clear and practical action. The conditions of consent and where they are addressed in the CEMP are outlined in Section 3.1.3. Relevant legislative requirements are outlined in Section 3.

The CEMP will be submitted for approval to the NSW Department of Planning, Housing and Infrastructure (DPHI) Secretary prior to the commencement of construction, and revised and approved, as required.

It will take effect prior to the commencement of site establishment and construction activities.

1.4 Project environmental assessment and approval overview

On 22 December 2017, the then Planning and Assessment Commission of NSW (now known as the Independent Planning Commission) granted the original development consent SSD 7424 on behalf of DPHI for the construction and operation of the facility.

On 10 September 2018, DPHI approved the modification of SSD 7424 (MOD 1). The modification related to a reorientation of the front fence and gate, removal of an approval requirement for the front fence by Council and allowed site security fencing at the south and south-west boundaries of the site.

A second modification (MOD 2) to SSD 7424 was approved on 12 December 2023 for a design change to install concrete walls instead of metal and increase height and altered the fall for the roof over the holding bays and picking line.

On 1 August 2024, a third modification (MOD 3) was approved for the repositioning of the weighbridges, wheel wash and office, amendments to the stormwater management system, and changes to construction materials and design of the site boundary walls.

The initial environmental impact statement (EIS) for the project was sought under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as a state significant development (SSD) in June 2018. The EIS was prepared in accordance with Secretary's environmental assessment requirements Clauses 71 and 72 of the Environmental Planning and Assessment Regulation 2000 (EP&AR) and advice provided by Camden Council (Council) following a pre-development application meeting.

The EIS was placed on exhibition for seven weeks from 14 July 2016 to 26 August 2016, and subsequently a Response to Submissions (RTS) report was prepared to respond to the 162 community, various NSW government agencies, Council and non-government organisation, submissions received.

Potential environmental impacts and control measures outlined in the EIS, RTS and Appendix B1 of SSD 7424 (Management and Mitigation Measures) have been taken into consideration and incorporated into this CEMP.

1.5 Project schedule

Site establishment and construction works associated with MOD 3, and pending approval of the CEMP by DPHI, are anticipated to commence in August/September 2024 and last between 6 to 8 weeks. An indicative program is provided in Table 1.1, and a further breakdown of construction activities is outlined in Section 2.3.

Table 1.1 Indicative project schedule

Activity	2024							
Week (Wk)	**Wk 1**	**Wk 2**	**Wk 3**	**Wk 4**	**Wk 5**	**Wk 6**	**Wk 7**	**Wk 8**
Stage 1								
• Site establishment • Site preparation and minor earthworks • Acoustic fencing • Relocation and/or protection of services	**X**	**X**						
Stage 2								
• Surface water management system • Concrete/asphalt works • Shed and amenities • Utilities		**X**	**X**	**X**	**X**			
Stage 3								
• Construction of structures and purpose built areas • Finishing works and landscaping • Site security fencing				**X**	**X**	**X**	**X**	**X**

2 Project overview

2.1 Project description

The project is located at 52 Anderson Road, Smeaton Grange, legally described as Lot 319 DP 1117230. The site comprises of 6,862 square metres (m^2) of flat terrain and is situated within a large industrial estate referred to as the Smeaton Grange Industrial Estate (estate).

The project will import inert general solid waste (non-putrescible) such as construction and demolition wastes, and selected commercial and industrial wastes, for processing (e.g. screening and sorting) to produce saleable recycled materials. The recycled materials produced will include soils, metals and dry paper/cupboard. These products will meet recycled material specifications while recovering a range of materials that would otherwise be disposed to landfill.

No special liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined in the NSW *Protection of the Environment Operations Act* 1997 (POEO Act) and EPA (2014), would be accepted at the facility. All of the materials brought onto the site will be taken from the site as products or as rejects for disposal at an EPA licensed landfill. There would be no materials land-filled or otherwise disposed of anywhere within the site as a result of the activities undertaken on-site.

Construction activities will involve site establishment, minor excavation, ground disturbance and foundation works for the site components identified in the following table. Key elements of the project are summarised in Table 2.1.

Table 2.1 Key project elements

Project element	Project description
Maximum processing rate	140,000 tonnes of waste per annum.
Site components	• waste transfer holding shed which will contain the majority of waste processing activities and some stockpiles • segregated heavy waste (timber, bark/concrete and metal) and stockpiling area in bins also along the southern boundary • yard, storage and parking area • weighbridge area with four weighbridges (2 x inbound, 2 x outbound), wheel-washes for the two outbound traffic lanes, offices and amenities • electrical substation • surface water management system • acoustic and site security fencing • sprinkling site irrigation system to minimise airborne dust • general use area, including internal roads. The entire site would be sealed (asphalt or concrete) with a permitter curb.
Hours of construction	• 7:00 am to 6:00 pm, Monday to Friday • 8:00 am to 1:00 pm, Saturday • no works to be undertaken on Sundays to public holidays. Activities outside standard construction hours may be permitted where there is a safety requirement or emergency work needs to be undertaken.

Project element	Project description
Hours of operation	Accept waste deliveries and dispatch materials: • 6:00 am to 10:00 pm, Monday to Friday • 6:00 am to 5:00 pm, Saturday • 8:00 am to 4:00 pm on Sunday. Waste processing: • 7:00 am to 6:00 pm, Monday to Saturday when there is sufficient demand but normally 7:00 am to 4:00 pm • there will be no processing on Sundays or public holidays.
Transport and access during the construction phase	• access will be via the cul-de-sac at the end of Anderson Road • all work vehicles will be parked within the site. There will be an average of about 40 vehicle movements (i.e. 20 trips) daily, comprised of 10 light vehicle and 10 heavy vehicle movements for all site construction activities during the construction period (including materials dispatch, waste removal, project managers and contractors).

Source: Smeaton Grange Waste Recycling and Transfer Facility EIS (1 June 2016) with amendments incorporated from the Smeaton Grange Response to Submissions (10 January 2017).

2.2 Project setting

The site has been cleared and slightly filled and shaped with clay. There are trees immediately outside the north-eastern boundary which belong to the adjacent Kenny Creek riparian corridor.

The site is ideally suited for the development of a waste recycling and transfer facility because it is zoned IN1 General Industrial pursuant to the *Camden Local Environmental Plan 2010* (Camden LEP) and centrally located in the Narellan area. It is surrounded by industrial land uses to the north, south and west.

The site is readily accessible to light and heavy vehicles and is situated at the end of a cul-de-sac (Anderson Road) which provides the only access to the site.

The nearest residences are approximately 120 m to the south-east on Linton Road and Chapman Circuit. Both streets are situated in the suburb of Currans Hill. The streets are low density residential zoned land located beyond an embankment which acts as an environmental buffer between the industrial and residential zones.

With the exception of the vegetation corridor along Kenny Creek, there are no public recreation areas within the vicinity of the facility. There are no community services such as schools that are closer to the facility than the residences to the south-east. Given that no material impacts are predicted at these residences, no impacts are predicted at any other location.

The vegetation corridor along Kenny Creek close to the site has industrial development to the north and south and is not believed to be widely used as a community recreation area. It will not be materially impacted by the facility. Any children playing in the corridor would not be able to enter the site from the corridor due to the fences along the site's eastern boundary.

The site has existing utilities and stormwater connections.

2.3 Construction works and staging

In accordance with Condition C1(e) of SSD 7424, Table 2.2 outlines all actives to be undertaken on-site during the construction of the project including a clear indication of construction stages.

Table 2.2 Construction activities and staging

Activity	Details
Stage 1	
Site establishment	• fencing off the road corridor • installation of initial environmental controls including public safety signage • establishment of construction site facilities and access • implementation of adequate signage.
Site preparation and minor earthworks	• although the site has mostly been cleared, further clearing and landscaping will be undertaken where necessary • deployment of site sediment and erosion controls and pollution management measures in accordance with the Water Management Plan (WMP) • minor ground disturbance including installation of footings for fence • installation of side and rear fencing/acoustic fencing as per Appendix D • temporary front entrance gate will be in place until permanent structures are installed at a later construction stage • stripping and stockpiling of topsoil where required, for reuse. Management of topsoil will be in accordance with the WMP, within the 'Temporary sediment stockpile' area of the Erosion and Sediment Control Plan (Appendix C) • establishment of temporary stockpile areas for road base constituents, stripped topsoil, pre-cast concrete materials and other materials to be used during the construction phase • deployment of temporary traffic control devices (Section 5.6.1) • construction of on-site access routes.
Relocation and/or protection of services	• the site has existing utilities, however consultation with relevant service providers will take place should services require relocation (i.e. electricity, gas, water and telecommunications infrastructure).
Stage 2	
Surface water management system	• preparation of construction diversion drains • construction of on-site drainage structures including a temporary sediment basin until a more permanent structure can be implemented in the north-eastern corner of the site.
Shed and amenities	• laying down a concrete slab for the shed • construction of shed and amenities.
Concrete/asphalt works	• hard surfacing of the site in a material such as concrete or bitumen, with a perimeter curb • construction of different pavement layers on-site • marking eight on-site parking spaces for staff and two on-site visitor parking spaces located within the front setback.
Utilities	• connection to services.

Activity	Details
Stage 3	
Construction of structures and purpose built areas	Construction and/or installation of structures and facilities including: • a weighbridge area with four weighbridges, and wheel wash for outbound vehicles • a weighbridge office • seven product bays, which will be 4 m high and block walled • amenities building • a sprinkling site irrigation system to minimise airborne dust • drainage system including pollutant trap • an enclosed picking line inside the main shed • installation of front security fencing (2.1 m fence as per Appendix D) • waste/product stockpiles • out-of-hours bin storage and waste truck parking.
Finishing works and landscaping	• removal of any temporary works • installation of lighting, safety barriers, site security fencing, line markings, safety signage around the site • progressive rehabilitation, restoration and landscaping of disturbed/temporary areas • site clean-up and disposal of all surplus waste construction materials.

Construction activities will also involve:

- road delivers of equipment and materials to be used in the construction process
- Council or contractor pickup of waste accumulated during the construction process (i.e. rubbish from employee lunches, green waste, and construction waste).

All construction works will be wholly contained within the existing boundaries of the site.

3 Legislative and other requirements

3.1 Statutory requirements

Key applicable legislation relevant to the project includes, but is not limited to:

- Commonwealth legislation:
  - *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
- State legislation:
  - EP&A Act
  - EP&A Regulation
  - POEO Act
  - *Water Management Act 2000* (WM Act)
  - *Contaminated Land Management Act 1997* (CLM Act)
  - *Rural Fires Act 1997*.

After reviewing the EIS, the then Office of Environment and Heritage (OEH) (now Biodiversity Conservation Division (Ecology) and Heritage NSW (Heritage)) Greater Sydney Planning Team has concluded that the project does not contain biodiversity, natural hazards and Aboriginal Cultural Heritage issues that require a formal OEH response. Thus, Biodiversity Conservation Division (BCD) will not be involved in any further assessment of the project (refer to Appendix B, Smeaton Grange EIS 2016). However, an unexpected finds protocol for heritage items is still requirement under Condition C1(d) of SSD 7424. The protocol is included in Section 5.5. The legislation and guidelines for managing of unexpected heritage finds includes the EP&A Act, and the following:

- *National Parks and Wildlife Act 1974* (NPW Act)
- *Heritage Act 1997* (Heritage Act).

3.1.1 Approvals, permits and licences

As outlined in Section 1.3 of this CEMP, the project has been determined under Part 4 of the EP&A Act, with the granting of development consent SSD 7424, which forms the basis for outlining necessary conditions and measures to be included in this CEMP.

The project will also be regulated by an Environment Protection Licence (EPL) issued under section 48 of POEO Act. Therefore, there are no provisions provided to creating pollution of any type during the planning or execution of the construction work. Under the POEO Act, the following personnel have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- the person carrying out the activity
- an employee or agent carrying out the activity
- an employer carrying on the activity
- the occupier of the premises where the incident occurred.

Notifications must be given immediately in accordance with project approved communications protocols, after the person becomes aware of the incident (see Section 4.3). Only persons engaged in the activity resulting in the pollution incident, and occupiers of the land where the incident occurred, have a duty to report the incident.

3.1.2 Compliance policies, standards and guidelines

Environmental aspects and mitigation measures during the construction phase will be undertaken in accordance with the following policies, standards and guidelines:

i Noise

- NSW Department of Environment and Climate Change (DECC) 2009*, Interim Construction Noise Guideline* (ICNG)
- NSW Department of Environment and Conservation (DEC) 2006*, Assessing Vibration: a technical guideline*
- German Institute for Standardisation (Deutsches Institut für Normung) 2016, *DIN 4150-3 (2016-12) Vibration in Buildings – Part 3: Effects on Structures*
- Standards Australia 2010, *AS 2436-2010 (R2016) Guide to Noise Control on Construction, Maintenance and Demolition Sites.*

ii Surface water, sediment and erosion control

- Engineers Australia 2016, *Australian Rainfall and Runoff Guidelines*
- Environment Protection Authority (EPA) 1997, *Managing Urban Stormwater: Council Handbook*
- Landcom 2004, *Managing Urban Stormwater: Soils and Construction – Volume 1* (Blue Book)
- Camden Council 2014, *Water Sensitive Urban Design (WSUD) Guidelines.*

iii Hazards and risk – Dangerous goods, bunding, spills and leaks

- National Transport Commission 2022, *Australian Dangerous Goods Code*
- Department of Planning 2011, *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33*
- EPA 1997, *Environment Protection Manual for Authorised Officers: Bunding and Spill management, technical bulletin*
- EPA 2007, *Storing and Handling Liquids: Environmental Protection – Participants Manual*
- other relevant Australian Standards.

iv Contamination and waste

- Safework NSW 2022, *Safework NSW Code of Practice: How to Manage and Control Asbestos in the Workplace*
- EPA 2014, *Waste Classification Guidelines – Part 1: Classification of Waste*.

v Bushfire

- NSW Rural Fire Service 2019, *Planning for Bushfire Protection*.

Previous and ongoing consultation with the Council, DPHI, EPA, Heritage NSW, Department of Climate Change, Energy, the Environment and Water (DCCEEW), Transport for NSW (TfNSW) and other government agencies as required, will also continue to inform management and control measures during the construction phase of the project.

3.1.3 Development consent conditions

The requirements for the CEMP are stated under Condition C1 of SSD 7424. Conditions requiring inclusion in the CEMP are listed in Table 3.1.

