Traffic Management Plan

Visy Pulp & Paper Tumut Mill

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VISY
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1.0 Introduction

1.1 Background

Visy Pulp and Paper Tumut (VPP) is a fully integrated unbleached Kraft Pulp and Paper Mill, located approximately 8 km west of Tumut and 7 km east of Adelong in the South West Slopes region of New South Wales. Development Approval for the project was obtained on the 29th November 1998 pursuant to the provisions of the *Environmental Planning and Assessment Act* 1979. This consent, subject to over 105 individual conditions, was issued for existing operations with capacity of up to 300,000 tonnes per year (tpy) and increase of up to 450,000 tpy for the future mill expansion.

In May 2006, Visy wrote to the Minister for Planning seeking a further increase to the future Mill expansion of up to 700,000 tpy. As this increase was substantially greater than the 450,000 tpy that was originally approved, Visy was required to prepare an Environmental Assessment for the proposed expansion.

The Visy Tumut Expansion Environmental Assessment for the 700,000 tpy was prepared and submitted to the Minister for Planning in February 2007 and approval was granted by the Minister in May 2007 pursuant to the provisions of Section 75J of the *Environmental Planning and Assessment Act* 1979. This approval was granted subject to Concept and Project Approval Conditions issued in Schedule 2 of the approval dated 1 May 2007. Visy sought further modification to this approval in June 2007 (ref. Mod 2007) that considered Project Component Phasing Changes. The Project Component Phasing was approved under the Modification to the Instrument of Approval (06_0159 Mod 1) in August 2007.

In December 2016, Visy submitted a development modification application accompanied by an Environmental Assessment for the maximum production tonnage limit increase. Approval was granted on the 7 July 2017 by the NSW Department of Planning & Environment for the maximum production tonnage limit increase to 800,000 tonnes per year (tpy).

The Visy Traffic Management Plan (TMP) for Stage 1 was prepared in accordance with Development Consent Condition 50. Under the current Project Consent Approvals (Condition 5.4d), Visy are required to prepare an updated TMP to cover specific items related to the expansion in consultation with the NSW Road Traffic Authority, Tumut Shire Council and for the approval of Minister for Planning. This updated TMP has been prepared in accordance with these Project Approval Conditions and specifically covers the Project Component Phasing under 1a. Subsequent phases will be covered under future updates to this TMP.

1.2 Overview of Assessments

During the assessment for the Environmental Impact Study 1998 (EIS 1998) for the initial development, a detailed Traffic and transport impact assessment was undertaken. This included a review of the local and regional road network and the South west slopes Timber industries Haulage study prepared in 1990 and updated in 1995 and traffic numbers predicted in the Environmental Impact Statement (EIS) 1998 and truck numbers recorded at the site weighbridge.

The review of the local and regional road network, detailed Level of Service which is a qualitative measure developed by Austroads. Austroads is the national association of road transport and traffic authorities in Australasia and works towards uniformity of practice in respect to design, construction and user aspects of roads and bridges. Austroads defines Level of Service as a qualitative measure describing operational

conditions within a traffic stream, and their perception by motorists and/or passengers. The term, Level of Service (LOS) and its characteristics for rural roads is defined below in Table 1.0, from Table 3.3 Traffic Impact Assessment, Appendix Q, Environmental Assessment, 2007.

Table 1.0 Level of Service (LOS) rural roads

Level of Service (LOS)	Description	AADT	Description
A	Free unrestricted flow	1,100	Very good
B	Mostly free flow, few disruptions	2,800	Very good
C	Stable flow	5,200	Good
D	Mostly stable flow, some delays	8,000	Acceptable
E	Congested flow. Delays common.	14,800	Bad
F	Forced flow	n/a	Bad

From Traffic Assessment Report Table 3.3. p. 7. from Environmental Assessment 2007.Source: AUSTROADS Guide to Traffic Engineering Practice Part 2, Table 3.9. AADT = Annual Average Daily Traffic

The ability of a given road to safely and efficiently carry traffic is measured as its Level of Service with LOS A being the best and LOS F being the worst. The term, Level of Service for intersections as described in Table 1.0 is based on an 'average' delay imposed on a vehicle wishing to undertake a specific manoeuvre. Level of Service decreases with increasing traffic volumes. LOS A, LOS B, LOS C and LOS D in a rural context are all satisfactory.

It should be noted that there is no generally recognised link between LOS and safety. For instance it can be argued that (using the definitions in Table 1.0 above) an LOS A road is safer than a LOS E road because there is less traffic. This can be countered by the argument that an LOS E road creates a state of heightened alertness in drivers compared to an empty road and therefore increases safety. This can again be countered by a statement that the increased frustration of drivers will cause a greater willingness to take risks, then a statement that an LOS E road will generally have lower speeds can be made and so on.

The Level of Service with the increased traffic attributed to Stage 2 was assessed during the Environmental Assessment in 2007 and the data is presented below in Table 2.0. The regional roads are currently operating at Levels of Service (LOS) ranging from A to C. The Snowy Mountains Highway at Talbingo is LOS A (Very Good) as shown below in Table 2.0.

Batlow Road, Snowy Mountains Highway between Adelong and Batlow Road, Bombowlee Road and Gocup Road are operating at LOS B (Very Good). The Snowy Mountains Highway on the western approach to Tumut is operating at a LOS C (Good). These are considered appropriate levels of service for these major regional roads.

Table 2.0 Level of service on regional roads current and predicted for Stage 2 (Phase 1)

Route	ADT (2003)	Estimated Phase 1 extra Visy heavy vehicles	Predicted ADT including Stage 2 expansion (Phase 1)*	Level of Service Existing/Predicted
via SMH – Adelong	1359	51	1618	LOS B/B
via Batlow Rd – Wondalga	1568	69	1876	LOS B/B
via Gocup Rd - Gundagai	1692	81	2029	LOS B/B
via Bombowlee Rd – Buccleuch	1775	-5	2058	LOS B/B
via SMH –Talbingo	537	0	623	LOS A/A

From Table 3.12 and 4.2. Traffic Impact Assessment, Appendix Q, Environmental Assessment, 2007.

ADT – Average daily traffic

*Including 5 year's cumulative growth in ADT (at 3%) plus new Visy vehicles, less 3% growth of current Visy HV numbers as this is included already in natural growth.

The assessment concluded that the Level of Service (LOS) on the main transport routes after the expansion is predicted to be within the standards expected of rural roads, Table 2.0.

Comparisons of heavy vehicle traffic movement to those predicted in the EIS (1998), as reported in the Environmental Assessment in 2007 show that heavy vehicle traffic volumes to and from the site were typically 40% less than predicted in the EIS mainly due to increased utilisation of B-doubles and back-loading, Tables 3.0 and 4.0.

Table 3.0 Traffic Movements; 2005 - 2006 existing actual Visy related two way daily truck movements

Route	Existing Actual Two Way Daily Truck Movements
Via Snowy Mountains Highway – Adelong	40
Via Batlow Road – Wondalga	67
Via Gocup Road – Gundagai	43
Via Bombowlee Creek Road – Buccleuch	63
Via Snowy Mountains Highway – Talbingo	1
From Tumut Township	65
TOTAL	279

From Environmental Assessment, Visy Pulp and Paper 2007, Table 13.p. 56 based on 2005 – 2006 data. Actual truck movement data taken from weighbridge records for the year 2005 – 2006

Table 4.0 Two way truck movements - existing 2005-2006 actual and orginal EIS predictions

	Existing Actual	Original EIS Estimate*
Two Way Daily Traffic Movements	279	410

* The Stage 1 EIS predicted maximum one way daily loaded truck volume to and from the mill was 205 trucks/day. An estimate of the two way movements with no back loading was obtained by doubling this number.
From Environmental Assessment Visy Pulp and Paper 2007, Table 14, p.56 based on actual weighbridge data for 2005 – 2006.

During the subsequent traffic impact assessment for the Visy Expansion *(Refer Visy Pulp and Paper Proposed Mill Expansion Final Environmental Assessment January 2007, Appendix Q)*, the predicted additional daily heavy vehicle movements are 209 for Phase 1 and 252 for Phase 2.

The Traffic Management Plan outlines Visy's Objectives and Performance Outcomes for Traffic management.

A truck noise impact assessment for the Visy Expansion *(Refer Visy Pulp and Paper Proposed Mill Expansion Final Environmental Assessment January 2007, Appendix Q)* was also undertaken. The predicted traffic noise impacts were assessed against current road traffic noise criteria established by the NSW DECCW. The assessment established that traffic noise already exceeds the above criteria in some locations along the main transport routes and that the increase in truck noise resulting from the Visy expansion, providing management measures are in place, is not considered excessive. This management plan identifies the measures being adopted for reducing truck noise impacts along these major routes.

1.3 Environmental Management System

The Traffic Management Plan is a component of the site's Environmental Management System (EMS), certified to ISO 14,001:2015. The Environmental Management System consisting of the Operation Environmental Management Plans, operational and environment procedures, and detailed monitoring and auditing program aims to maintain compliance with Environmental regulations and achieve best-practice standards through a system of continual improvement, as represented below in Figure 1.0.

The EMS is integrated with the site's Safety and Quality management systems which are both certified to the relevant standards (i.e. ISO 9001:2015, ISO 45001:2018).

