Operational Environmental Management Plan

(To be used in conjunction with the Visy Management System)

AxTRF

Alexandria Dry Recyclables Transfer Facility

85 Burrows Road, Alexandria NSW

[aka. 112-120 Euston Road – no site access from Euston Road]

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Attachments

A – Visy Environmental Policy

B – Register of Statutory Operational Control Measures and Implementation

C – Visy Alexandria TRF site layout

D – Green Workplace Travel Plan

E - Visy Recycling 10 Lifesaving Rules

F - Visy Recycling Safe Behaviour and Compliance Audit

G - AxTRF Environmental Audit

AxTRF Operational Management Plans

Operational Environmental Management Plan (OEMP)

Waste Management Plan (WMP)

Traffic Management Plan (TMP)

Air Quality Management Plan (AQMP)

Noise Management Plan (NMP)

Flood Risk Management and Emergency Response Plan, including Flood Evacuation and Emergency Response Plan (FEERP)

Document control

Version	Revisions	Date of issue	Prepared By	Approved By
V1	Draft for DPIE	31 August 2020	Jake Luschwitz Anne Trevena	
V1	Address DPIE comments	1 October 2020	Anne Trevena	Luke Krstanovski

Glossary/Abbreviations

AAA	Authorised access area
1% AEP	Annual exceedance probability – a 1% AEP flood is a flood with 1% chance of occurring (or being exceeded) in any year
A&I Register	Site environmental aspects and impacts register used by Visy as primary environmental risk management document
AQMP	Air Quality Management Plan (Attachment E)
AxTRF/Facility/Site	The dry recyclables facility approved as SSD-10364 on 22 April 2020
AxTRF management plans	This OEMP and its supporting management plans
BoM	Bureau of Meteorology
Conditions	The conditions of consent for the approval of SSD-10364 dated 22 April 2020
COR	Chain of Responsibility
DPIE	Department of Planning, Industry and Environment
Development approval	SSD-10364 for Visy DRF/AxTRF
DRF	Dry recyclables facility
EIS	Environmental Impact Statement for Visy Dry Recyclables Facility dated November 2019
EPA	Environment Protection Authority
EP&A Act	Environmental Planning & Assessment Act 1979
EPL	Environmental Protection Licence
ERP	Emergency Response Plan
FCM	Fully commingled recyclable material
FEB	Fire Engineering Brief
FEERP	Flood Evacuation and Emergency Response Plan (Attachment G)
FEL	Front End Loader
FRNSW	Fire and Rescue NSW
HSE system	Visy's Health, Safety and Environment System within VMS
IBC	Intermediate bulk container
ISO	International Organization for Standardization
MRF	Materials recovery facility
NMP	Noise Management Plan (NMP)
OEH	Office of Environment and Heritage

OEMP	Operational Environmental Management Plan (this plan)
P&C	Source-separated paper and cardboard
PIRMP	Pollution Incident Response Management Plan
Planning Secretary	The Secretary of the Department of Planning, Industry and Environment
PME	Powered Mobile Equipment, including forklift and FEL
POEO Act	Protection of the Environment Operations Act 1997
RTS	Response to Submissions for Visy Dry Recyclables Facility dated February 2020
SAP	Systems Application and Products data system
SEARs	Secretary's Environmental Assessment Requirements dated 6 September 2019
SSD	State Significant Development
Stage 1	Operation as a recyclable material transfer facility for up to 110,000 tpa FCM and 45,000 tpa P&C
SWP	Standard Work Practice
tpa	Tonnes per annum
TMP	Traffic Management Plan (Attachment D)
TRF	Recyclable material transfer facility
Visy	Visy Industries Australia Pty Ltd ABN 74 004 337 615
VMS	Visy Management System incorporating HSE System
Waste Regs	Protection of the Environment Operations (Waste) Regulation 2014
WMP	Waste Management Plan (Attachment C)

1 INTRODUCTION

1.1 Overview

Visy is an integrated packaging, paper and resource recovery company operating in Australia for over 70 years and with over 120 sites throughout Australasia. Across Australia, Visy processes recyclables from more than 3 million households and workplaces in any year and in FY2017-18 Visy's recycled paper machines produced over 809,000 tonnes of 100% recycled paper.

Visy has provided recycling services to eastern Sydney and beyond since the late 1990s and in 2020 received approval to develop a modern dry recyclables facility at Alexandria to replace their St Peters facility. The Visy Alexandria Dry Recyclables Transfer Facility (AxTRF; the facility/site) will be developed in two stages:

- Stage 1 - recyclable material transfer facility which receives:
    - Up to 110,000 tonnes per annum (tpa) of fully commingled recyclable

material (FCM) from kerbside collections for consolidation and transfer to Visy's network of material recovery facilities (MRFs); and

    - Up to 45,000 tpa of source-separated paper and cardboard (P&C) from commercial businesses and compacts the loose material into bales (baling operation) for transfer to Visy's network of recycled paper machines; and
- Stage 2 - addition of a MRF to separate FCM into various recyclable material streams such as paper/cardboard, plastics, glass, steel and aluminium.

The facility was granted development approval SSD-10364 on 22 April 2020.

The facility operates under Environmental Protection Licence (EPL) 21359 issued on 20 October 2020.

This Operational Environmental Management Plan (OEMP) is for stage 1 operation and is prepared in requirement of condition C5 of SSD-10364. Under condition C7, operation must not commence until this OEMP and its attached management plans are approved by the Planning Secretary and the operation must be in accordance with this OEMP.

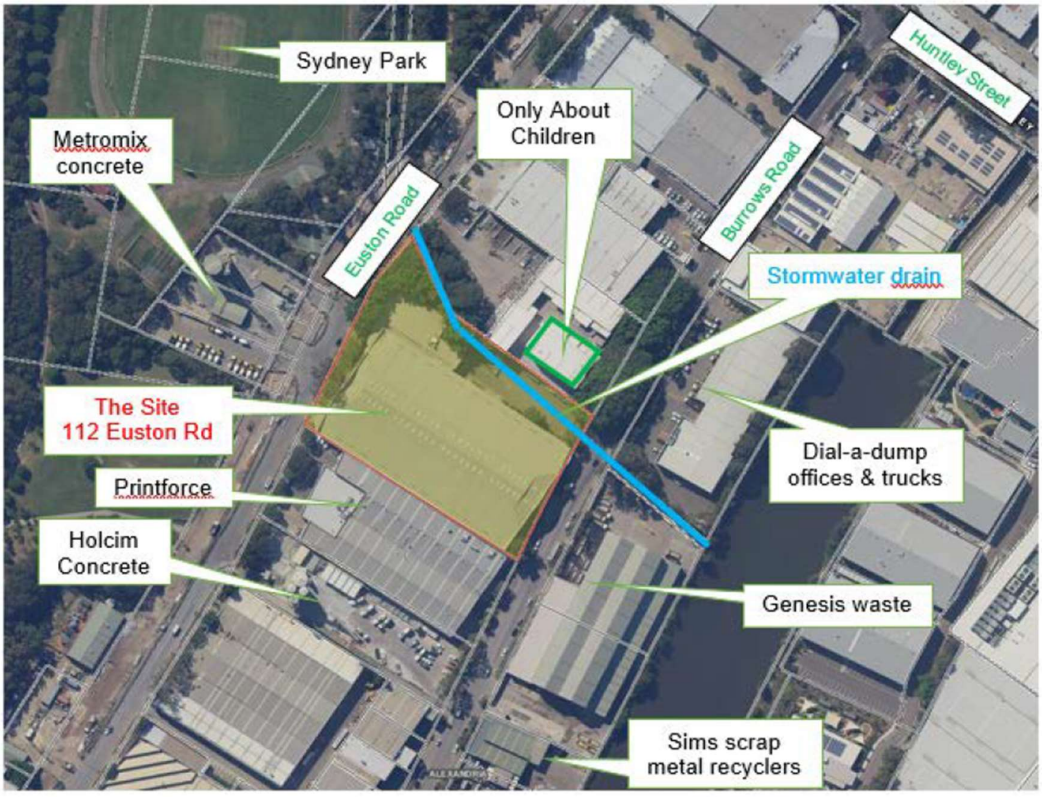
1.2 Site Overview

The site street address is 85 Burrows Road, Alexandria NSW Australia 2015. The legal site address is 112-120 Euston Road, however there is no access from Euston Road, so the site is known as 'Visy TRF Burrows Road'.

Stage 1 of the Visy Recycling AxTRF is a recyclable material transfer facility receiving up to 155,000 tpa of recyclable materials from across Eastern Sydney and beyond.

The location of the site, neighbouring premises and key features are shown in Figure 1. The site is located in an IN1 General Industrial zone within the City of Sydney. It covers approximately 12,600m^2 of land and has two buildings, being a large operations building of approximately 7,700m^2 with dual road frontage to Euston Road and Burrows Road, and a two-storey office building with a 28 space car park. The site is accessed from Burrows Road only. An open stormwater drain runs partially through the site and under the car park and then under Burrows Road to drain into the Alexandra canal.

AxTRF is surrounded by industrial and commercial neighbours, including a neighbouring multi-tenanted development to the north at 95 Burrows Road that includes a child care centre (Only About Children). The nearest residences are approximately 285 metres to the north across Sydney Park.



Source: Six Maps

Figure 1. The site location, neighbouring premises and key features.

1.3 Purpose

This OEMP and its supporting operational management plans (AxTRF management plans) have been developed in accordance with the conditions of approval, the management and mitigation measures for the development presented by Visy, and VMS. AxTRF management plans comprise:

- Operational Environmental Management Plan (this plan)
- Waste Management Plan (WMP)
- Traffic Management Plan (TMP)
- Air Quality Management Plan (AQMP)
- Noise Management Plan (NMP)
- Flood Evacuation and Emergency Response Plan (FEERP)

The purpose of AxTRF management plans is to provide an outline of the operational procedures that are applied to meet environmental requirements for stage 1 operation – recyclables transfer facility. It is applicable to all staff and contractors associated with the operation of the TRF. AxTRF management plans should be used in conjunction with VMS.

This OEMP and its attached management plans provide the overarching framework for environmental management of the facility. AxTRF management plans are prepared in accordance with requirements of condition C1 of SSD-10364 Environmental Management plans and include:

- Baseline data
- Relevant statutory requirements, limits and performance measures
- Description of measures to comply with relevant statutory obligations
- Program to monitor and report on impacts and environmental performance and effectiveness of management measures
- Remedial actions if monitoring identified impact or performance that need to be addressed and improved
- Protocol for management, reporting and response to any incidents, non-compliance with performance criteria or statutory requirements, and complaints
- Framework for periodic review of plans.

AxTRF management plans are available to all staff and subcontractors via the site management system document control which includes a hard copy onsite. They are made available to the public via Visy's website.

The site management team are responsible to ensure AxTRF management plans are implemented effectively and the operation meets its regulatory obligations and environmental performance targets (Section 4).

