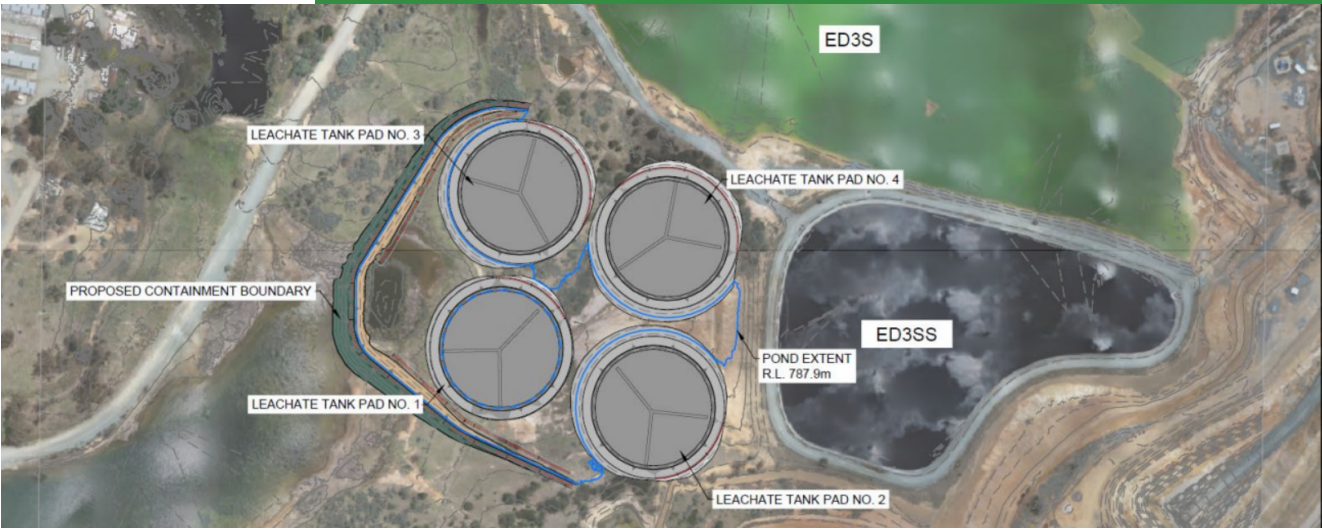


Woodlawn Eco Precinct Construction Environmental Management Plan

September 2025

Woodlawn Eco Precinct - Tank Farm 1

MAN-18110-2
Issue Date: 15/09/2025



1. Revision History

Prepared By	Version	Approved By	Change	Date
Raymond Choy	1	Environmental Manager NSW/ACT	Draft of plan	28/08/2025
Raymond Choy,	2	Justin Houghton	Approval of plan following changes	04/09/2025

Anthony Hayman				
Raymond Choy	3	Justin Houghton	Modification to plan following regulatory insights	15/09/2025

Woodlawn Eco Precinct - Tank Farm 1

PURPOSE	The purpose of this CEMP is to provide an overview of the potential environmental impacts assessed for the Woodlawn Eco Precinct during future site construction and describe the management and mitigation measures to protect the environment on site and sensitive receivers offsite.
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Scope	This manual applies to all Veolia Woodlawn Eco Precinct staff and contractors for the purpose of managing environmental release during planned and approved construction works. Only construction works undertaken per approval described in Modification 6 to PA 10_0012 are covered in this plan.
Review Frequency	The management strategies and control measures detailed within this CEMP will be reviewed and updated to reflect changes introduced by the operational team, site specific outcomes, non-conformances, and recommendations arising out of inspections, meetings, audits, and regulatory updates and or as required by the DPHI DA Consent Conditions Modification 6 to PA 10_0012.

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2. Introduction

2.1 Overview

A Construction Environmental Management Plan (CEMP) is essential for construction at established Veolia sites, in the event of any further construction, this plan outlines how future construction activities will be managed at Woodlawn Eco Precinct to prevent or lessen environmental harm and disturbances, guaranteeing environmental compliance and minimising potential impacts, in accordance with specific requirements set by the NSW Department of Planning, Housing and Infrastructure and the NSW Environment Protection Authority.

The aim of this CEMP is to provide a framework for effective environmental management for site construction of tanks and minimise potential environmental impacts associated with any building construction work at Veolia Woodlawn Eco Precinct located at 610 Collector Road, Tarago.

The site contains existing infrastructure including several dams, weighbridge and weighbridge office, car park, administration and amenities area, water treatment plants and wheel washes with associated driveway and ramps to enter and exit. The construction site of tank farm 1 occupies approximately 3.84ha of land to the south of Evaporation Dam 3 South (ED3S). The land contains a mixture of bare areas and vegetation such as trees, grasses and bushes.

This document will be updated to reflect the conditions of any statutory approvals, as required. This document will be reviewed and amended as appropriate throughout the lifecycle of the Woodlawn Eco Precinct Tank Farm 1 project, but each version requires submission and approval by DPHI to be considered valid.

The overall implementation of the CEMP will be the responsibility of the Woodlawn Eco Precinct Manager (as of 4 September 2025, Justin Houghton).