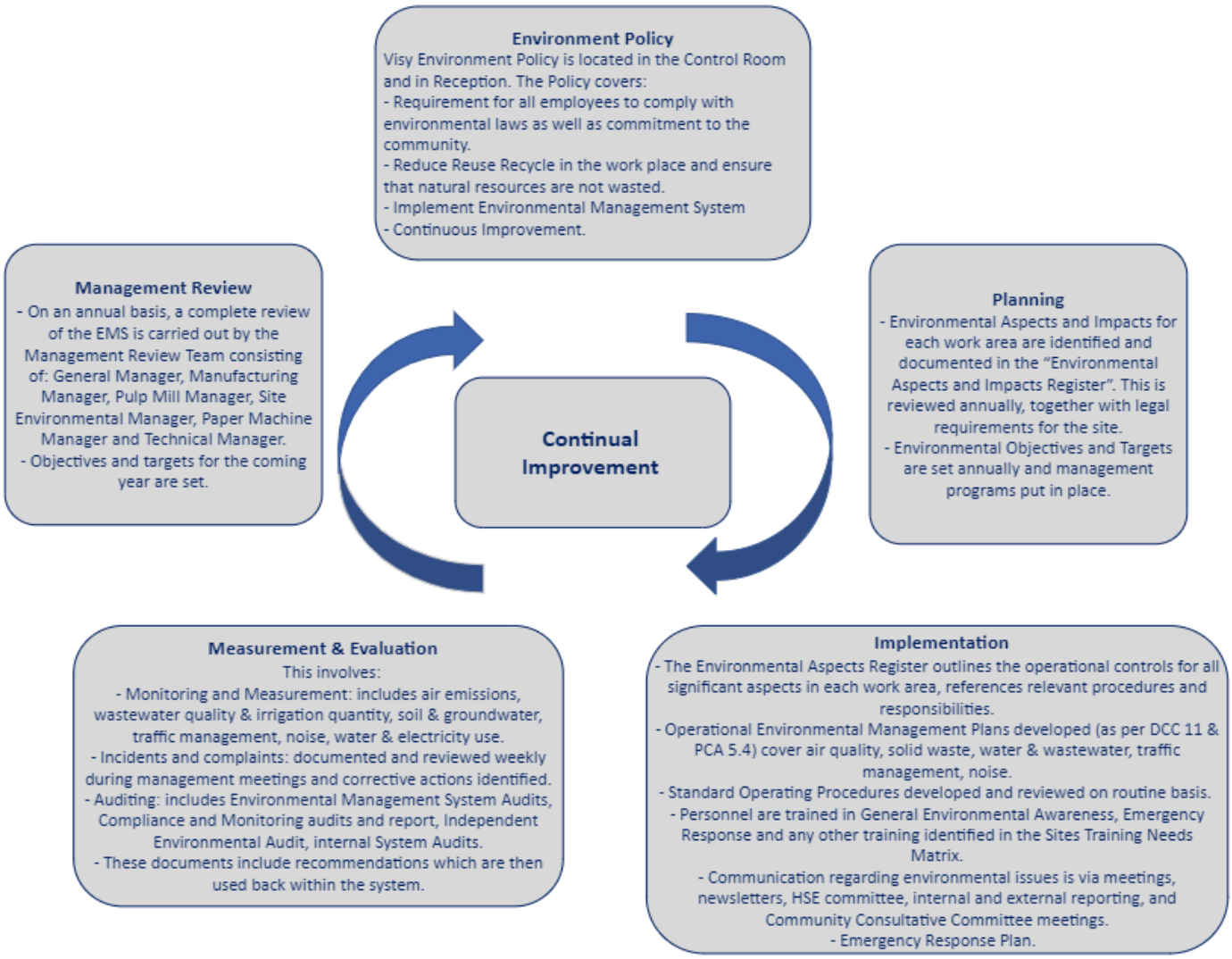

Figure 1.0 Overview of site Environmental Management System (EMS) Continual Improvement

2.0 Legal Requirements

2.1 Environmental Planning and Assessment Act 1979

The NSW legislation for granting of development approval for the Visy Mill Development is the *Environment Planning and Assessment Act* 1979. Approval of the initial Development (Stage 1) was granted under *section 91AB(2)* of the Act. Approval was granted subject to meeting the Development Consent Conditions under approval S96/00598. The subsequent Visy Tumut Mill Expansion Development was granted under Part 3A. This approval was granted subject to meeting the Concept and Project Approval Conditions under approval 06_0159.

The statutory requirements which apply to the Tumut site are:

- Documents as listed under Condition 1 of Development Consent Conditions for the initial development(S96/00598 DCC);
- Additional documents as listed under Condition 2 of Development Consent Conditions for the modified development(S96/00598 DCC_ MOD -45-5-2003-1);
- Environment Protection Licence (Licence No. 10232);
- Documents as listed under Condition 1.1 of Project Approval Conditions for the Expansion (06_0159 PA);
- Documents as listed under Condition 1.1 Concept Approval Conditions for the Expansion (06_0159 CA);
- Statement of Commitment Stage 2 (April 2007).
- Documents as listed under Condition 1.1 Modification Approval for the Expansion (06_0159 Mod 1).

2.2 Other Relevant Legislation and Regulations

Regulations concerning traffic management relevant to this site are contained within the following legislation and standards:

- *Environmental Planning and Assessment Amendment Act 2012;*
- *Protection of the Environment Operations Act (1997)*;
- *Dangerous Goods (Road and Rail Transport) Act* 2008
- *Occupational Health and Safety Amendment (Dangerous goods) Act*, 2003
- Road Safety (Mass, Loading and Access) Regulations 2005 (New South Wales)
- *Road Transport Act, 2013 (New South Wales)*
- *Road Safety Act 1986* (Victoria)
- *Queensland Transport Operations (Road Use Management) Act 1995 (Queensland)*
- Transport Operations (Road Use Management – Mass, Dimension and Loading) Regulations 2005 (Queensland)
- *Road Traffic Act 1961 (South Australia)*
- Road Traffic (Vehicle Standards) Regulations 2002 (Western Australia)
- Load Restraint Guide, Third Edition 2018, NTC.

3.0 Objectives and Performance Outcomes

The objectives and performance outcomes for Traffic Management are described below, Table 5.0.

Table 5.0 Objectives and performance outcomes

Objectives	Performance Outcomes
• To comply with all site, regulatory and statutory requirements. • To minimise traffic impacts on the community and surrounding environment. • To minimise road traffic incidents/accidents related to transport of raw resources or products. • To maintain amenity for residents in localities along major transport routes on local and regional roads. • To keep the local community and regulators informed of any accidents/incidents and to respond quickly and effectively to issues. • To undertake monitoring in accordance with requirements of the Consent Conditions. • To review the number of truck movements to reduce noise related impacts.	• All heavy vehicle transport operators arriving on site undergo a Site Induction course to inform them of the Site's environmental and safety requirements. • All truck movements to and from site are recorded. • All loads are properly lashed and secured. • All heavy vehicle traffic accidents and /or complaints from the general public are reported to the Visy Logistics Transport Manager or Visy complaints hot line and entered into the Noggin system. • Actions are undertaken to quickly and effectively respond to any incidents or complaints. • All heavy vehicle transport operators are to have appropriate licences and competency to operate vehicles. • All hazardous chemicals are transported along the designated routes. • Undertake Traffic noise assessments along major transport routes. • Monitor and review traffic movements and resident noise monitoring undertaken along traffic routes as per EA, 2007. • Participation/involvement with council/industry groups to secure funding for road network upgrades as undertaken currently.

4.0 Traffic Issues Management

4.1 Assessment of Local and Regional Road Capacity

A detailed traffic and transport assessment was prepared by Maunsell Australia for the mill expansion during the EA (2007). The detailed assessment assessed the proposed expansion against impacts of increased traffic generation on:

- Level of Service of local roads
- traffic accidents and safety
- public transport
- footpath network and;
- car parking

The major haulage routes on local and regional roads are shown below in Figure 2.0.

The major routes for transporting of finished paper products are:

- *Snowy Mountains Highway via Adelong*. This is primarily for routes to Melbourne and Adelaide.
- *Gocup Road via Tumut/ Gundagai*. This is primarily for routes to Sydney and Brisbane, and also for transport to Melbourne during the night time curfew (10pm to 7am) on Snowy Mountains Highway through Adelong as per Development Consent Condition 47.

The major resource product transport routes are:

- *Batlow Road via Wondalga*. This route is for transporting of sawmill chips and bark and pulp logs from Tumbarumba area;
- *Gocup Road via Tumut/ Gundagai*. This route is for transporting of forest residue and pulp logs from ACT, Monaro and Macquarie regions, chemicals and recycled paper from Sydney via Hume Highway;
- *Bombowlee Creek Road via Wee Jasper Road*. This route is for transporting of pulp logs from Tumut plantation areas;
- *Snowy Mountain Hwy via Tumut/Talbingo*. This route is for transport of sawmill residue from Tumut area and returns to Monaro region; and
- *Snowy Mountains Highway via Adelong.* This route is for the transport of recycled paper and chemicals from Melbourne.

The traffic assessment in Appendix Q of the EA found that with the additional traffic movements, the level of service of the road network servicing the mill will be mostly within Level of Service (LoS) “B” with some having LoS “A” and “C”. The rating given in this assessment is considered acceptable and within the standards expected of regional roads.

The Traffic management plan has been prepared to address the Development Consent Conditions and the Project Approval Conditions and to identify management measures to reduce environmental impacts from heavy vehicle traffic impact. Visy acknowledges that Gocup Road which is a major road linking Tumut to the Hume Highway was in need of substantial funding to bring the road to a satisfactory standard and were fully

supportive of Snowy Valleys Council in its dealings with both State and Federal government in successfully seeking funding to upgrade this road, which was completed in 2019.

4.2 Traffic Safety

The main road networks in the Tumut region, due to the vast plantation timber forestry and processing industries, carry a high proportion of heavy vehicles. Some of these haulage routes take product directly through townships and communities and share the road with other traffic which include private and commercial vehicles, and school buses. The increased heavy vehicle traffic resulting from the proposed Visy Expansion was the main concern from the community during the Environmental Assessment.

Accident statistics, presented in Table 3.5 in Appendix Q of the Environmental Assessment, compares the number of accidents in the 5 years prior to Visy commencing operations and against those that have occurred in the 4 years after. The table shows there is no change in the annual average number of accidents over all roads in the Tumut Shire Local Government Area (LGA). Of the total numbers of accidents recorded in the Tumut Shire, 39.6 per annum occurred along the major routes utilised by Visy trucks prior to the mill starting up in 2000. This increased to 45.8 per annum since the mill started. The assessment concluded that additional traffic was unlikely to significantly impact on safety. There is evidence to indicate that there is a general slight upward trend in overall crash numbers and a decrease in some elements of the crash statistics. However there was no direct evidence to indicate that the presence of the mill has contributed to these crashes and the overall change is in line with growth in the region. The involvement of heavy vehicles in fatal crashes had declined in recent years since the opening of the mill. The program of upgrades for the regional roads of the Southwest Slopes has been progressively addressing ‘black spots” and slow spots in the network.