1.4 Review

AxTRF management plans will be reviewed as a result of:

- Changes to key personnel or resources
- Significant changes to site conditions and/or work methods
- Occurrence of a reportable environmental incident or near miss
- Identification of non-compliances with conditions of consent
- Changes to legal, contract or other obligations
- Improvement opportunities or corrective action from Visy's Internal Audit Program.

The review process will include looking at the environmental controls and procedures in use to make sure they remain effective. If the review process identifies a need to update the OEMP or other management plan, revisions will be approved by the Site Manager and documented. Updated plans will be made available and will be submitted to the Planning Secretary for approval as required by condition C10.

2 ENVIRONMENTAL OBLIGATIONS

2.1 Legislative requirements

As a modern recyclables facility, AxTRF is designed and operated to meet a number of relevant national, state and local government requirements, including in the areas of planning, environment, waste and resource recovery, and building and fire safety. The following provides an overview of the key environmental legislative requirements which underpin the facility design and operation.

2.1.1 Environmental Planning and Assessment Act 1979

The facility was assessed as State Significant Development (SSD-10364) under the *Environmental Planning and Assessment Act 1979* (EP&A Act). An Environmental Impact Statement (EIS) was prepared for the facility to satisfy the Secretary's Environmental Assessment Requirements (SEARs). Following public exhibition of the EIS, a Response to Submissions (RTS) was prepared to respond to issues raised and EIS assessment recommendations for further work. The RTS proposed design refinements and provided revised environmental mitigation and management measures as required.

Approval under the EP&A Act was granted by the Minister for Planning and Public Spaces on 22 April 2020 (SSD-10364). Under the terms of consent condition A2, the facility must be operated in accordance with the conditions of approval, the EIS and RTS, and the management and mitigation measures presented by Visy.

This OEMP is for stage 1 operation and is prepared in accordance with environmental management conditions C1, C5 and C6 and the *Guideline for the Preparation of Environmental Management Plans*. Condition C7 requires that operation must not commence until this OEMP and its attached management plans are approved by the Planning Secretary and that the operation must be in accordance with this OEMP.

This OEMP also addresses Reporting conditions C11, C12 and C13 regarding incident and non-compliance notification. Table 1 provides the approval conditions addressed in this OEMP.

Table 1. SSD-10364 approval conditions addressed by this OEMP.

Condition of consent (summarised)	**AxTRF plans reference**
C5. The Applicant must prepare an Operational Environmental Management Plan (OEMP) in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	OEMP 1.3
C6. As part of the OEMP required under Condition C5 of this consent, the Applicant must include the following:	
(a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	OEMP 4.1
(b) describe the procedures that would be implemented to:	
(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development:	OEMP 4.7, 4.8
(ii) receive, handle, respond to, and record complaints;	OEMP 4.9
(iii) resolve any disputes that may arise;	

(iv) respond to any non-compliance;	OEMP 4.6, 7.1
(v) respond to emergencies; and	OEMP 7.2
(c) include the following environmental management plans: (i) Operational Waste Management Plan (see Condition B4); (ii) Operational Traffic Management Plan (see Condition B15); (iii) Operational Air Quality Management Plant (see Condition B22); (iv) Operational Noise and Vibration Management Plan (see Condition B32); (v) Flood Emergency Response (see Condition B40); and (vi) Community Consultation and Complaints Handling.	OEMP 1.3 OEMP 4.9
C7. The Applicant must: (a) not commence operation until the OEMP is approved by the Planning Secretary; and (b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	OEMP 1.1
Incident Notification, Reporting and Response **C11.** The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	OEMP 7.1
Non-Compliance Notification **C12.** The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. **C13.** A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	

2.1.2 Protection Environment Operations Act 1997 and Waste Regulation 2014

The facility is a resource recovery and waste storage facility scheduled premises under the *Protection of the Environment Operations Act 1997* (POEO Act), which is administered by the Environment Protection Agency (EPA). The facility was issued Environmental Protection Licence 21359 on 20 October 2020 by the EPA.

Under the *Protection of the Environment Operations (Waste) Regulation 2014* (Waste Regs), the movement of recyclable waste materials to and from the facility is required to be tracked and recorded and a waste levy paid based on the amount of waste processed and stored. An overview of waste tracking at the facility is provided in Section 5.3.1.

2.1.3 Local Planning

The facility meets relevant requirements of local planning (ie. City of Sydney Local Environmental Plan 2012 and Development Control Plan 2012) and contributes to

meeting various aspects of waste management and recyclable targets within local planning strategies (ie. City of Sydney Local Strategic Planning Statement and Eastern City District Plan).

2.1.4 Waste Strategies

The facility contributes to meeting targets in a number of waste strategies (ie. National Waste Policy 2018 and NSW Waste Avoidance and Resource Recovery Strategy 2014-2021) by providing a strategically located modern dry recyclables material transfer and processing facility for Eastern Sydney and beyond. As part of Visy's integrated closed loop resource recovery and recyclable manufacturing, the facility contributes to Visy's recovery of recyclables from millions of households and workplaces and the manufacture of recyclable paper and packaging to create value from waste.

2.1.5 Fire Safety in Waste Facilities Guideline

The facility was assessed against the *Fire Safety in Waste Facilities guideline* (version 02 2019) through a Fire Engineering Brief (FEB) consultation process with Fire and Rescue NSW (FRNSW). The guideline is applicable to the facility as it is a waste facility development in NSW that involved a change of building use and building work intended to meet the National Construction Code. The purpose of the FEB is to ensure the development has adequate provision for fire safety and facilitates safe fire brigade intervention in order to protect life, property and the environment.

2.2 Visy Environmental Policy

Operation of the facility is undertaken in accordance with Visy's Environmental Policy, which is included in Attachment A.

2.3 Visy Management System

The AxTRF management plans are in line with VMS which is an integrated business management system, including safety, environment and safe transport that describes systems and processes to manage core business activities, risks, opportunities and stakeholder expectations and achieve continual improvement. VMS is based on the quality system structure of ISO standards using the Plan, Do, Check, Act approach as shown in Figure 2.

Environmental Monitoring and Compliance within VMS requires sites determine what needs to be monitored or measured with consideration of:

- Conditions within site or operation specific regulatory approvals
- Significant environmental risks from activities, products and services
- In response to pollution incidents or community complaints
- Evaluation against Environmental and Business objectives.

The site must establish processes to ensure the specified frequency of monitoring, the methods used, the criteria that compliance is measured against and the response to any deviations are implemented.

VMS also includes the Visy Safe Transport System which describes the minimum requirements to ensure obligation across the chain of responsibility under the Heavy Vehicle legislation are met.

The effectiveness of each site against the VMS requirements and regulatory compliance

is undertaken through Visy's annual internal audit program. Separate audits are undertaken for site environmental monitoring and safe transport. The audit results are used as lag indicators for communicating environmental performance to senior management and for identifying and prioritising environmental improvements across Visy.

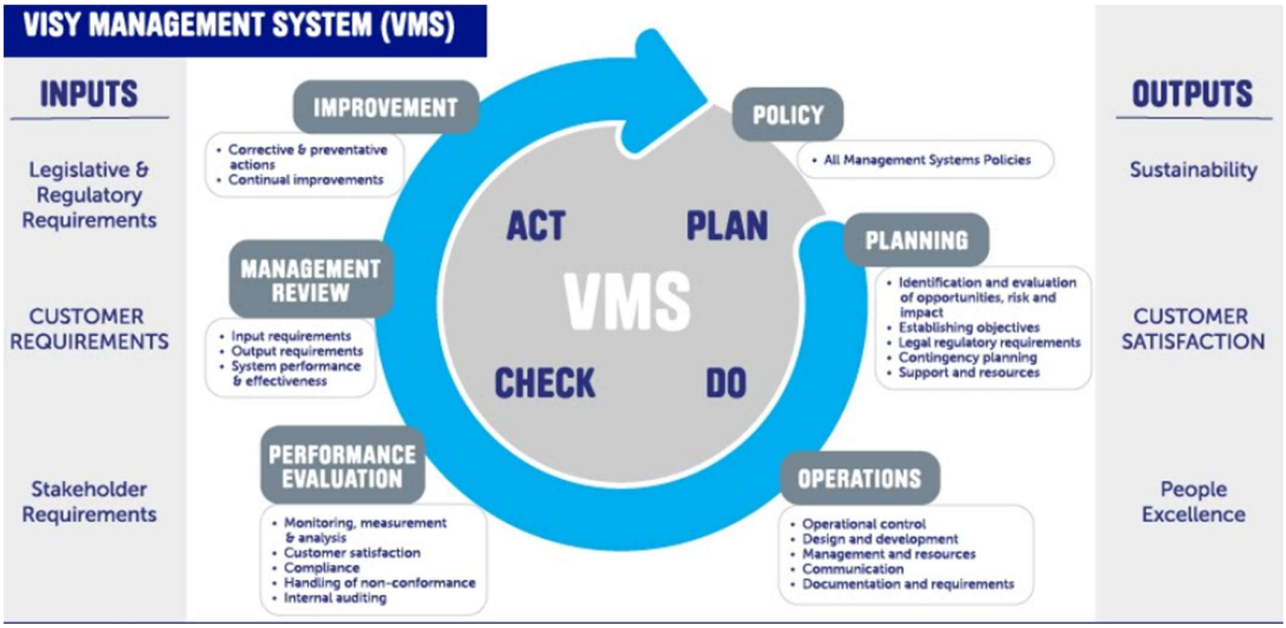


Figure 2. Visy management system structure.

2.4 Management and mitigation measures

AxTRF management plans incorporate conditions of approval and management and mitigation measures relevant to operation of the facility. These key conditions and management/mitigation measures are listed in a Register of Statutory Environmental Control Measures provided as Attachment B. Each statutory measure is identified as a design and/or operation control and an implementation reference within the AxTRF management plans is given. Design controls are implemented into the facility operation on an ongoing basis as they are incorporated into the facility design, layout and infrastructure. Operation controls are implemented through their inclusion in AxTRF management plans and site VMS requirements.

3 ENVIRONMENTAL OBJECTIVES AND PERFORMANCE

As a means of assessing environmental performance of the AxTRF, environmental objectives and performance indicators have been established and are provided in Table 2. These have been developed with consideration of key issues identified during the environmental impact assessment process for the development approval of the facility. In line with the VMS structure in Figure 2, the objectives and targets will contribute to informing training and communication to all site personnel and contractors, and form the basis for monitoring and implementing corrective actions.

Table 2. Objectives and Performance Indicators for stage 1 operation.

Objectives	Performance Indicators
• Operation in accordance with development approval and AxTRF management plans. • Identify potential environment impact sources and implement control measures. • Engage with neighbours to inform of site activities. • Maintain reasonable levels of noise amenity for surrounding businesses and residents. • Contain litter within the site boundary. • Minimise traffic impact to Burrows Road. • Respond quickly and effectively to issues or complaints. • Monitor environmental performance in line with VMS and AxTRF management plan requirements.	• Full compliance with all requirements. • Effective and practical environmental control measures implemented. • No impact to neighbouring businesses or surrounding residents from operation. • Appropriate actions undertaken to investigate issues and/or effectively respond to complaints. • Environmental performance meets expectations.