All works will adhere to conditions of the approval for Modification 6 of MP10_0012 (MP_10_0012-Mod-6) as issued by the Department of Planning and Environment. This includes construction of the development of Tank Farm 1 and associated pipework and pumps are constructed in accordance with the specification and design drawings included with the documents titled 'Technical Memorandum – Permanent Tanks Installation Basis of Design' prepared by Resource Engineering Consultants and dated 10 March 2025 (Report: P23-72-PR-10/TM01 REV 2) and "Tank Farm 1 Foundations Technical Specification Veolia Environmental Services Pty Ltd Woodlawn Eco Precinct" prepared by Resource Engineering Consultants and dated 20 May 2025 (Report: P23-72-PR-10/R01 REV 1);

This plan was prepared to comply with the below condition of consent:

4A. Prior to construction for MP_10_0012-Mod-6, the Applicant must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of condition 2A of Schedule 7 and to the satisfaction of the Planning Secretary

2.2 Objectives of the CEMP

This CEMP has been prepared to satisfy the requirements of the Conditions of Development Consent while demonstrating that sound environmental management shall be followed in the event of future Constructions works at Veolia's Woodlawn Eco Precinct. The management and control measures described within are to be

implemented in a manner to minimise adverse impacts on the environment. In accordance with Veolia's Environmental Management System and as a means of continually improving environmental performance, Veolia is committed to achieving best practice in environmental management across all its activities. This commitment is demonstrated by:

The objectives of this CEMP are to:

- Provide a working environmental management tool to follow during the building Construction on site;
- Comply with relevant environmental legislation, including the Conditions of Consent relating to the Site;
- Ensuring that all construction projects and their associated activities do not degrade the quality of the general environment.
- Comply with relevant environmental legislation, including the Conditions of Consent relating to the Site.
- Define roles and responsibilities of the project management team and contractors during the Building construction works on site.
- Evaluating potential environmental impacts at the planning stage to ensure such impacts are minimised or avoided during the construction phase.
- Ensuring Veolia staff and sub-contractors are aware of their environmental responsibilities, are trained to fulfil such responsibilities and are proactive in their approach to environmental management.
- Ensuring Veolia staff and sub-contractors comply with Veolia's Environmental Management System, this CEMP and relevant environmental legislation, regulations and client requirements.
- Minimising waste generation and consumption of resources and encouraging recycling.
- Appropriate management and disposal of contaminated waste which may be encountered during construction works.

The CEMP should be read in conjunction with its supporting appendices, which are presented as separate documents.

2.3 Environmental Commitment

Veolia is committed to the responsible environmental management of any future Construction building works at Tank Farm 1, and believes that all potential adverse environmental effects can be effectively managed and minimised. All planning, construction, operation and maintenance associated with the Construction building works will be undertaken in such a way as to minimise all potential adverse environmental effects.

Veolia will conduct all operations in alignment with its Environmental and Sustainability Policy

Environmental issues that may be encountered during the Program include the following:

- Soil and water quality.
- Erosion and sediment control.
- Air quality, odour and dust control.
- Waste generation and minimisation.
- Noise and vibration.
- Traffic and access.
- Native flora and fauna impacts

All Veolia Staff and its sub-contractors will comply with this CEMP.

2.4 Project specific construction conditions of consent

The project has the following project specific construction conditions of consent, outlined in Table 1

Wodlawn Eco Precinct - Tank Farm 1

COC ID	Condition of Consent related to construction	CEMP reference
11A	The Applicant must ensure the specific mitigation measures that will be implemented to manage dust generation from construction stockpiles for MP10_0012-Mod-6 are included in the Construction Environmental Management Plan required by Condition 4A of Schedule 7.	Section 6.1 Managements Measures
18X.	The Applicant must: (a) ensure Tank Farm 1 and associated pipework and pumps are constructed in accordance with the specification and design drawings included with the documents titled 'Technical Memorandum – Permanent Tanks Installation Basis of Design' prepared by Resource Engineering Consultants and dated 10 March 2025 (Report: P23-72-PR-10/TM01 REV 2) and "Tank Farm 1 Foundations Technical Specification Veolia Environmental Services Pty Ltd Woodlawn Eco Precinct" prepared by Resource Engineering Consultants and dated 20 May 2025 (Report: P23-72-PR-10/R01 REV 1); Woodlawn Eco Precinct - Tank Farm 1	Section 2.1 overview
23A.	Prior to any clearing or construction works for MP10_0012-Mod-6, the Applicant must purchase and retire 54 ecosystem credits and 67 species credits to offset the removal of PCT GoulburnLithgow Tableland Hills Grassy Forest and Southern Myotis habitat at the site. The ecosystem and species credits must be retired in accordance with the requirements of the Biodiversity Offsets Scheme and the Biodiversity Conservation Act 2016.	8. Flora and Fauna Impacts
23B	The requirement to retire ecosystem and species credits (see condition 23A) may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem and species credits, as calculated by the Biodiversity Offsets Payment Calculator.	8. Flora and Fauna Impacts
23C.	Prior to undertaking any clearing or construction works for MP10_0012-Mod-6, the Applicant must provide the Planning Secretary with evidence that:(a) the retirement of ecosystem and species credits has been completed in accordance with condition 23A; or (b) a payment has been made to the Biodiversity Conservation Fund in accordance with condition 23B.	8. Flora and Fauna Impacts