As part of contractual arrangements all dispatch contractors are required to submit a Duty of care plan which documents how they will manage driver fatigue, hours of driving, enforcement of rest breaks, driver training and maintenance of all licence requirements.

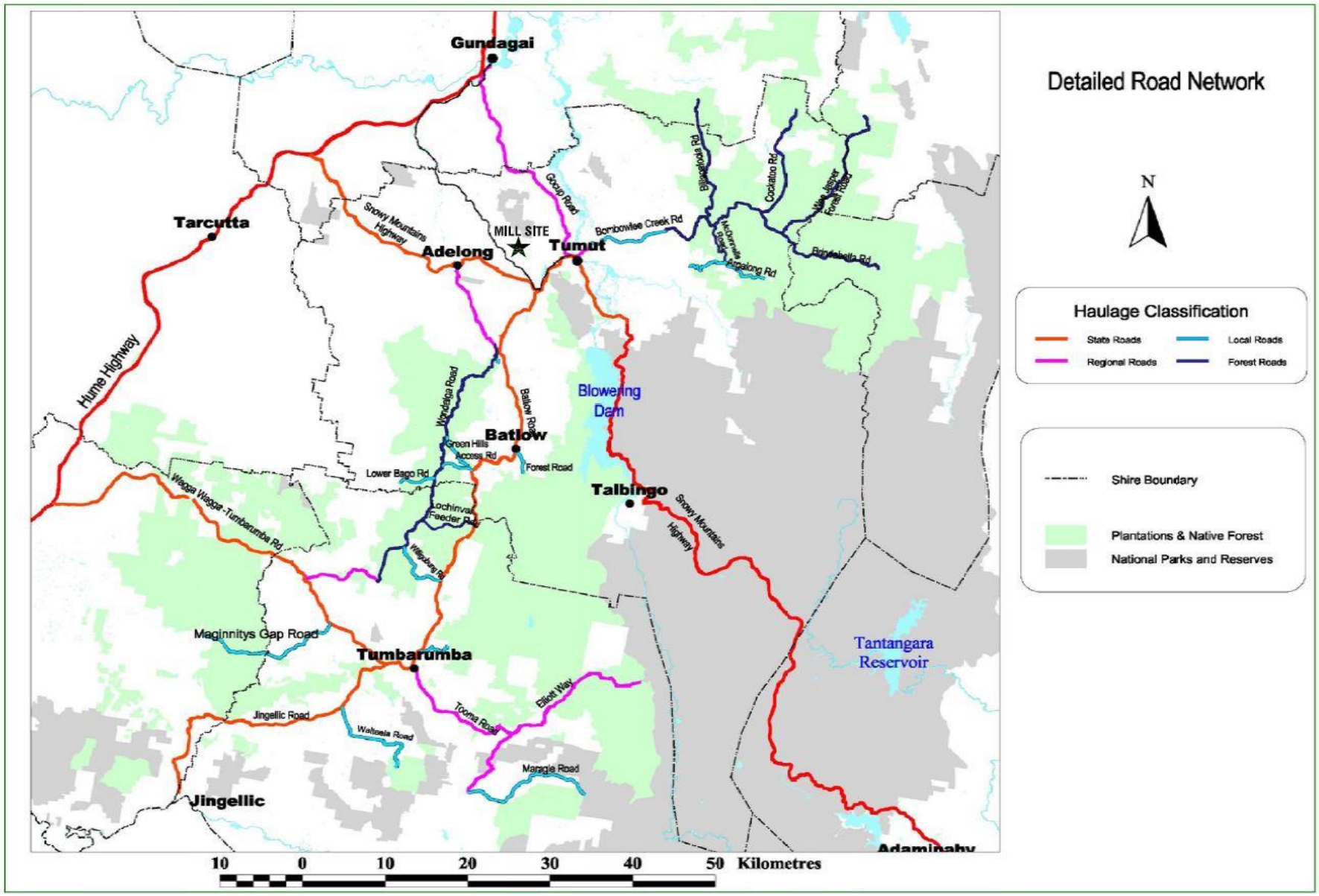

Figure 2.0 Major Haulage Routes

All resources contractors are required to be accredited under RMS mass management module of the National Heavy Vehicle Accreditation Scheme. Initially a haulage company must gain accreditation and then ongoing certification by demonstrating and supplying supporting documentation in relation to truck weights both loaded and unloaded, driver training, and maintenance of log books. This is a system that requires ongoing self-management and quarterly self - reporting and following initial accreditation, external auditing by certified auditors every two to three years with reports submitted to the RMS.

Traffic safety is also addressed through training of haulage operators, participation in industry organisations, e.g. Forestry Industry Council to improve standards within timber industry that includes haulage (see Section 6.5). In addition a Haulage Site Safety plan is prepared for each forestry operation, see Section 6.1.2.

Other issues that have a potential to result in traffic safety risk on the road network system from the operation of heavy vehicles are from:

- Inadequate load restraining;
- Overloading or unevenly distributed load;
- Excessive speeds;
- Driver fatigue;
- Operating Restricted Access Vehicles (i.e. B-doubles, Road Trains) along routes that have not been gazetted for heavy vehicle; and
- Deterioration of the surface condition of parts of the road network.

4.3 Truck Noise Impacts

A traffic noise impact assessment was undertaken as part of the requirements for development of a green-fields site in the original EIS in 1996. This was undertaken in accordance with, the guidelines provided in the then *NSW EPA Environmental noise control manual* and draft *DUAP Assessment of noise vibration and blasting impacts*, and discussions with the then EPA.

The *NSW EPA Environmental noise control manual* stipulates that normal movement of trucks is preferred between the hours of 7am to 6pm Monday to Friday. Where night time truck movements are required for the viability of an industrial activity, compliance with traffic noise criteria and sleep disturbance criteria are necessary. Therefore traffic count data and predicted maximum traffic numbers and corresponding traffic noise levels were modelled for the areas adjacent to the Snowy Mountains Highway (and specifically Adelong and Tumut) and Batlow Road.

The subsequent Development Consent Conditions included specific requirements in relation to traffic generated noise and included:

DCC 47: no night time movements (10pm to 7am) semi-trailer or B double truck movements to and from the plant via the Snowy Mountains Highway through Adelong, except where, on the advice of the Director General in consultation with the Council, such a restriction poses unacceptable impacts on alternative routes;

DCC 50: preparation and implementation of a Traffic Management Plan with (b) requirements to document measures to reduce sleep disturbance impacts in built in areas including reduced speed limits, prohibition on the use of exhaust brakes, and the provision of air bag suspension to heavy vehicles.

A truck noise impact assessment was undertaken during the EA 2007 (Appendix 0, Visy EA 2007), to assess the noise impacts from additional heavy vehicle movements to residents living along or adjacent to major arterial routes. It was conducted by applying the *NSW DEC, 1999: Environmental criteria for road traffic noise*. The assessment involved measuring the existing levels of road traffic noise, using noise monitors, at a number of residential locations along each of the main truck routes to the mill site and to the destinations of the finished product, Table 6.0. Predicted levels of traffic and traffic noise were then calculated at typical residences along the major transport routes and compared to these criteria. The assessment was based on predicted day and night daily traffic movements for each of the designated routes. A total of nine residential locations were selected during the assessment along the major routes, to undertake background noise measurements, Table 6.0.

The assessment, which included monitoring of existing traffic noise conditions, indicated that noise levels at two locations along some of the major haulage routes are already over the DEC threshold criteria and further predicted that the increased noise levels due to additional heavy vehicle traffic along these roads, would result in noise levels above the threshold at a third location. The residences where monitoring was undertaken were chosen due to their proximity to the major roads associated with the delivery of raw materials and finished product and the residence locations are provided below, Table 6.0 and Figure 3.0.

Table 6.0 Traffic noise monitoring locations

Residence	Location
“Sullivan”	Adelong - Snowy Mountains Highway to Hume Highway
“Kelly”	Wondalga Road, (on way to Tumbarumba)
“Dallas” and “Barton”	Gocup Road, (on way to Gundagai, Hume Highway)
“Thompson”	Bombowlee Road, (on way to plantation forests north of Tumut, Buccleuch Forest)
‘Steunkal”, “Beale”	Snowy Mountains Highway towards Tumut from mill site
“Glengarry”	Snowy Mountains Highway towards Adelong from mill site
“Michael”	Snowy Mountains Highway, western edge of Tumut

Note that no Visy related trucks travel through Adelong at night, between the hours of 10pm – 7am as per DCC 47.

The Traffic noise impact assessment recommended traffic management measures at night along certain routes to mitigate sleep disturbance at these sensitive receptors. Traffic noise management issues are discussed in detail and are addressed in the Visy Noise Management Plan (refer PLANS-VPP-TUM-HSE-004). Management measures are included in Section 6.2, monitoring in 7.1 and reporting in 8.2 of this document.

4.4 Chemical Tanker Deliveries

There are approximately 45,000 tonnes of chemicals delivered to Visy on an annual basis. The Chemical deliveries are mainly in bulk on single or B-double bulk tankers. Minor quantities are transported in packages from 20 litres up to 1,000 litre IBCs on rigid or semi rigid trucks. Some of these chemicals are considered hazardous and classified as Dangerous Goods designated under the Australian Dangerous Goods code. The consignees (chemical supply companies) are responsible for co-ordination of chemical deliveries to site.

The initial assessment of major transport routes for transport of hazardous chemicals was undertaken and documented during stage 1 in the *Transport of Hazardous Materials report* prepared in accordance with *Development Consent Condition no. 13(e)* and with *NSW DUAP "Route Selection" Guideline (1994)*.

An updated assessment incorporating proposed changes to the Hazardous Chemical inventories was undertaken in the *Preliminary Hazard Analysis, October 2006* (PHA 2006) as a requirement of the proposed Visy Expansion and included in *Appendix R of the EA (2007*). This analysis assessed the risk from transportation of hazardous substances along the designated routes in accordance with NSW DoP SEPP 33 guidelines.