Table 3.1 Development consent SSD 7424 conditions relevant to CEMP

Condition number	Condition description	Relevant section of report or other document
Part A	**Obligation to minimise harm to the environment**	
A1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the Development.	Chapter 5
Part A	**Terms of the consent**	
A2	The Development may only be carried out in:	
	a) in compliance with the conditions of this consent	Section 3.1.1 Section 3.1.3
	b) in accordance with the directions of the Planning Secretary	Section 1.3 Section 1.4
	c) in accordance with the EIS and RTS	Section 1.4
	d) in accordance with Modification Assessments	Section 1.4
	e) in accordance with development layout plans in Appendix A (December 2023)	-
	f) in accordance with the Management and Mitigation Measures (see Appendix B).	Chapter 5
Part A	**Protection of public infrastructure**	
A21	Prior to the commencement of construction, the Applicant must:	
	a) consult with the relevant owner and/or provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure	Section 4.3.2
	b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths).	Section 4.4.2
Part A	**Compliance**	
A23	The Applicant must ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	Section 4.2
Part A	**Operation of plant and equipment**	
A26	The Applicant must ensure that all plant and equipment used for the Development is:	Section 5.1.3
	a) Maintained in a proper and efficient condition	Section 5.3.3
	b) operated in a proper and efficient manner.	Section 5.4.1

Condition number	Condition description	Relevant section of report or other document
Part B	**Construction Noise Management Plan**	
B3	Prior to the commencement of construction, the Applicant must prepare a Construction Noise and Vibration Management Plan (CNVMP) for the development to manage high noise generating works to the satisfaction of the Secretary. The CNVMP shall form part of the CEMP required by Condition C1 and must:	Appendix B
	a) be prepared by a suitably qualified and experienced noise expert	
	b) be approved by the Secretary prior to the commencement of construction of the Development	
	c) describe the management and mitigation measures and procedures for achieving the noise management levels in the EPA's Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009)	
	d) identify high emission generating construction activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities	
	e) include strategies that have been developed with the community for managing high noise generating works	
	f) describe the community consultation undertaken to develop the strategies in (e) above	
	g) include a complaints management system that would be implemented for the duration of the Development.	
B4	The Applicant must:	
	a) not commence construction until the CNVMP required by Condition B3 is approved by the Secretary	
	b) the Applicant must ensure the CNVMP (as required and approved by the Secretary from time to time) is implemented during construction of the Development.	
Part B	**Acoustic Fencing**	
B6	The Applicant must construct the fencing shown in Appendix A prior to the commencement of construction of any part of the Development.	Section 2.3 Section 5.1.3
B7	To ensure the external appearance of the development is suitable and contributes to the visual character of the surrounding area, the boundary fencing shall be of a visually attractive material and colour that has been agreed to by the Secretary.	Section 5.7
B8	Detailed drawings and further details of the boundary fencing shown in Appendix A shall be submitted to and be approved in writing by the Planning Secretary prior to the commencement of construction of any part of the Development. The detail thereby approved must be carried out in accordance with that approval.	Section 5.1.3 Appendix D
Part B	**Road and Traffic Noise**	
B12	Prior to commencement of construction, the Applicant must prepare a Driver Code of Conduct and induction training for the Development to minimise road traffic noise. The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the Development.	Section 4.3.3 Appendix A
Part B	**Vibration Criteria**	
B14	Vibration caused by construction at any residence or structure outside the site must be limited to:	Appendix B
	a) for structural damage, German Standard DIN 4150 Part 3 Structural Vibration in Buildings. Effects on Structures	
	b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (Department of Environment and Conservation, 2006).	

Condition number	Condition description	Relevant section of report or other document
B15	The vibration limits in Condition B14 apply unless an alternative is outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by Condition C1 of this consent.	
Part B	**Air Quality**	
B22	During construction, the Applicant must ensure that:	Section 5.3.3
	a) exposed surfaces and stockpiles are suppressed by regular watering	
	b) all trucks entering or leaving the site with loads have their loads covered	
	c) trucks associated with the Development do not track dirt onto the public road network	
	d) public roads used by these trucks are kept clean.	
Part B	**Soils, water quality and hydrology**	
B26	Prior to the commencement of construction, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater and Construction Guideline and the Erosion and Sediment Control Plan included in the CEMP required by Condition C1.	Section 3.1.2 Section 5.2.3 Appendix C
B34	The Applicant must:	Appendix C
	a) not commence construction until the WMP required by Condition B33 is approved by the Secretary	
	b) the Applicant must ensure the WMP (as required and approved by the Secretary from time to time) is implemented for the life of the Development.	
B35	In the event that groundwater is intersected during construction the Applicant shall:	Section 5.2.3
	a) obtain the necessary water licences or approvals from CL&W	
	b) develop a Groundwater Management Plan for the testing, dewatering, storage, movement and treatment of any groundwater to the satisfaction of the CL&W.	
B36	Prior to the commencement of construction, the Applicant must undertake a soil salinity verification study at the site in consultation with Council.	Section 4.4.2
Part B	**Hazards and risk – Dangerous goods and Bunding**	
B37	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 t all times.	Section 3.1.2 Section 5.10.1
B38	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with:	
	a) all relevant Australian Standards	
	b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund	
	c) the Environment Protection Manual for Authorised Officers: Bunding and Spill management, technical bulletin (EPA 1997).	
	In the event of an inconsistency between the requirements listed from (a) to (c) above, the most stringent requirements must prevail to the extent of the inconsistency.	
B39	The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or the EPA's Storing and Handling Liquids: Environmental Protection – Participants Handbook.	

Condition number	Condition description	Relevant section of report or other document
B40	**Fire Safety**	
B40	The fire hydrant system must be installed in accordance with BCA Clause E1.3 (buildings and open yard). The system shall comply with AS2419. 1:2005 except that the minimum flow rate shall be 50 L/s in lieu of that detailed in Table 2.1.	Section 4.4.2 Section 5.11
B41	The final design of the fire hydrant system must be prepared by a suitably qualified fire services engineer and submitted to the Principal Certifying Authority prior to issue of the Construction Certificate.	Section 4.4.2 Section 5.11
B42	To provide for the storage and collection of contaminated fire water. 180 m^3 of storage is to be provided on the site. A design prepared by a suitably qualified engineer is to be submitted to the Principal Certifying Authority prior to issue of the Construction Certificate.	Section 4.4.2 Section5.2.3
Part B	**Waste Management**	
B44	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.	Section 5.8.1
B49	The Applicant shall ensure any waste generated on the site during construction is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version and, disposed of to a facility that may lawfully accept the waste.	
PART C	**Construction Environmental Management Plan**	
C1	The Applicant must prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Planning Secretary. The CEMP must:	Section 1.3 Section 1.4
	a) be approved by the Planning Secretary prior to the commencement of construction	Section 1.4
	b) identify the statutory approvals that apply to the Development	Section 3
	c) outline all environmental management practices and procedures to be followed during construction works associated with the Development	Chapter 5
	d) include an unexpected finds protocol for heritage items and contaminated material	Section 5.5 Section 5.9
	e) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages	Section 2.3
	f) detail how the environmental performances of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts	Section 6.3
	g) incorporate measures to reduce energy consumption	Section 5.12
	h) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development	Section 4.1
	i) include the management plans required under Condition C2 of this consent.	Appendix B Appendix C
C2	As part of the CEMP required under Condition C1 of this consent, the Applicant must include the following:	
	a) a Construction Noise and Vibration Management Plan (see Condition B3)	Section 5.1 Appendix B
	b) an Erosion and Sediment Control Plan (see Condition B26).	Appendix C
C3	The Applicant must:	
	a) not commence construction of the Development until the CEMP is approved by the Planning Secretary	Section 1.3

Condition number	Condition description	Relevant section of report or other document
	b) carry out the construction of the Development in accordance with the CEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time)	Section 1.2 Section 1.3
PART C	**Management Plan Requirements**	
C7	Within three months of: a) approval of a modification c) submission of an incident report under Condition C9 the applicant must review, and if necessary revise, the strategies, plans and programs required under this consent to the satisfactory of the Planning Secretary.	Section 4.4.1
PART C	**Reporting**	
C9	Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report must be supplied to the Department outlining the basic facts. A further detailed report must be prepared and submitted following investigations of the causes and identification of necessary additional preventative measures. That report must be submitted to the Planning Secretary no later than 14 days after the incident or potential incident.	Section 7.2
C10	The Applicant must maintain a register of accidents, incidents and potential incidents. The register must be made available for inspection at any time by the independent Hazard Auditor and the Department.	Section 7.2
PART C	**Access to Information**	
C14	Prior to the commencement of construction and for the duration of the Development, the Applicant must: (a) make copies of the following publicly available on its website: i) the documents referred to in Condition A2 ii) all current statutory approvals for the development iii) all approved strategies, plans and programs required under the conditions of this consent v) a complaints register updated on a quarterly basis.	Section 4.3.3

4 Implementation and operation

4.1 Environmental roles and responsibilities

The facility has established roles and responsibilities for personnel to implement the requirements of this CEMP.

4.1.1 Project manager

During the construction phase of the project, the project manager is responsible for the following:

- ensures that adequate resources are provided to implement the requirements of this CEMP and to meet all legislative and contract requirements for environmental management
- directs and supports the project team operations consistent with the requirements in this CEMP
- conducts fortnightly reviews with key project personnel to ensure the project environmental systems and procedures are adequately implemented
- ensures that all contractor agreements issued to contractors and suppliers comply with the requirements of this CEMP.

4.1.2 Site manager

During the construction phase of the project, the site manager is responsible for the following:

- ensures that this CEMP is implemented
- reports any deficiencies and shortcomings of the CEMP, regularly reviewing and improving the outlined practices
- check mitigation measures and monitoring programs on a fortnightly basis to make sure they are compliant and effective
- reviews Safe Work Method Statements (SWMS) or equivalent to ensure that environmental planning has been addressed and documented to an appropriate level
- adequately reports on any on-site incidents that may occur during the construction phase through various internal and external channels
- manages and organises contractors involved in the construction of the project, maintenance and repair work.

4.1.3 Environmental representative

During the construction phase of the project, the environmental representative is responsible for the following:

- the main point of contact for advice in relation to the on-site environmental performance during construction activities
- considers and advises the project manager and site manager about conditions of approval, other licences and approvals related to the environmental performance and impacts of the project
- monitors the implementation of this CEMP and other relevant environmental management plans and monitoring programs required under SSD 7424

- reports any deficiencies and shortcomings of the CEMP, regularly reviewing and improving the outlined practices
- regularly checks mitigation measures and ensures that regular environmental auditing is undertaken in accordance with Section 6.3 this CEMP
- ensures the records of planned environmental control measures are kept on site as required
- adequately reports on any on-site incidents that may occur during the construction phase through various internal and external channels
- is available to respond to any community concerns or complaints related to environmental performance during the construction phase of the project
- is involved in reviewing this CEMP and other management plans prior to submission to the Secretary.

4.1.4 Safety advisor

During the construction phase, the occupational health and safety advisor is responsible for:

- taking part in the incident response and investigation processes, which are related to occupational health and safety
- recommending actions on incident data and trends, as required
- contacting Emergency Services (ambulance, fire brigade or police), when required
- preserving the incident scene
- coordinating help where needed at the incident response.

4.1.5 All employees and contractors on-site

During the construction phase of the project, all employees and contractors have the following responsibilities:

- comply with CEMP and environmental legislation, rules and guidelines
- follow instructions from supervisor, foreman or leading hand as appropriate
- work with regard to the environment, not cause damage or adverse environmental impacts
- report environmental incidents immediately to site manager.

4.1.6 Engineering manager

The engineering manager's responsibilities prior to and during the construction phase will involve:

- ensures that the detailed design of the project is consistent with the approved and desirable environmental outcomes
- liaises with the environmental representative as required to ensure that environmental aspects and constraints of the project have been appropriately considered in the design.

4.1.7 Environmental specialists

Consultants will be commissioned by Roussakis Holdings, as required, to provide technical input and advice on environmental matters. Consultants will also undertake surveys, inspections, implement monitoring programs or prepare environmental assessments and reports, as required.

4.2 Training and awareness

4.2.1 Site inductions

All employees and contractors must undertake a compulsory site induction that includes an environmental component prior to commencement of any work on-site. The induction is compulsory to ensure all personnel involved in the construction of the project have an awareness of the requirements of the CEMP, and know how to implement adequate environmental management measures.

Short-term visitors to the site for purposes such as deliveries will not be inducted but will be accompanied by inducted personnel at all times.

The induction will cover:

- familiarisation with the CEMP
- key on-site environmental issues, such as dust and noise management
- relevant conditions of environmental licences, permits and approvals
- specific environmental management requirements and responsibilities of everyone that works on-site
- environmental controls and mitigation measures implemented on site to manage environmental issues
- incident response and reporting requirements
- information relating to the location of environmental constrains.

4.2.2 Pre-start meetings / Toolbox talks

Roussakis Holdings site manager will implement a program of toolbox talks or pre-start meetings for all personnel for the duration of the construction works. Toolbox talks are an important part of raising awareness and educating personnel on issues related to all aspects of construction including safety, quality and environmental issues.

These will be scheduled on a regular basis, and no less than once a fortnight for all on-site personnel. The toolbox talks will encourage information sharing and participation of all on-site personnel, making sure that environmental awareness and continuous improvement continues throughout the construction phase of the project.

Topics to be covered will be determined by Roussakis Holdings and will include, but are not limited to:

- limits of work
- water pollution controls
- erosion and sediment control
- emergency and spill response

- noise management
- dust control
- storage and handling of chemicals
- onsite traffic management
- changes to previously communicated environmental mitigation measures
- environmental procedures and alerts.

4.2.3 Driver Code of Conduct

As per Condition B12 of SSD 7424, drivers associated with the project will abide by the Driver Code of Conduct and induction training to minimise road traffic noise and other impacts that could arise as a result.

Roussakis Holdings Driver Code of Conduct is included in Appendix A.

4.3 Communication

4.3.1 Internal communication

Clear and effective communication throughout all internal levels and functions, including management and staff, is crucial to minimising environmental impacts and achieving continual improvements in environmental performance. Refer to Table 4.1 for key Roussakis Holdings personnel and their contact details.

4.3.2 Communication with relevant agencies and authorities

Roussakis Holdings and EMM have been liaising with relevant government agencies and service providers from the pre-approval stage of the project. Key government stakeholders include the DPHI, EPA, Heritage NSW, DCCEEW, TfNSW and Council.

Ongoing communication is planned with government agencies and service providers, should any of the following circumstances arise:

- Relevant archaeological experts and subsequently Heritage NSW will be contacted should an unexpected heritage item(s) be discovered during the construction phase of the project.
- EPA and Camden Council will be contacted in the case of a pollution incident or unexpected contaminated material(s) find within 24 hours.
- Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, a report will be supplied to DPHI outlining basic facts. This will be followed by a detailed report submitted to DPHI within 14 days after the incident or potential incident.
- Other government agencies will be contacted should issues arise relating to their area of management/jurisdiction.

Additionally, Roussakis Holdings will consult with relevant owner and/or provider of services that are likely to be affected by the project to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure.

Key government agency and service provider contacts are listed in Table 4.1.

4.3.3 Stakeholder and community communication

Other stakeholders that Roussakis Holdings and EMM have been communicating with during the pre-approval stage of the project include AGL and surrounding landowners and occupiers.

Community consultation has been undertaken during the pre-approval stage of the project, including during the preparation of the EIS, the public exhibition (seven weeks in July and August 2016) of the EIS and RTS stages.

Following project approval, a mailout was sent to all properties designated as sensitive receivers in the EIS (see Appendix C of the CNVMP).

A complaint management system to engage in active community consultation and maintain positive relations with local residents will be implemented for the duration of the development. The purpose of this system is to minimise complaints by addressing their concerns upfront and monitor the environmental performance of the site.