23D.	The Applicant must ensure the recommendations of the Biodiversity Assessment Report for MP10_0012-Mod-6, including the relocation of the tree hollow on the site, are included in the Construction Environmental Management Plan required by Condition 4A of Schedule 7.	8. Flora and Fauna Impacts
24A.	If any item or object of Aboriginal heritage significance is identified on site: (a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately; (b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and (c) Heritage NSW must be contacted immediately.	6.1 Managements Measures - Heritage subheading
24B.	Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.	6.1 Managements Measures - Heritage subheading
4A	Heavy vehicles associated with the construction of MP10_0012-Mod-6 must not operate in the vicinity of the school bus stop on Braidwood Road, Tarago during the times of 7.20am to 9.10am and 3.00pm to 4.30pm.	6.1 Managements Measures - Traffic subheading
4A.	Prior to construction for MP10_0012-Mod-6, the Applicant must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of condition 2A of Schedule 7 and to the satisfaction of the Planning Secretary. The CEMP must: (a) include specific requirements to manage impacts from construction traffic from MP10_0012- Mod-6 and any subsequent modifications.	This plan
4B	The Applicant must: (a) not commence construction works associated with MP10_0012-Mod-6 and subsequent modification assessments until the CEMP is approved by the Planning Secretary; and (b) carry out the construction of the works in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.	This Plan

3. Relevant Environmental Legislation

The legal requirements that affect the operation of this site include any legislation which relates to activities or potential environmental impacts of the operations.

3.1 Environmental Planning and Assessment Act 1979

The EP&A Act provides the framework for the assessment of environmental impacts and outlines the planning approvals required for development proposals or activities by public authorities in NSW.

3.2 Protection of the Environment Operations Act 1997

The POEO Act relates to the management of pollution in NSW and is administered by the EPA. Under section 48 of the POEO Act, premises-based scheduled activities (as defined in Schedule 1 of the POEO Act) require an Environment Protection Licence (EPL).

3.3 Waste Avoidance and Recourse Recovery Act 2001

The WARR Act aims to encourage the most efficient use of resources to reduce environmental harm and ensure that resource management is undertaken in a logical, sustainable, and organised manner. The WARR Act establishes a hierarchy to minimise the consumption of natural resources and final disposal of waste by encouraging waste avoidance, reduction, reuse, recycling, and recovery.

3.4 Contaminated Land Management Act 1997

The CLM Act allows the EPA to respond to contamination that is causing a significant risk of harm to human health or the environment and sets out criteria for determining whether such a risk exists.

3.5 The Water Management Act 2000

The main act governing water access in New South Wales is the Water Management Act 2000, which establishes Water Access Licences (WALs) granting rights to take a share of water from specific sources and locations under regulated conditions. The WMA provides for the preparation of water management plans that outline arrangements for water sharing, water source protection and drainage management. No approvals are sought under the Water Management Act 2000 for this project as there is no dewatering during construction, however Veolia will seek any relevant approvals as required if dewatering of bodies is required.

3.6 Work Health and Safety Act 2011 (WHS Act)

The WHS Act aims to provide a balanced and nationally consistent framework to secure the health and safety of workers and workplaces. The WHS Act sets out the requirements that workers should be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work or from a specified types of substances or plant as is reasonably practicable.

4. Licences

Table 2 Applicable licences and permits

Type	Reference	Description
Development Consent	MP_10_0012-Mod-6	Current Development Consent for project
Environmental Protection Licence (EPL)	11436	Scheduled Activity in nearby Bioreactor

5. Environment Policy

Veolia aims at continually improving its environmental performance within a framework of sustainable development by:

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- Effectively managing the significant environmental impacts, monitoring progress, and reviewing environmental performance against objectives and targets on a regular basis
- Driving continual improvement, and meeting the requirements of ISO14001 environmental management systems standard as part of the integrated business management system
- Complying with applicable environmental legislation, contractual and other necessary requirements related to operational activities and assist customers and suppliers to use products and services in an environmentally sensitive way
- Striving to ensure that the policies, objectives, and achievements are communicated to all persons working for and on behalf of the business and to educate and train employees and ensure competence in environmental issues and the environmental effects of their activities
- Preventing pollution and harm to the natural, heritage, and built environments and to reduce the use of all raw materials, energy, and supplies.
- Consulting with relevant stakeholders, considering local environmental conditions and working with local communities to achieve shared and lasting outcomes.
- All managers, employees, contractors, and visitors are responsible for being aware of, and complying with this policy

Veolia's Environmental Policy can be found on its website [here](#).

6. Potential Environmental Construction Impacts

6.1 Managements Measures

The potential environmental impacts arising from any future works on site have been identified based on statutory approvals required for the works required on site and specific environmental targets from the environmental assessment documentation and risk assessment that will be required for any future works.

The following issues are the key potential environmental risks relating to any future building works on site

- Soil erosion** - control of soil erosion must be undertaken during construction, focusing on minimizing disturbance, protecting exposed soil, and managing stormwater runoff. Implement measures like erosion

control blankets, silt fences, and vegetative cover, while also considering techniques like hydroseeding and mulching if required. Continuously inspect and maintain all erosion control measures, cover sand and soil stockpiles, utilize erosion control mats, and construct raised exit pads using crushed rock.