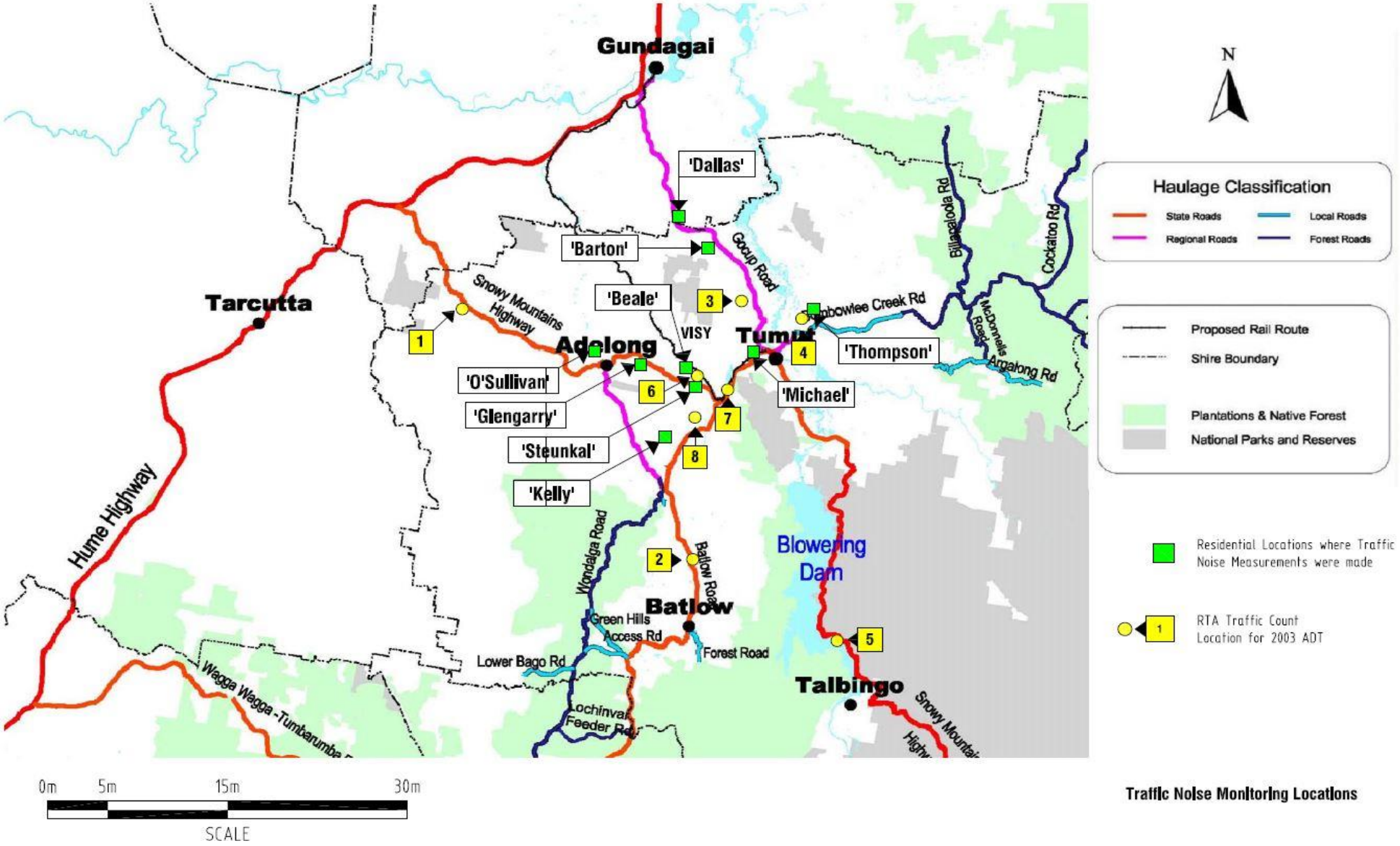

Figure 3.0 Traffic Noise Monitoring Locations

The assessment compared the predicted heavy vehicle movements transporting hazardous substances to the transportation screening thresholds set in Table 2.0 of these guidelines. The results shown in Table 9 of the PHA (2006) indicate the transport screening thresholds were exceeded for five hazardous chemicals (i.e. sulphuric acid, sodium hydroxide, potassium hydroxide, sodium hydrosulphite and turpentine). The Visy development is therefore classified as *potentially hazardous* with respect to transportation and a route evaluation study was undertaken.

A route evaluation study was undertaken against the criteria for transporting potentially *hazardous* materials on the main transportation routes along Gocup road via Gundagai and Snowy Mountains Highway via Adelong. The route assessment was undertaken in accordance with these guidelines against mandatory and subjective considerations.

The Hume Highway is the major transport corridor from Sydney to Melbourne and is not subject to regulations restricting the transport of dangerous goods. The route via either the Snowy Mountains Highway or Gocup Road via Tumut from Gundagai is suitable to be used by vehicles to transport dangerous goods to the mill site. The route does not pass through sensitive residential or commercial receivers as it follows only major arterial roads (as defined by the Roads and Traffic Authority) and it is unlikely to present any additional hazards to land uses as identified in Appendix D of the Route Selection Guidelines, DUAP, 1995. The study concluded that as the designated routes are on major arterial roads they do not pass any sensitive residential or commercial receivers as it follows only major arterial roads (as defined by the Roads and Traffic Authority) and that no additional hazards are posed to land uses along these routes.

4.5 Litter and Dust Emissions

Litter from heavy vehicles during the transporting of materials to site can result in visual and/or environmental impacts. Litter can be caused by traffic accidents, unsecured loads or debris that has been left on a truck after unloading.

Waste trucks transporting boiler ash, slaker grits and dregs or lime mud to local landfills if uncovered have the potential to cause dust/litter during transfer to landfill.

Log trucks transporting logs from forest areas can also result in litter in the form of forest debris, rocks etc. The debris which is initially caught up between the logs is shaken free due to vibration during transit from forest to the mill site.

Environmental fines can be imposed for littering.

4.6 Other Issues

During the Environmental Impact Study (1998), concerns were raised by local residents of excessive dust generation from Visy traffic travelling along the unsealed section of Gadara Road from the Snowy Mountains Highway to access the Visy site. As a result traffic restrictions have been imposed on vehicles travelling to Visy along Gadara road, with no Visy related vehicles to use this road.

The Traffic Impact assessment in Appendix Q of the EA assessed the impacts on public transport, the footpath network and site car parking. The assessment concluded that the traffic impacts will be negligible and the expected car park demand can be adequately catered for within the site's existing infrastructure.

Overflow car-parking typically occurs during maintenance shut-down periods. Temporary car-parking provisions are made to accommodate the increase in vehicles during these periods.

5.0 Criteria and Guidelines

5.1 Development and Project Approval Conditions

The following specific requirements from the Development Approval (1998) and Project Consent Approval (2007) apply to Traffic Management.

Table 7.0 Development Consent Conditions (1998)

No.	Condition of Consent
46	Upon completion of the intersection and access road as required in Conditions 44 and 45, all vehicular access to the site including all trucks and visitor and employee vehicles, shall be via the new intersection and access road unless in the event of an emergency.
47	The Applicant shall ensure that there will be no night time (10pm to 7am) semi-trailer or B-Double truck movements to and from the plant via the Snowy Mountains Highway through Adelong, except where, on the advice of the Director-General in consultation with the Council, such a restriction poses unacceptable impacts on alternative routes.
48	The Applicant shall ensure that there will be no semi-trailer or B-Double truck movements to and from the plant via MR 280 north of Adelong (except for the disposal of waste at Adelong Landfill) unless the road is upgraded and given B-Double status.
50	Prior to the commencement of operations, the Applicant shall prepare a Traffic Management Plan in consultation with the Council, RTA, and the EPA and to the satisfaction of the Director-General. The Plan which shall be incorporated into the Operational EMP required by Condition 11 of this consent shall include but not be limited to: a) records of all vehicles heavy vehicles (3 tonne tare or greater) entering and leaving the site including details of times and access routes used, Photo1; b) measures to reduce sleep disturbance impacts in built up areas including reduced speed limits, prohibition on the use of exhaust brakes, and the provision of air bag suspension to heavy vehicles; c) measures to reduce other impacts in built up areas including restricting heavy vehicle movements to main roads through townships, limiting parking within townships, and the cleaning of trucks; and d) measures to ensure that the provisions of the Traffic Management Plan and Conditions 46-49 are implemented, i.e. education of drivers and any contractual agreements with operators of heavy vehicles which regularly service the site.
No.	Condition of Consent (cont.)

51	The applicant shall participate in the formulation of local roads maintenance requirements to ensure that funding identified for local road infrastructure associated with the operation of the mill is directed to those roads considered by council, in consultation with the Director General, likely to be significantly and directly affected by the operation of the mill.
52	The Applicant shall participate as required by the Director-General in any relevant committee/s established to investigate transport infrastructure initiatives in the region.

Table 8.0 Project Approval Conditions (2007)

No.	Condition of Consent
5.4.d)	An updated Traffic Management Plan to detail measures to mitigate and manage traffic impacts during the operation of the existing plant and project. The Plan shall meet the requirements of the RTA and Council and not necessarily be limited to: i. a driver education program to ensure that noisy heavy vehicle practises are not unnecessarily used near sensitive receivers and that route curfews are respected; ii. best noise practise in the selection and maintenance of heavy vehicle fleets; iii. movement scheduling where practicable to reduce impacts during sensitive time periods; iv. specific measures for ensuring that all heavy vehicle operators associated with the existing plant and project implement the Traffic Management Plan, including the use of penalties for breaches of the Plan; v. specific measures for minimising noise impacts at identified sensitive areas, including a program for the implementation of all feasible and reasonable mitigation measures at the Steunkal and Beale residences; vi. a system for identifying and ensuring conformance with the Plan, including conformance monitoring, procedures for implementing and monitoring corrective and preventative action, and penalties for breaches of the Plan; and vii. a continual improvement process for assessing Plan effectiveness and implementing improvements to the Plan.

5.2 Traffic Noise

The criterion for traffic noise adopted in the EA 2007 is based on the *NSW DEC Guideline: Environmental Criteria for Road and Traffic Noise.*

Table 9.0 Traffic Noise Criteria

	Day (7:00am – 10:00pm) $L_{Aeq(15\ hour)}$	Night (10:00pm – 7:00am) $L_{Aeq(9\ hour)}$
Limit	60 dB(A)	55dB(A)

Where existing noise levels are within 2dB(A) of above criteria, a 2dB(A) allowance may be applied for additional traffic. Where existing measured noise is already at the above levels and a further increase is predicted, than feasible and reasonable mitigation measures are needed.