Prior to the commencement of construction, Roussakis Holdings will make the following documentation relevant to construction activities available on its website:

- EIS, RTS and approved development layout plans
- all current statutory approvals for the development
- all approved strategies, plans and programs required under the development consent
- a summary of monitoring results
- a complaints register updated on a quarterly basis
- all Annual Reviews
- any Independent Environmental Audits (IEA) and responses to recommendations
- any other matter required by the Planning Secretary.

4.3.4 Key contacts

Table 4.1 provides a list of key internal and stakeholder contacts.

Table 4.1 Key internal and stakeholder contacts

Contact name	Location/contact	Contact number
Roussakis Holdings		
Project manager	Evyn Tsintominas	0449 591 203
Site supervisor	Michael St James	0450 773 669
Environmental representative	To be confirmed	
HSE advisor	To be confirmed	
Stakeholders		
AGL / Other electricity provider for the site	To be confirmed	
Camden Council		02 4654 777
EPA Environment Line		131 555
Narellan Rural Fire Brigade		1800 679 737

Contact name	Location/contact	Contact number
Fire & Rescue NSW Narellan Fire Station		02 4647 7266
Narellan Police Station		02 4632 4499
Wildlife Information Rescue Education Service (WIRES)		1300 094 737

4.4 Documentation

Roussakis Holdings environmental representative is responsible for maintaining all environmental documentation so that they are always current at the point of use. Documents to be kept up to date include:

- monitoring, inspection and audit/compliance reports and records
- correspondence with public authorities
- correspondence with surrounding landowners and occupiers, and any other community members
- induction and training records
- documentation relevant to environmental incidents and non-conformances, complaints and corrective action
- minutes of CEMP review meetings and evidence of actions taken.

All environmental management documents should be subject to ongoing review and continual improvement. Only the environmental representative has the authority to change any of the environmental management documentation.

Copies of documents to be kept on site at all times include:

- development consent SSD 7424 (as modified)
- EPL
- relevant construction environmental management plans including:
  - this CEMP
  - CNVMP (Appendix B)
  - WMP
  - Erosion and Sediment Control Plan (ESCP) (Appendix C)
- SWMS
- first aid instructions
- Pollution Incident Response Management Plan (PIRMP) and emergency evacuation protocols
- safety relevant documentation
- other approvals, permits and licences to undertake construction activities on-site.

4.4.1 CEMP review

Condition C7 of SSD 7424 requires that the CEMP be reviewed and revised, if necessary, within three months of an approval of a modification, approval of an Annual Review, submission of an incident report to DPHI and/or completion of an IEA.

4.4.2 Notification, consultation and approval of supporting documentation

A summary of review, consultation and approval requirements for supporting documentation is provided at Table 4.2.

Table 4.2 Summary of additional notification, consultation and approval requirements

Document	Requirement	Timing
Dilapidation report	Prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths) and submit a copy of the report to the DPHI and Council.	The dilapidation report will be provided to DPHI and Council for notification purposes. The dilapidation report and evidence of notification will be provided to the certifying authority prior to the commencement of construction.
Water management plan	Prepare a WMP in consultation with CL&W (now DCCEEW) to the satisfaction of the DPHI Secretary.	The WMP and evidence of consultation will be submitted to DPHI for approval, with approval to be provided prior to the commencement of construction. The WMP and evidence of consultation and approval will be provided to the certifying authority prior to the commencement of construction.
Soil salinity verification study	Prepare a soil salinity verification study at the site in consultation with Council.	The soil salinity verification study will be prepared as part of a geotechnical report. The geotechnical report will be finalised in consultation with Council prior to the commencement of construction. The geotechnical report and evidence of consultation will be provided to the certifying authority prior to the commencement of construction.
Fire safety systems	The final design of the fire hydrant system must be prepared in accordance with BCA Clause E1.3 and AS2419.1:2005, with a minimum flow rate of 50 L/s. The final design of the fire hydrant system must be prepared by a suitably qualified fire service engineer. At least 180 m^3 of fire water storage is to be provided on site, as designed by a suitably qualified engineer.	The final design of the fire safety systems and firewater containment design will be provided to the certifying authority prior to the issue of a construction certificate.

5 Management of key environmental aspects and risks

The management procedures in the following sections apply to the construction phase and indicate the measures that will be implemented to manage environmental aspects and risks identified in the EIS, RTS, and SSD 7424.

It is intended that this CEMP will be a live document, which is regularly reviewed for effectiveness and procedures. These should be modified where considered beneficial.

5.1 Noise and vibration

A CNVMP has been prepared, guided by the policies and guidelines listed in Section 3.1.2, to address the requirements of Condition B3 of SSD 7424.

The CNVMP specifies that the nearest noise sensitive receivers most likely to be affected by construction noise from the site are residences located approximately 120 m to the south-east of the facility. The closest residences are in Linton Road and Chapman Circuit, followed by Ashford Circuit and Downes Crescent (see Figure 2.2 in Appendix B). There are also adjacent industrial premises including an existing large industrial warehouse on the adjacent lot to the south-west and a light industrial building to the north.

5.1.1 Construction noise

Construction noise levels have been predicted to the nearest sensitive residential receivers; with indicative noise predictions provided in Table 5.1 during standard construction hours.

Table 5.1 Construction noise predictions

Representative receivers	Distance	Indicative predicted $L_{Aeq,15min}$ noise levels	Construction $L_{Aeq,15min}$ noise management levels
Nearest residences	≥120 m	47-60 dB	46 dB (75 dB highly noise affected)

Predictions presented in Table 5.1 are typical of construction works of this nature and in proximity to neighbours, which means that construction noise levels are likely to be above recommended noise goals at times. However, given that the predictions assume plant and equipment are operating simultaneously and continuously, it is likely that actual construction noise levels would be significantly less than those predicted for the majority of the time. Notwithstanding, Roussakis Holdings will actively manage construction noise from the site, as outlined in Section 5.1.3.

5.1.2 Construction vibration

Given that it is not yet known exactly what methods and/or vibration generating equipment will be utilised for the project, as a guide, safe working distances for typical items of vibration intensive plant are listed in Table 5.2. The safe working distances are quoted for both “Cosmetic Damage” (refer British Standard BS 7385) and “Human Comfort” (refer British Standard BS 6472-1).

Table 5.2 Recommended safe working distances for vibration intensive plant

Plant Item	Rating/Description	Safe working distance	
		Cosmetic damage (BS 7385)	Human response (BS 6472)
Vibratory Roller	<50kN (Typically 1-2 tonnes)	5 m	15 to 20 m
	<100kN (Typically 2-4 tonnes)	6 m	20 m
	<200kN (Typically 4-6 tonnes)	12 m	40 m
	<300kN (Typically 7-13 tonnes)	15 m	100 m
	>300kN (Typically 13-18 tonnes)	20 m	100 m
	>300kN (>18 tonnes)	25 m	100 m
Small hydraulic hammer	(300 kg - 5 to 12t excavator)	2 m	7 m
Medium hydraulic hammer	(900 kg - 12 to 18t excavator)	7 m	23 m
Large hydraulic hammer	(1600 kg - 18 to 34t excavator)	22 m	73 m
Vibratory pile driver	Sheet piles	2 m to 20 m	20 m
Pile boring	≤ 800 mm	2 m (nominal)	N/A
Jackhammer	Hand held	1 m (nominal)	Avoid contact with structure

Source: Transport Infrastructure Development Corporation Construction's Construction Noise Strategy (Rail Projects), November 2007.

The safe working distances presented in Table 5.2 are indicative and will vary depending on the particular item of plant and local geotechnical conditions. They apply to cosmetic damage of typical buildings under typical geotechnical conditions.

The safe working distances in Table 5.2 relate to continuous vibration and apply to residential receivers. For most construction activities, vibration emissions are intermittent in nature and for this reason, higher vibration levels, occurring over shorter periods are allowed.

To predict the level of vibration that may occur at nearby structures (i.e. industrial building immediately west of the site and nearest residences), is complex and therefore the guide values presented in Table 5.2 should be followed in the first instance.

Management of vibrations will be required when vibratory activities are likely to occur within relatively close distance of nearby structures, with management measures presented in Section 5.1.3.

5.1.3 Management and control measures

It is likely that noise levels will be above the relevant noise management levels at times during the construction activities. It is also possible that vibration levels generated by construction activities will be above the relevant human comfort and structural vibration criteria. Site specific noise and vibration mitigation and management measures will therefore be implemented at the facility, as well as general good practice recommendation. These are provided in Table 5.3.

Table 5.3 Noise and vibration management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
Management measures		
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Noise and vibration nuisance to local residences and businesses	Construct acoustic fencing and structures (shed) along the site boundaries prior to commencement of construction (Condition B6). Noise modelling shows that completing the fencing prior to starting construction would result in a reduction of construction noise levels to below the noise management levels (NMLs) at most residential receivers. The exception would be at the most affected assessment locations R10 and R22 where the NMLs are likely to be marginally high (by up to 1 dB).	Engineering manager Project manager
	Limit vibrations for structural damage and human response in accordance with the German Standard DIN 4150-3 (2016-12) *Part 3 Structural Vibration in Building - Effects on Structures* and the NSW DEC *Assessing Vibration: a technical guideline* (2006).	Site manager All employees
	Minimise the number of plant items operating concurrently when in close proximity to receivers.	Site manager All employees
	Minimise the need for vehicle reversing, for example, by arranging for one-way site traffic routes.	Site manager All employees
	Monitoring will be used incorporating warning lights during high vibration producing works	Site manager All employees
Universal work practices		
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Noise and vibration nuisance to local residences and businesses	Regular reinforcement (such as toolbox talks) of the need to minimise noise and vibration).	Site manager
	Regular identification of noisy activities and adoption of improvement techniques.	Site manager All employees
	Avoiding the use of portable radios, public address systems or other methods of site communication that may unnecessarily impact upon nearby residents.	Site manager All employees
	Developing routes for the delivery of materials and parking of vehicles to minimise noise.	Site manager
	Avoiding the use of equipment that generates impulsive noise, where possible.	Site manager All employees
	Minimising the movement of materials and plant and unnecessary metal-on-metal contact.	Site manager All employees
	Minimising truck movements.	Site manager
	Scheduling respite periods of intensive works as determined through consultation with potentially affected neighbours (e.g. a daily respite period for a minimum of one hour at midday).	Environmental manager / Site manager
Plant and equipment		
	Selecting quieter plant and equipment based on the optimal power and size to most efficiently perform the required tasks.	Project manager Site manager

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Noise and vibration nuisance to local residences and businesses	Operating plant and equipment in the quietest and most efficient manner.	Site manager All employees
	Regularly inspecting and maintaining plant and equipment to minimise noise and vibration level increases, to ensure that all noise and vibration reduction devices are operating effectively.	Site manager
Work scheduling		
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Noise and vibration nuisance to local residences and businesses	Scheduling activities to minimise impacts by undertaking all possible work during hours that will least adversely affect sensitive receivers and by avoiding conflicts with other scheduled events.	Site manager
	Scheduling work to coincide with non-sensitive periods.	Project manager Site manager
	Scheduling noisy activities to coincide with high levels of neighbourhood noise so that noise from the activities is partially masked and not as intrusive.	Site manager
	Planning deliveries and access to the site to occur quietly and efficiently and organising parking only within designated areas located away from the sensitive receivers.	Project manager
	Optimising the number of deliveries to the site by amalgamating loads where possible and scheduling arrivals within designated hours.	Project manager
	Designating, designing and maintaining access routes to the site to minimise impacts.	Project manager Site manager
	Use contract conditions that include penalties for non-compliance with reasonable instructions by the principal to minimise noise or arrange suitable scheduling.	Project manager / HR
	High vibration generating activities should only be carried out in continuous blocks, with appropriate respite periods as determined through consultation with potentially affected neighbours.	Site manager
Community consultation		
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Noise and vibration nuisance and community complaints	As outlined in Section 4.3.3, community consultation has been undertaken during various stages of the project. Most recently, a mailout was sent to all properties designated as sensitive receivers in the EIS (see Appendix C of Appendix B). Community consultation and engagement will continue throughout the construction phase and the life of the project. An emergency after hours contact phone number will be put in place to allow contact with the project manager in relation to any environmental matter. This phone number will be clearly displayed on the site fencing.	Project manager Environmental representative

In addition to the management measures outlined in Table 5.3, additional noise management strategies will be developed throughout the construction phase in consultation with the community. These could include:

- scheduling respite periods (minimum of one hour between each block of work) or intensive works
- notifying the closest neighbours (e.g. letter box drop prior to the start of works) when works are expected to be generating high noise emissions.

5.2 Water

A WMP has been prepared in accordance with Condition B33 of SSD 7424. The mitigation measures outlined in the WMP are outlined in Section 5.2.3.

5.2.1 Surface water

The stormwater management system for the site has been designed to confirm with relevant guidelines listed in Section 3.1.2.

The site surface will be fully sealed other than for the landscaped area along the street frontage. The grading of the ground slab would generally follow the existing site ground slopes. The open area would have runoff drainage overland to the water treatment basin located in the north-eastern corner of the site. A piped drainage system will be implemented and designed to Council's Standards.

A sediment basin will be constructed within the proposed footprint of the water treatment basin in the initial construction works on the site. This water treatment basin will be used as the treatment basin during the construction of the remainder of the development on the site.

Additional erosion and sediment control measures will be implemented to minimise the extent of sediment in runoff during construction from the site. The erosion and sediment control plan is included in Appendix C, and some mitigation measures are included in Table 5.4.

5.2.2 Groundwater

Project related ground excavations, including footings and an onsite sedimentation basin are expected to be less than 3.5 m deep. Most of the excavations are expected to be shallower than the depth to groundwater and therefore, impacts to groundwater in the uppermost competent rock are not expected anywhere on-site apart from the water treatment basin location.

Eventually, the site will be sealed and this will prevent any potential contamination from entering the groundwater. Prior to sealing the site (i.e. construction Stage 1), best practice management and mitigation measures will be employed to prevent contamination of groundwater resources, as outlined in Section 5.2.3.

The construction of the water treatment basin will require excavation over the proposed footprint of the sediment basin in the north-eastern corner of the site. The basin with an area of approximately 45 m^2 is very small when compared to the area of the site 6,862 m^2 and is less than 0.6% of the site.

The duration over which the excavated area for the basin is open will be minimised and will be no longer than seven days. The likely volume of groundwater to be removed during the basin construction will be around 10 m^3. This water will be disposed onsite for dust suppression purposes during construction.

5.2.3 Management and control measures

Site specific surface water and groundwater, including erosion and sediment control, mitigation and management measures will be implemented at the facility during the construction phase. These are provided in Table 5.4.