- **Stormwater Management** - erosion control requires regular monitoring and maintenance, including weekly inspection of stockpiles and control measures to ensure effectiveness. Stormwater runoff should be redirected around disturbed areas using berms, ditches, or other drainage structures. Note that the full project area is contained within the existing site catchment dam of Borefield dam, used for raw water supply. Maintain regular inspection and maintain all stormwater control measures to ensure they are functioning properly.
- **Traffic** works on site, may at times cause restrictions to properties and roads along the affected routes. There is an existing carpark within the Site that could be utilised for construction traffic parking and deliveries.

Private worker vehicles would be parked on Site in designated lay-down areas and away from the immediate construction zone in order to avoid congestion.

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All the vehicles on site will not exceed site speed limit, all the loaded construction vehicles entering or leaving the Site must have their loads covered.

Traffic management requirements for on site vehicle movement will be identified on the Sites Traffic Management Plan. These plans will be updated as site conditions change throughout the construction works, and will be communicated through site inductions and toolbox talks.

In addition to the general Woodlawn Eco Precinct level site approved Traffic Management Plan (called the Woodlawn Transport Code of Conduct), this project will be subject to the conditions of approval pertaining the heavy fleet, specifically:

“Heavy vehicles associated with the construction of MP_10_0012-Mod-6 must not operate in the vicinity of the school bus stop on Braidwood Road, Tarago during the times of 7.20am to 9.10am and 3.00pm to 4.30pm”

- **Air quality** impacts as a result of the use of plants and equipment is very low. Construction personnel and relevant Veolia staff would be briefed on Site Management Plan, potential risks and management measures prior to work commencing. Dust mitigation measures, such as water suppression, water sprinkler systems or similar would be employed during the construction works, where required, to minimise any airborne dust generation and subsequent impact on neighbouring sites and workers. Moisture in soils increases aggregation and cementation of the particles, which reduces the potential for dust emissions.
- **Noise and Vibrations** - due to the industrial nature of the area, the distance from residential dwellings it is not expected that construction noise will cause a significant impact on the neighbouring properties

Ensure no significant noise occurs on the site outside the normal construction and operational hours as per the DA conditions.

Choose appropriate machines for each task and adopt efficient work practices to minimise the total construction period and the number of noise sources on the Site.

Avoid unnecessary noise due to idling engines and fast engine speeds when lower speeds are sufficient for the task, ensure compliance with the relevant conditions of the Development Consent.

Ensure all machines used on the site are maintained in good condition, with particular emphasis on exhaust silencers, covers on engines and transmissions, and squeaking or rattling components. Excessively noisy machines would be repaired or removed from the Site.

- **Water** - It is unlikely that groundwater will be encountered or disturbed, on site during any future construction works, however, the installation of erosion and sediment control measures must be carried out to minimise sediment runoff into the adjacent raw water dam used for operational purposes.

Any chemicals and fuels required for the construction works will be stored within watertight bunded areas away from designated stormwater lines or within double bunded containers. Any storage of fuel in the area will require approval of the project manager, as the existing Woodlawn Eco Precinct fuel facilities will sufficiently service the project.

All chemicals stored on site will be recorded on a register. The relevant Material Safety Data Sheets would also be kept on site in accordance with the Work Health and Safety Regulation 2011. Chemicals and fuels would be stored within watertight bunded areas away from designated stormwater lines. Bunded areas for chemical storage would have impervious floors and have the capacity to retain 110% percent of the total volume of all liquids stored therein.

Refuelling, fuel decanting and vehicle maintenance work would take place within a designated bunded area adjacent, spill response kits will be available for immediate use in the event of a spill.

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- **Waste** - Under the POEO Act, it is an offence to 'without lawful authority, wilfully or negligently dispose of waste in a manner which harms or is likely to harm the environment'. Accordingly, the requirements of the POEO Act waste management will comply with the POEO Act, management strategies for waste generated during the construction phase will be aimed at implementing effective controls, correct classification and disposal methods including reuse and recycling where possible.
- **Complaints** - Any dust, noise complaints associated with the construction works will be investigated and acted upon as soon as possible after receipt of the complaint.
- **Heritage** - It is unlikely that any heritage values will be impacted given the surveys undertaken and heritage approval received for this project. There is however residual risk of unexpected finds. All residual risks associated with the development must be managed per the following:

If any item or object of Aboriginal heritage significance is identified on site:

(a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease

Immediately;

(b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and

(c) Heritage NSW must be contacted immediately.

NOTE: 24B. Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance

with the provisions of Part 6 of the National Parks and Wildlife Act 1974.

- **On Site Controls** notifications for on-site truck movements will be managed via a combination of site induction and monitoring of truck movements by contractor. The site induction will be a pre-requisite for drivers visiting the work site and establish the expected operating parameters covering the hazards identified in this plan. This includes managing the impacts to native flora and fauna, noting that the demarcation surveys required by the Consent stipulates the working area.
- **Staff working** on site, subsequent toolbox talks would be conducted, as required during the work, to update staff when changes to the proposed works on sites and or activities are planned.
- **Pest, vermin and noxious weeds** - Visual inspection for pest and vermin will be undertaken. Weed management will be undertaken during the site preparation works to minimise weed establishment and invasions, and will include the following:

Management of weed species on site will be in accordance with the Noxious Weeds Act 1993. • Equipment used for treating weed infestation will be cleaned prior to moving to a new area within the site to minimise the likelihood of transferring any plant material and soil.