Background measurements of existing noise levels are predicted noise levels at residential locations on various major resources and product flow routes have been provided in the *Noise Management Plan PLANS-VPP-TUM-HSE-004*

Figure 4.0 Visy Tumut Weighbridge at the entrance to site

All trucks over 3 tonne are weighed as they come onto and leave site, weigh cells are situated either side of the weighbridge office for incoming and outgoing trucks.

6.0 Management Safeguards and Controls

6.1 Visy Management of Road Safety Impacts

6.1.1 Transporting of Paper Products

Approximately one million tonnes of paper products are transported to and from the mill each year. The paper products are in the form of paper reels or square bales. The paper reels which are the finished product, are transported from the Visy site in either curtain sided semi-trailers and B-Doubles or loaded directly into 12 metre shipping containers for export. The reels come in diameters of up to 1.5 metres, up to 3.3 metres in length and weigh up to 3.6 tonnes. They are loaded onto trucks in an upright position with the shorter reels (<1.5 metres) typically double stacked. Visy Logistics commenced the operation of A-Double trucks in 2021. These trucks are used for both curtain sided trailers and 2x 12 metre shipping containers for export.

The number of reels on a truck will vary from 6 to 16 for semi-trailer and 10 to 24 for B-double. The number of reels that can be loaded in a shipping container is from 6 to 16. The maximum payload of a fully loaded truck will be 25 tonnes for a semi-trailer, including containerised loads, and 36 tonnes for a B-Double.

Figure 5.0 Semi trailer being loaded with Paper Reels from the Reel Store

The scheduling of transport loads takes into account payload restrictions for each transport mode. All paper reels are weighed as they come off the end of the paper machine. The weights are recorded on the electronic *Millwide* system and printed on the product label attached to each paper reel. Prior to leaving site, the gross weight of each vehicle is checked and recorded on the outward bound weighbridge. Any vehicle found to be overweight is to be directed back to the Reel store for re-loading. Any discrepancies between calculated payloads off Millwide and the weighbridge will instigate further investigation into accuracy of the weighing systems.

Recycled paper which is used as feedstock in the paper manufacturing process is delivered to site in square bales on either curtain sided semi-trailers or B-doubles. The bales are typically stacked three high to a maximum height of 3 metres. Up to 36 bales can be loaded onto a semi-trailer and 54 bales onto a B-Double. Each bale can weigh from 500 to 750 kg and the average pay-load of a semi-trailer is 22 tonnes and B-double 32 tonnes. All transport loads onto site are weighed across the incoming weighbridge. All details are recorded on the electronic Weighbridge Manager system. All loads carrying paper bales must be properly loaded and restrained from movement. Any vehicle found to have improperly secured load or exceed relevant load limitations is reported back to Visy Logistics.

The transporting of paper products is managed through Visy Logistics who are Visy's National Logistics provider. Visy Logistics utilise their own fleet of heavy vehicles and supplement transport requirements with other carriers through sub-contractor arrangements. Visy Logistics have undergone a program of obtaining Confessional Mass Management Accreditation under the National Heavy Vehicle Accreditation Scheme (NHVAS).

All of Visy Logistic heavy vehicles are equipped with a Global Positioning System (GPS). The system allows vehicles to be tracked in real time monitoring speed, position and breaking patterns. The system is also used to set restrictions on route (i.e. night-time curfews, load restrictions, B-double). As information is saved to a central database, it is used by management for auditing and reporting purposes. All Visy Logistic heavy vehicle operators undergo education and training prior to operating vehicles. Each operator is required to maintain their log-books to record hours of driving and rest breaks. These logbooks are routine checked and information logged and verified against the GPS tracking system.

The loads are placed on trucks to evenly distribute the load and to minimise movement during transport. All drivers are responsible for ensuring all loads are properly and adequately restrained prior to leaving site.

All sub-contract heavy vehicle operators are required to submit a Duty of care plan which documents how they will manage driver fatigue, hours of driving, enforcement of rest breaks, driver training and maintenance of all licence requirements.

Control measures for heavy vehicle impacts are described in Appendix A and B of this document.

6.1.2 Transport of Fibre Resource Products

Over 2 million tonnes of fibre resource products will be transported to site on an annual basis. These products are supplied in the form of pulp logs, sawmill residues and bark. The transport logistics are managed by resource contractors. All resources contractors are required to be accredited under the Road and Maritime Services (RMS) Mass Management scheme. Initially a haulage company must gain accreditation and then ongoing certification by demonstrating and supplying supporting documentation in relation to truck weights both loaded and unloaded, driver training, and maintenance of log books. This is a system that requires ongoing self-management and quarterly self - reporting and following initial accreditation, external auditing by certified auditors every two to three years with reports submitted to the RMS.

In addition every logging area controlled by either Visy or Forests NSW requires the development and implementation of a Haulage Site safety plan with an assessment of the risks associated with logging in the

dedicated forest area as well as the route from the forest area loading point to the mill. All drivers must sign off on this plan prior to submission to either the company or to Forests NSW.

All deliveries are weighed on the inward bound weighbridge. Any trucks found to be over-loaded or poorly restrained are refused access to the unloading area and reported to transporting contractor.

Control measures for heavy vehicle impacts are described in Appendix A and B of this document.

6.2 Environmental Impacts

6.2.1 Traffic Noise Impacts

The traffic noise impact assessment found that the traffic noise impacts from existing traffic volumes already exceeds the NSW EPA criteria and that the increase in noise due to additional traffic volumes is less than 2 dB. The assessment concluded that the noise resulting from the mill expansion will not be extensive or excessive and by adopting some practical noise management measures at night would benefit in limiting the level of traffic noise generated during night time.

The noise management control measures that will be adopted to minimise sleep disturbance are summarised below:

- Driver education program to include that noisy heavy vehicles practices are not necessarily used near sensitive receivers;
- Route curfews are respected;
- Best noise practice in the selection and maintenance of heavy vehicle fleets;
- Movement scheduling where practicable to reduce impacts during sensitive time periods; and
- Specific measures at identified sensitive receptors.

These measures have been included in Appendix B and will be implemented through a communication and awareness program with all transport operators and as part of the traffic noise monitoring program.

6.2.2 Other Environmental Impacts

Heavy vehicles transporting waste paper or fibre resource products are to be swept clean of dirt and debris after unloading. Cleaning is to be undertaken in designated areas in the wood-yard and waste paper area. All contractors are responsible for ensuring all debris is removed prior to leaving site.

Waste trucks transporting boiler ash, slaker grits and dregs or lime mud to local landfills must be properly covered prior to being allowed off site. The weighbridge operator is to visually check loads to ensure they are properly covered.

Heavy vehicle operators transporting pulp logs are required to inspect their load to remove all material that could have the potential to fall off during transport, prior to leaving forestry areas. The Visy Fibre Resources manager undertakes random inspections of forest operation activities. Log trucks are also inspected for compliance to the relevant load restraint guidelines by Visy Fibre Resource managers and wood-yard operators. Any non-conformance is reported to the relevant resource supply company e.g. Forest NSW, Wilmot Forests. A formal procedure exists in the wood-yard for handling any non-conforming trucks/loads

identified by wood-yard operators or weighbridge operators. This information is entered onto the site electronic Incident reporting system as detailed in Section 8.1.1.

All vehicles are to be properly covered prior to leaving. Any unsecured or improperly covered load is to be reported to the Fibre Resources/Logistics Manager.

All accidents along the major routes are to be reported to Visy Logistics or the Fibre Resources Manager as soon as practicable. Any incident that results in a spill or major litter must be reported to the Visy HSE Manager.

6.3 Chemical Tanker Deliveries

The transport of non-hazardous and hazardous goods *(Dangerous Goods)* is the responsibility of the consignees (chemical supply company). The transport and unloading of each consignment is co-ordinated through the Visy Laboratory personnel. The chemical supply companies are notified by Visy of the designated routes.

Drivers and vehicles transporting hazardous chemicals in bulk are required to have a current New South Wales EPA Licence under the *Road and Rail Transport (Dangerous Goods) Act* 1997. A public register of driver and vehicle licences can be accessed via the following website link http://www.licence.nsw.gov.au/gls/. Licences are not required for the transport of minor packaged dangerous goods which include drums, pails, cylinders, bags or boxes less than 450 litre or 400 kg or non-hazardous chemicals. All chemical transport loads carrying placard quantities of dangerous goods are to have appropriate warning signs. The consignor is to ensure that each vehicle transporting dangerous goods should carry the appropriate shipping documents that must include Safety Data Sheets (SDS), acceptable emergency information and advisory telephone contact numbers.

All incidents and accidents involving transport of chemicals regardless if there was a spill or not, must be reported by the consignor to Visy Technical Manager or HSE Manager as soon as practicable. The consignor has responsibility to notify relevant emergency services and regulatory authorities. Visy has specific requirements to notify the NSW Environment Protection Authority of all incidents that have actual or potential to cause significant off-site impacts to people or the biophysical environment.

Dangerous goods vehicles delivering bulk dangerous goods to the site are to include brake interlocks or an alternative safety procedure to the satisfaction of the Director-General, as per *Development Consent Condition 19.*

Visy have developed emergency response procedures and role cards to instruct Visy personnel in responding to a chemical spill that occurs either on site. Emergency services shall be contacted (by dialling 000), immediately to co-ordinate response to spills off-site.

Control measures for heavy vehicle impacts are described in Appendix A of this document.

6.4 Road Restrictions

6.4.1 Visy Access Road Restriction

All vehicular access to the site, including all Contractors and other heavy vehicles, visitor and employee vehicles, is via the site access road, Bachelor Valley Way from the Snowy Mountains Highway unless in the event of an emergency, as per *Development Consent Condition 46*. This is included in the site induction package. Signage is posted at either end of Gadara Road informing drivers of the restricted access to Visy. Any persons not abiding by this condition are placed on notice. Any repeat offence will result in disciplinary action.

6.4.2 Adelong Access Restrictions

No night time (10pm to 7am) semi-trailer or B-Double truck movements are to occur for Visy related traffic, to and from the plant via the Snowy Mountains Highway through Adelong, except where, on the advice of the Director General in consultation with the Council, such a restriction poses unacceptable impacts on alternative routes as per DCC 47 and PCA 5.4 d) v).