Table 5.4 Water management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
Surface water and groundwater, including sediment and erosion control		
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Pollution of Kenny Creek and groundwater resources • Public and environmental health hazard	Prior to the commencement of construction, Roussakis Holdings will install and maintain suitable erosion and sediment control measures on-site, in accordance with relevant requirements in the latest version of the Blue Book and the erosion and sediment control plan contained within the WMP.	Project manager Environmental manager / representative
	Construction will not commence until WMP required by Condition B3 is approved by the Secretary.	Project manager Environmental manager / representative
	As soon as the shed is built, it will be used to house the majority of the processing activities, preventing generation of runoff from these activities.	Site manager All employees
	Location of sheds outside of major overland flow paths.	Engineering manager
	Connection to the sewage system for onsite personnel amenities.	Project manager Environmental manager / representative
	Groundwater will not be used. However, in the event that groundwater is intersected during construction Roussakis Holdings will: a) obtain the necessary water licences or approvals from the Water NSW b) develop a Groundwater Management Plan for the testing, dewatering, storage, movement and treatment of any groundwater to the satisfaction of the DCCEEW.	Environmental manager / representative
	No significant excavations over the site and stabilisation of the majority of the site surface.	Site manager All employees
	Regular maintenance of source controls and removal of accumulated materials.	Site manager All employees
	No run-off on the site from external areas.	Site manager All employees
	Formation of a sediment basin within the proposed footprint of the treatment basin.	Site manager All employees
	Control of flows from the final sediment basin.	Site manager All employees
	Flocculation of stored water in basins as necessary.	Site manager
	Excavation into the alluvium on the site will be avoided where feasible.	Engineering manager Site manager All employees
	While no significant dewatering is predicted to be required during the construction of the footings, DCCEEW will be notified and an aquifer interference licence will be obtained if more than 3 ML of groundwater needs to be extracted during the construction.	Project manager Environmental manager /representative
	No significant excavations within the site.	Site manager All employees
	Bunded fuels storage area.	Site manager All employees

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
	Surface water captured within the runoff management system during the site construction phase will be used for dust suppression so that mains water is not required for this purpose.	Site manager All employees
	Dust suppression as required.	Site manager All employees
	Additional temporary sediment control as needed during installation of works at the front of the site (i.e. site security fencing and landscaped area).	Site manager All employees
	Water will not be used for any other activities other than for dust suppression.	Site manager All employees
	180m^3 of storage will be provided onsite for the collection and storage of contaminated fire water.	Fire services engineer
	A spill kit should be kept on site. All fuel, oil and other chemical spills should be attended to and reported immediately.	Environmental manager / representative Site manager All employees

5.3 Air quality

5.3.1 Fumes and dust

Potential sources of particulate matter emissions during the construction phase of the project include:

- vehicle entrainment of particulate matter due to earthworks within the facility boundaries
- unloading of construction material within the site
- diesel fuel combustion by on-site plant and equipment.

The following activities are likely to generate dust during the construction phase of the project:

- vehicle and mobile equipment movement on unsealed surfaces prior to the site being sealed
- construction material handling
- soil disturbance including minor excavation works
- installing anchors and footings into the ground.

5.3.2 Odour

There are no foreseeable odour impacts anticipated as a result of the construction works.

5.3.3 Management and control measures

Ramboll Environ was commissioned to develop an Air Quality Management Plan (AQMP) for the facility (Ramboll Environ 2018). Some of the following fumes, dust and odour mitigation measures have been taken from the Ramboll Environ AQMP.

Table 5.5 Air quality management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Air and surface water pollution • Dust and odour nuisance to local residents and businesses • Public and environmental health hazard	Exposed surfaces and stockpiles will be suppressed by regular watering.	Site manager All employees
	Regular visual monitoring of the dust levels at the facility.	Site manager Environmental manager / representative All employees
	Minimise idling vehicles onsite, where practicable.	All employees
	Ensure proper maintenance and turning of all equipment engines	All employees
	Restricting operations during strong winds.	Project manager Environmental manager / representative Site manager
	Arranging or street sweeping of hardstand/roads when required.	Site manager All employees
	Trucks associated with the facility constructions works will not track dirt onto the public road network. As a result, public roads used by these trucks will be kept clean.	Truck drivers
	As soon as the shed is built, all construction materials will be stockpiled within the shed	Site manager All employees
	Green waste and timber to be used as part of the construction process will be stockpiled in a covered bay.	Site manager All employees
	As soon as sealed areas are created, they will be maintained.	Site manager
	Truck tyres will be cleaned to prevent mud or sediment being carried to and deposited on the access roads (and public roads).	All employees and vehicle drivers
	Dust generating activities will be generally undertaken within the main shed.	Site manager
	No composting will be undertaken on the site.	Environmental manager / representative
	Travel speeds along all unpaved roads within the facility are limited to 20 km/h, as reduction in vehicle travel speed minimises dust generation.	Site manager All employees and vehicle drivers
	All trucks entering or leaving the site with construction material loads will have their loads covered.	Site manager Truck drivers
	Regular monitoring of odour levels in the facility.	Site manager Environmental manager / representative All employees

5.4 Greenhouse gases

5.4.1 Management and control measures

Management measures that will be implemented during the construction phase to minimise greenhouse gas emissions are included in Table 5.6.

Table 5.6 Greenhouse gas management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS • Contribution to greenhouse gas emissions	On-site equipment will be regularly maintained and serviced to maximise fuel efficiency.	Environmental manager / representative
	Vehicle kilometres travelled on site will be minimised.	All vehicle drivers
	Energy efficiency will be progressively reviewed and implemented throughout the life of the facility.	Environmental manager / representative

5.5 Heritage

5.5.1 Unexpected heritage items

Condition C1(d) of SSD 7424 specifies that the CEMP must include an unexpected finds protocol for heritage items. There have been instances, even when thorough cultural heritage assessments are undertaken during the environmental assessment process, where unexpected heritage items (both Aboriginal and non-Aboriginal) are not appropriately identified and are subsequently found on a construction site.

The unexpected items can be broadly categorised into three groups: Aboriginal objects, historic (non-Aboriginal) heritage items, and human skeletal remains. Examples of potential Aboriginal and non-Aboriginal discoveries may include, but are not limited to:

- Aboriginal stone artefacts, shell middens, burial sites, engraved rock art, scarred trees
- artefacts such as broken and complete bottles, ceramics, glass, animal bones and clay pipes
- remains of infrastructure such as buildings, stations, bridges, rail lines, drainage services, kerbs and pavements and road surfaces
- human skeletal remains.

5.5.2 Unexpected finds protocol and management measures

As mentioned in Chapter 3, heritage items are unlikely to be found within the vicinity of the facility. Nevertheless, the following management measures should be employed on-site:

- Aboriginal objects and places remain protected under the NPW Act. Considering this, all workers should be made aware that it is illegal to harm an Aboriginal object, and if a potential Aboriginal object is encountered during activities associated with the project, all work will cease in the immediate vicinity of the item and a qualified heritage professional will be contacted for advice.
- If unexpected historical archaeology is discovered during construction, work in the immediate area must cease and an archaeologist must be contacted to make an assessment of the find. If it is determined to be a relic under the *Heritage Act 1977*, further investigation may be required.

- In the event that known or suspected human skeletal remains are encountered during the activity, the following procedure will be followed:
    - all work in the immediate vicinity will cease and the find will be immediately reported to the work supervisor who will immediately advise the Environment Manager or other nominated senior staff member
    - the Environment Manager or other nominated senior staff member will immediately notify the police and the state coroner (as required for all human remains discoveries)
    - the Environment Manager or other nominated senior staff member will contact Heritage NSW for advice on identification of the skeletal material
    - if it is determined that the skeletal material is Aboriginal ancestral remains, the Local Aboriginal Land Council will be contacted and consultative arrangements will be made to discuss ongoing care of the remains
    - if it is determined that the skeletal material is not Aboriginal ancestral remains, further investigation will be conducted to determine if the remains represent a historical grave or if further involvement of the police is required.

5.6 Traffic and transport

5.6.1 Management and control measures

Condition B18 of SSD 7424 specifies traffic and access conditions for the facility, which are, along with other management measures, included in Table 5.7.

Table 5.7 Traffic and transport management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS	All drivers employed by Roussakis Holdings at the facility must abide by the Driver Code of Conduct attached in Appendix A.	Site manager All drivers
	Vehicles dispatching materials for construction will be covered prior to leaving the site.	Site manager All drivers

As noted in Table 2.2, Stage 1 of the construction will include deployment of temporary traffic control devices (TCDs). TCDs are signs, traffic signals road markings, and or other devices designed to regulate, inform, warn or guide road users.

The TCDs for the site will include:

- signage:
    - warning and directional signage for drivers and pedestrians at entry/exit of the construction site
    - maximum site speed limit of 10 km/h
- entrance and exit lane line markings at the front of the site
- traffic cones or movable barriers within the site demarcating exclusion areas (dependent on daily activities).

5.7 Visual

5.7.1 Management and control measures

Management measures and site actions that will be implemented during construction to minimise visual impacts are listed in Table 5.8.

Table 5.8 Visual management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EIS and RTS	Roussakis Holdings will ensure that the external appearance of the facility is suitable and contributes to the visual character of the surrounding area (i.e. area is zoned IN1 industrial). Boundary fencing shall be of a visually attractive material and colour that has been agreed by the Secretary.	Project manager Environmental manager / representative
	Full height boundary fencing will be constructed prior to the commencement of construction of any part of the facility.	Project manager Site manager Environmental manager / representative
	The visual appearance of the site entrance on Anderson Road and the cul-de-sac area will be kept tidy throughout the construction works.	Site manager All employees

5.8 Waste

Waste will be management and controlled during the construction phase via implementation of measures outlined in Table 5.9.

5.8.1 Management and control measures

Table 5.9 Waste management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EPL, EIS and RTS • Improper disposal of waste causing public and environmental harm	All waste removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the waste.	Environmental manager / representative Site manager
	Roussakis Holdings will ensure that any waste generated on-site during construction is classified in accordance with the EPA's Waste Classification Guidelines, 2014 or its latest version and, disposed of to a facility that may lawfully accept the waste.	Environmental manager / representative Site manager
	Specific waste areas to be established, i.e. for food, drink and all other rubbish to be disposed offsite properly.	Site manager
	No food, drink or other rubbish to be disposed on site.	Site manager All employees
	No chemical or fuel wastes to be disposed of on site.	Site manager All employees
	No burning of waste is to occur on site.	Site manager

5.9 Contamination

Condition C1(d) of SSD 7424 specifies that the CEMP should include an unexpected finds protocol for contaminated material. Given the history of the site, contamination is unlikely. Nevertheless, should contaminated items be found, the steps outlined below should be followed.

The appropriate management of unexpected finds will minimise human health and environmental risks from the disturbance of potential contaminated materials, and will ensure the material is managed in accordance with the CLM Act.

Unexpected finds at the site could relate to buried finds and/or volatile contaminants including (but not limited to):

- oil/diesel/tar/petrol sheens, free product, odours or impacted soils
- buried material, such as drums, disused pipe work, tyres or waste
- asbestos pieces, fibre cement sheets, fibres
- discoloured or odorous soil
- acid sulphate soils (ASS) or potential ASS, appearing as grey, gluggy soils with rotten egg smell.

The following procedures will be implemented if suspected contamination is discovered during excavation:

1. Upon discovery of suspected contamination, all construction works in the immediate vicinity are to cease, the site manager is to be notified and the area barricaded.
2. The potentially contaminated material is to be removed and disposed of in accordance with the *Waste Classification Guidelines* (EPA 2014). This may include removal of a buffer zone around the potentially contaminated material, based on field observations or volatile detections with a photoionization detector. The notification and engagement of a qualified environmental consultant will be required to assess the nature and degree of potential contamination and classification.
3. Unless otherwise demonstrated, suspected potentially contaminated material will be treated as contaminated material and will be removed off-site to a waste facility licensed to accept contaminated material.
4. If the find is suspected to be asbestos material, the area is to be kept wet and management practices implemented in accordance with the *Code of Practice: How to Manage and Control Asbestos in the Workplace* (Safework NSW 2016). If appropriate, the material will be covered to prevent dust generation, pending final management.
5. If the find is actually ASS or potential ASS, a suitably qualified consultant is to be engaged to manage the ASS in accordance with the N*ational Guidance for the Management of Acid Sulfate Soils in Inland Aquatic Ecosystems* (EPHC and NRMMC 2011).
6. Unexpected finds are to be documented throughout the unexpected finds process. This will include date(s), location(s), persons involved and remedial actions.
7. Once the area is remediated and validated construction works will recommence.
8. Any required remediation will be directed by the Site Manager with supervision from a qualified Environmental Consultant depending on the type and extent of contamination.

5.10 Hazardous goods, spills and leaks

Hydrocarbons such as fuels, oils, lubricants and other chemicals may be used during the construction phase of the project.

A list of dangerous goods and other potentially hazardous materials to be stored on site, and their quantities, is listed in Table 5.1 of the EIS. Screen testing carried out against the thresholds in SEPP 33 has determined that:

- the hazardous materials are not potentially hazardous
- the number of weekly and annual delivers and the approximate quantities per load to the site are below the SEPP 33 transporting threshold.

A requirement of Condition B39 of SSD 7424 is to store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with relevant Australian Standards and EPA (2007) *Storing and Handling Liquids: Environmental Protection – Participants Manual.*

5.10.1 Management and control measures

Management measures outlined in Table 5.10 should be employed to avoid any environmental impacts.

Table 5.10 Hazardous goods, spills and leaks management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EPL, EIS and RTS • Fuels and lubricants could potentially spill or leak and pollute the local environment	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times.	Environmental manager / representative Site manager
	Management and control measures for hazardous goods, spills and leaks should be in accordance with relevant guidelines listed in Section 3.1.2.	Environmental manager / representative Site manager
	Hydrocarbons will be stored in containers and within bunded areas to contain spill and leakages.	Site manager
	A spill kit will be kept in the construction area at all times.	Site manager
	Vehicles and machinery will not be refilled or lubricated over unsealed surfaces.	Site manager

5.11 Bushfire and fire

The site is mapped as containing bushfire prone land. A section of the project will be on bushfire prone land and measures will be incorporated to enable compliance with the objectives of the *Planning for Bushfire Protection 2019* (PBP). Specifically, an asset protection zone (APZ) will be provided and managed to enable fire fighter access, passage for evacuees and to reduce radiant heat at project buildings.

The final design of the fire hydrant system has been prepared by a qualified fire services engineer in accordance with BCA Clause E1.3. The system will comply with AS2419. 1:2005 except that the minimum flow rate shall be 50 L/s.

5.11.1 Management and control measures

The risk of the project initiating a bushfire will be minimise through the implementation of management measures outlined in Table 5.11.

Table 5.11 Bushfire and fire management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EPL, EIS and RTS • Potential bushfire hazard to the receiving public, assets and the environment	Smoking will only be allowed in designated areas and away from flammable chemicals and materials.	Site manager All employees
	Ensure water for firefighting (from holding tanks or mains) and other firefighting equipment is provided and regularly maintained and inspected, and that it is located in an appropriately signed posted area with unimpeded access.	Project manager Site manager
	Any spills of flammable chemicals will be attended to immediately.	Site manager
	The works will not occur on days that have extreme or catastrophic fire rating.	Site manager

5.12 Energy

5.12.1 Management and control measures

It is a requirement of Condition C1(g) of SSD 7424 to incorporate measures to reduce energy consumption. Management measures related to the consumption of energy during the construction phase of the project are included in Table 5.12.