Soil stripped and stockpiled from areas containing known weed infestations are to be stored separately and are not to be moved to areas free of weeds.

The table below outlines the environmental targets and key performance indicators that would be adopted for the Project. These targets and indicators will be reviewed and amended based on any environmental impact and risk assessments undertaken for the program and also based on specific approval conditions and any other requirements imposed on the Program from external sources.

7. Environmental Targets and Performance Indicators

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Issues	Objectives	Target/Performance Measure
Soil and Water Quality	- Manage soil erosion and sediment effectively - Wastewater - Fuel Usage - Chemicals	- Zero externally reportable incidents relating to sediment or sewage release and water quality, noise - Zero externally reportable incidents relating to chemical, fuels and oil spills.
Noise and Vibration	- Community, Local Council, EPA, to be notified of all works out of standard hours - Complaints to be registered through Veolia's hot line, and to respond to noise complaints	- No works outside standard hours - All noise related complaints to be responded to by prescribed timeframe
Air Quality	- No ongoing dust or odour issues created as a result of project activities. - All complaints relating to dust or odour must be closed out after the investigation	- Carry out daily environmental monitoring. - Number of complaints relating to dust or odour to be targeted at zero, - Record all complaints
Traffic and Access to site	- Minimise traffic disruptions - Minimise impacts on private property access - Minimise impacts on local school zones	No complaints associated with the traffic from the works
Waste Generation, Resource of material, Recycling Use and Energy Use	- Maximum recycling of project wastes. - Removal of contaminated soils and wastes (if found) in accordance with EPA requirements	- Evidence of recycling of materials where possible. - Waste logs and receipts
Dust	Dust mitigation to be carried out, use water suppression, water sprinkler systems	No complaints associated

Flora and Fauna	Works to be carried out per recommendations contained within Biodiversity Assessment Report for MP_10_0012-Mod-6 which will assure minimisation of impacts to Flora and Fauna	No deviations from measures described, including clearance outside the approved demarcated area.
Heritage	No impacts to heritage values	No impacts to heritage values or unreported unexpected finds or deviations to unexpected finds procedure as outlined in CQA report and in construction report

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8. Environmental Management

It is essential that all personnel associated with the building on site comply with the legal, contractual and environmental requirements presented by Veolia and addressed in this CEMP.

All necessary approvals with respect to the planning and implementation of any building constructions will be obtained by Veolia and/or by the contractor as directed by Veolia. All relevant conditions of licences, permits, consents and approvals are to be adhered to during the construction building stage. Copies of all licences, the PIRMP, consents, permits and approvals will be held on site.

In the event of any emergencies or unpredicted impacts, the Woodlawn Eco Precinct (PIRMP) Pollution Incident Response Management plan will be implemented and the job stopped until relevant authorities provide clarification on agreed steps forward.

The effectiveness and compliance of all management measures will be assessed in the CQA report.

8.1 Roles and Responsibility

Responsibilities for implementation of the CEMP are summarised in Table below.

Actions	Responsibility
Overall implementation of the CEMP	Veolia Project Manager and Contractor Supervisor
Implement methodology for managing and/or disposing construction waste	Veolia Project Manager and / or Contractor.
Coordinate monitoring and compile reports	Veolia Environmental Representative (ER) and/or nominee
Identify Non Conformance and notify Construction Manager/Veolia Safety Health Environment Quality Representative	Contractor and Veolia's ER and/or nominee
Authorise and confirm the implementation of mitigation measures	Project Manager

Develop specific Work Methods and carry out Job Specific Safety Analysis for site personnel	Contractor
Coordinate site health and safety monitoring and compile reports	Contractor

8.2 Project Manager

- Ensure that the Construction Environmental Management Plan is effectively implemented on the project;
- Appoint/nominate the Environmental Representative and/or site nominee;
- Report to senior management on the performance of the system and environmental breaches; •
- Allocate project resources to handle environmental issues;
- Take action to resolve major non-conformances; and
- Ensure suppliers and contractors comply with requirements.

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8.3 Environmental Representative (or nominee)

- Ensure that the CEMP is effectively established, implemented and maintained at the project level;
- Provide support to the project team to enable them to meet their environmental commitments; • Ensure that site personnel receive appropriate environmental awareness training;
- Ensure that environmental records and files are maintained;
- Ensure that non-conformances are recorded and actioned;
- Completing environmental checklists; and
- Undertake environmental monitoring requirements of the licence.
- Review and update the CEMP and associate documents.

8.4 Contractors/Sub-contractors

- Comply with all legal, contractual and environmental requirements;
- Comply with management / supervisory directions; and
- Participate in induction and training as directed.

8.5 All Construction Personnel

- Comply with the relevant Acts, Regulations and Standards.
- Comply with Veolia's Environmental Policy and procedures.
- Promptly report to management on any non-conformances and/or breaches of the system.
- Undergo induction and training in environmental awareness as directed by management Incident Response Plan

All incidents will be managed in accordance with Veolia's Incident Response Plan (IRP). This includes external and internal notification, recording, reporting and response processes. The assessment and reporting of the data related to incidents, regulatory breaches and fines or penalties will be included in the internal and client reports prepared by the Project Manager.