Alternative routes for south bound traffic have been identified using Wondalga Forest Road through Rosewood for resources related trucks or via Gundagai and onto the Hume Highway for dispatch trucks.

All heavy vehicles (over 3 tonne) are logged into the electronic Weighbridge Manager database on entry and exit to site in accordance with *Development Consent Condition 50(a)*. Information entered into the system includes:

- Heavy vehicle mass;
- Transporting company;
- Product being transported;
- Name of operator;
- Date and time of entry/exit from site; and
- Access routes.

Reports are routinely generated on the system to identify where breaches of the Adelong Curfew may have occurred. Where breaches have occurred, transport companies are notified. Exceptions are made for some drivers who are residents of Adelong or for heavy vehicles returning to their depot in Adelong. Continual breaches of Adelong Curfew by transport operators will result in revoking their access to site.

All Visy logistics vehicles are fitted with Global Positioning System (GPS) tracking system. The system has been programmed to advise heavy vehicle operators of the restriction on the approaches to Adelong. Reports can be generated that identify any Visy Logistics heavy vehicles that have breached the curfew. Any breaches will result in disciplinary action.

6.4.3 Restriction on use of MR280 North of Adelong

Transport of waste to the below landfills shall be restricted to the following roads as per *Development Consent Condition 48.*

All Contractors and other heavy vehicle drivers that service the Visy site must comply with the above requirement.

These landfills are no longer open. All waste is currently sent to various landfills and reuse sites via the Snowy Mountains Highway and/or Gocup Road.

6.4.4 Landfill Access Route Restrictions

Development Consent Condition 49 restricted the transport of waste to the below landfills on the following roads, however it should be noted that both these landfills are now closed;

1. The Tumut landfill is restricted to the Snowy Mountains Highway (SH4) and Boonderoo Rd; and
2. The Adelong landfill is restricted to the Snowy Mountains Highway (SH4) and MR280.

All contractors and other heavy vehicle drivers that service the Visy site for waste transport to the Adelong and Tumut Landfills must comply with the above requirement.

6.5 Regional Road Planning Objectives

In accordance with *Development Consent Condition 52*, Visy are required to participate in any committees to investigate transport infrastructure initiatives in the region. Visy are represented on the following two committees:

- South West Slopes Softwoods Working Group (SWSSWG),
- Forest Industry Council (FIC)

The FIC's objectives focus on promoting the continued development of the Forestry Industry within the region. As a component of this the FIC works closely with councils, state government and the RTA to improve maintenance, standards and safety along the main haulage roads.

The SWSSWG is a subcommittee of the Regional Development Australia (Murray) Board. The committee is made up of relevant Shire Councils, Forests NSW and NSW RMS and regional timber industry representatives. Meetings are held every three months and include discussions and setting of priorities for local and regional road upgrade works to enable the safe supply of raw timber product to the various processing mills.

Activities that the SWSSWG are involved in to address the above issues include:

- Maintain briefing to the relevant Federal Members of Parliament as well as local State Government members, and obtain their support for funding submissions. All local and regional electoral members have been invited to tour the mill and forest operations; and
- Using the SWSSWG group as a forum for setting priorities the local Shire Councils (Gundagai-Cootamundra, Snowy Valleys, Greater Hume and Wagga Wagga) have made various applications for funding. This has included in 2009 ongoing projects as detailed below;

    - Main road 278, Wee Jasper Road to Bombowlee Creek Road (Tumut) – project completed;
    - Green Hills access road (Tumut) project complete;

- Forest Road, Batlow (Tumut) – Roads to recovery program – complete;
- Coppabella Road, (Greater Hume) – applications approved; and
- Downfall Road, (Tumbarumba) – applications approved.

- The SWSSWG has continued to make representation to both Federal and State politicians in regard to the:

  - Gocup Road upgrade for incoming raw materials and distribution of finished products trucks. The project was designed to increase the number of overtaking lanes, improve alignment and pavement capacity, and meet RMS safety standards.
  - Snowy Valleys Council (formally Tumut Shire Council) has also strongly lobbied both Federal and State members in relation to the state of Gocup Road not meeting current standards and that safety is a concern to all uses (road upgrade project completed in 2019); and
  - Targeting the so called regional back bone route from Shelley in Victoria to Gundagai NSW as a regional transport route for forest related products.

6.6 Truck Scheduling

Visy are required in accordance with *Development Consent Condition* 95 to assess and implement measures to minimise night time truck movements. The assessment of measures is to be included in a Truck Scheduling Report, which is reviewed every two years.

The Truck Scheduling Report included in Appendix C details typical truck movements (for each product type) per hour over the two periods 0700-2200 and 2200-0700 each day.

As Visy Tumut operates continuously, goods can be received and despatched over 24 hours a day, 7 days per week. Scheduling of deliveries is predominantly influenced by factors outside the control of Visy. These factors include:

- Restrictions due to forestry operations for supply of logs (typically restricted to daylight hours);
- Allowance for distance and travel time from forests supplying logs to Visy mill;
- Sawmill operations for supply of sawmill residue and bark;
- Box plant operations for receiving finished paper; and
- Materials recycling facility plant operations for supply of Waste Paper.

The typical distribution of heavy vehicle movements are illustrated in Figures 3-12 and 3-13 in Appendix Q of the Environmental Assessment (2007). For the period from June to December 2005 the main truck movements occur during the week from Monday to Friday and on Saturdays with daily peak typically occurring from 07:00 through to 14:00 each day. The traffic movements on Sundays and during night-time are significantly less.

The predicted increased traffic movements for the Visy Expansion are expected to follow similar trends with the majority of movements occurring during the daytime. This has been factored in to the Truck Scheduling Report in Appendix C. An annual review of the report against the weighbridge records will allow comparisons to be made with current traffic volumes and those predicted in the Traffic Assessment during the Environmental Assessment. The annual review will be included in the Visy annual Environmental

Compliance and Monitoring Report as per the requirements of *Development Consent Condition 95* and *Concept Approval 6.3*.

The schedule is based on current estimates of truck movements which have been updated from the Environmental Assessment 2007. Where curfews apply, traffic movements have taken into account alternate routes.

6.7 Traffic Control on Site

All site traffic enters via either the weighbridge or the dedicated car park through the security boom gate. Entry to either of these points is via an electronic swipe card or specifically by the weighbridge operator. All staff and contractors undergo an online induction prior to being issued with a permanent swipe card, this induction details information for speed limits and dedicated walkways on site. For safety reasons pedestrian traffic on site is limited to specific walkways and roadways are appropriately marked and signposted as per the requirement of *Project Approval Condition* 2.35. There are specific speed limits for all trucks on site to 8km/hour and to other vehicles of 15km/hours.

All cars park in the dedicated car park at the front of the administration building, with only specific trade vehicles associated with maintenance allowed onto the site, and these vehicles are kept to a minimum and must have a flashing light operating at all times while on site and park in specific areas.

Heavy vehicle movements are regulated on site. Log trucks waiting to be unloaded are required to queue on the main road accessing the wood yard area until given the all clear to proceed.

All Paper Transport trucks are directed to the Reel store. Trucks are required to queue in front of main entry to the Reel store until given clearance.

Wastepaper trucks are directed to the Waste paper storage yard. Once unloaded, they continue on to the Reel store for loading with Paper Reels.

6.8 Training and Responsibilities

6.8.1 Training

The following training measures will be undertaken to ensure provisions of the Traffic Management Plan are implemented;

- All Contractors and other heavy vehicle drivers that service the Visy site undergo site induction and awareness training;
- All laboratory and related staff who handle chemicals and dangerous goods undergo a chemical handling training course;
- Weighbridge operators undergo training in regards to their responsibilities; and
- Visy Logistics undertake competency and training of all permanent employees and casual labour.

Visy Logistics have a comprehensive driver education programme in place. All new employees must complete a recruitment and induction process, which ensures that all prospective employees meet the minimum employment criteria against the Visy recruitment and selection process and transport operation safety standards.

The induction process includes online training using the company's Learning Management System (LMS). The program consists of nine components:

- *The Visy Logistics Company Driver Manual* – A manual that needs to be read and acknowledged;
- *Rollover Prevention – Cornering* – A document that needs to be read and acknowledged;
- *Visy Logistics – Alcohol & Other Drugs Policy* – A document that needs to be read and acknowledged;
- *Visy Logistics Drivers Licence Policy* – A document that needs to be read and acknowledged;
- *Loading and Load Restraint Procedure* – A document that needs to be read and acknowledged;
- *Visy Logistics – Coupling and Uncoupling Procedure* – A document that needs to be read and acknowledged;
- *Visy Speed and Speeding Policy* – A document that needs to be read and acknowledged;
- *The Visy Logistics Company Driver Manual & Policies – Assessment*. This assessment must be completed with a score of 100%; and
- *Mass Management Training* – A course and assessment that must be completed with a score of 100%.

The next stage of the induction training process involves a Practical Driving Assessment and Competency Verification. This includes both a written and driving based assessment by a qualified driver assessor. The Recruitment and Induction Procedure is included in Appendix D.

Visy Logistics employees also do refresher training for key areas, usually every 12 months or if an employee has a non-conformance they will undergo refresher training in that particular area. Visy's Intranet has a Road Traffic Safety Management Section which contains related Codes, Forms, Journey Management Plans, Permits, Policies, Procedures, Regulatory Guides, Safe Working Practices, Standards and Toolbox Talks.

6.8.2 Responsibility

Key responsibilities for ensuring the implementation of the Visy Traffic Management Plan are as follows:

Visy Logistics Operations Supervisor/Managers – is responsible for ensuring driver training incorporates the controls outlined in the Traffic Management Plan; for reporting of all incidents that has potential to cause significant off site impacts and tracking driver performance and adherence to route restriction.

Visy Pulp and Paper Despatch Manager – is responsible for ensuring that all drivers are complying with all statutory and Traffic Management Plan requirements; ensuring transport loads leaving site are properly lashed; and ensuring truck loads are within legal limits.

Weighbridge Operator – is responsible for ensuring details of all heavy vehicle movements are recorded over the weighbridge and for ensuring all heavy vehicle operators have undergone the Site's Heavy Vehicle Operators Induction.