Table 5.12 Energy management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Non-conformance with CEMP objectives, SSD 7424, EPL, EIS and RTS	Implement energy efficient design during the development/planning stages of the facility, taking into consideration layout, shape, spacing, orientation and relationship of onsite structures.	Engineering manager Project manager
	Purchase energy-efficient equipment and machinery.	Project manager
	Turn off all equipment and machinery when not in use.	Site manager
	Use energy efficient materials and construction practices.	Project manager Site manager
	Maintain equipment regularly, by setting up a maintenance schedule, keeping equipment free from obstructions and preventing over-heating by cleaning filters and fans regularly.	Site manager

5.13 Public safety

Construction works will predominantly be on privately owned land which is not readily accessible to the public. Construction works will be temporary.

5.13.1 Management and control measures

The following management measures will be implemented.

Table 5.13 Public safety management and control measures

Potential impact/s	Actions to manage (remove or mitigate) impact	Responsibility
• Public safety hazards	Safety signage will be placed around the construction site.	Site manager
	Fencing will be constructed before any of the construction activities take place.	Project manager Site manager

6 Environmental management systems

6.1 Safe Work Method Statements (or equivalent)

Safe Work Method Statements (SWMS) are a key construction site document that outlines the work activities to be undertaken at a workplace, the safety hazards and environmental risks that may arise from these activities, and the controls to put in place to manage and mitigate the hazards and risks.

In most instances, the SWMS will be prepared by the work crew carrying out work activities associated with the construction of the project. The SWMS will then be signed off by the site supervisor.

Where the work crew is not involved in developing the SWMS, they must have an opportunity to read, understand and sign the SWMS prior to commencing the work.

Every activity that is undertaken as part of the construction works must be carried out in accordance with a developed SWMS.

6.2 Monitoring and measurement

A requirement of Condition C1(f) of SSD 7424 is to detail how the environmental performances of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts.

Environmental monitoring will involve observing, collecting and interpreting data to evaluate the effectiveness of the specified environmental management measures, and to facilitate CEMP review and improvement where necessary.

Monitoring will be carried out as frequently as required for each of the environmental aspects covered in Chapter 5.

6.3 Audits and inspections

6.3.1 Audits

The implementation of the CEMP will be audited by the environmental representative in conjunction with the project manager to ensure effective compliance with safety hazards, environmental controls, reporting and incident management.

6.3.2 Regular inspections

The environmental representative will undertake inspections of the work sites weekly and after rainfall events (>10 mm in 24 hours), to ensure that environmental controls outlined in this CEMP are implemented and to evaluate their effectiveness. Their observations will be recorded, and any work requiring rectification will be communicated to the site manager.

Rectification work will be arranged by the site manager, and completed with accountability and within the given timeframe. Any rectification work that cannot be completed within the specified timeframe shall be recorded as a corrective action.

Issues arising from site environment inspections shall be discussed at regular toolbox meetings and any concerns raised will be considered by the environmental representative and project manager.

6.3.3 Pre work inspections

An inspection will be carried out by the work crew prior to the commencement of works on each shift, which will include a check of relevant environmental controls and resources required to ensure effective operation and maintenance. Works will not commence unless inspections are found to be satisfactory.

6.4 Non-conformance and corrective actions

Roussakis Holdings will identify environmental non-conformances, including environmental incidents, during the construction phase of the project and will undertake the required corrective actions to address the non-conformance and implement preventative actions where required.

Environmental non-conformance will be identified through processes outlined in this CEMP such as monitoring, audits, regular inspections and complaints. Reporting on environmental non-conformance will be the responsibility of all Roussakis Holdings employees and contractors. Tracking of environmental non-conformances and associated corrective actions will be the responsibility of the environmental representative.

6.4.1 Environmental Incident and Action Register

When an environmental non-conformance or environmental incident is identified, the details of these will be documented in an Environmental Incident and Action Register, with the following steps to be taken:

- the register will outline the nature of the non-conformance/incident, the corrective and preventative actions proposed and to be undertaken, the responsibilities and schedule for completion of these actions
- non-conformances associated with monitoring, audits, inspections and complaints will be linked to the records of these
- once an action has been completed, the status of the incident will be updated to close the action, with comments and completion date
- the Environmental Incident and Action Register will be reviewed weekly by the environmental representative.

Roussakis Holdings will maintain a register of accidents, incidents and potential incidents for the duration of the development. This register is to be made available for inspection at any time by DPHI, EPA or the Independent Hazard Auditor.

Further detail about the management of incidents and incident response planning is covered in Chapter 7.

7 Environmental incidents and emergencies

7.1 Public complaints

Any enquiries or complaints made by members of the public to site personnel should be directed to the project manager.

Roussakis Holdings employees or contractors present on site during the construction of the project should not speculate or engage with the public regarding their complaints or enquiries.

To effectively manage any requests for information or respond to any public concerns in relation to the proposed construction activities and site operation, an emergency after hours contact phone number will be put in place to allow contact with the project manager in relation to any environmental matter. This phone number will be clearly displayed on the site fencing.

All information relating to such complaints will be kept in a register. The register will include but not be restricted to the following information:

- date and time of complaint
- complainant details (i.e. full name, address and contact details where these have been voluntarily provided)
- nature and source of complaint
- action taken
- follow-up with complainant.

The complaint register will be made available to any relevant regulatory authority upon request.

Should the complaint be relevant to any of the conditions of SSD 7424, it shall be handled as per the conditions relevant to that environmental aspect.

7.2 Incident response

All environmental incidents, including complaints, near misses and non-compliances with the CEMP must be reported internally so that they can be investigated, corrected and prevented from recurring. These will be recorded into an Environmental Incident and Action Register, as per specifications outlined in Section 6.4.1.

Persons that have been involved or have witnessed an incident will report it immediately to the site manager or environmental representative. Once the incident has been reported internally via the correct channels, all efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place.

Incident investigations will be closed as quickly as possible, taking all required action to resolve each environmental incident and re-occurrence.

Within 24 hours of an incident or potential incident with actual or potential significant offsite impacts on people or the biophysical environment, a report must be supplied to DPHI outlining the basic facts of the incident. A further detailed report must be prepared and submitted following investigations of the causes and identification of the necessary additional preventative measures no later than 14 days after the incident or potential incident.

EPA will also be notified of an actual or potential incident with significant offsite impacts immediately following the incident or potential incident.

7.3 Emergency management

The POEO Act requires the occupier of premises, the employer or any person carrying out an activity which has caused a pollution incident to immediately notify each relevant authority when material harm to the environment is caused or threatened.

Persons responsible for reporting a pollution incident should follow this information and procedures:

- the person should call 000 if the incident presents an immediate threat to human health or property. Dialling 000 serves to contact Fire and Rescue NSW, the NSW Police and the NSW Ambulance Services
- if the incident does not require any of the above-listed services, the 24-hour hotline for each of the following services can be called, as listed in Table 7.1.

Emergency contact details are listed in a table below.

Table 7.1 Emergency Contact Details

Emergency contact organisation	Contact details
Police	000
Ambulance	000
Fire and Rescue NSW	000
Narellan Rural Fire Brigade	1800 679 737
EPA's Environment Line	131 555
WorkSafe NSW	131 050
Sydney Water	13 20 90
Relevant Energy provider	To be confirmed
Wildlife Information Rescue Education Service (WIRES)	1300 094 737
Environmental representative	To be confirmed
Project manager	To be confirmed

References

Environment Protection Authority 2014, *Waste Classification Guidelines – Part 1: Classification of Waste.*

Environment Protection and Heritage Council and Natural Resource Management Ministerial Council (EPHC and NRMMC) 2011, *National Guidance for the Management of Acid Sulfate Soils in Inland Aquatic Ecosystems*.

NSW Safework 2016, *How to Manage and Control Asbestos in the Workplace*.

Appendix A
Driver Code of Conduct

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Driver Code of Conduct

Condition B12 of SSD 7424 requires Roussakis Holdings Pty Ltd (Roussakis Holdings) prepare a Driver Code of Conduct and induction training for the project to minimise road traffic noise, prior to the commencement of construction. Under this condition, Roussakis Holdings must update the Driver Code of Conduct and induction training for construction and operation and must implement the Drive Code of Conduct for the life of the project. While the site induction content is outlined in the Construction Environmental Management Plan (CEMP), this document focuses on the requirements of the code of conduct for drivers.

1 Purpose and objectives

The purpose of this document is to minimise the impact of vehicle traffic associated with the construction and operation phases of the project on the surrounding community and to manage the movement of heavy vehicles using the conditions of consent of SSD 7424 and best industry practice. This document clearly defines acceptable behaviour, and environmental and safety requirements, of all vehicle drivers, including Roussakis Holdings employees and subcontractors, operating as part of the project works.

2 Responsibilities of drivers

2.1 Legislative requirements and guidelines

Vehicle drivers hauling from Roussakis Holdings facility at 52 Anderson Road, Smeaton Grange must:

- comply with the *Road Transport Act 2013* and its associated regulations in regard to drug use and alcohol consumption
- comply with Australian road rules external to the site
- comply with *Guidelines for Managing Heavy Vehicle Driver Fatigue* (National Transport Commission 2007)
- comply with the relevant conditions of consent specified in SSD 7424, which will be covered at the site induction and in this Driver Code of Conduct.

In addition, trucks accessing the site will be subject to the same Camden Council rules that apply to trucks accessing other businesses in the Smeaton Grange Industrial Estate.

2.2 General requirements

Vehicle drivers hauling from the Roussakis Holdings facility must:

- hold a current and valid driver's licence for the class of vehicle that they operate
- have undertaken a site induction conducted by an approved member of the facility staff or an approved delegate

- at the commencement of each shift, attend a pre-start meeting/toolbox talks where drivers will be informed about work health and safety and environmental issues that may have arisen from the previous shift
- comply with the directions of the traffic controller and other authorised site personnel when within the site
- comply with speed limits on all roads and in different conditions, and with posted (road) load limits
- comply by not overloading the vehicles they operate.

2.3 Environmental compliance, safety and road rules

Drivers are to practice environmental compliance, safety and road rules which include, but are not limited to:

- operate the vehicle in a safe and responsible manner within and external to the site
- be aware of school zones, school bus routes and residential areas
- drive in a manner that is appropriate with road and weather conditions
- ensure that if passing any pedestrians or cyclists a safe separation distance exists as well as a reduction in speed if appropriate
- not operate any vehicles or machines whilst suffering from fatigue or under the influence of drugs and/or alcohol
- there is to be no blocking of residential driveways or any other access points
- all heavy vehicles are to access the site from Anderson Road via Anzac Avenue. Narellan Road and Camden Valley Way which are major heavy vehicle routes. The vehicle movements associated with the proposed operations are described in Section 6.1 and Appendix D of the Smeaton Grange EIS
- all vehicles are to enter and exit the site in a forward direction
- all vehicles will be wholly contained onsite before being required to stop
- all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network
- all loading and unloading of materials from vehicles will be carried out in appropriate off-load areas
- heavy vehicles associated with the project will not be parked or queuing on the public road network including local roads or footpaths near the site
- vehicle manoeuvring areas must always be kept clear of any obstacles including parked cars
- all trucks leaving the site must depart via a wheel wash facility to prevent mud, dust or debris from being deposited on Council roads.

2.4 Other requirements

Drivers must also abide by the following requirements:

- behave in a professional manner at all times, ensuring that they remain calm and courteous when in contact with other drivers and members of the public
- maintain trucks in good working order and a clean and tidy condition, and immediately report any vehicle malfunctions
- when parking, drivers are to activate hand break and leave the vehicle in gear
- never to leave the vehicles with the engine running
- drivers entering the project area must wear appropriate personal protective equipment (PPE)
- enter and exit from the project construction sites during approved hours, while abiding by these requirements:
    - vehicles will access the site to drop off waste between 6:00 am and 7:00 am
    - the site will be shut between 10:00 pm and 6:00 am, on Sundays, and on public holidays.

Appendix B

Construction Noise and Vibration Management Plans (provided as a separate document)

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Appendix C

Erosion and Sediment Control Plan

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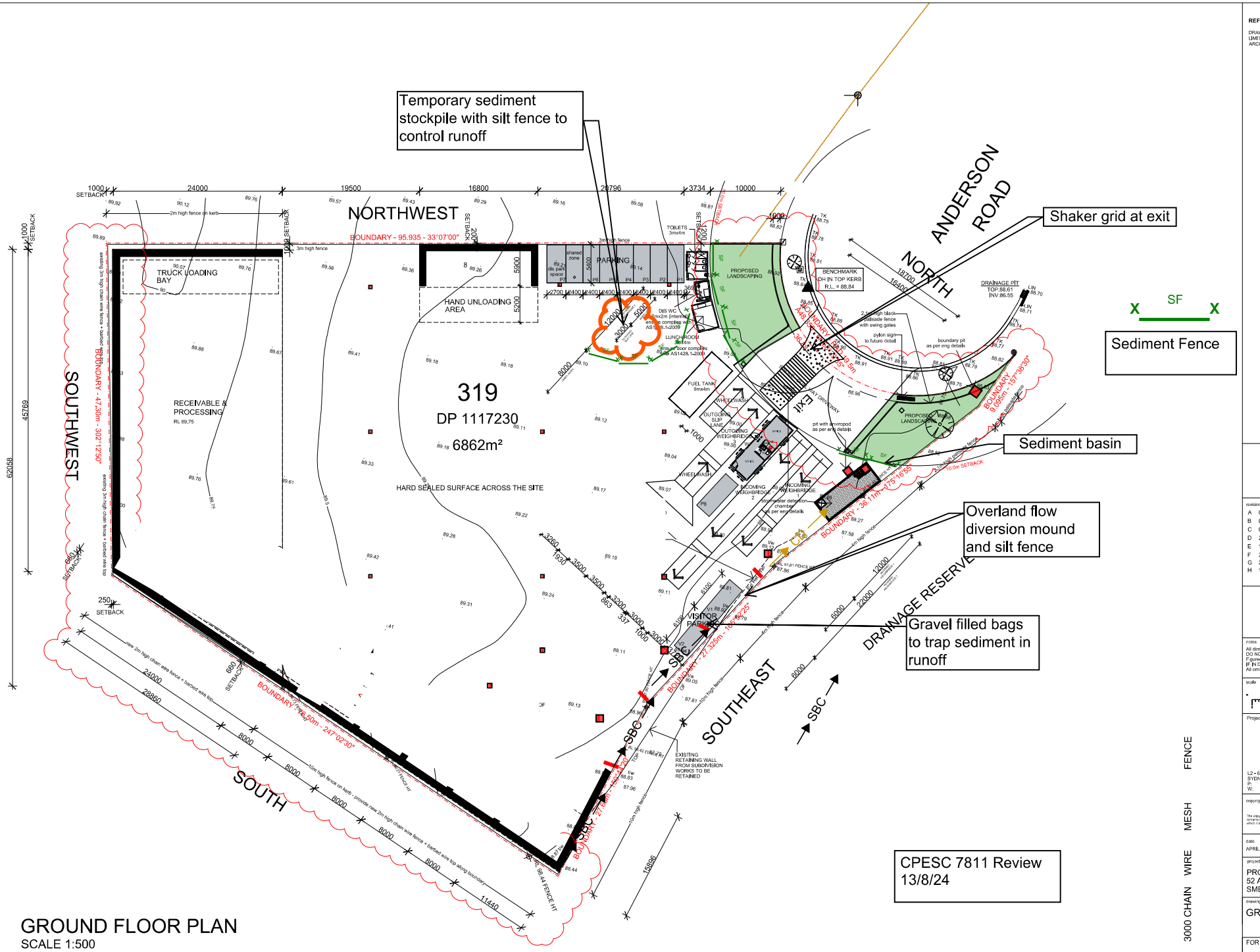