8. Flora and Fauna Impacts

Veolia must, at a minimum, comply with the requirements of the Conditions of Consent and implement ALL recommendations identified in the BDAR report prepared for MP10_0012-MOD-6.

The credit condition is described below:

23A. Prior to any clearing or construction works for MP_10_0012-Mod-6, the Applicant must purchase and retire 54 ecosystem credits and 62 species credits to offset the removal of PCT Goulburn-

Lithgow Tableland Hills Grassy Forest and Southern Myotis habitat at the site. The ecosystem and species credits must be retired in accordance with the requirements of the Biodiversity Offsets Scheme and the Biodiversity Conservation Act 2016.

23B. The requirement to retire ecosystem and species credits (see condition 23A) may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem and species credits, as calculated by the Biodiversity Offsets Payment Calculator.

23C. Prior to undertaking any clearing or construction works for MP_10_0012-Mod-6, the Applicant must provide the Planning Secretary with evidence that:

(a) the retirement of ecosystem and species credits has been completed in accordance with condition 23A; or

(b) a payment has been made to the Biodiversity Conservation Fund in accordance with condition 23B.

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Additionally:

- Veolia will implement ALL recommendations described in Table 21 of the [Biodiversity Assessment Report for MP_10_0012-Mod-6](#) "BDAR" (copied below) which will assure minimisation of impacts to Flora and Fauna. These summary requirements, which Veolia commits to fully undertaking, will be assessed by the project ecologist for compliance throughout the relevant project stages prior to moving to the next stage. Note that for the avoidance of doubt, where the words would and should are used, Veolia **WILL** implement all BDAR recommendations.
- Veolia will consult with the project ecologist during the pre-clearing survey on the specifics for implementation of ALL recommendations identified in the BDAR report. This includes, but is not limited to, the most up to date advice on:
 - where to move the tree hollow, described as required in the Conditions of Consent to,
 - where to place the nesting boxesand any other relevant recommendation implementation the project ecologist supervising works wishes to be prescriptive on.

Again, all conditions will be assessed for compliance by the Project Ecologist who will provide a summary table of compliance with conditions related to pre-construction, during construction and post construction for inclusion in the Construction Quality Assurance report for the project.

Table 21. Recommended measures to be implemented before, during and after construction to avoid and minimise the impacts of the project.

Measure	Action	Outcome	Timing	Responsibility
FF1	Preparation of a Construction Environmental Management Plan (CEMP)	A CEMP will be required for the construction phase of the project. The CEMP would include, as a minimum, industry-standard measures for the management of soil, surface water, weeds, pathogens and pollutants, as well as site-specific measures, including the procedures outlined below. The proposed mitigation measures would include environmental safeguards for protection of neighbouring properties in accordance with relevant policy documentation and Government guidelines. In order to address the potential impacts of the proposal on biodiversity, the mitigation and management measures outlined within this table would be implemented as part of the CEMP. The CEMP would contain an adaptive management component. Adaptive management strategies would be receptive to any new and relevant data that may arise through ongoing assessment and monitoring and are key to the successful implementation of crucial objectives yet also allow flexibility to changing dynamics and ongoing feedback and results.	Pre-construction phase	Veolia
FF2	Dewatering Plan	If required, a dewatering plan will be developed prior to any partial dewatering of waterbodies. The Plan must be prepared by a suitably qualified and experienced ecologist prior to dewatering of waterbodies. The Plan must include details on, but not be limited to, the following: - the native fauna species known to inhabit and/ or use the waterbodies which require transfer - the methodology proposed to transfer the fauna - the location and suitability of the proposed relocation sites - any potential impacts of relocating the fauna to the relocation sites - details of oversight of the Plan's implementation by an ecologist.	Pre-construction phase	Veolia, Project Ecologist
Measure	Action	Outcome	Timing	Responsibility
FF3	Fauna management	Prior to works, the applicant should commission the services of a qualified and experienced Ecologist (minimum 5 years' experience). The Ecologist must be licensed with a current Department of Primary Industries Animal Research Authority permit and New South Wales Scientific License issued under the BC Act. The Ecologist will be commissioned to: - Undertake an extensive pre-clearing survey, delineating habitat trees and trees to be retained/ removed - Supervise the clearance of trees and shrubs (native and exotic) in order to capture, treat and/ or relocate any displaced fauna.	Pre-construction phase	Veolia, Project Ecologist
FF4	Installation of Nest Boxes	To compensate for the removal of one hollow, three artificial hollows (nest boxes or hollow-log tool) should be provided within an appropriate location at the expense of the proponent. In preference, the nest boxes should be installed outside the Subject Land, in a more appropriate area where they are more likely to provide habitat for the threatened species they are targeting.	Pre-construction phase	Veolia
FF5	Vegetation clearing	Tree protection fencing should consist of temporary chain wire panels 1.8m in height, supported by steel stakes fastened together and supported to prevent sideways movement using corner braces. The fence shall be erected prior to the commencement of any work on-site and shall be maintained in good condition for the duration of construction. Where tree protection zones merge together, a single fence encompassing the area is deemed to be adequate. Existing site boundary fences may form part of the enclosure.	Pre-construction phase, construction phase	Veolia, Arborist
FF6	Erosion and Sedimentation	Appropriate erosion and sediment control must be erected and maintained at all times prior to, and during construction in order to avoid the potential of incurring indirect impacts on biodiversity values. As a minimum, such measures should comply with the relevant industry guidelines such as 'the Blue Book' (Landcom, 2004).	Pre-construction phase, construction phase	Veolia