4 IMPLEMENTATION

Visy is committed to minimising the impact of our operations on the environment and the community and operate in accordance with all relevant legislation and licence conditions as a minimum and strive to continually improve performance. All site personnel and contractors must understand their accountability for effective environmental planning and risk management for AxTRF operation.

4.1 Roles and responsibilities

4.1.1 Site Manager

Visy assigns roles, responsibilities and authority based on the requirements of the site and reviews the effectiveness of site management and performance. The Site Manager has the primary responsibility and authority for the operation of AxTRF and is supported by the NSW State Operations Manager and NSW HSE manager.

AxTRF Site Manager has overall responsibility and authority for:

- Authorisation and implementation of AxTRF management plans.

- Daily management of facility operations.
- Supervision, administration and profitability of the facility.
- Management of the facility in accordance with AxTRF management plans.
- Monitoring of production costs, environmental impacts, and plant maintenance.

Environmental obligations include that:

- Environmental approvals and licences are in place and compliance is maintained.
- The Objectives and Performance Indicators set through this OEMP its supporting operational management plans (AxTRF management plans) are implemented and adhered to by site employees and contractors.
- Monitoring of compliance with the requirements of this OEMP, including controls and complaints handling, and corrective actions to address any non-compliance are undertaken.
- Review of this OEMP in accordance with triggers is completed.
- All incidents and complaints are responded to through reporting, investigation and implementing corrective actions as required.
- Records required by legislation are maintained, including waste tracking.
- Environmental issues are addressed using VMS and engaging specialist consultants where required.

4.1.2 Site Personnel

All personnel working at AxTRF have the following general obligations and are held accountable for compliance with them:

- Complete required inductions and comply with all site and Visy rules.
- Comply with Visy and site work practices and protocols.
- Ensure that plant and equipment conforms to Visy and site requirements.
- Prevent and minimise noise and dust pollution to neighbouring and surrounding businesses and nearby residential receivers.
- Prevent and minimise traffic impacts on Burrows Road and the surrounding road network.
- Prevent and minimise environmental pollution impacts including from litter and odour.
- Ensure compliance with the requirements of this OEMP and VMS requirements for the site and report any non-compliance to the Site Manager without delay.
- Report environmental and safety incidents, near misses or complaints to the Site Manager without delay.

4.1.3 Contractors

All contractors operating at the facility must comply with requirements of AxTRF management plans, including:

- Ensuring their personnel are inducted and are made familiar with the site.
- Complying with work methods/procedures stipulated for their particular work tasks.
- Ensuring that plant and equipment conforms to the requirements stipulated for the site.
- Meeting regularly with Site Management to discuss operational, safety and environmental management issues.

- Contractor's activities will be inspected from time to time to ensure compliance.

4.1.4 Visitors

All persons visiting the site have responsibilities including:

- Making themselves available for induction and familiarisation with the site.
- Signing in and out of site.
- Complying with the instructions of accompanying site personnel at all times.

4.2 Operating Hours and Workforce

The facility has operation activities 24 hours a day 7 days a week, though the nature of activities varies in line with the cycle of council collection of kerbside recyclables. FCM is received primarily during the period 5am to 2pm Monday to Friday, in line with council kerbside collection schedules, and primarily consolidated and dispatched at other times. Commercial P&C is received primarily during business hours Monday to Friday. The baler operates predominantly 6am to 10pm Monday to Friday, though limited operation may occur at other times.

The facility has about 28 staff, with 8 operations personnel during weekday shifts, typically a skeleton night and weekend shifts and office staff. The site office space is also used by other Visy Recycling management employees.

4.3 Inductions

All site personnel and contractors must complete the mandatory AxTRF inductions prior to commencing work. Any person visiting the site that is not inducted must be escorted at all times by an inducted person. The inductions include an environmental component to ensure all persons working at the site are aware of their responsibilities and the control measures for key environmental issues.

The 2 mandatory inductions for all AxTRF site personnel and contractors are:

- Visy - HSE - Induction (100-001)
- Visy Recycling - NSW - State Specific Induction (600-002).

Inductions for site personnel expire after 2 years and after one year for contractors/visitors. Inductions must be renewed after expiry to be valid.

Other activity specific inductions/training may also need to be completed depending on the tasks being undertaken by site personnel and contractors. The Site Manager or delegate will advise activity specific training required. For example, these could include:

- Visy Recycling – Operation of FEL – Standard Work Practice (SWP)
- Visy Recycling – Operation of Forklift – Standard Work Practice (SWP)
- Visy Recycling – Refueling of PME – Standard Work Practice (SWP)

Visy uses an online induction system. The instructions to register in the system and complete the online inductions will be provided by the Site Manager or delegate. These will include a web address and the following details required for registration:

- Vendor Number/Site Authorisation
- Vendor Name
- Site Name

- Visy Person Reporting To.

4.4 Site access

AxTRF is a secure site. All site personnel are issued with a swipe card and contractors may be issued with swipe cards by the Site Manager on request. A swipe card becomes invalid when any mandatory induction expires.

Site personnel and contractors access the site via swipe card gates on Burrows Road to the main carpark or from Euston Road for pedestrian and bicycle access only.

Trucks access the operations area via the truck entry rapid door (Section 5.3.1).

New personnel, contractors and visitors to the site must report to the office and sign in (if no swipe card issued).

A site tour will be provided by the Site Manager or delegate to ensure familiarity with the site and clear understanding of work tasks prior to commencing work.

Any person not inducted for AxTRF must be escorted and supervised by an inducted person. Smoking is prohibited in the operations area and is only permitted on site in the designated area.

AxTRF has facilities to encourage employees to cycle, walk or take public transport to work, including secure bike storage, showers and lockers. The site Green Workplace Travel Plan is included with Attachment D.

4.5 Training and Competence

AxTRF uses a competency based training system for the operation of plant and equipment, including for incident and emergency response. It also incorporates environmental obligations and relevant operations protocols aimed to remove or reduce environmental impacts to Burrows Road, neighbouring premises, and nearby residential areas.

Awareness of environmental impacts and controls is also incorporated via VMS requirements and into toolbox talks.

4.6 Hazard, Incident and Non-compliance Reporting

AxTRF uses Vault to report all events (incidents, injuries, illness, near misses), hazards and non-compliances in line with VMS requirements. Vault is Visy's risk management database that stores reported events, hazards and non-compliances and provides a tracking tool and data source for trends and performance reporting.

All site personnel and contractors must report any safety or environmental hazard, accident, incident or near miss to their immediate supervisor or the Site Manager and take appropriate measures to eliminate or control the risk in line with VMS requirements. Where reasonably practical control measures cannot adequately resolve the risk immediately, the affected plant, process or area must be isolated until action has been taken to address the risk.

In addition, any non-compliance with requirements of VMS, AxTRF management plans (which incorporates conditions of approval) or the EPL must be reported to the Site Manager as soon as practicable. The recording and investigation of all reports will be in a timely manner and in line with the VMS incident reporting procedure which is displayed on

the site notice board.

4.7 Annual Return

An Annual Return in accordance with the facility EPL 21359 Annual Return Documents conditions is completed and provided to the EPA within 60 days after the end of each reporting period. The Annual Return includes Statements of Compliance for:

- License Conditions, including the recording of complaints
- Pollution Monitoring Data required by the EPL
- Environmental Management Systems and Practices
- Preparation of a Pollution Incident Response management Plan

4.8 Stakeholder engagement

Neighbouring businesses consulted as part of the EIS will be informed regarding the stage 1 operation in accordance with condition of approval B53. This will include sending a notification letter advising:

- Commencement of operation
- Overview of key design environmental mitigation controls
- Overview of key operations environmental impact mitigation controls
- Environmental Protection Licence number
- Contact information for Site Manager and Visy
- Information on access to management plans and monitoring reports.

Follow up communication will be undertaken with the child care centre and other neighbouring businesses that seek further communication. On request, neighboring businesses can be provided with an environmental performance report, which will also be available via the Visy website as detailed below.

Information about the facility will be available on the Visy website in accordance with condition C20. This will include:

- Statutory approval and environmental assessment information for the development
- OEMP and its Attached management plans
- The monthly construction environmental performance report, including a summary of the progress of the Project.

This OEMP and its attached management plans (as well as the EIS, RTS and development approval) are also available via the project's webpage in the NSW Planning Portal (see address in section 4.9).

4.9 Complaints Procedure

Complaints regarding environmental impacts of the facility can be made in a number of ways:

1. Direct to Visy via the phone number provided on the site signage which is a Visy Recycling complaints hotline
2. Via the EPA 'Environment line' phone number
3. Via the DPIE NSW Planning Portal project webpage (https://www.planningportal.nsw.gov.au/major-projects/project/20936)

Complaints made to EPA and DPIE may be forwarded to Visy as determined by the EPA and DPIE. A complaint received by Visy is recorded, including the complainant's name, phone number and address (if provided) and description of the issue. The complaint record is then passed onto the Site Manager and put into the site complaints reporting register.

The Site Manger will then undertake (or delegate) an investigation of the issue to determine whether the facility operation is the probable cause. For air quality complaints, the investigation will include obtaining weather and air quality data from nearby OEH and BoM monitoring stations. If action is required from the facility, a contingency plan is developed, including appropriate corrective actions and a timeframe to address the issue. The complainant will be updated on actions taken to resolve the issue as requested and if a contact phone number has been provided. The information will be recorded in the environmental reporting register.

In rare circumstances, an environmental complaint may not be able to be resolved through this procedure and may be elevated to a dispute that is referred by Visy or the complainant to the relevant regulatory authority (typically EPA). Under these circumstances it becomes a regulatory matter and the Site Manager must notify the Visy National Environment Manager who will liase with the regulatory authority to determine an action plan to address the matter.

5 OPERATIONS

5.1 Facility Design

AxTRF is a modern dry recyclables facility that was designed and approved in accordance with current requirements and expectations for a resource recovery and waste storage facility. This includes that the facility has incorporated a range of design engineering controls to provide high level mitigation for key environmental aspects. Key design controls required by the development approval and that have been constructed into the facility are identified in Attachment B. These controls are implemented into the facility operation on an ongoing basis as they are incorporated into the layout and infrastructure. Key design controls include:

- Operations fully contained within the operations building with authorised access only and rapid doors at entry and exit that open to permit truck passage and close immediately afterwards.
- Building ventilation system comprising:
    - 2 fans above the inbound weighbridge and 1 above the outbound weighbridge discharging to 3 roof exhaust vents via acoustically shielded ductwork; and
    - Fresh air inflow via 3 disused doorways, 2 on Euston Road and 1 on Burrows Road, all fitted with acoustic louvres to allow the required air inflow while minimising noise emission.
- No stormwater connection to inside operations building (drainage pits sealed) and flood protection measures for electrical equipment and plant.
- One way traffic flow through the facility with separate entry and exit doors, inbound

and outbound weighbridges, and FCM and P&C receival bays to promote efficiency and minimise time on site for recyclable trucks. Contingency internal staging area.