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS

revision		
A	02.02.16	ISSUED FOR GENERAL INFORMATION
B	04.03.16	ISSUED FOR GENERAL INFORMATION
C	06.05.16	ISSUED FOR GENERAL INFORMATION
D	23.05.16	ISSUED FOR GENERAL INFORMATION
E	18.08.16	ISSUED FOR GENERAL INFORMATION
F	28.04.17	ISSUED FOR GENERAL INFORMATION
G	20.02.18	ISSUED FOR GENERAL INFORMATION
H	10.05.18	ISSUED FOR GENERAL INFORMATION

notes
All dimensions and setouts to be verified prior to commencement
DO NOT SCALE measurements off drawings
Figured dimensions to be used at all times
IF IN DOUBT - ASK
All omissions or discrepancies to be notified to the architect

scale 1:100 @ A3

Project Architect

L2 - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.cheminedesign.com.au

date APRIL 2013 | drawn SS

project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
GROUND FLOOR PLAN

FOR DA APPROVAL

job no. J15306 | DA | drawing no. 100 | rev H

Appendix D
Facility Plans and Drawings

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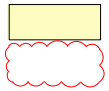
PROPOSED WASTE TRANSFER STATION
AT
52 ANDERSON ROAD SMEATON GRANGE

DRAWING LIST

000	COVER SHEET	REV I
100	GROUND FLOOR PLAN 1:500	REV K
101	ROOF PLAN 1:500	REV K
200	ELEVATIONS 1 1:250	REV J
201	ELEVATIONS 2 1:250	REV J
500	DETAILS SHEET1 1:250	REV G
501	DETAILS SHEET2 1:100	REV H
502	FRONT FENCE DETAIL	REV I

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS



EXTENT MODIFICATIONS

MODIFICATIONS TO APPROVED SSD 7424 (MOD2)

NO CHANGES TO SHEET

revision

I 28.04.23 General amendments

notes

All dimensions and setouts to be verified prior to commencement
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scale 1:500 @ A3

Project Architect

LZ - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.cdarchitects.com.au

date	drawn
FEB 2016	SS

project

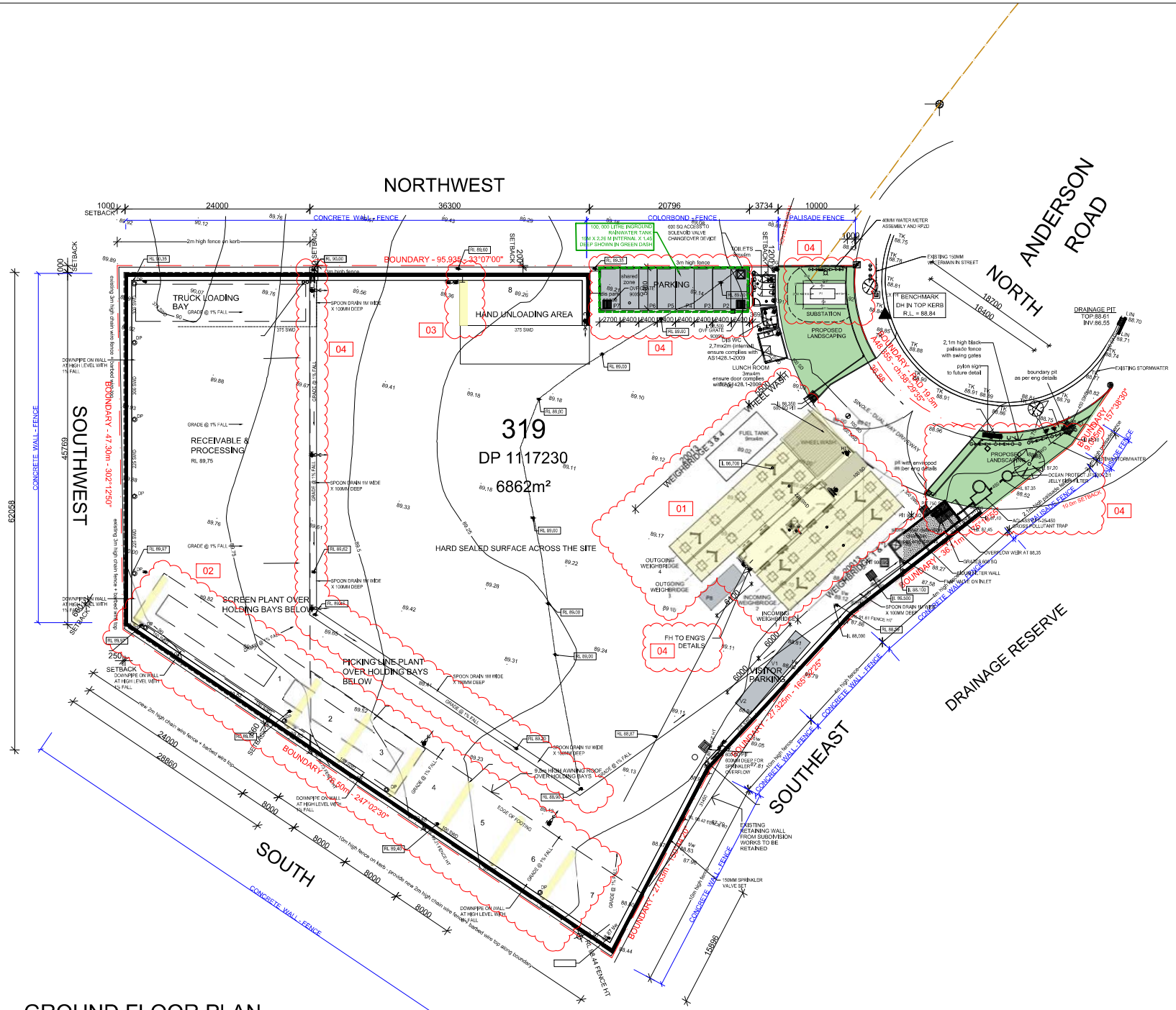
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title

COVER SHEET

FOR DA APPROVAL

job no.		drawing no.	rev
J15306	DA	000	I



GROUND FLOOR PLAN

SCALE 1:500

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS

EXTENT MODIFICATIONS

MODIFICATIONS TO APPROVED SSD 7424 (MOD2)

01
- INSTALLATION OF FOUR STANDARD 20m WEIGHBRIDGES (2x INBOUND & 2x OUTBOUND)
- REPOSITION OF WHEEL WASH
- RECONFIGURED WEIGHBRIDGE OFFICE AND PARKING SPACE

02
REMOVAL OF 7 MATERIALS SEPARATION WALLS FROM HOLDING BAY AREA

03
REMOVAL OF 1 SEPARATION WALL FROM THE UNLOADING AREA

04
HYDRAULIC & STORMWATER DESIGN, MODIFIED, ELECTRICAL SUBSTATION PROVIDED (REFER TO ENG'S DETAILS)

revision
K 21.12.23 Issue for Approval

notes
All dimensions and setouts to be verified prior to commencement
DO NOT SCALE measurements off drawings
Figured dimensions to be used at all times
IF IN DOUBT - ASK
All omissions or discrepancies to be notified to the architect

scale 1:100 @ A3

Project Architect

L2 - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.chaninedesign.com.au

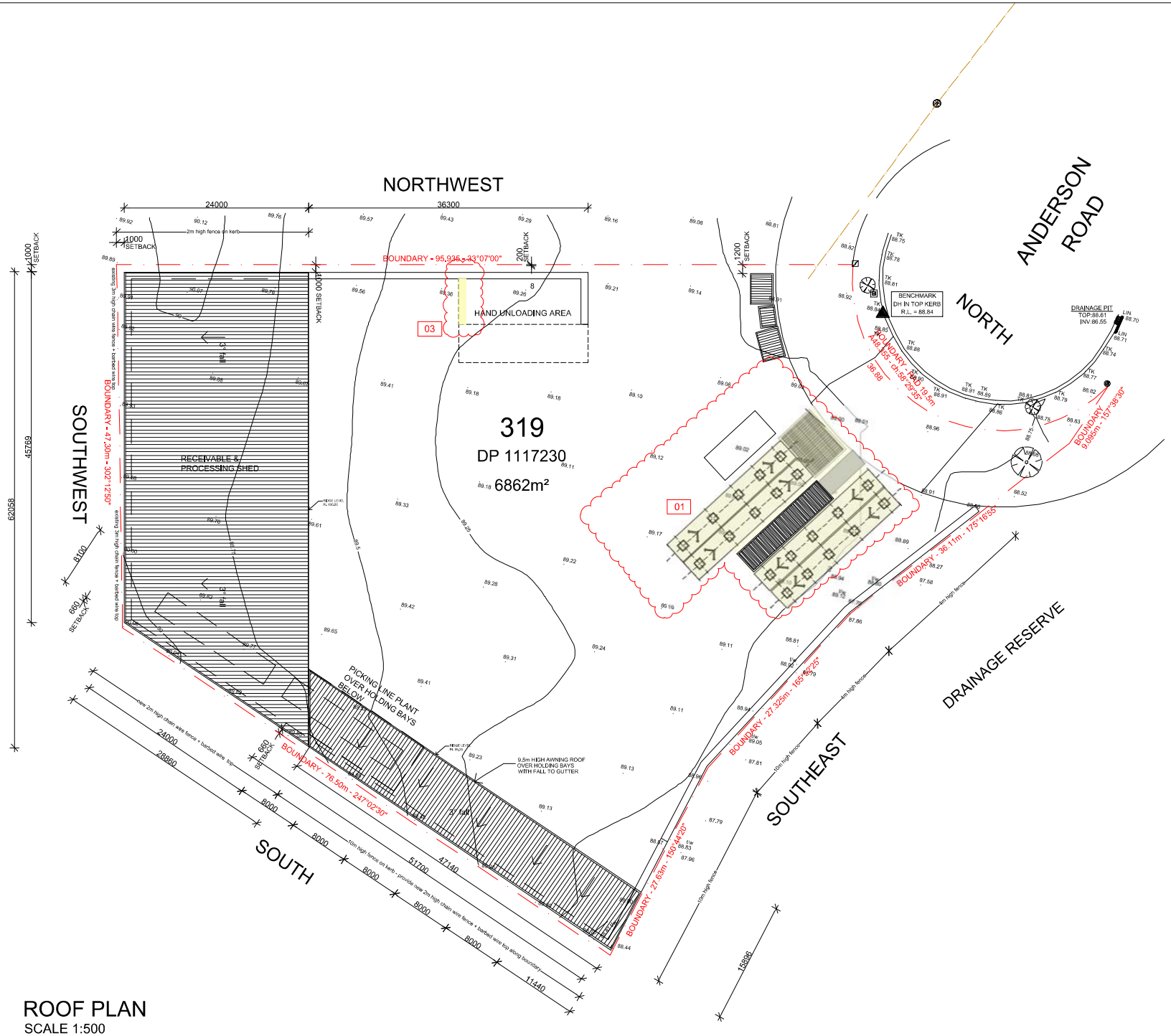
date APRIL 2013
drawn SS

project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
GROUND FLOOR PLAN

FOR DA APPROVAL

job no.		drawing no.	rev
J15306	DA	100	K



ROOF PLAN

SCALE 1:500

m 0 5 10 15 20 25 30 35 40 45 50 55 60 65 70 75 80 85 90 95 100

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS

EXTENT MODIFICATIONS

MODIFICATIONS TO APPROVED SSD 7424 (MOD2)

01
- INSTALLATION OF FOUR STANDARD 20m WEIGHBRIDGES (2x INBOUND & 2x OUTBOUND)
- REPOSITION OF WHEEL WASH
- RECONFIGURED WEIGHBRIDGE OFFICE AND PARKING SPACE

02
REMOVAL OF 7 MATERIALS SEPARATION WALLS FROM HOLDING BAY AREA

03
REMOVAL OF 1 SEPARATION WALL FROM THE UNLOADING AREA

04
HYDRAULIC & STORMWATER DESIGN, MODIFIED, ELECTRICAL SUBSTATION PROVIDED (REFER TO ENG'S DETAILS)

revision
K 21.12.23 Issue for Approval

notes
All dimensions and setouts to be verified prior to commencement
DO NOT SCALE measurements off drawings
Figured dimensions to be used at all times
IF IN DOUBT - ASK
All omissions or discrepancies to be notified to the architect

scale 1:100 @ A3

Project Architect

LZ - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.chanmedesign.com.au

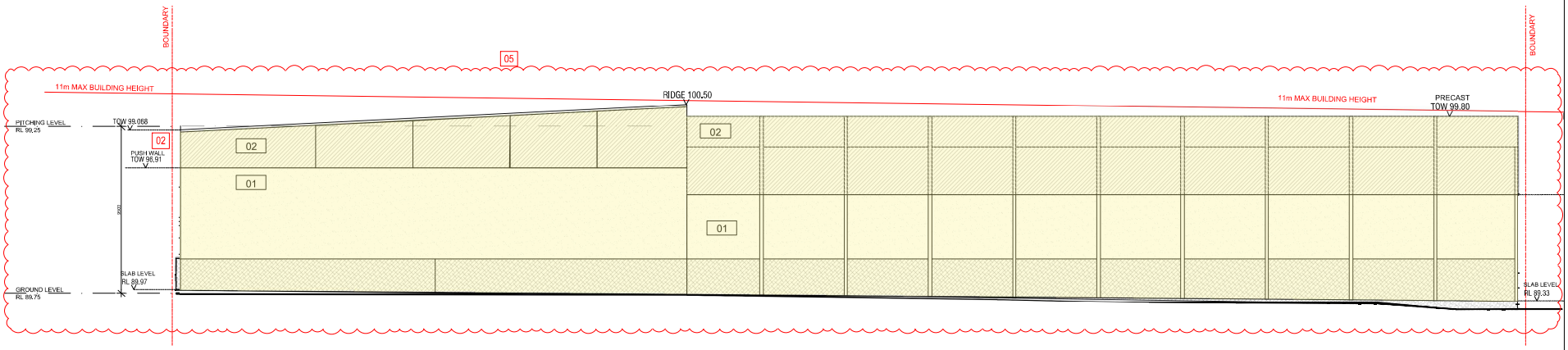
date APRIL 2013 | drawn SS

project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
ROOF PLAN

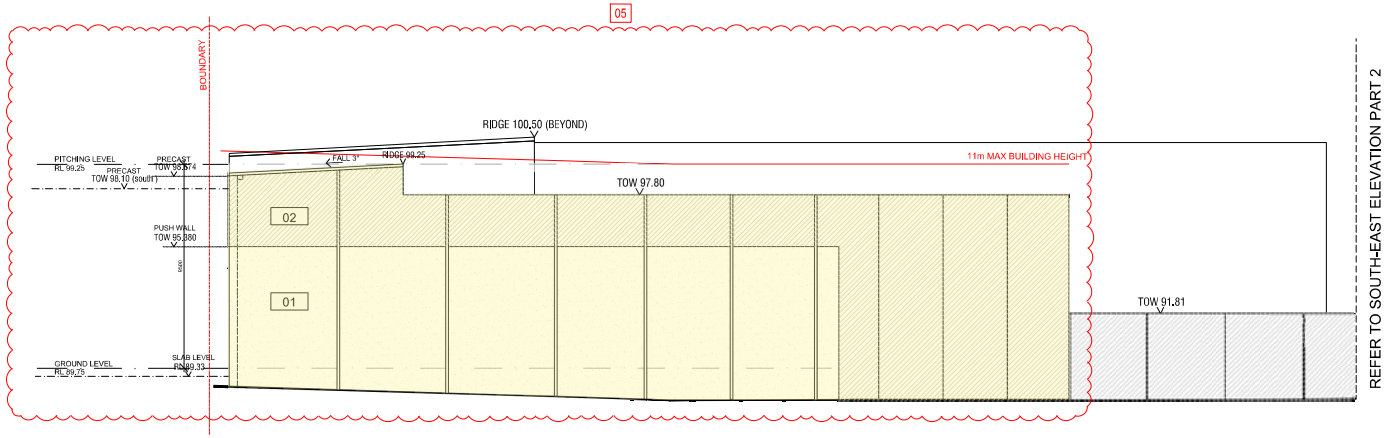
FOR DA APPROVAL

J15306 (job no.) DA 101 (drawing no.) K (rev)