Measure	Action	Outcome	Timing	Responsibility
FF7	Storage and Stockpiling (Soil and Materials)	Allocate all storage, stockpile and laydown sites away from any native vegetation that is planned to be retained. Avoid importing any soil from outside the site as this can introduce weeds and pathogens to the site in order to avoid the potential of incurring indirect impacts on biodiversity values.	Construction phase	Veolia
FF8	Stormwater management	Potential impacts relating to stormwater and runoff will be managed during construction and operation phases. The CEMP will guide stormwater management during the construction phase of development.	Construction, Post-construction phase	Veolia

9. Spills

In the event of a liquid spill during construction, the emergency response, outlined in the Veolia Spill Response Plan and/or the Contractor's relevant health, safety and environmental plans must be implemented.

10. Fire or Explosion

In the event of a fire or explosion at the Site, the Woodlawn Eco Precinct (PIRMP) Pollution Incident response Management plan will be activated.

11. Induction and Training

All facility employees (and subcontractors, where required) receive suitable environmental training, to ensure they are aware of their responsibilities and are competent to carry out their work.

Environmental requirements are explained to employees as part of Veolia corporate inductions and refreshers and national sustainability awareness training. In addition, during site inductions and on an ongoing basis, training will be provided in meetings and alike. All inductions and ongoing training shall be recorded.

All employees (including subcontractors, as relevant) receive induction/training in the following areas:

- Veolia environmental and sustainability policy
- Site management plans and related documents
- Facility environmental objectives and targets
- Understanding individual authorities and responsibilities
- Significant risks, environmental aspects, impacts, and controls
- Potential consequences of departure from procedures
- Emergency procedure and response
- Understanding their legal obligations

Specific training developed in response to identified Tier 1 Conditions is to be developed and implemented

Personnel performing tasks that can cause significant environmental impacts shall be competent based on appropriate education, training and/or experience.

12. Incidents and Emergencies

Emergency and pollution incident situations shall be dealt with in accordance with Veolia's existing Emergency Response Plan and Pollution Incident Response Management Plan that identify potential emergency situations that may have an impact on the environment and details how to respond to them. These are separate plans that are the guiding documents for managing emergency and pollution incidents at the site.

13. Implementation of the CEMP

13.1 Work Health and Safety Plan

A Work Health and Safety Management Plan (WHSP) and risk assessment shall be developed and implemented prior to commencement of construction at the Site.

A training and induction program will be put in place to ensure that workers are inducted to WHSP and made aware of their obligations under the Work Health and Safety (WHS)

This will include:

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- Measures to minimise exposure pathways;
- Knowing first aid and emergency contact personnel;
- Methods to implement emergency stop work procedures;
- Awareness of incident notification and reporting processes;

All work, health and safety associated documentation such as Site Safety Procedures, Safe Work Method Statements, Job Safety Environmental Analyses, Site Hazard Identification and Assessment Reports will be prepared by the Contractor in consultation with Veolia.

Veolia is certified under ISO9001 Quality Management Systems (QMS), ISO14001 Environmental Management Systems (EMS) and Australian Standard AS45001 for Risk Management. All safety documentation prepared for the construction of the will need to adhere to the requirements of these standards, relevant legislation and industry best practice. This documentation will form part of Veolia's National Integrated Management System which is the platform for housing all health, safety, environmental and quality policies, plans and procedures.

The WHSP will be reviewed and updated as required

13.2 Communication Measures

In addition to management measures already detailed in this plan to manage environmental and work health and safety, the following communication avenues will be employed during the construction phase of the Site.

13.2.1 Communication

With respect to the functioning of the project's EMS, all contractors and other interested parties shall be kept informed in the following manner:

Internal communication methods may include the following where applicable:

- Site meetings
- Project reports
- Performance Assessment Reports
- Audit reports, non-conformance reports
- Noticeboards
- Staff meetings (as required)
- Employee induction, training and tool box sessions (as required)
- Subcontractor coordination meetings

External communication methods may include the following where applicable:

- Community consultation and dissemination of information
- Public notices and announcements
- Meetings and correspondence with appropriate regulatory authorities
- Discussions with adjoining land owners / neighbours who may be affected by the project
- Veolia's Webpage

13.2.2 Community Liaison

In addition to the communication process, Veolia will keep neighbours informed of construction related activities and project progress through the established communication methods such as the:

- Community liaison meetings, undertaken on a bi-monthly basis
- Newsletters, published on a monthly basis in the Tarago Times, or webpage

13.2.3 Complaint Handling

Complaints or adverse reports received from any external source by the Site Office shall be deemed to be public complaints. Community feedback will be possible through the dedicated project email address and Veolia's webpage.

The Project Manager shall be notified of all public complaints. All public complaints received (either written or verbal) will be documented to contain the following information:

- The nature and extent of the complaint.
- The method by which the complaint was made.
- The name and address of the person lodging the complaint.
- Details of location, date, time and effects of the complaint.
- The action taken to address the complaint including follow up contact with the complainant.

The Project Manager, or his nominee, shall investigate and determine appropriate corrective/preventive actions to be taken to address all complaints. The complainant shall be informed in writing the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken the reasons why are to be recorded.