- Fire management system based on *Fire Safety in Waste Facilities guideline* developed through FEB consultation process with FRNSW and including bunding around the operations area to retain fire water.
- Landscape retention of existing native trees on Euston Road frontage and within site and replanting of native trees to replace trees to be removed.

Operations controls, which are also identified in Attachment B, are implemented into the facility operation to provide supporting and residual mitigation for environmental aspects. Key environmental operations controls are overviewed in Section 5.3.

5.2 Facility Layout

The operations area layout within the building is shown in and a general description of the operation areas identified is provided in this section.

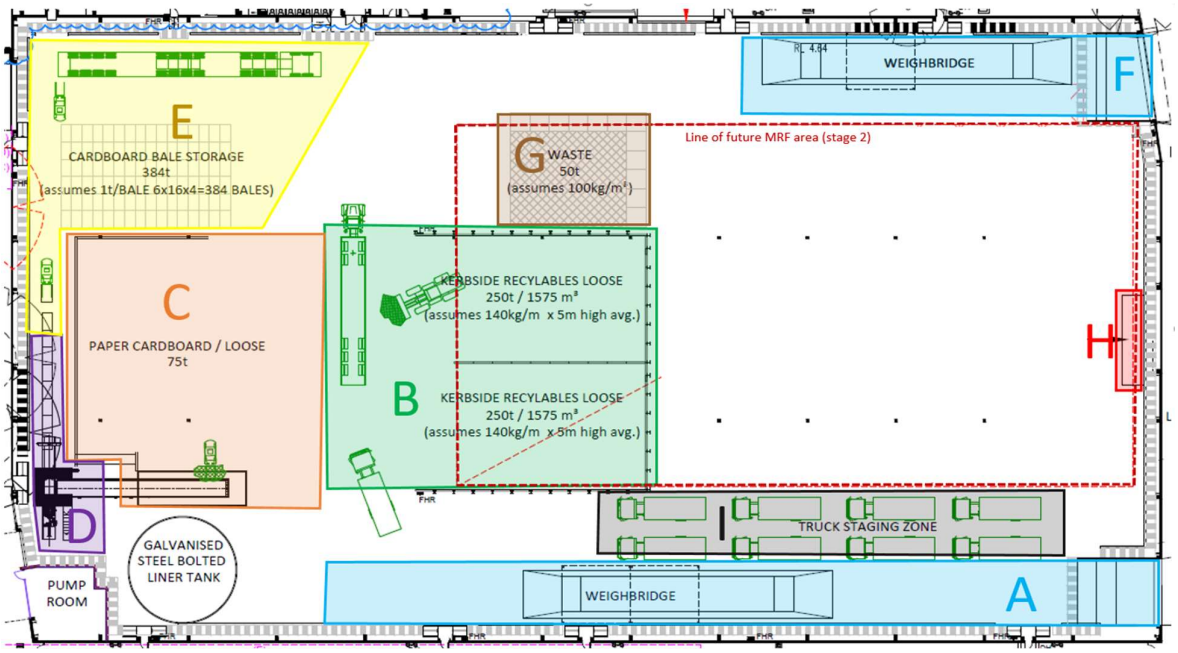


Figure 3. Operation building layout showing operation zones.

Pedestrian Walkway

A designated pedestrian-only walkway rings the facility and incorporates barriers for physical separation from PME in line with the *Visy Minimum Standards for Powered Mobile Equipment (PME)*.

Pedestrians must only use designated walkway when moving around the operations area.

Zone A - Truck entry and inbound weighbridge (blue)

Kerbside recyclable collection trucks and small commercial paper/cardboard collection

trucks enter from Burrows Road via rapid door and travel onto the inbound weighbridge. After being weighed, trucks continue to zone B or C.

Zone B - FCM receival bay and handling (green)

Kerbside recycling collection trucks unload into the FCM kerbside recyclables receival bay and then continue to zone F. The Front End Loader (FEL) moves FCM within the receival bay or loads FCM into bulk haul trucks.

The FCM receival bay area is an Authorised Access Area (AAA) and the FEL operator has complete control over all movements in the AAA. The AAA is clearly identified by signage and black and yellow hatching lines on the floor and at all pedestrian and vehicle entry points.

Zone C - Paper/cardboard receival bay and handling (orange)

Paper/cardboard collection trucks unload loose paper/cardboard into the paper/cardboard receival bay then continue to zone F. A forklift with grab attachment pushes loose cardboard/paper onto the baler conveyor to feed the baler.

Zone D - Baler (purple)

Baler compacts and secures paper/cardboard into wire-bound bales.

Zone E - Paper/cardboard bale storage and loading (yellow)

Paper/cardboard bales are moved via forklift to the paper/cardboard bale storage. Bales are loaded onto bulk haul trucks for transport offsite.

Zone F - Truck outbound weighbridge and exit (blue)

Trucks travel onto the outbound weighbridge and are weighed before exiting the facility onto Burrows Road.

Zone G - Non-recyclable waste storage (brown)

Items removed from FCM as non-recyclable waste are placed in this waste area for disposal.

Zone H - Hazardous waste storage (red)

Hazardous items removed from FCM as waste are sent to the dedicated hazardous waste storage area and stored within bunded pallets, IBCs or pallecons depending on the type of material. These are elevated on raised pallet racking above the 1% AEP flood level.

Zone I - Overflow truck staging (grey)

If required, delivery trucks can be diverted from traveling onto the inbound weighbridge and into the overflow truck staging area. This is an engine off area and is used only in the event of a short term delay to unloading. At the direction of site management, a truck can restart and resume delivery.

5.3 Activity protocols

Visy uses VMS to set a minimum standard applicable across all Visy sites and provide a framework for sites to conduct operations using processes that are planned and controlled and take action to mitigate the effects of unintended consequences of change. This includes recurrent (or routine) work practices, where practicable, being managed by risk and documented operating procedures which consider the elements of the task to be

completed and the quality, safety and environmental aspects.

Key activity protocols relevant to environmental management for AxTRF are provided in this section.

Everyone who is to work at or visit Visy Alexandria TRF is to be inducted or supervised.

5.3.1 Waste tracking

Prior to trucks arriving at the facility each vehicle must have its own unique scancard. All trucks must travel over both the inbound and outbound weighbridges and the driver must scan their issued scancard across the electronic reader. Once scanned, the weighbridge will issue a receipt, confirming vehicle details and current weight. Boom gates at each end of the weighbridge control truck entry and exit to permit only one vehicle on the weighbridge at a time.

If the scancard reader is out of service or the truck's scancard has been misplaced, the truck driver should use the weighbridge phone to contact the Visy weighbridge team and provide their scancard number or registration. The weighbridge team will manually enter information into the system and issue a receipt.

Manual Dockets are to be issued when the weighbridge PC or communications are out of service.

Using information gathered at both weighbridges, the weighbridge recording system will automatically log the following information for each truck in Visy's Systems Application and Products (SAP) data system:

- Site designation & name
- Date and time
- Carrier
- Customer (Source or Destination)
- Purpose of entry (transaction type)
- Vehicle registration number
- Weight of vehicle (Tare)
- Amount of material (Gross - Tare)
- Material type

All trucks must use the inbound and outbound weighbridge and unique scancard.

5.3.2 Traffic flow

All trucks must travel through the facility following the one-way traffic flow only and exit onto Burrows Road in a forward direction. Entry and exit is permitted only through the designated doorways which are fitted with rapid doors, which remain closed and open only to permit passage of a truck.

All trucks must travel through the facility as efficiently as possible and must exit the facility promptly after unloading. The facility has space to accommodate 5 incoming trucks waiting to unload plus 2 trucks in the FCM AAA receival bay and 1 in the P&C receival bay.

Queuing of incoming trucks on Burrows Road is to be prevented under any circumstances. If, for some reason, the inbound queuing space is not sufficient due to a short term disruption in traffic flow, site personnel are to direct incoming trucks to the

overflow staging area North of the entry weighbridge. This can accommodate 8 trucks on a short-term basis only. This is an engine off area and trucks must be directed to turn off their engine.

All trucks exiting the facility must give way to Burrows Road traffic and adhere to road rules. Trucks must travel efficiently away from the facility and must not stand or park on Burrows Road.

All drivers must adhere to the Alexandria TRF Driver Code of Conduct.

5.3.3 Material handling and storage

Loose FCM and P&C must only be stored in the respective receival bays at a height not exceeding the receival bay walls.

Daily stocktake of product and bales includes inspection to ensure volumes do not exceed the storage capacity (500 tonnes loose FCM, 75 tonnes loose P&C and 384 tonnes baled P&C),and that P&C bales are stored in their designated area only and according to the facility stacking protocol.

Contaminated material is removed and taken to the waste area and managed as appropriate for the material ().

Hazardous material items are taken to the hazardous waste area and managed as appropriate for the material (WMP).

Diesel and hydraulic oil for PME must only be stored in their designated areas and containers, with diesel in the self bunded diesel storage tank and hydraulic oil on a bunded pallet.

Any cleaning fluids and flammable liquid must be stored in their designated cabinets and containers.

5.3.4 FCM unloading

Kerbside recycling trucks must unload to one of the two FCM receival bays. The FCM receival area is AAA as this is where the FEL operates and Visy mandatory rules for FEL operation in AAAs apply. The AAA is clearly identified by signage and black and yellow hatching lines on the floor and at all pedestrian and vehicle entry points. The FEL operator has complete control over all movements in the AAA.

If a truck or PME requires to enter the AAA, they must contact the FEL operator via 2way radio and wait for permission to enter. The FEL operator controls access to the AAA and the visiting driver must maintain radio contact with the FEL operator and both vehicles must maintain a 10-metre separation distance.

FCM trucks can unload two at a time, one in each FCM receival bay (noting AAA FEL requirements). Trucks should reverse into a bay, unload and then leave to the North following the one-way traffic flow. Trucks should not dally in the FCM receival bay and must move through the facility as efficiently as possible.

During peak periods for incoming FCM, the FEL should give priority to unloading efficiency and ‘stand down’ as required so as to minimise queuing of kerbside recyclable trucks within the facility.

All FCM must be unloaded as efficiently as possible and truck time on site minimised.

5.3.5 FCM consolidation and dispatch

FCM must be loaded into walking floor bulk haul trucks and removed from site on a daily basis and should be managed to ensure no FCM is retained onsite for longer than 48hrs. While FCM loading is underway, only the other receival bay can be used for unloading. The FCM receival bay area is AAA and Visy mandatory rules for FEL operation in AAAs apply. When bulk haul truck loading is occurring, the truck driver must remain in the cab, on the Category 1 pedestrian walkway or in the break room. The truck engine must be switched off during loading in accordance with signage.

FCM loading must not cause delays to FCM unloading by kerbside trucks. During peak hours for incoming kerbside trucks both FCM bays should be available for unloading to maximise efficiency and reduce time onsite for trucks.