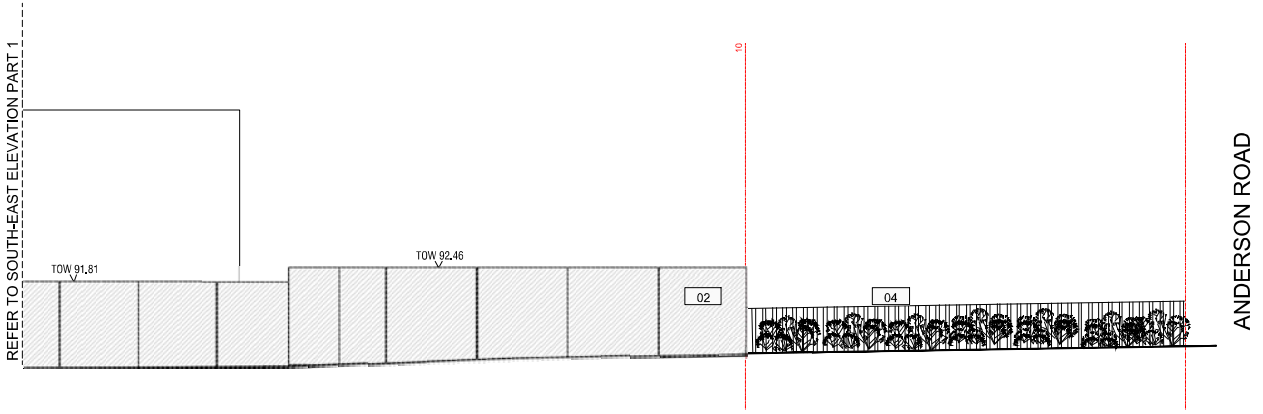
SOUTH ELEVATION

SCALE 1:250



SOUTH-EAST ELEVATION (PART 1)

SCALE 1:250



SOUTH-EAST ELEVATION (PART 2)

SCALE 1:250

REFERENCES

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EXTENT MODIFICATIONS

MODIFICATIONS TO APPROVED SSD 7424 (MOD2)

05

- FULL HEIGHT CONCRETE WALLS REPLACED WITH CONCRETE PUSH WALLS OF 350mm THICK AND 150mm THICK CONCRETE PRECAST PANELS ON TOP. FOR DETAILS REFER TO STRUCTURAL ENG'S DRAWINGS.

MATERIAL LEGEND

01	CONCRETE PUSH WALLS COLOUR: CONCRETE
02	CONCRETE PRECAST PANELS COLOUR: CONCRETE
03	COLORBOND FENCE COLOUR: BASALT / DULUX
04	PALISADE FENCE COLOUR: TO MATCH BASALT / DULUX
05	COLORBOND ROOF COLOUR: SHALE GREY

EXTERNAL WALLS OF THE RECEIVABLES & PICKING LINE, INCLUDING ALL COMPONENTS INCORPORATED IN THEM ARE NON- COMBUSTIBLE.

revision
J 21.12.23 Issue for Approval

notes
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Project Architect

LZ - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.chaninedesign.com.au

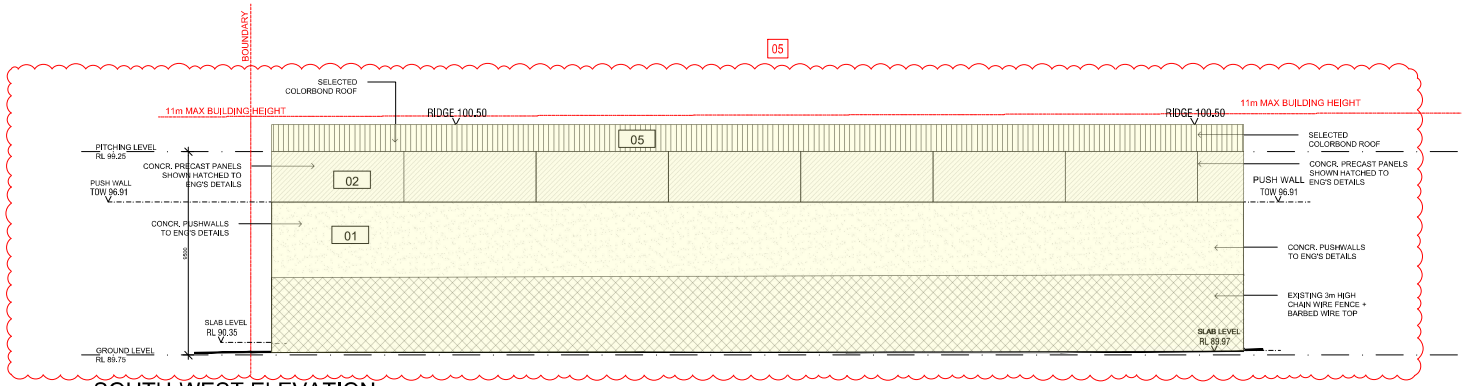
date APRIL 2013 | drawn SS

project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
ELEVATIONS 1

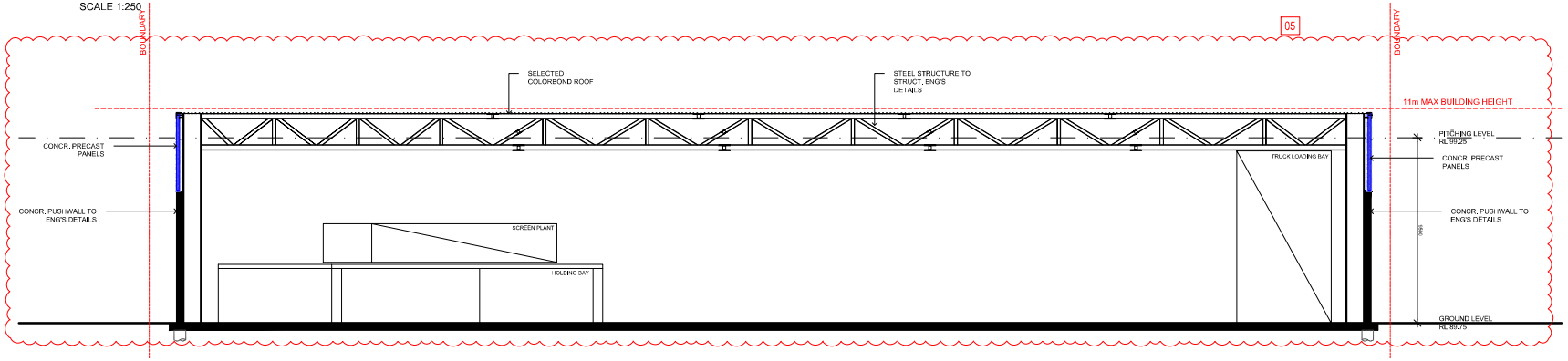
FOR DA APPROVAL

job no.		drawing no.	rev
J15306	DA	200	J



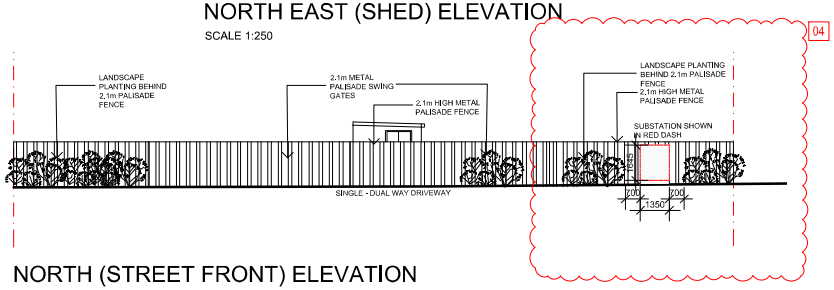
SOUTH-WEST ELEVATION

SCALE 1:250



NORTH EAST (SHED) ELEVATION

SCALE 1:250



NORTH (STREET FRONT) ELEVATION

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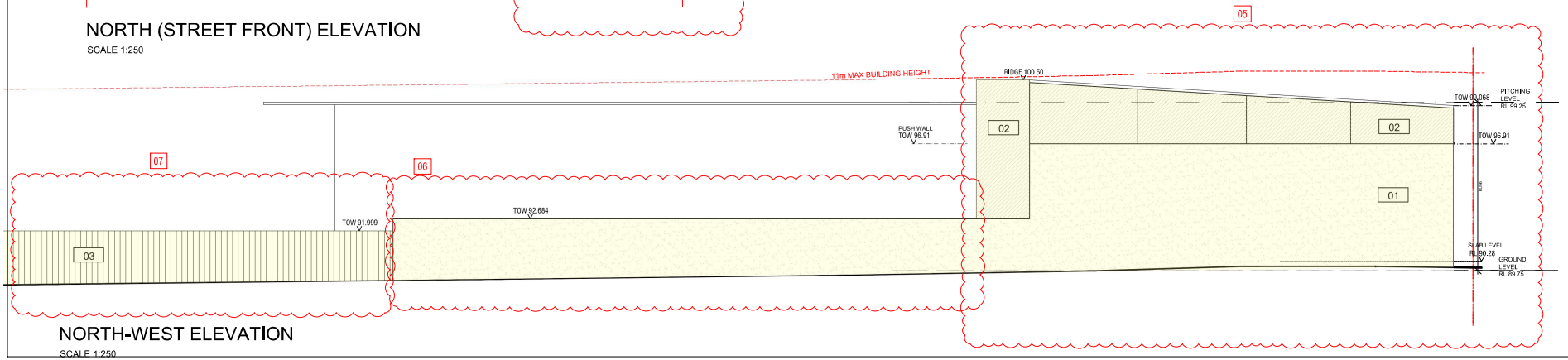

NORTH-WEST ELEVATION

SCALE 1:250

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS

EXTENT MODIFICATIONS

MODIFICATIONS TO APPROVED SSD 7424 (MOD2)

04.ELECTRICAL SUBSTATION PROVIDED (REFER TO ENG'S DETAILS)
05.FULL HEIGHT CONCRETE WALLS REPLACED WITH CONCRETE PUSH WALLS OF 350mm THICK AND150mm THICK CONCRETE PRECAST PANELS ON TOP. FOR DETAILS REFER TO STRUCTURAL ENG'S DRAWINGS.
06. CONCRETE PANELS REPLACED WITH CONCR. PUSH WALL 350mm THICK.
07 . CONCRETE PANELS REPLACED WITH COLORBOND FENCE AT PARKING AREA

MATERIAL LEGEND

01	CONCRETE PUSH WALLS COLOUR: CONCRETE
02	CONCRETE PRECAST PANELS COLOUR: CONCRETE
03	COLORBOND FENCE COLOUR: BASALT / DULUX
04	PALISADE FENCE COLOUR: TO MATCH BASALT / DULUX
05	COLORBOND ROOF COLOUR: SHALE GREY

EXTERNAL WALLS OF THE RECEIVABLES & PICKING LINE, INCLUDING ALL COMPONENTS INCORPORATED IN THEM ARE NON- COMBUSTIBLE.

revision
J 21.12.23 Issue for Approval

notes
All dimensions and setouts to be verified prior to commencement
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scale 1:100 @ A3

Project Architect

L2 - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.channedesign.com.au

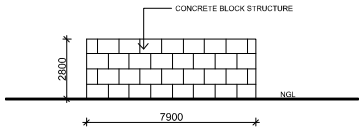
date APRIL 2013
drawn SS

project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
ELEVATIONS 2

FOR DA APPROVAL

J15306 job no. | DA | 201 drawing no. | J rev



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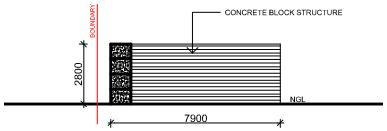
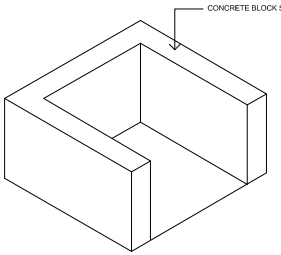


SECTION A
SCALE 1:250



ISOMETRIC VIEW
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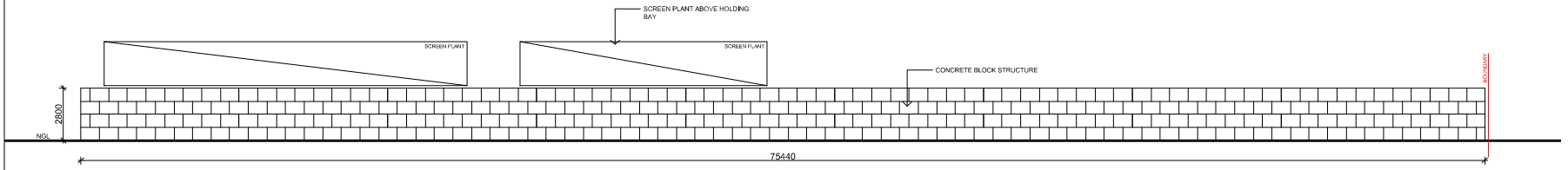

SOUTH ELEVATION
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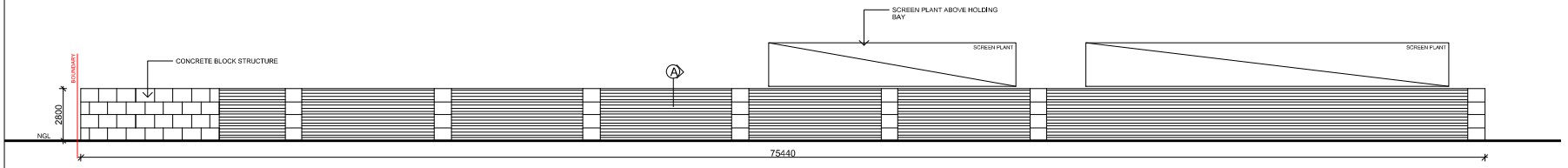