Fibre Resources Manager – is responsible for ensuring all contractors involved in the transport of fibre resource product have been advised of the obligations under the Visy Traffic Management Plan; reporting and follow up of any off-site traffic incidents/accidents.

Visy HSE Manager – is responsible for ensuring monitoring and auditing of the Traffic Management Plan is undertaken and reporting of all significant transport incidents to NSW Department of Planning and Environment and that non-conformances are followed up and closed out properly.

Visy Technical/Laboratory Manager – is responsible for ensuring Hazardous Chemical suppliers are advised of the designated routes, transport operators have appropriate licence and placarding and that all significant transport incidents are reported to the Visy HSE Manager.

7.0 Monitoring

7.1 Heavy Vehicle Monitoring

Details of all trucks greater than 3 tonne tare are recorded into the electronic database system on entering and leaving site in accordance with *Development Consent Condition 50(a)*. Information includes details of times and access routes used, truck ID and company name, as well as type and weight of material, and consignees name.

This data is utilised for annual review of traffic volumes, investigation into traffic related incidents and for auditing compliance with *Development Consent Condition 47* relating to the Adelong Curfew.

7.2 Visy Logistics Fleet Management System

Visy Logistics fleet management system incorporates a GPS system that can accurately track each vehicle in its fleet in real time. The system can be used to assess compliance with road laws, set specified road access restrictions and monitor compliance with other regulatory requirements.

7.3 Traffic Noise

Within 12 months of commencement of operation of the first phase of the project (Stage 2 expansion), four quarterly traffic noise monitoring assessments were undertaken at locations identified in Appendix O of the Environmental Assessment as per *Project Approval Condition 3.9,* and provided in Figure 3. Traffic noise monitoring data is to be compared with the predicted traffic noise impacts detailed in the documents listed under *Project Approval Condition* 1.1 and the DECC's Environmental Criteria for Road and Traffic Noise (1999). In the event that the monitoring program indicates that the traffic noise associated with the project will lead to an exceedance of traffic noise criteria and greater noise impacts than that predicted in the documentation listed under *Project Approval Condition* 1.1, then details of mitigation measures to be implemented to reduce traffic noise impacts shall be developed. Details of the mitigation measures and a timetable for implementation shall be submitted to the Director-General for approval within such period as the Director-General may require, and be accompanied by evidence that the DECC is satisfied that the mitigation measures are acceptable.

For all four traffic noise assessments, compliance was achieved at all considered residential locations. Noise levels at location R5 were initially found to be higher than the noise limits even for periods when there were no recorded trucks associated with Visy passing through Wee Jasper Rd. Therefore, the traffic noise contribution from Visy at this receiver was calculated and found to comply with the traffic noise criteria.

7.4 Data Storage and Retrieval

The electronic weighbridge data is stored on a database and is backed up daily onto a server in the server room. Retrieval of data can be either by paper copy or more commonly electronically, and by any of the fields entered on the weighbridge docket. This is verified on a daily to annual basis as part of the various auditing processes that the data is subject to as detailed in Section 9.0.

8.0 Reporting and Review

8.1 Legal Reporting Requirements

8.1.1 Incident and Complaint Reporting

All transport contractors or companies must report all incidents and accidents involving the transporting of materials/goods to Visy Supervisors, Logistics or Technical Manager as soon as possible. All Incidents are ranked from 1 to 5 in accordance with Visy Incident Classification (refer to Table in HOWTO-VPP-TUM-HSE-041 Environmental Incident Reporting HowTo) and reported to relevant personnel and agencies in accordance with Visy Reporting Requirements (refer to HOWTO-VPP-TUM-HSE-041 Environmental Incident Reporting HowTo) and with DCC15, Concept Approval 6.1 and EP licence clause R2.

A free call 24 hour/day hotline (phone number 1800 117 910) is available to the public to notify the site of any incidents, complaints, comments etc, including complaints in regard to traffic or trucks associated with Visy. Any complaints are lodged as per VP9-10-10.4-005 Complaint Response Procedure.

In accordance with the Visy Environmental Incident Reporting and Complaints Response Procedures, all incidents/complaints are reported in Vault, the electronic reporting database system that automatically notifies relevant personnel and senior management and used for incident review and tracking results of investigations and corrective actions.

Any transport incident with an actual or potential off-site impact on people or the environment is to be reported to the Department of Planning and Environment (DPE) within 24 hours as per *Development Consent Condition 15*.

In the event that complaints/concerns regarding driver behaviour are reported to Visy, the relevant transport contracting company or driver if it's an owner driver is to be formally notified by Visy. For serious or repeated cases this may lead to revoking entry to site for the offending driver.

8.1.2 Annual Environment Compliance Report

The Visy HSE Manager is to prepare an Annual Environmental Compliance and Monitoring report in accordance with *Development Consent Condition no 12* and the *Concept Approval Condition 6.3*.

This report is submitted annually to the NSW Department of Planning and Environment by the end of October in each year. Copies are also to be provided to the EPA in accordance with Condition R1.10 of the EPL, Snowy Valleys Council and Visy Community Consultative Committee (VCCC).

8.1.3 Truck Scheduling Report

The Visy HSE Manager is to prepare a Truck Scheduling Report to be submitted to the NSW Department of Planning and Environment, and reviewed every 2 years in accordance with *Development Consent Condition 95*. The Truck Scheduling Report is attached as Appendix C.

8.2 Traffic Noise Monitoring Program Report

A report is to be prepared and submitted to the NSW DECC and DoP Director General providing results of traffic noise assessment as outlined in Section 7.3 and in accordance with *Project Consent Condition 3.9*. The report is to be submitted within 28 days after completion of the noise monitoring program.

Four quarterly traffic noise monitoring assessments were undertaken at locations identified in Appendix O of the Environmental Assessment as per *Project Approval Condition 3.9.* All four reports have been submitted.

8.3 Community Consultation

8.3.1 Visy Community Consultative Committee

The Visy Community Consultative Committee made up of representatives of council and local community members meet with Visy management and environmental personnel on a regular basis to review and monitor Visy compliance with conditions of consent in accordance with *Development Consent Condition 72* and *Concept Approval Condition 4.1*.

A review of all environmental monitoring and investigations into community complaints are presented at each meeting. Committee members are provided opportunity to raise any specific concerns or issues. Meeting minutes are recorded and distributed to all those present and representatives of the EPA and DPE.

8.3.2 Local Community Consultation

Visy Management and Environmental personnel partake in a more informal consultation program with the local community that are most affected by the mill's operations. The consultation program is taken in the form of shutdown notifications, electronic mail, telephone conversations and routine visits to residences. Regular updates on the mill's environmental performance are provided and community members are encouraged to raise issues or concerns.

9.0 Auditing

9.1 Legal Requirements and External Audits

9.1.1 Annual Audit

An Independent Environmental Audit is to be undertaken in accordance with Development Consent Condition 71 and Project Approval Condition 3.16. This audit covers all aspects of monitoring and environmental performance and compliance with all development consent and Environment Protection Licence conditions.

The audit report is to be submitted to the Department of Planning & Environment, Snowy Valleys Council, and Visy Community Consultative Committee. In addition a copy is supplied to the NSW EPA in accordance with *Condition R1.10* of the *EPL No. 10232*.

9.2 Internal Environmental Audits

9.2.1 Internal Environmental Management System and Compliance Audit

An internal EMS and Compliance Audit of the site is undertaken in accordance with Visy Corporate Procedure 1102 – HSE Audit System. The Visy Group Manager Safety and Environment, co-ordinates and implements the audit program which is conducted in accordance with Corporate EMS Audit Protocol.

9.2.2 Complaints Register Audit

A register of all community complaints as required by *Development Consent Condition No. 74* and *Concept Approval Condition 4.3* is maintained electronically in the Visy reporting system. The status of all entries are reviewed by the Visy Environmental Manager and closed out if all actions have been completed. The complaints register and results of the internal Audit Review is included in the quarterly report provided to Visy Community Consultative Committee, DPE, EPA and Snowy Valleys Council in accordance with *Development Consent Condition 76.*

9.2.3 Environmental Management System Audit

Triennial Re-certification and annual Surveillance audits of the Integrated Management System, which incorporates the quality, environment and safety management systems, are undertaken in accordance with requirements of international standards relating to audit practice such as ISO 19011 by a certified Auditing Organisation. The purpose of the audit is to assess the sites compliance to the principles of the Management System Standards (i.e. ISO 14001, ISO 45001, ISO 9001).

9.2.4 Adelong Curfew

An electronic notification system notifies the Logistics supervisor and HSE Manager daily of any breaches of the curfew. These are then checked for any anomalies, e.g. if the truck belongs to a carrier who has a depot in Adelong (e.g. Toll) or if the driver lives in Adelong, or if the truck is parked up on Visy roadway waiting for curfew time to expire before proceeding. Any breach is forwarded through on a daily basis to Visy Logistics and then immediately to the relevant carriers.

9.2.5 Traffic Management Plan Conformance Review

A review of the site's conformance with the Traffic Management Plan is carried out on an annual basis by the Logistics Manager and HSE Manager. This review includes an assessment of any Adelong curfew breaches, status of the driver education programme and identifying any continuous improvement measures which may be implemented.

References

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NSW Department of Environment, 1999. Environmental Criteria for road and traffic noise.