FCM bulk haul trucks must have engine off during loading.

5.3.6 P&C unloading and bale storage

P&C trucks must unload to the P&C receival bay one at a time. Trucks must reverse into the bay, unload, and leave facing North following the one-way traffic flow. Trucks must not dally in the P&C bay. While a truck is unloading, the forklift may operate in the area as long as it remains 3m from any persons and the truck.

The forklift operator pushing the loose P&C onto the baler conveyor must be vigilant for trucks unloading in the P&C bay and any persons.

The P&C bales from the baler must be moved to the P&C bale storage area and stacked in accordance with the AxTRF bale stacking procedure. This procedure is in line with the *Fire Safety in Waste Facilities guideline* and contributes to the fire safety of the facility.

P&C bales must be stacked in accordance with bale stacking procedure.

5.3.7 P&C bale loading and dispatch

The loading of P&C bales onto haul trucks for dispatch must occur in the bale loading zone only. Truck drivers are to remain in the truck or in a pedestrian only zone (walkway or office) while loading and the truck engine must be switch off in accordance with signage. Drivers are never permitted to strap a load while a forklift is loading the truck.

Bale trucks must have engine off during loading.

5.3.8 Refuelling PME

A self-contained bunded diesel storage tank (2000 L) is on-site for refuelling PME. Spill kits are nearby for use in the event of any minor spill. Refueling must be in accordance with the Refueling of PME SWP.

Any fuel spill must be immediately cleaned and reported.

5.3.9 Accepted Recyclable Materials

The facility only accepts FCM from municipal kerbside collections that is typically specified to Councils to include:

- Paper (such as newspapers, magazines, stationery, office paper)
- Cardboard (except waxed cardboard)

- Glass bottles and jars (such as beverage bottles, glass condiment jars)
- Aluminium (such as cans and foil balls)
- Steel and aerosol cans (such as food tins, aerosol cans)
- Rigid plastic packaging including numbered 1 to 7 (not Polystyrene foam).

The facility only accepts P&C from commercial collections that is typically specified to collectors to include:

- Office paper – white and coloured – whole and shredded
- Envelopes, stationery and manila folders
- Cardboard
- Newspaper, magazines and brochures
- Telephone books.

The loader operator should visually inspect FCM in the receival bay for large items or large quantities of items of unacceptable waste (see below section). Where individual items are identified, these are removed and taken to the waste area and managed as appropriate for the material.

Where a large quantity of unacceptable waste is identified, such as garden waste or bagged material around 15% or more of the load, the load should be isolated in the FCM receival bay and the Site Manager informed. The incident must be recorded, with the material/s of contamination identified, the load photographed and the truck from which it came identified (or a number of possible trucks). The contaminated material should be removed from the FCM bay as soon as practicable and taken to the waste area and managed as appropriate for the material. Typically, the waste owner (i.e. Council of origin) will be contacted to advise of the contamination and may be required to contribute to removal and disposal costs.

5.3.10 Contamination (Unaccepted Materials)

The majority of Visy's contracts with municipal and commercial operators include rejection procedures in the event that a load of recyclable waste contains gross contamination (typically unacceptable waste being greater than 15% of the load) or hazardous material.

For FCM, *contamination* includes but is not limited to:

- Putrescibles and organics, ie. garden waste, food scraps
- Metal other than household containers, ie. wire, pipes, beams, white goods
- Building materials, ie. timber, fibre cement, windows, bricks
- Excavation material, ie. soil, rocks, concrete
- Expanded plastics, ie. polystyrene boxes, foam
- Textiles and fabric, ie. old clothes, cleaning rags, shade cloth
- Non-recyclable household waste, ie. crockery, children's toys (dolls, scooters, balls), shoes, personal hygiene products, garbage bags with mixed contents.

For P&C, *contamination* is anything that is not paper or cardboard, including all the above as well as:

- Household containers that are metal, plastic or glass, ie. tins, cans, fruit punnets, bottles and jars
- All soft and hard plastics, ie. shopping bags, biscuit/chip packaging, office display folders.

Contamination can have a range of impacts to the facility's operation or to Visy's MRFs in

processing the FCM and paper mills in processing the P&C. This can include process blockages and equipment damage, health and safety hazards, and odour.

Contaminated material is removed and taken to the waste area and managed as appropriate for the material.

Contamination Audits

Physical contamination audits for FCM are conducted on a mutually agreed basis from an agreed random sample that is representative of the municipality. These are in addition to any obligations under the Contract, but may be timed to coincide with such contractual obligations to avoid duplicated cost.

Physical Audit Procedure

Representative, random loads will be separated and audited to individual product streams including, Recyclables, Non-Recyclables (Contaminants) and crushed Glass (Fines) and expressed as an estimated percentage of total load by weight.

Council and Visy share the full cost of the physical audits.

Council staff are invited to participate in the audit procedures.

5.3.11 Hazardous Materials

Hazardous Materials are not accepted at AxTRF. These include but are not limited to:

- Free flowing liquids or viscous materials, ie. fuels, chemical drums
- Explosive materials or materials with potential to explode, ie. flares, dynamite, bullets or shotgun cartridges
- Radioactive material or suspected radioactive material, ie. items with the radiation symbol
- Prescribed wastes (those wastes which are designated by law to be disposed of and not recycled), ie. oily rags, chemical containers
- Medical or potentially infectious wastes, i.e. Hospital waste, sharps disposable containers
- Combustible or potentially combustible materials, ie. shock absorbers, gas bottles
- Asbestos fibre board or suspected asbestos containing material, ie. cement sheeting.

In the event that any hazardous materials, or suspected hazardous materials, is identified during inspection of FCM by the loader operator, the process should follow that for other unacceptable materials. Where individual hazardous items are identified, these are removed and taken to the hazardous waste area and managed as appropriate for the material.

Where a sizable quantity of hazardous waste is identified, the load should be isolated in the FCM receival bay and the Site Manager informed. The incident must be recorded, with the hazardous material identified, the load photographed and the truck from which it came identified (or a number of possible trucks). The hazardous material must be removed from the FCM bay as soon as practicable and taken to the hazardous waste area and managed as appropriate for the material. Typically, the waste owner (i.e. Council of origin) will be contacted to advise of the contamination and may be required to contribute to removal and disposal costs.

6 ENVIRONMENTAL MANAGEMENT

6.1 Environmental Risk Assessment

Risk management is the basis of VMS and is an integral part of Visy processes. It provides a means to identify and control potential risks, opportunities and hazards associated with business activities and can facilitate more informed decision making. Visy's risk management process is captured in Figure 4. It is based on ISO 31000 principles to achieve a systematic application of management policies, procedures and practices to the activities of identifying, analysing, treating, monitoring and reviewing risk.

Visy conducts risk assessments using various tools (methods). The extent of rigor and formality is determined based on the complexity and/or criticality of the issue to be addressed. VMS provides a range of risk management tools to support risk assessment.

6.2 Environmental Aspects and Impacts Register

Visy uses a site environmental aspects and impacts register (A&I Register) as the primary document to record environmental risk and identify hazards requiring specific operational risk assessment.

AxTRF A&I Register includes relevant environmental aspects and impacts from the EIS and identifies applicable statutory operational control measures listed in Attachment B. It includes the following key aspects:

- Noise
- Air quality
- Odour
- Waste management
- Litter
- Flies and Vermin
- Traffic
- Flooding.

AxTRF A&I Register is a live document and the current version is available on the site management system document control. It is reviewed in line with circumstances given in Section 1.4 for the review of AxTRF management plans or annually as part of the management review process.

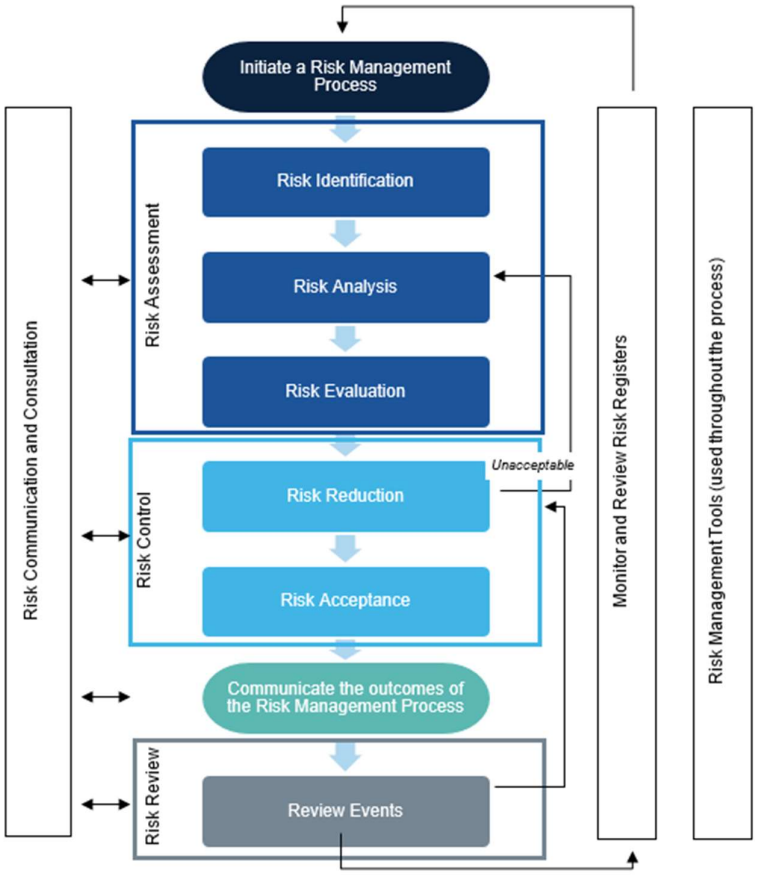


Figure 4. Visy's risk management process.

6.3 AxTRF Environmental Site Management Plans

This OEMP is the primary environmental management document for the operation of AxTRF stage 1 which provides the overarching framework for environmental management. Together with its attached management plans (AxTRF management plans; Section 1.3), these fulfil the requirements of approval condition C6 and incorporate requirements of relevant conditions of approval and management and mitigation measures for the development presented by Visy (Attachment B). AxTRF management plans should be used in conjunction with VMS.

The site Pollution Incident Response Management Plan (PIRMP), which is required under the EPL, is a stand alone document that is in line with PIRMP guideline and VMS minimum standards. It outlines the procedures in place to minimise the risk of a pollution incident and the external notification of relevant people and authorities. The Emergency Response Plan (ERP) is also a standalone document that is in line with VMS minimum standards. It outlines the facility management systems and resources to deal with an emergency to protect people, property and the environment. A brief overview of pollution incident and emergency management is provided at Section 7, however neither the PIRMP nor ERP is included as an attachment to this OEMP. Notwithstanding, numerous

controls across the site address health/safety and/or pollution and emergency management in addition to environmental management. For example the ventilation system, which includes emergency smoke exhaust, and hazardous materials management, which includes flood inundation protection.