NORTH ELEVATION
SCALE 1:250

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS

EXTENT MODIFICATIONS

MODIFICATIONS TO APPROVED SSD 7424 (MOD2)

NO CHANGES TO SHEET

revision

notes
All dimensions and setouts to be verified prior to commencement
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scale 1:100 @ A3

Project Architect

LZ - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.chaninedesign.com.au

date APRIL 2013
drawn SS

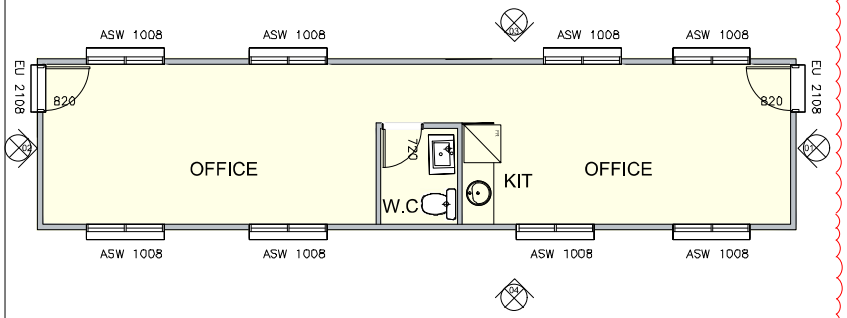
project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
DETAILS SHEET 1

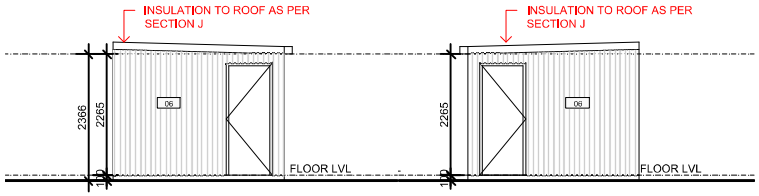
FOR DA APPROVAL

J15306 DA 500 G

job no. drawing no. rev

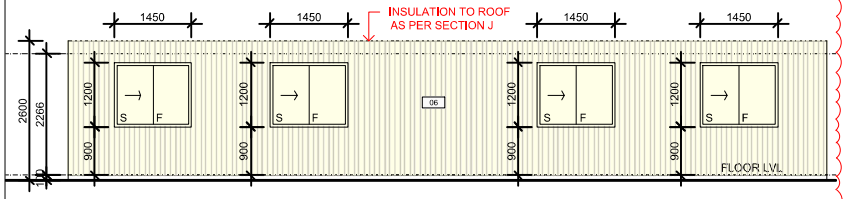


PLAN (OFFICE)
SCALE 1:100



ELEVATION 01 (OFFICE)
SCALE 1:100

ELEVATION 02 (OFFICE)
SCALE 1:100



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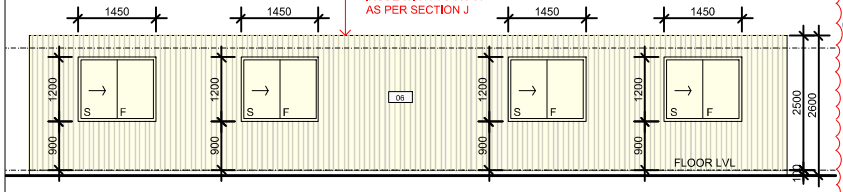

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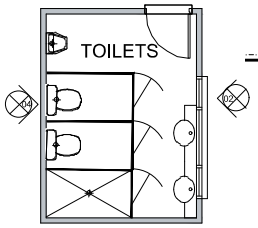

PLAN (TOILETS)
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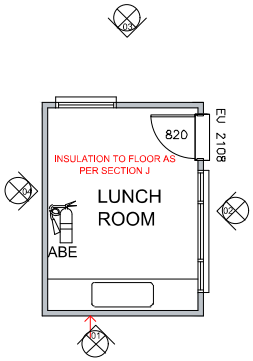
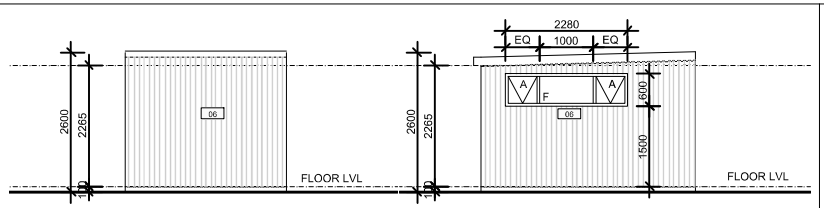


LUNCH ROOM
SCALE 1:100

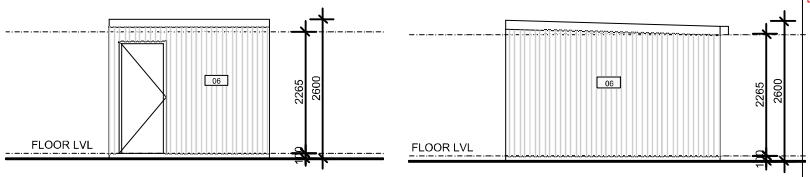
REFER TO A503

DIS TOILET
SCALE 1:100



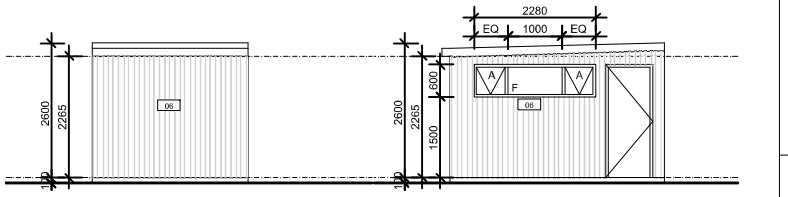
ELEVATION 01 (TOILETS)
SCALE 1:100

ELEVATION 02 (TOILETS)
SCALE 1:100



ELEVATION 03 (TOILETS)
SCALE 1:100

ELEVATION 04 (TOILETS)
SCALE 1:100



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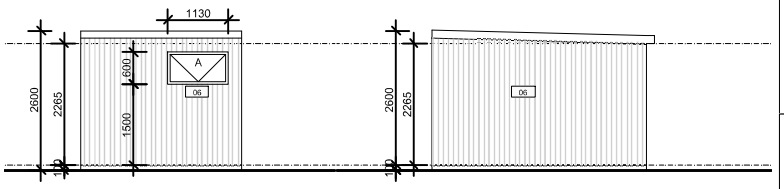
SCALE 1:100

ELEVATION 02 (LUNCH RM)
SCALE 1:100



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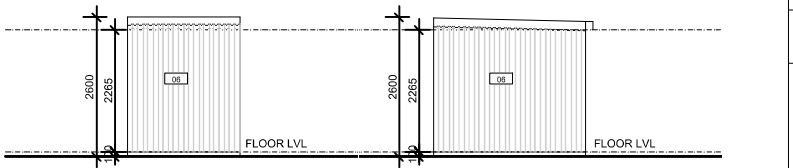
SCALE 1:100

ELEVATION 04 (LUNCH RM)
SCALE 1:100



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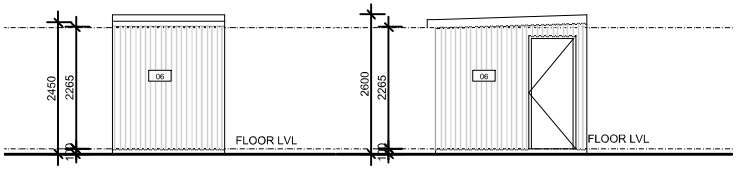
SCALE 1:100

ELEVATION 02 (DIS TOILET)
SCALE 1:100



ELEVATION 03 (DIS TOILET)
SCALE 1:100

ELEVATION 04 (DIS TOILET)
SCALE 1:100

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS

EXTENT MODIFICATIONS

MODIFICATIONS TO APPROVED SSD 7424 (MOD2)

01
- RECONFIGURED WEIGHBRIDGE OFFICE AND PARKING SPACE

revision
H 21.12.23 Issue for Approval

notes
All dimensions and setouts to be verified prior to commencement
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Project Architect

LZ - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.channeldesign.com.au

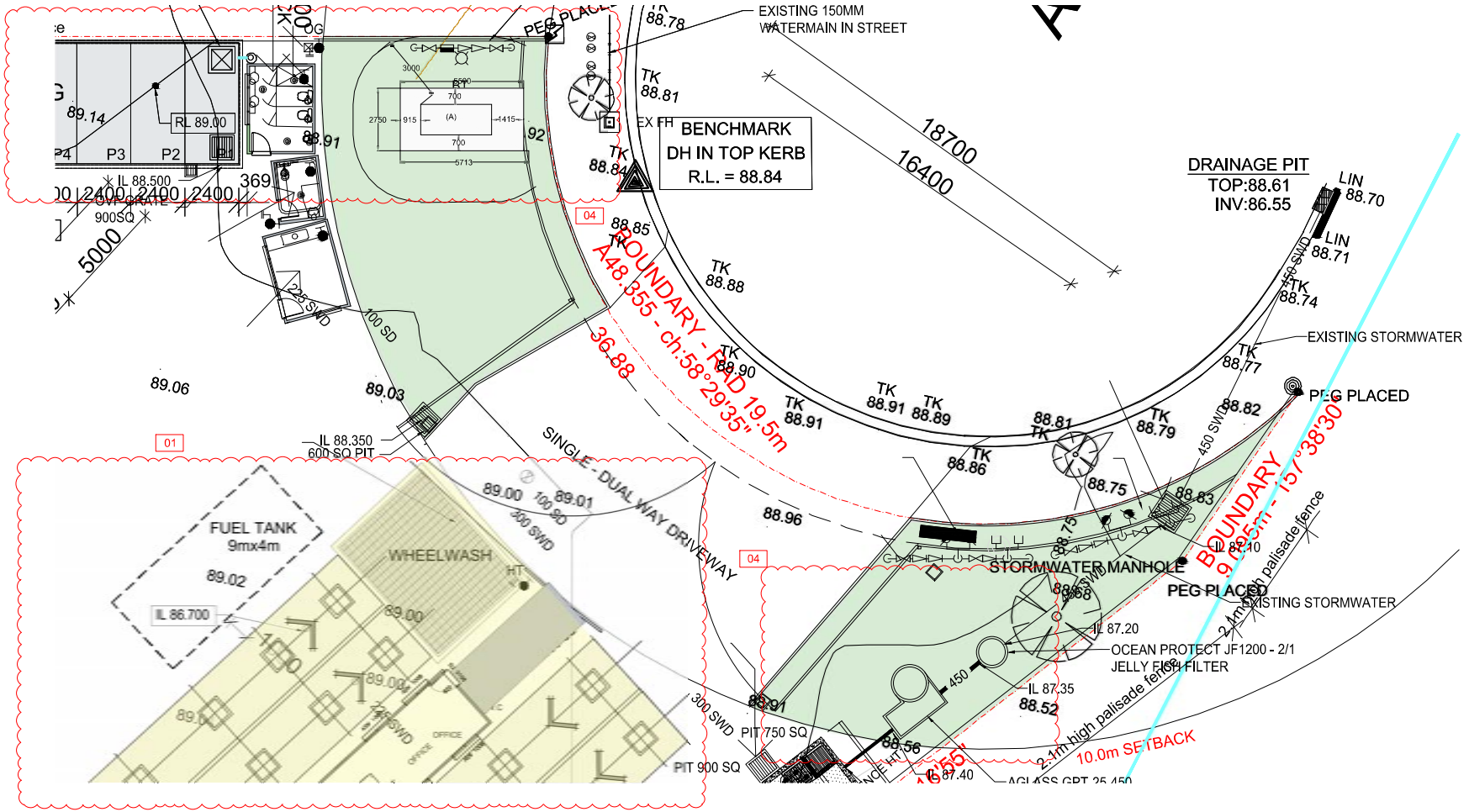
date APRIL 2013
drawn SS

project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
DETAILS SHEET 2

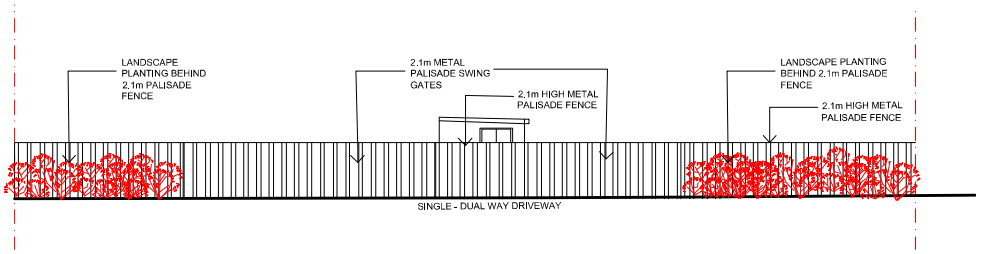
FOR DA APPROVAL

J15306 job no. | DA | 501 drawing no. | H rev



FRONT FENCE DETAIL PLAN

SCALE 1:200



FRONT FENCE ELEVATION

SCALE 1:200

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- REPOSITION OF WHEEL WASH
- RECONFIGURED WEIGHBRIDGE OFFICE AND PARKING SPACE

04
HYDRAULIC & STORMWATER DESIGN, MODIFIED, ELECTRICAL SUBSTATION PROVIDED (REFER TO ENG'S DETAILS)

revision
I 21.12.23 Issue for Approval

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LZ - 60 PARK STREET
SYDNEY NSW 2000
P: 02 9267 2000
W: www.chaninedesign.com.au

date APRIL 2013 | drawn SS

project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
FRONT FENCE DETAIL PLAN

FOR DA APPROVAL

J15306 (job no.) DA 502 (drawing no.) I (rev)

Australia

SYDNEY
Ground floor 20 Chandos Street
St Leonards NSW 2065
T 02 9493 9500

NEWCASTLE
Level 3 175 Scott Street
Newcastle NSW 2300
T 02 4907 4800

BRISBANE
Level 1 87 Wickham Terrace
Spring Hill QLD 4000
T 07 3648 1200

CANBERRA
Suite 2.04 Level 2
15 London Circuit
Canberra City ACT 2601

ADELAIDE
Level 4 74 Pirie Street
Adelaide SA 5000
T 08 8232 2253

MELBOURNE
Suite 9.01 Level 9
454 Collins Street
Melbourne VIC 3000
T 03 9993 1900

PERTH
Suite 3.03
111 St Georges Terrace
Perth WA 6000
T 08 6430 4800

Canada

TORONTO
2345 Yonge Street Suite 300
Toronto ON M4P 2E5
T 647 467 1605

VANCOUVER
422 Richards Street Unit 170
Vancouver BC V6B 2Z4
T 604 999 8297

CALGARY
606 4th Street SW 11 Floor
Calgary Alberta T2P 1T1

linkedin.com/company/emm-consulting-pty-limited

emmconsulting.com.au