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Visy Pulp and Paper Pty Ltd, 2007. Environmental Assessment for Major Project Tumut Mill Expansion, 2007, Appendix O: Truck Noise Report

Visy Pulp and Paper Pty Ltd – Environmental Assessment for Major Project Tumut Mill Expansion, 2007, Appendix Q: Traffic Assessment

Visy Pulp and Paper Pty Ltd – Environmental Assessment for Major Project Tumut Mill Expansion, 2007, Appendix R: Preliminary Hazard Assessment

Appendix A – Control Measures for Heavy Vehicle Traffic Impacts on Road Safety

Objective	Control Measures	
Heavy Vehicle Operators competency	Appropriate licensing and training of Heavy Vehicle Operators	Check Heavy Vehicle Operator license Heavy vehicle operators to undertake Site induction and training
Heavy Vehicle Operators compliance with all road safety rules and requirements	Awareness and training	Site induction Heavy vehicle operator to have appropriate competency/licence
	Toll free number displayed on Heavy Vehicles to report complaints from general public	Report road safety breaches to transport managers and contractors
	GPS tracking system	Undertake audits/review of GPS tracking system for breaches of road safety rules
Outbound Heavy Vehicles are within the mass load limitations	Schedule transport loads within Confessional Mass Management Limitations	Paper reels weighed and included on product labels Paper reel scales routinely calibrated Transport load checked during loading operations
	Transport loads weighed on outward bound weighbridge scales	Overloaded trucks are returned for re-loading Weighbridge scales are routinely calibrated Weighbridge scales are checked against scheduled transport load data
	Seek and Maintain NHVAS Mass Management accreditation	Apply NHVAS Mass management standards to all fleet and sub-contractor heavy vehicles. Undertake internal and external audit program to assess compliance
Inbound Heavy Vehicles are within mass load limitations	Weigh all inbound heavy vehicles	check mass against applicable Mass load limits (MLL) report any breaches of MLL to Logistics/Transport Company
	Fibre resource sub-contractors accreditation to MASS management standards	Check accreditation Review results of compliance audits Review compliance reports
Outbound Heavy Vehicle loads are properly restrained	All loads to be adequately restrained	Position loads to prevent movement during transport Check restraint system is appropriate and has been properly secured Check restraint system is in suitable condition Regularly check load restraint system during transport

Inbound Heavy Vehicle loads are properly restrained	Check load and restraint configuration of inbound	No unloading of inadequately restrained or unstable loads Reporting of inadequately secured loads or unstable loads to fibre resource, transport managers and operators
Fatigue management	Compliance with fatigue management requirements	Review logbooks to ensure entries are completed and accurate Review GPS tracking system to monitor compliance with fatigue management requirements sub-contractor heavy vehicle operators to provide 'Duty of Care' plan VP heavy vehicle operators to undertake driver induction training

Appendix B – Control Measures for Heavy Vehicle Traffic Impacts on the Environment

Objective	Control Measures	
Heavy Vehicles are appropriately operated and maintained to minimise excessive noise	Maintenance programme for heavy vehicles	Check vehicles are regularly maintained Report any heavy vehicles with excessive noise
	Driver awareness program	Association and participation with relevant industry organisation (ie. Forest Industry Group,) and transport contractors Site induction and training
	Where practicable all Heavy Vehicles to be fitted with air bag suspension	Include in heavy vehicle specification for VL fleet Communicate requirements to all transport contractors
Heavy vehicle operators to comply with route curfews	Awareness and training	Site induction and training
	Undertake audits/reviews of routes during curfew periods	Report breaches to transport managers and contractors site entry restrictions for repeated offences
	GPS tracking system	Undertake audits/review of GPS tracking system for breaches
Restrict the use of compression breaks or excessive speeds in built up areas and sensitive receivers	Awareness and training	Site induction and training Identify sensitive receivers
	Signage	Warning signs located on approaches to built up areas
	Toll free phone number to be displayed on Heavy Vehicles	Investigation of noise complaints from general public
	Routine Noise monitoring along main transport routes	Assessment of noise levels to relevant traffic noise criteria
Scheduling of loads to reduce Transporting during 'night-time'	Where practicable loads to be scheduled to minimise impacts on sleep disturbance	Select alternate routes during night time to avoid sensitive receivers or route curfews
Prevent litter or debris from trucks causing pollution	Heavy vehicles are to be swept clean in designated areas	Site induction and training
	Open top trucks to have loads covered appropriately.	Site induction and training Check trucks are appropriately covered prior to leaving site

		report incidents of inadequately covered loads to relevant transport manager and contractors
Minimise incidents or accidents from transporting of chemicals	Dangerous goods to be transported by licensed operators in licensed heavy vehicles	check licensing information of transport vehicles and operators Ensure emergency contact information and Safety Data Sheets are on chemicals are available ensure heavy vehicles transporting dangerous goods have appropriate signage
	Emergency response procedures for accidents/incidents involving transporting for chemical	Training in emergency response procedures
	All hose connections and hatches are properly closed and secured prior to transport	Loading and transport of chemicals in accordance with procedure Report any chemical spills to relevant chemical or transport manager or Chemical supply company.
	All gas cylinders are appropriately transported	check gas cylinders are properly secured check vehicle transporting gas cylinders has appropriate licence check dangerous goods signage on transport vehicle

Appendix C – Truck Scheduling Report FY22

Product	Into/Out of Site	Total Volume(t)	Total Trucks	Total Movements	Peak Day Time Movements	Peak Night Time Movements
Boiler Fuel	IN	29,835	1,784	3,568	36	10
Chemical Sales	OUT	400	20	40	2	0
Chemicals	IN	40,751	1,424	2,843	20	6
Finished Paper	OUT	686,472	16,666	26,321	119	50
Other	OUT	13,629	2,552	5,074	53	8
Pulp Log	IN	1,387,286	35,160	70,320	258	134
Purchased Pulp	IN	31,706	983	1,093	21	11
Sawmill Chip	IN	487,241	15,592	31,183	120	44
Waste Paper	IN	241,417	9,051	11,240	54	15
Waste Removal	OUT	102,107	3,965	7,930	94	22
Total		3,020,844	87,197	159,612	258	134

			Total Tonnes Per Annum	Number Of Trucks In Period	Average Trucks In Period	Total Movements Per Annum	Average Movements In Period	Peak Movements In Period	Average Movements Per Hour
Boiler Fuel	MON - FRI	07:00 - 22:00	25,630	1,545	5.94	3,090	11.88	36	0.79
	MON - FRI	22:00 - 07:00	3,498	209	0.80	418	1.61	10	0.18
	SAT	07:00 - 22:00	447	19	0.37	38	0.73	6	0.05
	SAT	22:00 - 07:00	112	4	0.08	8	0.15	2	0.02
	SUN	07:00 - 22:00	148	7	0.13	14	0.27	4	0.02

Chemical Sales	MON - FRI	07:00 - 22:00	400	20	0.08	40	0.15	2	0.01
Chemicals	MON - FRI	07:00 - 22:00	36,204	1,261	4.85	2,517	9.68	20	0.65
	MON - FRI	22:00 - 07:00	2,552	100	0.38	200	0.77	6	0.09
	SAT	07:00 - 22:00	1,067	34	0.65	68	1.31	6	0.09
	SAT	22:00 - 07:00	21	1	0.02	2	0.04	2	0.00
	SUN	07:00 - 22:00	907	28	0.54	56	1.08	4	0.07
Finished Paper	MON - FRI	07:00 - 22:00	415,109	10,153	39.05	15,483	59.55	119	3.97
	MON - FRI	22:00 - 07:00	158,082	3,816	14.68	6,130	23.58	50	2.62
	SAT	07:00 - 22:00	52,915	1,265	24.33	2,264	43.54	103	2.90
	SAT	22:00 - 07:00	22,168	507	9.75	949	18.25	39	2.03
	SUN	07:00 - 22:00	25,651	631	12.13	978	18.81	69	1.25
	SUN	22:00 - 07:00	12,547	294	5.65	517	9.94	30	1.10
Other	MON - FRI	07:00 - 22:00	11,498	2,260	8.69	4,503	17.32	53	1.15
	MON - FRI	22:00 - 07:00	1,224	186	0.72	363	1.40	8	0.16
	SAT	07:00 - 22:00	459	66	1.27	131	2.52	14	0.17
	SAT	22:00 - 07:00	264	22	0.42	42	0.81	6	0.09
	SUN	07:00 - 22:00	136	14	0.27	27	0.52	4	0.03

	SUN	22:00 - 07:00	48	4	0.08	8	0.15	2	0.02
Pulp Log	MON - FRI	07:00 - 22:00	921,930	23,655	90.98	47,310	181.96	258	12.13
	MON - FRI	22:00 - 07:00	397,212	9,845	37.87	19,690	75.73	134	8.41
	SAT	07:00 - 22:00	24,832	613	11.79	1,226	23.58	74	1.57
	SAT	22:00 - 07:00	14,373	353	6.79	706	13.58	46	1.51
	SUN	07:00 - 22:00	20,075	483	9.29	966	18.58	34	1.24
	SUN	22:00 - 07:00	8,864	211	4.06	422	8.12	22	0.90
Purchased Pulp	MON - FRI	07:00 - 22:00	21,101	654	2.52	739	2.84	21	0.19
	MON - FRI	22:00 - 07:00	8,517	268	1.03	287	1.10	11	0.12
	SAT	07:00 - 22:00	638	18	0.35	19	0.37	4	0.02
	SAT	22:00 - 07:00	1,047	31	0.60	35	0.67	3	0.07
	SUN	07:00 - 22:00	317	9	0.17	10	0.19	3	0.01
	SUN	22:00 - 07:00	86	3	0.06	3	0.06	2	0.01
Sawmill Chip	MON - FRI	07:00 - 22:00	351,576	11,549	44.42	23,097	88.83	120	5.92
	MON - FRI	22:00 - 07:00	113,666	3,317	12.76	6,634	25.52	44	2.84
	SAT	07:00 - 22:00	11,584	388	7.46	776	14.92	38	0.99
	SAT	22:00 - 07:00	4,750	137	2.63	274	5.27	16	0.59

	SUN	07:00 - 22:00	4,851	175	3.37	350	6.73	14	0.45
	SUN	22:00 - 07:00	814	26	0.50	52	1.00	6	0.11
Waste Paper	MON - FRI	07:00 - 22:00	170,520	6,625	25.48	8,532	32.82	54	2.19
	MON - FRI	22:00 - 07:00	43,143	1,512	5.82	1,652	6.35	15	0.71
	SAT	07:00 - 22:00	11,649	383	7.37	459	8.83	34	0.59
	SAT	22:00 - 07:00	2,790	91	1.75	105	2.02	8	0.22
	SUN	07:00 - 22:00	10,714	353	6.79	396	7.62	21	0.51
	SUN	22:00 - 07:00	2,601	87	1.67	96	1.85	5	0.21
Waste Removal	MON - FRI	07:00 - 22:00	68,210	2,845	10.94	5,690	21.88	94	1.46
	MON - FRI	22:00 - 07:00	33,897	1,120	4.31	2,240	8.62	22	0.96

Appendix D – Visy Logistics Recruitment and Induction Procedure