The Safety Management framework is separate and focuses on workplace health and safety in accordance with legislative requirements and VMS.

7 Incident and Emergency Management

7.1 Incident Management

AxTRF reports and manages safety and environment incidents in line with VMS requirements. Incidents are recorded into the Visy Vault management system as described in Section 4.6. Incident response training for spills or environmental issues is incorporated into Visy's competency based training system (Section 4.5).

Spill kits are located strategically around the site for use in the event of a spill.

AxTRF is covered by a PIRMP that outlines notification procedures for external authorities, including that DPIE must be informed immediately for any notifiable incident and within 7 days on becoming aware of any non-compliance with any condition of approval, in accordance with conditions C11 and C12. DPIE notificiation should be via email to compliance@planning.nsw.gov.au.

7.2 Emergency Response

AxTRF is covered by an ERP that is communicated to all site personnel and contractors through the site induction. It incorporates the Visy minimum standards that define the requirements for sites to develop emergency preparedness and response plans, which includes:

- Assess the risks of all potential emergency scenarios
- Identify the potential for immediate risk to health, life, environment or property
- Ensure emergency personnel trained in the emergency response procedures
- Establish procedures to notify and update any relevant stakeholders including emergency organisations, authorities, neighbours or other community members on the emergency situation
- Conduct regular drills to test the plan against potential emergency situations
- Conduct a review of the plan on an annual basis or after any emergency situation.

The ERP includes the location of evacuation assembly point/s, emergency equipment and appropriately allocates key roles and responsibilities for an emergency situation. Relevant emergency services phone numbers are included. An overview of the emergency response plan evacuation assembly point/s and emergency equipment is displayed in key locations throughout the site.

The ERP also includes protocol for fire water management, including testing and discharge via sump pumps in the weighbridge pits, and emergency response training which is incorporated into Visy's competency based training system (Section 4.5).

8 MONITORING AND REVIEW

8.1 VMS Monitoring Requirements

VMS requires that the site determine what processes need to be monitored and measured based a range of factors including:

- Outcomes from the various Risk Management processes
- Evaluation of environmental compliance against legal or regulatory requirements
- Outcomes from internal audit findings and management reviews.

A Visy internal audit is undertaken annually to monitor the effectiveness of each site against the VMS requirements and regulatory compliance. This includes an audit against the Visy Safe Transport System. The audit results are used as lag indicators for communicating environmental performance to senior management and for identifying and prioritising environmental improvements across Visy.

8.2 Site Inspections

The implementation of this OEMP and its attached management plans (AxTRF management plans) will be monitored through both formal and informal inspections.

8.2.1 Observations and communications culture

VMS encourages a culture of ongoing regular and informal observations and communications to reinforce systems and behaviours. This is implemented through programs including the Safe Behaviour & Compliance Audit program outlined in Section 8.2.3 and the 10 Lifesaving Rules program, for which the relevant AxTRF Visy Recycling poster is provided at Attachment E. These programs provide a positive and visible leadership interaction between managers, supervisors and workers to empower workers to speak up for safety, and practises that can be done better.

All Visy sites utilise the culture of ongoing observation and communication to identify hazards and non-compliance with operations procedures or regulatory requirements as a means of ongoing monitoring of safety and environmental performance. These include regular site walkovers by the Site Manager or delegate and ongoing vigilance by all workers. The extent of rigor and formality used to address an identified hazard or non-conformance is determined based on the complexity and/or criticality of the issue. Low level hazards or non-conformances may be simply addressed immediately with no further action required, while higher level hazards or any non-conformance with regulatory requirements or mandatory safety rules must be formally reported, addressed and investigated.

At AxTRF example low level hazards could include a small amount of material escaping the receival bay or a bulk haul truck being loaded with engine running. These can be addressed immediately and informally, if safe to do so, and no further action taken. Example higher level hazards or operations exceptions could include breaching AAA rules, a refueling spill, or a contaminated load in the FCM receival bay. These must be reported, entered into Vault and formally addressed as described in Section 4.6.

8.2.2 Daily stocktake

A daily stocktake is undertaken by the Site Manager or delegate. This includes reconciling

FCM and P&C volume received and dispatched.

8.2.3 Safe Behaviour & Compliance Audit

A Visy Recycling Safe Behaviour & Compliance Audit will be completed at least fortnightly for AxTRF by the Site Manager or a delegate. The SBCA is provided at Attachment F. The completed audit and any required follow up actions will be entered into Vault.

8.2.4 Environmental Audit

An AxTRF environmental audit will be completed biannually or after any significant environmental event or change of site conditions by the Site Manager or delegate. The audit ensures a regular formal inspection and record of key statutory environmental control measures (ie. from Attachment B) and additional key protocols contained in the AxTRF management plans. The environmental audit form is provided at Attachment G. The completed audit and any follow up actions will be entered into Vault.

8.3 Non-conformance and Contingency plans

Where a performance indicator is not satisfactory or the environmental checklist identifies an inadequate control measure, the non-conformance will be recorded into Vault and a review of the environmental aspect management and mitigation controls will be undertaken to determine their effectiveness. A contingency plan will be developed including appropriate corrective actions to ensure controls are effective and/or additional controls are put in place.

8.4 Record keeping and Reporting

Records of all environmental inspections, performance reviews and other relevant environmental records are kept to demonstrate environmental due diligence and compliance with this OEMP and conditions of approval. These include:

- Site inspections
- Non-conformance and contingency plans
- Complaints
- Environmental incidents and response actions
- Safety data sheets and chemical registers
- Waste classification

The annual Visy internal audit will include review of AxTRF environmental performance and any non-conformances and resulting corrective actions. It will also include any issues or complaints received and investigation and corrective actions in line with the protocol described in this OEMP.

ATTACHMENT A

VISY ENVIRONMENTAL POLICY

ENVIRONMENT POLICY

VISY'S COMMITMENT TO SUSTAINABLE DEVELOPMENT MEANS WE TAKE A WHOLE OF PRODUCT LIFECYCLE APPROACH TO ENSURE OUR ACTIVITIES, PRODUCTS AND SERVICES ENHANCE THE ENVIRONMENT IN THE COMMUNITIES IN WHICH WE OPERATE.

We work with customers, suppliers and service providers, governments and the community to develop innovative products, recycling solutions and services that:

- Reduce waste and greenhouse emissions;
- Consider and minimise the lifecycle impacts of our products and activities;
- Source sociably responsible and sustainable products and services;
- Efficiently utilise natural resources;
- Protect and prevent any adverse impacts to the environment;
- Meet community aspirations for a sustainable future.

Within our own operations we will:

- Remain informed about the legal, internal and external factors which influence our environmental performance; to ensure we comply with all applicable environmental laws, regulations and standards, as well as our voluntary commitments to our communities and stakeholders;
- Take account of environmental factors, risk profiles and influences in business planning;
- Identify and manage environmental risks from our operations and any upstream or downstream processes; to apply or influence best practice environmental principles. These upstream and downstream processes shall include outsourced activities such as transport, waste disposal, as well as procurement of goods and services;
- Use natural resources responsibly and minimise the environmental impacts of our manufacturing processes;
- Promote environmental sustainability of our fibre inputs through maintaining the PEFC and FSC certification of our paper products;
- Reduce our carbon emissions through energy efficiency and the use of cleaner energy technologies;
- Implement and use our HSE Management System throughout the organisation to plan, document, measure and monitor environmental performance; including setting, assessing and reviewing the environmental objectives;
- Engage at all levels of the organisation and with other stakeholders; to communicate this policy and key aspects of the HSE Management System, as well as making this policy available to the general public; and
- Continually improve performance through training, management review, research and development; and consultation with government bodies, communities, industry groups, customers and other stakeholders.

We are committed to continually improving our environmental performance and minimising our impacts on the external environment, and it is the responsibility of all levels of the organisation to give effect to these values.

Anthony Pratt
Executive Chairman

Mark De Wit
Chief Operating Officer

VISY
FOR A BETTER WORLD

May 2017

ATTACHMENT B: REGISTER OF STATUTORY ENVIRONMENTAL CONTROL MEASURES

Table 1. AxTRF Operational Environmental Control Measures from SSD-10364 Appendix 3.

Note, the order of the control measures is revised (and duplicated measures are combined) to provide a logical sequence of primary design measures which are implemented by means of being incorporated into the facility design, followed by operation measures which are implemented through inclusion in AxTRF management plans and activity protocols.

AxTRF Design controls (stage 1 operation)	Implementation
Contain all operation activities and waste material within fully enclosed building.	OEMP 5.1 WMP 3.3 TMP 4.2 AQMP 4 NMP 4.2 FEERP 2.1
Install rapid doors to open only to permit vehicle passage and help prevent odour and litter escaping outside the building.	
Install weatherproof acoustic louvres on 3 unused doorways to permit required ventilation air intake while minimising noise emissions.	
Install vehicle exhaust system for the facility that provides point source air emissions via three roof vents with exhaust stacks at approximately roof ridge height and no fugitive emissions from the facility.	
Install acoustic shielding for ventilation fan ductwork.	
Seal drainage pits within the operations building to eliminate connection with stormwater drainage system.	
Raise all electrical equipment/machinery that cannot withstand water inundation within the warehouse above the 1% AEP flood level.	
Install impermeable bunding of operations building to contain any fire water.	
Install the fire management system [determined through the FEB consultation process with FRNSW].	
Site design and traffic flow and management aimed at minimising time onsite for recyclable collection trucks to unload and exit the facility.	
Provide internal staging area for use in extreme cases with signage directing truck drivers that engines are to be turned off in the staging area inside the building.	
Retain all substantial existing plantings along Euston Road and ensure no greater than ‘low impact’ on the tree protection zones (TPZs).	
Retain two substantial trees and other existing landscaping within the Burrows Road car park area.	
Introduce new landscaping trees in north-western corner of the site to replace three Celtis sp [declared weed] trees to be removed.	