The environmental representative or site nominee shall establish and maintain a system of records which provides full documentation of complaint handling and responses to non-conformances, during the construction phases.

The environmental representative or site nominee will record and follow-up:

- Details of any complaints, including the complainant's name, address and contact number.
- Details of the response to complaints (including supplementary monitoring, corrective action).
- Weather conditions occurring at the time of the event, where relevant, relating to the complaint, including wind conditions and incidence of temperature inversion.

Details of all complaints received will be kept in the complaints register to ensure that a response is provided to the complainant as soon as practicable. The corrective action may involve supplementary monitoring to identify the source of the non-conformance, and/or may involve modification of construction or operational techniques to avoid any recurrence or minimise its adverse effects.

The environmental representative or site nominee will make available a report on complaints to the local community and, upon request, relevant government agencies.

Records of complaints shall be filed in the complaints register which has been established to ensure any complaints are correctly recorded and addressed and shall be kept for at least four years after the complaint was made.

The contractor shall establish and maintain procedures for the collection, indexing, filing, storage and maintenance of site records. Archived records shall be kept in accordance with Veolia's document control procedures.

13.3 Access to Information

Information required to be made publicly available under the Consent will be accessible via the Veolia website. This information will include management plans, monitoring results, complaints register and audits and reviews and will be kept up to date as required.

14. Audits

Veolia has a National Integrated Management System (NIMS) which is certified under ISO 14001 Environmental Management System and therefore undertakes comprehensive monitoring of its management system and environmental performance. Accordingly, a NIMS audit tool forms part of the annual governance program in NSW, to address the environmental performance of all Veolia facilities and is managed internally by the NSW Safety, Health, Environment, and Quality team. An audit schedule will be prepared to review the environmental performance of the Site during the construction and operation stages against all relevant legislative requirements. The CEMP compliance audits will be undertaken by suitably qualified and experienced NSW Safety, Health, Environment and Quality personnel not directly associated with the project and in accordance with the audit schedule.

15. Environmental Monitoring Schedule

The environmental monitoring schedule details the monitoring program for the site's future construction. It outlines all feasible steps to prevent and reduce potential environmental harm.

In the event pollutants are detected, monitoring is to occur. A monitoring report is to include the following: •

- The locations and results of the potential pollutant monitoring.
- Tabulation of results, together with notes identifying the principal sources of potential pollutants.
- Summary of any measurements exceeding the criteria levels, and descriptions of the circumstances causing these exceedances.
- Details of corrective action applicable to criteria exceedances, and confirmation of its successful implementation. Where corrective action has not yet been implemented, it may be shown as pending, and the status of its implementation shall be carried forward to the site's reporting requirements.

Veolia must notify the relevant agencies and any stakeholders of incidents causing or threatening material harm to the environment or human health as soon as practical after they become aware of the incident. Notification will initially be made via telephone. Any non-compliances will stop the project until clarification from the relevant authorities on the route forward is received.

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Appendix 1 - Reference and Related Documents

Document Code/ Reference	Document Name
MAN-169	Business Management Manual
POL-3	Sustainability Policy
POL-10	Environment Policy
PRO-161	Audit Management Procedure
PRO-317	NSW Incident Investigation Procedure
STA-294	Incident and Emergency Response Standard
STA-31	Environment Management Standard
MAN-17244	Emergency Response Manual
POL-14659 WL	Bioreactor Transport Code of Conduct
As listed on website	Woodlawn Air Quality and GHG Plan and Landfill Environmental Management Plan
<i>P23-72-PR-10/TM01</i>	Permanent Tank Installation Basis of Design - Prepared 4 September 2025 by Resource Engineering Consultants

Appendix 2 - Abbreviations

Abbreviation	Definition
DA	Development Application
DPHI	NSW Department of Planning, Housing and Industry
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMR	Environmental Management Representative
EPA	NSW Environment Protection Authority
EP&A	<i>Environmental Planning and Assessment Act 1979</i>
EPL	Environmental Protection Licence
LGA	Local Government Area
POEO	<i>Protection of the Environment Operations Act 1997</i>
NIMS	<i>National Integrated Management System</i>
PIRMP	<i>Pollution Incident Report Management Plan</i>

Appendix 3 - Department of Planning - Development Consent

<https://www.planningportal.nsw.gov.au/major-projects/projects/woodlawn-bioreactor-expansion-mod-6-new-leachate-storage>

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Appendix 4 - Site Layout



Appendix 5 - Internal Emergency Contacts

Position	Name	Email	Mobile
General Manager NSW Resource Recovery	Carmen Loecherer	carmen.loecherer@veolia.com	0409 766 470
Woodlawn Eco-Precinct Manager	Justin Houghton	Justin.Houghton@veolia.com	
Woodlawn Eco Precinct Project Manager	Anthony Hayman	anthony.hayman.ext@veolia.com	0401 068 224
Woodlawn Eco Precinct Technical Manager	Ark Du 	Ark.Du@veolia.com	
Woodlawn Civil Engineer	Mahdi Ansari	Mahdi.Ansari@veolia.com	
Woodlawn Operations Manager	Rene Oosting	Rene.oosting@veolia.com	
Woodlawn Environment Manager	Raymond Choy	Raymond.choy@veolia.com	