ATTACHMENT B: REGISTER OF STATUTORY ENVIRONMENTAL CONTROL MEASURES

Contain all waste material within fully enclosed operations building in designated material type areas only, in particular for hazardous waste such as gas cylinders and flares.	WMP 3.4
Provide bicycle parking and end of trip facilities and develop a Workplace Travel Plan to encourage employees to utilise more sustainable forms of commuting to and from the facility.	OEMP 4.4 TMP 1.6
Construct a new roof of a material to complement the existing building and have a light colour with low reflectivity.	Complete
Use recessive colour and materials to minimize visual impacts of new rapid roller doors and acoustic louvres.	
Install new external light fittings in such a way that directs light downwards to minimise impacts on adjacent users.	
AxTRF Operational controls (stage 1 operation)	**Implementation**
Implement operation procedures to minimise noise from mobile plant as far as practicable.	NMP 4.3.3
Investigate use of non-audible mobile plant warning system ie. visual blue light identifying 3m zone rather than audible reversing beeper.	
Display site contact details and establish complaints register and protocol.	OEMP 4.9
Undertake noise compliance monitoring to verify noise performance against impact assessment.	NMP 4.5
Refuse putrescible waste onto the site and if any such contamination is found, promptly remove the putrescible.	OEMP 5.3.9 & 5.3.10 WMP 3.4
Accept only dry recyclable waste material onto the site with no onsite stockpiling other than in accordance with Visy's material handling processes in the EIS.	
Signage directing to turn off engines for stationary bulk haul trucks during loading and mobile plant when not in use.	OEMP 5.3.5 & 5.3.7 AQMP 4
Minimise the time recyclable collection trucks take to unload and exit the facility.	OEMP 5.3.4 & 5.3.6
Keep the quantity of recyclable materials to a minimum and maintain the throughput of the product and ensure the product is removed from site as soon as possible to minimize potential odours.	OEMP 5.3.5 WMP 3.4.2
Test fire water to determine any contamination levels prior to appropriate disposal to sewer or licensed facility.	OEMP 7.2
Install weighbridge sump pumps to enable contained fire water to be removed.	
Locate spill kits strategically throughout the building for use in the event of any minor spill, implement Visy HSE procedure for minor spills, and provide staff training on spill kit use, disposal of used materials, and replenishment of the kit.	OEMP 7.1

ATTACHMENT B: REGISTER OF STATUTORY ENVIRONMENTAL CONTROL MEASURES

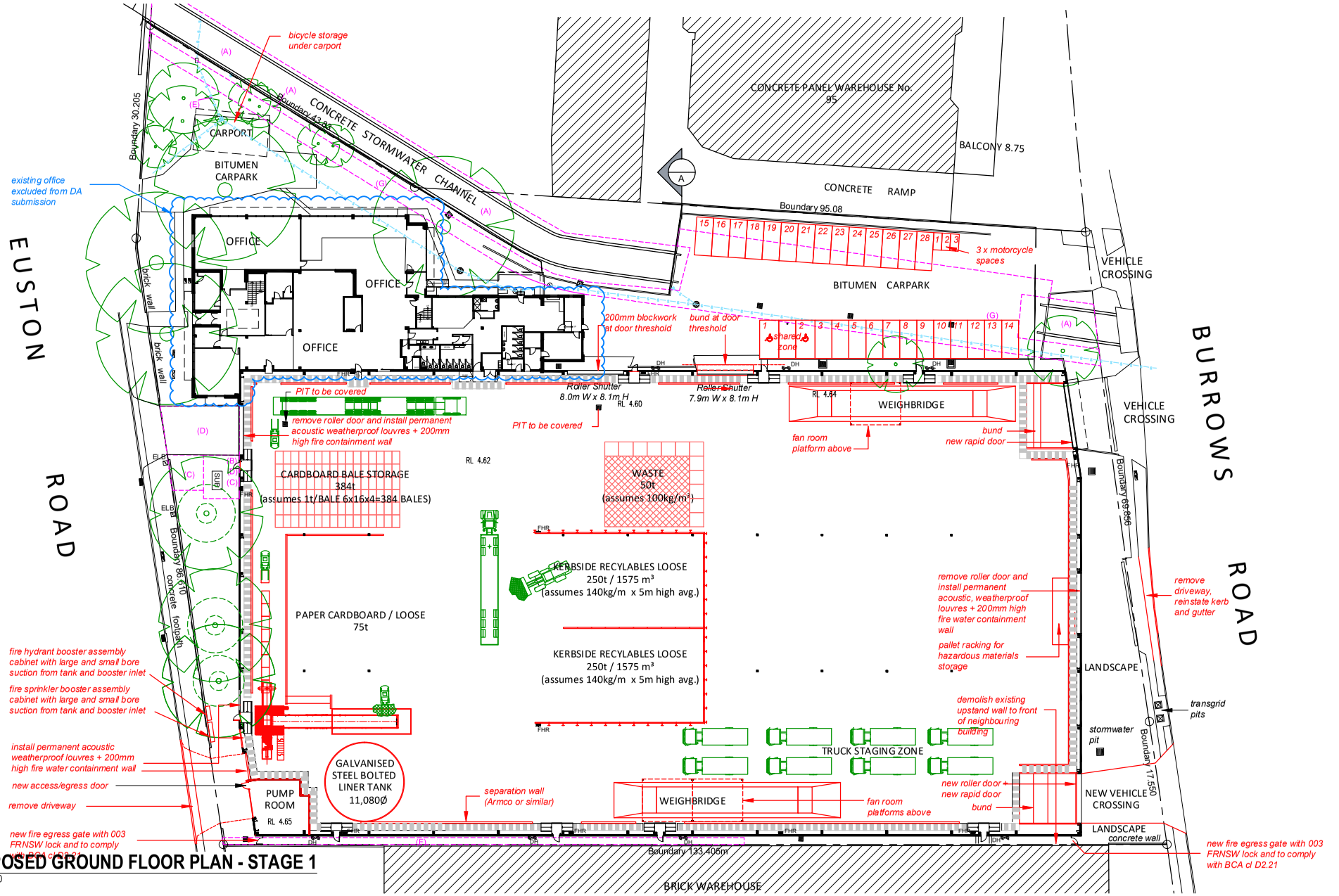
Use a selfbunded diesel storage tank with an integrated dispenser for refuelling mobile plant.	OEMP 5.3.8
Store hydraulic oil for stationary and mobile plant on a bunded pallet and use in accordance with site procedure.	OEMP 5.3.3
Store cleaning fluids and flammable liquid in appropriate cabinets.	
Provide information on acceptable and unacceptable wastes for recyclable material collections to Councils and businesses.	OEMP 5.3.9
Prepare a Contingency Waste Management Plan (CWMP) as part of the OEMP to include procedures in the event of processing down-time.	WMP 3.5
As last resort, divert trucks to Visy's other waste processing sites such as those at Taren Point or Smithfield if there is insufficient capacity onsite and as part of the CWMP.	
Undertake regular site housekeeping and inspections including operations area floor sweeping to ensure loose litter items are collected and any sediment in operations area is removed.	WMP 3.4.5
Provide rat and mouse bait stations for vermin control.	WMP 3.4.6
Implement emergency response training for site employees as part of the site's emergency response plan.	OEMP 7.2
Secure site with access by authorized persons only.	OEMP 4.4
Prohibit smoking in operations building and smoking only permitted on the site in designated areas.	
Prepare an Operational Traffic Management Plan (OTMP) as part of the OEMP to include: - Signage to identify the Visy site and direct traffic as required - A 13 km/h speed limit for traffic within the site - Designated pedestrian walkway within the operation building with physical barriers provided separation to the AAA (authorised access area) operation area - Site induction for all workers and contractors including Visy's strict safety controls for pedestrian and powered mobile plant interactions.	TMP 4.2 and 4.3
Bulk haul truck movement concentrated at efficient travel times, within Council constraints for kerbside recycling collection times.	OEMP 4.2
Maintain all existing and new landscaping along Euston Road and Burrows Road [within site boundary] to a high standard.	OEMP 5.1 WMP 3.4.7
Prepare a site hazard and environmental risk register in line with Visy health, safety and environment requirements that includes the management of unacceptable waste.	OEMP 6.2

ATTACHMENT B: REGISTER OF STATUTORY ENVIRONMENTAL CONTROL MEASURES

Develop procedures for any onsite activity involving risk of contaminant spill.	OEMP 5.3.8
Prepare a Pollution Incident Response Management Plan (PIRMP) for the operation of the facility.	OEMP 6.3

ATTACHMENT C

VISY ALEXANDRIA TRF SITE LAYOUT



PROPOSED GROUND FLOOR PLAN - STAGE 1

SCALE: 1:500

ARCHISPECTRUM
Suite C5, 8 Allen St, Waterloo NSW 2017
ph:(02) 8003 4074 mob: (0419) 670 108 fax: (02) 8003 9674
email: office@archispectrum.com.au A.B.N. 40 966 067 144

ISSUE	DATE	DESCRIPTION
A	22.10.2019	Issue for FEBQ submission to FRNSW
B	23.10.2019	Issue for DA review

PROJECT: **Change of Use to Waste Management Facility**
112 Euston Rd, Alexandria

CLIENT: **VISY**
112 Euston Rd, Alexandria

SHEET TITLE: **Proposed Ground Floor Plan - STAGE 1**

SCALE: 1:500 @ A3
DRAWN: AW

SHEET SIZE: A3
DWG NO: DA04.01
REVISION: b

ATTACHMENT D

VISY ALEXANDRIA GREEN WORKPLACE TRAVEL PLAN

Visy Alexandria – Green Workplace Travel Plan

Visy's Environment Policy states that we, as a company, are committed to continually improving our environmental performance and minimising our impacts on the external environment, and it is the responsibility of all levels of the organisation to give effect to these values.

WALKING AND CYCLING

END OF TRIP FACILITIES

Visy Recycling Alexandria has facilities on-site to encourage employees to cycle or walk to work. Employees are welcome to utilize these facilities at any time during the site's operational hours:

- Secure Bike Storage – Bicycles can be stored in a designated, under-cover bike storage area inside the site's secure boundary. The area has provision for bike-locks and is away from site operations so any staff member can store a bike without fear of it being damaged while unattended.
- Showers – The site's showers are available for use by Visy employees at any time during operational hours.
- Lockers – Lockers are provided for staff to safely store their personal belongings while at work and their work belongings while away, so there is no need to lug all your work gear to and from home each day.

Transport NSW:

"Cycling is a convenient, healthy and environmentally-friendly transport option for getting to where you need to go."

"For a healthy start to your day, why not get off the bus early and finish your trip on foot?"

MANAGER'S RECOMMENDATION – CYCLE THROUGH SYDNEY PARK

'If you don't live in the area and you're interested in an alternative to driving to work, I'd recommend training it to St Peters station and riding your bike through Sydney Park. Bikes are free to travel with on Sydney trains and there are multiple routes, hilly or flat, down to its South corner, so you can mix it up each day. Once you're at the bottom of the park, you head south-east on Campbell Road then North up Burrows, watching for traffic and following all road rules of course. All-in-all it's about 7 minutes between Visy Alexandria and St Peters station.'

– Jake Luschwitz, Visy Recycling NSW Eastern Area Operations Manager

TIPS FOR CYCLING TO WORK

- ALWAYS wear a helmet
- NEVER use your phone while riding a bike
- Don't wear headphones, you need to hear what is happening around you, especially on the road
- Use google maps to plan your trip (85 Burrows Road, Alexandria)
- Trial ride the route before you do it to get to work
- Check the weather the night before your ride
- Know the road rules for both motorists and cyclists
- Allow extra time for your trip so you can enjoy the ride
- Change up your route every now and then

Useful Links

Travelling with bikes - https://transportnsw.info/travel-info/using-public-transport/travelling-with-bikes-surfboards
Walking & Cycling in Sydney - https://transportnsw.info/travel-info/ways-to-get-around/walking-cycling
Road Rules for Cyclists - http://www.rms.nsw.gov.au/roads/bicycles/safety-rules/road-rules-for-bicycle-riders.html
Laws for Cyclists - https://roadsafety.transport.nsw.gov.au/stayingsafe/bicycle-riders/laws.html
National Ride2work day (Wednesday 21/10/2020) - https://www.bicyclenetwork.com.au/rides-and-events/ride2work/

VISY
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Images on this page are courtesy of contributors to the Sydney Park Facebook Page (www.facebook.com/sydneypark2044)

PUBLIC TRANSPORT

ST PETERS TRAIN STATION

Routes from this stop

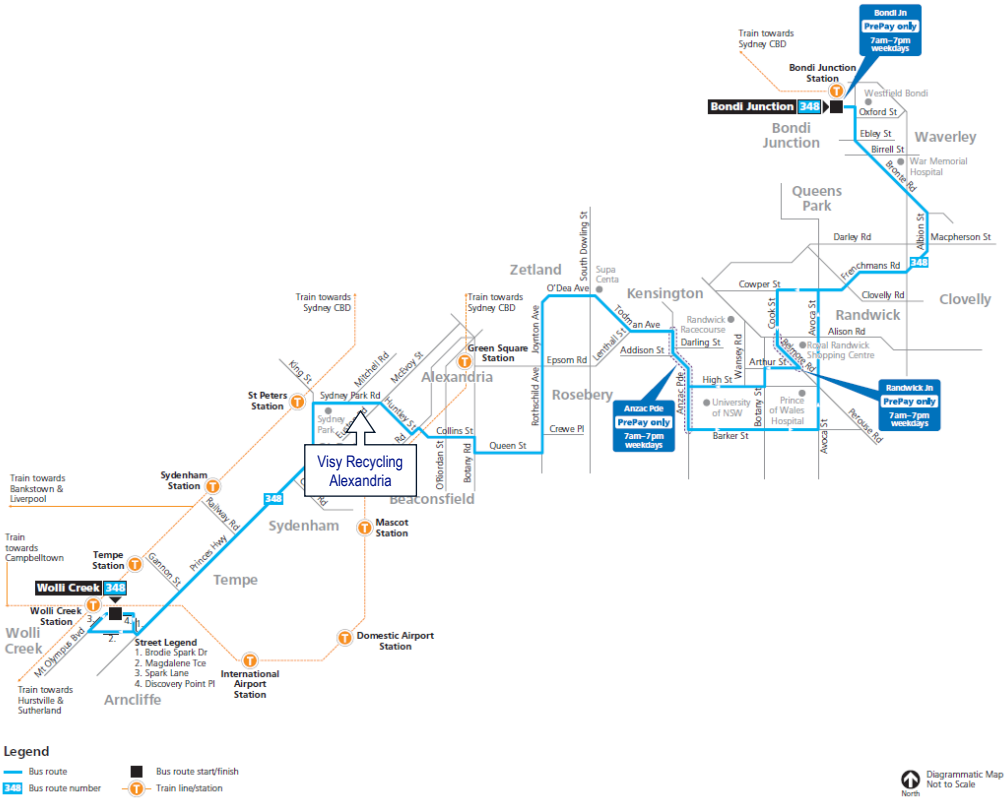
T2	Parramatta or Leppington to City
T3	Liverpool or Lidcombe to City via Bankstown
T3	City to Liverpool or Lidcombe via Bankstown
T8	City to Macarthur via Airport or Sydenham
T8	Macarthur to City via Airport or Sydenham

GREEN SQUARE TRAIN STATION

Routes from this stop

T8	City to Macarthur via Airport or Sydenham
T8	Macarthur to City via Airport or Sydenham

348 BUS STOP ON HUNTLEY STREET



Useful Links

Info on St Peters Station - https://transportnsw.info/stop?q=10101443#/
Info on Green Square Station - https://transportnsw.info/stop?q=10101329#/
Public Transport Trip planner - https://transportnsw.info/trip#/
348 Bus Info - https://transportnsw.info/routes/details/sydney-buses-network/348/74348

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FOR A BETTER WORLD

Images on this page are courtesy of Transport NSW and contributors to Google Maps/Google Earth/Picasa

ATTACHMENT E

VISY RECYCLING 10 LIFESAVING RULES

10 LIFESAVING RULES @ VISY RECYCLING

Visy Recycling's 10 Lifesaving Rules are designed to protect your safety. These rules must be followed to ensure that everyone is safe while at work.

1 FIT FOR WORK

- Arrive at work in a fit state.
- Speak up if you are feeling fatigued or unwell.
- Comply with Visy's Alcohol & Other Drugs policy.
- Notify your Supervisor if you are experiencing a physical or mental issue.

2 SPEAK UP

- Report all hazards, incidents, injuries and near miss events.
- Question your workmates if you see them working in an unsafe manner or placing you or others at risk.
- Discuss any safety improvement ideas or innovations with your Supervisor.

3 PROCEDURES & PERMITS

- Follow Standard Work Procedures for routine work.
- Use 'Stop & Think' or JSEA as applicable for all non-routine work.
- Obtain relevant work permits for all high risk work.
- Complete Pre-Start Checks to ensure plant / equipment is safe for start-up and operation.

4 PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Understand and comply with site and task PPE requirements.
- Always ensure PPE is fit for purpose and maintained in good condition.

5 MANUAL HANDLING

- Complete warm-up/stretching exercises prior to starting work.
- Always assess the task. If it is too heavy don't lift it.
- Use mechanical aids for lifting, carrying and transporting items where possible.
- Always use safe manual handling techniques.

6 SLIPS & TRIPS

- Keep walkways and stairs clear of clutter at all times.
- Keep floor areas clear of spilt liquids, clean up spills immediately.
- Ensure hoses or electrical leads do not create a trip hazard.

7 ISOLATION & GUARDING

- Never operate equipment without guarding.
- Never remove or tamper with guarding or its interlocks.
- Follow isolation and lockout procedures prior to any maintenance, servicing or cleaning work.

8 PME & PEDESTRIAN SAFETY

- Maintain a safe separation zone between powered mobile equipment (PME) and pedestrians (3m–forklifts, 10m–Front End Loaders).
- Strictly follow site Authorised Access Area (AAA) procedures and never enter a AAA without the required approval.
- PME is to be operated in a safe manner and only by Authorised personnel.

9 HEIGHT SAFETY

- Maintain 3 points of contact when using stairs and ladders.
- Ensure work is performed from a stable work surface suitable to support the weight of person and equipment.
- Ensure a safety harness is worn and secured at all times to an anchorage point where required.

10 FIRE SAFETY

- Keep clear access to all emergency exits and fire fighting equipment.
- Constantly monitor material stockpiles for any signs of smouldering or smoke.
- Be familiar with the location and operation of emergency equipment within your work area.

STOP AND THINK VISY FOR A BETTER WORLD

You MUST take reasonable care of your own health and safety and the health and safety of others while at work.

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ATTACHMENT F

VISY RECYCLING

SAFE BEHAVIOUR AND COMPLIANCE AUDIT

VISY RECYCLING – SAFE BEHAVIOUR & COMPLIANCE AUDIT (SBCA)

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Site Name:		Auditor: Name & Sign		Date / Time:	

#	Item / Issue (Tick NO if an AT-RISK behaviour is observed or a compliance breach is identified)	Result / Status Y (OK)	N (Not OK)	N/A	Comments / Verification Provide details on evidence sighted and behaviours observed	Follow Up Actions Required Provide details of any Immediate Actions taken by the Auditor and additional actions required by the site.
1	Appropriate PPE is being worn as per the sites requirements and activity being assessed.					
2	Pedestrians keeping to walkways - i.e. no one taking short-cuts?					
3	PME and pedestrian interaction rules being followed; 3-metres for Forklifts & 10-metres for Front End Loaders.					
4	AAA and Loading / Unloading Area SWP requirements being followed.					
5	Boom gates are operational and close automatically.					
6	Forklift Operators wearing seatbelts, driving in reverse where visibility would otherwise be impaired, at a suitable speed, in a safe manner.					
7	Confirm pre-start checks are carried out for forklifts, loaders, skid steers, EWP, scissor lifts that are currently operating on site.					
8	Isolation & Lockout procedure in place and being followed correctly.					
9	Contractors, labour hire and employees are inducted and signed in. Verify at least 4 *(where possible).*					
10	Licenses / certificates available for specialised work, e.g. forklift, skid-steer, FEL, EWP, electrical etc. Verify at least 2.					
11	Stop & Think and Maintenance Checklists completed as applicable. Challenge one of each.					
12	Risk Assessments / JSEAs completed and available as applicable.					
13	Applicable permits filled out and authorised such as - Hot-Works & Confined Spaces. Verify.					
14	Work at height of >2m is performed from a work surface with adequate fall protection, elevated work platform, scaffolding or when a safety harness is secured at all times.					
15	Safe manual handling practices taking place.					
16	**Safe transport management pre-departure declaration forms are completed for all outbound loads. Where applicable, check pre-unload forms for inbound loads .Verify.**					

Instruction: This form will be used by the nominated site supervisor or manager to carry out an audit of the behaviour of workers, employees & contractors on-site in respect to safety issues. Each audit process shall last a minimum 1-hour with all findings to be recorded on this form. A Vault 'Audit' record is to be raised and the form scanned and attached to the Vault record.

[1 March 2019]

ATTACHMENT G

AxTRF ENVIRONMENTAL AUDIT

VISY RECYCLING ALEXANDRIA TRF ENVIRONMENTAL AUDIT

Auditor: Name & Sign		Date / Time:	

#	Item / Issue (Tick NO if issue observed or has been breached since last inspection)	Result / Status		Comments / Verification Provide details of observation	Follow Up Actions Provide details of any immediate actions or further actions required.
		Y (OK)	N (Not OK)		
1	Has the facility received any complaints in the past 6 months? If complaints received, has the issue/s been resolved?				
2	Has the facility had any environmental incidents in the past 6 months? If yes, has the issue/s been resolved?				
3	Is the site secure with rapid doors closed except to allow truck passage?				
4	Is the operations building ventilation system operating satisfactorily?				
5	Is truck flow and unloading within the facility occurring efficiently with no persistent delays to FCM unloading?				
6	Are the FCM receival bays emptied of bulk waste at least every 48 hrs?				
7	Is FCM fully contained with the receival bays?				
8	Have any gross contaminated FCM loads (ie. >15% unacceptable waste) been received in the past month?				
9	Is there visible dust or perceptible odour emissions from the facility (ie. out of the doorways or through the louvres)?				
10	Are the 'engine off' signs visible and adhered to by stationary trucks?				
11	Is the building floor kept clean of dust, litter, and other material?				
12	Is the facility housekeeping maintained to the required standard?				
13	Have there been any issues with vermin or pests?				
14	Is the facility meeting its environmental performance indicators?				

Instruction: This form will be used by the Site Manager or delegate to carry out a compliance inspection of the site in respect to statutory environmental compliance aspects.
Each inspection process shall last a minimum 1-hour with all findings to be recorded on this form. A Vault 'Audit' record is to be raised and the form scanned and attached to the Vault record.